

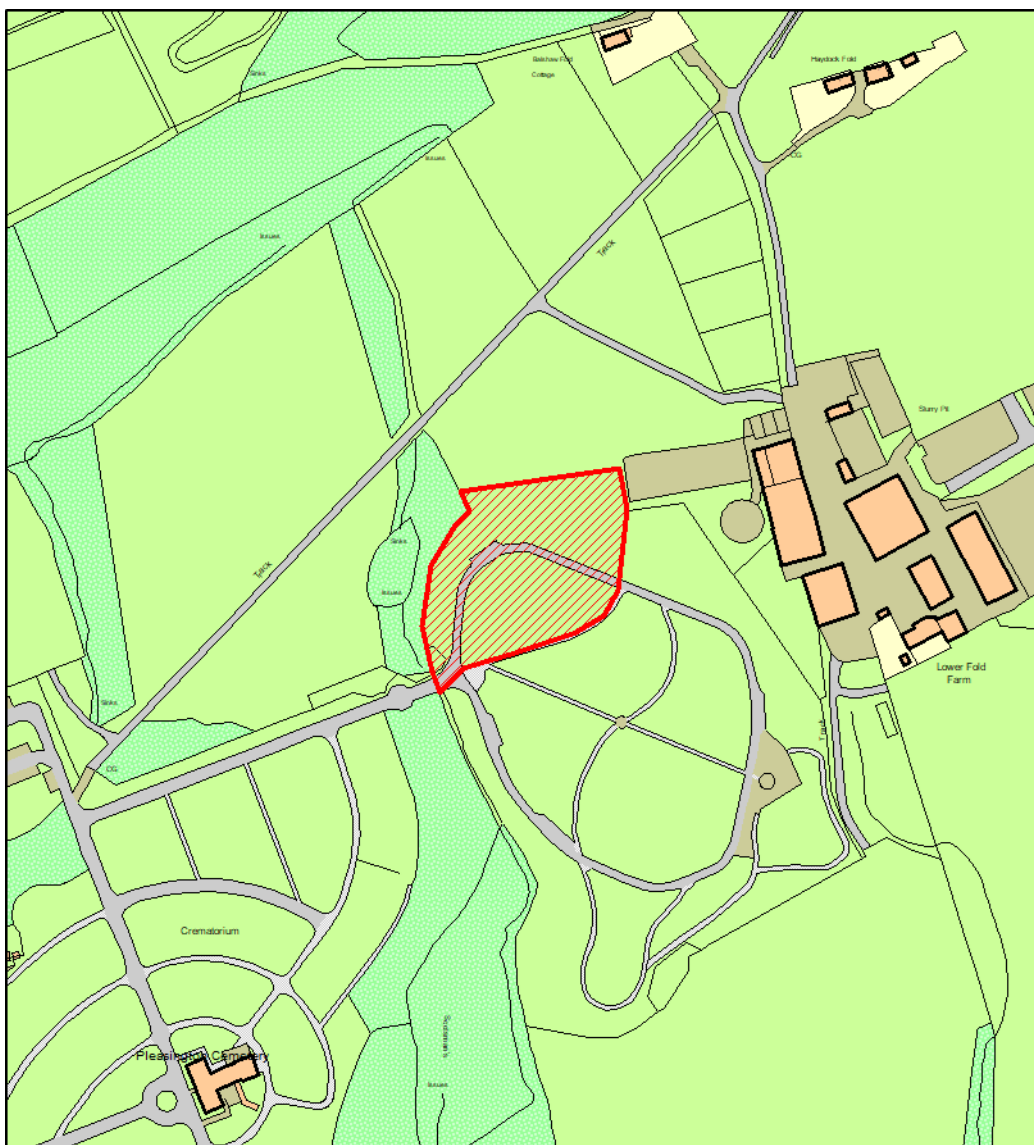
Proposed development: Construction of new prayer room facility including soft landscaping works and associated parking

Site address: Pleasington Cemetery, Tower Road, Blackburn, BB2 5LE

Applicant: Blackburn with Darwen Borough Council

Ward: Livesey with Pleasington

**Councillor Mark Russell
Councillor Derek Hardman
Councillor Paul Marrow**



1.0 SUMMARY OF RECOMMENDATION

- 1.1 The proposed development is recommended to be granted planning permission, subject to the conditions detailed below in Section 5.

2.0 KEY ISSUES/SUMMARY OF PLANNING BALANCE

- 2.1 This application is presented to the Planning and Highways Committee, in accordance with the Scheme of Delegation, and given the fact that Blackburn with Darwen Borough Council is the Applicant. A number of concerns from members of the public together with Pleasington Parish Council have also been received. The concerns raised principally involve parking requirements and the potential for congestion to occur. Future burial arrangements and the design of the building have also been raised. A summary of the responses received is provided below in Section 7.
- 2.2 The proposed development has been publicised through letters to residents of the residential property i.e Lower Fold Farm. Site notices were displayed outside of the site and at the main entrance point from Tower Road on 26th January 2022. In addition, a number of reconsultations have taken place with neighbours and consultees upon the receipt of new/amended information.
- 2.3 The Council's development plan supports new religious developments and associated works, provided they constitute sustainable development, and accord with the development plan when taken as a whole.
- 2.4 The proposed development involves the erection of a single-storey building to be used primarily as a prayer room for funerals. An associated ablutions area and WCs would be provided within. In support of the new building, a parking area and waiting bay would be formed to its south elevation together with supplementary tree planting.
- 2.5 On balance, the proposed development would be satisfactory from a technical point of view, with all issues having been addressed through the application process, or capable of being controlled or mitigated through appropriately worded planning conditions.
- 2.6 The key issues to be addressed in determining this application are;
- Assessing impacts on the green belt;
 - Ensuring the visual amenity of the locality is not adversely harmed;
 - Safeguarding the residential amenities of the closest neighbours;
 - Controlling parking activities within the site;
 - Mitigating tree loss;
 - Ensuring no adverse ecological harm is caused;
 - Foul and surface water drainage,
 - Assessing previous coal mining activity, and;
 - The potential for minerals extraction.

3.0 RATIONALE

3.1 Site and Surroundings

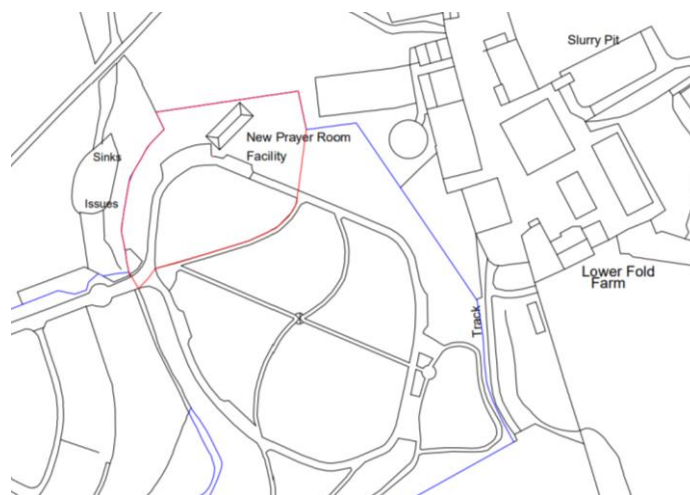
- 3.1.1 The application site is a plot of cemetery land located to the north of the settlement boundary of Blackburn, within the green belt. The site is currently covered in young Willow, Birch, Field Maple, Hawthorn and Alder, which were planted in the past 10 years. Vehicle access is currently gained via the single-track road system that spans the cemetery, from Tower Road.

Figure One – Satellite image of the site



- 3.1.2 The site covers an area of circa 1.6 acres and has an irregular shape. A road spans its centre with a footway along the south boundary. Agricultural and equestrian land uses associated with Lower Fold Farm surround to three sides with wider cemetery land positioned immediately to the south, which is edged in blue on the submitted Location Plan shown below.

