



POLICY TITLE	CEMETERY POLICY AND REGULATIONS FOR MEMORIAL MASONS
POLICY NO	010
APPROVAL DATE	Adopted February 2016
REVIEW DATE	October 2024 (every Council Term thereafter)
POLICY AIM	This Policy details the regulations for the use of Cullompton Cemetery and the regulations for Memorial Masons.

1. INTRODUCTION

1.1. Cullompton Town Council owns and maintains the Cemetery and Cemetery Extension at Tiverton Road, Cullompton having the power to provide and regulate cemeteries in accordance with the [Local Government Act 1972 s214](#) and the [Local Authorities Cemeteries Order 1977](#). It provides this facility primarily for the benefit of those living within the Parish of Cullompton.

1.2. There are specific requirements for the East (the older) and West (the newer) parts of the Cemetery.

2. GENERAL REGULATIONS

2.1. No burial shall take place, cremated remains scattered, headstone or other memorial fixed or removed from the cemetery or additional inscription made to a headstone or other memorial without the express permission of the Town Clerk or other officer appointed for that purpose by the Council.

2.2. The relatives and friends of the deceased must make their own arrangements for the conduct of any burial service that is to be performed.

2.3. Although a chapel is located in the Cemetery, it is currently not available for public use.

2.4. No interment can take place until a Certificate for Disposal has been provided to the council no later than 5 days prior to the proposed interment taking place and 3 days prior to the interment of ashes.

3. CHARGES AND FEES

- 3.1. Charges and fees are required to be paid in advance and will be reviewed periodically by the council.
- 3.2. The Interment Fee is for the digging of a grave only. Any additional work requested, for example bricking up of a grave, will be chargeable.
- 3.3. If the deceased did not live or own a property within the Parish of Cullompton prior to death, double will be charged for the purchase of a Grant of Exclusive Right of Burial unless exceptional circumstances exist and at the discretion of the Town Clerk.

4. GRANT OF EXCLUSIVE RIGHT OF BURIAL

- 4.1. Grant of Exclusive Right of Burial may be purchased giving the grave owner, for a period beginning on the date of the Grant and not exceeding 75 years, the right to:
 - 4.1.1. One or more burials in that grave space (subject to there being sufficient space available in that burial plot). A burial includes:
 - 4.1.2. The interment of human remains contained in a coffin.
 - 4.1.3. The interment of cremated human remains.
 - 4.1.4. The interment of the body or cremated remains of still-born children.
 - 4.1.5. The placing of human remains in a vault.
- 4.2. **The right to erect and maintain or to place an additional inscription on a headstone or other memorial on that grave space.** From 1 April 2014, the purchase of a Grant of Exclusive Right of Burial includes the right to erect a memorial. For graves purchased before this date, an additional fee is payable before permission to erect a memorial is granted.
- 4.3. Once a Grant of Exclusive Right of Burial for a grave space or cremated remains plot has been purchased, the upkeep and maintenance of that plot becomes the responsibility of the owner of the Deed. The council takes no responsibility for the maintenance or safety of that plot or any memorial erected upon it.
- 4.4. A record detailing all graves or vaults subject to specified rights will be kept by the council.
- 4.5. Unpurchased plots remain the property of the council and there is no right to place any form of memorial on any plot for which a Grant of Exclusive Right of Burial has not been issued. The council reserves the right to conduct more than one interment in any grave for which a Grant of Exclusive Right of Burial has not been purchased.
- 4.6. **Pre-purchase of Graves.** It is possible to pre-purchase a Grant of Exclusive Right of Burial prior to death. Spaces will be allocated in the Cemetery Extension and a Deed of Grant will be issued for graves purchased in this way and will be valid for a maximum of 75 years from the date of issue.
- 4.7. The council may, at the discretion of the Town Clerk, buy back graves that have previously been sold but are unused. Payment will be made at the original

purchase price of the grave less an administration charge of 10% and will only be made when the holder of the Grant of Right of Exclusive Burial surrenders the Grant of Right document to the council.

5. INTERMENT

- 5.1. All graves will have a capacity of two coffins only and must be dug by a professional grave digger employed or contracted by the council. It may be possible for mourners to assist with filling in graves if so desired.
- 5.2. No coffin shall be interred in a grave in such a manner that any part of the coffin is less than 3 feet below the level of any ground adjoining the grave. All coffins in the same grave space must be separated by a layer of earth no less than 6 inches deep.
- 5.3. When any grave is reopened for the purpose of making an additional burial, no person shall disturb any human remains interred or remove any soil which is offensive.

6. MEMORIALS AND HEADSTONES

Memorials and headstones may be installed on a purchased grave in accordance with Cullompton Town Council's this Policy Paragraphs 10-12.

