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12 May 2025

**Objection to Planning Application 2024/5407/P & 2024/5423/L
Gardeners' Building, Highgate Cemetery (East Mound)**

Dear Ms Baptist,

We write as grave owners but also on behalf of other concerned grave owners and the wider community. We have a long-standing connections to the Cemetery, and submit a formal objection to the above applications for planning and listed building consent.

While we fully support the Trust's overarching vision to sustain and enhance Highgate Cemetery as a working burial ground and heritage landscape, we must stress that the proposed Gardeners' Building on the East Mound represents a serious and avoidable misjudgment. It is, to paraphrase many objectors, "the wrong building in the wrong place."

Heritage Significance of the East Cemetery and the Mound

Highgate Cemetery stands as one of the most iconic and culturally significant burial landscapes in the world. It is a Grade I registered historic park and garden—one of only a handful of cemeteries in the UK afforded such recognition—and is protected under multiple statutory designations. This Grade I status is not conferred lightly. It reflects the Cemetery's exceptional value as a historic, architectural, and communal site of national importance. Any proposal that would alter its layout, character, or setting must therefore be assessed with the utmost care, and with a clear understanding of how each part contributes to the whole.

While the West Cemetery is often celebrated for its dramatic architectural set-pieces—the Egyptian Avenue, the Circle of Lebanon, the Terrace Catacombs—it is important to recognise that the East Cemetery is no less significant in its historical development, landscape design, or emotional resonance. Opened in 1856 as a response to rising demand and burial space pressures on the west side, the East Cemetery represents an evolution in Victorian cemetery planning. It combines the picturesque with the pragmatic: broader walkways, more open plots, and gently sloping landforms that respond to both pastoral aesthetic ideals and modern functional needs.

The East Cemetery is not an afterthought or an adjunct. It is an integral counterpart in the paired design of Highgate's burial grounds—distinct yet complementary in character. It contains many of the site's most visited and symbolically charged graves, including those of Karl Marx, George Eliot, and other figures of international renown. But beyond these well-known names, it serves countless private individuals and families who have chosen this place for its sense of serenity, openness, and connection to nature. The East Cemetery is a living landscape: a place of active interment, personal ritual, and community memory. It is as vital to the overall identity of Highgate as the grand architecture of the West.

Within the East Cemetery, the **Mound** plays a uniquely important role. Rising along the eastern edge of the site, it provides both a physical and symbolic threshold between the public paths and the more private, elevated plots where many recent burials have taken place. It is a place of openness—an area of sunlight, wildflowers, and filtered views across the gravestones and treetops. The Mound's narrow slope, with its ecological variety and contemplative seclusion, creates a moment of pause in the Cemetery's spatial sequence. It is not heavily built or ornamented, but its very sparseness makes it emotionally powerful. It is a natural terrace in a site of layered meanings.

The heritage value of the Mound lies in its **continuity**—a landscape that has evolved gently, maintaining its essential character while absorbing the quiet, ongoing work of remembrance. It is part of what makes the East Cemetery legible as a designed funerary space, where slopes, paths, and plantings all contribute to an integrated experience. The Mound enhances the setting of adjacent listed graves and preserves the Cemetery's spatial hierarchy. It provides a contrast to the built form of the West, allowing light, air, and biodiversity to shape the atmosphere of the site. It is a defining part of the Cemetery's *genius loci*—its spirit of place.

Historic England's *Conservation Principles* emphasise the importance of preserving the evidential, aesthetic, communal, and historical values of heritage landscapes. The Mound contributes to all four. It holds **evidential value** as part of the Cemetery's mid-19th-century expansion and ongoing burial use. It has **aesthetic value** as a visual pause and open prospect within a site of layered complexity. It carries **communal value** as a cherished space of mourning, especially for those with recent graves located along its paths. And it has **historical value** as a space that embodies the evolution of Highgate's design—from monumental to pastoral, from enclosed to expansive.

Crucially, the Mound is not a neutral zone. It is **sacred ground**, part of the Cemetery's functional and symbolic infrastructure. It is not leftover space awaiting programming. It is not development land. It is an active component of Highgate's heritage landscape—used, loved, and grieved over every day.

The proposed insertion of a multi-use, two-storey staff and machinery facility into this space represents a profound misunderstanding of that heritage role. It violates the visual openness of the ridge. It breaks the established spatial hierarchy by placing a dominant built form above and beside graves. It introduces functional uses—machinery storage, staff circulation, public toilets—that are antithetical to the Mound's character as a place of rest and reflection.

There is no conservation logic that supports such a proposal. There is no heritage benefit that offsets the harm. The insertion is not additive, interpretive, or sensitive. It is alien. It imposes a visual and operational burden on a space that was never intended to carry one. And in doing so, it threatens the coherence and legibility of the entire East Cemetery.

Highgate's listing does not protect individual structures in isolation. It protects the designed landscape **as a whole**—the interplay between topography, monuments, vegetation, views, and rituals. The Mound is a critical part of that whole. Any attempt to treat it as a convenient construction site is not only a planning error but a heritage failure.

The planning authority has a duty, under national policy and statutory heritage guidance, to assess not only whether a proposal meets technical needs, but whether it respects and sustains the significance of the place. In this case, the proposed building diminishes the significance of the East Cemetery and the Mound within it. It undermines the heritage values for which the site is recognised and cherished.

To safeguard the Cemetery's legacy, and to honour the generations who have chosen to be buried within its bounds, the East Mound must be preserved not only as open land, but as **a meaningful, heritage-rich space of sanctuary and remembrance**. That is the context in which it should be understood—and the standard by which any intervention must be judged.

This objection addresses not only the measurable failings of the proposal, but also the profound emotional and spiritual harm it poses to mourners, the historical contradictions it embodies, the planning policy violations it represents, and the procedural injustices it reveals. We draw upon the Appendix attached to this to this letter.

1. Strategic Support, Tactical Objection

This objection is not an attack on the overarching intentions of the Highgate Cemetery renewal project. On the contrary, it arises from a place of alignment and shared purpose. We recognise and support the broader ambition of the Friends of Highgate Cemetery Trust to preserve, rejuvenate, and future-proof this exceptional historic landscape. We understand the necessity of long-term infrastructure investment, of improved accessibility, and of adapting facilities to serve both the living and the memory of the dead. We are, in many respects, allies in this work.

But precisely because we respect the complexity of the site and the vision behind its regeneration, we must raise a serious and focused objection to one element of the proposal: the siting, scale, and function of the Gardeners' Building on the East Mound. This objection is not blanket opposition. It is tactical. It targets a specific misjudgment—a single insertion within an otherwise thoughtful masterplan that risks undermining the Cemetery's spatial, emotional, and ecological integrity.

We acknowledge the Trust's logistical needs. We understand that tools must be stored, staff need welfare space, and vehicle access must be facilitated. These are not luxuries; they are essential functions of daily cemetery operations. But the assumption that these needs must be met through the construction of a two-storey service facility above and beside active graves on the Mound represents a critical error in spatial judgment. It is not a question of whether these functions are legitimate, but of where and how they are accommodated within a sacred and historic landscape.

To present the proposal as a binary choice—build here or build nowhere—is to construct a false dilemma. Many objectors have pointed this out, and they are correct. The East Mound is not the only viable location for a gardeners' facility. The East Compound can be refurbished or modestly extended. The space along Stoneleigh Terrace, already identified in the Design and Access Statement as serviceable can accommodate foot traffic and provide staff facilities in a discreet and 'passive' manner and offers a credible and less intrusive alternative. The proposed cafe/office Building, adjacent to the new entrance and circulation nodes, could co-house some heavier machinery. These options may not be as symbolically appealing as the Mound, but they are practical, respectful, and far less disruptive.

What makes the current proposal untenable is not just its scale, but its placement. The Mound is an emotionally and ecologically sensitive zone. It is home to active graves, recently bereaved families, and one of the few remaining open slopes in the Cemetery where wildflowers thrive and views remain unimpeded. To overlay this space with a facility that combines offices, a workshop, garage bays, WC facilities, and a terrace is to overwhelm it—visually, functionally, and symbolically. It is an act of overreach, however well-intentioned.

The design of the building further amplifies the problem. Despite references to "garden wall" typologies, the structure presents not as a subtle intervention but as a civic edifice: vertically imposing, materially heavy, and programmatically busy. It does not blend into the landscape; it asserts itself against it. It does not defer to the graves it overlooks; it dwarfs them. It does not speak the quiet architectural language of reflection and remembrance; it speaks instead the louder idiom of efficiency and functional programming.

None of this aligns with the masterplan's own stated ethos—one of modest, contextually sensitive additions guided by the spirit of the place. In its broader vision, the Trust has articulated a desire to preserve Highgate as a "working cemetery," a "living landscape," and a "place of sanctuary." These are goals we support. But this building, in this place, contradicts all three. It makes the Mound less usable for mourners, less alive for ecology, and less sacred as a space of sanctuary.

What we are asking is not a rejection of change, but a reorientation of it. Not a stoppage, but a correction. We urge the Trust and Camden Council to listen carefully to the depth and consistency of public concern—not only for what it says about this building, but for what it reveals about the kind of renewal that Highgate deserves. We are confident that the operational needs driving this proposal can be met elsewhere, with imagination, restraint, and respect for those who mourn here.

In that spirit, we restate our strategic support for the Cemetery's future, and our tactical objection to this one, mis-located, mis-scaled, and mis-characterised building. If this section of the plan is paused, reconsidered, and re-sited, we believe the masterplan will emerge stronger, more coherent, and more beloved by those it is meant to serve.

2. Site Geometry and Dimensional Inaccuracy

One of the most critical—and demonstrable—flaws in the current planning application lies in its **misreading of the physical conditions** of the East Mound site. The Gardeners' Building, as proposed, simply does **not fit** within the actual spatial, topographic and functional constraints of the embankment. These are not clear from the drawings and are not drafting discrepancies—they are substantive, consequential, and indicative of an ambition to squeeze an unsuitable brief into a very constrained site.

Width Exceeds Available Platform

The proposed building footprint measures **5.8 metres in width**, as indicated in the applicant's floor plans and elevations. However, detailed site measurements show that:

- The **grassed embankment** into which the building would be cut is only **3.9 metres** deep from path edge to grave line;
- The **current footpath** is **1.5 metres wide**;
- Together, the **total buildable zone** (from edge of footpath to boundary with graves) is just **5.4 metres**—a full **400mm narrower** than the proposed building footprint.

This means that in order to accommodate the proposed footprint:

- Either the embankment must be **cut back into burial land**, disturbing graves;
- Or the public path must be **narrowed** to substandard, unsafe dimensions;
- Or the building must **project** into the path corridor, effectively pinching circulation space and reducing accessibility for wheelchair user

None of these outcomes are acceptable. Each introduces new risks—to pedestrian safety, heritage features, and grave integrity.

Reduction of Circulation Width to Unsafe Standards

The current Mound path is **1.5m wide**, a reasonable minimum width for wheelchair users, visitors walking in pairs, and occasional trolley or stretcher use. The proposed scheme reduces this to **approximately 1.09m**, and introduces additional impediments such as projecting seating ledges and gate mechanisms.

The result is a **constrained, high-walled corridor** that:

- Prevents safe/dignified passing of two individuals (let alone one person and a wheelchair user);
- Makes formal and informal grave access more difficult;

- Compromises visibility and movement for visitors in mourning or distress;
- Introduces logistical obstacles to the movement of cemetery equipment or future interventions (e.g. stretchers, diggers, or grounds maintenance tools).
- The reduced width path does not allow pallbearers to access graves

This path is not ancillary; it is a **lifeline to dozens of graves**. Any proposal that compromises its navigability represents a **direct infringement** on the rights and dignity of mourners.

Vertical Overreach and Misrepresented Massing

The Design and Access Statement and published photomontages fail to accurately represent the vertical impact of the building. The building, as measured and reconstructed in elevation presents:

- A **5.0 metre vertical rise above the Mound level** at its southern end;
- A **7.8 metre rise above the path level** below;
- A **sheer two-storey façade** pressed directly to the path edge, with no setback, verge or relief.

These dimensions are underplayed in the application visuals, which use wide-angle lenses and out-of-scale figures to diminish perceived mass. In reality, the structure's wall reads as a **monolithic slab** of layered concrete—a stark contrast to the vegetated slope it replaces.

This discrepancy calls into question the accuracy of other aspects of the proposals.

Plan-to-Site Mismatch and Inaccurate Construction Assumptions

The plans submitted imply that the building will sit “within” the embankment, as if the slope can be neatly cut to accommodate both levels and structure. However:

- No detailed section drawings show how the **retaining walls**, foundations or service zones interact with the graves above;
- The **path above the building** must be entirely demolished and rebuilt to accommodate the lower ground level, with no evidence of how this will be staged without restricting grave access;
- The **500mm construction margin** shown around the building on the plans implies **direct excavation within the boundary of active graves**;
- The lack of a **construction method statement** makes it impossible to believe that this interface can be built.

In short, the geometry of the site has been conceptually simplified to allow the building to fit, but **in practice, it does not**. The drawings have not responded to the complex vertical and horizontal constraints of a site layered with:

- Historic burials (many undocumented);
- Active visitation routes;
- Structural soil variability due to decomposition and water tables;
- Emotional and spiritual sensitivities not captured by plan geometry.

Implausible Foundation and Structural Assumptions

The proposed building is heavy—constructed in layered concrete with structural spans, green roof loading, and embedded equipment bays. Yet the proposed slab appears to float just above the grave line, as if immune to subsoil variability or archaeological disturbance.

This raises serious concerns:

- **Has a ground investigation or soil stability assessment been conducted?**
- **How will foundations avoid disturbing historic or reused grave sites?**
- **What engineering justification exists for building on made ground directly adjacent to open graves?**

Without answers to these questions, the foundation strategy appears **speculative and implausible**—designed to avoid difficult truths about the real conditions on site.

Construction Access and Margins Are Unworkable

Even if the building were somehow to fit geometrically, its **construction margins** do not. The site provides:

- No vehicular access from above;
- No clear perimeter zone for scaffolding or plant;
- No safe laydown or delivery area that avoids disrupting graves or path users.

By necessity, construction will:

- Block the main path for extended periods;
- Involve crossing or bordering graves with machinery;
- Interrupt grave owner access for months;
- Potentially result in damage to headstones, burial ground, or biodiversity areas.

Yet none of this is addressed in the application. The **absence of a Construction Management Plan or Method Statement** is not an omission—it is a refusal to confront the reality that this building is physically incompatible with its proposed site.

The Gardeners' Building, as currently designed, **does not fit** the East Mound. Not in plan, not in section, and not in experiential terms. The dimensional inaccuracies are not academic—they will directly harm grave access, site safety, and visual legibility.

To proceed with this proposal would require Camden Council to approve a scheme whose geometry contradicts the site's reality—a contradiction with serious implications for heritage protection, accessibility, construction safety, and stakeholder trust.

3. Architectural Overdevelopment and Overbearing Scale

The proposed Gardeners' Building is, at its core, an instance of **architectural overdevelopment**—a structure whose size, function, and form dramatically exceed what is appropriate or proportionate for its context. Far from being a discreet “garden wall” or landscape element, it manifests as an overbearing institutional volume that dominates a delicately scaled, emotionally charged, and historically protected site.

This is not simply a question of taste or aesthetics. It is an architectural misjudgment with measurable and enduring consequences—on visual experience, setting, visitor movement, and emotional resonance.

Scale in Relation to Context

The building measures **25.5 metres in length**, with a visible façade rising to:

- **7.8 metres from the lower path**, and
- **5.0 metres above the Mound** at its highest point.

For reference, this height **exceeds the colonnade** at the main West Cemetery entrance—a formal, Grade I listed architectural element. Yet unlike the colonnade, which is set back within a ceremonial forecourt and softened by landscaping, the Gardeners' Building:

- **Is pressed directly against the public path**, with no setback, verge or green buffer;
- **Runs parallel to a continuous line of active graves**, in immediate proximity to areas of emotional use;
- **Rises as a flat wall** with no modulation, articulation or visual porosity on its lower façade.

The effect, as shown in the Appendix at the end of this document, is of a **monolithic slab** embedded in the landscape—an architectural expression entirely foreign to the Cemetery's garden language of stepped terraces, sloping paths, ivy-covered tombs, and tree-filtered views.

Vertical Massing and Psychological Weight

The building's two-storey form, coupled with its layered concrete façade and commercial-style fenestration, gives it a **top-heavy, looming character**. From below, the wall presents as a blank, fortress-like surface, with openings resembling service shutters or garage doors rather than commemorative or landscape-facing elements.

This architecture exerts a **psychological weight** on the space, compressing the experience of walking along the Mound path into a corridor of hard surfaces, limited views, and heavy overhead bulk. The cemetery's existing spatial rhythm—light filtering through trees, shallow transitions from enclosure to openness—is replaced by a single uninterrupted visual mass.

Such overbearing form is not compatible with the design principles of a cemetery. It disrupts the **emotional cadence** of movement between graves, breaks the visual flow from monument to horizon, and introduces a sense of institutional imposition into what was previously an intimate, reflective space.

Overdevelopment of Function in a Sensitive Zone

The building does not just impose itself visually—it represents **functional overdevelopment** within a zone that should have been considered sacrosanct. The proposal incorporates:

- Two floors of use, including office desks, kitchenette, WCs, and drying room;
- Storage for heavy machinery, including chipper, loader, digger, and mower;
- Maintenance workshops and staff facilities;
- A public-access WC, creating circulation through what is otherwise a quiet graveside area;

- A terrace—a "viewing platform" that invites surveillance and activity over active graves.

