

Policy Approaches to Planning for Cemeteries in Halton Region

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Introduction

Death is an inevitable component of life. Consequently, there is a need to dedicate land for the use of honouring and disposing of our dead. Cemeteries meet those needs, and as a result can be considered essential to our social infrastructure (Larkin, 2011). Despite this, cemeteries are often overlooked in land use planning policy. The tendency is to emphasize other land uses such as residential and economic growth in order to meet housing and employment needs, while cemeteries remain an afterthought (Basmajian & Coutts, 2010; Larkin, 2011). This is no better exemplified than in Halton Region, where the population is expected to double over the next 20 years. For the most part, Halton Region's approach to planning focuses on developing policies that best direct growth and accommodate a larger population, while preserving the Region's agricultural and natural heritage systems. An increased need for more cemetery space and cemeteries in Halton Region will accompany the expected growth in population, and it would be prudent of the Region to develop cemetery-specific policies in preparation for this future demand.

Background

Located within the Greater Golden Horseshoe, Halton Region's population is expected to double between the years 2001 to 2031. In response to the Growth Plan for the Greater Golden Horseshoe, Halton Region created their regional growth management strategy in 2006, titled 'Sustainable Huron' (Halton Region, n.d.). As part of a conformity exercise with the Growth Plan, Sustainable Halton led to the Region participating in a comprehensive review of their Regional Official Plan (ROP). The result led to two Official Plan Amendments: ROPA 37 and 38 (Halton Region, n.d.). Together with Halton Region's projected population growth, it is expected

that a corresponding need for cemeteries will occur. To meet future need, Memorial Gardens Canada Limited (“Memorial Gardens”), owner of two existing cemeteries in Halton Region, explored options for cemetery development within the Region. Memorial Gardens’ pursuit for future cemetery options led to their appeal of ROPA 38 at the Ontario Municipal Board (OMB) on the basis that there are a lack of policies that guide and permit cemetery development in Halton Region. Their arguments for the addition of policies in relation to cemetery development are based on the following (Fasken Martineau DuMoulin, 2011):

- Cemeteries are a necessary and important land use, integral to our social infrastructure;
- Despite this, they are preferably located in rural areas, because,
 - They are typically 20-40 ha (50-100 acres) in size, and,
 - They require limited services making them inefficient users of public infrastructure;
- Cemeteries are compatible with most urban and rural land uses, and can be designed as parks and natural spaces to compliment surrounding communities;
- Once established, cemeteries represent a permanent land use and are very rarely converted to another use;
- Current growth projections focus on determining the amount of land needed to accommodate future growth, while mortality rates and spatial requirements to accommodate the dead have been ignored;
- Any land use policy regarding cemeteries focuses on existing cemeteries, ignoring potential cemeteries;
- In general, there are few municipal planning policies that identify potential locations for new cemeteries;

- Current provincial planning based on 20-year horizons is not conducive to the 100-year horizons cemeteries are typically based on; and,
- Failure to recognize cemeteries or provide policies related to cemeteries in the ROP is considered poor planning.

Through their appeal to the OMB, Memorial Gardens has asked that Halton Region address this oversight within their ROP, and provide policies related to the establishment and location of lands for future cemetery purposes.

Objectives

The purpose of this study is to assist Halton Region in identifying possible policy approaches to address cemetery and cemetery-related uses in their current ROP review. In order to complete the study, the following objectives have been identified:

- 1) Develop criteria to identify appropriate locations for cemeteries in Halton Region's rural areas;
- 2) Provide recommendations for best planning practices for cemeteries and cemetery-related uses;
- 3) Identify possible policy approaches related to cemetery uses and the location of cemeteries within Halton Region. Criteria and permitted use designations are recommended for each of Halton Region's seven major land use designations.

Best Planning Practices for Cemeteries

Although cemeteries are generally considered compatible with other land uses, numerous concerns arise when planning for them – loss of land, permanence on the landscape, local opposition, and environmental impacts. This section examines the issues that arose within the ROPA 38 and offer approaches to addressing them. Included is a discussion on the importance of cemeteries to their communities, while finding ways to incorporate them into land stewardship opportunities. Just as we plan for roads, infrastructure, community facilities, and services, so to should we plan for cemeteries. The intention is to share these approaches with Halton Region, who in turn can adopt policy and planning mechanisms that address cemetery development and aid them in meeting the needs of their current and future populations.

Locating Cemeteries

Historically, cemeteries have existed on the urban periphery (Bennett & Davies, 2015). This locates cemeteries in close proximity to the populations they serve, while being distant enough to not pose any health concerns. Simultaneously, the urban periphery is ideal for its open space and is often less expensive, while land within urban boundaries is far more valuable for residential or commercial uses (Basmajian & Coutts, 2010). As populations increase, municipal boundaries expand, and cemeteries become surrounded by urban development. The issue then becomes twofold: now located within the urban area, once developable land is ‘locked’ into a long-term use, putting limitations on the expansion of the municipality’s tax base (Basmajian & Coutts, 2010). Where residential or commercial uses would be ideally located, the cemetery is more or less permanent. At the same time, cemeteries are located next to the municipal service infrastructure, but do not make use of these services. Need for servicing in cemeteries is

normally low and private servicing is usually adequate (Larkin, 2011). For these reasons, and given that urban areas are expected to expand beyond the current boundary, it is often difficult to predict the best location for a new cemetery.

The solution in the ROPA 38 appeal has been to locate cemeteries within rural areas, as land within urban areas is limited, expensive, and typically reserved for residential and employment uses. But, simply locating new cemeteries beyond the urban boundary may not be the answer. Deemed essential to the social infrastructure of communities, cemeteries need to be established in accessible locations to meet the needs of the populations they serve (Larkin, 2011). Selecting suitable land for cemeteries continues to be a difficult task, as surrounding land uses will likely change during the lifespan of the cemetery (Relyea, 2013). It is ideal to find a balance between close proximity to communities while not limiting urban development. Likewise, it would be advantageous to design cemeteries in such a way that increases visitation and uses the space more efficiently. Moving forward, it is integral to provide guidelines or policy that will aid in the allocation of future cemetery development.

Social Role of Cemeteries

A cemetery's primary function is to provide a physical space for the memorialization and final resting place of the deceased (Larkin, 2011). But they are not limited to this. Cemeteries can be considered an essential public service that plays an important role in our social infrastructure (Bennett & Davies, 2015). Recently, there has been interest in the variety of functions cemeteries provide to communities. Planned accordingly, cemeteries can contribute to increasingly urban environments by providing attractive green space and passive recreation opportunities.

