

Address:	Highgate Cemetery Swain's Lane London N6 6PJ		1&2
Application Number(s):	i) 2024/5407/P ii) 2024/5423/L	Officer: Miriam Baptist	
Ward:	Highgate		
Date Received:	03/12/2024		
Proposal:	Restoration, conservation, demolition, replacement and erection of buildings in East Side and West Side of Highgate Cemetery, including erection of visitor and operations building, erection of a community/ education building, relocation of Perkins monument on the West Side, Cemetery wide landscaping, drainage, public realm, access works and repair of mausolea, to support the function of a working cemetery, visitor and community uses.		
Background Papers, Supporting Documents and Drawing Numbers: Existing Drawings: Location Plan HIG-GPB-ZZ-ZZ-L-DR-0001 rev R2, Highgate Cemetery Memorial Plan C0701001-P-02 rev B, Chapel Elevation 1 Existing 1066-3-1-01-P1, Chapel Elevation 2 As Existing 1066-3-1-02-P1, Chapel Elevation 3 As Existing 1066-3-1-03-P1, Chapel Elevation 4 As Existing 1066-3-1-04-P1, Lodges Site Plan 1066-9-3-00-P1, South Lodge Plans Elevations Existing 1066-9-3b-10-P1, South Lodge Plans Roof Plan Proposed 1066-9-3B-20-P2, South Lodge Elevation 1 1066-9-3B-21-P2, South Lodge Elevation 2 1066-9-3B-22-P2, South Lodge Elevation 3 1066-9-3B-23-P2, Chapel Site Plan 1066-3-1-00-P1, SECTION AA EXISTING THROUGH DISSENTERS CHAPEL 1066-3-1-10-P1, SECTION FF EXISTING 1066-3-11-P1, SECTION GG EXISTING 1066-3-1-12-P1, SECTION HH EXISTING 1066-3-1-13-P1, CHAPEL ROOF PLAN AS EXISTING 1066-3-1-14-P1, CHAPEL ROOF PLAN PROPOSED RESTORATION AND CONSERVATION 1066-3-1-20-P2, CHAPEL ELEVATION 1 PROPOSED CONSERVATION AND RESTORATION 1066-3-1-21-P2, CHAPEL ELEVATION 2 PROPOSED CONSERVATION AND RESTORATION 1066-3-1-22-P1, CHAPEL ELEVATION 3 PROPOSED CONSERVATION AND RESTORATION 1066-3-1-23-P2, CHAPEL ELEVATION 4 PROPOSED CONSERVATION AND RESTORATION 1066-3-1-24-P1, SECTION AA PROPOSED DOME DETAIL 1066-3-1-25-P2, SECTION AA PROPOSED THROUGH PARAPET 1066-3-1-26-P2, SECTION BB EXISTING AND PROPOSED 1066-3-1-29-P1, SECTION CC EXISTING AND PROPOSED 1066-3-1-30-P2, SECTION DD CUPOLA STRUCTURE 1066-3-1-31-P2, SECTION EE CUPOLA STRUCTURE 1066-3-1-32-P1, CUPOLA STRUCTURE PLANS 1066-3-1-33-P1, DOME 2 PINNACLE 2 AND 3 PLANS AND ELEVATIONS 1066-3-1-34-P2, PINNACLE 4 PLANS AND ELEVATIONS 1066-3-1-35-P2, PINNACLE 5 PLANS AND ELEVATIONS 1066-3-1-36-P2, SECTION FF PROPOSED 1066-3-1-37-P2, SECTION GG PROPOSED 1066-3-1-38-P2, SECTION HH PROPOSED 1066-3-1-39-P2, Otway Mausoleum Existing 1066-10-15-10-P2, Rosa Mausoleum Existing 1066-10-14-10-P2, Kelman Mausoleum Existing 1066-10-13-10-P2, Jankovich Mausoleum Existing 1066-10-12-10-P2, Morgan Mausoleum Existing 1066-10-11-10-P2, Mausolea Site Plan 1066-10-9-00-P2, Hartley Mausoleum Existing 1066-10-10-10-P2, Cheylesmore Mausoleum Existing 1066-10-9c-10-P2, Dalziel Mausoleum Existing 1066-10-19-10-P2, Foster Mausoleum Existing 1066-10-18-10-P2, Guerrier Mausoleum Existing 1066-10-17-10-P2, Da Silva Mausoleum Existing 1066-10-16-10-P2, Beer Mausoleum Existing 1066-10-9b-10-P2, Cory Wright Mausoleum Existing 1066-10-9a-10-P2, Terrace Catacombs Site Plan 1066-10-8-00-P2, Terrace Catacombs Floor Plan Existing 1066-10-8-10.1-P2, Terrace Catacombs Floor Plan Existing 1066-10-8-10.2-P2, Terrace Catacombs Floor Plan Existing 1066-10-8-10.3-P2,			

Terrace Catacombs Reflected Ceiling Plan Existing 1066-10-8-11.1-P2, Terrace Catacombs Reflected Ceiling Plan Existing 1066-10-8-11.2-P2, Terrace Catacombs Reflected Ceiling Plan Existing 1066-10-8-11.3-P2, Terrace Catacombs Roof Plan Existing 1066-10-8-12.1-P3, Terrace Catacombs Roof Plan Existing 1066-10-8-12.2-P2, Terrace Catacombs Roof Plan Existing 1066-10-8-12.3-P3, Terrace Catacombs Elevations / Sections Existing 1 1066-10-8-13.1-P2, Terrace Catacombs Elevations / Sections Existing 2 1066-10-8-13.2-P2, Terrace Catacombs Elevations / Sections Existing 3 1066-10-8-13.3-P2, Circle of Lebanon Site Plan 1066-10-7-00-P2, Circle of Lebanon GF Plan Existing 1066-10-7-10-P2, Circle of Lebanon Inner Circle RF Plan Existing and parapet details 1066-10-7-11-P2, Circle of Lebanon Outer Circle RF Plan Existing and Parapet Details 1066-10-7-12-P2, Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.1-P2, Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.2-P2, Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.3-P2, Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.4-P2, Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.5-P2, Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.6-P2, Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.7-P2, Circle of Lebanon Outer Ring Elevations Exst 1066-10-7-14.1-P2, Circle of Lebanon Outer Ring Elevations Exst 1066-10-7-14.2-P2, Circle of Lebanon Outer Ring Elevations Exst 1066-10-7-14.3-P2, Circle of Lebanon Outer Ring Elevations Exst 1066-10-7-14.4-P2, Circle of Lebanon Outer Ring Elevations Exst 1066-10-7-14.5-P2, Egyptian Avenue Site Plan 1066-10-6-00-P2, Egyptian Avenue GF Plan Existing 1066-10-6-10-P2, Egyptian Avenue Elevation 1 Existing 1 1066-10-6-11.1-P2, Egyptian Avenue Elevation 1 Existing 2 1066-10-6-11.2-P2, Egyptian Avenue Elevation 1 Existing 3 1066-10-6-11.3-P2, Egyptian Avenue Elevation 2 Existing 1 1066-10-6-12.1-P2, Egyptian Avenue Elevation 2 Existing 2 1066-10-6-12.2-P2, Egyptian Avenue Elevation 2 Existing 3 1066-10-6-12.3-P2, Egyptian Avenue Elevation 3 Existing Upper Portal 1066-10-6-13-P2, Egyptian Avenue Elevation 4 Existing Lower Portal 1066-10-6-14-P2, Cuttings Catacombs Site Plan 1066-10-5-00-P2, Cuttings Catacombs Existing Ground Floor Plan 1066-10-5-10-P2, Cuttings Catacombs Existing Roof Plan 1066-10-5-11-P2, Cuttings Catacombs Existing Elevations 1066-10-5-12-P2, Colonnade Site Plan 1066-10-4-00-P2, Colonnade Floor Plan Existing 1066-10-4-10-P2, Colonnade Ceiling Plan Existing 1066-10-4-11-P2, Colonnade Elevations Existing 1066-10-4-12-P2, Colonnade Roof Plan Existing 1066-10-4-13-P1, Lodges Site Plan 1066-9-3a-00-P2, North Lodge Plans and Elevations Existing 1066-9-3a-10-P2.

Proposed Drawings: Building drawings: Project 1 - Community & Education Building Existing East Lodge - Demolition Drawings HGC-HAL-CB-ZZ-DR-A-1000-S3-P02, Project 1 - Community & Education Building Floor Plans HGC-HAL-CB-ZZ-DR-A-1010-S3-P02, Project 1 - Community & Education Building Sections HGC-HAL-CB-ZZ-DR-A-1011-S3-P02, Project 1 - Community & Education Building Elevations HGC-HAL-CB-ZZ-DR-A-1012-S3-P02, Project 1 - Community & Education Building Enlarged Section and Elevation HGC-HAL-CB-ZZ-DR-A-1013-S3-P02, Project 3 - Dissenters' Chapel – Plans Demolition Plans - Ground & First HGC-HAL-DC-ZZ-DR-A-1000-S3-P02, Project 3 - Dissenters' Chapel – Plans Proposed Plans - Ground & First HGC-HAL-DC-ZZ-DR-A-1010-S3-P02, Project 3 - Dissenters' Chapel – Sections Proposed Sections HGC-HAL-DC-ZZ-DR-A-1011-S3-P02, Project 3 - Dissenters' Chapel – EA Enlarged Arrangement – Details HGC-HAL-DC-ZZ-DR-A-1012-S3-P02, Project 3 - Dissenters' Chapel – Details Main Entrance Door - Chapel Apse HGC-HAL-DC-ZZ-DR-A-1013-S3-P02, Project 3 - Dissenters' Chapel – Details Enlarged Sections - Interface Details HGC-HAL-DC-ZZ-DR-A-1014-S3-P02, Project 5 – East Cemetery – Sentry 1 – Plan, Elevation & Section HGC-HAL-ES-ZZ-DR-A-1010-S3-P02, Project 5.2 - East Sentry - Chester Road Entrance Proposed Plan, Elevation & Section HGC-HAL-ES-ZZ-DR-A-1011-S3-P02, Project 9.2 - South Lodge Existing Plans & Sections HGC-HAL-SL-ZZ-DR-A-1000-S3-P02, Project 9.2 - South Lodge Proposed Plans, Elevation & Sections HGC-HAL-SL-ZZ-DR-A-1010-S3-P02, Project 4 - Existing WC Block Demolition Drawings HGC-HAL-UB-ZZ-DR-A-1000-S3-P02, Project 4 - Proposed Utility Block Plans, Sections, Elevations HGC-HAL-UB-ZZ-DR-A-1010-S3-P02, Project 2 - Visitor and Operations Copy 1 Demolition Plan + Proposed Roof Plan

HGC-HAL-VB-ZZ-DR-A-1000-S3-P02, Project 2 - Visitor and Operations Building Highgate Cemetery Ground & First Level Plan-1010-S3-P02, Project 2 -Visitor & Operations Building - Sections-1011-S3-P02, Project 2 - Visitor & Operations – Elevations East & North – Elevation HGC-HAL-VB-ZZ-DR-A-1012-S3-P02, Project 2 - Visitor & Operations – Elevations West & South – Elevation HGC-HAL-VB-ZZ-DR-A-1013-S3-P02, Proposed Site Plan HGC-HAL-XX-XX-DR-A-1000-S3-P02

Conservation drawings: Otway Mausoleum Proposed 1066-10-15-20-P2, Otway Mausoleum Proposed 1066-10-15-21-P2, Rosa Mausoleum Proposed 1066-10-14-20-P2, Kelman Mausoleum Proposed 1066-10-13-20-P2, Jankovich Mausoleum Proposed 1066-10-12-20-P2, Morgan Mausoleum Proposed 1066-10-11-20-P2, West Scott Architects Project 10 Mausolea Doors & Fittings 1066-10-12/16/10-30 P2, Hartley Mausoleum Proposed 1066-10-10-20-P2, Cheylesmore Mausoleum Proposed 1066-10-9c-20-P2, Pocklington Mausoleum Existing and Proposed 1066-10-21-20-P2, Strathcona Mausoleum Existing and Proposed 1066-10-20-20-P2, Dalziel Mausoleum Proposed 1066-10-19-20-P2, Dalziel Mausoleum Proposed 1066-10-19-21-P2, Foster Mausoleum Proposed 1066-10-18-20-P2, Guerrier Mausoleum Proposed 1066-10-17-20-P2, Da Silva Mausoleum Proposed 1066-10-16-20-P2, Beer Mausoleum Proposed 1066-10-9b-20-P2, Beer Mausoleum Roof Proposed 1066-10-9b-21-P2, Cory Wright Mausoleum Proposed 1066-10-9a-20-P2, Terrace Catacombs Floor Plan Proposed 1066-10-8-20.1-P2, Terrace Catacombs Floor Plan Proposed 1066-10-8-20.2-P2, Terrace Catacombs Floor Plan Proposed 1066-10-8-20.3-P2, Terrace Catacombs Reflected Ceiling Plan Prop 1066-10-8-21.1-P2, Terrace Catacombs Reflected Ceiling Plan Prop 1066-10-8-21.2-P2, Terrace Catacombs Reflected Ceiling Plan Prop 1066-10-8-21.3-P2, Terrace Catacombs Roof Plan Proposed 1066-10-8-22.1-P3, Terrace Catacombs Roof Plan Proposed 1066-10-8-22.2-P3, Terrace Catacombs Roof Plan Proposed 1066-10-8-22.3-P3, Terrace Catacombs Elevations / Sections Proposed 1 1066-10-8-23.1-P3, Terrace Catacombs Elevations / Sections Proposed 2 1066-10-8-23.2-P2, Terrace Catacombs Elevations / Sections Proposed 3 1066-10-8-23.3-P2, West Scott Architects Project 10 Terrace Catacombs Existing Roof Terrace 1066-10-8-31 P2, West Scott Architects Project 10 Terrace Catacombs Roof Terrace Section 1066-10-8-32 P2, West Scott Architects Project 10 Terrace Catacombs West Steps 1066-10-8-33 P2, West Scott Architects Project 10 Terrace Catacombs East Steps 1066-10-8-34 P2, Circle of Lebanon Inner Circle RF Plan Proposed and parapet details 1066-10-7-21-P3, Circle of Lebanon Outer Circle RF Plan Proposed and Parapet Details 1066-10-7-22-P3, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.1-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.2-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.3-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.4-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.5-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.6-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.7-P2, Circle of Lebanon Outer Ring Elevations Prop 1066-10-7-24.1-P2, Circle of Lebanon Outer Ring Elevations Prop 1066-10-7-24.2-P2, Circle of Lebanon Outer Ring Elevations Prop 1066-10-7-24.3-P2, Egyptian Avenue Elevation 1 Proposed 1 1066-10-6-21.1-P2, Egyptian Avenue Elevation 1 Proposed 2 1066-10-6-21.2-P2, Egyptian Avenue Elevation 1 Proposed 3 1066-10-6-21.3-P2, Egyptian Avenue Elevation 2 Proposed 1 1066-10-6-22.1-P2, Egyptian Avenue Elevation 2 Proposed 2 1066-10-6-22.2-P2, Egyptian Avenue Elevation 2 Proposed 3 1066-10-6-22.3-P2, Egyptian Avenue Elevation 3 Proposed 1066-10-6-23-P3, Egyptian Avenue Elevation 4 Proposed 1066-10-6-24-P2, Cuttings Catacombs Proposed Ground Floor Plan 1066-10-5-20-P2, Cuttings Catacombs Proposed Roof Plan 1066-10-5-21-P2, Cuttings Catacombs Proposed Elevations 1066-10-5-22-P2, Colonnade Floor Plan Proposed 1066-10-4-20-P2, Colonnade Ceiling Plan Proposed 1066-10-4-21-P2, Colonnade Elevations Proposed 1066-10-4-22-P2, Colonnade Roof Plan Proposed 1066-10-4-23-P1, North Lodge GF Plan Proposed 1066-9-3a-21-P2, North Lodge Roof Plan Proposed 1066-9-3a-22-P3, North Lodge Proposed Elevations 1 and 2 1066-9-3a-23-P3, North Lodge Proposed Elevations 3 and 4 1066-9-3a-24-P2.

