

**POLICY NAME**

Penrith Cemeteries Policy

**DATE ADOPTED**

10 October 2011

**ECM NUMBER**

[Click here to enter text.](#)

**REVIEW DATE**

November 2020

**RELATED DOCUMENTS**

[Click here to enter text.](#)

**POLICY NUMBER**

PDAS01

**COUNCIL MINUTE NUMBER**

PRC63

**POLICY TYPE**

Council

**RESPONSIBLE DEPARTMENT**

Facilities

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**Purpose**

The Cemeteries Service is responsible for the management and maintenance of Council controlled cemeteries within the Penrith Local Government Area and the preservation and conservation of heritage elements within Penrith, St Marys, Emu Plains, St Stephen's and Castlereagh Anglican Cemeteries.

This Policy will assist in the administration, management, operations, maintenance and future development of the Penrith City Council cemeteries. It will provide effective guidelines that will assist in ensuring the objective functions of the cemeteries are carried out in accordance with statute and common law, regulation and national standards that guide the management and operation of cemeteries.

**Policy Statement**

The policy aims to provide safe, consistent and socially acceptable standards and practices, for the benefit of Council workers, funeral industry representatives, administrators, clients and members of the general public. It will also ensure the conduct of those entering the cemeteries is in accordance with reasonable and practical standards.

**1.1 Commencement**

This Policy is to commence as of <date to be defined>

**1.2 Application**

1.2.1 This Policy applies to all cemeteries, controlled, managed, administered, operated and maintained by Penrith City Council.

## 1.3 Definitions

- 1.3.1 **Applicant** means the person making an application;
- a. To obtain an Interment Right;
  - b. To obtain a work permit or other Council consent; or
  - c. To have the body of a deceased buried;
  - d. To have the remains of a cremated body interred in the cemeteries;
  - e. To have a deceased person commemorated in a cemetery; or
  - f. For any other bereavement service provided by the Council and that is subject to an application process.
- 1.3.2 **At Need** is the purchase of a burial site/plot at time of death.
- 1.3.3 **AS-4204** means the Australian Standards Association's Standard "AS4204-1994 Headstones and Cemetery Monuments".
- 1.3.4 **Burial** means the act of burying, interring or immuring the remains of a deceased person.
- 1.3.5 **Burial Request Confirmation Form** is the form used by council to book burial services.
- 1.3.6 **Burial Licence** has been superseded by the interment right.
- 1.3.7 **Burial Site/Plot** means a grave or plot, or other place for the disposition of human remains, whether cremated or not.
- 1.3.8 **Interment Right** means the grant by a reserve trust of an exclusive right to bury one or more (human) bodies in a burial place.
- 1.3.9 **Holder** in relation to a burial or niche reservation, means the person recorded, in the register kept by Council, as the holder of the burial or niche reservation.
- 1.3.10 **Casket/Coffin** is a general term to describe coffins and containers used to hold human remains.
- 1.3.11 **Cemetery or Cemeteries** mean an area containing one or more burial sites and in this case is administered and controlled by Penrith City Council.
- 1.3.12 **Council means** Penrith City Council.
- 1.3.13 **Crematorium** means the whole of the facility where cremation services are conducted, including the Chapel, crematory, vestry, and surrounding area.
- 1.3.14 **Crown Land** means land owned by government. In NSW the nominal owner is the Minister for Lands. In this context the lands are allocated to Trusts and Local Councils and are dedicated as cemeteries.

- 1.3.15 **Exhumation** means the removal of the remains of a dead person or stillborn child from a burial site.
- 1.3.16 **Funeral Director** means an individual or business carrying out funeral services.
- 1.3.17 **Lowering Device** is a mechanism used for lowering the casket/coffin into the grave/burial site.
- 1.3.18 **Monument** means any structure, plaque, headstone, masonry, metal work, casting or item placed over, in or around a burial site.
- 1.3.19 **Monumental Mason** is a tradesman, mason or person possessing the skills to carry out Monumental Masonry work.
- 1.3.20 **NSW Cemeteries & Crematoria Act 2013 – NSW Legislation**
- 1.3.21 **Public Health Regulation** means the “Public Health Regulation 2012 (Disposal of Bodies) Part 8”.
- 1.3.22 **Register** means Council’s formal data repository containing all the required details relating to burials, cremations, memorial sites, or Interment Right.
- 1.3.23 **Reservations** means a pre-need burial site/plot, ashes niche or ashes garden site.
- 1.3.24 **Wrapping** is a tapa cloth print wrapping that is placed around coffin or casket at time of burial.

