




	Report for Resident Services
	Report for Peter Gadsdon - Corporate Director Partnerships Housing & Resident Services
	Cllr Harbi Farah - Lead Cabinet Safer Communities, Jobs & Skills
Public Space Protection Order (PSPO) – Paddington Old Cemetery Review	

Wards Affected:	Queens Park
Key or Non-Key Decision:	Non-Key
List of Appendices:	<p> Appendix 1 - Cemetery Complaints</p> <p> Appendix 2 - Staff Risk Assessments</p> <p> Appendix 3 - Equalities Impact Assessment v1</p> <p> Appendix 4 - Vulnerable Persons Statement</p> <p> Appendix 5 - Department for Environment Food & Rural Affairs - Practitioners Guide</p>
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1. Introduction to Public Space Protection Orders (PSPOs)

- 1.1. The [Anti-Social Behaviour Crime and Policing Act 2014](#) permits local authorities to implement a Public Space Protection Order (PSPO) to deal with a particular nuisance or problem in a specific area within the authority's area that is, or is likely to have a detrimental effect on the quality of life of those in the locality. This initiative assists in combating anti-social behaviour (ASB) for a maximum of 3 years and has been adopted by many local authorities in the UK.
- 1.2. The levels of anti-social behaviour and the nuisance complaints pursuant to a PSPO are assessed to establish whether they have a detrimental effect on the quality of life of those in the community. At any point before the expiry of a PSPO, the council can extend and or vary the PSPO if it is considered necessary to prevent the original behaviour from occurring or recurring. Following an increase in complaints of dog behaviour in Paddington Old Cemetery (POC), this report seeks approval to vary the PSPO prohibitions in relation to POC following the public consultation. The options are to add, remove or modify the existing prohibitions.
- 1.3. The legal requirements regarding the council's powers to extend, make, vary, or discharge a PSPO are set out in **section 12**. They must be considered, together with the council's local threshold criteria for making PSPO's in Brent, when the decision maker considers each prohibition of the proposed PSPO.
- 1.4. The Council knows that the majority of those who live in, work in and visit POC keep the area clean and safe; however, it wants to ensure where this is not the case, it uses the relevant legislation and approaches to maintain a clean and safe environment.

2. Alternative Options Considered

- 2.1. The Department for Environment, Food and Rural Affairs provides a practitioner's guide which deals with irresponsible dog ownership. This includes, education and engagement, early intervention using non-statutory measures, Acceptable Behaviour Contracts (ABCs), Community Protection Notices (CPNs), Injunctions, Criminal Behaviour Orders (CBOs), Public Spaces Protection Orders (PSPOs) and partnership working. Please see **Appendix 5** for the full guide.
- 2.2. Brent Council recognises the need to balance the various users of the cemetery. It is believed that removing the prohibitions that apply to POC altogether would not address the increased number of dog complaints received and would provide Brent with limited powers to tackle the complaints that amount to issues of Anti-Social Behaviour (ASB). However, together with the consideration of other tools, it is thought a balanced approach can be sought.
- 2.3. Where other issues that were not originally brought to the Council's attention, have arisen during the consultation, further options to resolve these have also been included, which can be found in section 15.

3. Recommendations for the Corporate Director and Cabinet Member

- 3.1. It is recommended that the relevant Corporate Director and Cabinet Member for Public Safety & Partnerships:
- 3.1.1.1. considers and notes this report and the 'Consultation Analysis Report' together with the evidence supporting the amendment or variation of the PSPO in Appendix 1 to Appendix 5.
 - 3.1.1.2. agree to vary the prohibition regarding POC set out in the PSPO dated February 2023 in accordance with the draft terms agreed in consultation with the Cabinet Member for Public Safety & Partnerships on 30 January 2025.

4. PSPOs in Brent

- 4.1. Controlled Drinking Zones were introduced in Brent circa 2006 with the initial pilot taking place in Kilburn. In 2017, the first PSPO was applied for and superseded Controlled Drinking Zones (CDZs) and introduced a single street drinking prohibition. This PSPO was renewed twice and was due to expire on 19 October 2023.
- 4.2. The first Parks, Open Spaces, Cemeteries and Graveyards (POsCGs) PSPO was applied for in 2019 and was due to expire on 16 September 2022. The first Wembley Park (the area surrounding Wembley National Stadium) PSPO was also applied for in 2019 and was due to expire on 31 December 2022.
- 4.3. To prevent confusion and to ensure uniformity, one single PSPO was applied for in 2022 which consists of a Borough wide PSPO with specific conditions in Town Centres, POsCGs and Wembley Park. This PSPO commenced on 1 February 2023 and will be in place until 31 January 2026.
- 4.4. A further PSPO addressing nuisance vehicles was introduced on 20 April 2023 and will expire on 19 April 2025.

5. Paddington Old Cemetery – Introduction

- 5.1. Paddington Old Cemetery is one of four cemeteries owned by Brent Council. It is located on Willesden Lane, NW6 7SD and sits within the Kilburn Connects area in the Queens Park ward. The only entrance to the cemetery can be found on Willesden Lane.



Paddington Old Cemetery Map

- 5.1.1. POC is split into different numbered sections for the purposes of locating graves, as shown in the image below.