Figure Two – (amended) Location Plan showing the extent of the site and existing access point



3.2 Proposed Development

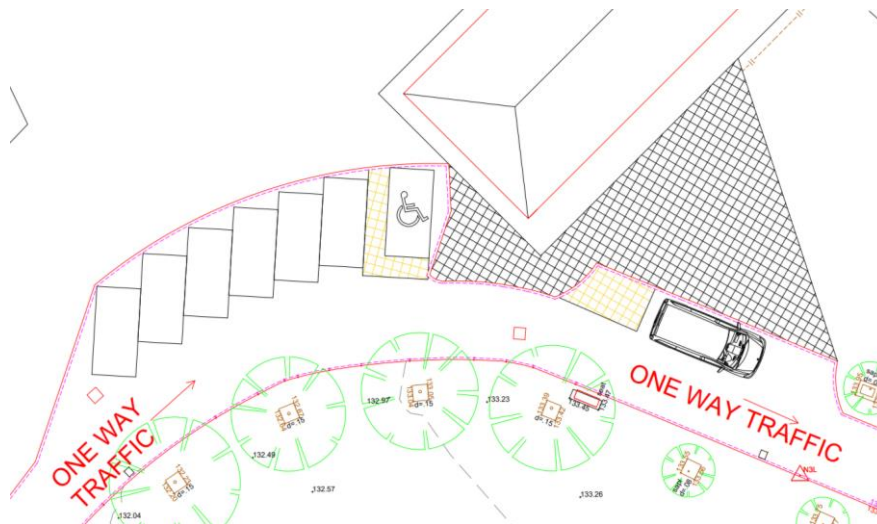
- 3.2.1 As detailed above, this application seeks full planning permission for the erection of a single-storey building to be used primarily as a prayer room. An ablutions area and WCs would also be provided within. The building would have a footprint of circa 235 square meters and a dual-pitched roof up to 3.7m in height. Bricks and concrete tiles would be used to externally finish the building and it would be fitted with white uPVC doors and windows.

Figure Three – Proposed Elevation Plans



- 3.2.2 An extended parking area would be formed to the south of the building providing six standard parking bays together with a larger bay for disabled drivers. A waiting bay would be provided to the southeast of the building for longer vehicles e.g. hearse, with tarmac hardstanding applied as the surfacing treatment. Supplementary planting would also be provided to the south and east of the building.

Figure Three – Proposed Site Plan with new parking area



3.3 Case Officer Site Photos



3.4 Development Plan

3.4.1 Local Plan Part 2 (adopted December 2015)

- Policy 3: The Green Belt
- Policy 7: Sustainable and Viable Development
- Policy 8: Development and People
- Policy 9: Development and the Environment
- Policy 10: Accessibility and Transport
- Policy 11: Design

3.4.2 BwD Parking Standards

- D1: Public Halls/Places of Worship – 1 space per 10 square meters

3.4.3 Joint Lancashire Minerals and Waste Local Plan: Site Allocation and Development Management Policies – Parts One and Two

4.0 **ASSESSMENT**

4.1 Preliminary Matters

- 4.1.1 Concerns have been raised in public and consultee comments regarding future burial arrangements. However, this application covers solely the erection of a building and associated ground works and the scope of this assessment is limited to those works alone.

4.2 Impacts on the Green Belt

- 4.2.1 As detailed, above, the site is positioned within the green belt. The principle of development should therefore be established under the provisions of Policy 3

of the adopted Local Plan. Concerns have been raised in consultee comments given the sites position within the allocation. Policy 3 states that within the green belt, planning permission will not be granted for inappropriate development, except in very special circumstances, or where another policy in the local plan specifically supports a proposal. The construction of new buildings is inappropriate development in the green belt, except in a number of specific circumstances.

- 4.2.2 Those exceptions include the provision of appropriate facilities for cemeteries, as long as the development preserves the openness of the green belt and does not conflict with the purposes of including land within the allocation. Whilst the submitted plans would suggest the building would have a religious purpose moving forward, the proposed development would be ancillary to the primary function of the cemetery, as it would provide a prayer facility to be used during funerals. The proposed development therefore complies with the initial requirements of Policy 3.
- 4.2.3 When assessing losses of openness, the relatively limited height and scale of the building should be taken into account. It would be contained within a corner of the cemetery and adjacent to mature trees along the north boundary, which would all be retained. A condition is recommended to agree the scope of any required tree protecting fencing for those trees. Such a condition is necessary in order to prevent damage to mature trees, which provide valuable screening.
- 4.2.4 A further condition is recommended to agree a supplementary planting scheme. Such a condition is necessary in order to soften the massing of the building when viewed from the south and east. Subject to compliance with those conditions, and when the public benefits generated are taken into account, the proposed development would not lead to any material losses of openness within the site. Compliance with Policy 3 is thus achieved.
- 4.2.5 In accordance with the presumption in favour of sustainable development detailed in the Framework, and Policy 7, development proposals should proceed without delay, unless impacts which significantly and demonstrably outweigh the benefits of the proposal are identified; subject to assessment of the following matters;

4.3 Design and Visual Amenity

- 4.3.1 In general terms, Policy 11 requires all development proposals to represent a good standard of design through demonstrating an understanding of the sites wider context, and making a positive contribution to visual amenity. Concerns have been raised in public and consultee comments on design grounds.
- 4.3.2 The cemetery is currently interspersed with a number of brick built freestanding buildings that occupy prominent positions in their immediate setting. Buildings of the type proposed here are commonplace in the context of open public areas and the presence of another such building would not be harmful to visual amenity.

4.3.3 External construction materials are proposed that would accord with the existing buildings on the wider site. The proposed building would form a functional structure and the use of robust materials such as bricks within the construction will secure its longevity. A condition is recommended to ensure the development is built in strict accordance with the materials and details submitted. Subject to compliance with that condition, together with the recommended condition regarding supplementary planting, the proposed development would be acceptable in relation to design and visual amenity, in accordance with Policy 11.

4.4 Public Amenity

4.4.1 Policy 8 states that all development proposals must secure a satisfactory level of amenity and safety for surrounding uses and for occupants or users of the development itself, with reference to noise, vibration, odour, light, dust, other pollution or nuisance, privacy/overlooking, and the relationship between buildings.

4.4.2 Concerns have been raised in public comments given the potential for additional traffic movements to disturb existing and future site users. Such matters ultimately relate to the amounts, locations and management of parking provision, which is covered in subsequent sections of this report.

4.4.3 Ample separation would be maintained between the adjacent agricultural/equine land uses to ensure adverse levels of disturbance do not arise for future site users. BwD Public Protection have reviewed the merits of the proposals and no objections have been raised on noise or disruption grounds. As proposed, the development is thus acceptable in relation to public amenity.

4.5 Highways and Parking

4.5.1 Policy 10 outlines a general requirement for all development proposals to not prejudice road safety, or the safe and convenient movement of all highway users. Parking should also be provided in accordance with the BwD Parking Standards. Public objections have been raised on parking and highways grounds.

4.5.2 As detailed above, an extended parking area would be constructed, providing 7 spaces in total together with a wide waiting bay. When the parking requirements of the proposals are measured against the BwD Parking Standards, a need for 23 spaces is applicable. Whilst it is acknowledged that the wider site could provide further parking, the needs of this development are in-parts to facilitate future burials within this area of the cemetery. Land within the Borough for such requirements is at a premium and the provision of further parking around the building is not a viable option for the cemetery moving forward.

