



Historic England

Ms Miriam Baptist

Direct Dial: [REDACTED]

London Borough of Camden

Development Management

Our ref: L01585910

Town Hall, Judd Street

London

WC1H 9JE

19 February 2025

Dear Ms Baptist

**Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HIGHGATE CEMETERY SWAIN'S LANE LONDON N6 6PJ
Application Nos 2024/5423/L & 2024/5407/P**

Thank you for your letters of 5 December 2024 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Historic England Advice

Summary

Historic England recognises the high significance of Highgate Cemetery, which is a remarkable 19th century funerary landscape containing buildings, structures and burials of great archaeological, architectural and historic interest.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Tel [REDACTED]
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



We acknowledge the issues that the cemetery is experiencing in relation to the condition and accessibility of the landscape and many of the buildings within it and the need to provide a sustainable long-term future. We were involved in pre-application discussions alongside the local authority in relation to these proposals and are pleased that many of our comments have been taken on board in this final submission.

In principle, we support these proposals, which seek to enable and sustain the cemetery's continued use for burial and commemoration and as a visitor attraction.

We will be providing separate comments on archaeology following the receipt of further information relating to tree planting, as set out below.

Significance

Highgate Cemetery was founded in 1836 to designs by David Ramsay in a romantic style. The West Cemetery followed garden cemetery principles emulating Paris's Père Lachaise, being laid out as a series of serpentine carriage drives and paths leading uphill towards the Lebanon Circle and St. Michael's Church, with numerous designed views out looking towards London.

James Bunstone Bunning designed many of the buildings and structures that formed the key features of the cemetery design, including the Egyptian Avenue and Lebanon Circle (grade I), the catacombs and terrace (grade II*), the chapels (grade II) and the colonnade on the west side of the entrance forecourt (grade II).

The East Cemetery provided an extension in 1843 and is more formal in nature, being laid out to a rectilinear design.

The cemetery contains a large number of memorials, many of which are listed. These include the tomb of Karl Marx (grade I) and the listed mausoleum of Julius Beer (grade II*). Due to the national, and indeed international, significance as an early and influential cemetery design and one of London's 'Magnificent 7' Victorian cemeteries, Highgate Cemetery is designated at grade I as a Registered Park and Garden.

The cemetery is located within the Highgate Conservation Area and adjacent to other designated heritage assets including Waterlow Park (grade II*) and the John Winter House (grade II*). It is also within the Tier 2 Archaeological Priority Area of Post Medieval Cemeteries, as defined in the Camden Local Plan.

The current estimates are of 250,000 graves within the cemetery, containing an average of 4 burials each. This assemblage is considered to be of very high significance due to its evidential, communal and historical values. This significance is moderate-high for individual identifiable burials and moderate-high for individual un-



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



identifiable burials. These assessments apply to both human remains and associated funerary materials such as coffins or burial structures.

Background

Following decades of deterioration and the cemetery's closure in 1975 it was acquired by the Friends of Highgate Cemetery in 1981, which are a charitable trust. In 2009, the cemetery was placed on the Heritage at Risk Register. Following an extensive campaign of works, partly funded by Historic England, the landscape and the at-risk monuments within the cemetery were removed from the register in 2012.

The cemetery is both a working cemetery and popular visitor attraction, drawing in around 100,000 visitors per year, including children on educational visits. The cemetery has a permanent staff, but also relies heavily on volunteers to help manage the landscape.

We understand that the existing facilities provided at the cemetery for visitors and staff are constrained. They do not meet the needs or aspirations of the Friends, who want to enhance the visitor experience and provide better facilities for visitors, mourners, staff and volunteers. It is expected that visitor numbers will increase over time and burial numbers will rise as a result of the recent Highgate Cemetery Act 2022, which enables well-managed grave reuse.