## **2 Management of Cemeteries**

### **2.1 Compliance with Crown Lands Act 1989 and By-Laws there under;**

2.1.1 This policy is aligned with the *NSW Cemeteries & Crematoria Act 2013*, “Crown Lands (General Reserve) By-Law 2006” and the “Crown Lands (General Reserves) Amendment (Sustainable Burial) By-law 2011” to ensure that the Crown Land Cemeteries administered by Penrith City Council work within a recognised legal framework.

#### **2.1.2 Planning, Conduct and Maintenance of Cemeteries**

Council may make such provisions as it considers necessary for the following;

- 2.1.2.1 Provide future burial sites/plots in Penrith General Cemetery, all future burial sites/plots will be lawn only sections and allocated as Non- Denominational.
- 2.1.2.2 The size, multiple use and location of burial sites.

- 2.1.2.3 The carrying out of work by funeral directors in the cemeteries.
- 2.1.2.4 The carrying out of work by monumental masons and other contractors in the cemeteries.
- 2.1.2.5 The establishment of standards of construction and design for monuments and structures.
- 2.1.2.6 The qualifications required by, and the application fees to be lodged by, monumental masons and other contractors;
- 2.1.2.7 The improvement and maintenance of all cemeteries;
- 2.1.2.8 The placing of vases, statuettes, jars, bottles or other items of embellishment on or near burial sites, monuments or wall and garden niches and the removal of same.
- 2.1.2.9 The supply of goods and services incidental to the conduct of burials and other matters relating to cemeteries;
- 2.1.2.10 The conduct of religious or other ceremonies of burial, disposition or commemoration;
- 2.1.2.11 The disposition and memorialisation of cremated human remains.

### **2.1.3 Burial Sites**

#### **2.1.3.1 Pre Purchase/Reservation of Burial Sites**

- 2.1.3.2 All remaining available burial sites at Penrith General Cemetery are to be allocated as “at need” only and next available.
- 2.1.3.3 The provision of pre-purchase of a burial plot at Penrith General Cemetery is only available to families of a deceased at time of burial. The family of a deceased can purchase (reserve) an adjoining plot, only if available.

### **2.1.4 Unpaid Reserved Sites**

- 2.1.4.1 Council reserves the right to rescind allocation if a site is unpaid for 6 months from the date of reservation. If the site is next to a family grave, the family will be contacted regarding whether or not they still want the site. Current burial site price applies at the time that payment is made.

### **2.1.5 Interment Right**

- 2.1.5.1 Council may grant an interment right in respect of a burial site in a cemetery.
- 2.1.5.2 A interment right may be granted to one or two or more persons as joint holders.
- 2.1.5.3 New interment rights are limited to a maximum of two interment rights per person. Proof of identity will be required.

- 2.1.5.4 Council will not grant an interment right to a person if the granting of the interment right will result in the person holding (including jointly holding) interment rights for more than two (2) burial sites/plots in the cemeteries administered by Council.
- 2.1.5.5 A interment right entitles the person or persons to whom it is granted an exclusive entitlement to inter or immure the remains of a deceased person in the burial site/plot in respect of which it is granted.
- 2.1.5.6 Council will issue to the owner of an interment right an “Interment Right Certificate” in relation to the burial site concerned.
- 2.1.5.7 A Certificate under this clause is to be in such form as the Council may from time to time determine.

## **2.1.6 Transfer of an Interment Right to person other than Council**

- 2.1.6.1 Council may on application, transfer an interment right from one or more persons to one or more persons as joint holders.
- 2.1.6.2 An application for the transfer of an interment right may only be made by the holder of the Interment Right concerned, or if the interment right is held by joint holders, by all of the joint holders.

If the original holder is deceased, the application may only be made by the Executor of the estate of the deceased holder or their authorised Legal Representative.

- 2.1.6.3 The transfer must state the name & address of the person/s to whom the interment right is to be transferred, and must include a copy of any relevant legal documents supporting the application, such as wills or letters of administration and must have the signature of a witness.

## **2.1.7 Transfer of Interment Right to Council**

- 2.1.7.1 Council may enter into arrangements with the holder of an interment right for the sale of the licence back to Council.
- 2.1.7.2 Purchase price to be offered for re-purchase of interment right is in accordance with the tables listed on page 15.

