

To the Board of Trustees

Friends of Highgate Cemetery Trust

Swain's Lane, London N6 6PJ

30th May 2025

Dear Trustees,

Urgent Concerns Regarding Development Plans and Governance Failures

We, Mound grave owners, write to you as a concerned party regarding Planning Application 2024/5407/P & 2024/5423/L, in particular the Gardeners' Building on Highgate Cemetery (East Mound). We raise serious issues about transparency, governance, and the fulfilment of your charitable objectives.

We fully recognise that managing a site of such profound historical, cultural, and emotional significance—as both a heritage landmark and an active burial ground—is a complex and demanding responsibility. It necessarily involves difficult decisions and substantial maintenance efforts. We appreciate the commitment and care that the Trustees and staff have shown in stewarding the cemetery over the years.

However, despite the deeply sensitive nature of the site, several critical missteps have occurred that warrant immediate attention and redress.

Summary of Concerns**1. Failure to Notify Stakeholders Appropriately**

We, Mound grave owners, were only informed of the proposals well after the planning application was made (Dec 2024) and after the formal consultation deadline (early Jan 2025) had passed. The council was compelled to reopen the consultation period. This reflects a failure to act with reasonable care and competence.

2. Inadequate Justification and Mismanagement of Burial Records

The rationale provided for the communication failures is contradicted by the presence of recent graves in the affected area. At best, this points to poor data management, an issue of such gravity that it should be formally reported to the Charity Commission.

3. Violation of Charitable Objectives

The development threatens the natural character of the site, directly conflicting with your charity's stated aim to "*preserve it as a place of historic and other interest and beauty*".

4. Neglect of Mourning Families and Cultural Sensitivities

There is an evident disconnect between the charity's current objectives and the lived reality of an active burial site. From Article 6.1 of Association, the Trust is bound "*to speak and act on behalf of all who care for the Cemetery as a place of historic and other interest, including those who cherish the memory of persons buried there*". Families who visit, mourn, and cherish the memory of loved ones have not been considered with the

dignity and respect they deserve. To fulfill the charity's objective of keeping Highgate an active burial ground, it is essential for the public and those considering interment to trust they and their loved one's remains will be treated with respect and consideration. This trust has now been breached. We therefore view the current events as conflicting with one of the three key objectives of the charity and Article 6.1 of Association.

5. **Lack of Transparency with Recent Purchasers**

A number of grave purchasers after 2023 reported to not be informed of the proposed development, despite references to it in the Trust's published financial accounts. This constitutes a potential breach of consumer rights, which we are investigating.

6. **Concerns Over Process and Use of Resources**

We also wish to raise an additional concern regarding the manner in which this project has been approached, which has implications not only for governance but for the responsible use of charitable funds.

The Trust commissioned and adopted a **Conservation Plan**—presumably to guide future development and preservation of the site—and then ran architectural competitions to implement it. Presumably, the selected architects' submission was chosen because it aligned well with the objectives of this Conservation Plan. Yet the proposals now presented in the planning application appear to diverge significantly from both the Conservation Plan's guidance and, it seems, the competition-winning submission.

For example, the Conservation Plan recommendations for the Lulot area, which includes the Mound (p. 233), suggest sensitive and enhancement-oriented interventions: upgrading paths, managing hedges with ecological and visual sensitivity, maintaining views, enhancing seating and fencing, and potentially introducing a columbarium in one of the few appropriate wildflower areas. These are thoughtful, incremental improvements.

Instead, the current proposals appear much more intrusive and damaging to the character of the site—and starkly at odds with both the spirit and the specific guidance of the Plan. Similarly, it is unclear why aspects of the winning architects' (Hopkins') proposal appear to have been dropped or not meaningfully implemented.

The Conservation Plan also contains policies and guidance (e.g. p. 127) specifically aimed at protecting the interests of grave owners—yet these seem to have been overlooked in practice. We are concerned not only about consultation and transparency, but crucially also about the appropriate and efficient use of the charity's financial and organisational resources. It is essential that charitable funds—drawn ultimately from public trust and often from families connected to the Cemetery—are used in ways that are consistent, transparent, and justifiable.

Questions

We respectfully request that the following questions are answered transparently and in full:

Planning

- A. Why are alternative development sites not considered? We identified a number of suitable alternatives, for instance on Stoneleigh Terrace. Alternatives have been

identified and referred to vaguely and unconvincingly in the Design and Access Statements. There is a strong perception that not all options were explored with genuine openness or political will.