Comprehensive tree surveys, monument condition surveys, building surveys and a Conservation Management Plan (CMP) have been compiled in recent years. These documents have established the need for major investment as the cemetery has problems with poor drainage, worn surface finishes, lack of accessibility to all users, ageing and poor-quality tree stock, and loss of historic designed vistas towards London. Many of the historic buildings and monuments within the cemetery are fragile in nature and are in need maintenance and repair.

Impact

The application proposals seek to address many of the issues identified above in relation to the cemetery landscape, as well as providing enhanced facilities for staff, volunteers, visitors and people attending burials. It includes various strands of work affecting the landscape, existing buildings within the landscape, and provision of four new buildings, as follows:

a) Re-landscaping works at the main entrances to the cemetery on Swains Lane.

This is the main point of arrival to both the West and East Cemeteries and is marked by the cemetery chapels. These are set back from Swains Lane behind an elliptical



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA


HistoricEngland.org.uk



courtyard. At present, this area is dominated by parking and through traffic and is not an easy environment for pedestrians to navigate.

Proposals include the re-landscaping of the public realm in order to reduce traffic speeds and prioritise pedestrian movement. The works include changes to surface finishes, creating a raised table within the carriageway alongside widening of the pavement on the east side of Swains Lane, realigning the 20th century cemetery railings at the entrance to the East Cemetery to create a larger pedestrian area onto Swains Lane, rationalising vehicle/cycle parking and re-introducing formal shrub planting in front of the cemetery chapels.

These aspects of the proposed development would enhance the significance and setting of the cemetery as experienced from Swains Lane and the significance of the cemetery chapels.

b) Installation of new drainage systems across the cemetery and renewal of pathway finishes.

At present, the cemetery has no working land drainage system, meaning that water run-off is not managed. This has a serious impact on the accessibility of the cemetery, particularly following periods of heavy rainfall where existing pathways (many of which are steeply inclined) become muddy or eroded, while areas of ponding are potentially undermining the stability of monuments and affecting trees. These issues are anticipated to increase with the effects of climate change.

The proposals are to replace the existing primary hard surfaced pathways with new hard surfacing that would include restoration of historic drainage channels wherever possible. These pathways would be finished in concrete with aggregates to produce a light surface finish that would be visually similar to a bound gravel finish and direct surface run-off to restored and/or reinstated drainage gullies. On secondary pathways, the surface finish would be a light-coloured gravel that would enable natural drainage to new soakaways installed underneath, while other pathways may be resurfaced or drainage introduced, where necessary. Overall, these proposals should integrate with the landscape and lead to physical enhancements to pathways and drainage within the cemetery.

We note that issues with soil displacement have yet to be resolved. There is likely to be a large volume of soil arising from construction activity and ongoing tree planting measures (as well as future burials) that will need to be accommodated either off site or on site.

c) Tree removal and tree planting.

The Ash-dominated secondary woodland, established across the cemetery since its



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



decline in the mid-20th century, has seen little active tree management in recent decades beyond immediate health and safety issues. This has led to the cemetery having dense tree coverage with limited species diversity and poor understorey vegetation. The existing condition of the trees frequently impacts on the monuments and buildings within the cemetery, by creating a damp microclimate, causing subsidence, push and direct damage through leaf and branch fall.

The existing dense tree cover is contrary to the original design of the garden cemetery landscape. This was intended to have a rich variety of tree species and to provide areas of openness that allowed views across the cemetery and towards the centre of London, particularly from elevated positions within the West Cemetery. Recent tree survey work has revealed that many of the cemetery's trees are in poor condition towards the end of their natural lives. The majority of the self-seeded Ash trees are now affected by Chalara Ash dieback.

The proposals are to actively manage the trees within the cemetery. This includes the removal of Ash trees and other poor-quality specimens that are causing harm to buildings and monuments or obscuring designed views. The proposals involve extensive new tree planting (c300 in number across the entire cemetery) with resilient species that will withstand the potential effects of climate change and increase biodiversity, as well as enhance the cemetery's intended ornamental character. We understand from our recent site meeting that the new trees would be positioned with regard to existing memorials and historic views and in locations avoiding active burials. However, further information is required setting out the tree planting strategy in relation to burials and memorials.