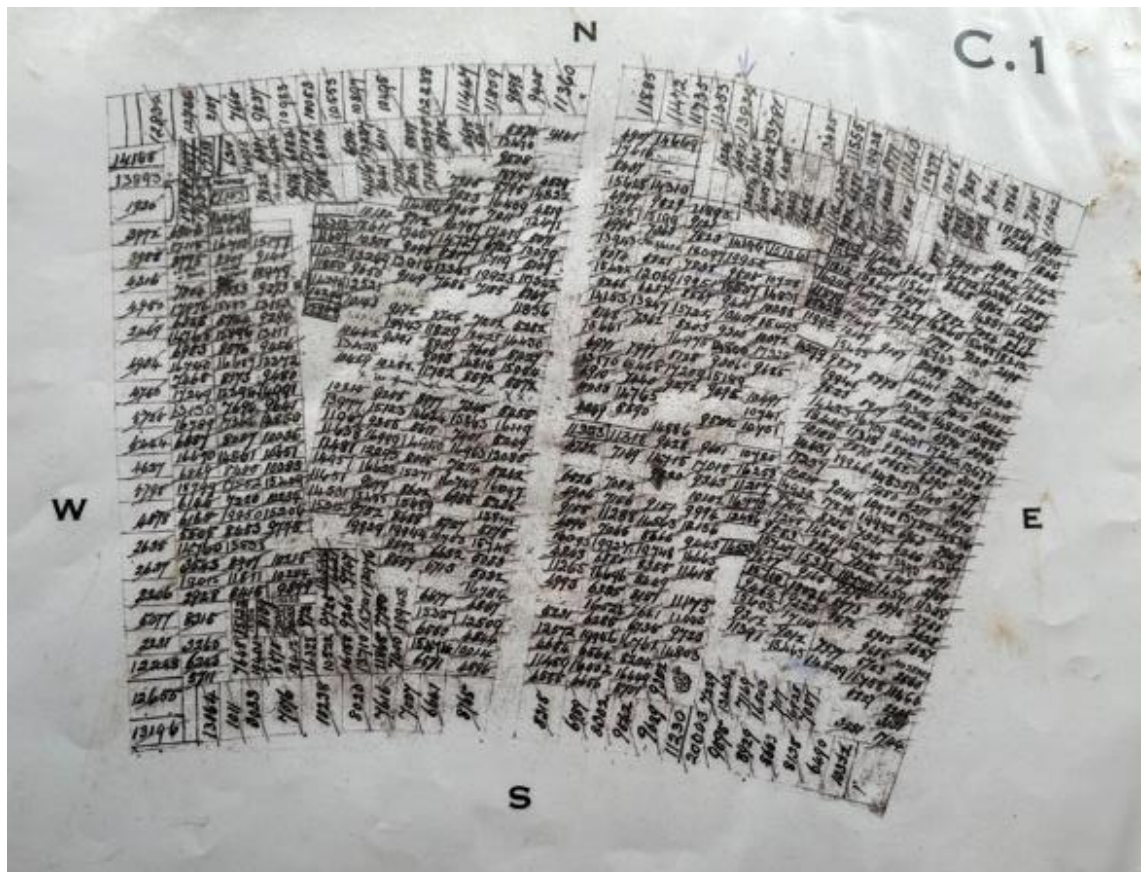


Paddington Old Cemetery by Section



Paddington Old Cemetery Section 1C

5.1.2. The above 'Paddington Old Cemetery Section 1C' plan shows an example of a close up of section 1C in 'Paddington Old Cemetery by Section'. Several headstones can be seen spread throughout the grassed area. The image below shows the number of existing grave plots that exist in the same section. There are over 1,600 interments in section 1C alone.



Existing Graves in Section 1C

5.2 Opening Times

Month	Times
January and February	9am-4pm
March	9am-6pm
April	9am-7pm
May to August	9am-8pm
September	9am-7pm
October	9am-5pm
November and December	9am-4pm

POC Opening Times

- 5.2.1 Above is a table which shows the various opening times for POC. Although the official cemetery opening time is 9am, since 2020, the Cemeteries team have opened the small pedestrian gate each day Monday to Friday at 8am to accommodate dog walking.
- 5.2.2 The other cemeteries in Brent are Willesden New Cemetery, Alperton and Carpenders Park. All three cemeteries are subject to the PSPO including the following dog related prohibitions; dogs must be on-lead, the picking up and disposal of dog fouling and no more than 4 dogs per person.

5.3 Paddington Old Cemetery Facilities

- 5.3.1 The cemetery currently provides free car parking for all visitors, seating, a toilet, running water and twenty-two litter bins.

6. Paddington Old Cemetery – History

- 6.1. In 1855 Paddington Burial Board purchased 24 acres of rural land in Willesden. Cemetery designer Thomas Little created a horse-shoe tree-lined path layout. On each side of the entrance, he built lodges and, in the centre, two Gothic-style chapels which are Grade II listed. Its original formation was in a rural landscape which later became a green open space. There is a war memorial by the western entrance. There are 218 graves for casualties of World War I and World War II. The Goetze Memorial (c. 1911), erected by artist Sigismund Goetze in memory of his parents, is Grade II listed.
- 6.2. By 1923 the cemetery was rapidly becoming full, and the Metropolitan Borough of Paddington decided to acquire new land for a cemetery further out of London. This was opened as 'Paddington New Cemetery' (now known as Mill Hill Cemetery) in 1936, leading to the site on Willesden Lane becoming known by its current name of 'Paddington Old Cemetery'.
- 6.3. The City of Westminster sold the cemetery to Brent Council in 1985. In 1999, Paddington Cemetery received a Special Commendation in the 'Cemetery of the Year Awards', the cemetery office being praised for their work in reinstating the cemetery from closed status to local use. To celebrate the Millennium, in 2000 new trees were planted together with an apiary within the cemetery that produced 'Tombstone honey'. The cemetery is Grade II listed.
- 6.4. In 2017, the completion of the burial mound was subject to an asbestos scare. The results indicated an amount so small that rectification work was completed and the usage of the mound for burials was continued. Since 2019, on average 245 burials have taken place in POC.

7. The Future of Paddington Old Cemetery

- 7.1 A recent consultation was undertaken to review the future of the chapels which included restoration and potential additional facilities. This was undertaken in partnership with Friends of Paddington Old Cemetery group. The Chapels Project at Paddington Old Cemetery is an ongoing initiative to preserve and repurpose the historic chapel buildings. Phase 1 of the project focused on conducting an options appraisal, engaging with the local community and stakeholders through a series of events and discussions. These sessions explored potential future uses of the chapel

space, ensuring the plans align with the needs and interests of the community and Council.

- 7.2 In parallel, emergency grants are being sought to secure and stabilise the chapel buildings while long-term plans are developed. This essential work will protect the structures, preventing further deterioration and enabling the next stages of the project to move forward. The Chapels Project demonstrates a commitment to preserving heritage while creating a valuable and functional space for the local community.
- 7.3 The Law Commission is currently undertaking a wide-ranging consultation and review into funerary methods, including a review of legislation relating to burial and cremation. Brent has historically had a higher usage of Burials vs Cremations, as the funerary method of choice and whilst burial remains a popular, and sometimes the only, funerary choice available, the chronic shortage of burial space, especially in urban areas is a long-standing issue. To ensure the continued provision of grave space, it is likely that the future of POC will include the further reclaiming of graves, allowing for the site to continue offering burials over the coming years. The objective is addressing the critical shortage of burial space in Brent by reclaiming graves to ensure the continued provision of burial services for local residents. The council uses grave records to identify reclaimable spaces while ensuring compliance with Greater London (General Powers) Act 1976. Reclaimed graves allow for new interments in otherwise fully utilised areas, preserving burial options for the community. This process aligns with practices in other boroughs like Croydon and Sutton, where grave reclamation is a primary method for addressing space shortages. The benefit of reclamation is that it ensures the availability of burial spaces for years to come, enabling local residents to bury their loved ones within the borough. It prevents residents from having to seek costly burial options outside Brent and crucially supports the maintenance of local cemeteries. The initiative is part of a sustainable solution that balances the needs of the community with efficient space utilisation.

8. Local Parks

- 8.1. The table below shows the closest open spaces to POC, their proximity and on/off lead permissions.

Park Name	Address	London Borough	Dog Permissions	Distance from POC
Queens Park	NW6 6SG	The City of London Corporation	Dogs not permitted off leash	16 min walk (4 min drive)
Tiverton	NW10 3HL	Brent Council	Dogs permitted off leash	15 min walk (4 min drive)
Kilburn Grange Park	NW6 2JL	Camden Council	Dogs not permitted off leash	14 min walk (4 min drive)
Paddington Recreation Ground	W9 1PF	Westminster Council	Dogs permitted off-leash. Two additional enclosed dog walking areas	30 min walk (7 min drive)
Roundwood Park	NW10 3SH	Brent Council	Dogs permitted off leash	44 min walk (8 min drive)

Local parks in proximity to POC

9. Paddington Cemetery Complaints

- 9.1. Prior to the commencement of the consultation, 2024 saw 74 complaints relating to dogs from 23 named complainants and 4 who chose to remain anonymous. 14 of the total complaints were made by cemetery staff members.