- B. Did the Trust undertake a strategic assessment of suitable land—within or near the Cemetery—*before* formulating the architectural brief, or was the process led by a list of accommodation needs (that were challenged by Camden planners and others during the PPA process)
- C. Was there a clear and documented effort to distinguish between essential operational requirements (“must haves”) and more aspirational or discretionary features (“nice to haves”) in the development brief?
- D. If such a distinction was made, can the Trust now provide a transparent breakdown of what constitutes the “must haves”?
- E. Have the “must haves” been realistically tested against land availability, both within and outside the Cemetery, before placing them in ecologically or emotionally sensitive locations like the Mound?
- F. If the available land within the Cemetery cannot reasonably accommodate all essential needs, what off-site or hybrid alternatives were considered? Was any formal feasibility work undertaken to evaluate these options?
- G. Or has the development process allowed “nice to haves” to take precedence early on, effectively displacing “must haves” into increasingly unsuitable and controversial areas?
- H. Have the Trustees carefully assessed whether the overall volume (“quantum”) of new buildings proposed in the masterplan is genuinely justified? Have they explored opportunities to consolidate functions into multifunctional spaces (e.g. combining meeting rooms, offices, and engagement areas) to reduce footprint and impact?
- I. Could local buildings such as Lauderdale House or other nearby community facilities be used to meet some needs, thereby relieving pressure on the Cemetery’s core landscape?
- J. Is the proposed treatment of any human remains encountered during construction of the Gardener’s Building covered by the powers granted under the Highgate Cemetery Act 2022? Has legal advice been obtained to confirm this?
- K. Have the Trustees taken into account the Ministry of Justice and DCA guidance for Burial Ground Managers, particularly in relation to unintended discrimination affecting the treatment and location of common graves?
- L. What provisions are in place to manage access during the likely extended construction period—for grave owners, mourners, disabled visitors, pallbearers, burial machinery, and funeral processions? Will these arrangements involve disruption or damage to the existing landscape, and if so, what mitigation measures are planned?

Governance

- M. Have the Trustees considered whether consumer rights have been infringed for the grave plots sold in the past 2-3 years?
- N. Is there adequate oversight by the Trustees, or has effective control been delegated improperly to executive management?

- O. Have serious incidents—including consultation failures, data issues, and reputational risks—been reported to The Charity Commission, as required? We kindly ask a copy of such reports.

Next Steps

We urge you to respond constructively to these concerns and to take the following actions without delay:

- **Suspend further progress** on the proposed development of the Gardener's Building. Nearly 100 objections have been submitted since Mound Grave Owners became aware of the proposals, underscoring the strength of public concern.
- **Reassess the project** in light of your charitable duties and ethical responsibilities, including the preservation of the Cemetery's natural and cultural character, and the dignity owed to those interred and their families.
- **Provide full transparency**, in particular around the creation of the architectural brief: what needs were identified, how those needs were prioritised, what feasibility studies were conducted, and what alternatives—both in terms of land use and design—were genuinely explored. We request that all relevant documentation be shared with us so the process can be properly understood and scrutinised.
- **Initiate an independent review** of your consultation and data management processes to identify failures and implement meaningful improvements.

If these matters are not resolved transparently and in good faith, we will have no option but to submit a formal complaint to The Charity Commission and to the National Lottery Heritage Fund, citing concerns over mismanagement, failure of governance, and potential breach of trustee duties. It is also likely that the press will become aware of such complaints.

We hope it will not come to that, and that you will treat this correspondence with the seriousness it warrants. If mistakes have been made, they can and should be acknowledged—so that lessons may be learned for the benefit of all.

We look forward to working constructively to preserve Highgate Cemetery. The soul of the Cemetery resides not only in its rich heritage, but in those who are buried there, those who love and remember them, and those who dedicate themselves to its care and preservation. We should all not lose sight of that.

Yours sincerely,

Mound grave owners and mourners, in alphabetical order:

Fiona Anderson

Victoria Barrett

Sarah & Tamsin Boardman

Olivia Campbell-O'Brien

Natalie Chambers
Christine, Julia, Olivia Chapman
Carmen, Caroline & Nicolette David
Judith Dewitt
Susan Drake
Catherine Hall
Patrick & Dorcas Kiernan
Sally & Jane Lewis
Flavia Mancini-Chapman
Pamela Miles
Sylvia McGinnis
Deirdre McGinnis Lopez
Alexandra Ouroussoff
Esther & John Oxford
Mahin Ramani
Joanna Selman
Tom Pigott-Smith
Anna Seifert-Speck
Abigail & Amir Sanei
Elizabeth Sarkany
Kerem & Leyla Sezer
Tania Stok
Conny Templeman
Zoë & Keir Templeman-Young
Emel & Onur Teymur
Jeremy, Eli & William Watson
Sara, Emily & Natasha Wood
Cairn & Colin Young