Landscape drawings: GA Plan – Masterplan HIG-GPB-ZZ-ZZ-L-DR-1000 rev R4, GA Plan – East HIG-GPB-ZZ-ZZ-L-DR-1002 rev R4, Hardscape & Furniture Plan – East HIG-GPB-ZZ-ZZ-L-DR-1101 rev R4, Softscape Plan Understory – East HIG-GPB-ZZ-ZZ-L-DR-1201 rev R4, Softscape Plan Understory – West HIG-GPB-ZZ-ZZ-L-DR-1200 rev R3, Softscape Plan Trees – East HIG-GPB-ZZ-ZZ-L-DR-1301 rev R4, Softscape Plan Trees – West HIG-GPB-ZZ-ZZ-L-DR-1300 rev R3, Typical Hardscape Details - Drainage - 1 of 3 HIG-GPB-ZZ-ZZ-L-DR-4100 Rev R2, Typical Hardscape Details - Drainage - 2 of 3 HIG-GPB-ZZ-ZZ-L-DR-4101 Rev R2, Typical Hardscape Details - Drainage - 3 of 3 HIG-GPB-ZZ-ZZ-L-DR-4102 Rev R2, Typical Hardscape Details - Paving and Kerbs HIG-GPB-ZZ-ZZ-L-DR-4103 Rev R2, Typical Hardscape Details Weirs HIG-GPB-ZZ-ZZ-L-DR-4104 Rev R2, Typical Tree Pit Details 1 of 6 HIG-GPB-ZZ-ZZ-L-DR-4500 Rev R2, Typical Tree Pit Details 2 of 6 HIG-GPB-ZZ-ZZ-L-DR-4501 Rev R2, Typical Tree Pit Details 3 of 6 HIG-GPB-ZZ-ZZ-L-DR-4502 Rev R2, Typical Tree Pit Details 4 of 6 HIG-GPB-ZZ-ZZ-L-DR-4503 Rev R2, Typical Tree Pit Details 5 of 6 HIG-GPB-ZZ-ZZ-L-DR-4504 Rev R2, Typical Tree Pit Details 6 of 6 HIG-GPB-ZZ-ZZ-L-DR-4505 Rev R2, Typical Softscape Details 1 of 2 HIG-GPB-ZZ-ZZ-L-DR-4506 Rev R2, Typical Softscape Details 2 of 2 HIG-GPB-ZZ-ZZ-L-DR-4507 Rev R2, Terrace Steps Section HIG-GPB-ZZ-ZZ-L-DR-2000, Courtyard and Swain's Lane HIG-GPB-ZZ-ZZ-L-DR-2001, Café Interface and Access Control HIG-GPB-ZZ-ZZ-L-DR-2002, Cuttings Embankment Section HIG-GPB-ZZ-ZZ-L-DR-2003, Ballustrade and Steps to Cory-Wright Mausoleum HIG-GPB-ZZ-ZZ-L-DR-2004, Elevated Boardwalk to Terrace Section HIG-GPB-ZZ-ZZ-L-DR-2005.

Documents:

Phasing plan, Covering letter dated 1 September 2025 by Montagu Evans ref PD13571/LM/JH/OF, New Gardeners' Facilities: A Collaborative Approach by Friends of Highgate Cemetery Trust, Highgate Cemetery Landscape Masterplan: Design and Access Statement Volume 2: Introduction & Vision Rev 1 dated August 2025, Highgate Cemetery Landscape Masterplan: Design and Access Statement Volume 2: Landscape Design and Access Statement Rev 1 dated August 2025, Highgate Cemetery: Design & Access Statement: Volume 3: Architecture & Conservation doc ref: HGC-HAL-XX-XX-RP-A-1000 Rev P03 dated August 2025, Part 2: BS: 5837 Arboricultural Impact Assessment Report & 'Draft' Tree Protection Plan - West dated 4th October 2024 by Bartlett Consulting, Part 2: BS: 5837 Arboricultural Impact Assessment Report & 'Draft' Tree Protection Plan – East Rev 1 dated 20th August 2025 by Bartlett Consulting, Part 3: BS: 5837 Arboricultural Method Statement Report & 'Final' Tree Protection Plan Rev 1 dated 20th August 2025 by Bartlett Consulting, Archaeological desk-based assessment dated August 2025 by Mola, Building Impact Assessment ref 3500-A2S-XX-XX-RP-Y-0002-00 dated October 2024 by A-squared Studio, Basement Impact Assessment Audit Project No. 14291-45 date October 2025 rev D1 by Campbell Reith, Biodiversity Net Gain Report 2025 by Ashgrove Ecology, The Statutory Biodiversity Metric updated 29/08/2025, Building Damage Ground Movement Assessment ref 3500-A2S-XX-XX-RP-Y-0001-01 Rev 01 dated November 2024 by A-squared Studio, Draft Construction Management Plan dated August 2025 by Caneparo Associates, Ecological Impact Assessment version 4 dated August 2025 by Ashgrove Ecology, 1538 – Highgate Cemetery ref 1538-SAC-xx-xx-RP- Energy Statement Rev 6.0 dated 21/08/2025 by Skelly & Couch, Flood Risk Assessment P03 dated 20 August 2025 by Max Fordham, Heritage Statement dated August 2025 by Montagu Evans, Highgate Cemetery Landscape Masterplan Maintenance & Management Plan dated August 2025 by Gustafson Porter + Bowman, Noise Impact Assessment 22082025 dated 22/08/2025 by Gillieron Scott Acoustic Design, Planning Statement version 2 dated 2 September 2025, Statement of Community Involvement Addendum dated 1 September 2025, Statement of Need version 2 dated 1 September 2025, Structural Statement J4565 Highgate Cemetery ref J4565-S-RP-0002 Rev 02, Sustainability Statement for Planning dated September 2025, Transport Statement dated August 2025 by Caneparo Associates, Whole Life Carbon Project 1: Community & Education Building ref HGC-HAL-XX-XX-RP-A-1001 dated August 2025, GLA WholeLifeCarbonAssessment Template-P1 Baseline, Sustainable Drainage Strategy Report P04 dated 20 August 2025 by Max Fordham,

Pro-forma for any scheme in flood risk areas & all major development – Camden LLFA, West & East Cemetery Site Wide Landscape Drainage Layout j7048-MXF-XX-XX-DR-P-11000 rev P06 by Max Fordham, Outline Bat Roost Impact Assessment Rev 3.0 by MKA Ecology, Ecological Impact Assessment Version 3 dated December 2024 by Ashgrove Ecology, Highgate Cemetery Conservation Philosophy Prepared for the Friends of Highgate Cemetery Trust November 2024 by Alan Baxter, Structural Appraisal Report ref 240323/S Wilkinson Version 1 dated 22 May 2024 by Consibee, Planting Schedule GPB-HIG-SCH-0001 Rev P01 dated 18/07/2024 by Gustafson Porter + Bowman, LANDSCAPE SOIL MANAGEMENT STRATEGY REPORT TOHA/24/8209/MH Rev 02 by Tim O'Hare Associates LLP, Highgate Cemetery Landscape Masterplan Maintenance & Management Plan dated November 2024 by Gustafson Porter + Bowman, Socio-economic Assessment by Useful Projects dated 21 August 2024, HIGHGATE CEMETERY: THE FUNERARY STRUCTURES, MAUSOLEA AND SUNDRY LISTED BUILDINGS RIBA STAGE 3 SCHEDULE OF WORKS by West Scott Architects Issue Preliminary 5: October 2024.

RECOMMENDATION SUMMARY:

- i) **Grant conditional planning permission subject to Section 106 Legal Agreement**
- ii) **Grant listed building consent subject to Section 106 Legal Agreement**

Applicant:

Highgate Cemetery
Swain's Lane
London
N6 6PJ

Agent:

Montagu Evans
70 St Mary Axe
London
EC3A 8BE

ANALYSIS INFORMATION

Land use floorspaces

Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
SUI	Sui Generis Cemetery	355.9	688.3	+ 312.4
Total	All uses	355.9	688.3	+ 312.4

Parking details

Car Type	Existing spaces	Proposed spaces	Difference
Car - General	8	4	-4
Car - Disabled accessible	0	2	+2
Cycle Type	Existing spaces	Proposed spaces	Difference

Cycle – long stay	0	0	0
Cycle – short stay (all uses)	0	10	+10

OFFICER REPORT

Reason for Referral to Committee:

These applications are not considered to fall within the remit of schemes referred to planning committee as defined by the constitution, however, the scheme as originally submitted was (due to floorspace), and the Council had been working and advising objectors on that basis. So, although Project 6 (the gardeners/ mound building) has now been omitted it is considered appropriate to continue following that anticipated procedure (taking the application below the threshold for committee referral).

For this reason, the Director of Economy, Regeneration and Investment has used their powers to refer this scheme to planning committee.

EXECUTIVE SUMMARY

- i) The site operates both as a working cemetery and a visitor attraction. It has many designations including being a Grade I Listed registered park and garden housing numerous listed structures and monuments, Metropolitan Open Land (MOL), Highgate Village Conservation Area, Highgate Neighbourhood Forum/Plan Area, Site of Importance for Nature Conservation (SINC).
- ii) The Cemetery is highly vegetated and has been stewarded since the 1950s under a 'managed neglect/romantic decay' approach. It is noted that this approach has become unsustainable due to vegetation and self-seeded trees causing damage to graves and monuments. There is a recognised need to start actively managing the site to a greater extent to overcome the issues that have arisen from the cemetery's state of romantic decline. There is also a need for restorative works to heritage assets and a need to improve facilities to serve the site's function as both a working cemetery and a visitor attraction. There are other issues such as flooding and accessibility that need to be addressed.
- iii) The proposal includes the following new buildings which have been simplified and tabled for clarity:

New buildings		
<i>Proposed:</i>	<i>To replace existing:</i>	<i>Location</i>
Visitor and operation buildings	Shipping containers	West cemetery
Buildings replacing other buildings		
<i>Proposed:</i>	<i>To replace existing:</i>	<i>Location</i>
Community/ education building	Gardener's building	East cemetery
Courtyard Store	WC block	West cemetery

- iv) The scheme proposes much improvement and represents overall heritage and ecological enhancement of the site but is also considered to cause MOL harm. MOL has the same level of protection in planning policy as greenbelt, it should be given substantial weight in decision making and development (deemed to be 'inappropriate development') should only be permitted on MOL in 'very special circumstances'. In this case officers consider that there are very special circumstances and harm is outweighed by other considerations in particular the cemetery's historical and ecological significance, the long-term cost of not intervening in its state of decline and the dual nature of the site as both a working cemetery and also as a world-renowned visitor attraction.
- v) Although the application will cause some harm in terms of development on Metropolitan Open Land (MOL) and its impact on openness, this impact has been significantly reduced by a revision to the scheme to omit Project 6. The masterplan originally included a new gardener's building in the east side of the cemetery (also known as Project 6 or the mound building) which has since been omitted for further consideration due to significant objection primarily from grave owners.
- vi) Due to decline, substantial intervention is necessary to restore the cemetery and ensure its successful management going forward. Overall, the works proposed represent heritage enhancement and the harm caused to the openness of MOL is considered outweighed by the public benefits the scheme would offer.
- vii) The key benefits of the scheme are:
- Heritage benefits of securing the repair, restoration and preservation of the Cemetery, its monuments and buildings and other artefacts and their setting for the public benefit;
 - Public and economic benefits of ensuring the cemetery can sustainably continue to function as a public burial ground and visitor attraction;
 - Public benefits of community and education space provision;
 - Climate/sustainability benefits of resilience for the landscape and increased biodiversity; and
 - Public realm, accessibility and transport improvements.
- viii) The application involves extensive landscaping works to improve the site in terms of increasing the variety of trees and ensuring it is climate resilient. This will be informed in part by historic planting information and is also intended to increase biodiversity across the site. Drainage and flooding issues will be addressed across both cemeteries using a variety of methods bearing in mind tree protection zones and areas of poorer soil filtration rates. Accessibility across the site will be improved by relaying paths, adding handrails, removing steps where possible and having designated mobility scooter storage. The scheme is not considered to present any material harm to neighbour amenity, nor do the basement extension works on the east side of the cemetery cause concern.
- ix) The scheme is not considered to present harm in terms of policy objectives and is considered to comply with the development plan as a whole and therefore is recommended for approval.

1. SITE AND BACKGROUND

Designations

- 1.0 The following are the most relevant designations or constraints:

Designation	Details
Grade I Listed Park and Garden	
Conservation Area	Highgate Village
Metropolitan Open Land (MOL)	
Neighbourhood Area and Forum	Highgate
Neighbourhood Plan	Highgate
Site of Importance for Nature Conservation (SINC)	
Underground development constraints and considerations	<ul style="list-style-type: none">- Historically flooded street (Swain's Lane)- Surface water flow and flooding- Slope stability- Subterranean groundwater flow
PTAL (Public transport accessibility)	2
STAL (Shared transport availability)	3
Archeological Priority Area	
Land Contamination	Burial Ground

Table 1 - Site designations and constraints

Background history

- 1.1 Highgate Cemetery is one of the 'Magnificent Seven'; the seven large private cemeteries that were established in the mid-19th century to alleviate overcrowding in existing parish burial grounds within London, the result of a rapidly expanding population.
- 1.2 Established by an Act of Parliament in 1836, consecrated in 1839, the first burial took place at Highgate the same year. It was the third of the cemeteries established by the London Cemetery Company, but now one of the most distinguished of the garden cemeteries.
- 1.3 In 1839 Highgate Cemetery comprised solely of what is now referred to as the 'West Cemetery'. In 1854 a further 19 acres to the southeast of the original area, just across Swain's Lane, was bought to form the eastern extension – the 'East Cemetery'; this opened in 1860.

- 1.4 Highgate Cemetery is notable both for some of the people buried there as well as for its architecture, statuary and monuments, and *de facto* status as a romantically neglected green space. The Victorian attitude to death and their enthusiasm for commemorative funerary sculptures and monuments has gifted us a wealth of Gothic tombs and buildings. The combination of architecture, sculpture, landscape, wildlife and vegetation makes Highgate Cemetery a unique historic environment and commemorative space.
- 1.5 The Cemetery suffered gradual decline in the 20th century. By the 1960s, the United Cemetery Company (successors to the London Cemetery Company) had run out of money and in 1975 the Cemetery closed. The same year the Friends of Highgate Cemetery Trust ('the Trust') was set up to remedy the neglect the cemetery had suffered.
- 1.6 The Trust acquired the Cemetery in 1975 and is still responsible for its maintenance and upkeep. Since acquisition, the Cemetery has been maintained by volunteers on behalf of the Trust, but as a result of limited resources maintenance has become managed neglect.
- 1.7 The objective of the Trust to establish and instigate a holistic and more comprehensive approach to the maintenance and conservation of the Cemetery.

Description

- 1.8 The site is south of Highgate Village, with the Hollylodge Estate to the west and Dartmouth Park to the south. To the east, in Islington, lies Waterlow Park, the Whittington Estate (Highgate New Town) and the Highgate West Mental Health Centre. The site is divided into two parts by Swains Lane which runs north-south, the two parts are known as the West and East Cemeteries. The site is 36 acres in total and slopes steeply downhill in a north-south direction. The West Cemetery is 17 acres (6.8 ha), while the East Cemetery is 19 acres (8 ha). The West Cemetery occupies a south-facing hillside site, slightly downhill from the top of Highgate Hill. In 1854 a further 19 acres to the southeast of the original area, across Swain's Lane, was bought to form the eastern extension – the 'East Cemetery'; this opened in 1860.
- 1.9 To the west and south the site abuts the Hollylodge and Dartmouth Park Conservation Areas which are fairly residential. Nearby residential properties to the west in the Hollylodge Estate range from two to five storeys. To the east the properties backing the site from Dartmouth Park Hill include Highgate West Mental Health Centre which is three-four storeys high, and the Whittington Estate (Highgate New Town) at three-storeys high, which also wraps around to the south of the site onto Raydon Street. Raydon Street then joins Chester Road (to which there is an entrance to the east cemetery, Chester Gate) where the school, library and a few more

residential properties all stand at approximately three or four storeys. North of the site is Highgate Village. The site directly abuts St Michael's Church Highgate and residential properties from two-five storeys on Swain's Lane, Bacon Lane and Highgate West Hill.