4.5.3 That said, the wider site is provisioned with an abundance of parking opportunities, including an underused 44-space carpark within 300m of the

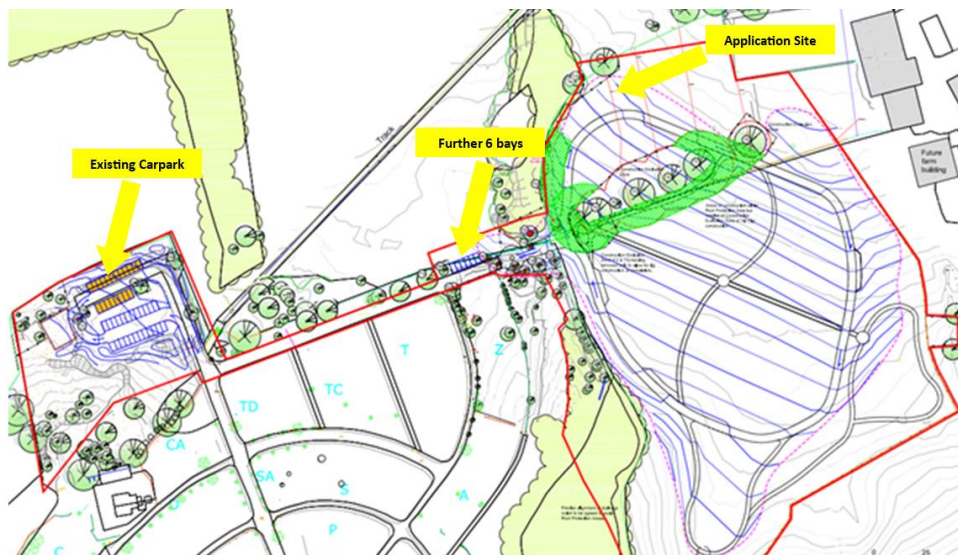
application site, shown below in Figure Four. The carpark was approved under application 10/11/0616 and there is an extant permission to form a further 6 parking bays between the site and existing carpark. The approved plan for that application is shown below in Figure Five and the Agent has confirmed that the further 6 bays will be provided to support this development.

Figure Four – Plan showing proximity to existing carpark



- 4.5.4 The distance between the existing carpark and site is walkable for most people and its presence is of significant benefit to this proposal. A condition is recommended to ensure the proposed parking area is provided adjacent to the building. Such a condition is necessary in order to ensure a certain level of parking is provided immediately adjacent to the development for those that are less able to walk from the existing carpark.

Figure Five – Approved Proposed Site Plan for application 10/11/0616



- 4.5.5 In terms of how wider traffic movements will be managed, the submitted supporting statement identifies a requirement for marshals to oversee comings and goings during funerals. Such an approach has been successfully deployed

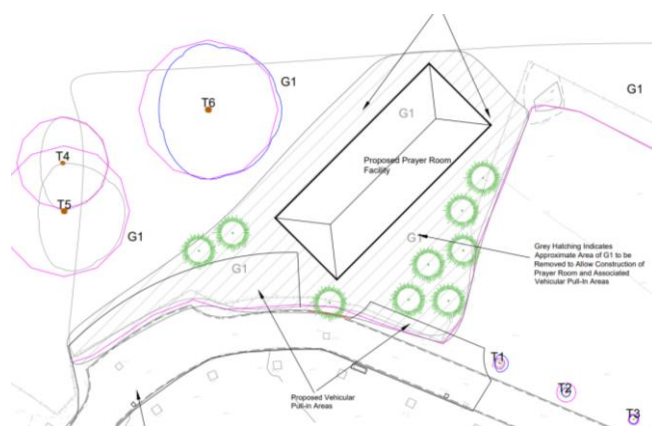
previously for many other Council managed sites with high parking requirements. A condition is therefore recommended regarding the submission of a Traffic Management Plan, as requested by BwD Highways.

- 4.5.6 The plan should cover how users of the development would be diverted to the large existing carpark as the first port of call together with any required overspill arrangements. In addition, the submitted plans indicate that it is the intention to install a one-way marking system around the cemetery, which would be of further benefit to managing traffic movements associated with the proposals.
- 4.5.7 Further conditions have been advised by BwD Highways to encourage sustainable modes of transport and control the logistics of the construction phase. It is recommended that both of those conditions be added. Subject to compliance with the attached conditions, the proposed development would be acceptable in relation to highways and parking, in accordance with Policy 10.

4.6 Arboricultural Considerations

- 4.6.1 As detailed above, young trees currently cover most of the site and the submitted plans indicate that many of the trees would be removed. None of the trees are protected by a preservation order and the legal fallback position is that the landowner could clear-fell the site at any point. That said, Policy 9 states that all development proposals are expected to incorporate existing trees into their design and layout, where achievable.
- 4.6.2 If the removal of one or more trees is permitted as part of a development, a condition is required to ensure an equivalent number or more new trees are planted within the site. In support of the application, an Arboricultural Impact Assessment Overview has been provided. The BwD Arboricultural Advisor has reviewed the submitted assessment and the merits of the proposals as a whole. No objections have been raised, subject to a tree protection fencing scheme being agreed by condition.

Figure Six – Plan showing trees to be retained and indicative landscaping



- 4.6.3 In relation to replacement trees, given that a group of densely planted young trees would be removed, it may not be feasible to replant the same number as those lost. That said, a well-designed landscaping scheme would provide

adequate mitigation. Subject to the imposition of a condition to ensure replacement trees are planted, together with a further condition to ensure protection fencing is provided for any trees (including memorial trees) and boundary hedges to be retained, the proposed development would be acceptable in relation to arboricultural considerations.

4.7 Ecological Considerations

4.7.1 Further requirements within Policy 9 state that all development proposals must avoid unacceptable impacts on environmental assets or interests, including habitats and species. In response to those requirements, a Preliminary Ecological Appraisal has been submitted. The BwD Ecological Advisor has reviewed the submitted appraisal and merits of the proposals as a whole. No objections have been raised and no species of merit were found during the site investigations.

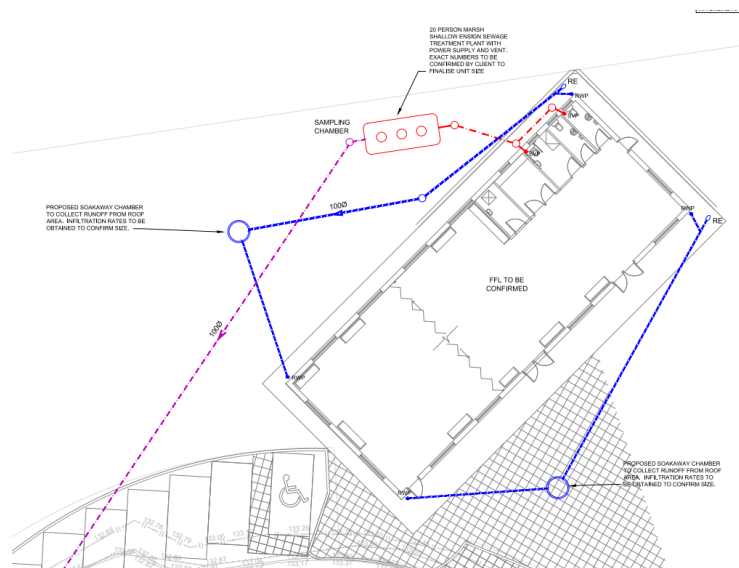
4.8 As detailed above, a condition is recommended regarding the installation of tree protection fencing. Such fencing should also be used on any hedgerows close to the application site given the ecological benefits such features provide. In addition, a condition is recommended to agree the scope of any required external lighting sources. Such a condition is necessary in order to minimise disturbance for nocturnal species such as bats. A number of measures of ecological mitigation are detailed within the submitted appraisal, which include measures to minimise harm to amphibians, mammals and nesting birds during the construction phase.