Basmajian and Coutts (2010) have found that existing cemeteries also provide local historical

and cultural significance, and may offer economic benefits as well. Additionally, Woodthorpe suggests that cemeteries are often compartmentalized as “sites of *either/or* mourning, memory, history, landscape, design and geography”, when in fact they have all of these traits (2011, p. 260). In section 31.4 of Halton’s ROP, “A healthy community is one where a full range of housing, employment, social, health, educational, recreational and cultural opportunities are accessible for all segments of the community...” (2009, p. 8). For the most part, cemeteries can offer almost all of these opportunities to their communities. Rather than plan cemeteries for burial purposes only, ongoing emphasis has been on planning them ‘for the living’, and integrating them within communities.

Permanency on the Landscape

In general, cemeteries are based on 100-year planning horizons, making them difficult to move and difficult to plan (Coutts et al., 2011). Their permanence involves too much uncertainty and does not fit with the 20-year planning horizon that the Province of Ontario typically upholds. At the same time, Dakin (2010) has found a 20-year planning time frame is not conducive to predicting the amount of area a cemetery will need in its lifetime. The question then is how far should we plan ahead? There are two possibilities that have been proposed. Coutts et al. (2011) suggest that a 30-year horizon for projecting the need for burial space would take into account the changing demographics, changes in the built environment, and any societal change in preference related to interment practices. At the end of 30 years, the municipality would have a better understanding of the need for more cemeteries or any shifts in societal preferences. Another option would be to continue with the 100-year horizon, while developing stricter guidance on location selection and on ‘phasing’ development within the cemetery (Dakin, 2010).

On agricultural land, phasing development would allow for the continuance of agricultural uses while sections of the cemetery would be developed for interment purposes as needed. The phasing system would work similarly for any natural areas that may undergo alteration. In reality the planning horizon for cemeteries is limited by the period of time for which accurate population projection data exists. Beyond this point in time the need for cemetery space cannot be accurately assessed.

It has been suggested that the permanency of cemeteries is what makes them valuable in developing regional conservation goals, and efforts should be made to include them in regional green space and land conservation programs (Barrett & Barrett, 2001; Basmajian & Coutts, 2010). Designing cemeteries as conservation land and green space would ultimately contribute to the sustainability of human and natural environment communities, adding to biodiversity and ecological functions. Finding ways to integrate cemeteries within communities and the natural environment would contribute to the ongoing protection and permanence of natural heritage systems and open spaces.

Multi-Use Landscape

Beyond functioning as a final resting place for the deceased, cemeteries have undergone resurgence as multi-use landscapes. According to Basmajian and Coutts (2010), cemeteries can operate as both memorial and recreational space at the same time. Woodthorpe encourages cemeteries to be seen beyond spaces for burial, and to treat them as sites of spiritual pilgrimage, botany, and heritage (2011). They can be designed as park-like settings with walkways, benches, and gardens. Newer cemeteries can also be designed to accommodate activities such as jogging, cycling, picnicking, sledding, and dog walking. Harnik and Merolli (2010) have documented

cemeteries that provide walking tours, photography classes, charity runs, Halloween festivals, and live music and plays. There are a variety of examples throughout the U.S.A. that illustrate the multiple ways that cemeteries are being used. These include manicured and sculpted cemeteries such as Mt. Auburn Cemetery in Cambridge, MA and Greenwood Cemetery in Brooklyn, NY; more recreational-based spaces such as Elmwood Cemetery in Charlotte, NC; or cemeteries that have remained naturally ‘wild’, and act as nature reserves, such as Evergreen Cemetery in Charlotte, NC (Harnik & Merolli, 2010).



Figure 1: Gardens in Mt. Auburn Cemetery, Cambridge, MA (Source: Friends of Mount Auburn)



Figure 2: Roadways used for cycling in Elmwood Cemetery, Charlotte, NC (Source: Google Maps)



Figure 3: Tobogganing in Congressional Cemetery in Washington, D.C. (Source: Harnik & Merolli)

While cemeteries can offer a variety of uses, there is some opposition against allowing activities that are perceived as disrespectful. Cemeteries are often considered separate sacred spaces with the purpose of memorialization and quiet reflection (Rugg, 2000). But, Harnik and Merolli (2010) argue that use of cemeteries as public parks is a more efficient use of open space. Encouraging design meant for multiple uses will attract more visitors and develop cemeteries as community gathering places, in turn broadening their social value.

Local Opposition

While established cemeteries become an accepted part of the urban landscape, a proposal for a new cemetery often faces opposition from local residents (Basmajian & Coutts, 2010). Concerns may arise around the impact on neighbouring property values, or residents may find living next to a burial site inappropriate or unsightly (Capels & Senville, 2006; NEC, 2014). Opposition can be expected, but it simply may not be possible to appease all members of the public. For the most part, Larkin (2011) has found that cemeteries do not decrease neighbouring land values, and may in fact contribute to land value. In this scenario it is essential to emphasize the social and cultural importance of cemeteries, and again, special care should be taken to design cemeteries in such a way that they contribute to their surrounding community and its green infrastructure.

Environmental Concerns

The Niagara Escarpment Commission Cemetery Discussion Paper (NEC, 2014) considers cemeteries for their ecological value, and their ability to contribute to local biodiversity and wildlife habitat. Despite this, there are often concerns over environmental impacts from the development of new cemeteries. The NEC highlights the following concerns (2014):

- Groundwater and soil contamination;
- Traffic and noise pollution;
- Emissions from crematoriums;
- Loss of natural heritage features;
- Loss of developable land; and,
- Spread of invasive species.

For the most part, cemeteries are considered to cause limited or low impact to the surrounding environment. A study by the Ministry of Environment (MOE) in 1992, found that cemeteries were not a significant source of contamination in any nearby groundwater or soil (NEC, 2014). To ensure this continues, the MOE established guidelines in relation to depth of burial and distance from wells and surface water (NEC, 2014). Simultaneously, air pollution from crematoriums has been one of the most contended issues related to new cemetery proposals. Again the MOE has established standards and guidelines in relation to any environmental and health impacts from crematoriums (NEC, 2014).

