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By post and by email

ATTENTION OF Miriam Baptist, Case Officer
Development Management
Camden Town Hall
Judd Street
WC1H 9JE

24th March 2025

Dear Miriam Baptist,

**Re: Objection Statement to Planning Application 2024/5407
Highgate Cemetery Swain's Lane London N6 6PJ**

I am writing about the above application. As a grave owner on the Mound, my comments will mostly relate to the Gardeners' Building proposed in the East Cemetery next to the Mound.

As grave owners, we were not consulted at any stage of the development process for these proposals, nor were we made aware of the application being lodged with the Council or included in the statutory consultation carried out by the Council. There were no notices close to the Mound. A few days ago another grave owner made me aware of the application, hence my comments at this late stage of the process.

The grave owners should have been treated as critical stakeholders and people with interest in the Cemetery by all parties i.e. the Trust, their Consultants and the Council. They should have been consulted and their views and concerns should have been taken into account at every stage of the development of the proposals. I would further suggest that the project teams should have included representatives of the grave owners from both cemeteries throughout the process to ensure their input and involvement.

I would strongly suggest that all grave owners at the Mound and nearby are now properly informed of the proposals, and their views are sought. They should have adequate time to consider the proposals well before any decision is considered by the Council.

As a grave owner, I would welcome proposals to conserve, enhance, and care for the landscape and heritage of the Highgate Cemetery. However, I have very serious concerns regarding some proposals included in the application. I object in the strongest terms to the proposed Gardener's Building. The location and the design of the building, including its scale and height, are inappropriate and unacceptable. Below, further detailed comments to support objections are given under three headings: i) The impact of the proposals on the open character of the East Cemetery, ii) The impact of the proposals on the Mound, and iii) The impacts of the design of the proposed Gardeners' Building.

These comments and objections are drafted without the benefit of seeing all the relevant information relating to the application and without the benefit of the views and comments of the grave owners on the Mound. I would like to have the opportunity to submit further comments and objections when such information becomes available for my / grave owners consideration.

i) The impact of the proposals on the open character of the East Cemetery

As a grave owner I consider the following impacts unacceptable, and object to them strongly.

In the Draft Camden Local Plan January 2024 Highgate Cemetery/Waterlow Park area is identified as a designated Metropolitan Open Land (MOP), one of four MOPs in Camden. The Plan states that "We will protect the openness and character of these spaces". Under Policy NE1- Natural Environment the Council

will “Give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL)”. The current proposals for the Gardeners’ Building are contrary to these policies.

During the PPA consultation process, Camden officers and later the Camden Design Panel raised concerns about the proposals, including the Gardener’s Building, at every stage of their discussions. The CDP’s comments as they are reported in The Design & Access Statement Volume 3 (p.) are quoted below:

- “The new buildings impact on cemetery landscape ... to minimize their impact on the cemetery’s openness.”
- “Further thinking is needed on how the (Gardeners’) building’s impact on the openness of the East Cemetery can be minimised”.

The current proposals for the Gardeners’ Building fail to address the CDP’s clearly stated concerns. The CDPs full comments are not currently available and should be made available for our consideration.

The overwhelming character of the East Cemetery is its undisrupted views and flowing landscape, which continue from/to Waterloo Park to its North. Unlike the West Cemetery, it hardly has any buildings and/or historic or otherwise structures other than those around its entrance. The Gardeners Building, as proposed, will substantially impact the open character of the East Cemetery and will diminish its overwhelmingly open character.

Karl Marx’s tomb is a major landmark, and one of the most visited sites in the East Cemetery. The proposed Gardeners’ Building will become an imposing background view for this significant site, and it will substantially impact its setting. In addition Tomb often have large number of visitors. The inevitable movement of machinery and vehicles through and near this most visited part of the cemetery will be very disruptive, even potentially risky as the ‘roads’ are narrow shared pathways primarily for pedestrians (no ‘pavements’ as such anywhere) throughout the cemetery often lined up with graves on both sides.

These paths are also completely unsuitable to take large vehicles and machinery that may well be needed during the construction period of the proposed Gardener’s Building, likely to be quite an extended period not least because the Mound is a filled area and will require substantial work to stabilise it before any building works. Further the site is in the middle of the cemetery and away from both of entrances to the cemetery with the result that any construction traffic will have a huge unacceptable impact on visitors and grave owners alike, not withstanding the noise and hive of construction activity completely destroying any peace and quiet expected in a Cemetery setting for a long period.