No other structure in the Cemetery combines so many conflicting uses in such close proximity to mourners. The combination of back-of-house functions (tools, vehicles, toilets) and front-of-house gestures (terrace, desked office) within this location amounts to an **overprogramming** that is wholly inappropriate for a burial zone.

This is not the modest "support facility" described in some consultation materials. It is a **highly active infrastructure node**, wrongly inserted into a sacred and passive landscape.

Mischaracterisation as a "Garden Wall"

Throughout the application documents, the proposed building is described as a "**garden wall**", a term likely chosen to evoke discretion, minimalism, and continuity with the landscape. In practice, however, the building reads more as:

- A **municipal depot**, due to its garage shutters, terrace railings, and access stairs
- An **urban infrastructure block**, because of its stacked volume and circulation-heavy ground plan;
- A **crematorium wall**, as described by multiple grave owners who find its scale and form reminiscent of state facilities for the dead, rather than informal settings for remembrance.

This mischaracterisation matters. It conceals the reality of the building's presence and aesthetic, and it misleads stakeholders and planners into imagining a structure that visually recedes—when in fact it emphatically asserts itself.

To describe this as a "garden wall" is akin to describing a service depot as a hedge. The terminology collapses under scrutiny.

Failure to Respond to Historic Landscape Language

Highgate Cemetery is globally recognised not for singular architectural statements, but for its **layered, fragmentary, and picturesque character**—a dialogue between architecture, landscape, decay and renewal. Within this context:

- Structures are embedded in topography, not projected against it;
- Architectural forms are either ceremonial (chapels, catacombs) or discrete (tool sheds, lodges);
- Paths are meandering, not orthogonal;
- Visual rhythm is achieved through vegetation, tombstones, shadows—not concrete slabs and flat roofs.

The Gardeners' Building ignores this vocabulary. It introduces a **uniform, linear, non-pedestrian-scaled mass** that speaks the language of civic architecture rather than funereal landscape. Its presence is not contextual—it is corrective. It does not nestle into the Cemetery's layers; it imposes a new order.

In doing so, it contradicts the very conservation principles that the Cemetery's renewal claims to uphold. Historic England's *Conservation Principles* and *GPA3* guidance emphasise the importance of architectural and spatial character in the setting of listed landscapes. The proposed building is antithetical to both.

Precedents Show More Sensitive Alternatives

Comparable cemeteries have all undertaken renewal and infrastructure upgrades. None have inserted **two-storey, multi-use service buildings** within their most sensitive memorial zones. Instead, they have:

- Placed support buildings near entrances;
- Used concealed or embedded construction techniques;
- Limited the visual and functional ambition of support structures;
- Chosen architectural languages that defer, rather than compete, with the cemetery setting.

Highgate's proposal, by contrast, is overreaching—both literally and figuratively.

The Gardeners' Building is a case of **architectural overdevelopment**—a structure too large, too active, and too disconnected from its context to be accepted in a site of such national heritage value. Its overbearing scale, multi-use footprint, and mischaracterised design present not just a failure of proportionality, but a betrayal of the architectural ethos that makes Highgate Cemetery exceptional.

We urge Camden Council to demand an approach more in keeping with the Cemetery's historic and emotional character—one that understands that good architecture is not about assertion, but about deference to place, memory, and meaning.

4. Visual and Emotional Harm to Grave Owners

The most profound objections to the proposed Gardeners' Building do not come from architects, historians, or planners—but from the bereaved. They come from families who visit the Mound weekly or daily, who tend to graves with watering cans and hand tools, who sit on folding chairs beneath the trees, who read aloud to headstones or quietly lay flowers at the feet of loved ones. For these individuals, the Mound is not an abstract parcel of land or a convenient embankment for development—it is a site of sacred ritual, personal reflection, and enduring emotional labour. The intrusion of the proposed building into this space will cause irreversible visual and emotional harm.

The visual harm is immediate and unavoidable. Where today there is filtered light, open sky, and a gentle green slope, the proposed building would introduce a towering concrete façade with garage doors, rooftop railings, and staircases. This transformation would replace a soft and open prospect with a hard, institutional wall. The sense of calm created by dappled light, woodland margins, and glimpses across the cemetery will be replaced by shadow, enclosure, and the visual impression of occupation and surveillance.

Grave owners will no longer be able to sit in peaceful proximity to their loved ones without the looming presence of a staff building overhead. Instead of looking out to nature and open sky, they will look into the windows of an office, the grilles of a workshop, and the backs of vehicles. What was once a space for inward reflection will become a corridor of movement, infrastructure, and noise. The view from many graves will now terminate in a wall.

This change is not merely visual. It is deeply emotional. Dozens of grave owners have expressed feelings of betrayal, grief, and heartbreak at the prospect of this development. Many state, clearly and without exaggeration, that had they known such a building would be placed above or beside their family's grave, they would never have chosen this location for burial. The wound caused by that retrospective knowledge—of having been misled or uninformed—runs deep. It is not something that landscaping or mitigation can repair.

Visitors have described the act of grieving at Highgate Cemetery as a delicate and vulnerable process. It involves not just memory, but ritual—walking certain routes, stopping at certain

trees, sitting in moments of solitude, and feeling the presence of others through silence rather than interaction. The intrusion of a building that introduces mechanical noise, staff traffic, reversing alarms, footfall, and the functional rhythms of a workplace would violate this ritual irreparably. It imposes the practical over the poetic.

For those with recent or ongoing bereavements, the psychological impact is severe. The very presence of a structure labelled in planning documents as “staff mess”, “vehicle storage”, or “public toilet” in close adjacency to a grave is jarring. The juxtaposition of life’s most routine and utilitarian acts with its most sacred and solemn setting creates a rupture in meaning. As one grave owner poignantly wrote, “You would not build a maintenance depot next to a war memorial. Why do it here?”

There is also a quieter form of emotional harm, one rooted not in disruption but in diminishment. The Cemetery is a place where people come to feel a connection—spatial, emotional, even metaphysical—to those they have lost. That connection is aided by beauty, tranquillity, and continuity. It depends on the feeling that the place itself is stable, protected, and held in trust. The introduction of the Gardeners’ Building sends the opposite signal: that convenience and operational utility can take precedence over mourning, that the presence of grief is negotiable, and that the sacred can be made secondary.

No matter how well this building is constructed, no matter how quietly the staff conduct themselves, no matter how sympathetic the concrete mix or how verdant the planting, its presence will always be experienced by grave owners as a form of intrusion—because it was not asked for, not consented to, and not needed here.

Highgate Cemetery is not a park, nor a construction site, nor a museum to be walked and photographed at arm’s length. It is a place of active, lived grief. And that grief, like the graves themselves, deserves to be protected. The Gardeners’ Building threatens to replace empathy with expedience, to displace the silent dignity of mourning with the hum of operational life. It casts not just a literal shadow over the Mound, but a symbolic one.

To ignore these voices, to proceed as though these harms are incidental or easily absorbed, would be to misunderstand the very reason cemeteries exist—not just as repositories of the dead, but as sanctuaries for the living.

5. Loss of Light, Openness, and Ecology

The East Mound at Highgate Cemetery holds a rare quality within the Cemetery’s landscape—a sense of openness, calm, and natural vitality that allows light, memory, and mourning to coexist without intrusion. This quality is not incidental; it is the result of careful topography, sensitive ecological growth, and the absence of permanent built structures in close proximity. The introduction of the Gardeners’ Building would fundamentally and irrevocably disrupt this balance. Its form, scale, and siting would destroy not only the physical openness of the Mound but the atmosphere of peace, natural beauty, and ecological richness that has made it a sacred and beloved space for mourners.

The Mound is elevated, gently sloped, and broadly open to the sky. It is a place where sunlight plays across the landscape throughout the day, illuminating wildflowers and gravestones, warming visitors who come to sit, reflect, or tend to family graves. The proposed building would cast a long, continuous shadow along the lower edge of this space, severing that relationship between light and ground. At up to 7.8 metres tall from the lower path, and 5 metres from the Mound level itself, the structure would become a visual barrier to light, blocking morning and afternoon sun and creating a zone of persistent shade along a once sunlit margin. The transition from dappled brightness to dim enclosure is not a subtle change; it will be felt physically, emotionally, and environmentally by every person who uses this space.

The loss of openness is just as significant as the loss of light. Where the Mound once offered wide views—across treetops, toward the Karl Marx monument, and across gravesites—this building would now interpose a thick, vertical wall. From the primary path, the Cemetery would no longer appear open and tiered, but abruptly terminated. Instead of trees and sky, mourners

would see layered concrete and metal gates. The natural slope of the Mound, which currently fosters a soft transition between higher and lower levels, would be replaced by a retaining structure with sheer vertical mass. This change undermines the Cemetery's spatial legibility and disrupts its layered, woodland character. It collapses a long-standing tension between built and natural, sacred and functional, by forcing a civic building into a contemplative landscape.

The ecological harm caused by this development is both immediate and lasting. The Mound's embankment, currently covered in wildflowers, ivy, and low grasses, is home to pollinators, birds, and small mammals that depend on undisturbed green corridors. The proposal would see this embankment excavated, paved over, and structurally retained with concrete. The habitat would be destroyed—not mitigated or reconfigured, but removed altogether. No viable ecological offsetting strategy is proposed. Green walls or planter boxes do not replicate habitat continuity, soil ecology, or drainage function. The site is part of a wider ecological network within the Cemetery, and its loss will fragment that network, reducing biodiversity and disturbing existing patterns of wildlife movement.

This destruction is not abstract. It is visible and measurable. The embankment is a living system. It holds moisture, filters runoff, supports native flora, and provides refuge for insects and nesting birds. Its root systems stabilize soil and manage the slope's integrity. The replacement of this natural slope with a retained building and access path is ecologically regressive.

Emotionally and experientially, the cumulative impact of this change is devastating. Grave owners have described how the presence of open sky and sunlight helps frame their mourning. They speak of planting small bulbs and wildflowers, of sitting in warmth, of the uplifting visual contrast between the deep green of the embankment and the pale stone of the graves. To have this replaced by a functional utility structure is not only architecturally inappropriate—it is spiritually violating. The loss is not simply environmental; it is affective. It transforms the character of grieving from one of openness and connection to one of obstruction and estrangement.

In practical terms, the removal and reconstruction of the path above the building introduces further harm. During construction, the only route to a large number of graves will become inaccessible. No viable temporary path has been proposed. The entire east-facing edge of the Mound will be encroached upon by scaffolding and machinery. In the longer term, the rebuilt path will be narrower than existing, compromising accessibility for wheelchair users and mourners who require assistance. The sense of generous circulation that currently characterises the Mound walk will be lost.

There is also symbolic harm in what the proposal represents. The act of building over the wildflower slope and shadowing graves suggests a shift in priorities—from the sanctity of memorial space to the convenience of logistics. It signals a willingness to sacrifice biodiversity, ritual space, and public peace for operational functionality. That decision is not neutral; it carries a message. It tells grave owners that nature, quiet, and openness can be traded away. It tells wildlife that this corridor is no longer theirs. And it tells the public that heritage designations and ecological values are negotiable when logistics dictate.

The Mound does not need to be activated, programmed, or formalised. Its value lies in its **passivity**—in the way it holds space gently, allows light to land, invites growth, and supports silent connection. The proposed building destroys this. It is not simply too large. It is fundamentally misplaced. In a Cemetery where almost every inch speaks to the layering of time, nature, and memory, this structure introduces rupture. It erases more than it provides.

6. Planning and Heritage Policy Contraventions

Highgate Cemetery is protected under multiple statutory and policy designations that raise the threshold for any proposed development. The current proposal fails to meet these criteria and must therefore be refused.

Metropolitan Open Land (MOL)

The East Cemetery, including the Mound, falls within an area designated as Metropolitan Open Land (MOL) by the London Borough of Camden. MOL carries the same status in planning terms as Green Belt and is protected by national, regional and local policy.

Policy G3 of the London Plan (2021) requires that MOL be protected from development that would have a detrimental impact on openness, permanence, or function. Camden's Local Plan Policy A2 and Policy NE1 echo this guidance, explicitly stating that any development on MOL must be essential, small in scale, and must not harm its open character.

The Gardeners' Building, by contrast, is:

- **Large and overbearing**, with a mass of 25.5m length and up to 7.8m height,
- **Visually and functionally intrusive**, serving as a depot for tools, machinery, and staff,
- **Not essential to public use**, as alternative locations already exist for this function,
- **Permanent in nature**, with deep foundations and retaining walls.

The proposal irreversibly changes the open and pastoral character of the site. It turns a grassy embankment into a built edge and severs the natural transition from treetop to tomb. It is categorically contrary to the protection afforded under the MOL designation.

Grade I Registered Historic Park and Garden

Highgate Cemetery is included in Historic England's Register of Parks and Gardens of Special Historic Interest (List Entry No. 1000810). It is classified as Grade I—the highest level of heritage protection—due to its exceptional historic, architectural, and communal significance.

According to Historic England's *Conservation Principles* and *Good Practice Advice Notes* (GPA3), proposals within the setting of a Grade I historic park or garden must preserve and enhance its significance. Development must demonstrate:

- That it does not harm the character or appearance of the historic landscape,
- That it sustains the evidential, communal, and aesthetic values of the site,
- That any intervention is justified by exceptional public benefit.

The Gardeners' Building breaches each of these criteria:

- **Character Harm:** The structure introduces an industrial form into a contemplative, organic setting. It conflicts with the cemetery's intentional absence of utilitarian structures beyond the entrances.
- **Aesthetic Harm:** It disrupts key vistas across and from the Mound and toward the Karl Marx monument, eroding the layered visual hierarchy essential to the Cemetery's design.
- **Communal Harm:** It directly affects mourners and grave owners who rely on this space for quiet grief. Their use of the site is not a convenience but a legally and spiritually grounded practice.

- Moreover, no Setting Study, Visual Impact Assessment, or Heritage Statement has been submitted to justify the proposal's compatibility with the Cemetery's status. This is a glaring omission.

Paragraph 204 of the NPPF (2023)

The National Planning Policy Framework (NPPF) at Paragraph 204 requires that local planning authorities should refuse consent for development that results in substantial harm to the significance of designated heritage assets, unless it can be clearly and convincingly demonstrated that the harm is necessary to achieve substantial public benefits that outweigh that harm.

The Gardeners' Building does not deliver such benefits. Its proposed function—staff welfare, garden tools, machinery and WC facilities—can be located elsewhere. Nor has it been demonstrated that other locations (such as the East Compound or Stoneleigh Terrace garages) are unfeasible. Thus, the bar for "substantial benefit" is not met.

Listed Building and Setting - Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990

Section 66 of the Act requires that decision-makers "shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

This includes not only individual listed tombs, but also landscape elements and inter-visibility between features. Views from and to the Karl Marx tomb are directly compromised. The open quality of the Mound contributes positively to the setting of listed features across the East Cemetery. Blocking these views breaches the statutory duty under the Act.

Camden Local Plan and Highgate Neighbourhood Plan

The proposal is in conflict with several relevant local policies:

- **Policy D1** (Design): Fails to respect the character, form and setting of Highgate Cemetery.
- **Policy D2** (Heritage): Results in clear harm to the setting of multiple listed monuments and the designated landscape.
- **Policy NE1** (Natural Environment): Erodes biodiversity (wildflower bank) and the Cemetery's open, ecological character.
- **Highgate Neighbourhood Plan Policy HC1**: Protects Highgate Cemetery as a heritage asset and community space of unique character. The proposal fails to meet HC1's objective to ensure any development supports and enhances the Cemetery's distinctive landscape.

Precedents and Comparative Sites

Comparable Grade I cemeteries such as Brompton and Nunhead have introduced infrastructure discreetly—either below ground, at site perimeters, or behind vegetative screens. None have constructed two-storey service buildings adjacent to active graves. This proposal sets a damaging precedent not only for Highgate, but for other protected burial landscapes in the UK.

In conclusion, the proposal is in clear contravention of multiple layers of planning policy and legal protection. These are not procedural technicalities—they are the essential frameworks that preserve the integrity of the most cherished historic sites. We urge Camden to uphold these policies and reject the application accordingly.

7. Construction and Access Challenges

Beyond questions of architectural appropriateness or planning policy compliance, the proposal for the Gardeners' Building presents a series of immediate and long-term logistical challenges that have been overlooked or understated in the application materials. The reality of building at this site—both during construction and into its operational lifespan—raises serious concerns around safety, practicality, and the ongoing disruption it would impose on grave owners and Cemetery operations alike.

The East Mound is one of the most constrained and actively used areas in the Cemetery. It is hemmed in by steep topography, narrow circulation paths, and a high concentration of active grave plots. It is also a pedestrian-only zone with no immediate vehicular access and no staging areas for machinery or materials. To insert a two-storey building into this context is not only spatially problematic—it verges on implausible from a construction logistics perspective.

To construct the lower ground floor, the entire pathway above would need to be demolished and excavated. This path serves as the sole means of access for dozens of graves, and during the construction period it would be inaccessible. No temporary pathway of equivalent width and surface has been proposed, and no construction phasing plan has been offered that addresses the need to maintain access for grave owners. In some cases, families visit graves daily; others come weekly with mobility aids, pushchairs, or ritual objects. To deny them this access for the duration of the works—likely many months—is not a mere inconvenience. It is a disruption of grieving and a removal of rights.