- 1.10 Over time the Cemetery has become a significant visitor attraction, due a combination of its charming landscape of romantic neglect and grand funerary architecture. The Highgate Neighbourhood Plan refers to '*the world-renowned intrigue offered by the Cemetery*'. It attracts a significant number of visitors each year, peaking at 103,290 tourists in 2019, and reaching 103,000 again in 2023-24 after COVID, and projected to be 110,000 by 2028/29.

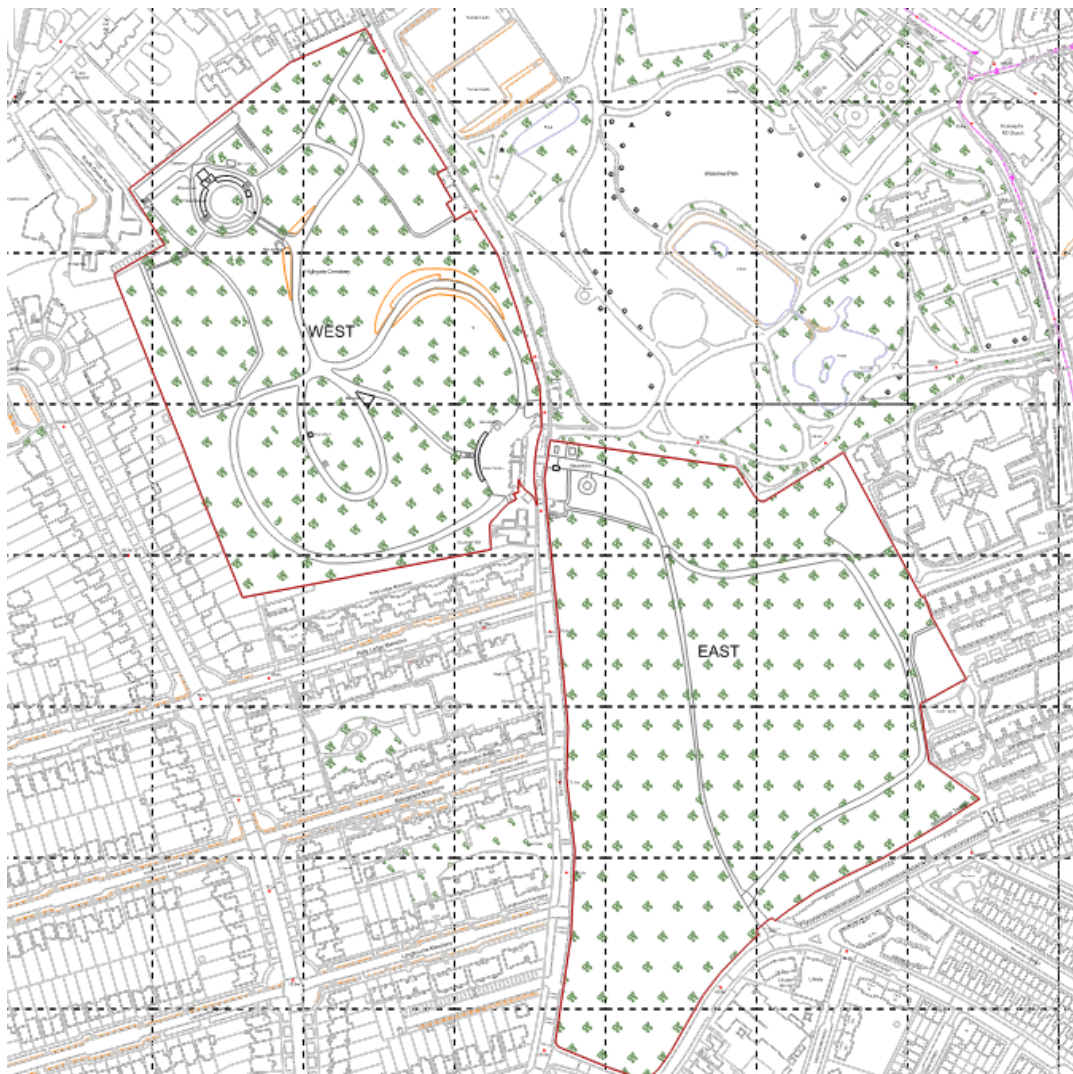


Figure A: Site plan with structures annotated

- 1.11 The site itself is divided into two halves: west and east cemeteries. Both sides are still used as active cemeteries although there are more active burials on the east side. The West is more enclosed and wooded in character and has some of the grander monuments and mausolea, including the terrace catacombs, The Egyptian Avenue and Circle of Lebanon.

- 1.12 The existing buildings are clustered around the entrances on Swain's Lane but there is also a very small building, the north lodge, at the northern corner of the west cemetery against the boundary with Swains Lane. Buildings on the west side around the courtyard include the listed chapel (comprising of two parts: the Anglican chapel – used as a religious space and meeting room and Dissenters chapel - used as offices), a WC block and the south lodge (a historic building used as the Sextons office and volunteer mess space). On the east side, there is a small ticket office on entry and a gardener's building (one storey with a pitched roof and basement) just south, adjacent to the boundary with Swain's Lane.
- 1.13 In terms of policy designations covering the surrounding adjacent areas (other than those above in Table 1), the site lies east of the Holly Lodge Estate Conservation Area and north of the Dartmouth Park Conservation Area, two areas of heritage designation. The Dartmouth Park Neighbourhood Plan Area also abuts the site, to the south and south-east.
- 1.14 The Dartmouth Park CA is fairly residential in character, although a library and primary school sit directly opposite the cemetery at its southern boundary. Three CA sub areas adjoin the site: sub area 5 Highgate New Town, 6 The Brookfield Estate and Sub Area 7 Holly Village. The Holly Lodge Estate CA is also chiefly residential. Two character area of the Holly Lodge Estate CA run along the cemetery boundaries: (1) Holly Lodge Gardens and (3) Mansion Block.
- 1.15 The site has a Public Transport Accessibility Level (PTAL) rating of 2 (not easily accessible) it is a 17-minute walk from Archway tube station and can be accessed by bus services from Highgate West Hill to the north, or from Highgate Road to the south.

2. THE PROPOSAL

- 2.0 The proposal is for a 25-year masterplan to revitalise the cemetery. The masterplan includes the erection of two new buildings, the erection of several lesser structures (storage, sentries etc), the renovation of several buildings, a new drainage system and a management strategy for the graves and habitats to prevent further deterioration, increase biodiversity, and create new habitats resilient to future pressures, including climate change. The new structures are considered to all fall under the existing use as they will be ancillary to the cemetery (sui genesis).
- 2.1 In terms of the new buildings, the buildings are referred to in the application as Project 1 (the community and education building), Project 2 (Visitor, Operations and Volunteers Building) and Project 4 (Utility Store). Project 1 will be located in the east cemetery and would replace the existing single storey (plus basement) gardener's building. The new structure would be single storey plus basement, as was the former building, but will also have

a tall pyramidal slate roof. Project 2 will be located in the west cemetery at the south corner of the courtyard adjacent to the Colonnade, on the uphill-side of the southern arterial path (West Carriage Drive). The building is designed to sit sensitively amongst the other courtyard buildings, and to align with the Colonnade. There are several shipping containers by the edge of the West Carriage Drive for temporary storage of equipment which will be removed and replaced by this new building. Project 4 is a single-storey Utility Store for refuse and mobility scooters; it will replace the existing WC block in the courtyard south of the chapel.

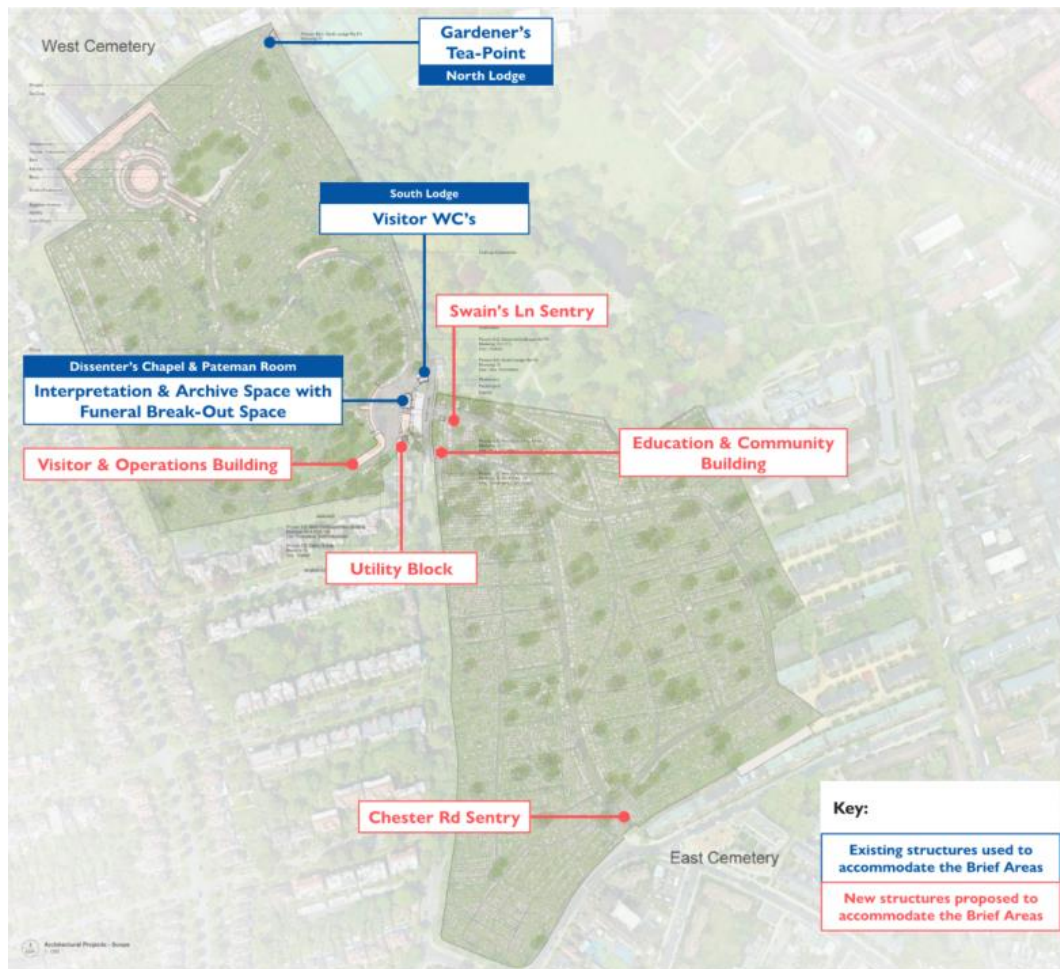


Figure B: Site plan with structures annotated

3. RELEVANT HISTORY

3.0 There are many permissions and consents for small scale works to structures or for new mauslea in the Cemetery, many of which are listed. In more recent years the following are planning permissions have been granted, including associated Listed Building Consents where appropriate:

- **2012/4017/P** – Granted **24/09/2012** – for “Erection of single storey side extension to existing staff building for the provision of public toilets”

- **2013/0398/P** – Granted **06/03/2013** – for “Installation of new metal gates to passageway on the internal (west) elevation of the West cemetery gatehouse [Retrospective]”
- **2015/1013/P** – Granted **14/04/2015** – for “Erection of new stone sepulchre within Highgate West cemetery”
- **2016/2811/P** – Granted **06/07/2016** – for “Removal of free-standing monument to the 9th Duke of St Albans”
- **2017/6534/P** – Granted **22/03/2018** – for “Two freestanding stone columns to be erected either side of the existing sepulchre”
- **2019/0100/P** – Granted **07/01/2020** – for “Alterations to Chester Road entrance of East Cemetery to create gated enclosure for new accessible and secure entrance”
- **2019/3366/P** – Granted **28/10/2019** – for “Erection of mausoleum within West cemetery”
- **2020/3048/P** – Granted **05/01/2021** – for “Removal of trellis and erection of railings to boundary wall section”
- **2021/1943/P** – Granted **08/06/2021** – for “Erection of art installation for temporary period of up to three months.”

3.1 As many of the works do not in themselves also require planning permission, we have allowed many listed building consents for works to listed structures. A list of the most recent consents are set out below:

- **2011/1053/L** – Granted **19/05/2011** – for “Refurbishment of South lodge, west of Highgate Cemetery's boundary wall including roof repair, the removal of roof existing rooflight enclosure and roofing-in of the interstices to form an outside toilet”
- **2011/2297/L** – Granted **18/07/2011** – for “Reinstatement of the plaster vault ceiling in the first bay of Cemetery's Chapel”
- **2012/1696/L** – Granted **29/06/2012** – for “Restoration of dedication plaque to Ashford and Berg memorial”
- **2012/1698/L** – Granted **01/06/2012** – for “Installation of 3x rooflights and removal of internal brick blocking to Mausoleum (Monument to General Sir Loftus Otway)”
- **2012/6039/L** – Granted **24/12/2012** – for “Alterations to vault 4 of the Cutting Catacombs within Highgate (Western) Cemetery”
- **2013/0370/L** – Granted **01/03/2013** – for “Restoration and cleaning of Harry Thornton memorial sculpture”
- **2013/0375/L** – Granted **06/03/2013** – for “Installation of new metal gates to passageway on the internal (west) elevation of the West cemetery gatehouse [Retrospective]”
- **2015/2188/L** – Granted **02/06/2015** – for “Reinstatement of lost iron gates to the Greatorex Mausoleum within the Cuttings Catacombs (Highgate West Cemetery)”

- **2016/2806/L** – Granted **10/08/2016** – for “Part reconstruction of stone steps, installation of handrails to steps, repairs to brickwork and renewal of asphalt roof on a like for like repair basis”
- **2017/5941/L** – Granted **07/12/2017** – for “Paving and landscape works adjacent to Marx memorial”
- **2020/0578/L** – Granted **05/03/2020** – for “Internal alterations to ground floor office”
- **2020/1297/L** – Granted **21/05/2020** – for “Works to restore the monument to Karl Marx damaged by vandals in 2019”
- **2021/1074/L** – Granted **12/05/2021** – for “Replacement of the existing concrete block sarcophagus within the Hanges Mausoleum with a Carrara marble sarcophagus”
- **2023/1585/L** – Granted **31/05/2023** – for “Repairs to cast iron entrance gates”
- **2024/5423/L** – Granted subject to S106 **03/11/2025** – for “Restoration, conservation, demolition, replacement and erection of buildings in East Side and West Side of Highgate Cemetery, including erection of visitor and operations building, erection of a community/education building, and relocation of Perkins monument on the West Side, Cemetery wide landscaping, drainage, public realm, access works and repair of mausolea, to support the function of a working cemetery, visitor and community uses”

3.2 The cemetery site is also the subject of many consents for works to trees, the most recent and wide-ranging of which is:

- **2024/2878/T** - EAST & WEST CEMETERY: Implementation of the Highgate Cemetery Ash Dieback Management Plan. dated 10th July 2024, expiring 10th July 2034 – No Objection to Works to Tree(s) in CA dated **13/08/2024**

4. CONSULTATION

Overview

4.0 The application has undergone two rounds of consultation, an initial consultation when the application was first received in December 2024, and an additional 14-day consultation in September 2025. The additional consultation was taken because the applicant decided to omit a component of the application, Project 6 (the Gardeners/Mound building), and the Council considered it beneficial to ensure the change was made clear to all interested parties. The omission to the scheme was made by the applicant due to significant objection to Project 6 from grave owners, the clear need for further engagement with them regarding this element of the proposal and the need not to delay consideration of the rest of the scheme because of a Heritage Funding deadline.

- 4.1 The notices were initially displayed on 12/12/2024 until 05/01/2025 and the application was advertised in the local paper on 12/12/2024 (expiring 05/01/2025). Multiple groups contacted the Council for extensions of time on the consultation due to the Christmas/New Year period and the vast amount of documentation submitted as part of the application. Whilst there was no formal extension of the consultation period, residents were advised that in line with the Statement of Community Involvement (2024) all representations made throughout the duration of the application would be taken into consideration.
- 4.2 The cemetery also undertook their own consultation over a period of 2 years (starting March 2023) which included a semi-permanent exhibition in the courtyard exhibiting the background and need for the masterplan, workshops, neighbour days, information on their website, local newspaper advertisements and flyers/posters in the local area.