The Highgate Cemetery’s original design did not accidentally locate the buildings for the cemetery’s day-to-day functions near the entrances. This approach resulted in keeping the cemetery free from utilitarian structures to provide visual openness and connection. The new building proposals for the West Cemetery seem to be consistent with this original design intent. However, this principal idea has been abandoned and ignored in the East Cemetery by proposing an imposing Gardener’s building along a prominent path and in the middle of graves. This is not acceptable.

It is clear to me that the Mound is not the right location for the Gardeners’ Building. The gardeners accommodation should not be moved from its current location close to the entrance which is the right location for it. It is not possible to understand the logic of moving a necessary accommodation for the cemetery to an unsuitable problematic unacceptable location to make way for a “good to have” use.

ii) The impact of the proposals on the Mound

As a grave owner I consider the following impacts unacceptable, and object to them strongly.

As grave owners at the Mound, we visit with our families, enjoy the open nature of the place, enjoy the light, and contemplate in privacy. It is unimaginable to lose this feeling of being in nature and enjoying the peace and serenity of the place when we visit our loved ones.

The level of activity created in and around the Gardeners’ building, particularly the concentration of activity relating to machinery, tools, workshops, and facilities for gardeners, would destroy all the peace and serenity that one expects in a cemetery setting. For the Mound, part of East Cemetery with probably the largest number of recent burials in one place, this will have a huge impact and is not acceptable. The impacts during

the construction period outlined above would be even much much greater destroying any peace and serenity for an extended period for grave owners and visitors alike.

The proposed Gardeners' Building will disconnect the Mound (a recent addition to the cemetery) from the rest. The Mound would be hemmed in between the proposed Gardeners' Building and the existing Whittington Estate buildings immediately beyond the boundary to its south and east effectively isolating it from the rest of the East Cemetery.

The Design & Access Statement Volume 3 states that "The Mound location was confirmed as an area suitably remote which could be maximized to accommodate all the gardening facilities." (p.12) "This embankment was identified as an area requiring stabilisation making it a suitable location for a new facility to assist the Cemetery's operations team." (p.70). It is hard to believe that such unrelated, arbitrary and incorrect bases are used to locate the Gardeners' Building to the detriment of the open character of the East Cemetery and in ignorance of the impact on the Mound, the grave owners, the visitors and the surrounding area. Please also note Camden Design Panels comments that "It cannot comment on whether the best locations have been chosen" (p.38).

I'm also concerned that the Gardeners' Building may have a significant impact on ground water levels at the Mound and the surrounding area to the detriment of the graves therein as well as landscaping.

The Mound recently lost an area of landscaping to newly created graves, which was unfortunate. What the Mound needs is an enhanced landscape to match the rest of the East Cemetery, including to the earth bank and its boundaries integrating this recent and well used area by families and grave owners better to the East Cemetery, and certainly not to become a backyard hemmed in by buildings.

iii) **The Design of the Proposed Gardeners' Building**

As a grave owner I consider the following impacts unacceptable, and object to them strongly.

The proposed Gardeners' Building is a substantial utilitarian building proposed for a prominent site. It is 25m long almost 5m deep and over 7m high. Elevated walkways and stairs with railings at ends of building further increase the footprint.

The submitted drawings do not adequately show the visual impact of the building. I suggest that photomontages showing the proposed building are produced and made available from various viewpoints; as a minimum from the Mound looking west, from the entrance of the Mound looking south-west, from Marx's Tomb looking south, and from East Cemetery looking towards the Mound. Photos attached on pages 5 & 6 below indicate such viewpoints.

On the path/road side full height railings/shutters on the ground floor and full height windows on the 1st floor exacerbate its visual impact and is overwhelmingly out of proportion. On the Mound side visual impact of a full floor high blank wall is far too imposing. It will cast a shadow over the western half of the Mound for most of the day and for most of the year. Again photomontages would help to demonstrate this impact. Entering the first-floor offices and mess room from the level of the graves will generate unrelated disruptive pedestrian traffic around this sacred area.