The issue extends beyond horizontal access. The vertical relationship between the proposed structure and the surrounding paths introduces substantial excavation risk. The submitted plans indicate that a “retaining wall” system will be used to create the building's lower level, yet no construction method statement has been included. Without detailed sequencing, it is unclear how works can be undertaken without disturbing existing graves, collapsing the slope, or damaging root systems and nearby monuments. Given that graves may be less than one metre from the excavation edge, this absence of information is extraordinary.

Furthermore, the space around the proposed footprint is insufficient to allow for safe scaffolding, hoarding, laydown, or vehicle manoeuvring. Construction margins will, by necessity, extend into adjacent burial plots or block the lower main path that runs parallel to the structure. This path is a key east–west pedestrian route and provides direct access to memorials, trees, and benches. If this path is obstructed during construction, large portions of the East Cemetery will become unreachable by standard means—disrupting not only mourners but also essential Cemetery operations.

The proposed building itself is also burdened with access challenges that extend well beyond the construction phase. In its completed form, the structure effectively blocks the only vehicular route to this part of the Mound. This has direct implications for future grave digging, which in modern cemeteries is increasingly reliant on mini-diggers and compact utility vehicles. The path leading to the Mound, already reduced in width under the current scheme to approximately 1.09 metres, would be insufficient for machinery access. This could make it impossible to dig future graves in the surrounding plots without either hand excavation or costly, indirect workarounds.

Internally, the building includes chevron parking for multiple garden vehicles—a layout more suited to open, rear-access sites. On a narrow slope with no turning room, this is impractical. Reversing heavy machinery into angled bays on a slope above active graves is not only operationally difficult but hazardous. The garage floor slab itself is angled and shallow, making it suboptimal for vehicle or trailer storage. The need to employ rising gates and complex mechanical entry points further highlights the awkwardness of the siting: such mechanisms are not being used because they enhance functionality, but because the site leaves no other viable option.

These Heath Robinson solutions—sloped storage slabs, vertical-lift gates, pinched paths—are signs of architectural compromise born from trying to force a building into a space that was

never meant to contain one. The physical conditions of the site have dictated awkward and precarious design decisions that will only compound difficulties over time.

What has not been addressed at all in the application is the long-term maintenance of the building. Routine repairs, façade access, drainage clearance, roof inspections—all of these require perimeter space, which does not exist on the grave-facing side of the building. Any future works will require scaffolding or platform systems that will necessarily extend into burial land or block the surrounding paths once again. In other words, the burden of this building will not be limited to a single construction period—it will recur every time a panel needs repair, a pipe needs replacing, or a façade needs cleaning.

There is also the question of unintended consequences. Soil movement, structural settlement, and drainage failure are all heightened risks when building into a slope containing decomposing organic material and unrecorded voids. The long-term consequences of building against or over graves in a high-water-table zone are not easily predicted, but they are always high-stakes. The building will not just be sitting on made ground—it will be sitting in dialogue with it, over it, and around it, for decades to come.

All of this points to a simple truth: the building is ill-suited to its proposed location not just because of its form or function, but because **it is constructively incompatible with the conditions of the site**. To proceed would be to impose disproportionate risk, disruption, and difficulty on a setting that should be defined by calm continuity. There is no feasible way to build here without violating graves, blocking access, or compromising safety. And there is no feasible way to maintain what is built without repeating those intrusions.

This is not a logistical problem that can be engineered away. It is a foundational misjudgment in site selection—one that no technical workaround can truly resolve. It is not enough to ask whether the building will function once built; we must also ask **whether it can or should be built at all** in this location. All evidence suggests it cannot.

8. Operational Misjudgement and Functional Inefficiency

While the Gardeners' Building is presented as a rational response to operational needs—providing consolidated facilities for staff, tools, machinery, and welfare—it is, in reality, a significant misstep in functional planning. Rather than improving the efficiency of Highgate Cemetery's day-to-day operations, the proposed structure introduces new inefficiencies, locational disconnects, and long-term management complications that have not been fully addressed by the application.

At the most basic level, the location of the Gardeners' Building is poorly integrated with the operational rhythms of the Cemetery. It is situated deep within the eastern half of the site, high on the Mound, and far from the Cemetery's primary entrance, main circulation routes, and delivery access points. As a result, every staff member, piece of equipment, and service vehicle will need to navigate narrow, pedestrian-priority paths to reach the building multiple times each day. This introduces an unnecessary and avoidable layer of friction to cemetery maintenance routines—particularly when one considers the frequency and volume of activity required to maintain over 14 hectares of complex and varied terrain.

Rather than centralising operations, the Gardeners' Building effectively decentralises them. It creates a satellite outpost at the periphery of the Cemetery, disconnected from visitor management, ticketing, administration, and vehicular entry. Staff will be forced to travel back and forth across the site to coordinate with teams based in the West Buildings or to respond to tasks elsewhere on the grounds. It adds logistical burden where there should be cohesion. This is particularly problematic for emergency response, equipment failures, and coordination during large funerals or high-traffic events.

The proposal also ignores the limitations of path-based transport. Many of the routes to the Mound are narrow, steep, and lined with fragile memorial structures. The repeated movement of maintenance vehicles—some of which are heavy or trailer-based—will accelerate path wear, increase the risk of collisions or monument damage, and pose discomfort to mourners who

value peace and safety over proximity to operations. What is gained in apparent seclusion is lost in practicality.

The building's own internal programming further reveals operational inefficiencies. It divides staff functions across two floors, introducing vertical movement between machinery storage below and desk, welfare, and sanitary facilities above. This separation not only creates additional wear and inefficiency for daily use—it also increases the building's mass and visual impact. There is little evidence to suggest that such internal stratification is necessary. A well-designed single-storey facility or a series of facilities elsewhere could have delivered the same functions with fewer logistical constraints, lower construction costs, and a much-reduced footprint.

Furthermore, the proposed garden vehicle garage employs a chevron parking layout on a sloped concrete slab, a configuration that is functionally awkward in the best of circumstances and nearly unworkable within a confined, narrow, dead-end access zone. Reversing vehicles into angled bays on an incline, mere feet from active graves, is neither safe nor operationally efficient. Nor does the scheme provide meaningful manoeuvring room for trailers or wider equipment. These decisions speak not to considered workflow planning but to reactive, space-constrained improvisation.

The proposal also burdens the Cemetery with unnecessary duplication. The masterplan already includes a substantial new operations and visitor building at the West entrance, with offices, volunteer coordination spaces, and café facilities. These could readily house many of the functions now awkwardly embedded into the Mound. By splitting operations across two distant and non-contiguous sites, the Trust risks undermining the very organisational clarity it seeks to achieve. Staff will be divided. Communications will be delayed. Equipment will be duplicated or inefficiently located.

Alternative sites—such as the existing East Compound or the garages off Stoneleigh Terrace—would solve many of these problems. They are closer to vehicle access. They are further from active graves. They are already service-oriented in character and would allow the consolidation of light-duty functions without the introduction of new landscape or emotional impacts. Yet these options have not been explored in any detail, nor have side-by-side comparisons been offered in the submitted materials. Instead, the Gardeners' Building is positioned as a fait accompli, despite being among the least operationally intelligent sites available.

Additionally, the building introduces new maintenance burdens. Its positioning below a reconstructed path, its adjacency to unstable soil, and its roof terrace use mean that upkeep will require complex logistical support. Routine access for inspection, cleaning, or repair may necessitate scaffolding over graves or restricted access to the Mound. This is not a building that disappears once completed—it continues to interrupt, impose, and challenge the site's long-term operability.

In this way, the proposal fails a fundamental test of good design: it does not simplify the life of the site. It does not ease movement, reduce disruption, or centralise activity. It fragments, duplicates, and complicates. It makes the work of caring for Highgate Cemetery harder, not easier. And in doing so, it risks undermining the very argument for its necessity.

Alternative Sites and Viable Options

It is important to stress that this objection is not a rejection of the need for improved gardener and operations facilities at Highgate Cemetery. On the contrary, we recognise the necessity for modern, functional infrastructure to support the essential work of maintaining such a complex historic landscape. Our concern lies specifically with the proposed **location** and **form** of the Gardeners' Building—not with its underlying purpose. In this spirit, we offer several, under-explored alternatives that could allow the Trust to meet its operational objectives while avoiding the cultural, emotional, and environmental harms associated with the East Mound proposal.

Redevelopment and Expansion of the Existing East Compound

The current East Compound—already serving as the primary base for gardening staff and tool storage—presents the most obvious and least disruptive location for a consolidated facility. While the Design and Access Statement suggests this compound is outdated or spatially constrained, no detailed feasibility study has been submitted to assess its capacity for sensitive redevelopment.

There are clear opportunities here:

- The site is **already associated with utility functions**, and its redevelopment would not alter the Cemetery’s landscape character or intrude upon sacred spaces.
- It benefits from **proximity to Swain’s Lane**, allowing safer and more direct vehicular access for machinery and deliveries.
- With modest vertical reconfiguration or limited excavation (more easily achieved here than on the Mound), additional capacity for staff welfare, equipment storage, and WC facilities could be incorporated discreetly into a single-storey or partially sunken structure.
- Unlike the Mound, this location does **not abut active graves**, meaning construction and maintenance would pose significantly less risk to mourners or heritage fabric.

Upgrading the East Compound also aligns with the principle of **consolidating like functions** within established service zones, minimising the operational fragmentation that the Mound proposal introduces.

Consolidation within or adjacent to the West Operations Building

The masterplan includes a major new West Operations and Visitor Facility adjacent to the main entrance and courtyard, designed to accommodate office and volunteer coordination space. There is a compelling case for co-locating gardening functions within this larger and more generously accessible hub.

This approach would:

- Bring staff functions together under one roof, enhancing communication, coordination, and efficiency.
- Allow secure, segregated access to tool storage and vehicle bays at lower ground level, with public-facing amenities and offices above.
- Use the **existing topography of the West side** to accommodate multiple levels while remaining visually modest from primary paths.
- Take advantage of existing hard surfaces, courtyards, and utility connections, reducing the need for new infrastructure.

Moreover, the architectural language of the West Building already anticipates such capacity. Adapting its footprint to include gardening operations is both spatially logical and functionally efficient, enabling a unified “back-of-house” area that does not compromise the sanctity of burial zones.

Use of area adjacent to Stoneleigh Terrace

Running along the southern boundary of the Cemetery, adjacent to Stoneleigh Terrace, is a series of underutilised garages and hardstanding areas currently used for ad hoc skip storage and vehicle access. These spaces are outside the core burial landscape, close to the Cemetery’s perimeter, and already serve semi-industrial functions.

The advantages of this site are numerous:

- It offers **pedestrian access without compromising pedestrian paths** or quiet memorial areas.
- It is spatially flexible, potentially accommodating both open-air and enclosed storage, as well as a modest welfare structure.
- The area can be effectively **screened from public view**, and improvements could be made with minimal heritage impact.
- Redeveloping this zone would be significantly less intrusive to the visitor experience and would avoid excavation over or adjacent to graves.

This area could serve as a **satellite compound** or even the principal gardeners and volunteers base, particularly if internal links with the East and West sides of the Cemetery can be improved. The heavier machinery need not be adjacent but can be housed more centrally. Such use would also respond positively to the Trust's stated goals around environmental sustainability by avoiding new building on greenfield heritage land.

Hybrid Approach Using Multiple Smaller Facilities

Finally, the Trust may consider **disaggregating** some of the building's functions—placing heavy machinery storage in an accessible zone like Stoneleigh Terrace, while locating staff facilities (WC, office, kitchenette) in an annex or reuse structure closer to the entrance or West compound.

This hybrid strategy avoids overburdening a single location, spreads operational use across already active nodes, and allows for more modest, contextual structures rather than a single overbearing insertion.

There is no operational imperative that necessitates the construction of the Gardeners' Building on the East Mound. The assumption that the Mound is the only viable location is unfounded, untested, and contradicted by multiple viable alternatives. Each of these alternative sites—whether through refurbishment, consolidation, peripheral siting, or modular intervention—would serve the needs of staff and cemetery management while **preserving the sacred, open, and ecologically sensitive qualities of the Mound**.

A responsible masterplan must begin with **fit-for-purpose siting**. We urge the Trust and Camden Council to revisit this question with honesty and imagination. To do otherwise is not only to risk planning failure—it is to risk lasting damage to the place, the people who care for it, and the principle of respectful heritage stewardship.

9. Procedural Failures and Grave Owner Exclusion

Among the most serious concerns surrounding the Gardeners' Building proposal is not simply what has been planned, but **how it has been planned**. Time and again, Mound grave owners have made clear that they were not informed, not included, and not respected during the development and consultation of this project. Their exclusion is not a peripheral detail—it strikes at the core of democratic planning, stakeholder trust, and the legal and moral duty of care owed to those who have laid their loved ones to rest at Highgate Cemetery.

The individuals most affected by this proposal—the families of the deceased whose graves lie directly adjacent to the Mound—were, by their own testimony, not made aware of the application until after the public consultation period had ended. This revelation is as disturbing as it is telling. Many learned of the project through informal channels: overheard conversations, concerned neighbours, or social media threads long after the statutory deadline had passed. It was not through the formal mechanisms of public notice, letter, or signage, as would be expected under proper procedure. This failure of communication is especially grave considering the unique nature of the stakeholder group: these are not casual members of the

public, but individuals who have made enduring commitments—financial, emotional, and generational—to this site.

For grave owners, the Cemetery is not a recreational space or a historic curiosity—it is, quite literally, **a site of continuing mourning**. Their relationship with it is unlike that of a casual visitor or heritage advocate. It is deeply personal and spiritual. To exclude them from a planning process that affects the daily and ritualistic use of that space is an affront to the very trust upon which cemeteries rely. It is not merely a breach of best practice. It is a breach of promise.

Adding insult to injury is the absence of any visible on-site signage during the consultation period. No notices were posted at the Mound itself or on the main access paths used by those who regularly visit its graves. In one of the most affected corners of the Cemetery, there was **no indication** that such a transformative development was under consideration. This omission is indefensible. Public notice cannot be deemed adequate when those most directly affected were denied even the most basic opportunity to see it. A planning application of this magnitude, with such profound impact on the visual, emotional, and functional character of an active burial site, should have warranted **direct notification, in-person consultation, and visible alerts** at the site itself. None were offered.

What emerges is a pattern not of oversight, but of **systemic exclusion**. Grave owners were not invited to pre-application workshops. They were not offered stakeholder briefings. Their lived experience was not sought out, and their needs were not accommodated. While much is made in the application documents of engagement with heritage bodies, design panels, and statutory consultees, there is an eerie silence where the voices of the grieving should be. They were treated not as collaborators in shaping the future of their sacred space, but as logistical obstacles to be managed or ignored.

In several cases, grave owners report that when they purchased their plots on the Mound—many in the last few years—they were explicitly told that the area was peaceful, protected, and would not be subject to future development. These assurances formed part of their decision-making. They buried parents, children, partners, and siblings under the belief that the setting would remain intact, dignified, and shielded from intrusion. The proposal to erect a two-storey utility building beside those graves represents not just an architectural shock, but a betrayal of that implicit covenant. That betrayal is compounded when the families in question were never consulted before plans were drawn.

These procedural failings are not simply ethical—they may also carry legal implications. Under the Town and Country Planning Act 1990, those materially affected by a planning application have the right to be informed and to respond. Where the proposal affects a grave site that is owned or leased, that person is not a bystander—they are a stakeholder. In this case, the absence of timely notification deprived grave owners of their statutory rights. That many were only able to lodge objections retroactively—through extraordinary effort and community coordination—suggests that the basic duties of the planning authority were not met.

There is also a potential conflict with Article 8 of the Human Rights Act, which enshrines the right to respect for private and family life. The act of mourning at a family grave is not a discretionary activity—it is a deeply held practice for many, forming part of their spiritual and cultural identity. The introduction of noise, shadowing, staff traffic, and mechanical disturbance into that space, without prior consultation or consent, represents an interference with that right. Where that interference is not proportionate, not justified by overwhelming public interest, and not subjected to transparent scrutiny, it risks becoming unlawful.

The failure to involve grave owners in the planning of a building that directly affects the use and dignity of their family plots has also caused a secondary harm—one of **trust erosion**. Many have expressed that their perception of the Friends of Highgate Cemetery Trust has been permanently altered. They speak of shock, disappointment, and disbelief—not just at the proposal, but at the sense of having been treated as afterthoughts. For an organisation that relies on public goodwill, volunteerism, and donor support, this erosion of trust is not incidental—it is foundational.

There is still no record of targeted listening exercises, grief-sensitive briefings, or even written acknowledgment of the emotional weight borne by those most affected. The process thus far has privileged architectural coherence and masterplanning ambition over human connection and ritual continuity. But a cemetery is not a masterplan—it is a network of personal stories, spiritual investments, and acts of remembrance. To plan its future without the voices of those who mourn there is to build upon fractured ground.

This proposal, in its current form, cannot be separated from the way it has been conceived and communicated. The exclusion of grave owners from its development renders it procedurally and morally unsound. Camden Council must recognise that a planning process built on omission and silence is not a legitimate foundation for development—especially on ground as sacred as this.