Statutory consultees

Historic England

- 4.3 As part of the first consultation, the consultation response has been summarised as follows:
- Supports the applications on heritage grounds and considers the applications to meet the requirements of the NPPF.
 - Recommends that any grant of planning permission and listed building consent is subject to a number of conditions: Phasing plan outlining the program for delivery of the various works, method statements for works to the chapels and samples of materials and workmanship on site, method statements for works to other funerary and memorial structures, samples of materials and workmanship on site, materials samples for the external elevations of the proposed new buildings, materials samples for proposed pathway surfaces, details of the disposal of any soil that may be displaced as a result of the proposed works (recommend that priority should be given to reuse within the cemetery, with consideration given to where the soil can be stored until it can be used and locations for reuse, such as providing fill in areas affected by settlement), method statements for construction of new pathways and drainage with consideration to securing the safety and stability of neighbouring monuments and burials.
 - Recognises the high significance of Highgate Cemetery, which is a remarkable 19th century funerary landscape containing buildings, structures and burials of great archaeological, architectural and historic interest.
 - Acknowledges the issues that the cemetery is experiencing in relation to the condition and accessibility of the landscape and many of the

buildings within it. Recognises the need to provide a sustainable long-term future for the cemetery that justifies a certain level of change. We therefore support the application proposals, which seek to enable and sustain the cemetery's continued use for burial and commemoration and as a visitor attraction.

- N.B. Many of the proposals have been subject to pre-application discussion and seek to minimise their impact on the historic environment, in accordance with national and local policy.
- We note that the local authority may wish to take forward discussions in relation to the design and scale of the proposed buildings to further reduce any impacts that these may have. We would be happy to participate in those discussions.

Officer response: Noted. Historic England's recommended conditions have been incorporated into the application conditions should it be approved.

- 4.4 In terms of the second consultation, Historic England confirmed they had no additional comments to make in relation to the revised application.

Historic England's Greater London Archaeological Advisory Service (GLAAS).

- 4.5 As part of the first consultation, the consultation response has been summarised as follows:

- 4.6 Comments were made as follows:

- In agreement with conclusions of the Archaeological Desk Based Assessment submitted in support of the application (MOLA, 2024) and previous evaluation - unlikely that a large number of burials will be disturbed through the proposed new buildings. However, there remains the potential for human remains or associated burial structures outside of the areas recorded for graves, and for earlier archaeology beneath the burial horizon. As such, it is recommended the groundworks are archaeologically monitored and this should be secured by condition.
- The Tree Planting Method Statement indicates that locations with recorded burials deeper than 2.6 feet will be considered 'low potential' for new tree planting. While this is positive it does not describe the methodology that will be employed if human remains are discovered in the process of tree planting.
- Recommended that Written Scheme of Investigation makes specific provision for identifying when archaeologists will be involved in the tree-planting protocols and how discoveries of human remains or other archaeological features will be managed, including by modifying planting proposals to minimise harm. These procedures and contingencies can be detailed in a Written Scheme of Investigation submitted prior to the works commencing.

Officer response: Noted. The recommended condition has been added, should the application be approved.

- 4.7 In terms of the second consultation, Historic England GLAAS confirmed they had no additional comments to make in relation to the application revision.

Highgate Neighbourhood Forum

- 4.8 As part of the second consultation, comments of support were received as follows:

- Support the revised application.
- Comprehensive consultation with the wider Highgate community.
- Enhancement of biodiversity and enthusiasm to connect to Highgate's other wildlife corridors appreciated.
- The cemetery forms an important part of Highgate's economic survival with the thousands of visitors it brings. We therefore support plans to sensitively restore and enhance visitor experience.
- Consider the omission of the gardeners' building an appropriate move.

- 4.9 As well as this, the Highgate Neighbourhood Forum also submitted a joint representation with the Dartmouth Park Neighbourhood Forum and Highgate Society as outlined below:

- As the representatives of Highgate's major community groups, we wish it to be known that we strongly support the current planning application for Highgate Cemetery's conservation masterplan as it will serve the community of local groups, visitors and grave owners through providing desperately-needed conservation works and enhancements to biodiversity, landscaping and preservation of historic monuments, protecting the Cemetery for decades to come.
- Appreciate the substantial efforts the Friends of Highgate Cemetery Trust has made to engage with the community over the past five years. Our members have variously attended neighbour days organised by the trust, viewed the long-running exhibitions at the entrance to the Cemetery, attended presentations by the Cemetery and their Architects and participated in Community Liaison Group meetings. We are pleased to see the Cemetery management considering community needs so strongly in the proposals. In particular, we are very pleased by the plans for the Community and Education Building, which will have a very real benefit for local groups, as well as landscaping works to improve the accessibility of paths, which will benefit local people, grave owners and visitors alike.
- While we are aware of the concerns of Mound grave owners, this application has been amended to omit the Gardeners' Building in direct response to feedback from this group. Consequently, we believe their objections are without foundation. We note it is vital for the future of the Cemetery that National Lottery Heritage Funding is received to enable

conservation works to begin. The conservation masterplan should be approved in a timely manner in order for this funding to be realised.

- We believe that refusal to consent this application could ultimately risk a viable future for this key and treasured local asset, harming all those who benefit from it. We ask the committee to approve this scheme to allow critical conservation work to progress.

Officer response: Noted.

Dartmouth Park Neighbourhood Forum

4.10 As part of the second consultation, comments of support were received as follows:

- We continue to support this application, which we consider to be thoughtfully designed, and to be socially and culturally very important. It was correct of the applicant to exclude the gardeners' shed in the amended application.

Officer response: Noted.

4.11 As well as this, the DFNF also submitted a joint representation with the Highgate Neighbourhood Forum and Highgate Society as outlined in section 4.9.

National Amenity Societies

4.12 The National Amenity Societies casework unit was consulted as statutory consultees but responses were received only from The Victorian Society and The Gardens Trust, as below.

The Gardens Trust

4.13 In the first consultation, comments of support covered the following:

- The application has a material impact on the significance of Highgate Cemetery, an historic designed landscape which is Registered by Historic England at Grade I. The inclusion of this site on this statutory register requires great weight to be given to its conservation. We have liaised with our colleagues in London Parks and Gardens to prepare this joint response.
- We support the proposals which encompass a wide range of buildings and landscape interventions to provide a long term strategy for the site. The overall plan provides well thought through and sensitive solutions, underpinned by high quality design for each building. These will support conservation, restoration, ongoing maintenance and visitor services for the cemetery as a whole.
- The proposed new buildings are sensitively located so that they will not detract from the significance of the landscape. In some instances, such as

the Project 6: East Side Mound Building /Gardener's Building, it may help articulate such areas which are of less significance, receive fewer visitors and provide vital facilities to maintain the landscape.

- Adaptations for the main entrance buildings will allow new uses for these, and support understanding of the whole site design and its significance, but we leave it to others to comment on the architectural details.
- Landscape proposals work for both ecological enhancement and the historic significance of the cemetery, re-opening views where appropriate.

Officer response:

- *Noted*

- 4.14 In regard to the second consultation, The Gardens Trust confirmed they do not wish to make comment.

The Victorian Society

- 4.15 As part of the first consultation, a response was received as follows:

- We would like to express support for the proposals which include the restoration and conservation of the site.
- The proposals have been carefully considered and demonstrate a high standard of restoration and conservation. The proposed buildings are sympathetic in their form and the chosen materials help in creating a cohesive relationship between the extant buildings and the proposed. The reinstatement of historic features including the pinnacles and cupola to the Chapels, the restoration of the obelisk to the Egyptian Avenue and the lowering of the courtyard to reveal the base of the Colonnade will contribute to enhancing the architectural significance of the site. Further to this, the plans to increase and improve public access will allow such improvements to be appreciated and experienced.
- It is clear that a sensitive approach, which aims to prevent excessive restoration of the cemetery and preserve its historic character, has driven the proposals and is an ethos that is present throughout.
- Support for the proposed improvements to drainage, footpaths, and the restoration of views toward St Paul's Cathedral.

Officer response: Noted

Local groups

Highgate CAAC

- 4.16 In relation to the first consultation, responses were received January 2025 (first bullet point) and February 2025 (second bullet point):

- Very grateful for the community engagement which has taken place. A greater variety of planting would be of benefit to all.
- Extremely supportive but object on the following points: 1. Location of the proposed ticket office on the West side is not obvious and likely not big enough. 2. Ticket office queue would clash with the cafe entrance and the cafe would not be accessible to disabled people. The cafe is very small and expected to spill out outside with tables/umbrellas, children running about etc which may affect the reflective ambience of the Cemetery.

Officer response:

- *Noted.*
- *1. The ticket office in the west cemetery is for checking tickets rather than for purchasing tickets (and is the location currently used for checking tickets), it is in one's immediate sightline as you enter the courtyard and so should be clear. 2. The café will have level access and be accessible. The ticket office queue will be managed by the cemetery and queue barriers can be used if necessary to avoid obstruction. The cemetery will continue to manage the different groups of people that visit the cemetery and the different needs. Although it is a careful balance, unnecessarily large buildings in this sensitive, historic, MOL (Metropolitan Open Land) landscape are not supported, especially when at certain times of the year visitor numbers may be small. In terms of extra activity around the café, people will be able to sit outside as is the case currently with the chairs and tables in the courtyard near the coffee van. There is no proposed increase in the number of external tables, rather the proposal will introduce the option of sitting inside. Please see sections 9.9 - 9.11 on this topic.*

Highgate Society

4.17 The same comments of support were submitted in both the first and second consultation, as bulleted below. As well as this, the Highgate Society also submitted a joint representation with the Highgate and Dartmouth Park Neighbourhood Forums as outlined in section 4.9.

- The cemetery and their agents have worked closely with the community, and the results reflect the effort that has been put in.
- Excellent scheme which effectively resolves the various and often conflicting needs for operational improvements whilst preserving and enhancing the buildings and their setting.
- Consider the omission of the gardeners' building to be appropriate.

Officer response: Noted

The Association of Grave Owners of The Mound

- 4.18 In objection to Project 6 (which was initially included in the application) a number of grave owners on the mound formed a group. There are 48 members of the association. Before this, collaborative effort between grave owners to communicate their concerns was referred to as 'Friends of the Mound'. As well as objecting to the building itself (mass, design, blocking outlook toward the rest of cemetery, disturbance to mourners etc), the objection was also in relation to the lack of notification from the cemetery to their internal stakeholders (grave owners), about the mound proposal. When the grave owners became aware of the proposals the application had been in for a number of months and the formal consultation period had ended.
- 4.19 Following objections from the group, the Trust and officer met with the Grave owner on-site to better understand their concerns. As part of the first consultation, the group prepared a detailed submission identifying potential alternative sites for the facilities which were to be housed in the mound building. Officers reviewed all the different sites with the group and following further discussion with the Trust, the decision was made to omit this element of the proposal from the scheme. The facilities to accommodate the gardener's compound are still needed. There will need to be further engagement between all parties to review options for providing them.
- 4.20 As part of the second consultation, a significant number of objections were received from members of the group, the main grounds of which are summarised below:
- Concern regarding likely re-application for Project 6 in the future and the lack of flexibility elsewhere in the masterplan (if this application is approved) to accommodate some of the needed facilities.
 - Erosion of trust in relation to omission of Project 6 and proposed collaboration going forward to find resolution.
 - Failure of notification and consultation – in relation to the application (and/or mound building) generally.
 - Disregard of Technical Evidence - Grave owners have already prepared detailed analyses of alternative sites and have responded to the architect's proposals (Documents: Alternative Sites dated May 2025 and Grave Owners' Response to the Architects' Report dated August 2025. Despite their detail and rigour, the Trust has not engaged with them in any meaningful way but rather they have been ignored or dismissed.
 - Flaws in the Collaborative Approach Proposal including: a) the Unnecessarily Long and Protracted Timetable, b) Absence of a Revised Brief, Questionable Relevance of Community Representatives, c) Exclusion of Professional Teams, d) No Role for Gardeners or Staff, e) Lack of Planning Guidance, f) Retention of Decision-Making by the Trust, g) Failure to Engage with Existing Evidence, h) Systemic Concerns,

i) Opaque Evaluation Criteria, j) Risk of Decision by Attrition, k) No Safeguards Against Repetition.

- Despite the flaws identified above the association are still committed to pursuing a genuinely collaborative way forward and suggest steps necessary to ensure this
- Constructive Proposals for Improvement: 1. Independent Technical Assessment, 2. Clear Revised Statement of Need, 3. Inclusion of Gardeners and Staff, 4. Planning and Heritage Guidance, 5. Honesty about Decision-Making, 6. Camden Council Split Decision

Officer response: The Council and applicant are aware of the concerns raised and the alternative sites suggested for Project 6. The issue is not yet resolved and therefore Project 6 (the gardeners/mound building) has since been omitted from the scheme to allow for time to consult and review in more detail. The decision has been made to omit this element of their scheme and consider the objections to Project 6 and possible resolution in more detail. While concerns are understood, a future application could be made to vary any existing permission. It is not considered that making a decision on the remaining proposals would jeopardise or limit potential options for accommodating the gardeners' facilities.

Growing Green Climate Action CIC (local community non-profit working to increase urban biodiversity in the Dartmouth Park/Highgate area)

4.21 Support with the following comment:

1. We were part of the community consultation group undertaken by the Cemetery in 2024. We are very supportive of the application with respect to the planned wildlife habitats, treatment of ground water and flood mitigation. We hope that these elements can be scheduled as early in the project as possible to benefit wildlife in the local area.

Officer response: Noted.

London Borough of Islington

4.22 The LBI confirmed they had no comment for both the first and second consultation

MP Jeremy Corbyn

4.23 As part of the first consultation, comment was received covering the following issue:

Lack of proper consultation in relation to Project 6 (the gardeners/mound building). Construction should be paused while grave owners are consulted.

Officer response: The applicant has since omitted Project 6 (the gardeners/mound building) from the scheme in order to consult and review in more detail.

4.24 No further comments were received as part of the second consultation.

Adjoining occupiers

4.25 In terms of the Council's consultation, site notices were displayed on 12/12/2024 until 05/01/2025 and the application was advertised in the local paper on 12/12/2024 (expiring 05/01/2025). Multiple groups contacted the Council for extensions of time on the consultation due to the Christmas/New Year period and the vast amount of documentation submitted as part of the application. Whilst the formal consultation period was not extended, they were advised that in line with the Statement of Community Involvement (2024) all representations would be taken into consideration even if they were submitted after that period.

4.26 Following the applicant's decision to omit Project 6 of the masterplan, the Council felt a 14-day re-consultation would be beneficial to ensure this decision was made clear to all interested parties. The consultation notices were displayed on 04/09/2025 until 19/09/2025 and the application was advertised in the local paper again on 04/09/2025 (expiring 19/09/2025).

4.27 Both consultations involved site notices and press notices. 50 sites notice were displayed in the vicinity surrounding the perimeter of the cemetery, including by the entrances of the cemetery and the surrounding residential roads.

4.28 Overall, objections were received from at least 101 local households. The objections received by the Council are on the Council's website. The key issues raised were in relation to Project 6 (the mound/gardener's building) which has since been omitted from the scheme. The following responses were received from individuals:

- First consultation (Dec 2024): Support 21, Object 101
- Second consultation (Sept 2025): Support 104, Object 53

A number of objections were submitted in relation to Project 6 (the gardeners/mound building).

4.29 These included the following grounds:

- Impact on the open character of the East Cemetery.
- Impact on the Mound (loss of peace and serenity with vehicle/people movement).