4.9 A further condition is recommended to ensure construction works proceed in strict accordance with those recommendations. Moreover, the recommended landscaping condition includes additional requirements regarding the submission of biodiversity enhancement measures, as requested by the BwD Ecological Advisor. Subject to compliance with those conditions, the proposed development would be acceptable in relation to ecological considerations.

4.10 Drainage

4.10.1 Further requirements within Policy 9 state that all development proposals must not be subject to an unacceptable risk of flooding, or adversely contribute to the risk of off-site flooding. Adequate drainage provisions should also be provided that accord with national guidance. In support of those requirements, a Drainage Strategy has been provided. Surface water would be drained via a pair of soakaways that stagger the proposed building. Foul water would be cleansed through a package treatment plant and then diverted to an existing drain within the internal highway network. A plan of the Drainage Strategy is detailed below.

Figure Seven – Submitted Drainage Strategy



4.10.2 BwD Drainage have reviewed the submitted Drainage Strategy and merits of the proposals as a whole. No objections have been raised, subject to the imposition of a condition to agree the technical details of the soakaway system to be installed, which is recommended. A further condition is recommended to ensure foul waters are drained in accordance with the submitted details. Subject to compliance with those conditions, the proposed development would be acceptable in relation to drainage, in accordance with Policy 9.

4.11 Coal Mining

4.11.1 The site falls within a high-risk area for former coal mining activity. Further requirements within Policy 8 state that in the case of potentially unstable land, a land remediation scheme must be secured which provides a safe environment for future site users. The Coal Authority has reviewed the merits of the application and a formal objection was initially made in the absence of a Coal Mining Risk Assessment.

4.11.2 Such an assessment has subsequently been submitted, which concludes;

At this stage, the site is considered low risk and a watching brief for evidence of mining shall be carried out during site works. The development comprises a modular building with relatively light loading. There will be no "traditional" in ground foundations. Subject to a clear "watching brief" then a reinforced foundation such as a raft below a basal slab is considered acceptable. The raft foundation may be underlain by a gas ventilation layer to allow any mine gas to diffuse to atmosphere. A gas membrane may be fitted below the screed if required, for example if there is a viable gas migration pathway into the modular building following the slab / raft design. Therefore, LKC consider the study site should be capable of being made safe and stable to meet the requirements of national planning policy with regard to development on unstable land.

4.11.3 Having reviewed the submitted assessment, the Coal Authority has removed their objection and no conditions have been advised. As proposed, the development is thus acceptable in relation to coal mining, in accordance with Policy 8.

4.12 Minerals Safeguarding

4.12.1 The application site is positioned within an allocated Minerals Safeguarding Area. There are no policies in the development plan to regulate such activity. That said, Parts 1 and 2 of the Joint Lancashire Minerals and Waste Local Plan should be applied when assessing such matters. In response to those requirements, a Mineral Resource Assessment has been submitted, which concludes;

The site is located within a Mineral Safeguarding Area for sandstone and coal. If coal and sandstone are present below the proposed development site, it would not be practical or economical recover those deposits via conventional quarrying or mining methods due to sensitive nature of the current and surrounding site use. The site therefore meets the requirements of Criterion 1 of the mineral safeguarding policy and criterion 5 of Policy M2, therefore the proposed development is acceptable in a Mineral Safeguarding Area

4.12.2 Such an assessment is adequate to demonstrate that minerals extraction from the site not viable and the proposed development is acceptable in relation to Minerals Safeguarding.

4.13 Summary

4.13.1 This application involves the erection of single-storey building to be used as a prayer room in support of funerals. An extended parking area would also be provided adjacent to the building together with soft landscaping. Subject to appropriate conditions, the proposed development would be acceptable on all the relevant planning grounds, in accordance with the policies and guidance notes detailed in Section 3.4.

4.13.2 Section 38 of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. Subject to appropriate conditions, the proposal would be acceptable in terms of impacts on the green belt, design and visual amenity, residential amenity, highways and parking, arboricultural considerations, ecological considerations, drainage, coal mining, and minerals safeguarding.

4.13.3 The development therefore complies with the development plan. There is a positive presumption in favour of approving the development and there are no material reasons to object to the application.

5.0 RECOMMENDATION:

That delegated authority is given to the Strategic Director of Place to approve planning permission, subject to the following conditions and informative note.

1. The development hereby permitted shall be begun before the expiration of three years from the date of this planning permission.

REASON: Required to be imposed pursuant to Section 51 of the Planning and Compulsory Purchase Act 2004.

2. Unless explicitly required by condition within this consent, the development hereby permitted shall be carried out in complete accordance with the proposals as detailed on drawings: Location Plan (BS CA/21-22 0023 02 – Revision B), BS CA/21-22 0023 01 – Revision A and BS CA/21-22 0023 03 – Revision B.

REASON: For the avoidance of doubt and to clarify which plans are relevant to the consent.

3. No development shall commence on site unless and until, a Tree Protection Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include protection measures for all the trees to be retained within the site and along the site boundaries and it shall be strictly adhered to throughout the construction phase.

REASON: In order to minimise damage to trees during construction works, in the interests of the green belt and visual amenity, and to comply with the requirements of Policies 3 and 11 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

4. No development shall commence on site unless and until, a detailed landscaping scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include but not be exclusively limited to the following;
 - a) Details of proposals for supplementary landscaping around all aspects of the development;
 - b) Details indicating the location, arrangement, species, sizes, specifications, numbers, and planting densities of all new planting, and;
 - c) Details of biodiversity enhancement measures.

The approved scheme shall be implemented in its entirety within the first available planting season following the substantial completion of the development. Any tree/shrub or other planting that is lost, felled, removed, uprooted, dead, dying or diseased or is substantially damaged within a period of five years thereafter shall be replaced with a specimen of similar species and size, during the first available planting season following the date of loss or damage.

REASON: In order to provide replacement trees on site, in the interests of the green belt, local ecology, and visual amenity, and to comply with the requirements of

Policies 3, 9 and 11 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

5. The external materials to be used for the construction of the development hereby approved shall be as stated on the application form and approved drawings and they shall not be varied within the prior written consent of the Local Planning Authority.

REASON: Those materials are acceptable for the proposed and site, in the interests of visual amenity, and comply with the requirements of Policy 11 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

6. The development hereby approved shall not be brought into use unless and until, the car parking provision as detailed on the approved plan 'BS CA/21-22 0023 03 – Revision B' has been provided in its entirety. Any car parking provided shall thereafter remain in perpetuity with the development.

REASON: In order to ensure car-parking provision is in place to service the development, in the interests of highway safety, and to comply with the requirements of Policy 10 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

7. No development shall commence on site unless and until, a Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be operated in strict accordance with the approved plan.

REASON: In order to minimise congestion within the site, in the interests of highway safety, and to comply with the requirements of Policy 10 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

8. No development shall commence on site unless and until, a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction phase, and it shall provide for, but not be exclusively limited to;

- a) The parking of vehicles of site operatives and visitors;
- b) The loading and unloading of plant and materials;
- c) The storage of plant and materials used in constructing the development;
- d) Wheel washing facilities;
- e) A scheme for recycling/disposing of waste resulting from construction works;
- f) Details of the type, position and height of any required external lighting, and;
- g) Details of working hours.

The development shall thereafter proceed in strict accordance with all of the measures detailed within the submitted Construction Method Statement, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to control the logistics of the construction phase, in the interests of highway safety, and to comply with the requirements of Policy 10 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

9. Prior to the commencement of any above ground works on site, a motorcycle parking and covered cycle storage scheme shall have been submitted to and approved in writing by the Local Planning Authority. The development hereby approved shall not be brought into use until the agreed scheme has been provided in its entirety.

