

Overview and Scrutiny Committee Report  
Report of Director of Service Delivery  
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## **Guildford Crematorium Air Quality Audit**

### **Executive Summary**

This report follows the Guildford Crematorium Redevelopment post project review item, which was considered by this Committee on 2 March 2021, the report stated:

*3.2.19 Following enquiries received from member of the public in regard of the emissions stack and subsequent internal investigation by the Council, the emissions stack had to be extended from 8.1m to 9.0m. This included identification of the error to Regulatory Services on 24 April 2020 and a revised permit being issued by Regulatory Services on 11 June 2020 with a condition for stack height to be amended by 9 October 2020. The extended stack received planning consent on 16 September 2020 and was installed on 26 September 2020.*

*3.2.20 This investigation into the error concluded a human error in calculating the stack height in accordance with HMIP D1 guidance and interpretation of the architectural drawings. The Council is also undertaking an external audit of this issue.*

The external audit referred to above has now been completed and is contained at Appendix 1 of this report and the conclusions are set out in Section 3. The internal review into the error referred to in the 2 March 2021 report is contained at Appendix 2.

### **Recommendations to the Committee:**

- (1) That the Committee notes the SLR audit.
- (2) That the Committee considers the conclusions of SLR as set out in Section 3 of the audit and endorses the recommendations therein.

### **Reasons for recommendations:**

- (1) It is appropriate that the Committee are made aware of and note the audit carried out by SLR and its outcome
- (2) SLR set out its conclusions for the Council to consider and this is set out in Section 4 of this report.

**Is the report (or part of it) exempt from publication? No**

## **1. Purpose of Report**

- 1.1 The purpose of this report is to place before Members the outcome of the external audit by SLR relating to the Guildford Crematorium so they can note and consider the recommendations of SLR.

## **2. Strategic Priorities**

- 2.1 The effective delivery of projects such as the Guildford Crematorium Redevelopment are fundamental to the Council's strategic framework. When issues are then raised in relation to the delivery of projects, it is important they are properly investigated. This is what the Council did. Therefore, although this report does not directly impact upon the Council's strategic priorities, indirectly it is significant given the importance of effective delivery of major projects to the realisation of the Council's vision.

## **3. Background**

- 3.1 The background to the reasons and delivery of the Guildford Crematorium Redevelopment project is contained in the report to this Committee on 2 March 2021. The Guildford Crematorium achieved practical completion on 20 March 2020.
- 3.2 Following enquiries received from a member of the public in regard to the emissions stack and subsequent internal investigation by the Council, the emissions stack had to be extended from 8.1m to 9.0m. This included identification of the error to Regulatory Services on 24 April 2020 and a revised permit being issued by Regulatory Services on 11 June 2020 with a condition for stack height to be amended by 9 October 2020. The extended stack received planning consent on 16 September 2020 and was installed on 26 September 2020.
- 3.2 An internal investigation into the error took place in September 2020 and concluded a human error in calculating the stack height in accordance with HMIP D1 guidance and interpretation of the architectural drawings. The internal investigation is contained at Appendix 2 of this report.
- 3.3 An external audit by SLR was commissioned by the Council February 2021, due to the original auditor moving companies the final audit was not completed until 14 October 2021 and this is contained at Appendix 1.

## **4. Conclusions and recommendations of the SLR Audit**

- 4.1 The SLR Audit's conclusions and recommendations are as follows:
- The D1 calculation submitted with the tender submissions was not considered in scoring of the submissions and it was not material in the eventual commissioning of the contractor.
  - The planning application process for the replacement crematorium dealt with the potential conflict of interest in accordance with LGA guidance, i.e., by referral to planning committee.

- The approach to requirements for air quality impact assessment to support the planning application accorded with the NPPF, i.e., given the existing crematorium was an established land-use with an existing environmental permit, emissions to air would be dealt with through the pollution control regime. As such, in this case, a detailed review of flue height in terms of impacts on air quality (i.e., D1 calculation), was not required for consideration within the planning decision.
- The Council's Regulatory Services contracted a company to provide a technical review of the environmental permit variation application, given the Council were both the applicant and the regulator to address any potential conflict of interest.
- The Council's internal review describes the errors in the D1 calculations with regards to the building width input parameter, that were used to inform the planning and environmental permit variation submissions. The error is not disputed by the parties involved. The error, as described in the internal audit is a combination of misinterpretation of the D1 guidance and not verifying the correct dimensions from design drawings.
- There is no detailed evidence, either within the internal audit, or presented by any parties for the purposes of this audit, demonstrating the technical review undertaken by a company, that led to the decision to issue the environmental permit Variation.
- The complaints procedure response appeared slow, this is attributed by the Council to the Covid-19 pandemic with both Regulatory Services and Parks and Countryside who operate the crematorium significantly involved in the response.
- It is recommended that measures or procedures are reviewed and where necessary improved, to allow Regulatory Services to satisfy themselves that work undertaken on their behalf has been undertaken in a comprehensive and technically robust manner, such as:
  - requiring evidence of the audit procedure, and documented audit trail; and
  - requiring contractors to have a quality assurance system certified to a recognised standard (e.g., ISO 9001).

4.2 Officers concur with and support the above conclusions and recommendations.

## **5. Consultations**

5.1 SLR consulted with all parties involved in as part of the audit process.

## **6. Financial Implications**

6.1 There are no financial implications arising from this report.

## **7. Legal Implications**

7.1 There are no legal implications arising from this report.

## **8. Human Resource Implications**

8.1 There are no human resources implications arising from this report.

## **9. Equality and Diversity Implications**

9.1 There are no equality and diversity implications arising from this report.

## **10. Climate Change/Sustainability Implications**

10.1 These are detailed in the external audit.

## **11. Summary of Options**

11.1 The Committee are asked to note the reports which set out the findings of the audit carried out by SLR. The Committee are also invited to reflect upon the conclusions contained in the audit and if they agree with SLR, consider how best they may be taken forward.

## **12. Conclusion**

12. SLR's conclusions are detailed in the audit and in Section 4 above.

## **13. Background Papers**

Guildford Crematorium Development post project review report dated 2 March 2021 [Item 06 - Guildford Crematorium OSC Report for publication.pdf](#)

## **14. Appendices**

Appendix 1: SLR Air Quality Assessment Audit dated 14 October 2021  
Appendix 2: Internal review in the crematorium stack height error dated  
September 2020