7. REGULATIONS OF THE NATURAL BURIAL AREA

- 7.1. Cullompton Town Council's natural burial area is a place for nature to thrive and to encourage biodiversity. As such, management of this area is by light touch and, with the exception of paths that will not be finished but may be cut, all areas will be left to nature.
- 7.2. By purchasing a burial plot in our natural burial area, you are agreeing to the following:
 - 7.2.1. Purchase of a plot (or plots) is for the right of burial within that plot only. There is no exchange of ownership of the plot(s).
 - 7.2.2. Only interments using environmentally friendly coffins or caskets (without plastic or metal furniture) or shrouds are permitted. Cremated remains may also be interred directly to the earth as well as in environmentally friendly urns and caskets. Only environmentally friendly clothing is to be used to clothe the deceased and any personal effects placed within the coffin/casket must also be environmentally friendly. Jewellery must be removed from the deceased prior to interment.
 - 7.2.3. Only one interment per grave will be permitted and graves will be dug only to single depth.
 - 7.2.4. Floral tributes and flowers placed on graves must not be wrapped in cellophane, tied with florist ribbon or contained in plastic trays as these items are not biodegradable. Cut flowers are welcome. Cut flowers placed on graves will be removed after a reasonable period. Vases cannot be placed on or sunken into plots as these pose a threat to

wildlife. Balloons are strictly forbidden as they also pose a threat to wildlife.

- 7.2.5. Graves will not be personalised with markers, monuments, vases, statues, stones, fences, or other such items nor will the meadow/flowers upon and around the grave be cut without written authority. The integrity of the natural burial ground, nature and the environment are paramount. Cullompton Town Council reserve the right to remove unauthorised items and/or manage, re-seed or plant a grave without notice. Seeds and bulbs may be scattered/planted, subject to the approval of Cullompton Town Council. However, they must remain natural and flower beds must not be cultivated or developed. The location of graves will be by the burial of a steel marker, engraved with the Row and Grave number and identifiable with a metal detector, in the grave just below the surface.
- 7.2.6. Only memorial trees purchased through Cullompton Town Council may be planted on graves. Only native trees may be planted. Application for trees other than listed in the price list are welcome. However, it must be noted that the final decision regarding the planting of a particular species of tree will be with the Council. All trees are guaranteed for a period of 5 years from planting. It must be noted that trees may be cut or in some cases removed by Cullompton Town Council without notice if they preclude the development of other trees, are obstructing a footpath or a grave, or for health and safety reasons.
- 7.2.7. Cullompton Town Council will not be responsible for damage or loss to any items placed upon graves or in any area of the burial ground. Unauthorised items removed by the Council from grave spaces in the natural burial area will be retained for a period of 6 months before being disposed of.
- 7.2.8. Whilst efforts will be made to keep soil away from graves, it must be understood that, on occasions when neighbouring graves are excavated, soil from that grave may temporarily cover other graves. Every effort will be made to minimise this, reduce the time any such action is required, and to make good all graves once the interment is complete. Graves may from time to time be levelled by the addition of topsoil and reseeded by Cullompton Town Council if required and deemed appropriate.
- 7.2.9. Unless attending a service, or to help the disabled or infirm, motor vehicles are restricted to the car park only. Other mobility devices, such as mobility scooters, are permitted but great care must be taken in their use as the pathways will not be formalised.
- 7.2.10. There are litter bins located within the Cemetery and visitors are strongly encouraged to use them.
- 7.2.11. There are to be no recreational activities that may have a negative impact upon visitors to the burial ground or are not respectful to the

burial ground or the environment are permitted. This includes the drinking of alcohol at the burial ground unless as a toast at the time of burial or at picnic during or after a funeral service. Picnics during and after burial services are welcomed, however, consideration must be made for other visitors to the burial ground and the environment; no fires or barbeques are to be lit. Appropriate respect must be always maintained. This includes responsibly disposing of all litter.

- 7.2.12. Photography and videography are permitted. Although the privacy, dignity, and respect of others at the burial ground must be always maintained. No person at the burial ground is to be photographed and/or their image used in any way without their express permission.
- 7.2.13. Other than access paths, the natural burial area will, in the main, be left to nature throughout the year. Accordingly, areas may be overgrown with plants, flowers and grasses as nature intends. This allows nature to thrive and promotes biodiversity. Whilst some plants may be considered weeds by domestic gardeners, they remain an integral part of the natural environment and are, therefore, welcomed. The natural burial area will be sympathetically cut at the end of the growing season and pathways may be cut during the season.
- 7.2.14. For environmental reasons the deceased is not be embalmed or subjected to environmentally unfriendly hygiene treatments prior to the burial unless in exceptional circumstances; in such exceptional circumstances, approval must be received from Cullompton Town Council. Treatments using environmentally friendly products is acceptable.
- 7.2.15. Grave plots, once purchased, may be returned to Cullompton Town Council if a written request is received by the grave owner or a legal representative providing appropriate authorisation. Upon receipt of the request, a refund will be made, minus deductions from the original sum paid for any commissions paid, an annual maintenance fee for each year since the purchase of the plot, and an administration fee. No grave plot can be returned once a burial has taken place, even if an exhumation has been conducted.
- 7.2.16. No exhumation will be permitted unless the appropriate application has been submitted and legal documentation authorising the exhumation received.