REASON: In order to encourage modes of transport that do not require parking provision, in the interests of minimising congestion, and to comply with the requirements of Policy 10 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

10. Prior to their installation, details overviewing the types, positions and heights of any new external light sources to be incorporated as part of the development hereby approved, shall have first been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter proceed in strict accordance with the agreed details, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to minimise disturbance for nocturnal species, in the interests of local ecology, and to comply with the requirements of Policy 9 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

11. The development hereby approved shall be implemented in strict accordance with all of the measures of ecological mitigation detailed within the submitted Preliminary Ecological Appraisal, prepared by Bowland Ecology and dated November 2021.

REASON: In order to minimise harm to ecological populations, in the interests of local ecology, and to comply with the requirements of Policy 9 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

12. Prior to their installation, details confirming the type of soakaway systems to be used, together with the relevant infiltration tests, shall have first been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be implemented in strict accordance with the agreed details.

REASON: In order to ensure adequate surface water drainage systems are put in place to service the development, in the interests of minimising flooding, and to comply with the requirements of Policy 9 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

13. The development hereby approved shall not be brought into use unless and until, the foul water drainage system as detailed on the submitted Drainage Strategy has been installed. The measures provided shall thereafter remain in perpetuity with the development.

REASON: In order to ensure adequate foul water drainage systems are put in place, in the interests of public health, and to comply with the requirements of Policies 8 and 9 of the Blackburn with Darwen Borough Council Local Plan Part 2, Site Allocations and Development Management Policies (Adopted 2015).

Specific Informative

1. The active nests of all wild birds are protected under the Wildlife & Countryside Act 1981 (As amended). An active nest is one being built, containing eggs or chicks, or on which fledged chicks are still dependent. All clearance, conversion and demolition work in association with the approved scheme shall be carried out outside of the bird nesting season which runs from March to September inclusive. If it is necessary for work to commence in the nesting season then a pre-commencement inspection of the vegetation and buildings for active bird nests should be carried out. If vegetation cannot be clearly seen to be clear of bird's nests then an experienced ecologist should be called in to carry out the check. Only if there are no active nests present should work be allowed to commence.

6.0 RELEVANT PLANNING HISTORY

- 6.1 10/04/0007 – Extension to prayer shelter – Approved with conditions – February 2004.
- 6.2 10/11/0616 – Cemetery, with associated ground modelling, drainage, paths, access structures and carriageways, car parking, landscaping and boundary treatments and ancillary memorialism – Approved, with conditions – November 2021.

7.0 CONSULTATIONS

- 7.1 BwD Highways – In summary, we offer no objections to the application, subject to the conditions detailed below being attached.

(Parking/Access/Layout) In accordance with the adopted parking standards, we have assessed the application against a D1 use for Places of Worship (1 car space per 10sqm). This generates an allowance of 23 spaces. Although only 7 spaces have been provided within this submission, we recognise there is an existing car park (approved under previously approved application 10/11/0616) which is within a reasonable walking distance of this building. This supports and offers parking for all users/visitors to the cemetery.

The details received in support of the application present a 44 space car park area within walking distance from the building. With the addition of further layby parking between the site and the additional parking proposed, we are of the opinion that there is sufficient parking within the grounds to support and facilitate large congregational/burial gatherings, should the need arise. The

suggestion to create a one way circulatory route to aid traffic management would be welcomed.

Please could we attach a condition for a traffic management plan to be submitted for approval and implemented? The marshalling of vehicles by the BMBS for burial events is also acknowledged and welcomed.

There is no Provision for cycle and PTW offered within the site. Please could we attach a condition for this to be provided for general use by all near the new building, this are should be covered and secure.

(Other) A Construction Method Statement is required, please condition. Any old entrances no longer required will require closing and formally reinstating back to full footway. Contact to be made with our Structures Division prior to commencement of any works affecting retaining walls/ structure adjacent to/abutting or within the adopted highway. Prior to any work commencing that affects the existing adopted highway contact to be made with the Local Highway Authorities office on Tel: 01254 273838 to undertake a condition survey.

- 7.2 BwD Arboricultural Advisor – No Arboricultural Impact Assessment has been provided with this application. Having read the Design Access Statement and the Ecology Appraisal, it appears that trees are to be removed, possibly some mature Oaks.

(Update) In principle, there are no objections to the proposals. The submitted tree survey information is accurate and shows a big Alder tree in relatively close proximity to the proposed building. Therefore, we know that the tree will not be damaged during the development phase. An Arboricultural Method Statement that covers tree protective fencing should be provided.

- 7.3 BwD Ecological Advisor – (Submitted details) The submitted report appears to have used reasonable effort to survey the habitats on site and make an assessment of their suitability to support protected/species of principal importance (Section 41, NERC 2006 [Natural Environment & Rural Communities Act]). The survey was conducted in November, which is recognised as suboptimal for the majority of surveys. However, given the nature and size of the proposal this is not considered to be a constraint on the assessment and does not invalidate its findings.

The Report concludes that the site supports a number of trees of value to bat roosting (see figure at Appendix B). This includes Moderate roost potential for T2 & T5 along with low potential for T1, T3, T4 and T6 – T8. The moderate potential trees will require further assessment (para 5.8) if they are to be removed and the low potential trees should be felled using the precautionary approach detailed at paragraph 5.9. This additional work and felling approach can be secured via a condition attached to any permission if granted.

(Conditions) The remaining habitats are of local value to biodiversity. There is currently no known reason to contradict the findings of the Report and the application can be forwarded to determination in respect of biodiversity without

the need for any further work. It is recommended that in order to comply with planning policy a number of conditions/informatives should be attached to any permission if granted, as follows;

- Tree protection of retained hedgerows, trees and scrub to be secured via condition
- Design of the external lighting scheme, in line with the NPPF (July 2021 para 185 c)) we recommend that applicants follow the Institute of Lighting Professionals guidance (01/21 obtrusive lighting and 08/18 wildlife sensitive lighting).
- Breeding birds (section 5.5.1) – Condition that vegetation clearance including trees, shrubs and undergrowth (e.g. bramble) should avoid of the breeding season (March – August inclusive) unless it can be demonstrated that there is no nesting activity present. All wild birds are protected whilst nesting (Wildlife & Countryside Act 1981).
- Amphibian and small mammal Reasonable Avoidance Measures – The Report recommends however, that a RAMS approach would be suitable for site clearance. The guidance provided at section 5.13 and 5.17 of the submitted Report should be adhered to in the clearance of the site including the removal of any log piles etc. This can be secured via a condition.
- Landscape Specification – The details of a biodiversity enhancement plan for species should be included within a landscape scheme to be submitted via condition.

(Biodiversity Net Gain) The Report indicates that the scheme need not comply with the emerging Environment Act (Nov 2020) and GMEU concur with this assessment notwithstanding the guidance above regarding species biodiversity enhancement which is not specifically covered in the Act.

- 7.4 BwD Drainage – No objections. Should this application be approved, a condition should be imposed to agree the design details for the proposed soakaway, including infiltration tests. Such a conditions is necessary to ensure that the development is not at risk of flooding, does not increase flood risk elsewhere, and to ensure adequate measures are put in place for the disposal of surface water.
- 7.5 BwD Property Services – No objections.
- 7.6 The Coal Authority – We have reviewed the site location plans, the proposals and the supporting information submitted and available to view on the LPA website. We can confirm that the site falls within the defined Development High Risk Area and that a Coal Mining Risk Assessment, or equivalent report, is required to be submitted to support this application.

The Coal Authority records indicate the application site lies in an area of coal outcrops which may have been subject to historic unrecorded workings at shallow depth. If shallow coal workings are present these may pose a potential risk to surface stability and public safety.