- 9.2. Since 18 November 2024 when the consultation began, there have been a further 6 complaints of the same nature, received by 4 complainants. In total there have been 80 complaints received in 2024 by 27 complainants.
- 9.3. This review aims to look at the nature of the complaints received by the Cemeteries team by members of the public and staff and how they may have detrimentally affected visitors. Complaints also include those made by members of staff who frequent the cemetery daily. To ensure staff and users safety, this led to changes in staff risk assessments as per **Appendix 2**. This is due to evidence of dog behaviour that staff have confirmed delays or hinders them from safely undertaking their duties. There are a number of videos that will be provided to the Corporate Director for review which contain such activities where staff hindered/delayed from carrying out their work.
- 9.4. The types of complaints received have been categorised below.

Key Complaint Types
Dog out of control
Dog urinating on graves
Dog removing items from graves
Dog on dog attack
Dog fouling on grave
Dog running up to grave owners
Dog running over graves
Dogs running over war graves
Dog on human attack
Too many dogs
Too many professional dog walkers
Paw prints on memorial
Dog walkers – exceeding 4 dogs
Aggressive and abusive dog owner
Aggressive dog - jumping up
Ball throwing
Dogs on the mound
Afraid to visit cemetery
Lack of respect for graves
Dog locked in cemetery
Stepped in defecation

Key Types of Complaints

Please see **Appendix 1** for the full list of complaints

10. The Consultation

- 10.1. The consultation was published on Brent Council's 'Have Your Say' portal on 18 October 2024 and closed on Tuesday 10 December 2024 for a duration of 7.7 weeks. A breakdown of the consultation analysis can be found in the Consultation Analysis Report and should be read in conjunction with this report.

11. Financial Considerations

- 11.1. The approximate cost of affixing or modifying additional notices to the entrance of POC is £1,000 and will be funded from existing budgets within Partnerships Housing and Resident Services.
- 11.2. As part of existing duties undertaken by the Neighbourhood Patrol team and MET Police, enforcement will be undertaken and funded from existing budgets within the Public Realm Service. The cost of enforcement is £30p/h.
- 11.3. Should there be no changes made, there is no cost in relation to the current signage.
- 11.4. Any further changes would need to be sent to Finance for consideration before any further changes are made.

12. Legal Considerations

- 12.1. The Anti-Social Behaviour, Crime, Crime and Policing Act 2014 (“the 2014 Act”) provides the Council with power to make PSPOs in the areas where a particular nuisance or problem exists which is detrimental to local communities’ quality of life, by imposing conditions on the use of those areas. PSPOs can also be used to deal with likely future problems (section 59).
- 12.2. In order to issue a PSPO, the Council must be satisfied on reasonable grounds that the two statutory conditions are met. The first condition (section 59(2) of the 2014 Act) is that-
 - a) the activities carried on in a public place within the authority’s area have had a detrimental effect on the quality of life of those in the locality, or
 - b) it is likely that the activities will be carried on in a public place within that area and that they will have such an effect, andthe second condition (section 59(3) of the 2014 Act) is that the effect, or likely effect, of the activities-
 - a) is, or is likely to be, of a persistent or continuing nature,
 - b) is, or is likely to be, such as to make the activities unreasonable, and
 - c) justifies the restrictions imposed by the notice.
- 12.3. A PSPO must identify the public place in question and can (a) prohibit specified things being done in the restricted area, (b) specified things to be done by persons carrying on specified activities in that area, or (c) does both of those things.
- 12.4. The reasonableness requirement is set out in section 59(5) of the 2014 Act which provides that the only prohibitions, or requirements that may be imposed are ones that are reasonable to impose in order-
 - (a) prevent the detrimental effect referred to from continuing, occurring or reoccurring, or
 - (b) to reduce that detrimental effect or to reduce the risk of its continuance, occurrence or recurrence.

Section 59(6) provides that a prohibition or requirement may be framed-

- (a) so as to apply to all persons, or only persons in specified categories, or to all persons except those in specified categories;
- (b) so as to apply at all times, or only at specified times, or at all times except those specified;
- (c) so as to apply in all circumstances, or only in specified circumstances, or in all circumstances except those specified.

12.5. Further, the Council may vary an existing PSPO (a) by increasing or reducing the restricted area; and /or (b) by altering or removing a prohibition or requirement included in the order, or adding a new one, providing it complies with the reasonableness requirement.

12.6. The Home Office Anti-Social Behaviour, Crime and Policing Act 2014: Anti-social behaviour powers statutory guidance for frontline professionals (The Home Office Guidance) states “these orders can restrict what people can do and how they behave in public spaces, it is important that the restrictions imposed are focussed on specific behaviours and are proportionate to the detrimental effect that the behaviour is causing or can cause, and are necessary to prevent it from continuing, occurring or recurring”.

12.7. Further, with respect to the controlling the presence of dogs the Home Office Guidance states the following:

- a) “Under the Animal Welfare Act 2006, owners of dogs are required to provide for the welfare needs of their animals. This includes providing the necessary amount of exercise each day, which in many cases will require dogs to be let off the lead whilst still under control”.
- b) “When deciding whether to make requirements or restrictions on dogs and their owners, local councils will need to consider whether there are suitable alternative public areas where dogs can be exercised without restrictions. Councils should consider if the proposed restrictions will displace dog walkers onto other sensitive land, such as farmland or nature conversation areas”.
- c) “Guidance published by the Department for Environment, Food and Rural Affairs on dog control states that councils must consult dog law and welfare experts e.g. vets or animal welfare officers and organisations affected by restrictions before seeking to impose restrictions”.
- d) “Consideration must also be given on how any dog walking restrictions being proposed would affect those who rely on assistance dogs, ensuring any prohibition or requirement is compliant with the provisions of Equality Act 2010 or considering what exemptions should apply for assistance dogs”.

12.8. Appendix 2 of the April 2015 Cabinet report, in relation to the implementation of the 2014 Act, sets out a local protocol within Brent for making a PSPO. The local protocol includes a local threshold criteria in addition to the requirements for making a PSPO to those set out in section 59 of the 2014 Act and the additional local threshold criteria are as follows:

“(a) the nuisance behaviour described has taken place on at least five occasions over a one-year period, or

(c) evidence has been gathered over a three-month period”.

12.9. Before deciding to vary the PSPOs, the Council must comply with certain statutory requirements relating to publication, consultation, notification and information regarding the proposed PSPOs variation. In addition, the Council will need to evidence that it has given regard to statutory guidance issued by the Secretary of State.

