

By email

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

13th May 2025

Dear Miriam Baptist,

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

I submitted an objection on 24th March 2025 objecting to the above application, within days after we became aware of the proposals quite by accident and at your advice at that early stage without the benefit of seeing all the relevant information relating to the application and without the benefit of the views and comments of the grave owners on the Mound. My comments then mostly related to the Gardeners' Building (Project 6) in the East Cemetery next to the Mound.

Following your advice again, instead of making an Addendum submission to my objection I have updated my submission and added a further a **related secondary objection** to the proposed replacement of gardener's compound with the proposed Community and Education Building (Project 1).

I think it is well worth restating that as grave owners, we were not consulted at any stage of the development process for these proposals, nor were we made aware of the application being lodged with the Council or included in the statutory consultation carried out by the Council. There were no notices close to the Mound. When we contacted and met Highgate Cemetery Trust they were very reluctant to acknowledge the lack of consultation but nevertheless reluctantly agreed to consult the grave owners, but to date we are not certain if all grave owners at the Mound are informed of the proposals.

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

It is clear that all grave owners on the Mound are yet to be informed of the proposals, as objections continue to be made to the Council. I would strongly suggest that all grave owners at the Mound and nearby in the main Cemetery are now properly informed of the proposals, and their views are sought. They should have adequate time to consider the proposals well before any decision is considered by the Council.

These objections are not aimed at the Trusts' efforts to set a long term vision for Highgate Cemetery, a unique place. As a grave owner, I would welcome the proposals to conserve, enhance, and care for the landscape and heritage of the Highgate Cemetery while preserving it as a working burial ground. However, I have very serious concerns regarding some proposals included in the application.

I object in the strongest terms to the proposed Gardener's Building (Project 6). The location, design and functions of the building, including its scale, height and activities therein are inappropriate, unacceptable and unworkable.

I also object to a related proposal, the Project 1: Community and Education Building, which can be provided elsewhere in the Cemetery without replacing a necessary use from its most appropriate location. Further detailed comments are included at the end of this statement.

Below, detailed comments to support objections are given under 5 headings: i) The impact of the proposals on the open character of the East Cemetery, ii) The impact on special character and historic elements of the East Cemetery and visitors, iii) The impact of the proposals on the Mound, iv) The design of the proposed Gardeners' Building, v) Accommodating the gardeners' needs.

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

I consider the following impacts unacceptable, and object to them strongly.

In the Camden Local Plan (Adopted July 2017 and Draft January 2024) Highgate Cemetery/Waterlow Park area is identified as a designated Metropolitan Open Land (MOP), one of four MOPs in Camden. The Plan states that "We will protect the openness and character of these spaces". Under Policy NE1- Natural Environment the Council will "Give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL)". The current proposals for the Gardeners' Building are contrary to these policies.

The overwhelming character of the East Cemetery is its undisrupted views and flowing landscape, which continue from/to Waterlow Park to its North. Unlike the West Cemetery, it hardly has any buildings and/or historic or otherwise structures other than those around its entrance. The Gardeners Building, a multi-storey multi-use building, will substantially impact the open character of the East Cemetery and will diminish its overwhelmingly open character. The attached photographs show this open character around the Mound.

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

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

Similarly Camden's email feedback of 22nd Oct 2024, shortly before the application for full planning permission was made, as quoted in Hopkins Design & Access Statement V.3, Nov 2024, state that:

- "Impact on openness as building is in 'middle of Cemetery'. Further work needed to bring form down to appear more as a single story."
- "Charm/concept of the buttresses has been lost"

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

The applicant's Planning Statement tries hard but fails to make a convincing case for Very Special Circumstance for the proposals within MOL.

ii) The impact on special character, historic elements and visitors

The East Cemetery is integral part of the listed Highgate Cemetery, its character distinct but complementary reflecting its topography and location next to a large public park within MOL. It contains many well known graves including Karl Marx's tomb which is a major landmark and one of the most visited sites in the East Cemetery. The proposed Gardeners' Building will become an imposing background view to this significant site, and will substantially impact its setting. In addition Tomb often have large number of visitors. The inevitable movement of machinery and vehicles through and near this most visited part of the cemetery will be very disruptive, even potentially risky as the 'roads' are narrow shared pathways, primarily for pedestrians (no 'pavements' as such anywhere) throughout the cemetery often lined up with graves on both sides.