Careful planning and design that make use of the existing site conditions, rather than altering them, can address concerns around the impacts on natural heritage systems. There are straightforward approaches to protect existing natural features and incorporate them into cemetery design. Examples include regulating tree removal, limiting grading, and maintaining streams and wetland buffers (Basmajian and Coutts, 2010; Relyea, 2013). As suggested, cemeteries can benefit local areas and contribute to green infrastructure – providing buffers, natural linkages, and wildlife habitat. Finally, to address the issue of invasive species, cemetery plantings can include native species of the area (NEC, 2014). Through proper maintenance and care, invasive species will simply not have the opportunity to become permanent on the

landscape. A cemetery planted with native plant and tree species would also contribute to local biodiversity including beneficial insects and wildlife.

Compatibility

The profession of land use planning is often concerned with land use compatibility.

Compatibility concerns arise when there are any '*adverse effects*' or long-term impacts on surrounding facilities or areas (PPS, 2014, p. 13). For the most part, cemeteries are considered compatible with urban and rural land uses and may be considered complimentary to their surrounding areas (Larkin, 2011). Cemeteries function as park-like spaces with gardens and landscaped areas distributed throughout. They can add to their surrounding communities by providing attractive natural space where visitors can sit and enjoy peaceful reflection, or participate in low-impact activities such as walking and jogging. It is essential then that they be designed to be compatible with neighbouring properties. Accommodating a variety of uses adds to the value of the cemetery as a community-gathering place, and ensures that the local residents view it in a more positive light.

Ownership

Over time cemeteries have shifted from religion-based ownership to either private or municipal ownership (Larkin, 2011). In regards to public accessibility, this is not of concern, as privately owned cemeteries generally remain accessible to all. The most pressing issue with ownership of cemeteries is in regards to funding for long-term site maintenance. The current system of offering cemetery plots 'in perpetuity', leads to the closing of cemeteries once all plots have been filled. This limits the ability of cemeteries to generate income in the long-term. Typically, once a

cemetery's capacity is met, maintenance costs fall into the hands of municipalities (Relyea, 2013). Maintenance is often low in priority and expensive, especially for rural municipalities with limited tax bases. To remain relevant as community green space, it is essential that cemeteries are designed attractively and accessibly to encourage visitation long after the cemetery has filled. Developing cemeteries so that they can be used for education or recreation may help in raising funds, and raise their profile as a community resource. Capels and Senville (2006) encourage long-range planning that addresses future maintenance costs. There is a need for further exploration into this matter.

Accommodating Diversity

Like any public service, cemeteries must be planned to accommodate diverse populations. Along with its expected population increase, Halton Region can expect an increase in population diversity, in relation to race, age, religion, and ethnicity. In order to accommodate cultural diversity, new cemeteries should be designed to be flexible in an effort to meet the needs of a variety of burial practices and traditions. Since modern cemeteries are generally large in size, the solution would be to offer decentralized burial, where various cultural, religious, and ethnic groups can have their own space within a cemetery (Basmajian & Coutts, 2010). A successful example of this can be found at any of the Mount Pleasant Group of Cemeteries, including Duffin Meadows in Durham Region (Mount Pleasant Group, 2016a). The Mount Pleasant Group cemeteries offer space for all faiths and cultures, including areas for Chinese, Greek, and Italian communities only. They include a variety of features that meet the needs of many religious and cultural groups (Mount Pleasant Group, 2016a). Accommodating various cultural groups within

large cemeteries lessens the need for smaller cemeteries fragmenting the landscape. This also contributes to cultural intermingling and appreciation.

Alternative Practices of Interment

While traditional cemeteries will continue to remain relevant, alternative interment practices have become increasingly popular and widely accepted (Basmajian & Coutts, 2010). Halton Region should adjust their ROP in response to any cultural shifts and regional development pressures. New cemeteries in the Region should be designed to offer a variety of options in order to adequately service changing attitudes or interment practices. By offering a variety of interment methods, this will encourage more efficient use of cemetery land. Some of the more common alternative practices to in-ground burial that Halton Region should include in their ROP are discussed below.

Mausolea

Mausolea are above ground buildings that provide interment space for the deceased. They are not a new concept. They are often built in existing cemeteries that are limited by space or in locations where space is limited for new cemeteries (Basmajian & Coutts, 2010). Mausolea have the attributes of being less expensive to maintain while providing a similar burial experience to in-ground burial (Coutts et al., 2011). Additionally, since they can be built up in height, mausolea can increase the capacity of a cemetery without occupying as much land. Mausolea are also flexible in where they can be located.

Columbaria

Similar to mausolea, columbaria are used for the storage of cremated remains. Columbaria have the added value of holding thousands of individuals while occupying very little space.

Columbaria have been used extensively in Hong Kong, where space is exceedingly limited (Basmajian & Coutts, 2010). Most often they are simple built structures, but columbaria can take on many forms. For example, Duffin Meadows in Durham Region offers outdoor columbarium and granite curbs that border trees (Mount Pleasant Group, 2016b). As cremation numbers increase, columbaria will be an essential addition to cemeteries in Halton Region.

Scattering Gardens

While columbaria provide a designated space for an individual, scattering gardens are also popular for cremated remains. Scattering gardens are natural or landscaped areas that are used for scattering ashes (Basmajian & Coutts, 2010). Keeping efficient use of land in mind, scattering gardens provide a location for the bereaved to visit, but an individual does not take up “space” within the cemetery.

Grave Sharing

Grave sharing involves digging up older remains that are then planted deeper, followed by placement of new remains on top. Rather than in perpetuity rights, grave sharing is based on renewable rights with terms between 25 and 99 years (Bennett & Davies, 2015). After tenure expires, the site can then be reused for later generations. Grave sharing allows cemeteries to have continual cash flow that can be used for ongoing maintenance of the property. The main issue with grave sharing is that it “challenges long-standing beliefs about the permanence of burials”

(Coutts et al., 2011, p. 260). While grave sharing is not a widely popular practice in North America, it has been used in Europe and Australia (Coutts et al., 2011). This practice has been referred to as “densification downward” (Coutts et al., 2011). In cemeteries where space is limited, or where maximum density standards are imposed, grave sharing may be a method to meeting those standards. Another method for using cemetery space more efficiently includes a plot with one full-body grave shared with cremated remains. Prior to a new cemetery being established, it may be useful to plan ahead for shared grave spaces between family members.