In accordance with the agreed risk-based approach to development management in the defined Development High Risk Areas, the applicant should be informed that they need to submit a Coal Mining Risk Assessment Report, or equivalent report, to support this planning application. As no relevant information has been submitted at this time the Coal Authority objects to this planning application.

(Update) The Coal Authority considers that the content and conclusions of the Coal Mining Risk Assessment Report are sufficient for the purposes of the planning system and meets the requirements of NPPF in demonstrating that the application site is, or can be made, safe and stable for the proposed development. The Coal Authority therefore has no objection to the proposed development. However, further more detailed considerations of ground conditions and/or foundation design may be required as part of any subsequent building regulations application.

- 7.7 Pleasington Parish Council – We firstly refer to the fact that the proposed development is in a "Multifaith" area of the cemetery. Multifaith, by definition, should be kept for all denominations, buried next to one another and not in segregated areas. There are many people who have purchased a burial plot based on the understanding that this part of the cemetery is designated as a Multifaith area and not as the segregated area implied by this application. Should notices have been placed prominently in the cemetery itself so that people with relatives buried there are made aware of the planned development?

It is not clear whether the child section of the cemetery is to be affected by this application. There are already children buried in this area - are the families of these children to be advised of any changes? The application indicates a car park and Prayer Room in a Multifaith area but the building again appears to be specific to the Muslim faith. There is another area shown on the cemetery maps as a Muslim area, which appears to be currently underused, and with a car park already at that end of the cemetery. Could any Prayer Room not be built there?

The suggestion of making the Prayer Room from the same materials as the previous building, so that it "fits in with the surroundings" does not seem justified. The red brick does not harmonise, nor is it sympathetic to the woodland area. There are far better natural materials which could have been considered. The Prayer Room is 25m long and 9m wide, and would have a massive visual impact on the area. In addition, we cannot see the relevance of matching another facility, which is at least 300m away.

The area concerned is currently one of peaceful reflection, with an open aspect and woodland surroundings, and is within the green belt. The Prayer Room Building in our opinion would totally conflict with this, and with the whole purpose of the green belt.

With regards to extra traffic generated in the area, a one-way system is apparently to be introduced but, since the existing system doesn't seem to be enforced, is unlikely to do much to alleviate the parking and traffic management

problems which exist at present, and would be exacerbated by this development. Traffic management has long been a problem at the cemetery and this application would only make matters a lot worse.

7.8 Ward Cllrs – Councillor Russell has objected to the proposed development (see Section 10 below).

7.9 Summary of Public Responses – detailed responses in Section 10 below.

- The submitted information makes no reference to burial arrangements;
- An inadequate amount of land is available for future burials;
- The design of the building is not in keeping with the area;
- Inappropriate construction materials are proposed;
- Disturbance may be caused for existing site users;
- Congestion may be caused within the cemetery;
- The site has inadequate parking for the proposals;
- The proposed Prayer Room is predominantly for usage by the Muslim community but is located nearest to multi-faith sections of the cemetery.
- There already is a very large muslim section in the cemetery which could accommodate the Prayer Room and associated parking.
- It is not clear whether the Child section of the cemetery is to be affected by this application.
- Impact of additional traffic and parking would reduce the area available for burial ground and disturb unnecessarily the peace and tranquillity which is characteristic of the multi-faith burial ground in particular.
- Unnecessary over development on the cemetery on an ecological sensitive site.
- Memorial trees may need to be relocated.
- In the case of a public utility such as a cemetery, the people who are impacted such as this, are those people that have deceased relatives who have been buried, cremated, have memorials, have memorial trees or memorial benches, particularly in this multi-faith burial ground. Seeking comments from such people would not have been difficult to achieve.
- Lack of consultation during the planning application process.

7.10. With regards to the latter objection, in terms of the planning consultation process, the planning application has been publicised in accordance with Article 15 “publicity of applications for planning permission” of the Town & Country Planning (Development Management Procedure)(England) Order 2015. Article 15(4) requires applications to be publicised by *site notices displayed in at least one place on or near the land to which the application relates, or by serving a notice (neighbour letter) on any adjoining owner or occupier*. [my emphasis]. A press notice was not required as the application is not a “major” application and no public right of way is affected by the proposal. As stated in paragraph 2.2 above, the proposed development has been publicised through letters to residents of the adjacent residential property i.e Lower Fold Farm. Site notices were displayed outside of the application site on a stone post, and at the main entrance point from Tower Road on the 26th January 2022. See case officer photographs below:



Site notice posted on stone post adjacent to application site.



Site notice posted on timber post at main entrance to Tower Road adjacent to newly formed footpath.

7.12 It is considered that the publication of the planning application complies with the requirements of the said Article in the Procedure Order.

8.0 CONTACT OFFICER: Christian Barton – Planning Officer

9.0 DATE PREPARED: 8th February 2022

10.0 SUMMARY OF REPRESENTATIONS

Councillor Mark Russell, 19 Feniscliffe Drive, Blackburn, received 8th February 2022:

I would like to object to the planning application for a new Prayer Room at Pleasington Cemetery.

There is insufficient detail provided for the Planning Committee to come to an informed decision - there is no proposed capacity for the new facility and therefore it is not possible to assess the parking provision required

Notwithstanding the above, what is clear is that the proposed car parking provision will be inadequate. The road is too narrow to accommodate the volume of cars that will be parked along it when the prayer facility is in use. The resultant inconvenience to other users of the cemetery will be unacceptable.

The proposed Prayer Room is predominantly for usage by the Muslim community but is located nearest to multi-faith sections of the cemetery. This will cause more people to drive to it, particularly in inclement weather, increasing the inevitable congestion and parking problems around it and inconveniencing visitors who have buried their loved ones in the nearby multi-faith sections.

The nearest Muslim burial section is relatively small and not large enough to justify spending £325,000 of taxpayer money on a new prayer facility to predominantly service it.

Additionally, the proposed facility will unnecessarily destroy a copse that provides valuable habitat for small mammals and birds.

Regards,

Cllr Mark Russell
19 Feniscliffe Drive

Objection – Garry Westwell, Unknown address, Received 10th January 2022

Dear Sirs

It would appear from various newspaper articles plans have been quietly passed by Blackburn Borough Labour Councillors to build a heated muslim prayer room with toilets in the new section of Pleasington Cemetery in Blackburn Lancashire.

In addition to this, muslim burials will also be serviced in the new extension along with new car park arrangements.

There has been absolutely no communication about this and there has been zero transparency. Absolutely no consideration has been given to the relatives who already have loved ones buried.

This plan will make the small loop road and the road up to the crematorium congested with traffic that it was never designed for, in addition to the huge increase in pedestrians in this area.

I believe that this plan is wholly inappropriate and the council should source another site for this.

These plans are morally wrong and are offensive to say the least and I would also request to see a copy of the plans.

I very strongly object in the strongest possible way to these plans and I will of course be raising my objections with the MP for Blackburn.

I will also be making people who have loved ones buried in the proposed area aware of these plans with a view that they will also object to these outrageous plans..

Kind Regards

Garry Westwell

Objection – Eileen Smith, Clerk to Pleasington Parish Council, Received 11th January 2022

Pleasington Parish Council wish to strongly object to this application.

We firstly refer to the fact that the proposed development is in a "Multifaith" area of the cemetery. Multifaith, by definition, should be kept for all denominations, buried next to one another and not in segregated areas. There are many people who have purchased a burial plot based on the understanding that this part of the cemetery is designated as a Multifaith area and not as the segregated area implied by this application. Should notices have been placed prominently in the cemetery itself so that people with relatives buried there are made aware of the planned development ?

It is not clear whether the Child section of the cemetery is to be affected by this application. There are already children buried in this area - are the families of these children to be advised of any changes ?