The removal of trees and subsequent tree planting is likely to have a transformative impact on the character of the cemetery landscape. Some areas will change from dense Ash-dominated tree cover to more structurally diverse and species-rich woodland with understorey planting and some relatively open and sunny locations. Views will also be reopened towards London and there will be increased visibility of the urban townscape beyond the cemetery.

In heritage terms, the proposals are in line with the original design intentions for the cemetery and reflect the recommendations of the CMP, while the reopening of long views could provide a significant point of interest and enhancement to the visitor experience. However, it is acknowledged that the established character of the cemetery as a place of enclosure and predominantly dense woodland would change.

d) Landscape management and site furniture

The proposals include localised widening of existing paths at two locations - on the West Carriage Drive close to the Swain's Lane entrance in the West Cemetery and near the Chester Road Gate in the East Cemetery. These would provide new



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



dedicated set-down areas for skips and associated landscape maintenance uses.

A former path in the north of the western cemetery would be reinstated to provide a step-free route to the upper terrace. To avoid impacts to trees and graves, this would take the form of a raised timber boardwalk on piles. At the same time, a number of existing steps would receive new metal handrails to improve accessibility. Additional seating would be provided by introducing new reproduction heritage-style benches where space allows at locations between existing monuments set back from the edge of main paths.

These aspects of the proposals would represent new interventions within the cemetery but would match existing materials and finishes or otherwise adopt new historically appropriate designs. They would contribute to the wider benefits of improved accessibility and rationalised operations and maintenance.

e) Works to funerary monuments and structures

The works of repair to funerary monuments and structures are proposed to be carried out in a like for like manner and are likely to have a positive impact on the condition and presentation of those structures. In a limited number of cases, alterations to listed structures are also proposed, as follows:

The Egyptian Avenue (Grade I)

The proposals include the reinstatement of the left-hand obelisk head from the lower portal of the Egyptian Avenue. The loss of the left-hand obelisk is believed to date from the mid-20th century, likely as a result of neglect and decline during that period. This proposal would improve the architectural legibility of the intended approach and entrance to the avenue and the Circle of Lebanon, thereby reinstating a greater sense of arrival and enhancing the significance of this heritage asset. We recognise this as one of the few exceptions to the prevailing conservation ethos guiding works at Highgate.

The Circle of Lebanon (Grade I)

The proposed works include the removal of the ad-hoc accumulation of unsightly grills and vents, likely inserted into the walls of tombs in the 20th century. These works would enhance the overall architectural experience of the Circle of Lebanon.

Cutting Catacombs

The proposal entails repainting all tomb gates and doors to an "authentic colour." We recognise that paint analysis would be unlikely to yield any results due to the nature of restoration works carried out in 2001 and that detailed research will be necessary to



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone ()
HistoricEngland.org.uk



inform the new paint scheme.

e) Re-landscaping of the courtyard to the West Cemetery, creation of new visitor facilities, meeting spaces, WCs and staff offices.

At present, the cemetery chapels and colonnade enclose a courtyard that forms the main point of arrival to the Western Cemetery. The level of the courtyard was raised in the 20th century and this has resulted in a stepped access arrangement through the chapel entrance arch. The existing visitor, staff and volunteer facilities are clustered within this area and include:

The chapels, listed at grade II, comprising the Anglican Chapel, which is currently set out as a meeting room and function space, and the Dissenters Chapel, which is currently used as office space and staff facilities. These chapels have been subject to alterations in the 20th century that have included the removal of external decorative features including the central cupola and finials and the subdivision of the interior of the Dissenters Chapel. These works have had a harmful impact on their significance and has undermined and muted the grand scale and sense of arrival to the West Cemetery, as intended by the architect.

Modern WC block of utilitarian design.