Natural or ‘Green’ Burial

Green burials are designed to provide a final resting place that does not negatively impact the environment. They are also meant to provide burial in the most natural way possible. This method has seen rising interest in recent years as environmental-awareness has increased. There are several practices that are considered ‘green’ burial, including (Basmajian & Coutts, 2010; Bennett & Davis, 2010; Coutts et al., 2011):

- Prohibiting embalming with non-biodegradable or toxic chemicals;
- Burial in an untreated wooden box, rather than using caskets with varnish or lacquer;
- Injecting (cremated) remains into tree root systems;
- Burial in a natural habitat or wildlife corridors with no artificial landscaping or grass mowing;
- Centralized memorialization, or limited grave markers;
- Burial amongst plantings of trees, natural grasses, and wildflowers.

It is essential that green burials are located a safe distance from any drinking water resources, and that burial plots are located far enough from each other to ensure safe decomposition occurs

(Coutts et al., 2011). The intention of natural burials is to support the natural landscape and preserve its natural character. For this reason, green burials are considered to be compatible with the land use objectives of rural localities (Bennett & Davis, 2015). Traditional cemeteries could accommodate multiple burial practices, including green burials, by setting aside a section of the property for green burials.



Figure 4: Natural burial section of Duffin Meadows, Durham Region, Ontario (Source: Natural Burial Association).



Figure 5: Natural burial section of Duffin Meadows, Durham Region, Ontario (Source: Natural Burial Association).

Relevant Policy & Legislation

There are several key pieces of legislation and policy in Ontario that are relevant to cemetery planning. The relevant pieces of policy and legislation at the provincial level are: the *Provincial Policy Statement 2014* (PPS); the *Funeral, Burial and Cremation Services Act, 2002*, the *Growth Plan for the Greater Golden Horseshoe, 2006*; the *Greenbelt Plan, 2005*; and the *Niagara Escarpment Plan, 2005*. These plans do not all specifically address cemeteries; however, their intent, and their significance within the Region, makes them relevant to this analysis. These acts and policies are analysed in this section.

The official plans of similar upper-tier municipalities that have addressed cemeteries are also analysed. The Regional Official Plans of York Region, Durham Region, and Wellington

County all address cemeteries in some manner. There are similar land use challenges in these areas, and they are affected by provincial policy and legislation in similar ways. These policies provide a starting point that Halton Region can build upon and modify in order to achieve its unique goals. This section examines the existing policy, plans and acts that address cemeteries and land use in order to inform recommendations for cemeteries for communities in urbanizing rural areas.

Provincial Policy Statement 2014

The most important piece of policy is the *Provincial Policy Statement, 2014* (PPS), as it regulates all planning legislation, and informs decision making at the provincial, regional and municipal levels. The PPS frames the direction that land use planning and development will take, and creates the basis of how to maintain efficient land use, healthy communities and sustainability.

The 2014 review of the PSS specifies that the major goal of the PPS is to support and regulate planning so that: “Provincial plans and municipal official plans provide a framework for comprehensive, integrated, place-based and long-term planning that supports and integrates the principles of strong communities, a clean and healthy environment and economic growth, for the long term” (PPS, 2014, Part 1). Healthy, liveable, and safe communities are sustained by several pillars, which are identified in Section 1.1.1 including accommodating an appropriate range and mix of residential, employment, institutional, recreation, park and open space and other uses to meet long term needs. Cemeteries are identified as institutional uses in this regard (PPS, 2014, s. 1.1.1.b), indicating that they are components of healthy, liveable, and safe communities. This

does not explicitly indicate where cemeteries should be located, but implies that they are a component of the policy objective.

The PPS also defines cemeteries to be under the designation of cultural heritage landscape. If an area has been impacted by human activity, with a cultural or heritage value, and the feature itself is linked to the geographical area it is located, it should be preserved and is part of what creates and sustains healthy rural communities. This guides planning policy in regards to developing on established cemeteries, but does not provide guidance in regards to the siting of new cemetery locations.

In terms of locating cemeteries, the PPS provides more explicit guidance in section 1.1.5.2. This section explicitly identifies cemeteries as permitted uses in rural lands. Cemeteries are not a permitted use in Prime Agricultural Areas; however, the PPS does provide guidance for permitting uses in these areas in section 2.3.6.1, which states:

Planning authorities may only permit non-agricultural uses in prime agricultural areas for:

- b) Limited non-residential uses, provided that all of the following are demonstrated:
 - 1) the land does not comprise a specialty crop area;
 - 2) the proposed use complies with the minimum distance separation formulae;
 - 3) there is an identified need within the planning horizon provided for in policy 1.1.2 for additional land to be designated to accommodate the proposed use; and
 - 4) alternative locations have been evaluated, and
 - i. there are no reasonable alternative locations which avoid prime agricultural areas; and
 - ii. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.

Funeral, Burial and Cremation Services Act

The *Funeral, Burial and Cremation Services Act, 2002* has authority over the creation and maintenance of cemeteries and their related services, including licensing, administration, ethics, and enforcement. It also applies to the establishment, closing, and special cases and provisions.

The Act is very broad and addresses a variety of issues including the importance of having

services associated with cemeteries, as there are many different traditions including burial, cremation, and embalming. The *Act* specifies that columbarium and mausoleums are part of what constitutes a cemetery. This has the potential to become conflicting if the cemetery owner would like to implement different services on cemetery lands, as is permitted according to the *Act*. There are several different understandings of what a cemetery is, which is important to note in such a multi-cultural area as the Greater Golden Horseshoe. Based on the definitions set out in section 1(1), a cemetery is:

- (a) land that has been established as a cemetery under this Act, a private Act or a predecessor of one of them that related to cemeteries, or
- (b) land that was recognized by the registrar as a cemetery under a predecessor of this Act that related to cemeteries, ^[1]and includes,
- (c) land that, in the prescribed circumstances, has been otherwise set aside for the interment of human remains, and
- (d) a mausoleum or columbarium intended for the interment of human remains (*Funeral, Burial and Cremation Services Act, 2002*).

The *Act* does not speak to the land use planning, the community, the environmental, or the cultural issues of creating a cemetery, but instead focuses closely on the cultural aspects of cemeteries. The *Act* authorizes local municipalities to create policy and legislation around cemeteries (s. 83 (1)).

Growth Plan for the Greater Golden Horseshoe

The *Places to Grow Act, 2005* is a piece of legislation that creates a coordinated understanding of the province's priorities in land use planning by providing methods for different geographic areas of the province to implement regional growth-plans. The *Growth Plan for the Greater Golden Horseshoe, 2006*, is the portion of the Act that is relevant to Halton Region.