10. Mischaracterisation and Misrepresentation

At the heart of this objection lies not only concern for what has been proposed, but for **how it has been presented**. The planning documents submitted in support of the Gardeners' Building are marked by repeated instances of mischaracterisation —of the building's form, its impact, its setting, and even its identity. These distortions are not incidental; they are fundamental to how the application seeks to justify a structure that would otherwise appear incongruous and unacceptable within a sacred, protected landscape.

One of the most pervasive mischaracterisations is the repeated reference to the Gardeners' Building as a **"garden wall"**. This phrase appears throughout the Design and Access Statement and related planning materials, and is clearly intended to frame the proposal as modest, low-impact, and consistent with the Cemetery's existing landscape language. But this is a rhetorical sleight of hand. The proposed structure is not a wall. It is a **two-storey, 25.5-metre-long building**, comprising garage bays, staff offices, showers, toilets, storage workshops, and a publicly accessible terrace. Its design includes metal grilles, vertical-lift gates, concrete façades, and glazed doors—elements more reminiscent of a depot or a civic utility block than any garden wall found in Highgate Cemetery or any other comparable site.

This linguistic misrepresentation matters. By framing the building in diminutive terms, the applicant diminishes its perceived impact and misleads both planners and the public about the scale and presence of the structure. A "wall" implies continuity, boundary, passivity. This building is none of those things. It introduces a new, visually assertive, and operationally intensive presence into a previously tranquil, green embankment. The term serves to obscure rather than clarify, and undermines the integrity of the application process.

The misrepresentation extends beyond language and into **visual depiction**. The renderings, diagrams, and photomontages included in the application materials systematically underplay the building's height, mass, and proximity to graves and key pedestrian paths. Several images rely on **wide-angle perspectives, oversized human figures, or unrealistic landscaping**, all of which serve to scale down the apparent impact of the structure.

Independent analyses of these visuals—such as those in the Appendix—reveal striking discrepancies between the represented and actual scale relationships. Measured drawings show that the building rises **over 7.8 metres** from the lower path—higher than the colonnade at the West Cemetery entrance—and looms **5 metres above the level of the Mound itself**. These are not trivial dimensions. They materially affect the skyline, the experience of space, and the emotional tenor of the burial zone. Yet nowhere in the submitted application is this dominance clearly conveyed or acknowledged. The absence of comparative sectional drawings, verified photomontages, or user-perspective visuals renders the documentation incomplete at best, misleading at worst.

There is also a broader misrepresentation at work in how the proposal characterises the Mound itself. In various sections of the Design and Access Statement, the Mound is described as "underused," "remote," or "non-sensitive"—terms that are plainly contradicted by reality. The Mound contains numerous **active grave plots**, many of which are tended weekly by bereaved families. It is one of the Cemetery's most sunlit, ecologically diverse, and emotionally

resonant areas. To describe it as expendable or underutilised is to erase the lived experience of those who grieve there. It is a characterisation that reveals more about the proposal's priorities than about the site itself.

This misreading of the site's emotional and ecological significance is further compounded by the suggestion that the building will enhance or "activate" the space. In truth, the presence of a garage, a workshop, and a staff facility above and beside graves does not enrich the Mound's contemplative function. It imposes new activity—movement, machinery, noise—into a space currently defined by stillness, softness, and solemnity. It does not enhance, it displaces. To claim otherwise is to recast intrusion as improvement, a fundamental inversion of values in a site of mourning.

The public consultation process has also been subject to distortion in how it is represented. Statements in the application suggest broad support or general approval from the community. Yet the overwhelming number of objections submitted since the application's publication—many from grave owners who had not even been informed of the proposal—tell a very different story. There is no evidence of widespread community endorsement for this building in this location. To imply consensus where dissent has been overwhelming is to mischaracterise the public response and mislead the decision-making authority.

These cumulative distortions—linguistic, visual, contextual, procedural—call into question the transparency of the application and the soundness of its claims. They also place an unfair burden on the public, who must expend considerable time, expertise, and emotional energy to correct the record. Planning decisions must be based on clear, honest, and faithful representations of what is proposed and how it will affect the site and its users. In this case, the representations provided fall short of that standard.

This is not simply a matter of better graphics or phrasing. It is a question of integrity. The Trust and its consultants have a duty not only to design responsibly, but to communicate honestly. The mischaracterisation of the Gardeners' Building undermines that duty. It casts doubt on the proposal's underlying justifications and erodes confidence in the process. Camden Council must take seriously the responsibility to ensure that decisions affecting one of London's most sacred and sensitive landscapes are based on full and accurate information—not on softened language and strategically framed visuals.

11. Cumulative Harm and Loss of Trust

The damage posed by the proposed Gardeners' Building cannot be assessed in isolation. Its impact must be understood as cumulative—layering architectural overreach, emotional violation, ecological disruption, and procedural mismanagement into a single, concentrated rupture in the life of Highgate Cemetery. While each individual objection may point to a specific harm—visual intrusion, shadowing, path restriction, or noise—their combined effect is far greater than the sum of their parts. Together, they signal a profound breakdown in the delicate balance between operational need and sacred space, between visionary renewal and respectful restraint.

The insertion of a building of this scale and function into a part of the Cemetery defined by openness, light, biodiversity, and reflection creates a shock to the landscape. It interrupts the visual logic of the site, reorders circulation patterns, and casts a literal and symbolic shadow over a highly sensitive area. The Mound, once defined by its quiet slope and ecological vitality, becomes a site of surveillance and activity. What was once an open margin becomes an institutional edge. The gradual transition from woodland to burial terrace is severed by a concrete barrier.

Yet more enduring than the structural harm is the emotional and relational harm it produces. Families who chose this corner of the Cemetery for their loved ones did so with the clear expectation that it was a place of peace—buffered from the active infrastructure of cemetery management. Many now feel that expectation has been violated, not by time or nature, but by the very institution charged with stewardship of their trust. That wound runs deep. It is not simply frustration over an ill-considered design, but heartbreak at the feeling of having been

misled. It is one thing to grieve; it is another to do so under the shadow of a building that tells you your grief must now coexist with utility and convenience.

This loss of trust is not theoretical—it is palpable in the voices of the grave owners who write of betrayal, sorrow, and disbelief. They write not as agitators but as protectors of a relationship they believed was permanent. That relationship, between the mourner and the Cemetery, has been slowly but unmistakably eroded. And when trust is lost in such a space, it does not simply damage one application—it unravels the integrity of the entire landscape.

What is perhaps most painful is that this rupture was avoidable. The Cemetery's masterplan is, in many other respects, a thoughtful and ambitious proposal. It offers solutions to long-standing accessibility and conservation issues, it celebrates the site's layered identity, and it envisions a future of sustainability and dignity. But the inclusion of the Gardeners' Building in this particular location, in this particular form, undermines that vision. It becomes the one note that throws the whole harmony into question. It speaks not of care, but of compromise. Not of listening, but of imposition.

By pushing this building forward despite its evident and compounding harms, the Trust risks damaging its own reputation as a careful custodian of one of London's most cherished landscapes. It invites not only community resistance, but reputational fallout—among donors, supporters, and heritage bodies who expect better. What trust remains is fragile, and approval of this proposal in its current form would likely destroy it altogether. Once lost, it will not return easily.

There is also the matter of precedent. Highgate is not just a cemetery—it is a symbol. How it is treated sets a standard for how other historic cemeteries may be treated in future. To insert a multi-use, two-storey staff facility next to active graves under the guise of “sensitive integration” would establish a dangerous precedent across the sector. It would suggest that operational convenience can supersede sanctity. That mourners can be out-prioritised. That architectural visibility is a fair price for institutional ambition. This is not the direction a conservation-led institution should be leading.

If built, this building will not quietly recede. Its presence will continue to echo through daily maintenance routines, through obstructed views, through the experience of every mourner who returns to find their space altered. And with every echo, the story will be reinforced: that it was not necessity that placed this building here, but a choice. A choice to override caution. A choice to diminish a space that should have remained undisturbed. A choice that will be seen, heard, and felt by those who mourn for generations to come.

12. Conclusion and Recommendation

The proposal for the Gardeners' Building on the East Mound of Highgate Cemetery is, at its core, a well-intended misstep—an attempt to solve an operational problem through a solution that fails to honour the layered complexity, emotional gravity, and historic sensitivity of its setting. While we acknowledge the broader vision for the Cemetery's renewal, this particular insertion is misjudged in purpose, misrepresented in presentation, and misplaced in position. The consequences of allowing it to proceed would be deep, enduring, and, in many cases, irreversible.

The East Mound is not a blank slate. It is not spare land, a gap in the Cemetery's logic, or an underutilised slope. It is a living memorial landscape, where recently buried individuals lie beneath wildflower slopes and sunlight, where families return to grieve, plant, tend, and remember. It is a place where space, light, silence, and sky are part of the ritual of mourning. The construction of a two-storey service building in this space cannot be mitigated by materials, softened by planting, or justified through convenience. It changes the Mound forever—visually, experientially, and symbolically.

This proposal brings harm in multiple dimensions. It undermines the visual openness and ecological richness of the slope. It shadows active graves. It introduces operational noise and activity into what was a contemplative sanctuary. It compromises safe access routes during

construction and future burials. It disregards grave owners' expectations and experiences, bypassing meaningful engagement in favour of top-down planning. And it does all of this despite the existence of credible alternatives—locations elsewhere in the Cemetery that could accommodate these functions without desecrating a sacred landscape.

The problem here is not just one of design. It is one of principle. It is about how we value sacred space, how we honour those who grieve, and how we choose to plan in sites where the past and present must coexist with care. Highgate Cemetery is a place of memory, not of expedience. It demands an architectural language of deference, not assertion. And it requires a planning process that listens, respects, and protects—not one that rationalises, overrides, and imposes.

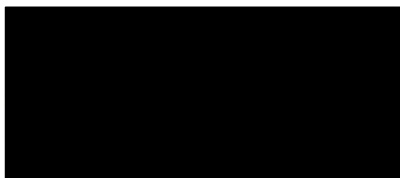
To approve this application in its current form would be to send a clear message: that operational ambition now outweighs emotional experience; that the logic of the masterplan is more important than the sanctity of the site; that families who trusted in the peace of their burial plots are no longer considered key stakeholders in their future.

We urge Camden Council to reject this part of the application, not as an act of opposition to change, but as an act of respect—for the mourners, for the landscape, and for the legacy of Highgate Cemetery itself. We ask that the Trust revisit this proposal with humility, and that it initiate a transparent, collaborative co-design process with those most affected.

There is still time to correct this course. There is still a chance to reaffirm trust, to preserve the Mound, and to find an architectural and operational solution that meets the Cemetery's needs without sacrificing its soul. A revised scheme, properly sited and sensitively scaled, would not only avoid harm—it would restore faith in the project's intent and bring communities back into alignment around a shared vision.

The Cemetery deserves that care. The families who visit daily deserve that respect. And the legacy of this extraordinary landscape demands nothing less.

Yours sincerely

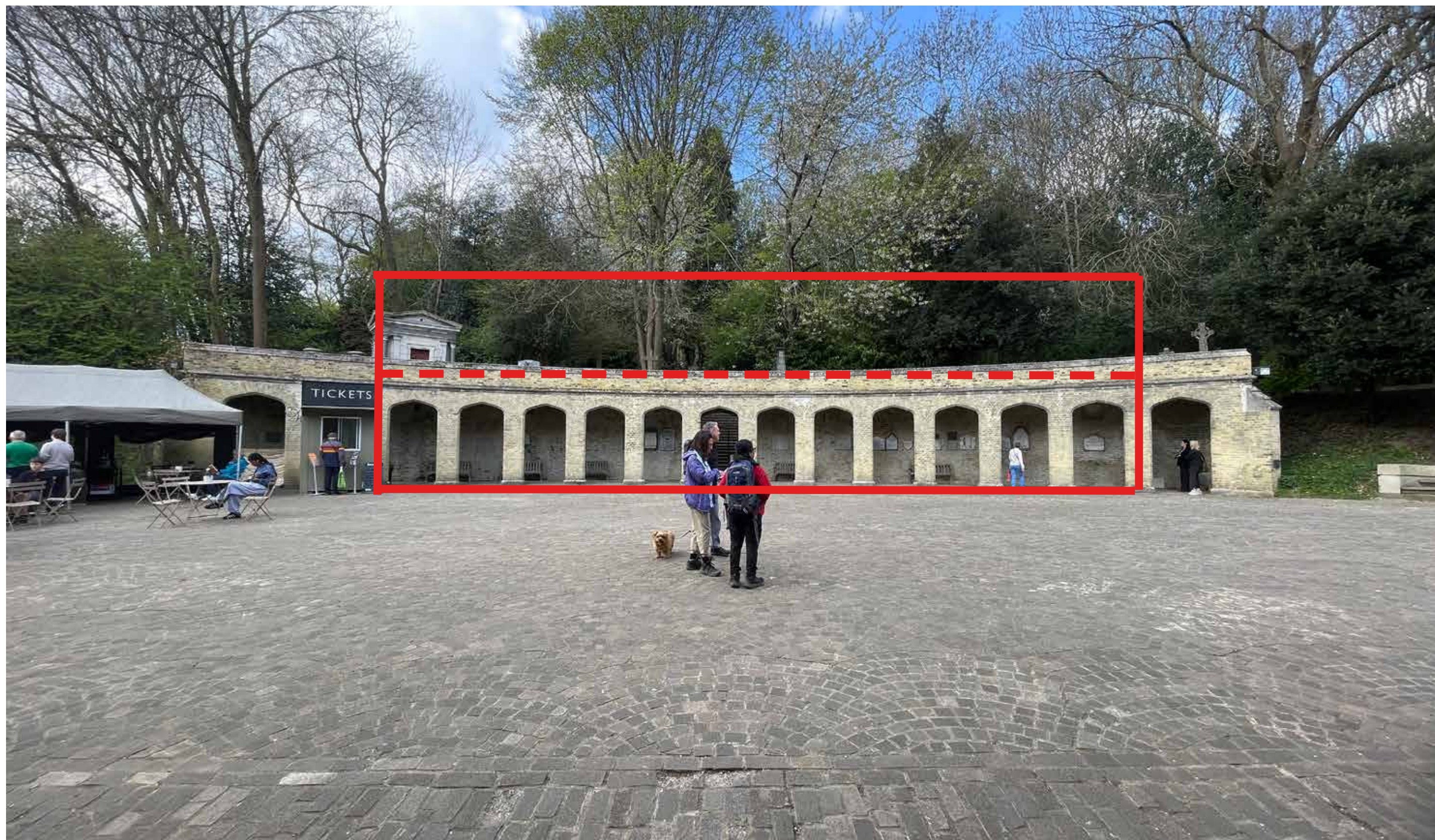


Amir Sanei
MA(hons) AAdipl(hons) ARB, RIBA, RIAS

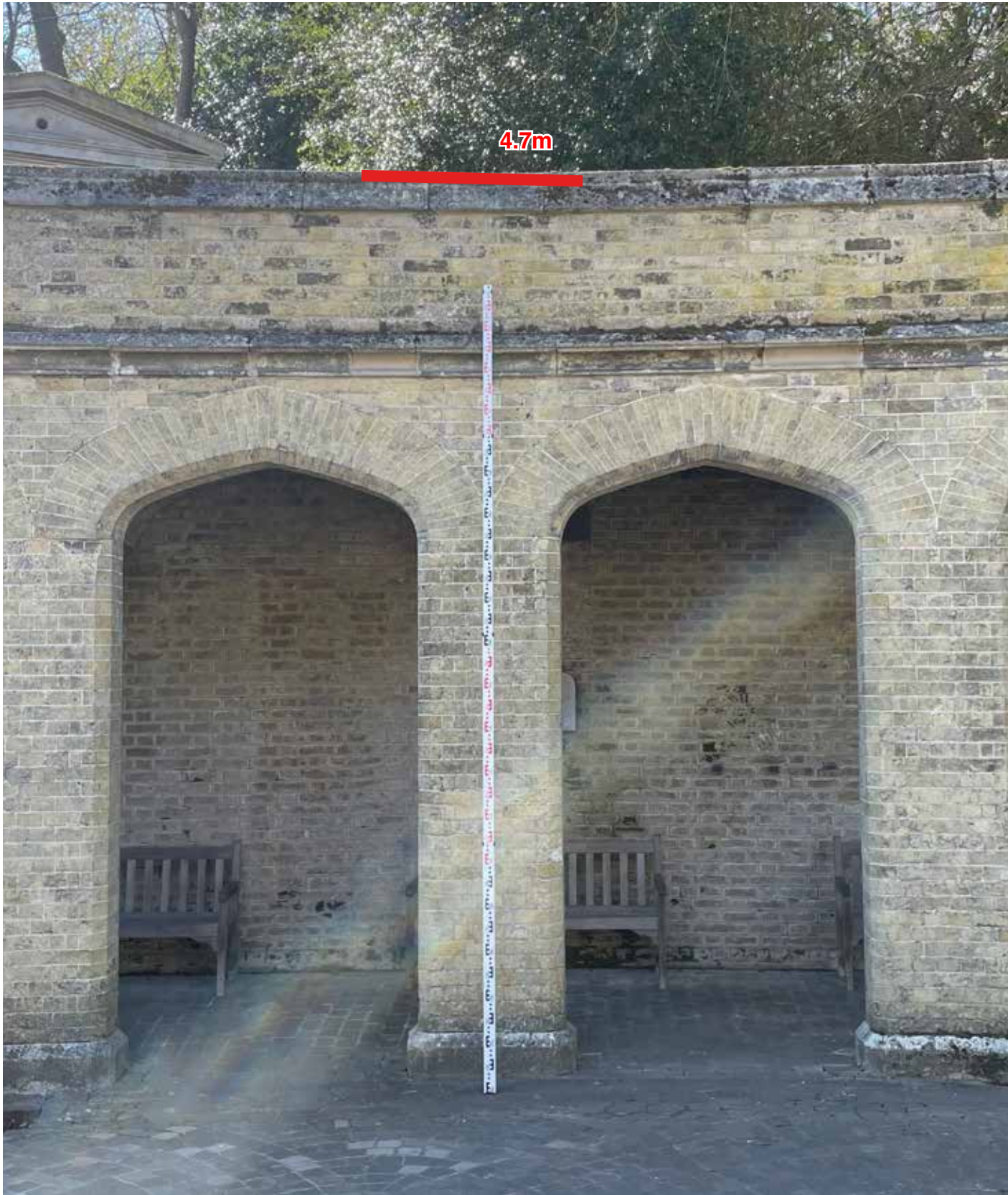
HIGHGATE CEMETERY

Objections on Submitted Proposals for a Gardeners Building

SCALE OF GARDEN BUILDING COMPARED WITH THE COLONADE. DOTTED LINE IS HEIGHT OF THE FIRST FLOOR AS SEEN FROM THE MOUND SIDE