12.10. The following consideration points are brought to the attention of the Corporate Director, Partnerships, Housing and Resident Services:

a) the term “detrimental effect” is not defined by statute. The term has been considered by case law and the current position is “local authorities [have been] given a wide discretion to decide what behaviours are troublesome and require to be addressed within their local area. This requires local knowledge, taking into account conditions on the ground, exercising judgement (1) about what activities need to be covered by a PSPO and (ii) what prohibitions or restrictions are appropriate for inclusion in the order. There may be strong feelings locally about whether any particular activity does or does not have a detrimental effect, in such cases a local authority will need to weigh up competing intereststhe behaviours which PSPOs are intended to target are those which are seriously anti-social, not ones that are simply annoying”.

b) the Corporate Director, Partnerships, Housing and Resident Services is reminded to “look at each proposal under the PSPO and not focus on just the matters raised in writing”.

c) The Local Government Association paper entitled “Public Spaces Protection Order, Guidance for Councils” (pg. 15), although non statutory guidance, states “Councillors have an important role in examining the processes used in drafting the proposal. This will include analysing the outcomes of the consultation process and other supporting evidence offered to satisfy the statutory criteria, and determining whether, on balance this provides sufficient grounds to proceed”. The Local Government Association (“LGA”) does not provide statutory guidance and local authorities are not legally obliged to follow advice from the LGA. However, the LGA provides useful advice to local authorities on areas of best practice in relation to the exercise of various local authority functions.

d) When considering the Human Rights Act the council must balance the rights and freedoms of individuals, in relation to the proposed restrictions imposed, against the needs of the wider community. In particular, s72 of the Anti-Social Behaviour, Crime and Policing Act 2014 requires the Council to have “particular” regard to Articles 10 (the right to freedom of expression) and 11 (the right to freedom of assembly and association). As a public authority within the meaning of section 6 of the Human Rights Act 1998 it is unlawful for the Council to act in a way which is incompatible with the European Convention for the Protection of Human Rights Convention right. Each of these rights are “qualified rights” which means that they can be interfered with if the interference is justified. The potential justifications here include public safety, the prevention of crime and disorder and the protection of health.

- e) PSPOs, or their variation, may be challenged within six weeks of being made by way of an application to the High Court. The Court may suspend the operation of the PSPO or any of the prohibitions imposed by it until the determination of the proceedings. Should the Court be satisfied the Council erred and the applicant has been substantially prejudiced by that failure, it may quash the Order or any of the prohibitions imposed by it.
- f) Breach of a PSPO is a criminal offence, subject to a fixed penalty notice (of up to £100) or prosecution and a fine of up to £1,000 (Level 3 of the Standard Scale). Once approved, the PSPO variation must be published on the Council website. Notices must be put up where practical, on or adjacent to the public places to which the PSPO variation relates, publicising the fact that the PSPO has been made and its effect.
- g) The decision notice for the Cabinet meeting of 22 December 2022 regarding the delegation of functions in the exercise of powers under the 2014 Act, which covers PSPOs, confirms: “Delegated authority to the Corporate Director Resident Services in consultation with the Cabinet Member for Safer Communities & Public Protection for the function of making all Public Spaces Protection Order under the Anti-Social Behaviour Crime and Policing Act 2014 Act”.
- h) The post Corporate Director Resident Services and Cabinet Member for Safer Communities & Public Protection has since been deleted and the relevant functions transferred to the Corporate Director Partnerships, Housing and Resident Services and Cabinet Member for Public Safety & Partnerships. Consequently, the delegation is also “inherited” by the said Corporate Director and Cabinet Lead Member.
- i) Should changes to the PSPO be granted, training for all authorised council and police officers will be provided. This is not only to ensure that all officers understand what prohibitions can be enforced but also to ensure that the council’s expectations around proportionality are applied when making a decision as to whether a Fixed Penalty Notice (FPN) should be issued. This is to ensure a fair and consistent approach across the borough.

13. Equity, Diversity and Inclusion Considerations

- 13.1. The PSPO Guidance asserts the importance of identifying the potential impact of a PSPO on their community and requires that they comply with the requirements under the Equality Act 2010. Under the Act, Councils are required to have due regard for how the implementation of a PSPO might target or impact on certain groups.
- 13.2. The Council has undertaken an Equalities Impact Assessment (EIA) on whether the a variation of the prohibitions at POC will have a distinct impact on groups with protected characteristics. By doing this, the Council has the opportunity to consider how they may mitigate against any impact. The Equality duty includes age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation and Marriage and civil partnership.
- 13.3. Please see **Appendix 3** for the Equalities Impact Assessment as of 24 January 2025.

- 13.4. It is noted in the EIA that targeting vulnerable persons including those with mental health issues is not an appropriate or effective way of dealing with issues. Where enforcement is required, it is important that this be carried out in a way that supports an effective long-term solution for those vulnerable persons. **(Appendix 4).**

14. Summary of Responses

Introduction

- 14.1. The Council are extremely grateful to all who took the time to complete the consultation. It is clear from the consultation outcome, this topic is very emotive and all parties are extremely passionate in their views related to the subject. Indeed, the consultation received the most responses in the history of consultations carried out by Brent Council, the responses for which have proven to be very informative.
- 14.2. The cemetery is only listed by Historic England as a Park or Garden because of the nature of their categorisation. Brent Council considers all graves in the cemetery to be important regardless of age or state and will continue to protect those that have been laid to rest in POC in a manner that is expected by members of the public.
- 14.3. Two petitions were initiated by those who would like their dogs to remain off-lead and those that would prefer a complete ban. Both petitions attracted a number of supporters with 687 and 1092 person signing the petitions respectively.
- 14.4. It is important to point out that the purpose of the consultation was to consider effective prohibitions to manage the increasing number of dogs complaints relating to dog behaviour in POC. The number of people for or against each of the issues that have arisen throughout the consultation, may have given an indication of *how many people* share the same opinion but these numbers cannot be favoured over activities that are persistently or unreasonably having a detrimental effect on others. The complaints received by the Cemeteries team had to be further investigated, particularly where the numbers have escalated over the last few years.
- 14.5. Local authorities must balance the needs of residents, businesses, and visitors to Brent. What may appear as only a few complaints, may still have a 'detrimental effect' on members of the public in an area.
- 14.6. As the Council was already aware of the issues, the questions were posed in such a way to capture the thoughts and feelings surrounding those issues to verify the extent of their effect. Indeed, the PSPO Guidance states that collating information and impact of the ASB subject to the PSPO are core elements of the evidence.
- 14.7. In order to balance this, the preamble to the consultation was kept to a minimum in relation to the nature of the complaints relating to dog behaviour. Any person experiencing activities they consider as having a detrimental effect, would be given the opportunity to describe this in question 26 without the need to be prompted.
- 14.8. On consideration of the responses, it appears two parallel worlds exist, and the disparity is vast. At either end of the spectrum there are two extremes, those that believe a cemetery is sacred, a place for visiting loved ones graves which provides a space for self- reflection and grieving and on the other hand, those that value the space as somewhere they can provide the best exercise for their dogs off-lead and whilst doing so, enjoy a community space where they have made friends. Somewhere

in between you have those that believe the local space is a place where they like to go with family, for a walk or exercise – an escape from everyday life.