The Growth Plan does not specifically address cemetery growth or new cemeteries within the Greater Golden Horseshoe; however, it does specify the necessity for these urban centres to

intensify. The Growth Plan specifies the necessity of population, residential development, economic development and overall intensification and growth over the next twenty years (2006). Halton has been identified as a region that must intensify residential and employment land uses within its built-up area (Growth Plan for the Greater Golden Horseshoe, 2006).

Greenbelt Plan

The *Greenbelt Plan, 2005* identifies where growth and development should be focused, and restricts growth by protecting ‘Countryside lands’. The overall goals of the Greenbelt are to: permanently protect land in order to support agriculture; avoid land fragmentation; preserve natural heritage, water resources, and ecological systems; to protect human and environmental health; and to provide a diverse range of rurally focused economic and social activities. The Greenbelt Plan does not clearly note the importance of planning for cemeteries, but Section 4 of the Plan specifies the policy for non-agricultural uses within the Greenbelt.

Non-agricultural uses are not permitted in either the *Specialty Crop Area* or within *Prime Agricultural Lands*. Proposals for non-agricultural uses must demonstrate that (Greenbelt Plan, 2005, s. 4.1):

- a) the use is appropriate for the location
- b) The type of water and sewer servicing proposed is appropriate
- c) There are no *negative impacts* on *key natural heritage features* and/or *key hydrologic features* or their functions
- d) There are no *negative impacts* on the biodiversity or *connectivity* of the Natural Heritage System.

While new cemeteries within the Greenbelt are not a permitted use, it is likely that some cemeteries can meet the requirements of these criteria. Furthermore, cemeteries can be considered as Cultural Heritage Resources recognized within the Plan. The Plan defines Cultural

Heritage Resources as “man made or natural features that have been identified as *significant* by the local municipality or the province for being meaningful components of a community’s cultural heritage or identity” (s. 4.4.1). In terms of creating new cultural heritage resources, the Greenbelt Plan directs municipalities to build cultural components into plans through the following passage: “Municipal cultural plans should draw from and promote an integrated vision of local cultural development that emphasizes connections across the full range of arts, heritage, cultural industries, libraries, archives and other cultural activity” (s. 4.4.3).

Niagara Escarpment Conservation Plan

The initial Niagara Escarpment Conservation Plan (NECP) did not include cemeteries as being an important aspect of the escarpment or of communities falling within the jurisdiction of the NECP (2005). The Plan only recognized the additional uses of cemeteries, and failed to address the issue of where new cemeteries would be able to be established (NEP, 2005).

The Niagara Escarpment Commission did recently release a discussion paper addressing cemetery planning within the Niagara Escarpment (2014). The Cemetery Discussion Paper was developed as part of a review of the Plan. It is not official policy, but it provides a strong analysis of the vision of the Niagara Escarpment, and it proposes that cemeteries be designated as permitted uses in the following NEP land use designations: Escarpment Rural Area; Minor Urban Centre; Urban Area; and Escarpment Recreation Area. The Discussion Paper then lays out the following development criteria to be used in citing cemetery locations:

- 1) New and existing cemeteries shall meet the requirements of any relevant Development Criteria of this Plan.
- 2) New cemeteries, the expansion of existing cemeteries and cemetery accessory uses shall be located, designed and maintained so as to be compatible with the natural, cultural, visual and open landscape character of the area. This will include, but is not limited to, giving consideration to the following:

- a. Locating the cemetery adjacent to or in close proximity to the regional greenspace network, particularly publicly owned greenspaces, where possible.
 - b. Integrating and maintaining existing site features, such as topography and vegetation, into the design (i.e., minimum regrading, maximum incorporation of natural vegetation, undisturbed and rough areas).
 - c. Improving connectivity and enhancing existing natural heritage and hydrologic features onsite, where feasible.
 - d. Planting native, non-invasive plant species, where feasible.
 - e. Concentrating plantings to maximize canopy and habitat on the site, as well as minimizing large expanses of lawn, where appropriate.
 - f. Encouraging environmentally sustainable cemetery practices (e.g., minimum fertilizer application, limited irrigation demands).
 - g. Designing and locating roadways and trails such that they will not adversely affect adjoining private landowners and will ensure the safety of trail users.
 - h. Providing public access to portions of the property, where appropriate.
- 3) The need for the cemetery or expansion of an existing cemetery has been demonstrated.
 - 4) The size/area and capacity of the cemetery and cemetery accessory uses are demonstrated to be appropriate for the location.
 - 5) Cemetery accessory uses shall be small scale and the maximum size of all accessory uses together shall not exceed a footprint of 465 square metres (5000 square feet) in total.
 - 6) Cemetery accessory uses may be permitted provided they are directly related to the cemetery use and are not considered a high intensity use out of character with the surrounding local area.
 - 7) Cemetery accessory uses shall be designed and located to minimize the impact on the principal use, adjacent land use and the rural open landscape character.
 - 8) Crematoriums, funeral homes, restaurants, banquet halls and conference facilities shall not be permitted as part of the cemetery.
 - 9) The cemetery development shall meet the requirements of any other applicable provincial and municipal policies, plans, regulations or by-laws.
 - 10) The cemetery development shall not extend onto specialty crop areas or prime agricultural areas unless, in the case of prime agricultural areas only, it can be demonstrated that no reasonable alternatives on lower priority agricultural areas exist.
 - 11) Extension of urban services (e.g., sewers, water) shall not be permitted except in Minor Urban Centres, Urban Areas or Escarpment Recreation Areas and if it is deemed appropriate by the municipality.
 - 12) As deemed appropriate by the implementing authority, the following studies are to be submitted for review and approval:
 - a. Environmental Impact Study or a similar study that assesses potential impacts to natural heritage features including but not limited to woodlands, wetlands, watercourses, as well as any mitigation measures to address impacts
 - b. Hydrological and/or hydrogeological study that assesses potential impacts on the quality and quantity of ground and surface water or vulnerable source protection area, as well as any mitigation measures to address impacts
 - c. Traffic analysis that assesses potential impacts to existing surrounding uses, including an assessment of projected onsite parking requirements, as well as any mitigation measures to address impacts

- d. Cemetery Master Plan that provides information relating to the protection and management of natural features onsite and maintenance plan
- e. Site plan which shows location of all buildings and structures, proposed grading and drainage, all accesses and parking areas and outdoor areas planned to be used by the public (e.g., gazebos)
- f. Sediment and erosion control plan that demonstrates how soil will be stabilized and sensitive features will be protected during construction
- g. Any other studies deemed appropriate based on proposal or site conditions (NEC, 2014, p. 18-19).