## **2.1.8 Grant of Interment Right may be refused;**

- 2.1.8.1 Council may refuse to grant or transfer an interment right to any person if, in the opinion of Council, the grant or transfer create a monopoly or encourage dealing in interment rights.

**2.1.9 Interment Right to pass to surviving holder**

2.1.9.1 On the death of a joint holder of an interment right, the remaining joint holder is, or joint holders are, entitled to the interment right.

**2.1.10 Interment Right may be bequeathed**

2.1.10.1 The holder of an interment right may bequeath the licence as if it were part of the holder's personal estate.

2.1.10.2 A person to whom an interment right devolves as a result of a bequest does not become the holder of the licence until the cemetery register is amended to indicate the fact.

2.1.10.3 An application under this clause must be in the form approved by Council.

**2.1.11 Burials in burial places in respect of which an Interment Right has been granted**

The remains of a deceased person may not be buried in a burial place in respect of which an interment right has been granted unless:

- a. The person was the holder of the licence immediately before he or she died, or the holder of the licence gives written consent to the person's remains being buried in the burial place, and
- b. Where another person is already buried in the burial place, the burial place has been dug to a depth to accommodate the remains of another person.

2.1.11.1 Once a burial has occurred in a burial place, the interment right devolves to the estate of the deceased whose remains were buried in the burial site/plot, except when there are joint holders.

2.1.11.2 The applicant for the burial shall be regarded as the person representing the estate of the deceased person whose remains are buried in the burial site/plot.

2.1.11.3 When there are two or more burials in a burial site/plot, the interment right will devolve to the estate of the last deceased person to be buried in the burial site/plot.

2.1.11.4 On the death of a spouse or a child of the holder of the interment right, the remains of the spouse or child may be buried in the burial site/plot to which the right relates without written consent of the holder of the interment right if Council is satisfied;

- a. That the holder is not available to give consent to the burial and

- b. That consent to the burial would be given if the holder were available, and
- c. Where another person is already buried in the burial site/plot, the burial site/plot has been dug to a depth to accommodate the remains of another deceased person.

## **2.1.12 Register of Interment Rights, Memorials, Cremated Remains and Interments**

- 2.1.12.1 It is a requirement Under the Public Health (Disposal of Bodies) Regulation 2012 - Part 8 and the NSW Cemeteries and Crematoria Act 2013, for council to maintain a register of Interment Rights, Memorials, Cremated remains and Interments for all cemeteries under care and control of council.
- 2.1.12.2 A register of reserved Interment Rights will be maintained by Council but no details of the holder of an Interment Right shall be made public.
- 2.1.12.3 The register will contain the name and address of the holder of the Interment Right granted in relation to the burial site.
- 2.1.12.4 Council will, immediately after a burial in a burial site, or placement of cremated remains in an ashes site, ensure the details of the deceased are entered in the register for that burial site or ashes site. Such details as name, age, last address, the date of death and interment date of the deceased who was interred will be included.
- 2.1.12.5 Council will keep a register of memorials erected in respect of interments sites in the cemetery.
- 2.1.12.6 The register may be wholly or partly in the form of a computer database, in documentary form or in another for prescribed by NSW Cemeteries and Crematoria regulations and is to contain such particulars as are required by the regulations.
- 2.1.12.7 Council may amend its register from time to time so as to remove any inaccuracies contained in it and to record any changes to Interment Rights as a result of transfer, revocation or death of the holder of an Interment Right.

## **2.1.13 Fees and Charges**

Fees and charges for core services, including plot and memorial reservations, interment and out of area charges are at cost recovery designed to match long term capital, operational and in perpetual maintenance liabilities and renewal financial needs.

- 2.1.13.1 An interment right transfer fee will apply upon application for each individual interment right transfer.

- 2.1.13.2 Memorialisation fees to be set at a level consistent with cost of service, associated infrastructure, and perpetual maintenance costs.
- 2.1.13.3 A 'conciierge' fee will apply for Council staff assisting funeral directors with burials and ashes placements and will be at a cost recovery rate per hour.
- 2.1.13.4 An out of area surcharge/non-resident fee will apply to the purchase/reservation of new burial sites if the person/s reside outside the Penrith Local Government Area boundaries.
- 'Out of Area' is classified as outside the local government boundaries of the Penrith Local Government Area. The charge applies to residents outside of these boundaries wanting to purchase a burial site in Penrith City Council cemeteries.
  - The 'out of area' surcharge does not apply if the owner/holder of the interment right or the deceased is a resident of Penrith Local Government Area. Address must be supplied. (Burial paperwork will be forwarded to owner's address.) Proof of residence of the deceased may be requested.
  - The 'out of area' surcharge does not apply if the deceased was a resident of a nursing home outside the city but their last address is in the Penrith Local Government Area. Proof of residency will be required.