HEIGHT OF THE TOP SECTION OF THE GARDEN BUILDING
AT IT'S TALLEST POINT FROM THE MOUND LEVEL
COMPARED WITH THE COLONADE HEIGHT

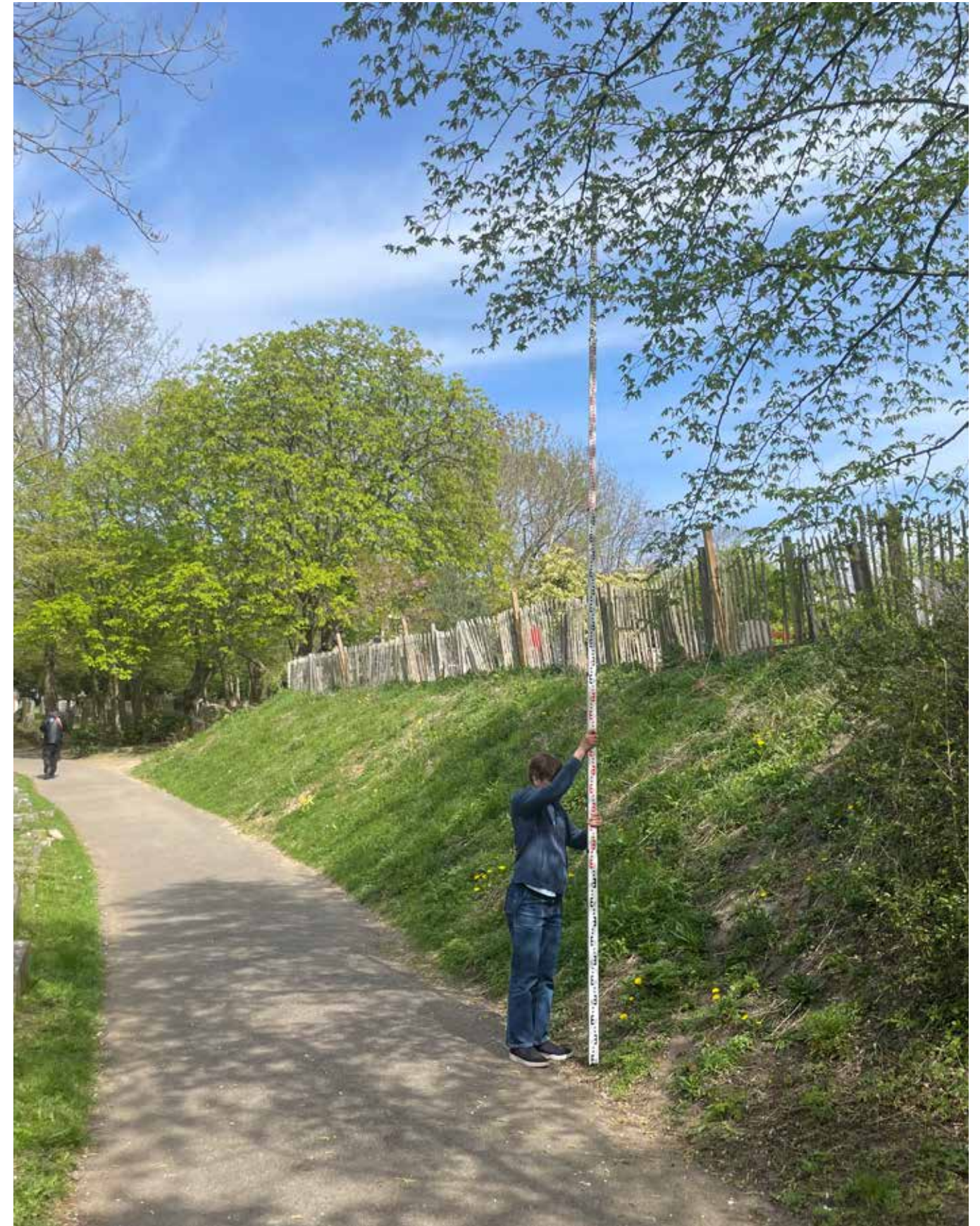


HEIGHT OF THE TOP SECTION OF THE GARDEN BUILDING
AT IT'S LOWEST POINT FROM THE MOUND LEVEL
COMPARED WITH THE COLONADE HEIGHT

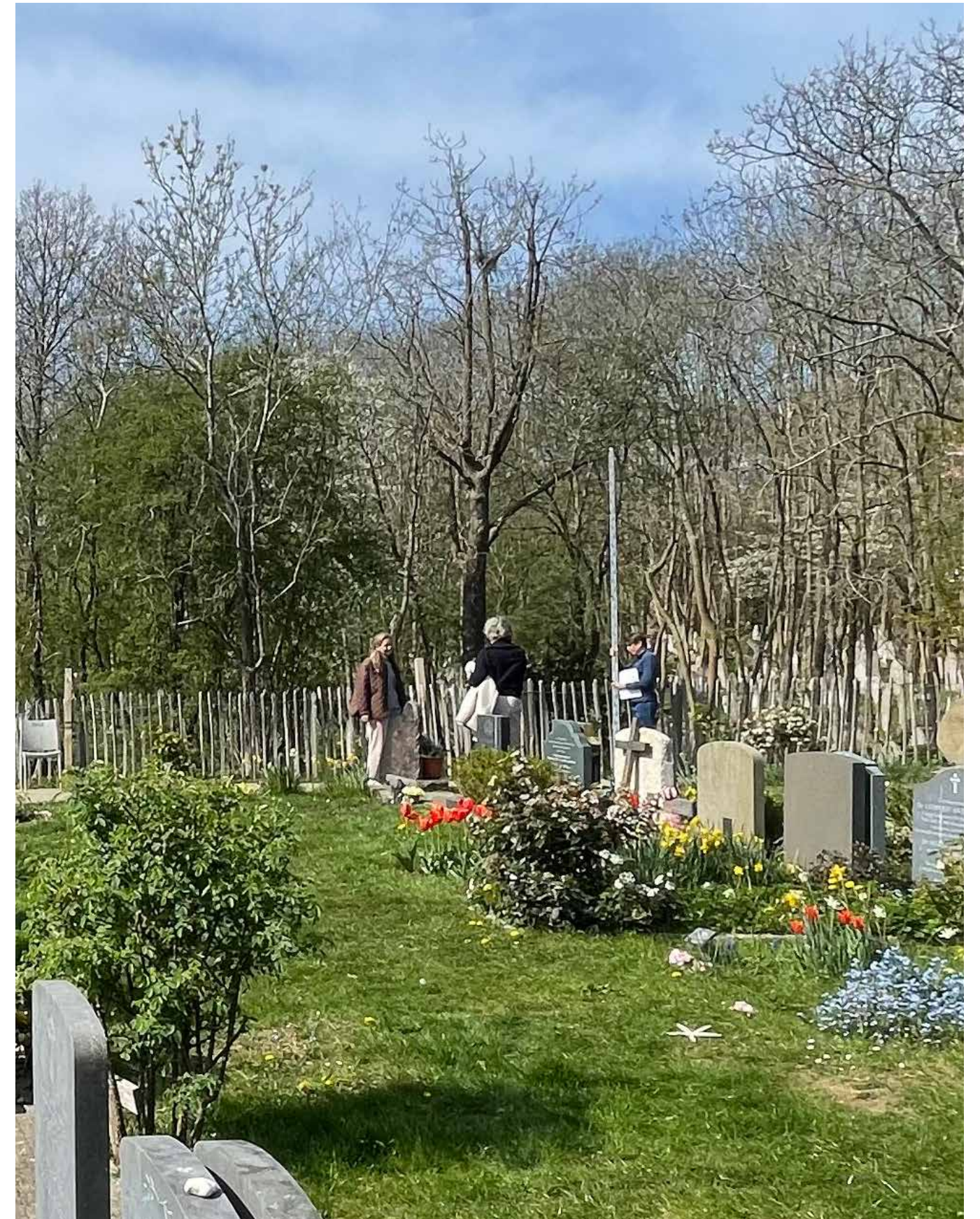
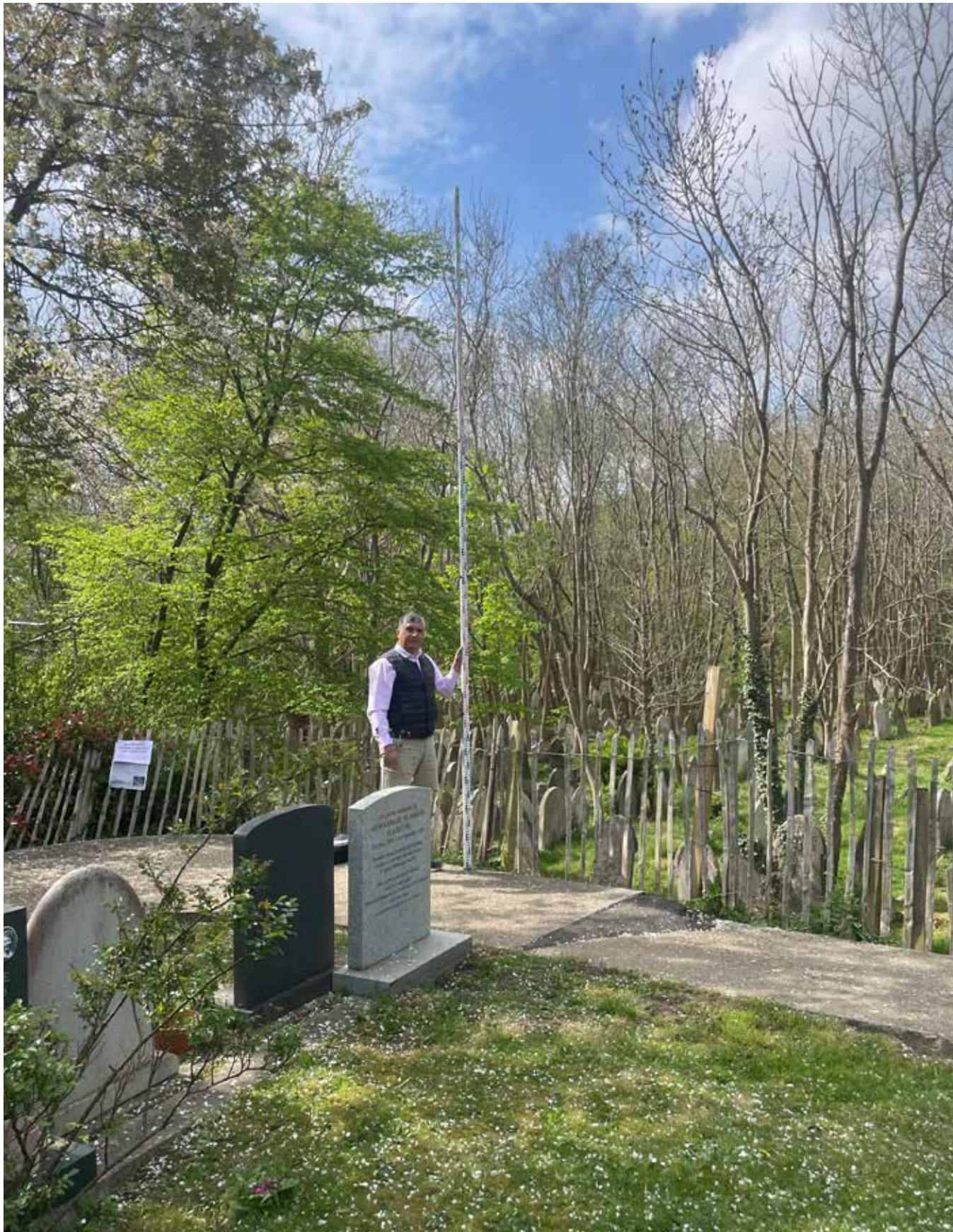


PROPOSED PLAN

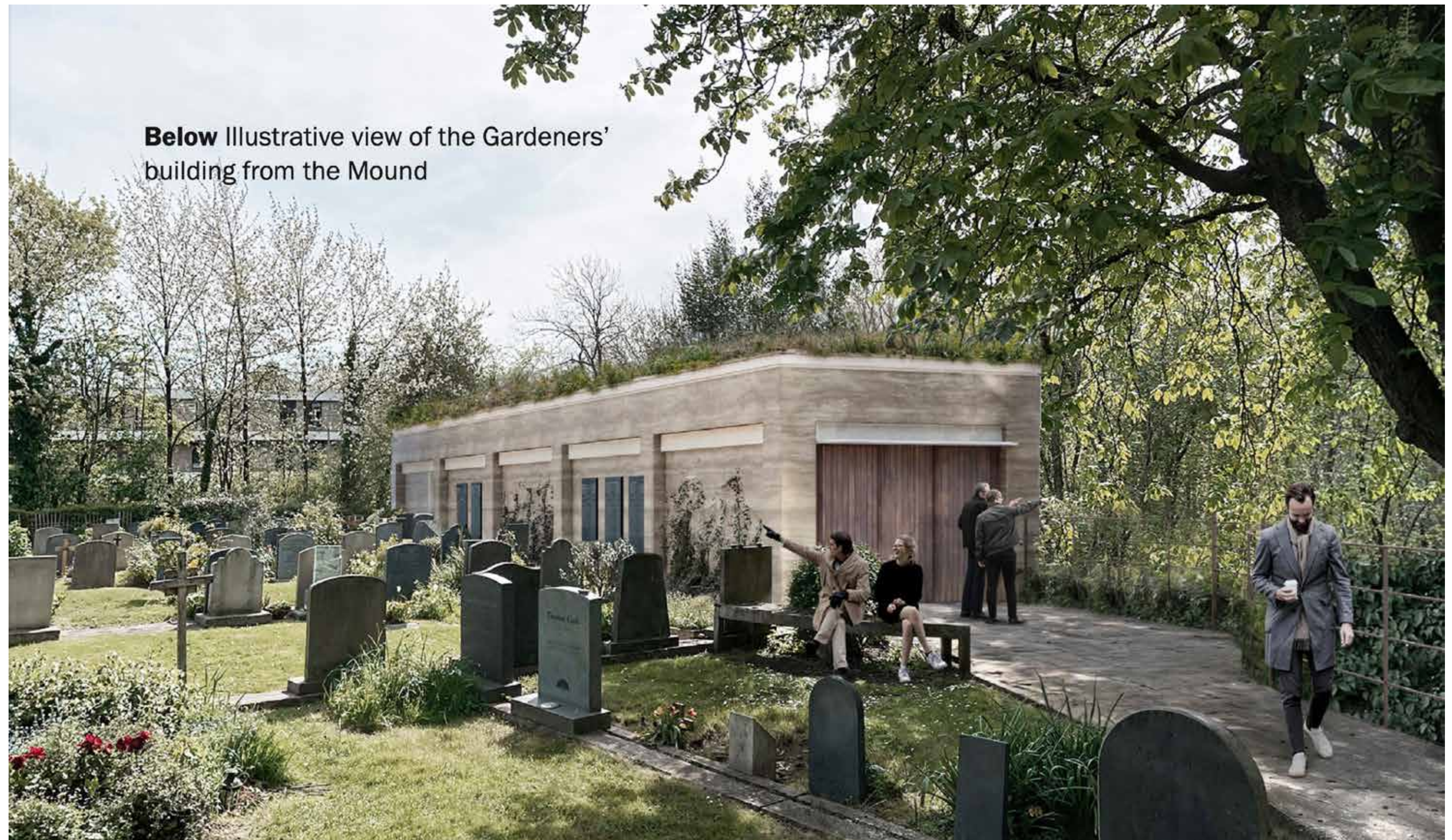
GARDEN BUILDING AS SEEN FROM THE MAIN PATH