Official Plans of Similar Regions

Memorial Gardens' appeal of ROPA 38 emphasized that Halton Region currently does not have an adequate policy or plan for cemeteries. Reviewing the policies that have been adopted by other regions and municipalities who face similar development pressures can help guide policy decisions for Halton Region. The municipalities examined here include: York Region, Durham Region and Wellington County.

York Region

York Region's OP notes that any non-agricultural uses of agriculturally zoned land must comply with the Oak Ridges Moraine Conservation Act, the Greenbelt Plan, and local official plans. If there is a need for small-scale chapels and accessory uses within cemeteries and any expansion of existing cemeteries will only be permitted through an OP amendment. If this is done, the plan specifies eight conditions when an amendment would be appropriate. These have been synthesized and summarized into the following:

- 1) The cemetery is appropriate for the area and will serve the Region's population;
- 2) Alternatives to a 'traditional burial' is an option;
- 3) Lands are not available for cemetery uses in the existing Urban Area, Towns and Villages or Hamlets in the Regional market area;

- 4) There will be no need to develop other uses in the same area (churches);
- 5) All environmental (ecological, hydrological) considerations show no adverse impacts;
- 6) No adverse effects on traffic, parking or character of the area;
- 7) There is an enhancement plan that maintains some existing elements, and creates space for alternative interment and improves connectivity between key natural heritage features;
- 8) The use conforms with the policies in Chapter 2 of this Plan i.e. general development conditions?

York Region's ROP addresses York's diversity and prepares for future growth and intensification. This plan provides clear guidelines and limitations for new cemetery developments, while maintaining the Region's different features and considerations.

Durham Region

Durham Region is located east of Toronto and is also part of the Growth Plan for the Greater Golden Horseshoe. Like Halton Region, Durham Region is expecting to accommodate substantial population growth while preserving its rural areas. In Durham's OP, section 5.3.6 addresses the need for cemeteries within communities in order to build healthy, strong, and resilient places where people can live, work, grow, and eventually die. Similar to York Region's Plan, Durham allows the implementation of new cemeteries through an amendment of the OP, on the condition that it still meets the intent of the Plan. Additionally, the cemetery should: not have adverse traffic or parking effects; be proposed on suitable or appropriate development lands; have no adverse environmental impacts; and have provisions for future roads. Durham's OP also specifies that "no new cemetery may be located in Prime Agricultural Land" (Durham Regional

Official Plan, s. 5.3.6) and that any new cemeteries must adhere to the Oak Ridges Moraine Conservation Plan and the Greenbelt Plan.

Wellington County

Within the Wellington County OP, the areas in which cemeteries are noted are: cultural heritage and archaeological resources, prime agricultural areas, and secondary agricultural areas. In terms of culture, Wellington recognizes the importance of maintaining culture throughout the County, and it achieves this through protecting cultural heritage resources as defined in the *Ontario Heritage Act*. In prime agricultural areas, the OP authorizes schools, churches and cemeteries, only in communities that rely on horse drawn vehicles as their sole means of transportation. No other institutions (churches and cemeteries, hospitals, seniors housing, waste management facilities) are permitted in prime agricultural areas. On prime agricultural land, a severance for a church and associated cemetery is permitted when justified by need, and when there are public safety considerations of unique communities that rely on horse and buggy (10.3.6). Special considerations are taken throughout Wellington's OP in order to accommodate and plan with the Amish and Mennonite communities who reside within the county. It is important to note that cemeteries that are permitted on agricultural land or in agricultural areas are only permitted as an associated use for a church for this demographic, who also have limitations in terms of transportation.

Estimating Demand

The permanent conversion of land for use as cemetery space is an important factor to consider in cemetery planning. While cemeteries are compatible with most surrounding land uses, they permanently remove land from the resource base that could otherwise be used for a number of other purposes. For this reason, a cemetery proposal should demonstrate that the community it is intending to service has a demand for cemetery space that is not already being met. Authors Coutts et al. (2011) propose that an area's demand for burial space over a given time period can be estimated through consideration of the following factors: the death rate; the rate of various interment methods; the burial migration rate; the existing interment capacity; and the burial plot density.

Table 1. Variables used to estimate required cemetery acreage (Coutts et al., 2011, p. 258).

Variable	Variable symbol	Variable Note
Land needed or in excess	L	Acres of capacity
Burial need	B	$B = d - c - bm$
Deaths	d	Deaths likely to occur over the projected period. Recommended 30 years
Cremation or other alternative to burial	c	People who contribute to local death rate but who will not require a burial plot
Burial migration	bm	Persons who will be buried or otherwise disposed of elsewhere
Existing capacity	ec	Number of plots available to accommodate those choosing burial
Plots per acre	p	Plots per acre in a typical cemetery

Once the values of these variables are known, they can be inserted into the following equation to produce an estimation of an area's cemetery acreage requirement (Coutts et al., 2011):

$$L = \frac{ec - B}{p}$$

Where $B = d - c - bm$

The following section applies this method of demand estimation to Halton Region for the time period of 2011 to 2036. This time period was used because 2036 is the latest date for which accurate population projection data is available.

Deaths

The number of deaths that will occur from 2011 to 2036 is estimated using crude mortality rate and population data. The crude mortality rate in Halton Region is 559 deaths per 100,000 people per year (Halton Region Health Department, 2014), and the population of Halton Region in 2011 was 518,700 people (Ministry of Finance, 2012). Coutts et al. would multiply 559 by 518.7 (the population divided by 100,000) to get the number of deaths per year, and then multiply that number by the time period of interest (25 years); however, this does not account for population growth. The Ministry of Finance forecasts that Halton Region will experience a 78.8% increase in population from 2011 to 2036 (2012). If this population increase is ignored, then the number of deaths that will occur within the region over the 25 year period will be significantly underestimated. The increase in the annual number of deaths due to an annual increase in population can be calculated using a financial formula that calculates the future value of a growing annuity:

$$F = D \left[\frac{(1 + g)^n - (1 + i)^n}{g - i} \right]$$

Since there is no interest rate (g) on the initial number of deaths, the revised formula that can be used for the relevant purpose is as follows:

$$F = D \left[\frac{1 - (1 + i)^n}{-i} \right]$$

Where F is the total number of deaths over the time period, D is the initial number of deaths at year 1, n is the number of years under analysis, and i is the annual rate of population growth. The initial number of deaths in year 1 is calculated by multiplying the mortality rate of 559 by 518.7 (population/100,000). This produces an initial annual number of deaths of 2901. The annual rate of population growth (i) can then be calculated by taking the projected growth over the 25 year period, which is 78.8%, and then dividing by the number of years in the period, which is 25. This produces a yearly population growth rate of 3.152%. Using these inputs, the equation produces the following result:

$$F = 2901 \left[\frac{1 - (1 + 0.03152)^{25}}{-0.03152} \right]$$

$$F = 107,867$$

The equation estimates that from 2011 to 2036, 107,867 people will die within Halton Region.