The application indicates a car park and Prayer Room in a Multifaith area but the building again appears to be specific to the Muslim faith. There is another area shown on the cemetery maps as a Muslim area which appears to be currently underused, and with a car park already at that end of the cemetery could any Prayer Room not be built there?

The suggestion of making the Prayer Room from the same materials as the previous building, so that it " fits in with the surroundings" does not seem justified. The red brick does not harmonise, nor is it sympathetic to the woodland area. There are far better natural materials which could have been considered. The Prayer Room is 25m long, and 9m wide, and would have a massive visual impact on the area. Also we cannot see the relevance of matching another facility which is at least 300m away.

The area concerned is currently one of peaceful reflection, with an open aspect and woodland surroundings, and is within the Green Belt. The Prayer Room Building in our opinion would totally conflict with this, and with the whole purpose of the Green Belt.

With regards to extra traffic generated in the area, a one-way system is apparently to be introduced but, since the existing system doesn't seem to be enforced, is unlikely to do much to alleviate the parking and traffic management problems which exist at present, and would be exacerbated by this development. Traffic management has long been a problem at the cemetery and this application would only make matters a lot worse.

Objection – Jeanette Fish, 53 Selbourne St, Blackburn, Received 21st January 2022

I would like to put my objection forward to planning application ref 10/21/1393.

Under the following grounds

1: Road safety

The development may lead to a significant impact upon road safety due to the fact traffic congestion would occur as the road is very narrow and even if the traffic was made into one way access, which it mainly follows already this would not relieve the congestion that would be caused with the significant increase in traffic.

2: The size of the planned area for the burials is surely far too small and will be filled in a very short time. Surely to put all this time and money into building a new prayer room and space for parking would not be cost effective. A larger plot of land with scope to last longer into the future should surely be sourced to make it more viable in cost and longevity terms.

3: Noise disturbance

Unacceptable intrusion in the form of noise nuisance and general disturbance.

Anyone visiting existing gravesides and tree plots who will be trying to spend quiet , quality time thinking of their loved ones are going to be disturbed with high levels of traffic noise also there will be traffic wardens using walkie-talkies and a possible problem with high levels of people in the area during use of the prayer room with the road being so narrow there could be an overflow of people walking on the grass area near surrounding existing plots again causing congestion and possible damage to tree plots.

4: Existing Tree plots in the planned area.

There are several existing tree plots already in the proposed area , what is going to happen to these , surely they aren't going to be moved , the distress this would cause relatives is unfounded .

If the objection is upheld and a meeting is put in place to discuss these points i would very much like to be included in the discussions and be able to speak in person.

Regards
Jeanette Fish

Objection – Alan Westwell, 89 Warrenside Close, Blackburn, Received 26th January 2022

Good afternoon Christian,

I spoke with you last Friday regarding some of my concerns regarding the extension of the grounds intended for re structure.

I have received a copy of the plans regarding this and also the colour coded map of the cemetery grounds.

The thing I did notice was the yellow coloured area "Z" for Muslim use situated at the end of the approach road to the extended area on the right hand side just before the roundabout.

Having passed that point quite frequently I can see that nothing is taking place on that area of land.

<https://www.blackburn.gov.uk/pleasington-cemetery>

Is this area of land earmarked for possible use in the very near future to coincide with the first application for planning New Prayer room and

Car parking. Are you able to provide plans for the proposed burial area in order for me to complete and forward my observations on this matter.

Kind regards

Alan. Westwell

Objection – Dianne Finch, Unknown address, Received 27th January 2022

I would like to put my objection forward to the planning application ref. 10/21/1393 for the following reasons :-

1) Shortages of Carparking Bays.

The planning application reads there is already several parking bays in the proposed area, this is incorrect as there are only possibly three. The Chaos this will cause with very limited parking space will be enormous and there will be disruption and lack of safety to this smaller One Way burial land.

2) Existing land (not used)

There is a larger plot of land which at the moment is a Car Park which is never used.

Why has this unused Car Park not been considered for -

a) Muslim prayer room

b) Burial plots

c) Car Parking area.

3) Existing plots.

There are several tree plots already in the area proposed for Muslim prayer room & burial area. I hope that these are being taken into consideration and that the family's have been advised of the proposed plans ?

4) Larger land: The proposed land is too small for a prayer room and burial plots, once this area is full & no other land available what will happen. A bigger plot of land that will last much longer and not cause Chaos & Disruption needs to be found.

5) Safety & Disruption: The family's who visit their loved one's in this area will see disruption when large amounts of cars attending funerals will be parked anywhere, grass verges in front of headstones even possibly damaging them which will cause distress to relatives. Please could you keep me informed of any future developments and meetings which if possible I would attend regarding this proposal.

Regards

Dianne Finch

Janet Coupe, Unknown Address – received 6th February 2022:

Good morning

After seeing a notice at the Pleasington cemetery for a new prayer house development I am concerned about a number of points:

1. What investigations have there been into the likely impact to the local habitats and ecosystems in the area? E.g. I believe that hedgehogs reside in the area which are a protected species by Wild Mammals protection act 1996 and the Wildlife Countryside Act 1981. There are also foxes, deer and birds in the area.
2. Has the likely impact on the environment also been assessed in the light of the wider recent development locally? If so please could you provide me with details of the findings?
3. There is the question of the likely impact of further increased traffic also. The amount of traffic in the cemetery recently, I believe, has increased enormously, and local residents have borne witness to this. Have there been studies of any impact of further increases in traffic? E.g. Last year a ninety year old man collapsed by his wife's grave and an ambulance was called to the scene. My concern is that the ambulance would be unable to reach anyone in such a situation in the future if cars are left unattended on the narrow cemetery road.
4. I believe the prayer house development is a multi faith building. Have all local faith bodies and churches been consulted in regard to the character and contents of the building. E.g. Will there be a cross, tea lights and altar included?

Kind regards

Janet Coupe

Laura Dodd, 21 Meadow Vale, Blackburn – received 4th February 2022:

Dear Sir

I am writing to strongly object to the construction of a Prayer Room facility including soft landscaping works and associated parking.

There already is a very large muslim section in the cemetery which I am sure could accomodate the Prayer Room and associated parking.

I also noticed that the Planning Notice is placed in such a way that if you are not aware of it, it would be missed. I wonder if that is in the hope that not too many people will object therefore it will be passed with no problems?

The building and parking area proposed will spoil the aesthetic appeal of the area.

Yours sincerely
Laura Dodd
21 Meadow Vale
Blackburn
BB2 4UA

Further comments from Garry Westwell, unknown address – received 7th February 2022:

Dear Mr Barton

I have returned from Pleasington Cemetery today after seeing this pathetic attempt at a 'public notice' to make visitors aware of the proposed plans.

I find the slap dash approach very offensive, clearly nobody at the council thinks this issue warrants an appropriate notice.

How can you condone this as acceptable to put a sheet of A4 paper into a Poly Pocket sheet which is not even designed to be outside and then pin it to a post where nobody can see it?

There should be clear and concise notices placed in various places where people can view these and not placed somewhere that it easily missed. Why are the notices not placed near to the parking areas or by the water taps? In my opinion, the one notice has been placed where it is in the hope that it will not be seen.

This whole process with the proposed prayer room and burial site has been orchestrated in what appears to be a very secretive manner and as a taxpayer, I am entitled to complete transparency which is far from what has been happening.

Kind Regards

Garry Westwell

Further comments from Alan Westwell, 89 Warrenside Close, Blackburn – received 7th February 2022:

Attached is just ONE very poor attempt to display a notice placed in the new section of Pleasington cemetery in the last few days.

(New Drawing Pins) & (Sellotaped round a small wooden post). Not placed in readable position without bending down that's if you spot it and not to mention a little weather torn through not being in a more substantial protective display. Last minute rush? Notices of this nature should be placed at various points around the new section properly sited and clear to read.