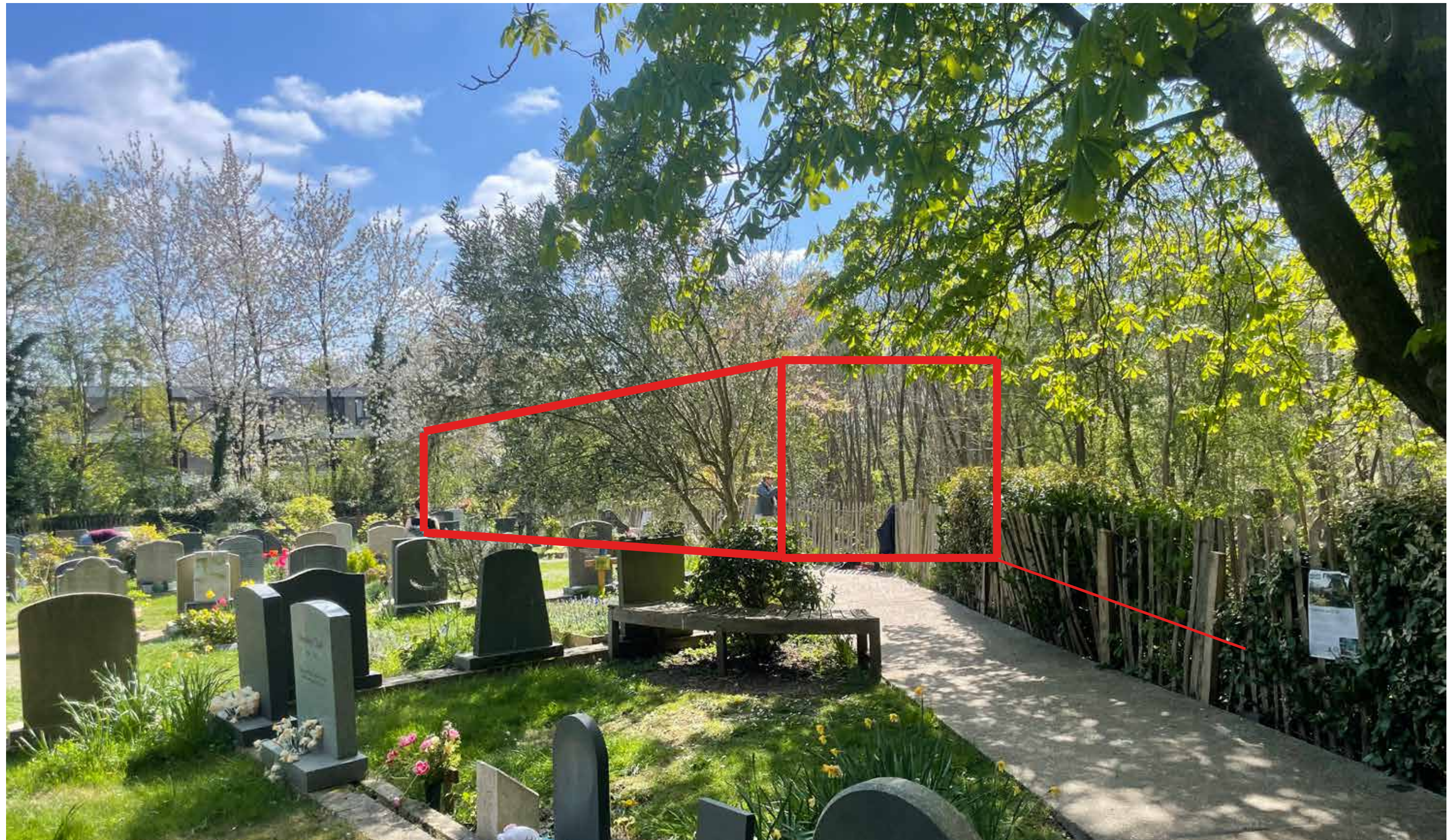
GARDEN BUILDING AS SEEN FROM THE MOUND



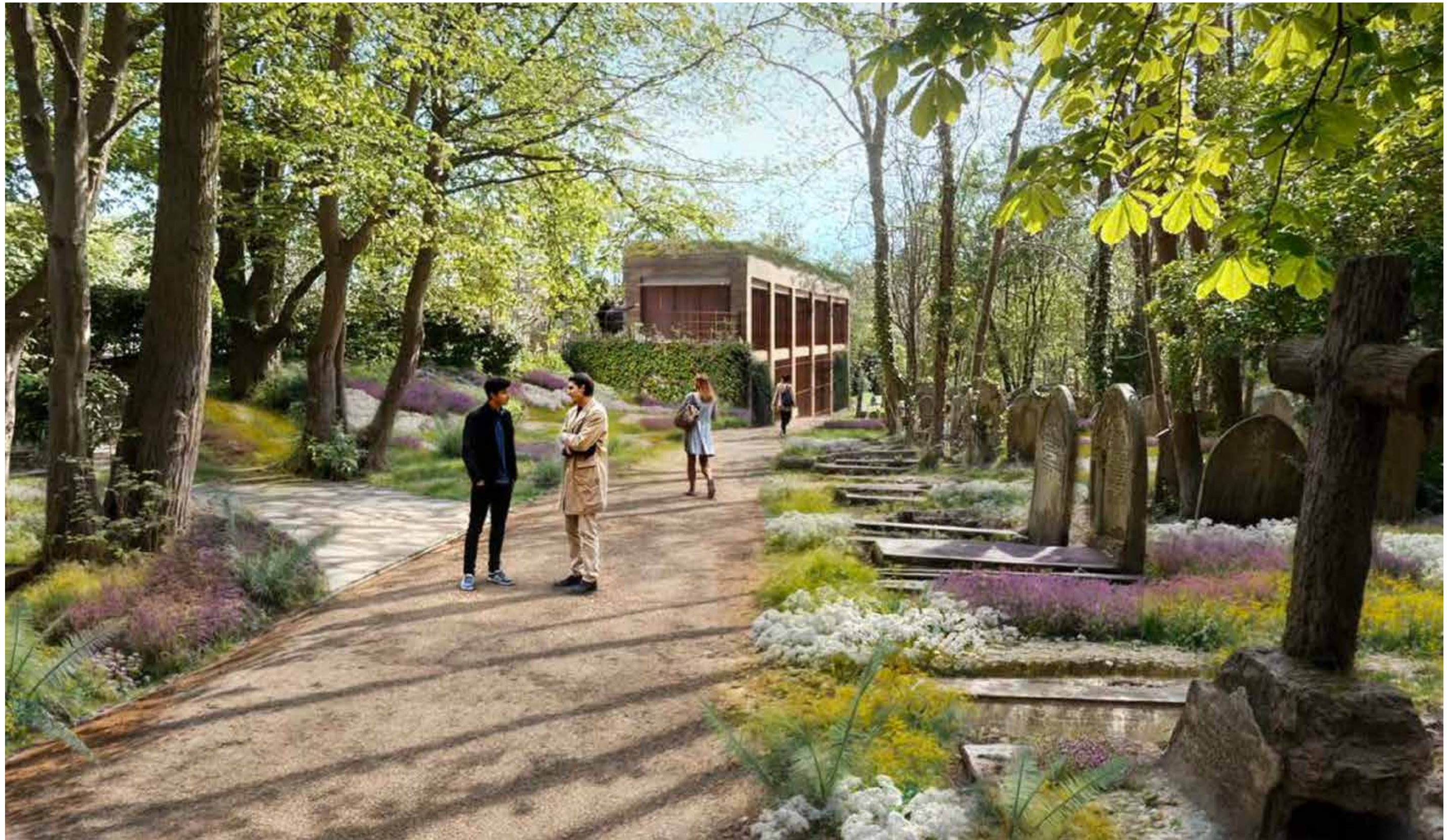
PUBLISHED PHOTOMONTAGE IS MORE OF AN IMPRESSION. POSITIONING OF BUILDING NOT ACCURATE AND GIANT PEOPLE GIVE A FALSE IMPRESSION OF THE SCALE OF THE BUILDING



OUTLINE OF BUILDING AS SEEN FROM THE END OF THE PATH ON THE MOUND WITH PERSON AT THE RIGHT SCALE



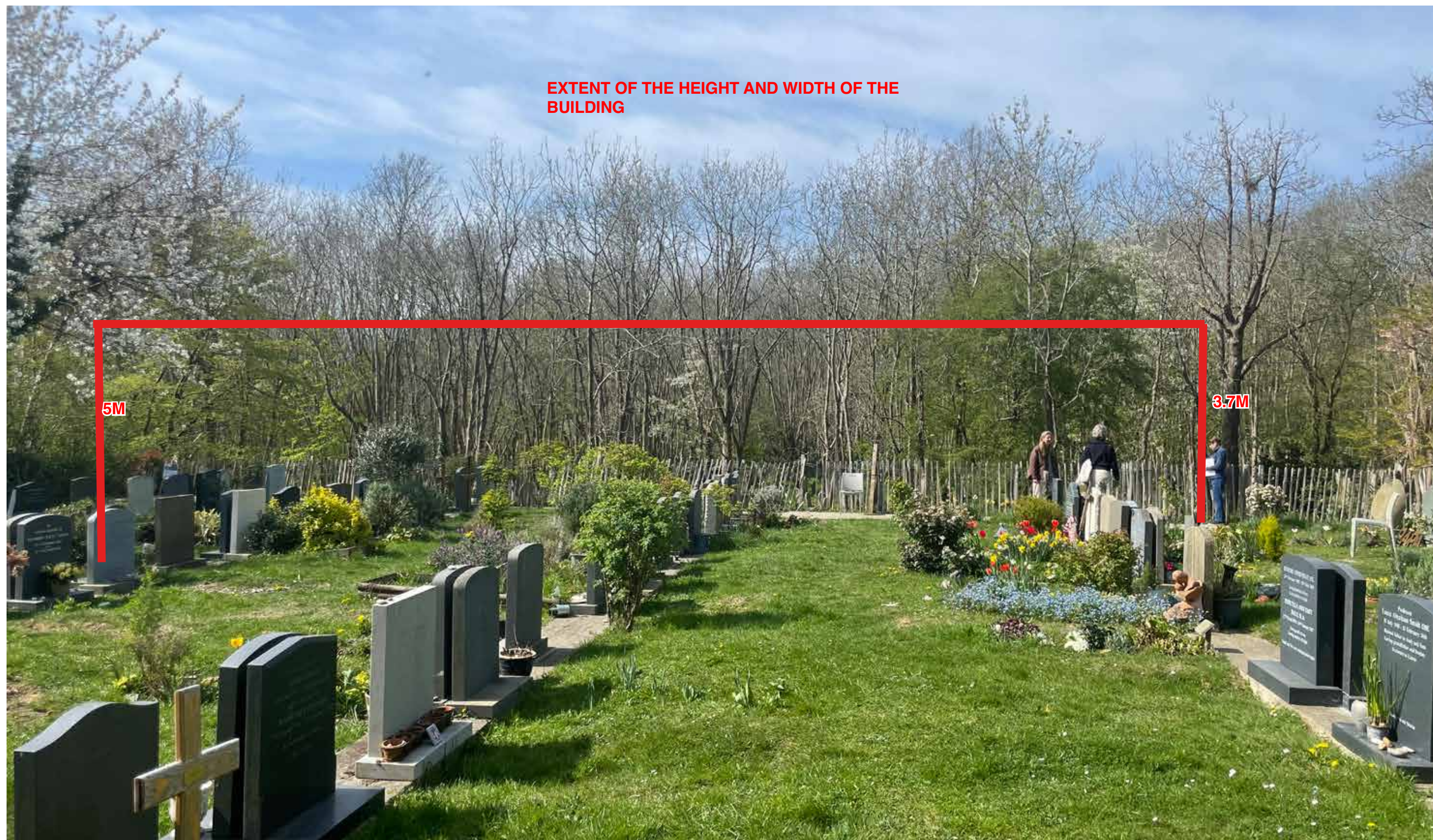
PUBLISHED PHOTOMONTAGE IS MORE OF AN IMPRESSION THAN AN ACCURATE REPRESENTATION OF THE SCALE OF THE PROPOSED GARDEN BUILDING



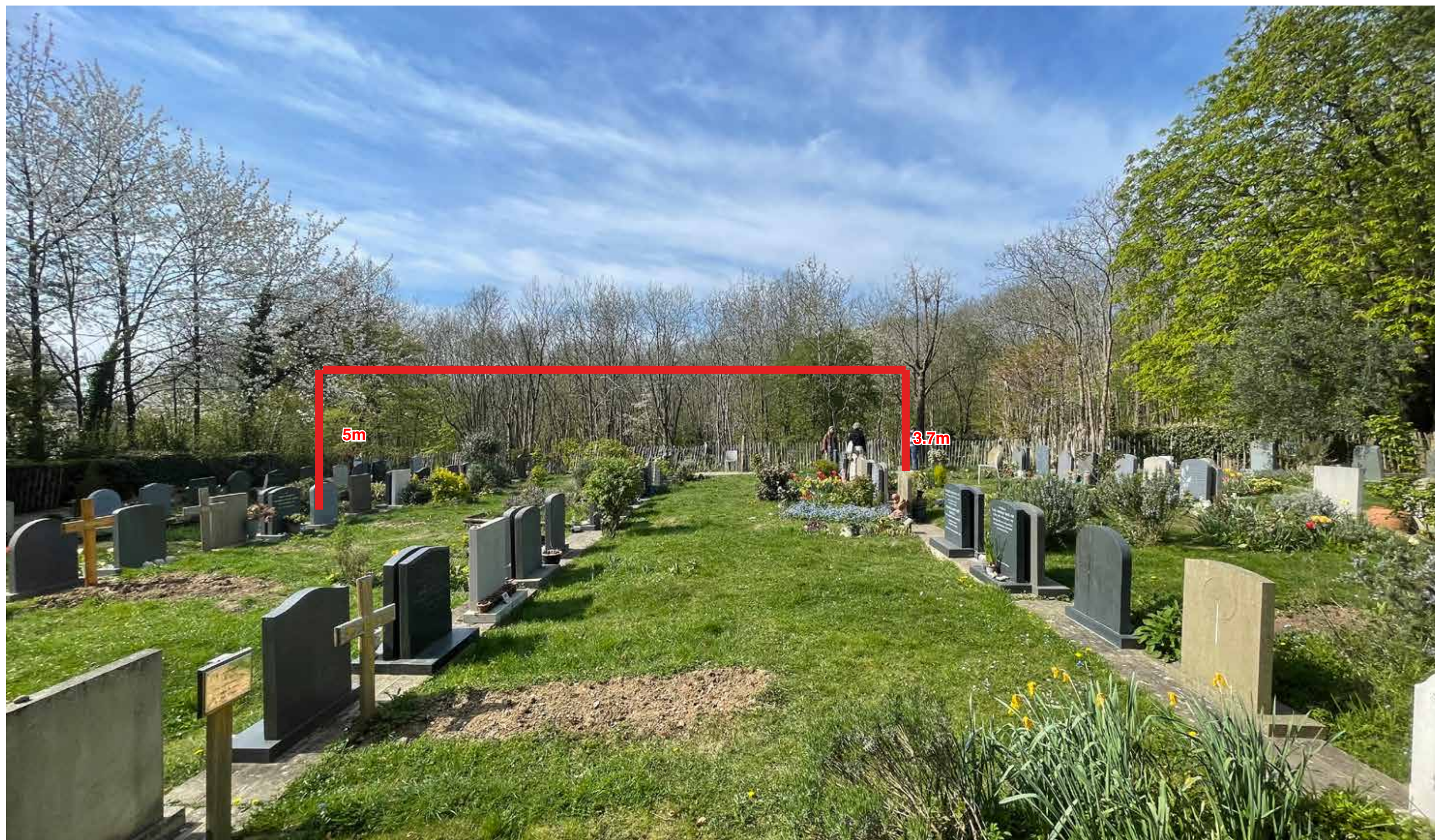
OUTLINE OF BUILDING AS SEEN FROM NEAR THE RAMP ACCESS TO THE MOUND



PROPOSED GARDENERS BUILDING OUTLINE FROM THE MOUND



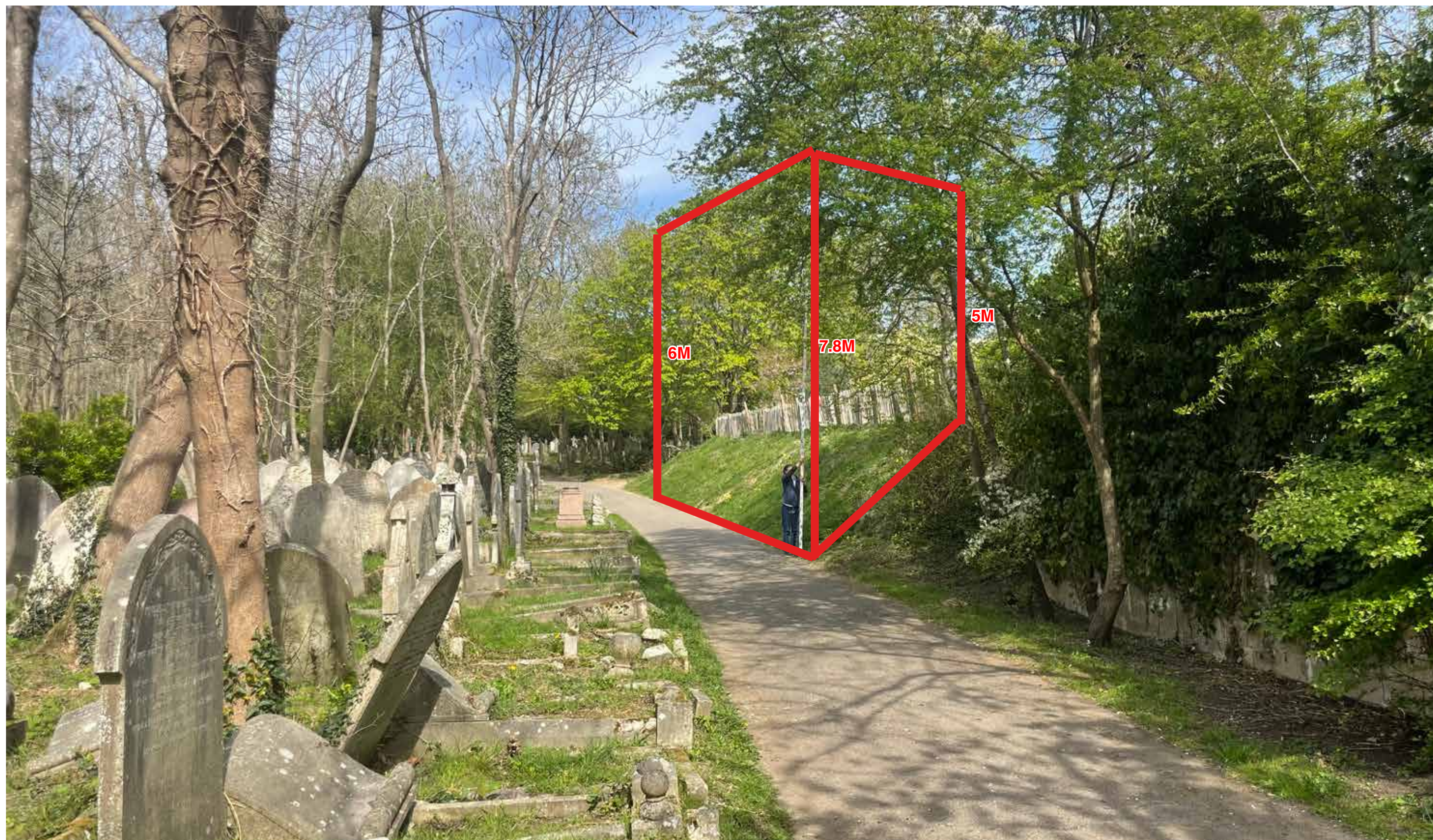
PROPOSED GARDENERS BUILDING OUTLINE FROM THE MOUND (UNREALISTIC EXTRA WIDE ANGLE)