7.3. Cullompton Town Council reserves the right to refuse a burial if conditions 7.2.1 to 7.2.16 are not met.

7.4. As an area left to nature, the natural burial area may have uneven and overgrown paths, and there may be various natural hazards. Paths can also become damaged and/or challenging due to weather conditions or wildlife. Cullompton Town Council will not accept any liability for accidents, injury, or damage to any visitor to the burial grounds or cars entering, leaving, or parking at the burial ground.

- 7.5. Please inform Cullompton Town Council on 01884 38249 or by email admin@cullomptontowncouncil.gov.uk if you are aware of any issue or concern regarding the Cemetery.
- 7.6. Cullompton Town Council reserve the right to amend these Regulations at any time if appropriate. A copy of which shall be available to read on each burial ground noticeboard and on our website www.cullomptontowncouncil.gov.uk. Paper copies are also available upon request from our offices.
- 7.7. Adherence to these regulations is essential to maintaining the integrity of the natural burial area and to ensure nature can thrive. Accordingly, it is the duty of Cullompton Town Council to enforce the above regulations without notice.

8. REGULATIONS FOR MEMORIAL MASONS

- 8.1. All Memorial Masons who wish to work in Cullompton Town Council's cemetery must meet the following criteria:
- 8.2. Hold a Public Liability Insurance Policy cover of at least £5m.
- 8.3. Adhere to the National Association of Monumental Mason's Code of Working Practice (March 2000 edition or later). A NAMM approved anchor system is to be used on all new monuments and the same should be installed on all refitted monuments. The choice of the system is left to the Mason but should be the most appropriate for the soil conditions.
- 8.4. Provide a statement to the effect that the Mason has not been barred from working in any other cemetery in the last two years and an assurance that should this occur in the future the Mason will inform the Council immediately.
- 8.5. Ensure that all work will conform to statutory requirements and Cemetery regulations.

9. RIGHTS AND PERMISSION TO ERECT A MONUMENT

- 9.1. It is no longer necessary for a grave owner to purchase separately a Right to Erect a Monument. These Rights will be granted when Exclusive Rights of Burial are obtained. No monuments may be erected on unpurchased graves; should one be so erected the Council may demand its immediate removal at the expense of the Mason.
- 9.2. It is the Mason's responsibility to satisfy him or herself that the purchaser of a monument has a right to erect it. All applications should bear the signature of the owner of these Rights. A complete plan of the proposed monument, including complete details of foundation works and the proposed inscription must be submitted to the council on the latest edition of the appropriate form at least four weeks before work is scheduled to commence. Once this has been approved, a permit to construct will be issued.
- 9.3. Fees and charges for Rights to Erect monuments on graves purchased before 1 April 2014 and other related fees (such as the permission to alter the inscription) will be reviewed annually.

10. INSTALLATION OF A MONUMENT

- 10.1. Memorial Stones are not to be installed until at least 6 months has elapsed since the interment in that grave.
- 10.2. Once in possession of any permit, Masons must give at least 2 clear days of notice of intent to work in the cemetery giving full details of graves and monuments upon which work will be carried out. A proposed time of arrival at the cemetery should also be included where possible. This information may be posted to the council office or sent by email to admin@cullomptontowncouncil.gov.uk.
- 10.3. No variations from the terms of a permit and all monuments must bear the name of the Mason and the grave reference number in characters no higher than 4cm on the rear of the base.

- 10.4. The funeral organiser will order removal of monuments before an interment. All parts of the monument must be removed from the cemetery unless written permission has previously been obtained from the Council. Any masonry found unattended and away from a grave in any part of the cemetery will be deemed to have been abandoned and may be disposed of.
- 10.5. Masons will be notified if an interment is scheduled at a time when they are to be working in a cemetery. All works in the vicinity of the interment must cease and personnel, plant and vehicles must be withdrawn from the area at least 15 minutes before the time of the interment. Work may recommence when all mourners have left the cemetery.
- 10.6. If wheeled or tracked machinery is to be used to transport monuments around the cemetery, masons are to take precautions to protect the graves and lawned areas of the cemetery from damage.