Kind regards

Alan Westwell



Further comments from Alan Westwell, 89 Warrenside Close, Blackburn – received 7th February 2022:

Hi Christian, please would you mind forwarding these further comments on for me, re planning application Pleasington Cemetery.

I have sent a copy of my objections to the planning department at Blackburn previously. Just a couple of further observations I would like to mention are that the colour coded plan for the whole cemetery indicates sections for separate religious denominations.

Were Muslims are shown in yellow and described together with Christian sites as “predominant use” which I do not think is the case. When you look at the whole plan. It is Christian denominations who have predominant use of the Cemetery by land used. Relatives, friends visiting and buried Christians on site make it predominant.

The new top section of the Cemetery is now labelled multi faith use. This I’m sure was not the case on the initial plan.

Now craftily members of the council have seen fit to changed to multi faith on that section to help with their applications of the two separate plans to be approved. 1. Facilities and 2. Use.

Why from a time in the past by were Catholic, Protestant, and Muslim laid to rest separately in those sections, has the council taken it upon themselves to now change things to multi faith use to suit their application. This is not right for future generations of Christians who already have relatives buried on the new section they will not have sufficient spaces for them to plan to be laid to rest there. Have there been any involvement of religious bodies to make comments on these proposals?

My wife was laid to rest there last year and had I known of these plans I would have sought elsewhere for her. My family are also of the same mind.

There has been the lack of transparency by the Council for them to implement this change to the Cemetery grounds.

Why were denominations separated in the first place? The proposed plans are not fit for purpose and I recommend another site be sourced. Another area which would suit would be land prior to the cemetery entrance which would be very near to the existing main Muslim site. That area could be closed off from public activities, trees and shrubs planted and the gates re positioned. There is also a ready made car park fit for purpose.

Lastly why are all these facilities being proposed for the Muslim community, these very same facilities were not offered previously to the Christian community, did the council not put the same thought into it.

Kind regards

Alan Westwell

Mr Jack Robinson and Mrs Helene Robinson, Braemar, Bowden Avenue, Pleasington, received 8th February 2022:

Dear Sirs.

I submit the following comments on Planning application No 10/21/1393

Re: Construction of a new prayer room facility including soft landscaping and associated parking.

1. The proposal duplicates an existing prayer room facility and its associated parking. The existing prayer room facility is approximately 750m away from the proposed new facility. (See Key Map of Pleasington Cemetery showing location of existing prayer room).
2. The proposed facility is in a designated Green Belt R19 area; like the existing prayer room and parking. (See Blackburn with Darwen Local Plan 2021-2037) **This constitutes an unnecessary over development of the cemetery on an ecologically sensitive site. Two Prayer Rooms on one site are not necessary.**
3. Normally building work proposed in any Green Belt shall be regarded as inappropriate and should not be approved except in very special circumstances: especially in an area of SSSI. having BHS, LNR and HPI. (See Blackburn with Darwen Local Plan 2021-2037) What are the very special circumstances that support two Prayer Rooms.?
4. However, buildings in a cemetery are exceptions to this rule, but nevertheless should require a robust justification and impact assessment.
5. A justification for the new prayer room facility is not provided by any of the documents submitted with the Planning Application. The existing Prayer Room is currently used exclusively for Muslim faith burials and continues to be capable of providing the required facilities for the Muslim community at Pleasington Cemetery.
6. Among the supporting documents for the proposal, there is an impact assessment, "Preliminary Ecological Appraisal" dated November 2021. **The text of the report continually references a "new crematorium" or "new crematorium building" instead of a new prayer room, its associated sewage treatment plant and the car parking.**

7. The "Preliminary Ecological Appraisal" document should be revisited and re-evaluated to assess the impact of a second prayer room, which potentially will be capable of accommodating over a 100 people along with the additional car parking that is deemed necessary. This was not addressed by the Ecological Appraisal and is misleading in terms of the potential problems it addressed. Presumably, the environmental impact of the existing crematorium was appraised many years ago? The new sewage treatment may require Environmental Agency exemption?
8. The text of the Design and Access Statement to Support Planning Application document states the objective of the development as:- quote
"to provide a new prayer room facility, which will be predominantly used by the Muslim community. The building will be sited within close proximity to designated Muslim burial ground" .
The closest designated Muslim burial ground is at Key Map reference "Z" , which is approximately 250m South West of the proposed additional Prayer Room.
The Design and Access document shows the proposed location of the additional Prayer Room to be amidst an area of the cemetery designated for the burial of children and multi-faith burials. (See Key Map of Pleasington Cemetery.)
- The activity associated with the added Prayer Room, the additional car parking and the associated sewage treatment plant will have a negative impact not only on the local ecology, but also, those who are visiting the graves and memorials of buried children, buried adults and cremated persons of multi-faith.
9. Access by car for disabled visitors to the Childrens and Multi-faith burial grounds is gained by following the same access proposed for the new Prayer Room. The current access route is already a one way system. Much of the current limited parking on the one way system is designated for disabled users only. The access route is also frequently used by on-site maintenance staff and mechanical grave digging/grass cutting equipment.
The proposed location of the new Prayer Room therefore has negative implications for parking, traffic management and road access for all users/visitors to the multi-faith burial ground. This is acknowledged in the Design and Access Statement.
Also the proposed location has negative implications for visitors to the cremation memorial section and those relatives who have planted memorial trees, and have memorial benches in this area of Pleasington Cemetery, as well as those visiting the new Prayer Room and dog walkers.

10. By definition a cemetery is for burial, cremation, mourning and remembrance of those who have passed away.

At present, Pleasington Cemetery strikes a good balance, which is achieved by separating the areas given over exclusively for burial, cremation, mourning and remembrance from those areas dedicated for car parking and access routes.

The current policy maximises the area available for burial purposes and is achieved by the separation of cars and car parking away from ground for burial. This has a secondary but valued consequence. It contributes to an ambience of tranquillity, peace and rest, which most people of faith or no faith seek, whether dead or alive, mourning, praying or remembering.

The car parking arrangements proposed by the Design and Access Statement to Support Planning Application include quote: "Several roadside parking bays already exist which can be utilized by cemetery users, it would be favorable to create additional parking bays around the access road where possible."

The impact of this additional traffic and parking would reduce the area available for burial ground and disturb unnecessarily the peace and tranquillity, which is characteristic of the multi-faith burial ground in particular.

11. Notification of the registration of this Planning Application 10/21/1393 has been given to three "neighbours" all of whom are legally required to be informed.

This is done usually to ensure that they have no objections.

There is no record of First Site Notices having been issued.

However, in the case of a public utility such as a Cemetery, the people who are impacted by proposals, such as this, are those people that have deceased relatives who have been buried, cremated, have memorials, have memorial trees or memorial benches; particularly in this multi-faith burial ground.

Seeking comments from such people would not have been difficult to achieve.

I suggest that this Planning Application should not progress until; those who have any of the above listed items on site have been advised of the proposal under consideration by the Planning department.

Many of these people have paid a lot of money to install a memorial in Pleasington Cemetery and deserve to be advised of the proposed changes.

-----The comment below is not applicable directly to the Planning Application-----

A further point which has arisen from the reports associated with this Planning Application and produced for the ground conditions surveys, including minerals etc, is the fact that part of the burial grounds sit on coal seams. Which does not seem to disturb the experts, especially in the case of the proposed new Praying Room.

This fact plus the obvious lack of an area in Pleasington Cemetery, which is suitable to be dedicated exclusively as a Muslim burial ground, should be addressed by those responsible as a matter of extreme urgency; rather than the construction of an unnecessary prayer room with only a very limited dedicated places available to bury the deceased of our Muslim community.