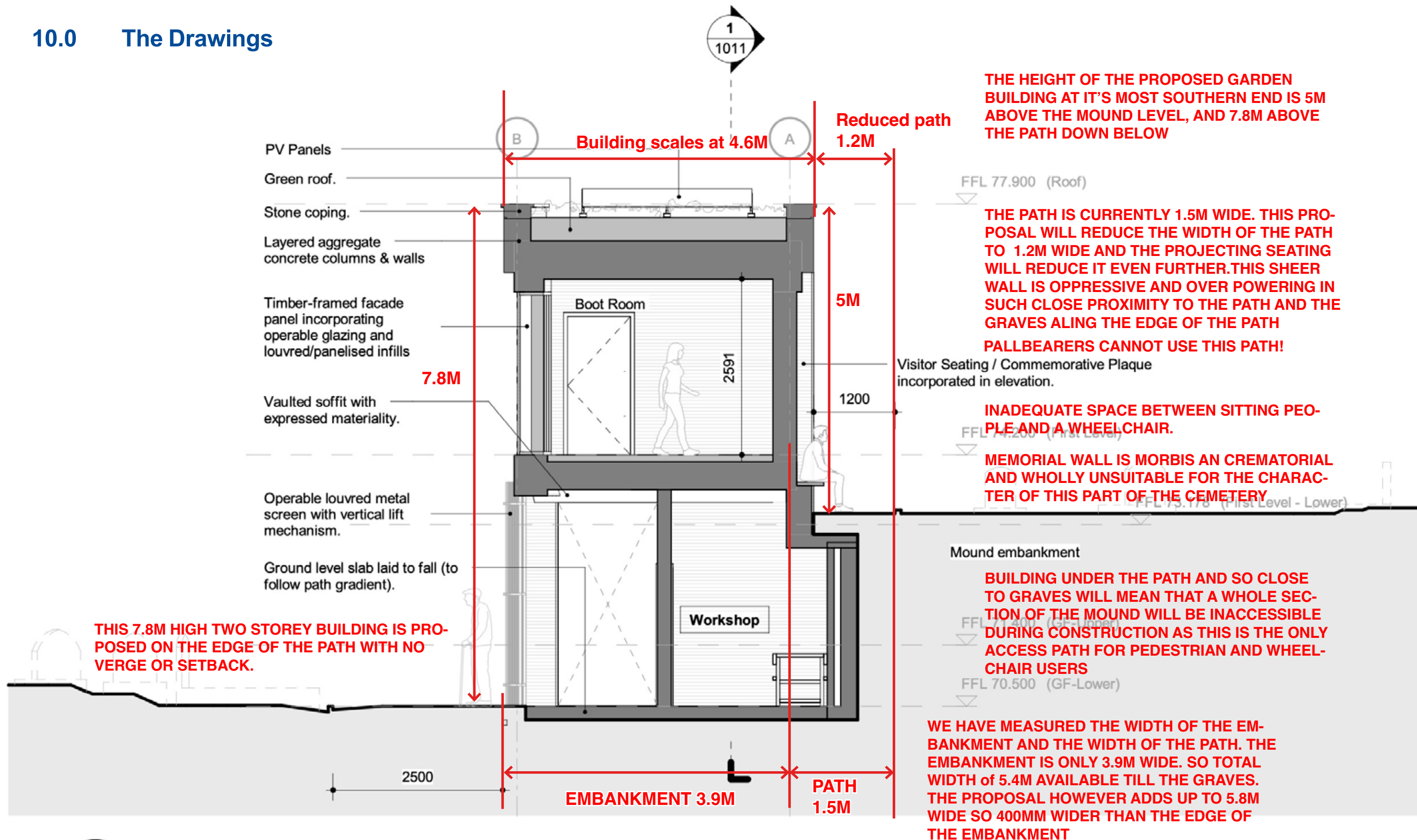
GARDEN BUILDING AS SEEN FROM THE CEMETERY BLOCKING ANY SENSE OF OPENNESS

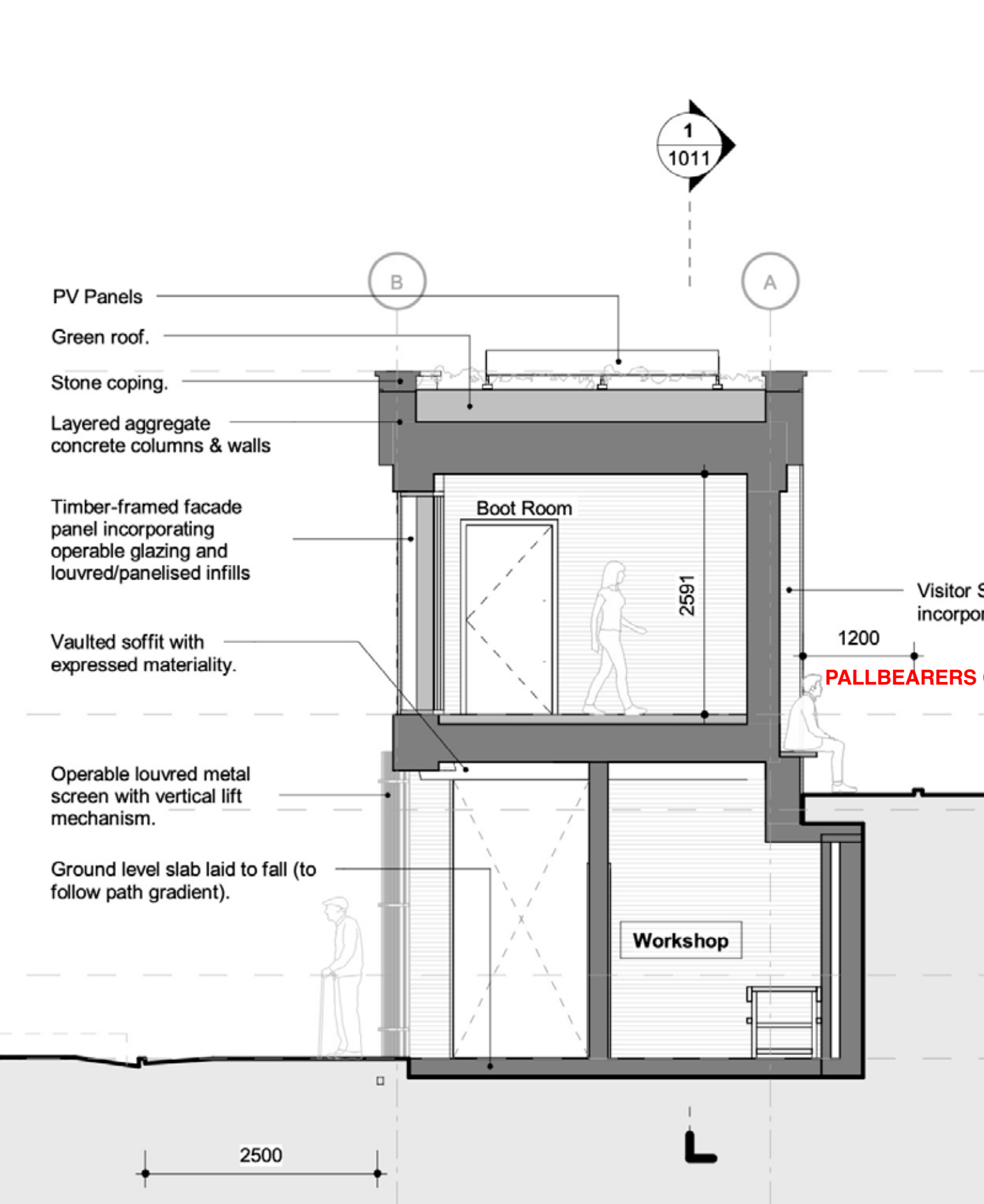


GARDEN BUILDING AS SEEN FROM THE PATH. SHEER 7.8M HIGH FACADE WITH NO SET BACK.



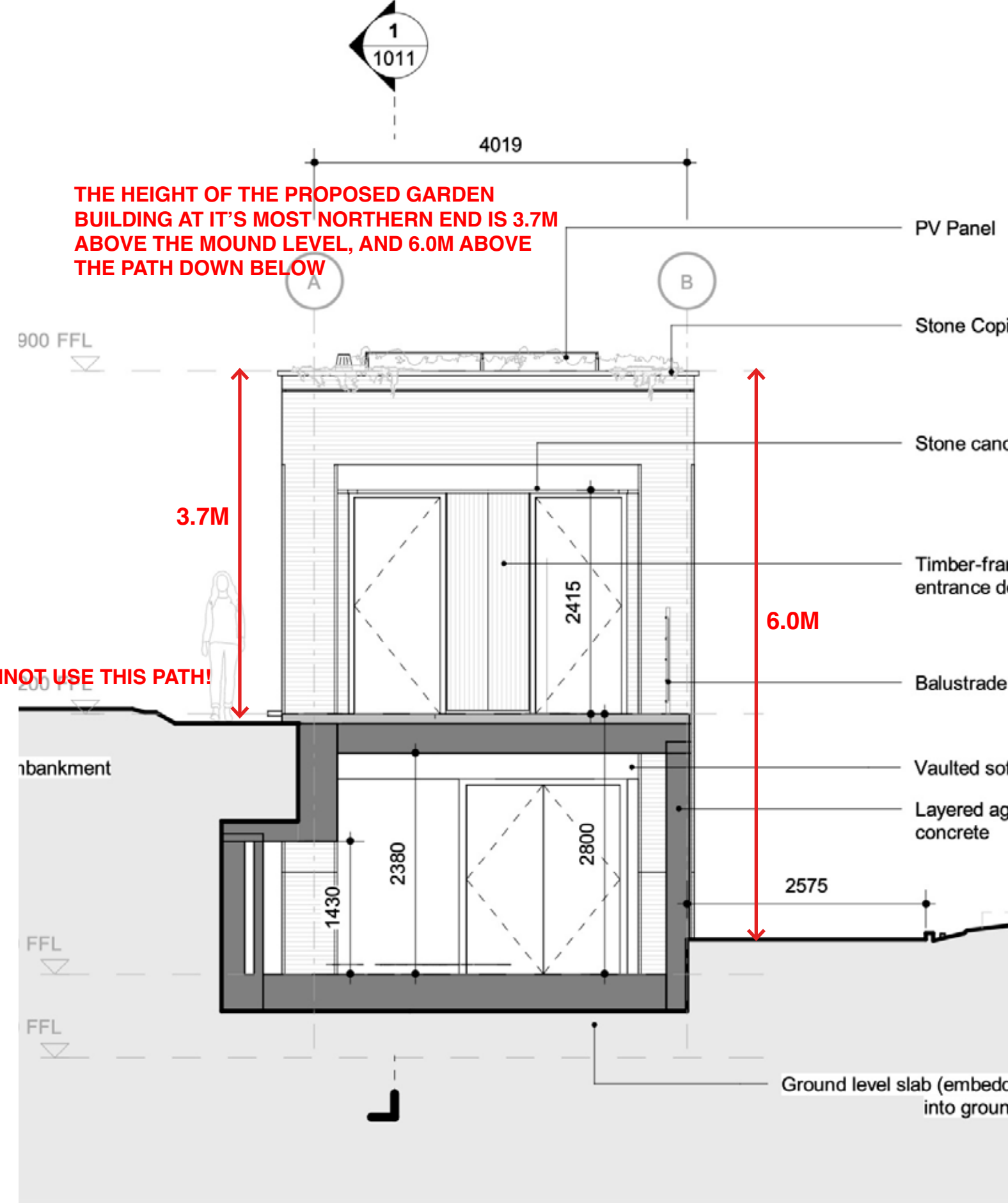
10.0 The Drawings





Section - Workshop

Gardeners' Building



Gardeners' Building

THE PROPOSED GARDENERS BUILDING REQUIRES THE REBUILDING OF THE PATH TO A NEW WIDTH AND GEOMETRY. CURRENT PATH IS 1.5M WIDE AND THE PROPOSAL WILL REDUCE THE WIDTH TO 1.09M

THE BUILDING DOES NOT FIT THE CONSTRAINTS OF THE MOUND. THE MOUND IS ONLY 3.9M DEEP.

0.85M

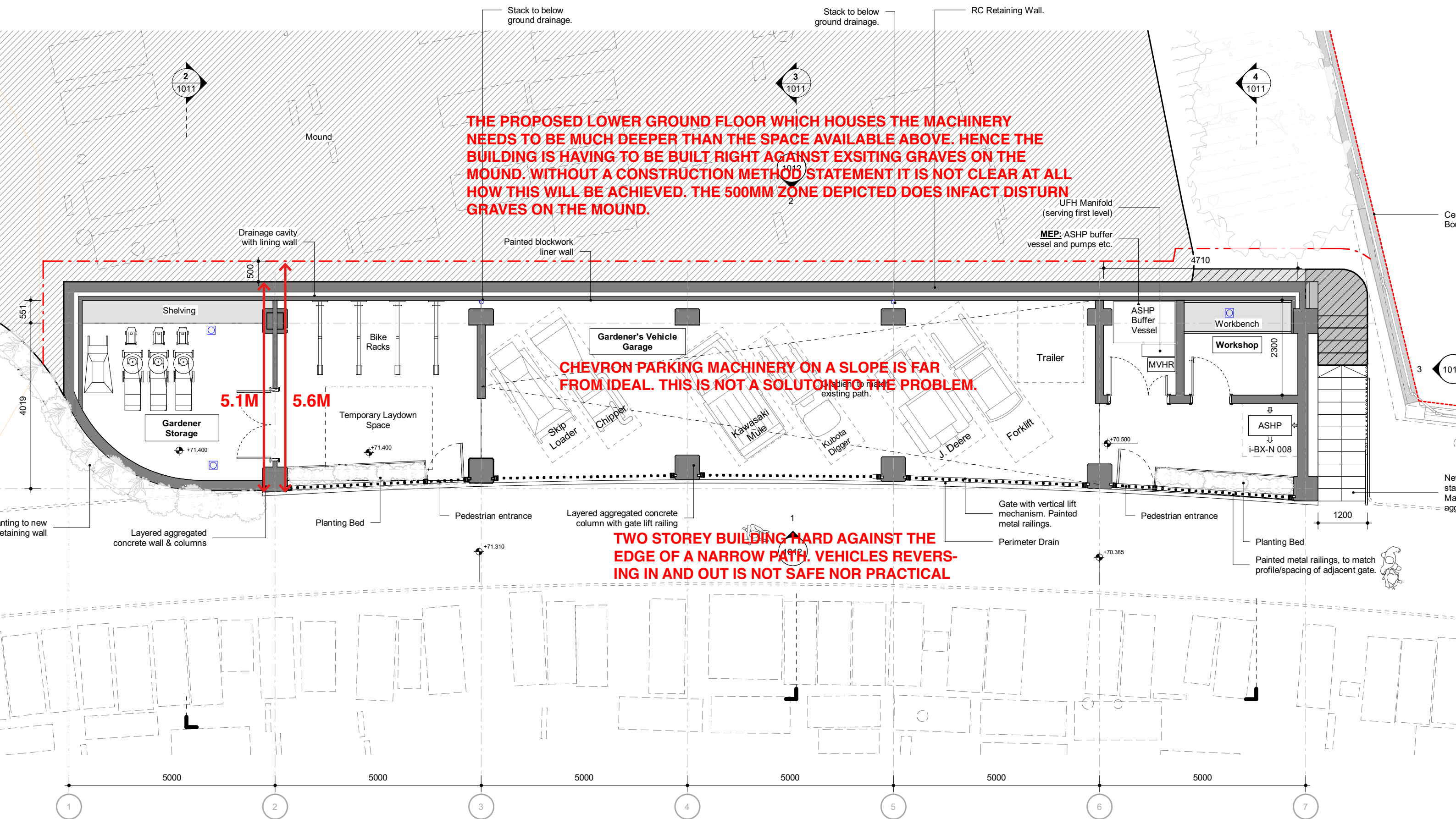
1.5M

1.09M

PALLBEARERS CANNOT USE THIS PATH!