#### **2.1.14 Requirements for Burial Sites**

- 2.1.14.1 The size of a burial site/plot in all operational cemeteries under care and control of Council shall be surveyed as being 1100mm long x 240mm wide (3'6"by8').
- 2.1.14.2 All burial sites/plots for the first interment of a coffin or casket shall be excavated to a depth of 1.8 metres/1800mm.
- 2.1.14.3 The second interment of a coffin or casket shall be placed so that it's upper surface is not less than 900mm below the natural service level of the soil where it is buried.
- 2.1.14.4 All burial sites/plots in the cemeteries will accommodate two coffins or caskets and up to four ashes containers. A separate fee shall apply for each burial interment or ashes placement.
- 2.1.14.5 The maximum permissible size of a coffin or casket for each burial site/plot shall be 762mm (30"), this includes any wrapping (Tapa cloth print wrapping) that is placed around the coffin or casket.
- 2.1.14.6 If the width of a coffin or casket exceeds 762mm (30") width, two burial plots must be purchased. Two interment fees will apply.



2.1.14.7 Funeral Directors must ensure sufficient staff is provided to lift and lower coffins or caskets.

2.1.14.8 A coffin/casket lowering device will be used in all Lawn Section burials in Penrith and St Marys Cemeteries.

2.1.14.9 Where subsidence is evident, Council will fill and compact ground on and around burial site/plot.

### **2.1.15 Orders for Burials**

2.1.15.1 Burials are not to take place except at such times as the Council may from time to time determine.

### **2.1.16 Restrictions on burial practices**

2.1.16.1 The following practices are not permitted in any cemetery under council's care and control:-

- a. Lowering of coffins by people other than trained funeral directors or Council's cemetery staff.
- b. Entering an open burial site, except in the process of an exhumation and only by cemetery staff.

### **2.1.17 Hours of Burials and Exhumations**

2.1.17.1 Burials and exhumations shall take place only during the hours approved by Council.

### **2.1.18 Booking a Burial Service**

2.1.18.1 A booking for a burial service can only be accepted from a Funeral Director.

2.1.18.2 A burial request confirmation form is to be completed by Council and faxed or emailed to the Funeral Director and Gravedigger.

2.1.18.3 Funeral Directors are required to;

- a. check details of burial service on the confirmation form are true and correct, indicate method of payment on the form,
- b. sign the confirmation form and email or fax back to Council Cemetery Operations.

2.1.18.4 An interment fee is payable upon each interment in the cemeteries.

- 2.1.18.5 A fee for burial permit does not apply for the burial of a child or baby under fifteen years.
- 2.1.18.6 The General Manager has the authority to waive cemetery fees for burial sites in cases of extreme hardship or extraordinary circumstances by up to 50% at time of need only.
- 2.1.18.7 Bookings must be made 48 hours prior to the desired date and time of the burial service requested.

## **2.1.19 Exhumations**

- 2.1.19.1 Exhumations are not to take place unless;
- a. Prior written consent has been obtained from the Director-General of the NSW Ministry of Health.
  - b. Council has issued an order for exhumation.
- 2.1.19.2 This clause does not apply if an exhumation has been ordered by a Court.
- 2.1.19.3 An exhumation shall be performed under the direction of NSW Department of Health staff. Council representative shall also be in attendance.
- 2.1.19.4 All cost incurred in carrying out an exhumation shall be paid by the applicant.

## **2.2 Memorialisation**

### **2.2.1 Columbarium Walls and Ashes Gardens**

- 2.2.1.1 Reservation of a site in the columbarium walls and ashes gardens may be pre-purchased for the placement of ash remains at a later date.
- 2.2.1.2 Upon payment, a “niche/garden site reservation certificate” will be forwarded to the niche/garden site holder.
- 2.2.1.3 If a niche or garden site is a paid reservation, the payment to be made when ashes are to be placed is the full current amount (which includes the cost of the niche or garden site, plaque, installation & permit) less the current cost of a niche or garden site.
- 2.2.1.4 Secure locked storage is available at Council for ashes until placement is required.
- 2.2.1.5 Standard ash container given to the family from crematoriums are to be placed in the walls and garden sites, wooden boxes and ceramic urns will not fit in niches or gardens sites.