11. MEMORIALS

- 11.1. The following restrictions on the size and type of monuments are required by the Council in accordance with the Cemetery Policy.
- 11.2. Grave memorials or headstones will not exceed:

Depth	12 inches (300mm)
Width	30 inches (760mm)
Height	36 inches (910mm)

- 11.3. Cremation markers will be of the following dimensions:

- 11.3.1. East Cemetery Front Bank (Row M) will have wedge shaped memorial tablets the will not exceed the following dimensions:

Depth	18 inches (450mm)
Width	18 inches (450mm)
Height	4 inches (100mm) tapering to 2 inches (50mm)
Foundation:	Will not exceed 20" (500mm) along each side

11.3.2. West Cemetery (Magnolia) will have wedge shaped memorial tablets that are of the following dimensions:

Depth	18 inches (450mm)
Width	18 inches (450mm)
Height	4 inches (100mm) tapering to 2 inches (50mm)
Foundation	Will not exceed 20" (500mm) along each side

11.3.3. All other cremated plots in the East Cemetery will have memorials that do not exceed the following dimensions:

Depth	12 inches (300mm)
Width	15 inches (375mm)
Height	27 inches (685mm)

11.3.4. Kerbing installed on single width grave spaces in the East Cemetery will not exceed:

Height	7 inches (180mm)
Width	36 inches (910mm)
Length	7 feet (2.13m)

11.3.5. Kerbing installed on double width grave spaces in the East Cemetery will not exceed:

Height	7 inches (180mm)
Width	7 feet (2.13m)
Length	7 feet (2.13m)

11.4. Kerbing is not permitted in the Cemetery (West).

11.5. Only the owner of a grave space has the right to place, or order to be placed, any memorial or other constant item on a grave space. Approval must be sought and obtained prior to a memorial being erected, an inscription added to

an existing memorial or any other changes. Memorials that are erected or changed without such permission may be removed. Memorials are to be constructed of either stone or slate although a small wooden structure may be used as a temporary grave marker. ***For safety reasons, memorials and other items that are made of glass, ceramic or plastic will be removed without notice.***

12. TIVERTON ROAD WEST CEMETERY

- 12.1. All graves in the Cemetery Extension will be laid to lawn with no burial mounds. No memorial items are to be placed on the lawned area. Side by side burial plots may be purchased if available.
- 12.2. Grave memorial headstones will not exceed:

Depth	12 inches (300mm)
Width	30 inches (760mm)
Height	36 inches (910mm)

13. MEMORIAL BENCHES

- 13.1. A limited number of sites are available for the installation of memorial benches in the Cemetery (West) and are indicated on a plan held by the Town Council. Memorial benches may be leased in their entirety for the installation of a memorial plaque or memorial plaques may be one of three plaques installed on a communal bench. The ratio of individual benches and communal benches will be variable and determined by demand for memorial plaques. The waiting list will indicate a preference for an individual or a communal bench plaque. The engraving will consist of no more than 5 lines of text each of which will be no more than 40 characters.
- 13.2. All benches will be purchased, installed, owned and maintained by Cullompton Town Council and will be replaced as considered necessary. Memorial plaques will be purchased and installed by Cullompton Town Council. The engraved message will be agreed, in advance, with the lease holder and plaques will be fabricated from brass or stainless steel and will measure 100mm wide and 50mm high; they will be fixed to memorial benches using brass or stainless-steel screws with domed heads.
- 13.3. Space for memorial plaques will be leased on the following basis:
- 13.3.1. A waiting list for the lease of space for memorial plaques will be maintained by Cullompton Town Council.
 - 13.3.2. Plaques will be payable in advance at the prevailing fee for a lease period not exceeding a period of 5 years.
 - 13.3.3. Fees will be reviewed annually.
 - 13.3.4. Plaques may be installed on an individual bench or up to three plaques may be installed on a communal bench.

- 13.3.5. The scale of fees for memorial plaques is contained in the Schedule of Fees for Cullompton Cemetery which is published annually.
- 13.4. **Leases.** A lease may be granted for the installation of a memorial plaque on a bench in the cemetery for a period not exceeding 5 years. At the end of this 5-year period, the lease holder will be contacted at their last known address and provided with the option of renewing the lease for a further 5 years after payment the prevailing fee. Should the lease not be renewed, the lease will be sold to the next on a maintained waiting list for the prevailing fee and the removed plaque retained for a period of 6 months.

INSPECTION AND MAKING SAFE – The Historic Problem

14. General Issues.

- 14.1. The Council has a duty under Health and Safety legislation to control the dangers that exist in their burial grounds. It has an inspection and make safe programme to ensure dangers have been removed. The legislation that applies to this area is extensive and varied depending on the location and type of Cemetery, however, the Council will utilise the latest guidance as the best practice that is available and current.
- 14.2. Suitable procedures have been adopted and adapted to local conditions to ensure compliance with Health and Safety legislation. Enforcement action may be considered by the HSE should an accident occur.