T314

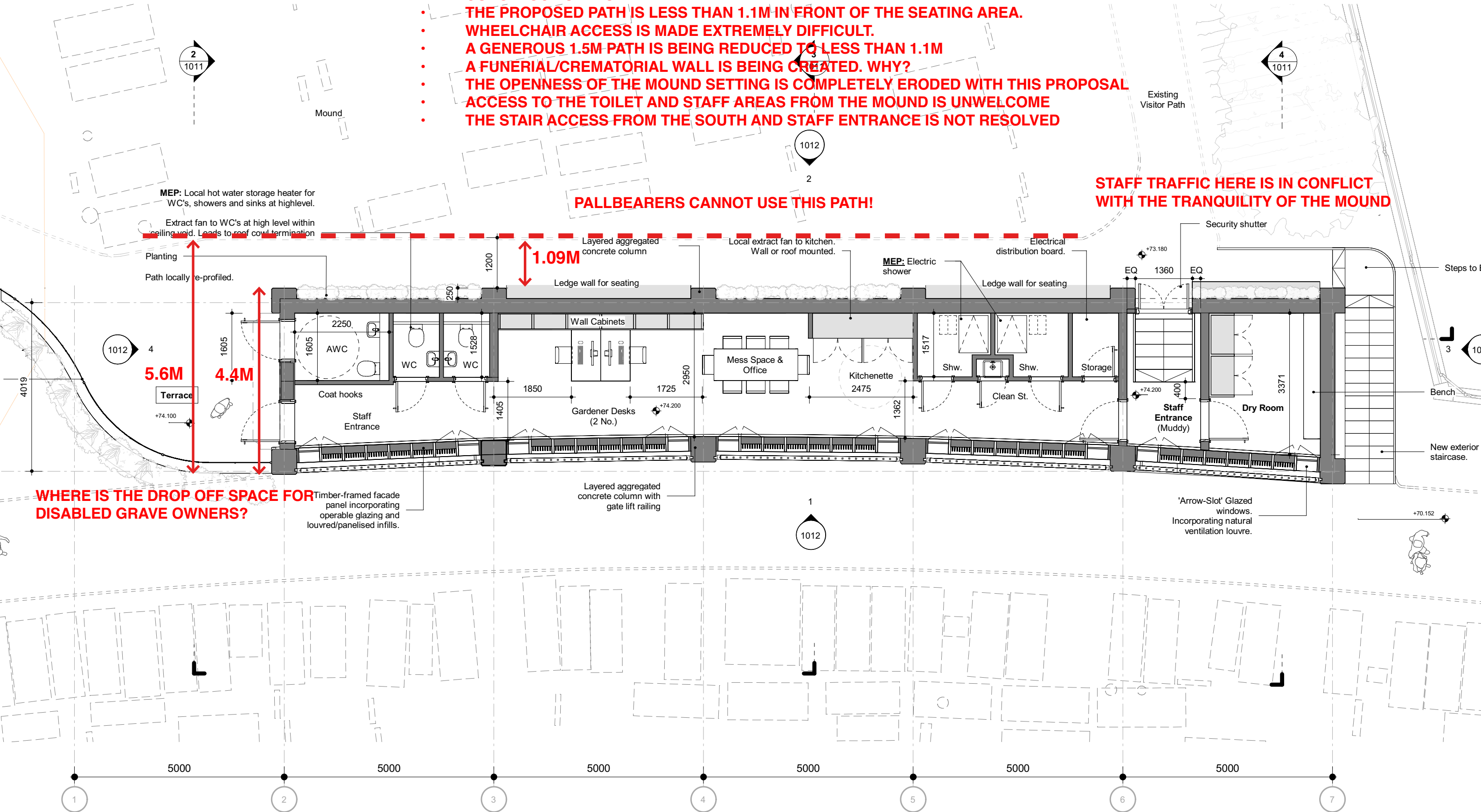
Cemetery Plot Boundary

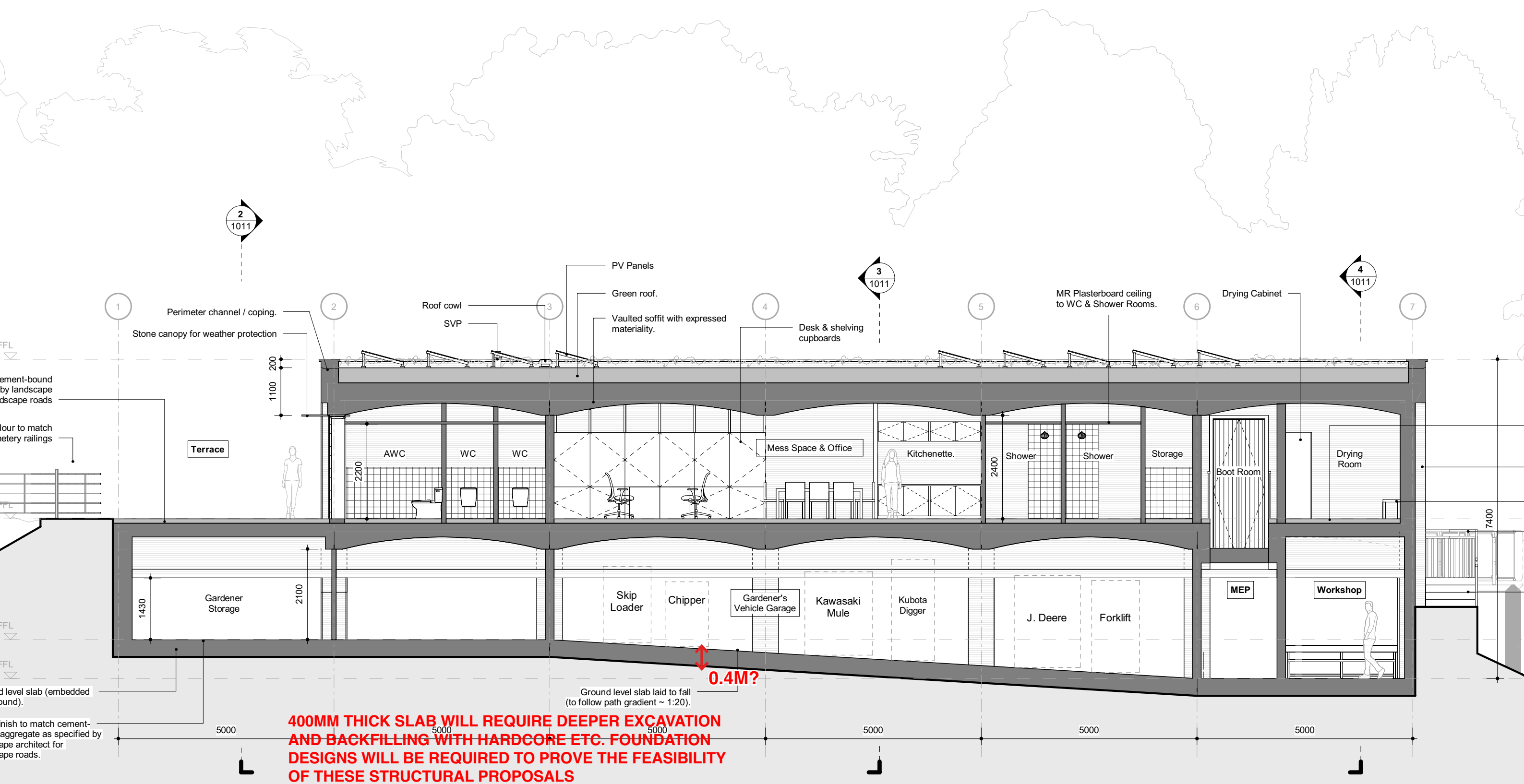


- HOW CAN EXISTING GRAVES BE PROTECTED DURING CONSTRUCTION ?
- GRAVE OWNERS CANNOT ACCESS THE GRAVES WITHOUT THE PATH DURING CONSTRUCTION WORK
- THE PROPOSED PATH IS LESS THAN 1.1M IN FRONT OF THE SEATING AREA.
- WHEELCHAIR ACCESS IS MADE EXTREMELY DIFFICULT.
- A GENEROUS 1.5M PATH IS BEING REDUCED TO LESS THAN 1.1M
- A FUNERAL/CREMATORIAL WALL IS BEING CREATED. WHY?
- THE OPENNESS OF THE MOUND SETTING IS COMPLETELY ERODED WITH THIS PROPOSAL
- ACCESS TO THE TOILET AND STAFF AREAS FROM THE MOUND IS UNWELCOME
- THE STAIR ACCESS FROM THE SOUTH AND STAFF ENTRANCE IS NOT RESOLVED

**STAFF TRAFFIC HERE IS IN CONFLICT
WITH THE TRANQUILITY OF THE MOUND**

RTimber-framed facade panel incorporating operable glazing and louvred/panelised infills.



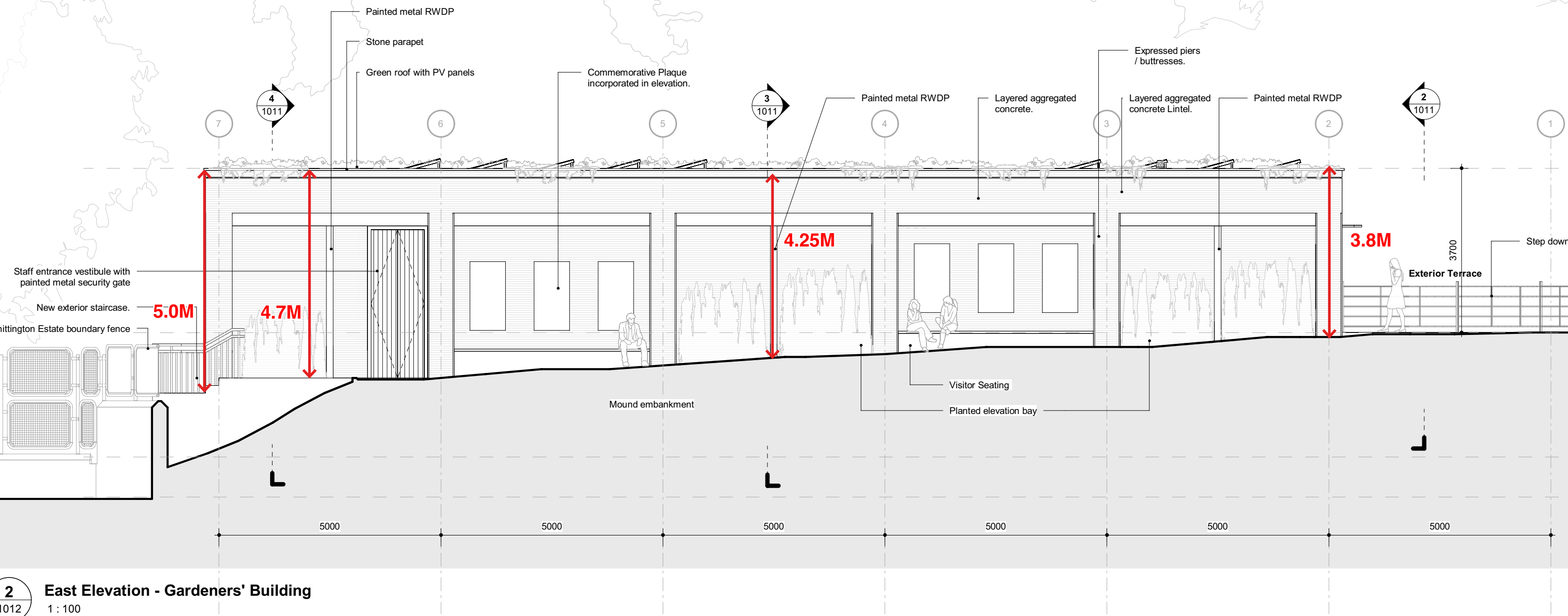


Mound Terrace

Mess Space & Office. Vehicle Storage Below

WITHOUT FOUNDATION DESIGNS, IT'S NOT POSSIBLE TO ACCEPT THE VALIDITY OF WHAT IS DEPICTED ON THIS DRAWING. THE DRAWING SHOWS A TWO STOREY BUILDING OF HEAVY CONSTRUCTION FLOATING ON A RAFT. AS THE GROUND BENEATH ARE ANCIENT GRAVES, IT IS HIGHLY LIKELY THAT THE GROUND CONDITIONS WILL NECESSITATE PILES OR DEEP STRIP FOUNDATIONS OR A MUCH THICKER SLAB. ALL OF THESE OPTIONS WILL MORE THAN LIKELY IMPACT ON THE GRAVES BENEATH.

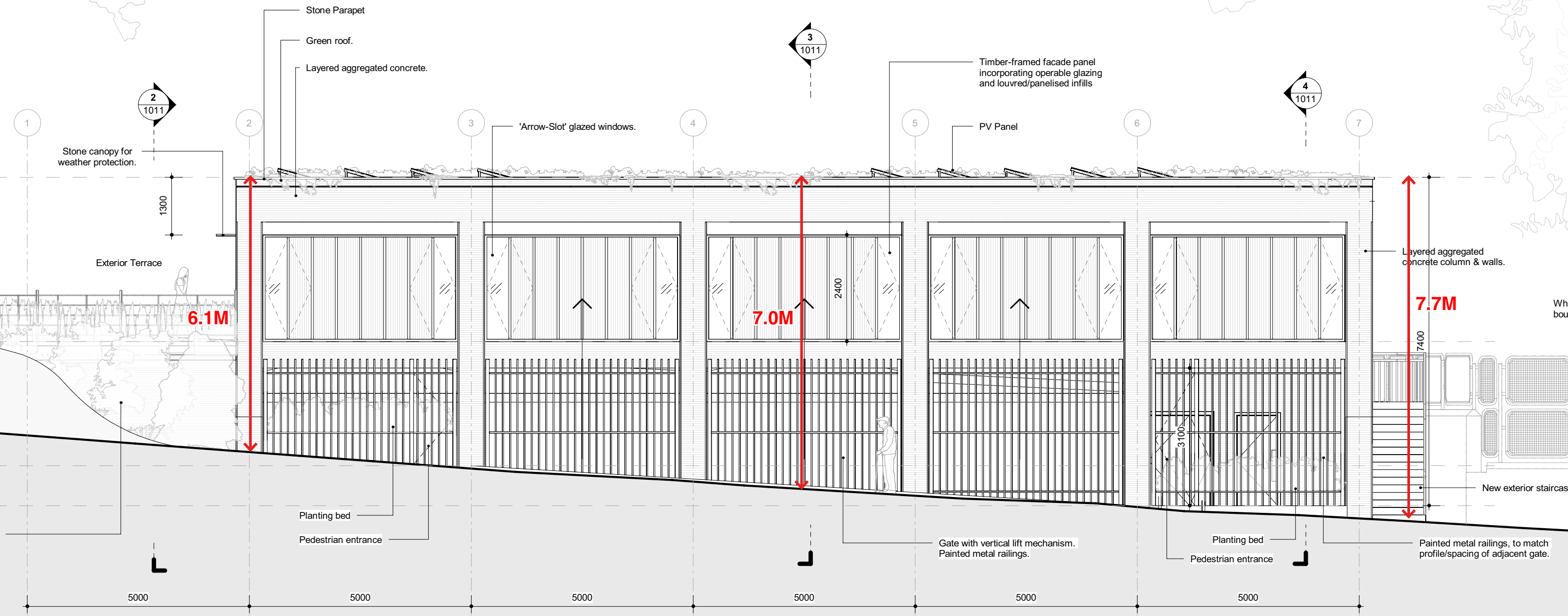
A 4M HIGH FUNERIAL/CREMATORIAL TYPE BUILDING BUILT HARD UP AGAINST A 1.05M WIDE PATH ON THE MOUND IS INCONGRUOUS WITH THE SETTING OF THE LISTED LANDSCAPE WITH REGARDS TO OPENNESS AND IT' PHYSICAL SHEER IMPACT ON THE HISTORIC SETTING



2 East Elevation - Gardeners' Building
1012

Gardeners' Building- East Elevation

A 7.7M HIGH BUILDING BUILT HARD UP AGAINST A 2.5M WIDE PATH THROUGH THE CEMETERY IS INCONGRUOUS WITH THE SETTING OF THE LISTED LANDSCAPE AND IT'S PHYSICAL SHEER IMPACT ON THE HISTORIC SETTING



Gardeners' Building

Gardeners' Building : Offices / Staff Spaces above & Vehicle storage below.