These paths are also completely unsuitable to take large vehicles and machinery that may well be needed during the construction period of the proposed Gardener's Building, likely to be quite an extended period not least because the Mound is a filled area and will require substantial work to stabilise it before any building

works. Further the site is in the middle of the cemetery and away from both of entrances to the cemetery with the result that any construction traffic will have a huge unacceptable impact on visitors and grave owners alike, notwithstanding the noise and hive of construction activity completely destroying any peace and quiet expected in this world famous Cemetery for a long period.

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

iii) The impact of the proposals on the Mound and the grave owners

I consider the following impacts unacceptable, and object to them strongly.

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

The level of activity created in and around the Gardeners' building, from concentration of activity relating to machinery, tools, workshops, and facilities for gardeners, would destroy all the peace and serenity that one expects in a cemetery setting. For the Mound, part of East Cemetery with probably the largest number of recent burials in one place, this will have a huge impact and is not acceptable. Alan Baxter study of 2019 which provided the background to the current studies supporting the application includes Objective 6.19.1 "minimize any negative impacts on the bereaved" (p.127). The impacts during the construction period would be even much greater limiting access and destroying any peace and serenity for an extended period.

The proposed Gardeners' Building will disconnect the Mound from the rest. The Mound would be hemmed in between the proposed Gardeners' Building and the existing Whittington Estate buildings immediately beyond the boundary to its south and east effectively isolating it from the rest of the East Cemetery. The Mound will effectively become a backyard to a large busy utilitarian building.

The Design & Access Statement V3 states that "The Mound location was confirmed as an area suitably remote which could be maximized to accommodate all the gardening facilities." (p.12) "This embankment was identified as an area requiring stabilisation making it a suitable location for a new facility to assist the Cemetery's operations team." (p.70). It is hard to believe that such unrelated, arbitrary and incorrect bases are used to locate the Gardeners' Building to the detriment of the open character of the East Cemetery and in ignorance of the impact on the Mound, the grave owners and the visitors. Please also note Camden Design Panels comments that "It cannot comment on whether the best locations have been chosen" (p.38).

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

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

iv) The design of the Proposed Gardeners' Building

I consider the following impacts unacceptable, and object to them strongly.

The proposed Gardeners' Building is a substantial utilitarian building proposed for a prominent site in this historic area with many protective designations. The proposed building is:

- 25.5m (with lower floor gardeners storage below the 'terrace' it is 30.5m) long, plus the external stairs to one side adding 1.2m
- 5m deep,
- 7.8m from lower path and 5m from the Mound at its highest point

It is proposed to build the lower ground floor of the building into the Mound under the current access path at the Mound level as its footprint seems much greater than the embankment. The 're-provided' Mound path will be much narrower. Significant and unacceptable impacts will include:

- risk of disturbance of the new graves on the Mound during construction, for example the submitted drawings show graves falling within / very close to the 500mm construction margin
- likely disturbance of old graves under the embankment
- limiting access of grave owners during construction, likely to be an extended period
- limiting wheelchair accessibility as the new path will be much narrower, with obstructions such as seats and plants, doors opening onto it
- limiting access during burials for mourners and pallbearers
- limiting access for machines for burial and for maintenance

The building is also now much closer at its southern end to the fence of Whittington estate removing an existing mature screening hedge. Clearly there is an effort to squeeze a large building into a smaller site with all the resulting consequences. There isn't enough detail in the application material on the feasibility doing so to allow proper assessments to be made.

The submitted drawings / images do not adequately show the visual impact of the building, and some misrepresent its true dimensions. I previously suggested that the applicant produce photomontages from various viewpoints, but another grave owner, Amir Sanei's objection submission include such photographs showing the correct dimensions, they show clearly the overwhelming size of the building from various viewpoints and clearly demonstrate its likely impacts. I fully agree and support this expertly produced information.

On the lower level the building rises from the edge of the path with full height railings / shutters on the lower floor and full height windows on the 1st floor exacerbating its visual impact. On the Mound side visual impact of a 5m high blank wall is far too imposing. It will cast a shadow over the western half of the Mound for most of the day and for most of the year.