- 14.9. One person in favour of dogs off-lead commented, *'as a daily user for the past 5 years or so I have had so many positive experiences that on hearing all the negativity around mourners and non-dog owners makes me feel shocked and horrified- I wonder whether I might be living in some parallel universe'*. Different types of users have been experiencing the space in different ways, some positively and some negatively. The respondent then goes on to say, *'in light of the last month or so, when the council have awakened the call for dogs on lead or a complete ban from POC, it feels as if it has divided the community, when in fact we should all be working together in harmony so we can share this space of beauty'*. The intention of the Council is most certainly not to cause a divide. However, the reality is, the non-dog walkers feel the negative encounters they have experienced have gone on for so long, whilst on the other hand, dog walkers have been enjoying positive experiences walking their dogs off-lead.
- 14.10. The results also showed those visiting graves and other visitors don't feel understood, they want dog owners to appreciate that not everyone loves dogs and even if they do like them, they don't want to have to be near them, interact with them or hear them when they are visiting the cemetery. Some visitors reported dog walkers as being territorial, stating that dog walking is seen as more important than any other activity in the cemetery. Respondents also mentioned that dog walkers treat the cemetery like a dog park.

Number of Dogs

- 14.11. It is understood by cemetery staff that anywhere between 80-150 dogs frequent POC on any given day. It is unclear why, but the survey carried out by DOPOC contradicts this number and shows that on 5 November 2024 alone, 290 dogs entered the cemetery. To date, POC has been a shared space between dog walkers, those visiting graves and those that visit for recreational purposes. If the number of dogs has reached almost 300 daily, this may be part of non-dog visitors cause for concern.
- 14.12. The pandemic saw an increase in dogs being bought and/or rescued. DOPOC's submission also confirms a considerable number of local people acquired their dogs specifically intending to use POC to exercise them. This may have also added to the increase in the number of dogs.
- 14.13. It is worth acknowledging that this is above the levels of the population, with estimates for the dog population ranging from 28% of UK adults having a dog (2024 PDSA Animal Wellbeing (PAW) Report¹, to 46% of London homes having a dog (data from UK Pet Food's Pet Population research²).

Professional Dog Walkers

- 14.14. Brent Council currently enforces a 4 dogs per person rule. To ensure better control of dogs in POC, a further restriction on dog numbers could be imposed. Consideration should however be given to include animal welfare professionals' advice surrounding groups such as professional dog walkers, who may be unfairly excluded because of a 'number' restriction. There is no information in the consultation analysis that

¹ <https://www.pdsa.org.uk/what-we-do/pdsa-animal-wellbeing-report/uk-pet-populations-of-dogs-cats-and-rabbits>

² <https://www.ukpetfood.org/resource/london-leads-the-pack-as-the-uk-s-pet-capital.html>

suggests the number of dogs should be increased. To the contrary, both those in favour or opposed to dogs off-lead or those that would prefer a ban, mostly agree that the numbers of dogs are an issue.

- 14.15. Those in favour of dogs on and off lead and those in favour of a ban all agreed that professional dog walkers are an issue because of the number that drive to the cemetery and further the number of dogs they bring with them. As mentioned above, consideration should be made regarding the potential exclusion of a particular group of people such as professional dog walkers. Animal welfare professionals suggest the introduction of a Licensing scheme which regulates things such as the walkers experience and the dogs' temperament.

The Graves in POC

- 14.16. A number of those who walk dogs in POC consider the newer burial area known as the 'mound', to be the area where dogs should not be permitted. The areas outside of the mound are considered to have graves so old that dog walking and/or running freely should be permitted. One respondent in favour of dogs off-lead commented, *'I am also very concerned that the survey does not ask about different parts of POC. For example, of course I wouldn't want a dog running over a new grave, but a 100 year old, fallen grave is a different matter'*. Another said, *'Regarding your leading and biased question about whether or not dogs should be allowed to walk/run over graves, one cannot give a simple yes or no answer – it needs to be in context. New graves or any clearly still-attended graves, then no. And neither those on the mound as they are much more recent graves, tended to the most and where there are a number of signs up saying "no dogs". However, regarding the predominant large areas containing significantly older and neglected graves, I don't see a problem'*.
- 14.17. The question here is how old does a grave have to be for it to be disregarded as a grave? Or should it be disregarded at all? The cemetery is presently approaching full capacity with approximately 70% of headstones being visible. If we take for example the mound, there are burials that took place in the early 2000's and others in 2017 and 2019. These graves are in amongst the 'older' graves and some without headstones and therefore not always easy to detect the old vs new. As mentioned previously, POC is likely to be subject to the grave reclamation process in order to continue the provision of grave spaces. As a result of this consultation review and in an attempt to balance the provision of said grave spaces, consideration of areas 3X & 3Z which are made up of historic common graves, on land that is not consecrated or privately owned, could be considered as an option to carve out an area which would potentially enable off-lead dog walking.

Displacement

- 14.18. The comments provided by several respondents in relation to displacement mentioned persons having to drive further afield to walk their dog, it's worth noting "the additional driving" would go against Brent's Climate Emergency strategy 2021-2030. Animal Welfare advice includes considering any displacement that is caused by the implementation of on-lead requirements or a ban prohibition which may prevent sufficient off-lead exercise for dogs.

Vehicle Access

- 14.19. The data from the consultation suggests that some of the visitors who walk dogs, travel there by means of driving. **81 (9%)** of respondents said they drive to the cemetery to walk a dog. The results of the consultation indicate that the number of those that walk a dog, who visit a grave and or drive to the cemetery is **7 (1%)**. It is

important to distinguish between those that *only* walk a dog and drive to the cemetery and those that are visiting a grave, walk a dog and or drive to the cemetery, as those visiting a grave may not have a choice other than to drive, if they are travelling from afar. In line with the RSPCAs comments, it would be unfair for dog owners to leave the dog behind with no one to care for them or be left in a vehicle whilst they tend to the grave.

- 14.20. For persons that are walking a dog, the expectation would be they live in the 'locality' described earlier in the report and therefore walk to the cemetery. For anyone that drives to the cemetery to walk a dog, it is likely they have been displaced from a green space local to where they reside.
- 14.21. The survey carried out by DOPOC showed that 80 persons travelled to the cemetery in a vehicle in one day, however it is unclear what the purpose of their visit was. In addition, some of the comments made by those completing the consultation, commented that some people visit the cemetery to walk their dog because of the free parking that is available.
- 14.22. The consultation responses suggest that both those in favour of off or on-lead walking and those who would prefer a ban agree that the number of vehicles that attend the cemetery are an issue, albeit for different reasons.
- 14.23. To manage the number of dogs entering the cemetery, a restriction on those accessing the cemetery by vehicle to walk dogs could be put in place with the exception of assistance dogs or those that are visiting a grave (with prior consent). This would ensure the cemetery is limited to use by the local community and those visiting graves.