15. Management Issues

15.1. Raising Awareness

The Council will notify the public that a programme of inspection and safety tests is to be carried out on memorials prior to commencement.

16. Warning Signs/Notices/Cordons/Temporary Supports

- 16.1. When a memorial is found to be unsafe, warning signs will be placed to warn the public. Other measures may be necessary, such as cordoning of and/or temporary supports for the memorial.
- 16.2. When cordoning a memorial consideration will be given to the size of the memorial and the length of time that the cordon might be in place. When using cordons, it is important to cordon the radius of the fall of the memorial so that if it does fall, it will land within the cordoned area.
- 16.3. Temporary supports can be sturdy stakes driven into the ground vertically behind the memorial and secured with appropriate banding. Corner protection will be used in order that the banding does not cause damage. Whilst cordons are suitable for memorials

up to 1.5m in height, they might not be appropriate for taller memorials.

17. **Notifying Grave Owners**

The Council will advise grave owners when memorials are found to be unsafe, although consideration of the practicalities of this process must be considered. This will mean writing to the last known address of the owners of memorials less than 30 years old, in addition to all other publicity. This is an extremely important part of the process.

18. **Training**

- 18.1. Appropriate training will be provided for all personnel involved in the testing of memorials.
- 18.2. If contractors are to be used, they will be required to evidence training and provide adequate public liability insurance, suitable risk assessments and safe methods of working.

19. **Risk Assessment**

- 19.1. Risk assessment has a central role in the inspection and making safe process and will include:
 - 19.1.1. **Identify hazards and their potential to cause harm** – considering the age, size deterioration, etc. of memorials.
 - 19.1.2. **Numbers of visitors** – considering the numbers of visitors to certain areas and the effect this has on the likelihood of accident.
 - 19.1.3. **Vicinity to main roads and paths** – considering the busiest areas of pedestrian traffic.
 - 19.1.4. **Ground conditions** – considering whether ground conditions will affect the stability of a memorial.
 - 19.1.5. **Topography** – considering whether sloping ground could affect the stability of a memorial.
 - 19.1.6. **Construction** – considering the method and materials used in construction and whether some are more liable to deteriorate more than others.
- 19.2. A decision will be made on the most suitable means of making safe memorials and ensuring that this is proportional to the potential risk:
 - 19.2.1. **Identify hazards and their potential to cause harm (large memorials)** – large memorials can kill and if they

are unstable and immediate action will be taken to remove the risk, if possible, by setting into the ground, repairing the memorial or by laying flat. Cordoning and barriers may be inappropriate and a more substantial barrier, to standards indicated in [HSE:HSG 151 – Protecting the Public](#), will be considered if the memorial cannot be made permanently safe. Until the memorial can be made permanently safe, it will regularly be monitored to ensure that the risks to the public are minimised.

19.2.2. **Identify hazards and their potential to cause harm (lawn type memorials)** – consideration will be given to the fact that these smaller memorials tend to result in less serious injuries and, particularly if the memorials are back-to-back, are less likely to fall in such a way as to result in a major injury and appropriate actions will be taken on a case-by-case basis. In addition to physical action, each memorial will have a notice placed upon it to indicate that it is considered unsafe.

19.3. The risk to employees carrying out any inspection or making safe work on memorials will be assessed by:

19.3.1. Assessing the range and extent of hazards such as the size of memorials, the likely stability/instability of memorials, ground conditions including presence of unstable vaults, kerbs etc., risks of falling masonry, lone working, topography, means of making safe, accessibility and other issues specific to the Cemetery.

19.3.2. Examining how these risks can be managed in such a way that they are significantly reduced including the use of lifting plant or equipment, methods of working that are safe, and PPE.

19.4. Memorial safety risk assessments will be carried out for teams working on memorial safety work, grave digging and grounds maintenance. Staff working on all these areas will be able to assess memorial safety and take appropriate action if dangerous memorials are identified.

20. **Inspection and Making Safe**

20.1. The Council will consider how the necessary work will be undertaken remembering that the inspection work must be coordinated with the making safe of memorials. Once a memorial

is identified as dangerous, immediate action must be taken to significantly reduce or eliminate the risk, whether that be to make the memorial permanently safe or whether access is restricted by the use of a cordon or barrier.