The proposed Gardeners' Building will generate unacceptable levels of vehicular and pedestrian traffic both during construction and while in use and permanently destroy the serenity of the cemetery setting. Entering the first-floor offices and mess room from the level of the graves will generate unrelated disruptive pedestrian traffic around this sacred area. It will be very disruptive while vehicles enter and exit the building as the path in front is narrow at this point. During the recent site meeting with the Planning Officer we had the opportunity to observe gardening vehicles turning by reversing into the pedestrian ramp access to the Mound. In fact it is highly likely that it'll be very difficult for vehicles to enter & exit the building without disturbing the graves on the other side of the path.

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

The Gardeners' Building fails the designers proposed concept of following the principle of an English garden wall, with its scale, height and its elevation of garage doors and substantial windows, and is not appropriate to meet the "challenge of ... contextually sensitive location". If a retaining wall is required at the Mound for stability of the ground then the principle of an English garden wall may be a possible solution but no higher than the ground level at the Mound, and certainly not a substantial building pretending to be wall.

v) Accommodating the gardeners' needs

I strongly believe that the Gardeners' accommodation needs can and should be provided at its current location in the East Cemetery with a sensitive approach to its design. If "the building fabric is beyond its design life" and has "a poorly performing fabric" (The Design & Access Statement Volume 3, p.79-80) these should be addressed at its current location and not elsewhere where its impacts on East Cemetery, the Mound, the visitors and the grave owners are not acceptable, and contrary to local and national policies.

I therefore strongly object to the change of use of the gardener's compound to another use (Project 1):

- the current gardener's compound being so close to the entrance of the East Cemetery is the most appropriate location for such a critical facility
- the proposed new building increases both the footprint and the floorspace significantly, and the proposed floorspace of 173.7sqm favourably compares to the proposed Gardener's Building at the Mound at 201.3sqm. The difference in floorspace is small and some of the gardeners needs can be easily located elsewhere
- the building is located in an area that do not have recent graves unlike the Mound effecting the grave owners whose memories and griefs are still very fresh
- the community and education facility is proposed to be used out of hours to raise income possibly for unrelated activities, this constitutes a clear change of use in contravention of the local and national policies (MOL, Site of Metropolitan Importance, Open Space, Conservation, Grade 1 listed status)
- the cemetery has many other buildings and spaces to support community and education use both within and out of hours, including the Chapels and the new Visitor, Operations and Volunteers Building (Project 2).

The gardeners accommodation should not be moved from its current location. It is not possible to understand the logic of moving a necessary accommodation for the cemetery to an unsuitable problematic unacceptable location to make way for a "good to have" use which can be accommodated elsewhere.

I note that plans in The Design & Access Statement Volume 3 shows a large strip of land along the Stoneleigh Terrace as an Indicative Maintenance and Skip location. This strip is larger than the site next to the Mound, and has a dedicated access path. It is also much closer to one of the entrances to the East Cemetery for easy access. It therefore has the potential to accommodate single-storey facilities for machinery, a tool store and a workshop to complement the gardeners' accommodation at its existing site. Some garages looked un-utilised, though this needs to be confirmed, they may be suitable to accommodate tool store, workshop and similar avoiding the need for new structures. There is already a similar use at the western end of the garages. And a vehicles compound can be created along the strip of open land between the graves and the garages. This approach would have a minimal impact on the landscape and open character of the East Cemetery, the visitors and the Mound and the grave owners.

vi) Conclusion

It is clear that the Mound is not the right location for the proposed Gardeners' Building and the current application should be refused, or the application should be amended to exclude the Gardeners' Building from the application. Approval could set a precedent for further development in and around the Mound and in the wider cemetery risking the future character and integrity of the Mound and the Cemetery.

It is also important to note that through the scheme development process the Gardener's accommodation was to be provided at its current location until November 2023 when a change of function was introduced together with a two storey building proposal at the Mound for the Gardeners. It is regrettable that no attempt was made to consult and involve the grave owners at the Mound at the time which would have avoided the locating such a damaging and impactful building at such an inappropriate location.

Yours sincerely,

Emel Teymur

Photos showing the open nature of the East Cemetery and the Mound :

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



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



Image 3 - View from the Mound looking west



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