- Design and scale of the proposed Gardeners' Building - substantial utilitarian building (some suggest a single storey building would be more suitable).
- Would block the view over cemetery isolating the mound area from the rest of the cemetery.
- Design does not align with the proposed English garden wall concept.
- Visuals are misleading and show the proposed Gardeners' building much smaller than its actual size (mock-up scale comparison submitted and also demonstrated to officers on site).
- The building, as proposed/drawn does not fit within the actual spatial constraints of the embankment.
- The Mound is probably the most visited part of the cemetery by grave owners and mourning families, it is new and the burials are recent.
- Gardeners' accommodation should be provided at their current location near the entrance to the East Cemetery.
- Path is too narrow for regular vehicle access.
- Construction challenges/feasibility (site is equidistant from both entrances, with limited access for large construction vehicles).
- Any value engineering would have serious implications.
- Alternative sites/designs need to be looked into e.g. sites nearer the entrances or site perimeter, or consolidating facilities within the other buildings.
- Objection to the Community and Education Building (Project 1), which can be provided elsewhere in the Cemetery without replacing a necessary use (gardeners building) from its most appropriate location.
- Limited access to the mound during construction (mourners, the disabled, pallbearers, for burials and maintenance).
- Risk of disturbance to graves which are very close to the construction margin.
- What about the historic burials/common graves undocumented beneath the mound?
- Shading and environmental effects on landscaping/ecology - substantial shade over grave sites, particularly in winter, effecting grave planting etc.
- Violation of the sanctity of the mound.
- Failure to notify grave owners about the proposals in good time (or include them in working groups as stakeholders). Failure to put up signage where the building would be located.
- Against MOL policy, Undermining Grade I Listed Landscape Character.
- Failure to suitably revise proposals in line with Design Review Panel comments.
- Facilities could be broken down into smaller buildings with less impact.
- A policy-based objection was submitted analysing the application in relation to planning policy (including MOL policy and the local

Conservation Area Appraisal etc). It also presented a rebuttal to assertions made in the applicant's DAS and Planning Statement.

Officer response: The applicant has since omitted Project 6 (the gardeners/mound building) from the scheme in order to consult and review in more detail. As this is now no longer part of the proposal these objections have not been addressed here but they are noted and will be taken into consideration by officers in future discussions regarding this aspect of the proposal.

A number of objections were submitted in relation to the subsequent omission of Project 6 (the gardeners/mound building).

4.30 The nature of the concerns raised are summarised below:

- Masterplan is no longer comprehensive. Statement of Need no longer complete/valid.
- Future re-application for Project 6 is very likely and there will be a lack of flexibility elsewhere in the masterplan at that point (if already approved) to accommodate some of the needed facilities or consider alternative compilations. I.e. This defers the dispute while closing off alternatives.
- Suggested split decision (refuse the mound building and approve the rest of the masterplan).
- A rebuttal was received to the Statement of Community Involvement Addendum submitted as part of the new revised documents (with the omission of Project 6). It argued lack of impartiality shown by LCA the public relations consultant who wrote the document, misrepresentation of the timeline of communication from the Trust, a misrepresentation of the 3rd June 2025 meeting, omission of grave owner's submissions and concern regarding whether the working group proposed will be impartial and meaningful for stakeholders etc.

Officer response: These concerns are noted, however it is the applicant's decision to omit this element of their scheme, a decision that was made in response to the significant objections raised, the challenge of an impending funding deadline and current lack of resolution regarding Project 6. While concerns are understood, the masterplan if granted could be varied with a subsequent planning permission. It is not considered that a decision on the remaining part of the project would be premature, jeopardise or reduce the options for Project 6.

5. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2024 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

London Plan 2021 (LP)

[D4 Delivering good design](#)

[D5 Inclusive design](#)

[D8 Public realm](#)

[D10 Basement development](#)

[D14 Noise](#)

[S7 Burial space](#)

[E10 Visitor infrastructure](#)

[HC1 Heritage conservation and growth](#)

[HC2 World Heritage Sites](#)

[HC3 Strategic and Local Views](#)

[HC4 London View Management Framework](#)

[HC5 Supporting London's culture and creative industries](#)

[G1 Green infrastructure](#)

[G2 London's Green Belt](#)

[G3 Metropolitan Open Land](#)

[G4 Open space](#)

[G5 Urban greening](#)

[G6 Biodiversity and access to nature](#)

[T3 Transport capacity, connectivity and safeguarding](#)

[T4 Assessing and mitigating transport impacts](#)

[T5 Cycling](#)

[T6 Car parking](#)

[T6.5 Non-residential disabled persons parking](#)

[T7 Deliveries, servicing and construction](#)

[T9 Funding transport infrastructure through planning](#)

London Plan Guidance (LPG)

[Accessible London SPG](#)

[Planning for Equality and Diversity in London SPG](#)

[London View Management Framework SPG](#)

[All London Green Grid SPG](#)

Local policy and guidance

Camden Local Plan (2017) (CLP)

[Policy G1 Delivery and location of growth](#)

[Policy C1 Health and wellbeing](#)

[Policy C2 Community facilities](#)

[Policy C3 Cultural and leisure facilities](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E3 Tourism](#)

[Policy A1 Managing the impact of development](#)

[Policy A2 Open space](#)

[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)

[Policy A5 Basements](#)

[Policy D1 Design](#)
[Policy D2 Heritage](#)
[Policy CC1 Climate change mitigation](#)
[Policy CC2 Adapting to climate change](#)
[Policy CC3 Water and flooding](#)
[Policy CC5 Waste](#)
[Policy T1 Prioritising walking, cycling and public transport](#)
[Policy T2 Parking and car-free development](#)
[Policy T3 Transport infrastructure](#)
[Policy T4 Sustainable movement of goods and materials](#)
[Policy DM1 Delivery and monitoring](#)

Highgate Neighbourhood Plan (2017)

[Policy SC2: Community Facilities](#)
[Policy TR1: Promoting Sustainable Movement](#)
[Policy TR2: Movement of Heavy Goods Vehicles](#)
[Policy TR3: Minimising the Impact of Traffic Arising from New Development](#)
[Policy TR5: Dropped Kerbs and Cross-overs](#)
[Policy OS1: Highgate's Major Open Spaces](#)
[Policy OS2: Protection of Trees and Mature Vegetation](#)
[Policy OS3: Local Green Space](#)
[Policy OS4: Biodiversity and Highgate's Green Grid](#)
[Policy DH1: Demolition in Highgate's Conservation Areas](#)
[Policy DH2: Development Proposals in Highgate's Conservation Areas](#)
[Policy DH6: Front Boundaries](#)
[Policy DH7: Basements](#)
[Policy DH8: Refuse Storage](#)
[Policy DH11: Archaeology](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Access for All CPG - March 2019](#)
[Amenity - January 2021](#)
[Artworks, statues and memorials CPG - March 2019](#)
[Basements - January 2021](#)
[Biodiversity CPG - March 2018](#)
[Community uses, leisure and pubs - January 2021](#)
[Design - January 2021](#)
[Developer Contribution CPG - March 2019](#)
[Energy efficiency and adaptation - January 2021](#)
[Public open space - January 2021](#)
[Transport - January 2021](#)
[Trees CPG - March 2019](#)
[Water and flooding CPG - March 2019](#)

Other guidance:

[Highgate Conservation Area Appraisal and Management Proposals \(2007\)](#)
[Dartmouth Park Conservation Area Appraisal and Management Statement \(2009\)](#)

Draft Camden Local Plan

The council published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation in January 2024. Responses to the consultation and a Submission Draft Camden Local Plan (updated to take account of the responses) was reported to Cabinet on 2 April 2025 and the Council on 7 April 2025. The Council resolved to agree the Submission Draft Local Plan for publication and submission to the government for examination (following a further period of consultation), and the Submission Draft has now been submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination.

The Submission Draft is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

6. ASSESSMENT

- 6.0 The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Land Use
8	Design & Heritage
9	Neighbour Amenity
10	Sustainability and Energy
11	Trees, Greening and Biodiversity
12	Transport
13	Basement
14	Flood Risk and Drainage
15	Community Infrastructure Levy (CIL)

7. LAND USE

Proposed uses

- 7.0 Highgate Cemetery is considered both a working cemetery and a visitor attraction. In terms of planning use class, it is considered sui generis (cemetery). All the works proposed are considered to be ancillary to the cemetery and form part of that planning unit, however the new community and education building on the east side of the cemetery will also have a

wider community function. The building will be available at discounted rates to local community groups and will be controlled with a Community Use Management Plan secured via the section 106 legal agreement. This is considered to be a public benefit.

- 7.1 The proposal will deliver improved facilities to this significant historical and ecological attraction and secure its future in the long term, which is important in terms of supporting the local economy, tourism and the borough's cultural offer. In this regard it supports the objectives of Local Plan policies C3, E1 and E3.

Metropolitan Open Land

- 7.2 The assessment of land use in this case also needs to take into account the Metropolitan Open Land policy designation and the principle of development, as expanded on below.

London Policy

- 7.3 The Metropolitan Open Land is a policy designation that is reflected in the London Plan and afforded a similar status and level of protection as Green Belt. The London Plan Policy G3, Part A sets out that:

“1. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt;

2. boroughs should work with partners to enhance the quality and range of uses of MOL.”

National Policy

- 7.4 Section 13 of the NPPF deals with the policy protection of the Green Belt. Paragraph 142 notes that the Government attaches great importance to the preservation of the open quality of Green Belt land, and its purpose of preventing urban sprawl by keeping land permanently open with the **essential characteristics being openness and permanence**.

- 7.5 Paragraph 151 requires local authorities to plan positively to enhance their beneficial use, such as looking for opportunities to provide access, opportunities for outdoor sport and recreation, retain and enhance landscapes, visual amenity and biodiversity, as well as improved damaged/derelict land.

- 7.6 Paragraphs 153 to 160 set the process for considering proposals affecting Green Belt. Paragraph 153 identifies that:

“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green

Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

- 7.7 Development should be regarded by Paragraph 154 as inappropriate. However, relevant exceptions to this include (so essentially appropriate development):

*“a) the provision of **appropriate facilities** (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, **cemeteries and burial grounds** and allotments; **as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;***

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

g) limited infilling or the partial or complete redevelopment of previously developed land, land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

- 7.8 It is noted that any development in Highgate Cemetery, needs to be either appropriate to the existing use of the land and to preserve the openness of the land, or, if judged as inappropriate, should only be approved in very special circumstances.

Local policy

- 7.9 Camden Local Plan Policy A2 (Open Space) seeks to protect, enhance and improve access to Camden’s parks, open spaces and other green infrastructure. Part (g) of the policy sets out that the LPA will give strong protection to maintaining openness and character of the MOL. The supporting text (Paragraph 6.40) identifies that it will protect the MOL in accordance with the London Plan and the NPPF policies on green belts.

- 7.10 However, the Policy also notes at part (c) that the LPA will:

“exceptionally, and where it meets a demonstrable need, support small scale development which is associated with the use of the land as open space and contributes to its use and enjoyment by the public.”

- 7.11 Highgate Neighbourhood Plan seeks to improve areas of the MOL which are currently in unfavourable or declining condition through complementary decision-making relating to the use of adjacent sites (Core objective 4 -

Open Spaces and Public Realm). It does not provide any additional policy on MOL development but does state that development adjacent to Highgate's major open spaces (including the cemetery) should respect its setting and not be visually intrusive. The Plan also refers to the open space of Highgate Cemetery as one of the local *multifunctional* areas of outstanding importance (emphasis added).

MOL Assessment

- 7.12 The Council consider that not all of the new building uses proposed may be considered 'appropriate uses' for the function of a cemetery, as outlined in MOL policy. There are elements of the scheme which are considered to involve inappropriate development and as a result the development proposals as a whole would need to be treated as involving inappropriate development.
- 7.13 However, as set out in paragraph 153 of the NPPF, if very special circumstances are identified development may be approved. In this case, potential harm to the MOL (by reason of inappropriateness, and any other harm resulting from the proposal) must be clearly outweighed by other considerations.
- 7.14 The uses of both Projects 1 and 2 (community and education space, café, offices, volunteer space) are not considered appropriate for the purposes of MOL and Local Plan Open Space policy A2. Whilst they relate to the existing use of the land as a burial ground they have a wider function which is about connecting the cemetery to the community and supporting its role as a historic attraction for visitors to London.
- 7.15 In terms of assessing the level of harm to the MOL of these elements, albeit already judged inappropriate, any additional built form in the cemetery, by its nature, would impact the site's sense of openness. Although on the site of an existing building, the height of the roof of the new Community and Education building (Project 1), is considered likely to have a limited harmful impact on the openness of the cemetery (the existing building is not highly visible above the cemetery wall from Swain's Lane whereas this one will be, on account of the roof form). The new Visitor, Volunteer and Education Building (Project 2), although designed to sit sympathetically amongst the built forms in the courtyard and set down in the earth to mitigate its rise in height, is also considered to impact the cemetery's sense of openness, by nature of being a building where previously there was not one. Although it is noted there have been unsightly shipping containers on this site for a significant period of time (which the new building would replace) it is noted that these appear temporary by nature and are not immediately visible from the courtyard as the new building will be and are not immediately visible from the courtyard as the new building will be.

- 7.16 It is however noted that as an individual component of the masterplan the new Utility Store in the courtyard (Project 4) is considered an appropriate use to a cemetery (refuse and mobility scooter storage). Neither is it considered to harm the openness of the MOL being on the site of a similar existing single-storey structure (WC block). Although larger than the existing structure, it is still considered modest in size and sited on the site of an existing store on the courtyard which is already a built area.
- 7.17 For the reasons discussed above, overall, the application presents a conflict with the MOL designation and Open Space policy.
- 7.18 However, the unusual dual nature and significance of Highgate Cemetery as both a working cemetery and visitor attraction is considered in this case to constitute 'very special circumstances' as required by policy to justify inappropriate development in MOL. The Cemetery attracts a significant number of visitors each year (peaking at 103,290 tourists in 2019, and reaching 103,000 again in 2023-24 after COVID, and projected to be 110,000 by 2028/29).
- 7.19 The MOL designation is intended to strategically protect sites of landscape, recreation, nature conservation and scientific interest for continued use and enjoyment. Highgate Cemetery is significant on multiple levels and the landscape studded with funerary monuments and related structures is central to its identity and protected character. The proposed works within Highgate Cemetery support the MOL designation in that the objective is to enhance the facilities and user experience through the stewardship and enhancement of the historic and ecological context.
- 7.20 There is widespread acknowledgement of the issues that the cemetery is experiencing in relation to the condition and accessibility of the landscape and many of the buildings within it. The need to provide a sustainable long-term future for the cemetery is considered to justify a marked level of change. The cost of not intervening and investing in this deteriorating local and national asset is considered to be harmful its significance.
- 7.21 The maintenance and enhancement of the site, including the development hereby applied for which is deemed 'inappropriate' in relation to MOL policy constraints, is considered to be in the public interest, the interest of the borough, and the local economy, including that of Highgate Village and its conservation area.
- 7.22 The cemetery's very particular characteristics (its physical layout, notable graves and historical importance and its significance as a visitor attraction) combined with the need to address its current circumstances (to secure the restoration and repair of the structures, improvements to the landscape, and to properly provide for the ability to maintain the cemetery and to cater for visitors) are considered to constitute very special circumstances that clearly

outweigh the harm to MOL through inappropriateness, with the proposals delivering the following key benefits:

- Overall heritage benefits of the wider masterplan: securing the repair, restoration and preservation of the Cemetery, its monuments and buildings and other artefacts and their setting for the public benefit;
- Public and economic benefits of ensuring the cemetery can sustainably continue to function as a public burial ground and visitor attraction;
- Public benefits of community and education space provision;

7.23 In addition to these, there are also additional lesser benefits such as the climate/sustainability aims of the wider masterplan which include resilience for the landscape and increased biodiversity. The scheme would also provide public realm enhancements in the immediate vicinity and improve accessibility.

8. DESIGN & HERITAGE

Legislative background

The Planning (Listed Buildings and Conservation Area) Act 1990

- 8.0 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority 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.
- 8.1 The effect of this section of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of Listed Buildings and their settings. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 16).
- 8.2 The duties imposed by the Listed Buildings Act are in addition to the duty imposed by section 38(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.

The National Planning Policy Framework (NPPF)

- 8.3 The NPPF requires its own exercise to be undertaken as set out in chapter 16 (Conserving and enhancing the historic environment).

Paragraphs 207-216 require consideration as to the impact of a proposed development on the significance of both designated heritage assets and non-designated heritage assets, including an assessment and identification of any harm/the degree of harm. Paragraph 215 states:

‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.’