- 20.2. Consideration will be given to the people who might encounter dangerous memorials. It may be that a memorial safety team identifies the majority of unsafe memorials, but other Cemetery operatives will be expected to inspect memorials before commencing work on a grave. Grounds maintenance staff will also identify dangerous memorials and, if any suspected shortcomings in memorial safety are identified, they must be reported to the Council in order that remedial action can be taken.
- 20.3. The means of making safe a memorial can also have a significant impact on the progress of the work. Temporary support systems will result in the delay of the primary inspection as time and resource has to be spent on the regular re-inspection of the 'make-safes' to ensure they remain safe should they remain for a long period. It is recommended that temporary supports remain for 3 months which gives the owner sufficient time to make arrangements for repair. It cannot be made temporarily safe for a period exceeding 18 months.
- 20.4. If the owner of an unsafe memorial cannot be contacted, the Council may lay such memorials flat or convert to monolith (where appropriate) after the expiration of the periods listed in 20.3.
- 20.5. Repair of memorials will result in a considerable amount of time and money being spent on the repairs rather than being invested in the making safe of other potentially dangerous memorials. Council will concentrate on the initial inspection and making safe of memorials in such a way that they will be able to demonstrate a co-ordinated inspection and 'make-safe' programme that is not unduly delayed by re-inspection or repair works.
- 20.6. Whilst repair might be considered appropriate in areas where the appearance of the cemetery requires consideration e.g. main driveway, the Council is not obliged to spend excessive amounts of public money on private property and is only obliged to make memorials safe. The Council is empowered to make safe dangerous memorials.
- 20.7. Prior to the start of an inspection, other matters require consideration:
 - 20.7.1. **Inspections on consecrated ground** – The Diocese of

Exeter will be informed at the same time as the public. It is likely that a Faculty will be required (this should be considered in conjunction with any relevant ecclesiastical law). Work will be carried out in accordance with any specific conditions contained within the Faculty.

- 20.7.2. **Heritage value** – The Cemetery has two listed buildings on the site. In such circumstances all memorials on the site may be covered by the same order. There are currently no specific memorials listed, but even when memorials are not listed, consideration will be given to their heritage value and care taken in the inspection and making safe process. Photographs will be taken in all cases where changes are made to a memorial for evidential purposes.
- 20.7.3. **Aesthetics** – The general aesthetics of the site and the reaction of the public will be considered when deciding what action to take in respect dangerous memorials if large numbers of memorials are laid flat. It may be that this is the only method of making safe the memorial, but publicity will be imperative in order to manage public perception and expectations.
- 20.7.4. **Maintenance** – laying memorials flat in areas where no kerbs exist will make maintenance considerably more difficult, it may also significantly add to the number of trip hazards present. For this reason, laying flat will be the last option considered as, although it is the cheapest means of making safe, alternative methods (such as converting headstones to monoliths) will first be considered as being both more cost effective in the long term and more aesthetically pleasing.

21. The Inspection Process

21.1. Prior to commencing inspections, the following will be in place:

- 21.1.1. A method statement.
- 21.1.2. A risk assessment of the process itself.
- 21.1.3. Public Liability insurance.
- 21.1.4. A means of recording and storing inspection data.

21.2. All memorials in the burial ground will be visually assessed as part

of the overall risk assessment process and memorials should be assessed bearing in mind the following issues:

- 21.2.1. Are joints intact?
- 21.2.2. Are kerbs etc. breaking apart?
- 21.2.3. Is the memorial upright?
- 21.2.4. Are the foundations (where evident) intact?
- 21.2.5. What are the ground conditions like?
- 21.2.6. Is it a hard or a soft stone?
- 21.2.7. Is there an intrusion of vegetation?
- 21.2.8. Are faults or cracks present?

21.3. **The ICCM does not recommend the blanket use of a force measuring instrument on all memorials.** However, guidance on when this instrument may be deemed necessary is included in the testing regimes below. Force measuring equipment will always be used in accordance with manufacturer's instructions and calibrated annually.

21.4. The method statement will define the statement 'dilapidated by long neglect' and 'illegible' and this information will be recorded and photographed. Memorials in this category can be removed under [Local Authorities' Cemeteries Order 1977 s16\(2\)\(a\)\(i\)](#) following the process described in Schedule 3 of the same legislation.

21.5. **Memorials up to 625mm:**

- 21.5.1. Full visual inspection.
- 21.5.2. Hand Test only.
- 21.5.3. These smaller memorials will be tested visually and by hand only with the owner being advised if any joints or components have become detached. No temporary support will be required for most memorials of this height however some books on rests might be laid flat to prevent them falling from their rests and breaking. Cavities that develop below the cover slab of kerbed memorials may be a danger to those who step onto the grave. Any found can be filled with earth or repaired and, in the first instance, the grave owner will be expected to arrange this repair.

21.6. **Memorials 625mm to 1.5 m:**

- 21.6.1. Full visual inspection.
- 21.6.2. Hand test – primary test.