- 2.2.1.6 Ashes are placed by Council staff. Families and loved ones can be present at the time of placement.
- 2.2.1.7 Ashes may be removed from the walls or gardens after prior approval from Council and by Council staff only.
- 2.2.1.8 All columbaria and ashes garden plaques are supplied by Penrith City Council.
- 2.2.1.9 Two persons can be memorialised on each plaque but only one ashes container can be placed in each niche or garden site.
- 2.2.1.10 Memorialisation can also occur when there are no ashes to be placed.
- 2.2.1.11 No vases, glass jars or objects are to be placed at the base of the memorial walls. Items are not to be glued to the plaques or memorial walls.
- 2.2.1.12 Spiked vases are to be used in the ashes gardens. No plants or objects are to be placed on the garden sites.

## **2.2.2 Monuments, Structures or landscaping.**

- 2.2.2.1 Monumental and memorial work in Penrith City Council cemeteries must conform to certain standards, is constructed from materials and erected in a manner that:
1. Does not present a risk to members of the public and staff;
  2. Is acceptable to the environment; and
  3. Maintains appropriate aesthetic standards.
- 2.2.2.2 A Monument means any structure, plaque, headstone, masonry, metal work, casting or item placed over, in or around a burial site.
- 2.2.2.3 An application form to erect a headstone, monument or kerb is to be completed and submitted to Council, for approval to do works in the cemetery. The current fee payable for monument/headstone payments must be provided with the application form.
- 2.2.2.4 The applicant must adhere to all the conditions set out in the application form.
- 2.2.2.5 The application form must be signed by the owner/grantee of the interment right.
- 2.2.2.6 A Monumental Permit, permit will be issued by Council on approval of application to erect a headstone, monument or kerb. Issue of the permit is at the discretion of Council.

- 2.2.2.7 Work must not commence until confirmation/approval by letter (work permit) from Council is received by the applicant.
- 2.2.2.8 The monumental permit must be carried by the monumental mason at all times whilst in the cemeteries.
- 2.2.2.9 The applicant must contact Council, giving 36 hours notice for suitable appointment for a site visit. This visit will confirm the site and the nature of the work to be carried out.
- 2.2.2.10 Monuments are to be no longer the 2440mm and 1100mm wide.
- 2.2.2.11 Monumental Lawn Section headstone monuments must be no higher than one metre in height (measured from ground level), one metre in length and a maximum of 400mm in width.
- 2.2.2.12 The ownership right of monuments or other structures is deemed to be with the person or persons of the interment right who authorised the monument, structure or plant to be constructed.
- 2.2.2.13 Council shall not be responsible for the upkeep, maintenance, repair etc.of any monument, structure or landscaping on burial sites/plots.
- 2.2.2.14 The owner of the interment right is responsible for the upkeep, maintenance and repair of any monument, structure or landscaping on the burial site.
- 2.2.2.15 Council shall not be held liable for any damage to headstones or monuments that may be caused by normal wear and tear or other parties.
- 2.2.3 Plaques**
- 2.2.3.1 Memorial plaques for lawn sections, columbarium walls and memorial gardens will be ordered through council.
- 2.2.3.2 All plaques for lawn sections, columbarium walls, memorial gardens and other memorialisation options must be of the size, design and approved type as specified by Council.
- 2.2.4 Permitted Works in Council Cemeteries**
- 2.2.4.1 All persons wanting to carry out work on a grave/burial site in a cemetery under care and control of Penrith City Council must have written approval prior to commencement of any works.
- 2.2.4.2 Council reserves the right to remove, demolish or alter, or require the removal, demolition or alteration of any structure that is not approved.
- 2.2.4.3 All temporary structure requests for gravesites need to be submitted in writing to Council in for approval. No work is to commence on a gravesite without prior approval by council.

- 2.2.4.4 Only appropriately insured and approved organisations/individuals can undertake work in Council cemeteries, including Funeral Directors, Monumental Masons and other contractors.
- 2.2.4.5 The level of public liability insurance and professional indemnity insurance required be that recommended by Council's WH&S Officer from time to time.
- 2.2.4.6 When working in council cemeteries, providers are not considered to be employees of Council. Works undertaken must be completed with adherence to the NSW Work, Health & Safety Act 2011 which protects the health, safety and welfare of all workers and others in relation to NSW workplaces and work activities.
- 2.2.4.7 All monuments/headstones are to be conducted to Australian Standards 4204, Monuments and Headstones in Cemeteries. Footings and piers as per AS4204 are required on each monument (if an individual cannot construct a permanent monument to this standard, then that individual will not be permitted to do so). All work must be conducted in a professional, safe and tradesperson like manner.