Local Plan Design Policies

- 8.4 The Local Plan policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- 8.5 The Neighbourhood Plan describes its plan area as attractive and intriguing in character, with high levels of access to both copious areas of open space as well as secluded wooded areas. Although it does not directly comment on development within the cemetery, Policy OS1 states that development adjacent to Highgate’s major open spaces (including the cemetery) should respect its setting and not be visually intrusive. Development should not harm protected views nor be detrimental to the integrity, appearance or setting of the open space in terms of height, scale, massing, use of materials or function. The plan states that concerns include the potential impact that development around the fringes of Highgate’s open space may have on its character and tranquillity.
- 8.6 Although these comments relate to sites adjacent to open space, it is self-evident that the principles would apply within the open spaces themselves with even more weight – if the principle of development was considered acceptable.
- 8.7 The supporting text to Policy OS1 also states *‘Currently, Highgate’s open spaces are special in this regard because the urban built form around them intrudes only minimally on the views into and out of them. This is largely because of the dominant nature of the many mature trees in the vicinity and the subservient scale of development around the periphery of the heaths and parks of the Plan area. This balance should be preserved to ensure that the special character of the open spaces of Highgate, and by extension of Highgate itself, is retained.’*

- 8.8 The Highgate Conservation Area Appraisal and Management Strategy (CAS) highlights the need for intervention in the cemetery, the *'landscape and associated memorials are fragile and vulnerable to the effects of a century of neglect, natural ageing and the aggressive penetration of vibrant plant growth'*. It also highlights the poor condition of some of the boundary walls to both sides of cemetery, and the wearing surface of cracked and distorted asphalt to the pavements on Swain's Lane.

Designated and non-designated heritage assets

- 8.9 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.

Pre-application and DRP

- 8.10 It is noted that the applicant entered into a Planning Performance Agreement with the Council for ongoing pre-application advice from 2022 to 2024 and the design developed in consultation with both the Council and Historic England. The applicant's team for the iterative design process involved a significant number of external consultants including: architect, conservation architect, landscape architect, planning consultant, environmental consultant, archaeology consultant and transport consultant.
- 8.11 The scheme was also reviewed by the independent Design Review Panel in July 2024. The key points of feedback are summarised below and the applicant team's response is noted in brackets:
- Supportive of the proposed use of tamped concrete (for Projects 1,2 and 4) incorporating the re-use of materials from demolished structures, and encourage the development of a stronger collective architectural language for the new - materials and integration with the landscape. (*The applicant has continued with the tamped layered concrete as a material to tie the buildings together visually*).
 - The Visitor and Operations Building (Project 2) main elevation should be adjusted to create a simpler design, with vertical elements that are less prominent, to avoid competing with the adjacent colonnade. The ticket office should be less hidden, and options should be explored to make it more visible to visitors. The West Cemetery Courtyard plan should be re-examined to ensure uses are in the best locations. (*The applicant has revised the façade in line with these comments. Ticket office has been made wider. Applicant notes comment on building locations but considers these to be the best locations given constraints*).
 - The panel thinks that the Education and Community Building needs some rethinking, to make it less enclosed and more welcoming, with a simpler

design that allows users to connect with the cemetery landscape. The building's layout could also be simplified, allowing its bulk to be reduced. *(The applicant did try several subsequent design iterations with more glazing to appear more 'open' etc but none of them were considered to be successful by the Council or applicant.)*

- The panel encourages further work to refine the Gardeners' Building, aiming to reduce its size as far as possible, introduce more greening to help it integrate with the landscape, and progressing the architecture in a more robust direction. *(The applicant did revise the building at application stage to reduce the height of the building by 750mm, but due to continued opposition to the building in general, Project 6 has now been omitted from the application).*

Proposal

- 8.12 The current proposal, brought forward to oversee this more pro-active approach to maintenance and conservation, relates to both the Cemetery's buildings and landscape, and can be summarised as follows:
- 8.13 Buildings and Structures: Repair and conservation of historic buildings and construction of new buildings
- 8.14 Landscape: Forecourt public realm enhancement and conservation and management of the landscaping.
- 8.15 The masterplan has been broken down into a number of 'projects' or components, as below:
- Project 1: Community and Education Building
 - Project 2: Visitor, Operations and Volunteers Building
 - Project 3: Chapel Buildings
 - Project 4: Courtyard Store
 - Project 5: East Side Sentries
 - Project 7: Courtyard Public Realm
 - Project 8: Site-Wide Landscaping
 - Project 9: North Lodge and South Lodge
 - Project 10: Conservation of Funerary Structures and Mausolea
- 8.16 Each aspect of the proposal can be envisaged as a separate project, able to proceed independently, but collectively the proposals will enhance the overall significance and functionality of the Cemetery as a whole.
- 8.17 N.B. Project 6 is missing from this list as it has since been removed from the application.
- 8.18 It is noted that the applicant entered into a Pre-Planning Agreement with the Council for ongoing pre-application advice in 2023 and the design has

developed with input from the Council and Historic England and was reviewed by the independent Design Review Panel in July 2024.

Project 1: Community and Education Building

- 8.19 The site of the existing gardeners compound will be utilised for a new Community and Education Building, open to use by local groups and as a indoor area to accommodate school groups visiting the cemetery.
- 8.20 The existing gardener's compound makes a neutral contribution to the Registered Park and Garden and Conservation Area. It is considered to be modest and unassuming. For this reason, its loss is acceptable.
- 8.21 The design of the Community and Education Building has developed into a single-storey building with an additional subterranean storey, similar in nature to the existing building on the site, but with a tall pyramidal roof bringing in light from above. Although there is some variation in the surrounding ground level it would be approximately 7.7m tall, of which the roof is 4.2m.
- 8.22 The lower storey, built by extending the existing basement storey of the gardener's compound, would make a feature of the historic tunnel which once served to move coffins under Swains Lane between the west and east cemeteries. The design of the new building makes a feature of this historic tunnel, displaying the plaque and the mouth of the tunnel behind a glazed wall. This is considered a heritage benefit as it better reveals the significance of the site.
- 8.23 In terms of materiality, a layered aggregate concrete is proposed, to be distinct from the extensive use of stone around the cemetery, but also to retain some connection to the site and incorporate some of the demolition materials around the site (improving the sustainability credentials). The material would also be used for the Visitor, Operations Building in the west cemetery, and feature in the east sentries, thus tying the new buildings together. A physical sample of the aggregate concrete would be secured by condition and would be retained on-site throughout the works.
- 8.24 The pyramidal roof would be clad with grey slate, a roofing material found throughout the conservation area, appearing visually quiet above the brick boundary wall and between the trees when viewed from the public realm on Swains Lane, and from within the east cemetery itself. Although the tall roof is an architectural feature of the building its materiality and tapering form are considered to render it suitably subservient in this green landscape. Bee bricks and bat/bird boxes have been designed into the external envelope. Further details including samples of the external materials would be secured by condition.

Project 2: Visitor, Operations and Volunteers Building

- 8.25 The Visitor, Operations and Volunteers Building would be separated from the colonnade by a new ticket kiosk but otherwise would align with the listed colonnade and continue its sweeping form as it ascends the West Carriage Drive. The building would be set into the earth to reduce its prominence and steps up (appearing 1.5 storeys) as it continues away from the courtyard. The building would be constructed of layered aggregated concrete and would appear modern yet harmonious in the historic context, the tones of layered aggregate concrete complementing the use of Breedon Gravel and Yorkstone pavers proposed for the Courtyard.
- 8.26 The solidity of this building is achieved by expressing the depth of the column piers which will visibly support the series of gently vaulted ceiling slabs that span approximately 5m from wall to wall. In terms of detail, warm timber materials for windows, doors and furniture and certain internal partitions will be utilised to complement the warm tones of the facade. The bays feature integral seating and openable windows.
- 8.27 In terms of design revisions, the horizontal banding at the top of the building has been revised to align with the horizontal delineation of the colonnade, and the columns have been simplified so they do not compete with the colonnade visually, as per DRP advice at pre-application stage.

Project 3: Chapel Buildings

- 8.28 The listed Chapel building forms a grand entrance to the west cemetery as you arrive on Swains Lane. One walks through the gatehouse (an arched porter's lodge linking the chapels) between the two chapels to enter the courtyard. On the south side, the Anglican Chapel is used for religious purposes and meetings, and to the north, the Dissenters Chapel is used as offices. The chapel buildings are of Gothic design though laid out on a classical plan.
- 8.29 The application proposes internal and external renovation to the buildings. The works include the restoration of the tall pinnacles and cupola which once adorned the building's exterior. The improvement and restoration of the building is welcome and will enhance the asset. A condition would be secured if permission is granted to secure further details and samples where appropriate.
- 8.30 In the Dissenters Chapel, four rooflights are proposed to replace the existing five rooflights. The new ones will be less visible by virtue of their more discreet location and design (flush with the plane of the slate roof) and positioning no higher in the roof slope than the existing. Two rooflights would light the gallery and two would light the double height space. The rooflights will provide light and ventilation to the interior while being less visually intrusive than those existing.

- 8.31 The internal mezzanine would be replaced with a new smaller mezzanine level. This is considered an improvement on the existing situation and therefore acceptable.
- 8.32 A new door is proposed on the west façade of the Dissenters' Chapel directly to the courtyard beyond to allow step-free access. This results in harm to the Listed Building as a result of the loss of historic fabric and is assessed to be at the low end of less than substantial harm. This harm is outweighed by the public benefit of better access to a wider group of people, and improved facilities which ensures the buildings use for future generations. For this reason the alteration is considered acceptable.

Project 4: Courtyard Store

- 8.33 The Utility block will be used to store refuse and will have a separate area for the storage of mobility scooters. The building, located on the site of the existing WC block, is designed to be inconspicuous and sit set back from the Chapel Building. The structure will use bricks to match the boundary wall to the adjacent No. 81 John Winters' House, which, where possible will be reclaimed. Greening of the building's west elevation will reduce its appearance. In terms of detailed design, the entrance will have a robust timber door which will match the finish of the fenestration on the adjacent Cafe Building, and the stone coping will match the half-rounded profile used on the existing boundary wall. Further details on the facing materials and brick bonding would be required by condition.
- 8.34 The existing WC block is of a crude construction, appearing as more of a repurposed bunker. It is accepted that the structure detracts from the site and therefore its replacement with of a higher quality design and more appropriate to its heritage context is supported.
- 8.35 The re-use of a site near Swain's Lane, already occupied by a modest single-storey structure, significantly lessens the development's impact on the openness of the MOL.

Project 5: East Side Sentries

- 8.36 The existing ticket booth just inside the east cemetery will be removed and replaced with a new sentry, which will provide a sheltered enclosure for 2 volunteers on Swain's Lane and provide information to visitors and aid visitors orientation at the cemetery. A further smaller sentry is also being provided at the Chester Road gate.
- 8.37 The buildings have been designed in a soft oval form with a solid base, glazed top and overhang roof. The scale is appropriate and the oval form helps to break down the mass and not detract setting of the nearby tombs, graves and mausolea. Full materials and detailed design of individual

elements have been conditioned in order to ensure the appropriateness of final details and materials.

- 8.38 In order to create a more welcome and opening entrance it is also proposed to recess the gate posts of the existing bound wall to create an elliptical entrance.

Project 7: Courtyard Public Realm

- 8.39 The courtyard Colonnade is Grade II listed and comprises of an elliptical colonnade forming a courtyard between the grade II listed Chapels and entrance gateway. The Colonnade has considerable group value with the cemetery and adjacent listed buildings. The existing floor level of the Colonnade and courtyard dates from the 1980s which resulted in the base of the arches being obscured due to the level change. This intervention altered the proportions of the arches and space within the Colonnade. The proposal to restore the original floor level will enable a greater appreciation of the colonnade and wider courtyard. Within the Colonnade existing modern concrete pavers are to be removed and replaced with York stone and a self-binding gravel within the courtyard - a condition is included for materials samples of these.
- 8.40 The proposed public realm interventions involve removing the existing clutter including a portacabin, temporary ticket office and temporary metal gate at the base of the Colonnade steps. The proposals are appropriate interventions that result in an enhancement to the heritage assets.

Project 8: Site-Wide Landscaping

- 8.41 A holistic masterplan for the cemetery's landscaping has been outlined and will address many current issues the cemetery is facing, including, poor drainage, invasive/self-seeded species, poor accessibility, path erosion and flooding. These works can be divided into works of conservation and enhancement. The landscape proposals seek to reinstate a legible hierarchy to the existing pathway network and open spaces. The works of enhancement aim to facilitate improved access, increase the provision of amenity, as well as reinstate aspects of the original layout and planting, although a balance needs to be struck between the original historic design and the 'romantic decay' which has added a new layer of significance to the cemetery, the consequence of abandonment in the late 20th century.
- 8.42 The principle of this works is considered acceptable but further details would be secured by condition if granted. This includes details of the surfacing and drainage channels proposed for primary and secondary pathways.

Project 9: North Lodge and South Lodge

- 8.43 The proposed works to the North Lodge involve the restoration and conservation of the exterior, adaption to support new uses for volunteer

facilities and improvements to the building envelope. Much of this work involved renewing failed or visually intrusive 20th century repairs using appropriate conservation specific materials such as new lead capping's to the parapets are to be introduced to prevent water ingress and aid water runoff.

- 8.44 Additional insulation and renewal of the flat roof covering. Internal alterations include the removal of a concrete floor and replacement with a limecrete floor with a foamed glass substrate and the relocation of an internal partition. The proposed interventions are appropriate to the listed building and are considered acceptable.
- 8.45 The south lodge is currently used as the Sexton's office and volunteer mess space but will be refitted as toilets. This work involves the additional of full height toilet cubicles within the current rooms, replacement of the existing solid concrete floor with a limecrete floor, replastering and the addition of a water storage tank in the ceiling for rainwater harvesting.

Project 10: Conservation of Funerary Structures and Mausolea

- 8.46 Restoration works are proposed to many of the historic funerary structures and mausolea around the site. It is noted that due to the history of romantic decline or 'managed neglect' that the cemetery has undergone, rather than preserving as found, the level of deterioration means that a higher level of intervention is now necessary.
- 8.47 The following table outlines the key interventions to listed funerary structures and mausolea included within the proposal. The majority of the interventions represent repair and enhancement to the existing structures.

Heritage Asset	Proposal
Egyptian Avenue (Grade I)	Repairs, re-building and reinstatement of render to the obelisk. Repointing and repair to brickwork, repairs to render throughout including new weathering details.
Circle of Lebanon (Grade I)	Conservation and repair using original building materials. Interventions to limit water ingress and improve drainage. Reinstatement of the southern obelisk.
Terrace Catacombs (Grade II*)	Conservation and repair including restoration of terrace to original

	appearance and replacement of modern gates with replicas of originals. Enhanced drainage at the rear of the catacomb structures.
Beer Mausoleum (Grade II*)	Repairs to decorative stones which will involve them to be lifted and reset with new lead weathering details. Any open joints and cracks will be repaired.
Cuttings Catacombs (Grade II)	Repairs involving repointing open joints in the walls, repointing displaced joints and improvement to drainage channels at both sides.
Cory Wright mausoleum (Grade II)	Repairs involving repointing open joints in the walls, repointing displaced joints and improvement to drainage channels at both sides.
Cheylesmore mausoleum (Grade II)	Overhauling of the asphalt roof and perimeter flashing, repairs to the concrete plinth.
Hartley mausoleum (Grade II)	Removal of invasive vegetation, repositioning of loose stone to the plinth base, minor repointing to the plinth. Repairs to the door of the vault.
Jankovic mausoleum(Grade II)	Removal of vegetation and localised repointing, overhaul of the ironwork, repairs or render stepped
Rosa mausoleum (Grade II)	Removal of vegetation and repointing of open joints, pin and secure cracked masonry, new lead gutter to the parapet,
Otway mausoleum (Grade II)	Replacement of heavily corroded steel beams, clean and paint the remaining steel beams, repoint localised defects in masonry and repairs to the concrete masonry and render.

Guerrier mausoleum (Grade II)	Removal of vegetation and debris from roof, rake out and repointing joints and to the cornice. Overhauling of existing cast iron door.
Dalziel mausoleum (Grade II)	Repointing and stabilising of cracks, including the additional of Helibar reinforcement. Repointing in lime mortar.

- 8.48 A condition is recommended to ensure that specific details on the works proposed for each individual monument (including those not included above) will be submitted and approved by the Council.