Dog Ownership

- 14.24. Dog owners have a personal and legal obligation towards their dog's wellbeing. Dogs are considered an intrinsic part of the family who provide companionship. Dog owners mentioned that having a dog encourages socialising with others in the community, prevents isolation and is good for mental health – the benefits therefore extending to their owners.
- 14.25. One respondent commented, *'I am the guardian of an extremely well behaved dog. As a retiree, I felt socially isolated before I got a dog. Since my dog arrived, I have built a social life around him, especially with regard to the humans and dogs I meet at POC. 80 percent of my social circle revolves around POC.... Walking my dog in POC contributes to my physical and mental health. In other words, walking with dogs aligns with local and national government advice and aims on physical and mental health'*.
- 14.26. The PSPO guidance states that Councils should consider that dog owners have a duty under the Animal Welfare Act 2006, to provide for their animal's welfare, which includes exercising them and therefore should accommodate this need. The guidance also encourages Councils to provide a list of alternative sites for dog walkers to exercise their dogs without restrictions.
- 14.27. Walking off-lead is important to the well-being of dogs; it is essential for their physical and mental health and prevents negative behaviour.

Dog Behaviour Affecting Cemetery Visitors

- 14.27 Those in favour of dogs off-lead confirm they pick up their dog's excrement and even pick up after others. Some of those respondents mentioned that the defecation on graves is caused by foxes but being blamed on dogs. Others mentioned the defecation being related to outdoor cats. As explained in the Consultation Analysis report there are differences between dog and fox faeces, the biggest difference being the smell.
- 14.28 This isn't to say that foxes and cats aren't defecating on graves or that it doesn't upset grave visitors, the difference being however that there is an expectation that foxes and cats will unknowingly foul wherever they want without having any consideration – it is natural for them to do so. Whereas the owners or walkers of dogs are knowingly allowing their dogs to defecate either because they aren't bothered by this, or they aren't paying attention to what their dogs are doing and then miss when the defecation takes place. One respondent commented, 'Wildlife in any cemetery would wander over, urinate and pooh on graves in both urban and rural settings, so I don't think that having people note that dogs do it is all that relevant'. The respondent then goes on to say, 'What is relevant is mandating that dog owners pick up the pooh and be vigilant'.
- 14.29 The same goes for urination, an owner that allows a dog to urinate at the edge of a grave or cannot see when their dog is doing this, can be really upsetting for those that don't agree with this behaviour. The urination cannot be seen once dry, but it is the act of urinating in the first place that is upsetting. The same goes for the act of defecating, it is the fact that a dog is being permitted to defecate on or near a grave that causes the upset and then causes further distress when it isn't picked up. The graves contain people's loved ones or the loved ones of others and this is what is causing their distress.
- 14.30 Dog games including balls and frisbees are other activities that some respondents in favour of off-lead, on-lead or would prefer a ban on dogs, agree is an issue. One person in favour of dogs off-lead said, *'Agreed that people should not be throwing balls here as it could cause damage'*, whilst another in favour of dogs on-lead said, *'I think a walk on a lead with a dog is no problem, but running dogs off the lead playing frisbee and ball games on graves is not nice or respectful'*.
- 14.31 *One of the respondents stated, 'regarding your leading and biased question about whether or not it's ok to play ball, frisbee etc with dogs in the cemetery, children play with such items there so why not dogs – I don't see the difference, so should children be banned from doing so too?'* To date, we have not received any complaints in relation to the conduct of children in the cemetery.

Respect for Visitors

- 14.32 One respondent commented, *'Careful respect should be paid to visitors and at burials, that goes without saying. But don't close it just because dogs run around happily'*. It is the presence of dogs running around that some visitors object to and it is "disrespectful" and "unnerves them". This is particularly the case for those persons who unwillingly have dogs approach them. Whereas dog walkers may know and understand their dog's behaviour, those that come into contact with dogs, may not want to be approached and may feel apprehensive. A dog walker may see their dogs as 'friendly' and as just 'wanting to play', but for some this will feel 'intimidating and scary'. One respondent said 'I always pick up after my dog & apologise if ever my dog approaches anyone who appears nervous'. However, for some this apology may come too late.

- 14.33 Respondents raised concerns that there are those dogs that jump up or chase people (for example someone running) or those that whilst playing with another dog run into other visitors and this can feel alarming and frightening. Some visitors don't want dogs running around them, coming up to them or jumping on them. One respondent stated *It can also cause accidents, 'I have suffered concussion recently as a result of being run over by someone's out of control dog - it was chasing another dog and ran right under me on the path and I hit my head hard on the concrete. I am still recovering two months later and have had to take time off work, visit hospital and have an MRI. The owner was a long way away and did not take responsibility. Whilst I appreciate there are lots of dog owners who are responsible and have well trained dogs, there are just as many whose dogs sprint across paths, well out of sight and they sprint at speed across paths, not just on the grass areas'.*
- 14.34 A few of the respondents mentioned their 'peace and quiet' being 'interrupted and ruined by dogs running freely, dogs barking, voices and shouting from the dog walkers when calling their dogs'. The distress, frustration and upset for these visitors is exacerbated as they feel their choice of grieving is taken away, *'It particularly distresses me when I see dogs running freely over and between the graves. I have nothing against dogs but there are other open spaces and a cemetery, still very much in use and frequented by often-grieving people, is not the place for them'.*
- 14.35 Respondents in favour of dogs on-lead or a complete ban were also disturbed by dogs digging, ornaments and flowers that have either been removed or knocked over on graves and dog attacks that have taken place. Burials were also mentioned by a few as being an issue when dogs are left off-lead and were found to be a sign of disrespect during a time when people are grieving.
- 14.36 A few respondents stated they have stopped visiting the cemetery because they are fearful of dog behaviour and the anticipation of what may happen. A few others stated they regretted buying graves, whilst others stated they are glad they made the decision not to purchase one.
- 14.37 There were several people that commented on visitors to graves being so infrequent, that as the main users, dog walking should take precedence. Others commented on it being unfair that their off-lead walking should be stopped as a result of a few individuals that can't follow the rules.
- 14.38 A few dog walkers are reported as being responsible but those that aren't, are described as being 'distracted, ignoring their dogs, and allowing them to run freely over graves'. Dog walkers stated they are shocked and devastated by the thought of any changes that may mean their dogs will no longer be able to exercise off-lead. This is understandable, particularly if they have been able to walk their dog off-lead for a long period of time. Some dog walkers agreed that dogs should be kept under control at all times and do everything they can to ensure they are respectful of other visitors.
- 14.39 Respondents in favour of dogs off-lead have expressed they will no longer visit the cemetery if their dogs are required to be on a lead or a ban is put in place. They also state that this will affect the community space that has been built with others. Several dog walkers reported never having seen any dogs misbehaving in the cemetery and in particular urinating or defecating on graves.

PSPO as a Deterrent

- 14.40 Having a PSPO in place, which is communicated well, for example through various channels such as social media or signage, acts as a strong deterrent to anti-social

behaviour in the first instance. If over time, the PSPO influences a cultural change just by its mere presence, the PSPO in itself can be justified as a success from the Council's perspective.

Enforcement

- 14.41 In order to carry out enforcement of any type, the prohibition of any activity needs to be clear. As discussed in the Consultation Analysis, some of the issues surrounding enforcement are explained as to why they must be included in a particular way. For example, the introduction of a specific lead length is suggested only as an indication to any enforcement officer that an owner/walker is complying.