## **2.2.5 Miscellaneous**

- 2.2.5.1 A person must not do any of the following within cemeteries under care and control of Penrith City Council;
- a. Damage, deface, interfere with or alter burial places;
  - b. Damage, deface, interfere with or alter monuments;
  - c. Bury, inter or exhume any human remains, whether cremated or not;
  - d. Use the cemetery for recreational use or recreational activities including any ball games, riding of bicycles, skate boards, rollerblades, use of frisbees, picnics or BBQ's;
  - e. Playing of loud music;
  - f. Have any large gatherings in the cemetery other than a burial service;
  - g. Visitors wanting to have a large gathering in the cemetery must obtain approval from Council cemetery operations;
  - h. Bring any animals into the cemetery;
  - i. Enter or remain in the Cemetery at night, between the hours of sunset and 6.00am;

- j. Possess or drink an alcoholic or intoxicating beverage;
- k. Drive a vehicle at a speed or more than 10 kms per hour;
- l. Distribute any circulars, advertisements, paper drawn or photographic;
- m. material without prior Council consent;
- n. Bring or leave any rubbish, refuse, scrap metal (including remains of vehicles), rock, soil, sand, or any other substance;
- o. Engage in trade or commerce without Council's written consent;
- p. Plant any tree, shrub, herbage or any other plant without prior council approval;
- q. Camp or reside on any Cemetery land;
- r. Bury a pet.

## **2.2.6 Removal of Trespassers**

- 2.2.6.1 Council may remove any person trespassing or causing annoyance, interference or nuisance or otherwise committing a breach of this policy.

**Table 1**  
**Percentage of current Purchase Price to be offered**  
**for re-purchase of an interment right (grave site)**

	Easily accessible grave dug by machine	Somewhat accessible grave dug possibly by machine	Not easily accessible Grave dug by hand
High Demand Primary burial area	70%	60%	50%
High Demand Secondary burial area	60%	50%	40%
Low demand primary burial area	50%	40%	30%
Low demand secondary burial area	40%	30%	20%

**Table 2**  
**Examples of Sections in relation to purchase price to be offered**

	Easily accessible grave dug by machine	Somewhat accessible grave dug possibly by machine	Not easily accessible grave dug by hand
High demand Primary burial area Eg. Penrith Lawn 1, 2, & 4, St Marys Lawn 2, Catholic, Greek Orthodox, Coptic Orthodox	<ul style="list-style-type: none"> <li>• Newest rows in which most recent burials are occurring</li> <li>• All Lawn sites</li> </ul>	<ul style="list-style-type: none"> <li>• Rows adjacent to rows in which most recent burials are occurring</li> </ul>	<ul style="list-style-type: none"> <li>• Rows well inside in which most recent burials are occurring</li> </ul>
High demand secondary burial area Eg. Penrith Lawn 1, & older catholic St Marys Lawn & older catholic Emu Plains Anglican	<ul style="list-style-type: none"> <li>• All Lawn sites</li> <li>• Outside rows, graves adjacent to roadways etc</li> </ul>	<ul style="list-style-type: none"> <li>• Rows adjacent to rows in which most recent burials are occurring</li> </ul>	<ul style="list-style-type: none"> <li>• Rows well inside in which most recent burials are occurring</li> </ul>
Low demand primary burial area Eg. St Marys Lutheran, Penrith Presbyterian and Uniting	<ul style="list-style-type: none"> <li>• Outside rows, graves adjacent to roadway etc</li> </ul>	<ul style="list-style-type: none"> <li>• Rows adjacent to rows in which most recent burials are occurring</li> </ul>	<ul style="list-style-type: none"> <li>• Rows will inside in which most recent burials are occurring</li> </ul>
Low demand secondary burial area Eg. Penrith Anglican	<ul style="list-style-type: none"> <li>• Outside rows, graves adjacent to roadways etc</li> </ul>	<ul style="list-style-type: none"> <li>• Rows adjacent to rows in which most recent burials are occurring</li> </ul>	<ul style="list-style-type: none"> <li>• Rows well inside in which most recent burials are occurring</li> </ul>