Highgate Cemetery – Enhance

- 8.49 Highgate Cemetery, the application site itself is a Grade I Listed Registered Park and Garden of outstanding significance (as defined by the NPPF). It is one of the pioneering metropolitan cemeteries established in the early nineteenth century in London. It has historic value for its associations with the large number of notable historic figures interred within its grounds. It has cultural evidential value, in relation to the burial and commemorative practices of the mid-19th century, as well as the social range of burials from the landed and entrepreneurial elite to foundlings. The cemetery also has high artistic and architectural interest arising from its extraordinary funerary architecture and from its layout of paths, graves and planting which combine to create one of the most noted picturesque garden cemeteries.
- 8.50 The proposal has developed since 2023 with input from the Council and Historic England and on the whole is considered, overall, not to cause harm to the designated heritage assets: the site itself, the individual heritage assets within the site nor the nearby heritage assets. It is largely considered to either enhance or preserve the assets, apart from the conversion of the window in the Dissenters Chapel to a door, as referred to in sections 8.32 and 8.51. The table below identified the site's key heritage assets/monuments and the likely heritage impact.

Monument	Proposal (briefly)	Harm/Preserve/Enhance
West cemetery		
The Egyptian Avenue and Circle of Lebanon - Grade I listed structure	Conservation and repair using original building materials. Interventions to limit water ingress and improve drainage.	Enhance

	Reinstatement of the southern obelisk.	
The Terrace Catacombs - Grade II* listed structure	Conservation and repair including restoration of terrace to original appearance and replacement of modern gates with replicas of originals. Enhanced drainage at the rear of the catacomb structures.	Enhance
The Mausoleum of Julius Beer in Highgate (West) Cemetery - Grade II* listed structure	Conservation and works to prevent water ingress. Restoration works to reinstate damaged decoration.	Enhance
The Chapel building, including archway and railings - Grade II listed building	Reinstatement of original features and conservation of exterior. Replacement of 20th century interventions with more appropriate solutions. Dropping of cill of a window in the apse to create an accessible entrance doorway from the Courtyard. Enhancement to environmental performance.	Overall enhancement but one area of less than substantial harm regarding loss of historic fabric in the window to door conversion
Courtyard Colonnade - Grade II listed structure	Repair to fabric. Reduction of courtyard level to reveal original proportions. Renewal of floor finishes.	Enhance
North Lodge – Grade II listed building	Conservation and repair of exterior. Improvements to functionality and performance of the building. Enhancement to environmental performance.	Preserve
South Lodge - Grade II listed building	Conservation and repair of external envelope. Refurbishment including replacement	Preserve

	of previous interventions. Enhancement to environmental performance.	
Funerary monuments – Grade II listed structures (33 in number)	Conservation and repair work.	Preserve/Enhance
East cemetery		
Funerary monuments – Grade II listed structures (7 in number)	Conservation and repair work.	Preserve/Enhance

- 8.51 There is one point of less than substantial harm identified in the table above, this concerns loss of historic fabric in the conversion of a window to a new accessible door to the chapel. Considerable weight and importance is given to the harm caused, but it is noted it is at the lesser end of the spectrum. The new doorway would be formed by dropping the existing windowsill to the floor and installing a door within the width of the existing window frame. The door has been sympathetically detailed to replicate the appearance of the existing window with continuation of the glazing bars of the window above.
- 8.52 The proposed new buildings including the Community and Education building, Visitor and Operations Building and courtyard store have been sensitively designed and sit comfortably within this sensitive context. As such, they are considered to preserve the significance of Highgate Cemetery as whole.
- 8.53 The new buildings and landscaping have the potential to impact on the setting of individually listed funerary monuments and structures. However, the significance of these assets is largely derived from the group value within the cemetery which will continue to be appreciated. The interventions have been sensitively designed to preserve listed structures while appearing as distinctively modern. Moreover, the re-landscaping will enable improved access which will better reveal the significance of the heritage assets to a broader range of people.

Nearby Listed Buildings – Preserve

- 8.54 Although not within the application site, designated heritage assets: 81 Swain's Lane (Grade II* listed), Church of St Michael (Grade II* listed) and Waterlow Park (Grade II* registered park) are all within the vicinity of the new buildings.

- 8.55 81 Swains Lane, the John Winter House, is significant for being one of the best-known and most influential modern steel houses in England designed by the distinguished post-war architect, John Winter, noted for the pioneering use of Cor-Ten steel for domestic construction. It is also significant for its design which has considerable elegance and a close relationship with the landscape and monuments of Highgate Cemetery.
- 8.56 The Church of St Michael is significant for its architectural interest: a particularly large and ambitious church of the 1830s, incorporating work by three leading architects of the Gothic Revival, as well as artistic interest: the east wall and window form an unusually rich ensemble that combines high-quality decorative and artistic work of several periods. It is also significant for its group value as it is part of an important cluster of listed buildings at the junction of South Grove and Highgate West Hill and also as a focal point within the Grade I-registered Highgate Cemetery.
- 8.57 The area that is now Waterlow Park was formerly occupied by a number of private houses and grounds that dated from the C16 to C19, of note for their historic owners and occasional infamous occupants. The current 26-acre park, with spectacular views over the city, was assembled by Sir Sydney Waterlow who subsequently donated the gardens as a public park and 'a garden for the gardenless' in 1889. Lauderdale House, which remains within the Park, dates from the C16, as does the garden, which is of interest to garden historians, being a very early example in Britain of a terraced garden. The significance is due to both Lauderdale House, Victorian terraces/gardens and historic lodges which contribute to both its historic and architectural importance.
- 8.58 Due to the modest scale and design of the proposed buildings, and the nature of the work (to improve and enhance the heritage assets, landscaping, public realm etc) the works are not considered to detract from or harm the significance of the adjacent heritage assets. Although there will be change to the setting of these buildings, particularly in regard to the erection of three new structures (Projects 1, 2 and 4). The Council considers this to represent change rather than harm. For this reason, the application is considered to preserve the significance of the aforementioned nearby listed heritage assets.

Highgate Village Conservation Area – Enhancement

- 8.59 The application site lies within the Highgate Village Conservation Area. The essential character and significance of the Highgate Conservation Area is of a close-knit village crowning one of the twin hills to the north of London with the benefits of its open spaces and elevated position giving wide-reaching views towards London. The character of the Highgate CA is formed by the relationship of topography, open spaces, urban form and architectural details. Open, green spaces include Hampstead Heath, Highgate

Cemetery, Waterlow Park, South Grove reservoir, Fitzroy Park allotments and the many large gardens, all which contribute to the informal landscape setting and rural atmosphere which is an important part of its significance and character. Highgate Cemetery forms a large and important part of this Conservation Area.

- 8.60 The proposed masterplan includes new buildings and restoration and management of the landscape and heritage assets/monuments. The works are designed to preserve and enhance the cemetery which has been long neglected and nature and time have been allowed to take their course.
- 8.61 In terms of the new buildings, the tapered grey slate roof of the new Community and Education Building (Project 1) in the east cemetery would be seen above the cemetery's boundary wall on Swain's Lane. The roof is tall but tapers and would be clad in grey slate, sympathetic to the CA setting. The building has limited fenestration and therefore sits as a quiet, solid mass in the cemetery, echoing the form of a mausolea but built in a modern, warm-toned, layered, concrete aggregate. The new Visitor, Volunteer and Operations building (Project 2) within the west cemetery is unlikely to be seen from the public realm of the Highgate Village CA, however it is designed to align with the cemetery's listed colonnade and winds away from the courtyard sinking into the rising topography. It is also noted that the new buildings have larger volumes than the existing structures, these are replacement structures. Project 1 replaces an existing gardener's building against the cemetery boundary, and Project 2 replaces some shipping containers which currently detract from the cemetery and subsequently the CA (although not visible from the outside the cemetery itself).
- 8.62 Overall, the works are expected to enhance this area of the CA. Some change to the tree canopy is expected as well the erection of modest new buildings to serve the cemetery as both a place of burial and visitor attraction. Enhancements to the cemetery and many of its designated heritage assets are part of the application, as well as welcome public realm improvements between the facing west and east entrances of the cemetery on Swain's Lane.

Holly Lodge Estate Conservation Area – Preserve

- 8.63 The application site is adjacent to the Holly Lodge Estate Conservation Area. The Holly Lodge Estate is significant for being a distinctive planned development in the Garden Suburb tradition, dating to the interwar period (1920's) and located on the south facing slopes below Highgate Village. The buildings are designed in an English vernacular style influenced by the Arts and Crafts tradition. There is a homogeneity to the original design which lends a strong sense of place, within which there is a wealth and variety of details.

- 8.64 In terms of new buildings, the Visitor, Volunteer and Operations building (Project 2) at 1.5 storeys is likely to be visible above the trees from the rear of mansion blocks from properties at higher level on Holly Lodge Mansions. However, its living roof will soften its visual impact amongst the cemetery's vegetation and it would not be visible from the public realm. The new Community and Education Building (Project 1) is close to the corner of the CA's third sub-area on Swain's Lane and its tapered grey slate roof would be seen above the cemetery's boundary wall. The Council consider both buildings, and their roofs which will be most visible (living roof and slate roof respectively), to represent limited change to the setting the adjacent CA rather than harm.
- 8.65 The proposal will make some changes to the wooded landscape of the cemetery adjacent to the CA, however the recently approved ash-die-back management strategy application submitted separately to this planning application (but with shared aims) is likely to have a more significant impact on the tree canopy. There are only five trees proposed for felling in this application and they have been assessed as having limited visibility to the CA and surrounding CAs. The replacement trees proposed will enhance biodiversity and climate resilience through native and non-native planting and have been informed by historical planting records. This application will also address the flooding in the west cemetery which is adjacent to properties within the Holly Lodge Estate CA along its eastern boundary.

Dartmouth Park Conservation Area – Preserve

- 8.66 The application site is adjacent to the Dartmouth Park Conservation Area. The conservation area is significant for its a variety and complexity that charts the history of domestic architecture from the late 18th century to the present day. The CA has a semi-rural, leafy quality and has Parliament Hill Fields, the Greens, the backlands of Mansfield Bowling Club and Kenlyn Tennis Club, the nature reserve behind Mortimer Terrace and many garden and street trees which contribute to this, as well as fringing both Hampstead Heath and Highgate Cemetery. Although mainly residential there are other uses interspersed throughout the CA contributing to the strong sense of community cohesion.
- 8.67 The Dartmouth Park CA abuts the southern end of the east cemetery. There may be a change in tree canopy over time as the landscape is managed in terms of biodiversity and climate resilience, and the flooding at this end of the cemetery will be addressed through various measures outlined in section 14. No harm is identified and therefore the application is considered to preserve the character and appearance of the Dartmouth Park CA.

Design and Heritage Conclusion

- 8.68 Overall, the designs put forward are considered appropriate and sensitive to their context in light of the design and heritage policy designations. The

application seeks a holistic masterplan approach to this important site and includes clear heritage benefits, including the management, restoration of the Grade I listed cemetery but also ensuring increased access and education opportunities. The proposed repair methodologies are appropriate and have the opportunity to enhance the heritage assets. One area of less than substantial harm has been identified to the chapel building because of the loss of historic fabric. Para 214 of the NPPF (2024) requires that any harm should be weighed against the public benefits of the proposal- in this instance enabling level access will allow the continued function of the historic building and enable an increased number of visitors to appreciate the heritage asset. Overall, the scheme as a whole delivers net heritage benefits both in terms of physical improvements to individual listed buildings/structures but also to Highgate Cemetery.

- 8.69 Conditions have been applied to ensure that a key heritage benefits such as the restoration of monuments and buildings, and landscaping interventions are achieved prior to the occupation of certain new buildings. In order to ensure that all the heritage benefits of the scheme are delivered in a timely manner, a phasing plan and heritage delivery plan are to be secured by S106 agreement.

9. IMPACT ON NEIGHBOURING AMENITY

- 9.0 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.
- 9.1 There are three new structures being proposed: Community and Education Building (Project 1), Visitor and Operations Building (Project 2) and the Courtyard Store (Project 4).

Outlook, Privacy, Loss of light: Community and Education Building (Project 1)

- 9.2 The Community and Education Building will sit just behind the boundary wall on Swains Lane in the east cemetery, on the site of the existing gardener's compound. The building will remain single storey with a basement, as is the existing structure, but it will be slightly larger and would have a tall pyramidal roof. The proposed building would have a greater mass than the existing gardener's compound but it is not considered in its context (and in light of the topography) to have any material negative impact on the nearby John Winters House or neighbouring No 79, both on the other side of the road, in terms of outlook and loss of light.

- 9.3 There would not be any new windows with a direct or clear view toward the nearest residential property, No 81 Swains Lane (John Winter House), 79 Swains Lane or the Holly Lodge Mansions. There would be some glazing at ground floor to the south elevation, but this is not considered likely to result in any direct or harmful views into nearby habitable rooms due to the angles and cemetery boundary in between. An openable skylight would also top the pyramidal roof bringing light and fresh air into the interior, this faces directly upwards and is considered to provide light and air rather than to form a view or outlook toward any habitable rooms and therefore is not considered to result in any harm in terms of loss of privacy.

Outlook, Privacy, Loss of light: Visitor and Operations Building (Project 2)

- 9.4 The Visitor and Operations Building is a new building to be erected in the west cemetery and will stretch from the southern end of the colonnade and wind up West Carriage Drive where at the moment shipping containers lie providing storage. The building will be taller than the existing shipping containers and will ascend from 1 to 1.5 storeys as it ascends the path away from the courtyard. It will lie approximately 15.5m west of the rear of No.79 Swains Lane and 20m from the rear of No.81. There is existing substantial foliage on the southern side of this main arterial route (between the proposed building and the residential properties), and therefore the presence of a 1 - 1.5 storey building is not considered to present a significant difference in terms of physical massing to the west which may block daylight to these two properties or be detrimental in terms of outlook.
- 9.5 In terms of overlooking and privacy, in addition to potential vegetation screening, the windows at higher level will be at an oblique angle to the windows on the rear facades of the closest residential properties and therefore no material loss of privacy is considered likely. Where the properties may be more exposed closer to the courtyard (in terms of vegetation), the building is only one storey and therefore direct views are blocked by the existing boundary wall.

Outlook, Privacy, Loss of light: Courtyard Store (Project 4)

- 9.6 The Courtyard Store would replace the existing WC block behind the chapel, close to the boundary with No 81 (John Winters House). It is a single storey building replacing a single storey building. The proposed building, much like the existing building, has very limited fenestration and would sit as a quiet, solid addition against the site boundary. The new store would be bigger than the existing structure, increasing from 9.6sqm to 16.8sqm GIA, however it is still considered a fairly modest, subordinate structure in context of the courtyard and surroundings. The limited fenestration and single storey nature of the building against the site boundary means that the design proposed does not raise any outlook, overlooking or privacy concerns.

Outlook, Privacy, Loss of light: Wider Masterplan

- 9.7 Apart from the erection of buildings aforementioned, the nature of the works (chiefly landscaping and restoration of existing heritage assets) means that amenity harm is unlikely.

Noise

- 9.8 In the context of expected increased numbers of visitors in the future, and in light of the nature of Projects 1 and 2 (Community & Education Building and the Visitor, Volunteer and Operations building), the proposal is likely to attract more activity on site and therefore more may result in more noise.
- 9.9 In terms of the café, people will be able to sit outside in the courtyard as is the case currently with the chairs and tables near the coffee van. There is no proposed increase in the number of external tables, rather the proposal will introduce the option of sitting inside. In this manner activity and noise in the courtyard may decrease, however this would be dependent on visitor numbers and the season/weather. In the general context of expected increased numbers of visitors in the future, more activity and noise in the courtyard and cemetery generally is likely. However, activity in the courtyard is not proposed at unsocial hours and is not considered to be materially harmful to the surrounding residential properties above and beyond the existing situation which includes tour groups and school groups. It is noted that there is no history of complaints from nearby residents in relation to the courtyard seating which will remain as it is (or may be used less in favour of the internal seating option).
- 9.10 As part of the public benefits of the scheme, the Community & Education building (Project 1) will be open to local community groups in the evenings. The evening opening hours will be secured in a Community Use Plan in a Section 106 legal agreement accompanying planning permission if granted. These groups and bookings will be managed by the cemetery and are not expected to cause undue disturbance in the evenings to local residents.
- 9.11 In terms of proposed plant, an acoustic assessment has been provided to support the planning application which would include three external air source heat pumps, one internal heat pump and one internal air handling unit. Two heat pumps are proposed to serve the new Visitor and Operations Building (Project 2) in the west cemetery, and one heat pump and one air handling unit are proposed to serve the new Community and Education Building (Project 1) in the east cemetery. The air handling unit to Project 1 would be internal, located at basement level and ducted to the atmosphere above the building's eastern vestibule.
- 9.12 The closest noise-sensitive receptors are identified as the John Winter House (No81 Swains Lane,) which is approximately 20m away from the closest plant unit, and the Holly Lodge Mansions, on the corner of Swain's

Lane and Oakeshott Avenue, approximately 40m away from the closest plant unit. Despite being farther away than the properties on Swains Lane, Holly Lodge Mansions does not benefit from shielding effects from physical barriers and has direct line of sight to the plant units outside the Education and Community Building.