- 21.6.3. Confirmatory test using a mechanical force measuring device only if felt necessary after the results of a hand test are found to be inconclusive and where some movement is felt. Force must not exceed 25Kg at 1.5m or the apex of the memorial, whichever is lower. Force testing equipment should not be used on listed memorials without first contacting English Heritage.
- 21.6.4. Record all findings, immediate actions taken, and future actions required.
- 21.6.5. Where movement is found but the memorial appears safe or can resist a force of 25kg, it will be reinspected every 2 years.

21.7. **Memorials over 1.5m in height:**

- 21.7.1. Full Visual inspection.
- 21.7.2. **Hand test only** (on *non-complex* structures). Certain memorials over 1.5m can fail a hand test yet pass a mechanical test due to the hand test being carried out at a higher point on the memorial than a mechanical test which takes place at shoulder height.
- 21.7.3. Potential concerns over the safety of the memorial will be made and it will be cordoned off if any necessary.
- 21.7.4. A further detailed inspection of the memorial will take place, utilising, where possible, a Structural Engineer. The initial inspection is aimed at obtaining the necessary information that is critical to identifying the safety of the memorial and, therefore, whether the memorial is an immediate danger to the public.

- 21.8. **A memorial that is an 'immediate danger'** to the public is one that fails the testing procedure and/or will not withstand a force approximating 25kg. The memorial only fails if, because of the continuing application of 25kg or less, the memorial would continue to move and eventually fall to the ground.

22. Inspection Records

- 22.1. Every memorial will be inspected, and a record maintained of the inspection. The results of the initial inspection will inform the following inspections so should be as complete as possible. The essential information required for the initial inspection is as follows:
- 22.1.1. Plot Section and Number.
 - 22.1.2. Name of deceased – normally this will be the name of the first interred.
 - 22.1.3. Size of memorial – Simply identifying one of three sizes would be acceptable.
 - 22.1.4. Below 625mm – therefore less of a hazard as it is less likely to be the cause of a fatal accident.
 - 22.1.5. Between 625mm and 1500mm – posing a greater hazard as these memorials are more likely to cause fatal injuries.
 - 22.1.6. Over 1500mm – likely to be unable to be physically inspected and requiring the attention of a structural engineer.
 - 22.1.7. Level of hazard needs to be risk assessed against all the other factors.
 - 22.1.8. **Type of memorial** - headstone, cross etc. This helps identify the memorial if plans are not of a high standard.
 - 22.1.9. **Headstone material** – This will not require the inspector to be an expert on different types of stone. The element critical to a stone's potential safety or otherwise is whether it is a hard or a soft stone.
 - 22.1.10. **Comment on what action is required for the memorial inspected** – This may be the immediate action required such as the cordoning or fencing off of a memorial and the action required in the future to make the memorial permanently safe, such as laying it flat, repairing it or setting it into the ground.
 - 22.1.11. **Category of action** – There will be three simple classifications of the priority of action. This ensures records are easily maintained and will, therefore be

properly utilised. The priorities are:

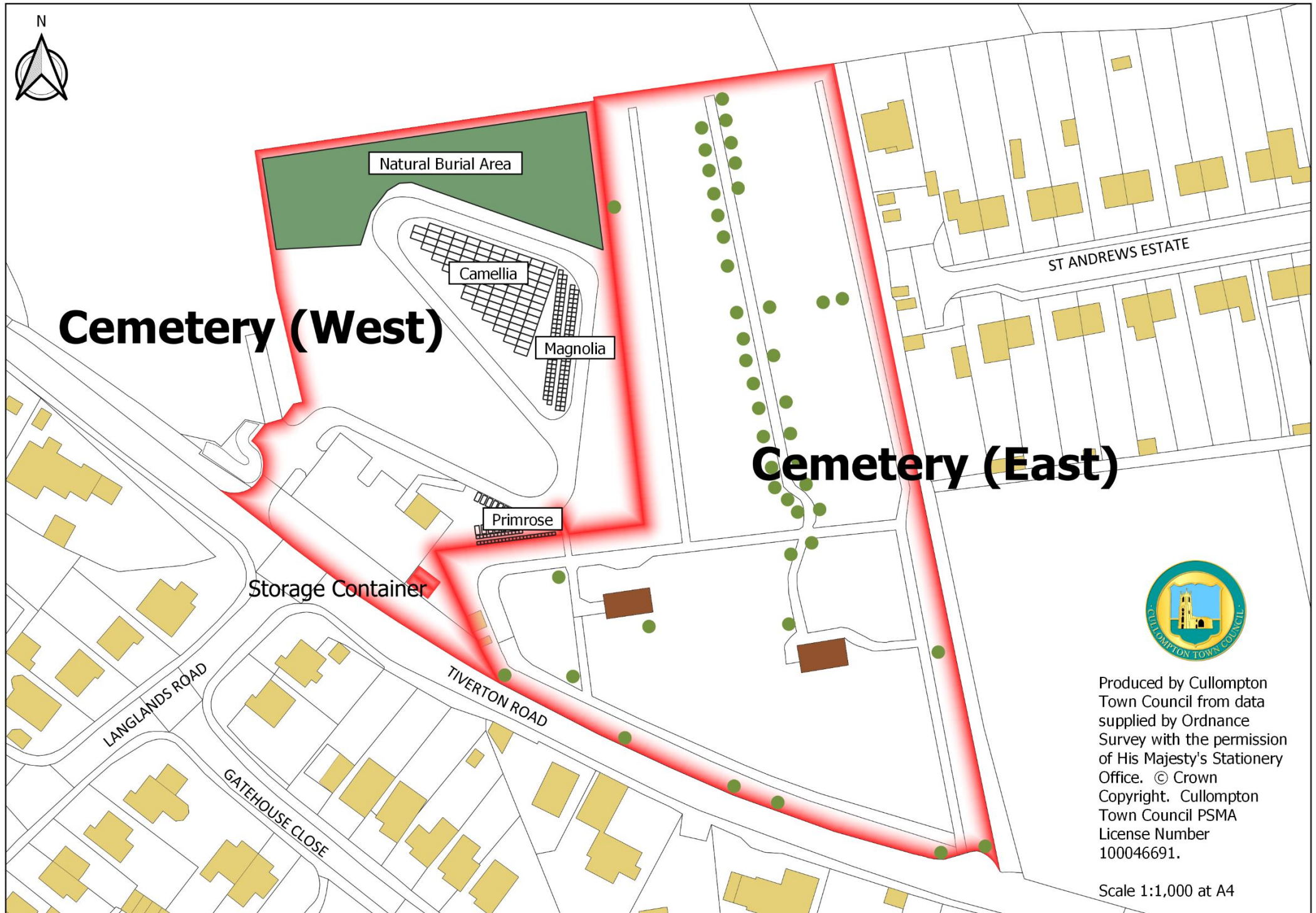
- 22.1.11.1. **Category 1** – Immediate action is required to make the memorial safe or to stop the public accessing the memorial. This could be the permanent removal of the hazard or the temporary making safe of the hazard.
- 22.1.11.2. **Category 2** – The memorial is not an immediate danger to the public but is not fully stable and will, therefore, need to be monitored every 12 months to assess any further deterioration of the memorial. The construction, material used, or position of the memorial may also qualify it as priority 2.
- 22.1.11.3. **Category 3** – The memorial is perfectly stable or below 625mm in height and will only need to be inspected in 5 years.
- 22.1.12. **Failure force** – This information is essential if remedial action is required on a memorial to evidence why such action is being taken.
- 22.1.13. **Digital Image** – This information is also essential if remedial action is required, and to provide a historical record should removal or laying flat be required.
- 22.1.14. **Name of inspector.**
- 22.1.15. **Date of inspection.**
- 22.1.16. Further information can be gathered on the initial inspection, dependent on the type of burial ground, or even which section within the site is being considered. Some examples of these are as follows:
 - 22.1.16.1. **Vandalism** – useful in burial grounds where the effects of vandalism need to be monitored
 - 22.1.16.2. **Weathering** – useful where soft stone memorials utilised in exposed areas
 - 22.1.16.3. **Complete** – is the memorial complete or are components missing?

23. **Analysis of findings**

- 23.1. Once inspections commence and inspection sheets and data begin to be delivered, a simple analysis will be undertaken designed to identify any common problems.
- 23.2. **Mason** – A high failure rate on newer memorials erected by a particular mason would alert the Council to inspect and assess against appropriate industry code of practice. Non-compliance can be dealt with, ensuring that future installations will not cause problems.
- 23.3. **Ground conditions** – may be useful when used with a sub-code on very complex kerbed and vaulted areas where multiples of ground works may be necessary to make the area safe. May also relate to areas of very soft ground or ground liable to subsidence.
- 23.4. After the initial inspection, the Council will aim to complete the inspection of 20% of the total number of memorials each year, in addition to all of the priority 2 biennial inspections.

24. **Responsibility of Owners of Memorials**

The Council will advise owners of memorials that maintenance is their responsibility and to have this carried out on a regular basis following installation. The Council will also advise all owners that their memorials will be subject to a minimum five-yearly inspection and that any defects reported with regard stability should be corrected by the owners of the memorials. This information can be sent whenever a new deed for the exclusive right of burial is sent out and included in the terms and conditions relating to the grave purchased. Terms and conditions can be printed on the reverse of the deed.



Cemetery (West)

Cemetery (East)



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Scale 1:1,000 at A4