The East Lodge, listed at grade II, which is currently used as a volunteer's hub.

A series of shipping containers providing storage for gardeners' equipment and vehicles, located adjacent to the west access road. These containers are utilitarian in design and have a harmful impact on the significance of the landscape and on the setting of nearby memorials.

The proposals comprise:

Lowering the courtyard to its original level. This would negate the need for steps to access the courtyard but would require additional steps/ramps to be installed to access the chapels.

Repair of the chapels, reinstatement of lost pinnacles and cupola at roof level and removal of modern fabric from the Dissenters Chapel. The chapels would be used as flexible meeting or events spaces and to tell the story of the history of the cemetery.

Removal of shipping containers and erection of a new 'Visitor and Operations' building on the west side of the colonnade.

Removal of the existing WC block and erection of a new store building.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



Repair of the East Lodge and conversion to provide WC facilities.

The proposed work to the chapels is likely to enhance their significance.

The proposed works to East Lodge, removal of the existing modern structures, and installation of a new store are unlikely to have a significant impact on the landscape or other designated heritage assets.

The proposed new Visitor and Operations building would sit adjacent to the colonnade. Its design references the height, scale, rhythm, colouration and solidity of that historic structure. Where the building fronts onto the courtyard it would be single storey and would contain the public-focused activities, including ticketing and a café. As the building turns the corner onto the west access road, it would tuck into the rising slope of the land and would contain two storeys of accommodation with space for volunteers at the lower level and office facilities at the upper level.

The Visitor and Operations building has evolved during pre-application discussions. It has been much reduced from its original scale and has been subject to significant design changes to reduce its impact on the landscape and setting of nearby designated heritage assets. We understand that the proposed building provides the minimum dimensions necessary to meet the projected future needs of the cemetery.

e) New buildings within wider landscape

Two further new buildings are proposed within the cemetery, including a new Community and Education Building that would enhance the cemetery's offer to the wider community, and a new Gardener's Building that would provide space for storage of vehicles and mess accommodation.

The proposed Community and Education Building would replace the existing modern building containing gardener's accommodation and WCs, located in the East Cemetery, adjacent to Swains Lane. While being situated away from the designed vistas looking across the cemetery, this is an area of relatively high heritage significance, given its proximity to the main entrances and active burials. The existing building is of a utilitarian design and is arranged over ground and basement levels. It incorporates part of the historic tunnel that formerly connected the East and West Cemeteries.

The proposed building would be arranged over ground and basement levels and is of a similar footprint to the existing building. It has a modern design, taking inspiration from the architecture of the surrounding cemetery, and is proposed to be faced in reconstituted stone with a pyramidal roof and projecting pod structures. Internally, the building addresses and reveals the historic tunnel structure with a two storey lightwell.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



A gate within the adjacent cemetery boundary wall is proposed to provide direct access onto Swains lane and enable out of hours use.

The proposed design of the Community and Education Building has evolved extensively during pre-application discussions resulting in reductions in scale and design changes that have sought to reflect the architectural character of the surrounding cemetery memorials. Due to its height and distinctive roof form, the proposed building is likely to be visible and eye catching in views along Swains Lane looking towards the cemetery chapels and would be visible from some parts of the East Cemetery.

The proposed Gardener's Building would be located on the eastern side of the East Cemetery. It would be faced in brickwork with areas of green wall/roof and arranged over two levels: the ground floor providing storage for vehicles and the upper level containing gardener's mess accommodation.

This is an area of the cemetery landscape that is of relatively low heritage significance, being located away from designed vistas and already partly banked up to accommodate modern burials. However, there is likely to be some visual relationship between the grade I listed Karl Marx memorial. The design has therefore been subject to a number of iterations at pre-application stage in order to reduce the volume and presence of this building in views across the cemetery.

Policy

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the obligation on local planning authorities to pay special regard to preserving the special interest of listed buildings and their settings, and special attention to preserving or enhancing the character or appearance of conservation areas.