ASB Unrelated to Dogs

- 14.42 Those in favour of dogs on-lead or a complete ban did not mention any general ASB outside of dogs and/or their owner's behaviour.
- 14.43 On the other hand, those in favour of dogs off-lead that mentioned ASB had distinct points of view; 1) the requirement to put dogs on lead would lead to a decrease in footfall and ASB would increase, 2) the current presence of dogs prevents ASB. Some respondents stated 3) there is existing ASB that needs resolving – alongside any dog related issues. One respondent stated, *'there have been reports of drug dealing as it is a quiet space. This needs to be tackled with equal severity as the discussion about dog walkers'*. It is therefore unclear how prevalent ASB relating to drug issues are, as to date minimal complaints regarding ASB, not related to dogs.

Bins

- 14.44 Many people believe that additional bins are required in the cemetery. It is unclear whether dog walkers are aware that dog excrement can be placed in any bin and this may be one of the reasons that additional bins have been requested.
- 14.45 The bins in POC consist of normal waste bins and dog waste bins. In the UK, dog waste can be disposed of in any public bin, including specialist dog waste bins, as long as the waste is bagged. If a general litter bin is not available, dog waste can be bagged and taken home and placed in the general domestic waste bin.

Summary

- 14.46 It is clear the number of dogs that frequent the cemetery and the adverse activities incidental to these visits has increased in the last four years and are having an impact on other users of the cemetery. It is evident that POC can no longer sustain the number of dogs that visit daily because of that detrimental impact it is having on the community.
- 14.47 A decision needs to be made as to whether a *cemetery* is the type of place where dog walking should take place in the first instance and if it is to continue, consideration for what measures should be put in place to ensure there is a balance between all of those that visit.
- 14.48 The issue of displacement should be considered and include: -
1. those that have over time been displaced from parks further afield and are now driving to the POC cemetery
 2. those that choose to access POC over other local spaces where dog walking off-lead already exists

3. those that live in the 'locality' and do not have an outside area to exercise their dogs appropriately.
 4. those that live in the locality but are physically unable to walk long distances to an alternative location in order to exercise their dog.
- 14.49 Consideration should be made to allocating an enclosed area within POC which allows off-lead walking.
- 14.50 As the cemetery is completely filled with graves, further investigation into what section would be appropriate to achieve this would need to be undertaken. Such an investigation would need to consider the type of graves present in the proposed enclosed space, whether visitors to the cemetery/grave owners agree with this, whether the land is consecrated and what impact an enclosure would have on neighbouring residences (in terms of for example, noise). It would also need to consider the maximum number of dogs that would be permitted in the space at any one time to prevent negative behaviour including dog on dog attacks.
- 14.51 The cemetery is a working cemetery and will continue to be in the foreseeable future. **842 (98.5%)** who responded in the consultation are aware the cemetery is still used for burials. What is expected of visitors in relation to where they should and should not walk in the cemetery, particularly in relation to dogs needs to be clearly communicated.

15. Options

- 15.1. A number of options to control dog behaviour were suggested in the consultation by respondents. A non-exhaustive list includes: -
- Make the central area more secure/fenced off
 - Don't permit cars into the cemetery
 - Wardens to patrol area
 - Limit number of dogs
 - Limit to guide dogs
 - Limit to local residents
 - Reduce the number of dog walkers
 - Dogs on leads during burials
 - Set hours for dogs off leads
 - Be registered as a dog walker in POC
 - Designate an area for dogs to be off leads or make dogs wear hi vis jacket with a code that is linked to an address.
 - Dogs kept away from the mound when a burial is taking place
 - Close the cemetery for dog walking during a burial
 - Shrub boarder around the lawn that has the cremation memorials as there is around the lawn nearest the war graves
 - More dog bins
 - Restrict dogs off lead to specific times
 - Provide an alternative space
 - Clearer signage
 - Ask for dog owners to avoid an area when a burial is taking place
 - Set times for dogs off lead walks
 - Queens Park golf area - not a choice
 - Dogs on leads when a funeral is taking place

- Congressional Cemetery in Washington DC allows dog to run free. They charge a fee (annual or per visit) for visitors who want to bring their dogs to the cemetery, and this is used toward upkeep of the graves, landscaping, etc.
 - Volunteers could monitor area
 - Use areas for dogs with little to no graves
 - Reasonable for the cemetery to be closed to dogs during burials.
 - Option to have restricted access so for example on a Monday to Saturday the cemetery was for mourners only between certain hours e.g. 12 and 3 and burials took place during these hours? and maybe for mourners on a Sunday?
 - Sign post Tiverton Green on gate for people that would like their dog to be off lead
 - Dogs on leads that are no more than 2 meters at ALL times should be welcomed, with no more than two dogs together - Tiverton offers plenty of space for dogs & their owners to socialise
 - Frequent sweeps to fine people in breach of conditions
- 15.2. Whilst it is permissible to do nothing and maintain the status quo, that will not address the increasing dog complaints (activities) having a detrimental effect on the quality of life of those in the locality. Accordingly, taking into account the suggestions made by the consultation respondents and having regard to the evidence obtained, a series of suggested measures varying the existing PSPO prohibitions re POC, in order to manage the increase in dog behaviour complaints are listed in the tables below for further consideration and selection.
- 15.3. Once the prohibitions or requirements are decided, a decision report will set out the prohibitions or requirements, to be included and enforced under the PSPO by way of a variation.

Dog Access*

Dog Access*		Current Status	Proposed						
			Access time			Lead		Area Access	
		POC	Any time	Specific Time	No Access	No lead	On a lead	Pathways only	Entire Cemetery
Option 1	Permit access by dogs to POC <u>off lead</u> at any time**	✓	✓			✓			✓
Option 2	Prevent any access by dogs to POC at any time.				✓				✓
Option 3	Permit access by dogs to POC on a lead with <u>access to the entire cemetery at any time</u>		✓				✓		✓
Option 4	Permit access by dogs to POC on a lead during <u>specific times</u> with <u>access to the entire cemetery</u>			✓			✓		✓
Option 5	Permit access by dogs to POC on a lead with access to <u>pathways only at any time</u>		✓				✓	✓	
Option 6	Permit access by dogs to POC on a lead during <u>specific times</u> with access to <u>pathways only</u> .			✓			✓	✓	