Burial and Cremation

Cremation and burial rates must be considered when estimating cemetery demand, because the number of cremations alters the ultimate requirement for cemetery space. Approximately one quarter of those who choose to be cremated expect that they will still be buried in a cemetery (Coutts et al., 2011); however, for the purpose of this analysis it is assumed that cremations will

not require any cemetery space. The method of disposing of cremated remains in a cemetery setting is likely to take up minimal space, and specific information of the space requirements is not available (Coutts et al., 2011).

Data on Cremation rates for Halton Region is not made publicly available. The Bereavement Authority of Ontario is responsible for maintaining records on cremations and burials within the Province, but they denied the request for cremation rate information at a sub-provincial level. In 2011 the provincial cremation rate was 58% (Cain and Young, 2013) and Cemetery Needs Analysis for York Region assumed a cremation rate of 60% (Commissioner of Corporate Services and Chief Planner, 2016). This analysis will also assume a flat cremation rate from 2011 to 2036 of 60%. Of the 107,867 people expected to die within the Region over the time period, 64,720 will be cremated, which leaves 43,147 people requiring burial.

Migration

Not everyone that dies within Halton Region will be buried within Halton Region; furthermore, Halton's cemetery resources may be used by those who die outside of the Region. An estimation of burial migration is therefore necessary to determine the demand for cemetery space. The York Region Cemetery Needs Analysis estimated that the Region would acquire an additional 33% of cemetery use from those living and dying outside of the Region (namely Toronto). Peel Region provides a buffer between Halton and Toronto, but a 33% influx is used in this assessment in order to overestimate rather than underestimate cemetery demand. An additional 33% of burials over the 25 year period in Halton Region is equal to 14,239.

Plot Density

The space required for interment purposes depends heavily on the density of burial. Minimum plot sizes, mausolea, spacing between graves, and infrastructure features such as roads and trees all influence the burial density of a cemetery (Coutts et al., 2011). Calculating the current plot density of all of Halton Region's cemeteries is beyond the scope of this analysis; however, Coutts et al. (2011) provide a method for approximately plot density that can be applied here. A traditional cemetery density is estimated to be 680 plots per acre, while mausolea densities are closer to 2500 plots per acre (Coutts et al., 2011). Traditional burial is the preferred method of interment, and the weighted average density when considering the rates of both interment methods is 1200 plots per acre (Coutts et al., 2011).

Calculating Cemetery Land Requirement

The total cemetery acreage required from 2011 to 2036 irrespective of current cemetery capacity can be calculated as follows using the values that have been determined thus far:

$$L = \frac{d - c - bm}{p}$$

Where d is total deaths within the region, c is the number of cremations, and bm is burial migration from the community.

$$L = \frac{107,867 - 64,720 - (-14,239)}{1200}$$

$$L = 47.8 \text{ acres}$$

A total of 47.8 acres of cemetery space is required to meet the demand of the Region from 2011 to 2036.

Current Land Base

Halton Region requires 47.8 acres of cemetery space to meet demand for the period 2011 to 2036; however, this does not mean that the creation of 47.8 acres of new cemetery space needs to occur because free internment space already exists. Calculating the acreage of existing internment capacity is difficult due to: the large number of cemeteries that need to be inventoried (47); the lack of contact information for most of these cemeteries; non-response by cemeteries that could be contacted; and lack of knowledge of those that responded. What is presented here is what was able to be determined through: analysis of cemetery parcels in a GIS; analysis of cemetery parcels through Google Maps air photos; review of cemetery proposals to Halton Region; and discussion with cemetery managers. Only cemeteries with significant open capacity that could be determined with reasonable confidence are observed. Furthermore, undeveloped portions of cemetery parcels were considered as part of the available space.

Table 2. Known available capacity of large cemeteries in Halton Region.

Name	Owner	Location	Size (acres)	Available space (acres)
Gate of Heaven	Roman Catholic Episcopal	Burlington	109	Approximately 50
Holy Redeemer	Roman Catholic Episcopal	Georgetown	41	Slightly less than 41
None	Roman Catholic Episcopal	2585 Lower Base Line, Milton	90	55
None	Roman Catholic Episcopal	12932 Dublin Line, Acton	9	9
Glen Oaks	Arbor Memorial	Oakville	128	At least 42
Burlington Memorial Gardens	Arbor Memorial	Burlington	101	Approximately 50
None	Milton Cemetery Company	2585 lower baseline, Milton	30	21

There are approximately 155 acres of open cemetery space dedicated to Roman Catholics, and 113 acres of open cemetery space that will service the needs of everyone else. Both of these numbers far exceed the Region's total estimated demand of 47.8 acres from 2011 to 2036.

Demand Estimation for Cemetery Applications

Since cemeteries essentially impose a permanent land use on the land base, it is good planning to require that new cemetery proposals perform a demand estimation. The Coutts et al. (2011) method of demand estimation that has been provided can be used as a base model of what this estimation process should consider. The analysis that has been performed for Halton Region indicates that enough cemetery capacity currently exists within the Region to sufficiently service demand until 2036; however, the analysis makes several assumptions based on available information, and therefore should not be taken as a justification to prevent all cemetery development at this point in time. This analysis was performed at the regional level only, and with limited information. Professional cemetery developers may have information that would increase the accuracy or relevance of their analysis at a more localized scale.

Permitted Use Recommendations

This section provides recommendations in regards to designating cemeteries as permitted uses within Halton Region's seven mutually exclusive land use designations. The recommendations stem from the consideration of the many relevant factors that have been discussed in this report. These factors include: the necessity of cemeteries; the relevant legislation that has been reviewed; the policies of similar regions; the potential of what cemeteries can be used as; and the goals and objectives of the various land use designations within Halton Region. Broad permitting

criteria are also provided for areas where it is recommended that cemeteries be established as a permitted use. These criteria should be considered as the minimum standards to be considered when permitting and locating new cemeteries.