The London Plan 2021 provides the spatial development strategy for Greater London. Policy HC1 of the London Plan relates to heritage conservation and growth. Part C states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. Part D states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the Framework is a presumption in favour of 'sustainable development', a key component of which includes protecting and enhancing the historic environment. In general terms, the document places great weight on: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; their potential to contribute to sustainable communities; and the desirability of new development making a positive contribution to the historic environment's local distinctiveness. The Framework requires that when considering the impact of proposals on the significance of designated heritage assets, decision-makers should seek to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (NPPF 201) and attribute great weight to their conservation: "the more important the asset, the greater the weight should be" (NPPF, 205). Consequently, harm to such assets should be minimised, and should require "clear and convincing justification" (NPPF 206) and should be weighed against the public benefits of the proposals (NPPF 208).

Position

Historic England recognises the high significance of Highgate Cemetery, which is a remarkable 19th century funerary landscape containing buildings, structures and burials of great archaeological, architectural and historic interest.

We acknowledge the issues that the cemetery is experiencing in relation to the condition and accessibility of the landscape and many of the buildings within it. We also recognise the need to provide a sustainable long-term future for the cemetery that justifies a certainly level of change.

We therefore support the application proposals, which seek to enable and sustain the cemetery's continued use for burial and commemoration and as a visitor attraction. Many of the proposals have been subject to pre-application discussion and seek to minimise their impact on the historic environment, in accordance with national and local policy.

We note that the local authority may wish to take forward discussions in relation to the design and scale of the proposed buildings to further reduce any impacts that these may have. We would be happy to participate in those discussions.

We await further information on the proposed tree planting strategy following our recent site meeting. This strategy should detail how sites for tree planting will be selected, bearing in mind the significance of the historic landscape, the impact on existing memorials and burials. Following receipt of this information, our Archaeology



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



Officer, Greer Dewdney, will be providing further advice in relation to impacts on archaeology as a result of all of the application proposals.

We recommend that any grant of planning permission and listed building consent be subject to conditions covering the following matters. I confirm that we would be content to be consulted on any details submitted pursuant to those conditions:

Phasing plan outlining the program for delivery of the various works across the cemetery.

Method statements for works to the chapels and samples of materials and workmanship on site.

Method statements for works to other funerary and memorial structures. Samples of materials and workmanship on site.

Materials samples for the external elevations of the proposed new buildings.

Materials samples for proposed pathway surfaces.

Details of the disposal of any soil that may be displaced as a result of the proposed works. We would recommend that priority should be given to reuse within the cemetery, with consideration given to where the soil can be stored until it can be used and locations for reuse, such as providing fill in areas affected by settlement.

Method statements for construction of new pathways and drainage with consideration to securing the safety and stability of neighbouring monuments and burials.

Recommendation

Historic England supports the applications on heritage grounds.

We consider that the applications meet the requirements of the NPPF.

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



We would urge your Authority to address the advice set out in this letter, and determine the applications in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the listed building consent application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Claire Brady

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]

Enclosure: Checklist for notification to the National Planning Casework Unit

CHECKLIST OF INFORMATION FOR NOTIFICATION TO THE SECRETARY OF STATE (NATIONAL PLANNING CASEWORK UNIT)

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015

If you are required to notify the National Planning Casework Unit of this application, it will help to save time if you include the following documents:

“ Copy of the application

“ List of the drawing numbers



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk



Historic England

- “ Copy of the list description(s)
- “ Recent photographs if available
- “ Copy of the advertisement
- “ Copies of any representations received
- “ Statement explaining the extent to which the local authority has taken on board the advice and recommendations from Historic England and other consultees
- “ Confirmation of any amendments made to the application subsequent to initial notification to Historic England
- “ Explanation of why the local authority is disposed to grant consent, including copies of committee report(s) and minutes, where relevant
- “ List of proposed conditions



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.