* This must be read in conjunction with the 'Access Timings' table below

** This must be read in conjunction with the 'Dog Control' table below

Access Timings

Access Timings		Current Status	Proposed									
		Access time			Lead		Area Access		Specific Timings			
		POC	Any time	Specific Time	No Access	No lead	On a lead	Pathways only	Entire Cemetery	Morning*	Afternoon*	None
Option 7	Permit access by dogs to POC off lead at any time in any area	✓	✓			✓			✓			✓
Option 8	Permit access by dogs to POC on lead at any time in any area.		✓				✓		✓			✓
Option 9	Permit access by dogs to POC on lead at any time on pathways		✓				✓	✓				✓
Option 10	Permit access by dogs to POC <u>off lead</u> at specific times in the morning			✓		✓			✓	✓		
Option 11	Permit access by dogs to POC <u>off lead</u> at specific times in the afternoon			✓		✓			✓		✓	
Option 12	Permit access by dogs to POC <u>off lead</u> at specific times in the morning and afternoon			✓		✓			✓	✓	✓	
Option 13	Permit access by dogs to POC <u>on a lead</u> at specific times in the morning in any area			✓			✓		✓	✓		
Option 14	Permit access by dogs to POC <u>on a lead</u> at specific times in the afternoon in any area			✓			✓		✓		✓	
Option 15	Permit access by dogs to POC <u>on a lead</u> at specific times in the morning and afternoon in any area			✓			✓		✓	✓	✓	
Option 16	Permit access by dogs to POC <u>on a lead</u> at specific times in the morning with access to pathways only			✓			✓	✓		✓		
Option 17	Permit access by dogs to POC <u>on a lead</u> at specific times in the afternoon with access to pathways only			✓			✓	✓			✓	
Option 18	Permit access by dogs to POC <u>on a lead</u> at specific times in the morning and afternoon with access to pathways only			✓			✓	✓		✓	✓	

* The timings for morning and/or afternoon need to be defined by the decision maker based on the report findings

** Access to POC in general by dogs on/off lead will need to be taken into consideration in the first instance

Burials

		Current Status	Proposed							
			Access time			Lead		Area Access		
		POC	Any time	Specific Time	No Access	No lead	On a lead	Specified areas	Pathways only	Entire Cemetery
Option 19	Permit access by dogs to <u>burials off lead</u> .	✓	✓			✓				✓
Option 20	Permit access by dogs to <u>burials on lead</u> .									
Option 21	<u>Prevent dogs from accessing</u> the cemetery <u>when a burial is taking place</u> .				✓					✓
Option 22	Restrict access by dogs to POC during burials by <u>requesting they are on lead during specific times</u>			✓			✓			✓
Option 23	Restrict access by dogs during burials to <u>specific areas on a lead during specific times</u>			✓			✓	✓		

Signage Provided at Burials

		Current Status	Proposed						
			Access time			Lead		Area Access	
		POC	During Burial	Specific Time	No Access	No lead	On a lead	Specified areas	Entire Cemetery
Option 24	Supply signage at the entrance to the cemetery at least 24 hours before burial notifying visitors a funeral is taking place including the timings	✓		✓					
Option 25	Supply signage at the entrance to the cemetery at least 24 hours before burial notifying visitors a funeral is taking place including the timings and no access for dogs			✓	✓				✓
Option 26	Supply signage at the entrance to at least 24 hours before burial notifying visitors a funeral is taking place including the timings and permitted access for dogs on lead in any area		✓	✓			✓		✓
Option 27	Supply signage at the entrance to the cemetery at least 24 hours before burial notifying visitors a funeral is taking place including the timings and access for dogs on lead in specified areas		✓	✓			✓	✓	
Option 28	Supply signage on the pathways leading to the burial <u>advising</u> people put dogs on a lead and not to allow dogs beyond that point	✓	✓				✓	✓	
Option 29	Supply signage on the pathways leading to the burial <u>requesting</u> people put dogs on a lead and restricting dogs beyond that point		✓				✓	✓	

Dog Control

		Current Status	Proposed					
			Access time			Lead		Area Access
		POC	Any time	Specific Time	No Access	No lead	On a lead	Specified Areas Entire Cemetery
Option 30	For dogs off lead - Any person(s) responsible for a dog; a. where the dog is not reasonably within eyesight of the responsible person(s) and/or where a dog does not respond to being beckoned (recalled) by the owner b. who fails to follow instructions by an authorised officer to put a dog on a lead.	✓	✓			✓		✓
Option 31	Permit an unlimited distance between dog and dog owners/walkers at any time		✓			✓		✓

Dog Fouling

		Current Status	Proposed					
			Access time			Lead		Area Access
		POC	Any time	Specific Time	No Access	No lead	On a lead	Specified Areas Entire Cemetery
Option 32	Any person(s) responsible for a dog at the time, who fails to pick up their dog mess (faeces) immediately and dispose of it in an appropriate receptacle (public bin or taken away with them). Exemptions: This prohibition is not to be enforced against any person with a disability that affects their mobility, manual dexterity, physical coordination, ability to lift, carry or otherwise move everyday objects, and those persons who are in charge of an assistance dog which has been trained to assist them.	✓	✓			✓	✓	✓

Lead Length*

Lead Length*		Current Status	Proposed								
			Lead		Area Access		Lead Length				
		POC	No lead	On a lead	Specified areas	Entire Cemetery	2 metres	3 metres	4 metres	5 metres	Unlimited
Option 33	Dog lead should be up to 2 metres in length			✓		✓	✓				
Option 34	Dog lead should be up to 3 metres in length			✓		✓		✓			
Option 35	Dog lead should be up to 4 metres in length			✓		✓			✓		
Option 36	Dog lead should be up to 5 metres in length			✓		✓				✓	
Option 37	Dog lead can be unlimited			✓		✓					✓

* This must be read in conjunction with 'Access Timings' table above

Vehicle Access

		Current Status	Proposed							
			Access time			Visitor Type				
		POC	Any time	Specific Time	No Access	All	Dogs in Vehicles	No dogs in vehicle	Assistance Dogs	Dogs visiting graves (with prior consent)
Option 38	Allow unrestricted vehicle access at any time	✓	✓			✓				
Option 39	Restrict vehicle access to vehicles with assistance dogs only at any time		✓						✓	
Option 40	Restrict vehicle access to vehicles without dogs, those with assistance dogs and those visiting a grave with a dog (prior consent required)		✓					✓	✓	✓

Restriction on Dog Numbers

		Current Status	Proposed						
			Dog Numbers						
		POC	2	3	4	5	6	Unlimited	Set a total amount of increased number of dogs
Option 41	Maintain the number of dogs permitted per person to 4	✓			✓				
Option 42	Reduce the number of dogs permitted per person to 2		✓						
Option 43	Reduce the number of dogs permitted per person to 3			✓					
Option 44	Increase the number of dogs permitted per person 5					✓			
Option 45	Increase the number of dogs permitted per person 6						✓		
Option 46	Increase the number of dogs permitted per person to an unlimited number							✓	
Option 47	Increase the number of dogs person to a set number								✓

Ball/Frisbee games

		Current Status	Proposed						
			Access time			Lead		Area Access	
		POC	Any time	Specific Time	No Access	No lead	On a lead	Pathways only	Entire Cemetery
Option 48	Permit ball/frisbee and any other games with or without dogs in any area	✓	✓			✓			✓
Option 49	Ban ball/frisbee and any other games with or without dogs in any area				✓	✓			✓

Bins

		Current Status	Proposed
		POC	Entire Cemetery
Option 50	Maintain number of bins which is currently 22	✓	✓
Option 51	Increase number of bins in POC (Choose number to increase by)		✓

Report sign off:

Peter Gadsdon
CORPORATE DIRECTOR Partnerships, Housing and
Resident Services