Regional Natural Heritage System

The objectives of the Region's Natural Heritage System revolve around protecting the environmental and rural quality of the landscape. Much of the Region's Natural Heritage System consists of lands within the Niagara Escarpment. The Niagara Escarpment Commission Cemetery Discussion Paper (2014) proposes that cemeteries be designated as permitted uses in the following NEP land use designations: Escarpment Rural Area; Minor Urban Centre; Urban Area; and Escarpment Recreation Area. It is recommended that in Natural Heritage System Areas, Halton Region apply the same criteria identified in the NEC Cemetery Discussion Paper that were provided earlier in this report (p. 25).

There are also significant Greenbelt areas within the Natural Heritage System. The Greenbelt Act does not allow non-agricultural uses in prime agricultural land. Greenbelt lands within the Natural Heritage System will have to conform to the Greenbelt Plan, which requires that proposals for non-agricultural uses demonstrate (Greenbelt Plan, 2005 s. 4.1):

- a) the use is appropriate for the location
- b) The type of water and sewer servicing proposed is appropriate
- c) There are no *negative impacts* on *key natural heritage features* and/or *key hydrologic features* or their functions
- d) There are no *negative impacts* on the biodiversity or *connectivity* of the Natural Heritage System.

While it is still recommended that cemeteries be designated as permitted uses in Natural Heritage Areas, they will still need to conform the Greenbelt and Niagara Escarpment Plans when necessary.

North Aldershot Policy Area

The North Aldershot Policy Area is a predominately rural island surrounded by urban infrastructure. Cemeteries are not out of character with the intended goal of the policy area; for example, the Gate of Heaven Cemetery is located within the area, which opened quite recently in 1981. It is recommended that cemeteries be designated as a permitted use in this area. Since the North Aldershot Policy Area fragments the surrounding Natural Heritage System, it is recommended that cemeteries in this area be subject to the same criteria that are proposed for the Natural Heritage System.

Agricultural Area

The PPS (2014) allows cemeteries as permitted uses in rural lands that are not prime-agricultural land. Wellington County allows cemeteries in rural lands, while York and Durham Region's only allow them through a ROPA. Halton's agricultural area includes both prime and non-prime rural agricultural lands. Cemeteries have been established as land uses that are compatible with surrounding rural and agricultural land uses. It is recommended that cemeteries be established as permitted uses in rural lands that are not prime agricultural lands if they meet the following criterion:

- 1) There is a local or regional demand for cemetery space that is not being met, or will not be met in the near future by existing cemeteries within a reasonable distance of the service area.

The PPS does not designate cemeteries as permitted uses in prime agricultural lands; however, in regards to non-agricultural uses in prime agricultural areas, section 2.3.6.1 of the PPS (2014) states:

Planning authorities may only permit non-agricultural uses in prime agricultural areas for:

- c) Limited non-residential uses, provided that all of the following are demonstrated:
 - 5) the land does not comprise a specialty crop area;
 - 6) the proposed use complies with the minimum distance separation formulae;
 - 7) there is an identified need within the planning horizon provided for in policy 1.1.2 for additional land to be designated to accommodate the proposed use; and
 - 8) alternative locations have been evaluated, and
 - iii. there are no reasonable alternative locations which avoid prime agricultural areas; and
 - iv. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.

Cemeteries should not be designated as a permitted use in prime agricultural areas. They must instead undergo a ROPA and address the necessary criteria established in the PPS.

Hamlets

According to Halton Region's Official Plan, the objectives of hamlets and rural clusters are: (1) to provide limited opportunities for rural, non-farm residences in identifiable communities; and (2) to accommodate rural, non-farm uses (ROP, 2009, s. 102). Cemeteries can be considered a rural, non-farm use. It is recommended that cemeteries be established as a permitted use in Hamlets, and be subject to the following criterion:

- 1) There is a local or regional demand for cemetery space that is not being met, or will not be met in the near future by existing cemeteries within a reasonable distance of the service area.

Urban Area

The relevant legislation does not explicitly address cemeteries in urban areas. Other regions, such as Durham and York Region's, do not allow cemeteries in urban areas. This restriction ignores the fact that over time cemeteries located on the urban periphery may become a

component of the urban environment anyway, and that cemeteries can serve multiple purposes that are beneficial to urban environments. Cemeteries are not explicitly incompatible or compatible with the urban objectives set forth in Halton Region's Official Plan. They do not contribute towards achieving urban residential or employment densities; however, they are important components of *complete communities*, and they can function as a multi-use landscape if they are planned to serve a purpose as both a place of internment and a public park. It is recommended that cemeteries be permitted uses in urban areas if they meet the following criteria:

- 1) There is a local or regional demand for cemetery space that is not being met, or will not be met in the near future by existing cemeteries within a reasonable distance of the service area.
- 2) The cemetery will not prevent the Region from achieving intensification targets.
- 3) There are no reasonable alternatives outside of the urban area, and either;
 - a. Sufficient evidence has been provided indicating that the community is “incomplete” due to the absence of a cemetery, or;
 - b. There is a demand for park space that the cemetery can service as a multi-use space.

Mineral Resource Extraction Areas

Cemeteries are not compatible uses in mineral resource extraction areas. These areas are designated to ensure Regional access to mineral aggregate resources, and the establishment of new cemeteries in these areas would permanently prevent access to these important resources. It is recommended that cemeteries continue to remain as a non-permitted use in these areas.

Regional Waterfront Park

The Regional Waterfront Park area constitutes a very specific and small portion of Halton Region. These park areas are well established, and cemeteries should not be permitted as a new use in these areas.

Conclusion

Memorial Gardens' appeal of ROPA 38 emphasized that Halton Region does not provide guidance for cemetery planning. Cemeteries are a necessary land use within complete communities; therefore it is crucial that relevant policies are established to guide their development. It has been demonstrated that cemeteries can be designed as multi-use landscapes that are compatible with both rural and urban areas. While cemeteries are a necessary and compatible land use, their permanency on the landscape should require that the creation of new cemetery space be justified by demand. The recommendations provided in this report consider all of these factors while conforming to relevant provincial policy and legislation. This report provides a policy foundation from which Halton Region should build upon.

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