The proposed Gardeners' Building will generate unacceptable levels of vehicular and pedestrian traffic both during construction and while in use and irrevocably destroy the serenity of the cemetery setting. It will be very disruptive to pedestrians while vehicles enter and exit the building as the path/road in front is especially narrow at this point.

The Mound is probably the most visited part of the Highgate Cemetery by the grave owners and their families, since it is new the burials are recent and memories are fresh. It is almost impossible to understand and accept the insensitivity of the design and the decision to propose this insensitive and out-of-proportion utilitarian building at this location.

The Gardeners' Building fails the designers proposed concept of following the principle of an English garden wall, with its scale, height and its elevation of garage doors and substantial windows, and is not appropriate

to meet the “challenge of ... contextually sensitive location”. If a retaining wall is required at the Mound for stability of the ground then the principle of a English garden wall may be a possible solution but no higher than the ground level at the Mound, and certainly not a substantial building pretending to be wall.

The path from Marx’ Tomb towards the Mound and beyond is narrow and is well used by visitors, and the pedestrians mount the spaces between graves to its west to allow very occasional passing vehicle. All such paths within the cemetery are designed primarily for pedestrians and are not roads as such, introducing more vehicular traffic onto these narrow paths will impact the visitors at this well visited popular destination.

I strongly believe that the Gardeners’ accommodation requirements can be / should be provided at its current location near the entrance to the East Cemetery with a sensitive approach to its design. If “the building fabric is beyond its design life” and has “a poorly performing fabric” as stated in The Design & Access Statement Volume 3 (p.79-80) these should be addressed at its current location and not elsewhere where its impacts on East Cemetery, the Mound, the visitors and the grave owners are not acceptable.

I note that plans in The Design & Access Statement Volume 3 shows a large strip of land along the Stoneleigh Terrace as an Indicative Maintenance and Skip location. This strip is larger than the site next to the Mound, and has a dedicated access path. It is also close to one of the entrances to the East Cemetery for easy access. It is overlooked by garages at the back and the basement level of Stoneleigh Terrace block. Please see Images 5 & 6 on page 7 attached. It therefore has the potential to accommodate single-storey facilities for machinery, a tool store and a workshop to complement the gardeners’ accommodation at its existing site by the entrance, the building updated / rebuilt as necessary. The garages looked unutilised, though this needs to be confirmed they may be suitable to accommodate tool store, workshop and similar avoiding the need for new structures. There is already a similar use at the western end of the garages. And a vehicles compound can be created along the strip of open land between the graves and the garages. This approach would have a minimal impact on the landscape and open character of the East Cemetery, the visitors and the Mound and the grave owners.

Yours sincerely,

Emel Teymur

Encl. The photos indicating possible viewpoints for photomontages, and area along Stoneleigh Terrace

Photos indicating possible viewpoints for photomontages, and area along Stoneleigh Terrace:

Image 1 - View from Marx's grave towards the Mound



Image 2 - View from just past the Marx's Tomb



Image 3 - View from the Mound looking west

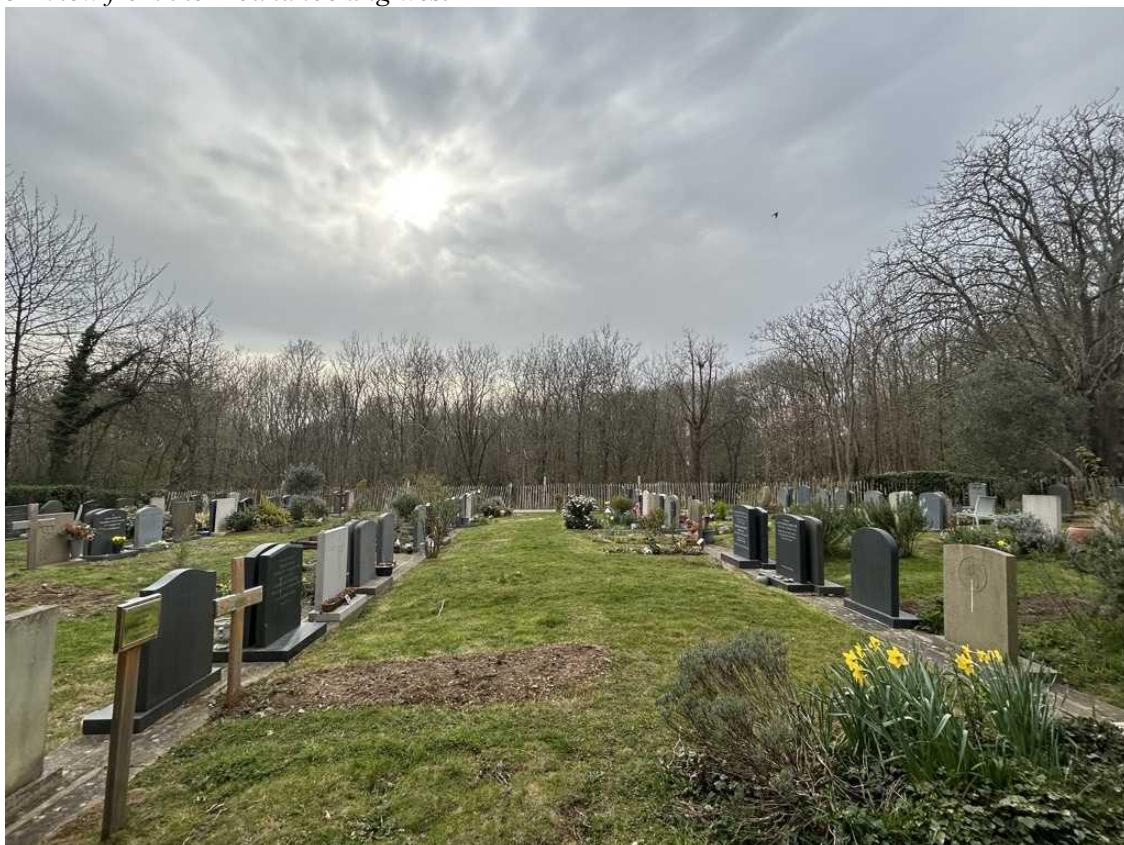


Image 4 - View from the East Cemetery looking east towards the Mound



Image 5 – Current skip and maintainance area southern edge of the East Cemetery

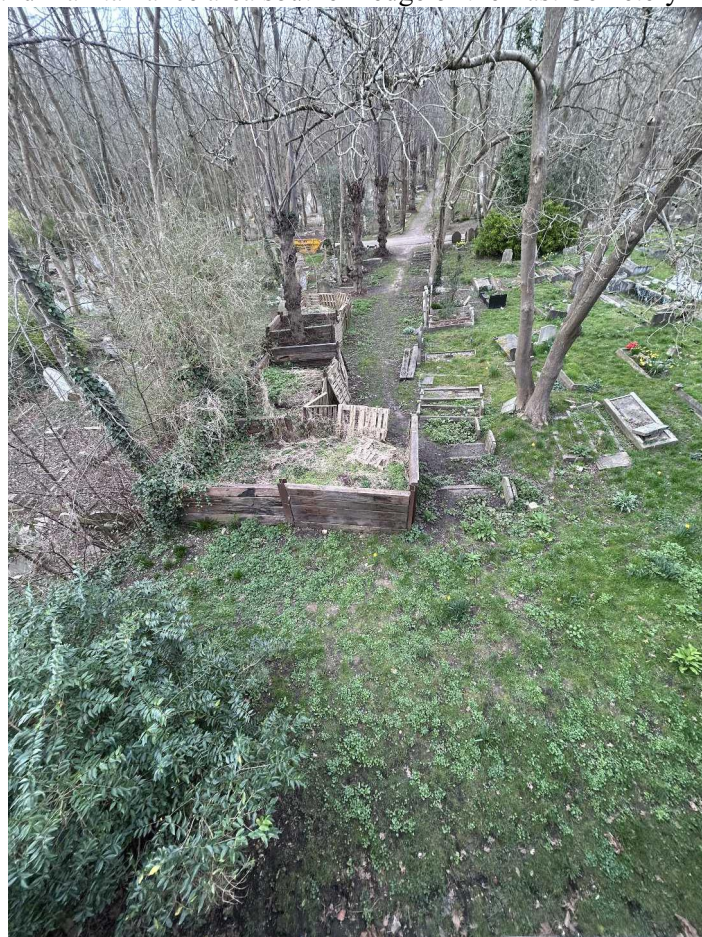


Image 6 – Area adjoining skip area southern edge of the cemetery next to the garages at Stoneleigh Terrace block