- 9.13 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, Camden Council's Local Plan, version June 2017 and BS 4142:2014 "Methods for rating and assessing industrial and commercial sound".
- 9.14 The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the buildings. The assessment indicates that the proposed installation should be capable of achieving the Camden's environmental noise criteria at the nearest and potentially most affected noise sensitive receptors.
- 9.15 The Council is satisfied that the submitted acoustic submission and associated technical details meets the local plan guidelines with specified mitigation and therefore is acceptable in environmental health terms. Conditions will be added to the permission if approved to ensure compliance with the relevant standards for noise and vibration.

Amenity Conclusion

- 9.16 Overall, the proposal is not considered to present any material harm in terms of neighbour amenity to the surrounding residences and therefore is considered in alignment with Local Plan policies A1 and A4.

10. SUSTAINABILITY AND ENERGY

- 10.0 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.
- 10.1 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Redevelopment strategy

- 10.2 Based on our Camden Local Plan policy, we require submission of a Whole Life Carbon (WLC) assessment for any applications involving substantial

demolition, and this is typically required for all scales of development from a single dwelling to major/referrable developments.

- 10.3 In this case, Whole Life Carbon has been considered due to the substantial demolition of some of the existing buildings, however due to the small scale of the development, a simplified WLC assessment has been accepted. This has been accepted on the basis that the applicant clearly demonstrates resource efficiency in their proposal, including: the carbon impact of the types of materials chosen for the development, design choices which reduce the carbon impact and how materials are used/reused or recycled on or offsite from the demolition to reduce carbon impact, and evidence on how the proposal will (where feasible) reduce the A1-A5 for project 2 (which previously exceeded the benchmark). The applicant is considered to have done this.
- 10.4 The buildings proposed for demolition are the existing gardeners building on the east side of the cemetery (to be replaced with the community/education building), and the toilet block on the west side of the cemetery (to be replaced with the storage block).
- 10.5 The existing gardeners building is single-storey with a basement. The existing structure is of limited use in that it is in poor condition with outdated mechanical and electrical systems, limited access and limited thermal retention. It does not meet current building and accessibility requirements, and would not be flexible enough to serve the community or educational use. In its current state it would have a limited lifespan and refurbishment would have to be extensive.
- 10.6 The WC block sits on the southern side of the courtyard to the West Cemetery and is of a crude, concrete construction, appearing as more of a repurposed bunker. It is accepted that the structure detracts from the site and therefore its replacement is supported. The toilet block reviewed in terms of the possibility of reusing the structure for the building of a 'new' one using it as a skeleton, but the footprint and solid brick/block construction mean the ability for reuse is limited. Please note that although the proposed "Project 4: Courtyard Store – Utility Block" is intended to replace the existing "Chapels' WC Block" (to be demolished), it has not been assessed in the WLCA. This exclusion is considered acceptable, as the original building has a small footprint of 9.2 m² and the proposed replacement is 25.9 m², both of which are considered to be smaller than a 1-bed-1-storey dwelling (minimum GLA design standard).
- 10.7 It is accepted that for these two buildings retrofit, or refurb and extend options, are undeliverable/not appropriate on the site. It is noted that a basement already exists below the gardeners building and this footprint will be utilised and extended for the new building on this site.

- 10.8 As demolition is considered to be justified, Whole Life Carbon (WLC) information has been submitted for the gardeners building (site for Project 1) to show that any replacement building has considered the carbon impact of the construction and use of the building over its lifetime.
- 10.9 Circular Economy and Whole Life Carbon (WLC) principles have been applied, and are summarised in the following approach:
- Conserve resources and source ethically
 - Design to eliminate waste
 - Manage waste sustainability and at the highest value.

- 10.10 Examples of how these principles have been applied to different components of the masterplan can be seen in below:

Education and Community Building:

- 10.11 Designed for flexible use to support long-term adaptability. Commitment to low-carbon material procurement. A Stage 4 pre-demolition audit will be undertaken to identify existing materials suitable for reclamation and reuse. Exploring opportunities to source stone locally to reduce transport emissions.

Visitor Operations Building:

- 10.12 Incorporates flexible spaces and modular design. Forward-thinking approach to service networks, with infrastructure designed to accommodate future retrofits (e.g. heat pump integration with minimal excavation). Exploring use of precast concrete and low-carbon concrete alternatives. Material reuse strategy includes crushed demolition waste integrated into layered aggregate concrete for new construction.

Small New Structures (e.g. Project 4: Utility Block, Project 5: Sentries, Project 9: South Lodge WCs):

- 10.13 Opportunity for innovative circular design due to its scale. Potential use of timber structures and demountable designs, acknowledging shorter lifespans of smaller buildings. Use of prefabricated elements to enhance construction efficiency. Creative reuse of materials encouraged throughout.

Heritage Buildings (e.g. Chapel, North and South Lodges):

- 10.14 Focus on retaining and reusing existing structures. Internal adaptations to improve space utilisation. Future planning to ensure buildings meet modern occupancy and safety standards while preserving heritage value.
- 10.15 The development plan promotes circular economy principles and local plan policy CC1 and London Plan policy SI7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building and to optimise resource efficiency.

- 10.16 In this case, the existing gardener's building is to be demolished as the neither refit, refurbishment or substantial refurbishment and extension options will provide flexible spaces that would sufficiently serve the uses proposed. Instead, the approach is to demolish the building and reclaim and recycle as much as possible. A pre-demolition audit will identify the materials within the building and document how they will be managed, reused, remanufactured or recycled. The WLC benchmarks will be met.
- 10.17 To ensure greater resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use.

Whole Life Carbon

- 10.18 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building's life.
- 10.19 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).
- 10.20 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are "regulated emissions" and so are considered separately and in detail in relation to the zero-carbon target (see the "Energy and carbon reductions" section below).
- 10.21 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).
- 10.22 Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again at the end of its life (when it decomposes), so it is included in the total A-C-Modules.
- 10.23 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square meter of gross internal area in kilograms of carbon equivalent ($\text{kgCO}_2\text{e/m}^2$ GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The tables below show how the development performs against the benchmarks, as well as the aspirational targets.

PROJECT 1 East Side Building Community & Education

10.24 Using WLC summary for school/university. In this case, the development meets the benchmarks as shown in Table 1 below.

10.25 Specific considerations on reducing WLC for **Project 1** include:

- Durable and flexible design, reuse material from demolition and excavation, where possible reduce impact of concrete, stage 4 will undertake a pre-demolition audit.
- Timber roof structure, framed walls, and solid timber frame windows will be incorporated

Modules	Min benchmark for SCHOOL / UNIVERSITY (kgCO ₂ e/m ² GIA)	Aspirational Benchmark for SCHOOL / UNIVERSITY (kgCO ₂ e/m ² GIA)	Proposal (kgCO ₂ e/m ² GIA)
A1-A5	<750	<500	750 (aspirational 589)
B-C (excl B6 & B7)	<250	<175	225
Total A-C (excl B6&B7 but inc sequestration)	<1000	<675	911 (with aspirational to 752)

Table 1 - Summary of Whole-Life Carbon results for the school/university development

PROJECT 2 Visitor, Volunteer and Operations West Side Building

10.26 The Council and applicant have agreed that the WLC summary for office is the most appropriate benchmark for Project 2 and therefore this has been used. In this case, there is a shortfall in development meeting the benchmarks as shown in Table 2 below. The upfront carbon for the baseline scenario is estimated to be 945kg CO₂e/m² just over the office GLA Benchmark of 950 kg CO₂e/m². The Aspirational scenario is projected to achieve >20% reduction and bring the Upfront to an estimated 742 kg CO₂e/m².

10.27 Specific considerations on reducing WLC for Project 2 include:

- Raft foundations being considered to reduce quantum of excavation needed, precast concrete being considered and testing structural load to make it as efficient as possible. Also looking into low carbon concrete and material reuse as well as using demolition waste within the layered aggregate concrete.

- Modular design with adapted internal partitions for easy internal reconfiguration as operational needs change – flexibility for future need.

Modules	Min benchmark for OFFICE (kgCO ₂ e/m ² GIA)	Aspirational Benchmark for OFFICE (kgCO ₂ e/m ² GIA)	Proposal (kgCO ₂ e/m ² GIA)
A1-A5	<950	<600	954 (742 aspirational)
B-C (excl B6 & B7)	<450	<370	260
Total A-C (ex B6&B7 inc sequestration)	<1400	<970	1163 (952 aspirational)

Table 2 - Summary of Whole-Life Carbon results for the office development

Energy and carbon reductions

- 10.28 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2). The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

Energy and carbon summary

- 10.29 The following summary tables shows how the two new buildings (Projects 1 and 2) perform against the policy targets for operational carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	31%
Be green stage (renewables): CLP policy CC1	20%	35%
Total carbon reduction: LP policy SI2 and LP CC1	35%	35%

Table 1 – Project 1 – Community & Education Building - Carbon saving targets and the scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	30%

Be green stage (renewables): CLP policy CC1	20%	39%
Total carbon reduction: LP policy SI2 and LP CC1	35%	39%

Table 2 – Project 2 – Visitor & Operations Building - Carbon saving targets and the scheme results

- 10.30 The operational carbon savings and measures set out below will be secured under an Energy and Sustainability Strategy secured by Section 106 legal agreement which includes monitoring, in compliance with the development plan.

Total carbon reductions

- 10.31 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021).
- 10.32 In this case, there is no offset required because this is not a major development, however despite this the applicant has demonstrated that the two buildings would met/exceed the policy target of 35% reductions, achieving an overall on-site reduction of 35% (Project 1) and 39% (Project 2) below Part L requirements as shown in Tables 1 and 2 above.

Be lean stage (reduce energy demand)

- 10.33 The development reduces emissions at Be Lean by 30% which is no increase from the baseline and complies with policy as it is a minor development.
- 10.34 The proposals involve high performance insulation, low air permeability, and efficient glazing. The proposal includes energy efficient measures like MVHR, WasteWater Heat Recovery, high efficiency lighting and high efficiency heating equipment, pumps and fans.

Be clean stage (decentralised energy supply)

- 10.35 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- 10.36 This requirement only applies to major applications, but despite this it has been reviewed by the applicant. In this case an assessment of the existing London heat map has been made and demonstrated that there are no existing local networks present within connectable range of the scheme.

Be green stage (renewables)

- 10.37 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 10.38 In this case, the development significantly exceeds the policy target of 20%, reducing emissions by 35% (Project 1: Community and Education Building) and 39% (Project 2: Visitor & Operations Building) at this stage through renewables, in compliance with the development plan. The proposal includes low carbon heating Air Source Heat Pumps (ASHPs) which are proposed for both the Community & Education Building (Project 1) and the Visitor & Operations Building (Project 2).

Be seen (energy monitoring)

- 10.39 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting. The proposal has proposed the incorporation of a Building Energy Management system for both Projects 1 (Building Community & Education) and 2 (Visitor, Volunteer and Operations Building). This would enable monitoring, collating and submission of total energy use, for the first 5 years after occupation.

Climate change adaption and sustainable design

- 10.40 Local Plan policy CC2 expects development to be resilient to climate change. As well as the design of new buildings, much of the application seeks to manage and enhance the landscape of the cemetery in order to achieve climate resilience.
- 10.41 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. The development incorporates a new drainage system, sustainable drainage systems (SUDS) and water efficiency measures.
- 10.42 The new buildings are designed with the cooling hierarchy in mind in line with Policy CC2. Project 1 (Community and Education Building) will benefit from high performing building fabric and solar control glazing, which will optimise natural daylight while limiting summer solar gain. As well as the aforementioned, Project 2 (Visitor & Operations Building) will include external vertical fins and brise-soleil to minimise gains on the southeast façade to the café and a living roof which will also work to stabilise the internal climate of the building. Details of the roof will be secured by condition.

- 10.43 The ASHPs are reversible with the ability to circulate chilled water through the underfloor heating, however a condition, in line with Local Plan policy CC2, has been added to the application for the disabling of the active cooling function as the new buildings proposed do not show a high likelihood of overheating. It is also noted that the buildings are likely to benefit from shading from surrounding trees in the hot summer months which is not accounted for in the overheating calculations and will reduce the need for cooling.

11. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 11.0 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation. This approach is supported by LP policy G5 which uses Urban Greening Factor (UGF) targets to evaluate the quality and quantity of urban greening. The policy applies a target of 0.4 for mainly residential schemes, and 0.3 for mainly commercial schemes.
- 11.1 The cemetery is a SINC and has great ecological value which this application will seek to preserve and enhance.
- 11.2 Although separate to this application, within the same vein, a tree application for a 10 year Highgate Cemetery ash dieback management plan has been submitted and approved (ref 2024/2878/T). Ash dieback is a fungal disease that causes dieback and/or death of ash trees. There are many thousands of self-set ash trees at Highgate Cemetery, a vast number of which are infected with ash dieback. Highgate Cemetery have been submitting individual s.211 notices to prune or remove infected trees over recent years, however the dieback has spread rapidly and extensively, heightened by the drought of 2021 which further stressed trees increasing susceptibility resulting in infection rates rising. The severity of the ash dieback at Highgate Cemetery has got to the stage where the management have no choice but to take action to ensure the safety of staff and visitors. The council supports long term, holistic arboricultural management and the 10 year management plan approved is considered to be well-informed, robust and comprehensive.
- 11.3 In terms of this application, the tree survey and arboricultural survey includes cat. A (high quality) and cat. B (moderate quality) trees. Due to the vast number of cat. C (low quality) trees these were not included in the survey and are not a significant constraint on development in accordance with BS5837:2012.

- 11.4 The scheme involves the removal of five cat. B trees (moderate quality) all of which are of low visibility from the public realm and are not considered to significantly contribute to the character and appearance of the conservation area. These are to be removed to allow for architectural repairs and bank stabilisation works, and to restore lost views of St Paul's Cathedral and St Michael's Church from The Terrace.
- 11.5 The impact of the scheme on the trees to be retained will be of an acceptable level. The tree protection measures are considered to demonstrate that the trees to be retained will be adequately protected throughout development.
- 11.6 The replacement tree planting scheme has been informed by historical planting records, enhancing biodiversity and climate resilience through native and non-native planting. This is appropriate as the site is not historically a natural woodland but an ornamental landscape that has evolved in to wooded areas through lack of management. The broad, site-wide character of the existing planting is of a more exotic, intentional nature at the northern end of the west side, which slowly evolves to a more naturalistic, nature-led character in the southern end of the east side. First edition Ordnance Survey maps have been used to inform the reinstatement of large canopy trees along drive and primary paths. The soft landscaping plans seek to build on this existing character. 300+ replacement trees are proposed, of 24 species new to the site and 16 native species. The Council welcomes this proposed shift back toward an intentional, managed landscape. Full details will be secured by condition.
- 11.7 Native hedgerows, diverse ground cover, species rich lawns and SuDS swales are also proposed. The living roof proposed on the café building will have a varying substrate depth which is welcomed. Full details of the living roof are to be secured by condition.

Bats (drafted)

- 11.8 The OBRIA is fairly detailed, and assesses the Potential Roost Feature (PRF) for each building. It also covers potential impacts arising from works that are not part of the planning application (such as any future internal repair works that are identified); that would also be subject to the bat legislation. For a number of structures, there are no external PRFs that may be affected by repair works.
- 11.9 The remaining issues are impacts on confirmed roosts, and 'potential' impacts. In order to determine an application where there is an impact on bats that may require a Licence to be undertaken lawfully, the Council need to assess the likelihood of a Licence being granted.
- 11.10 The report sets out the potential impacts, and these range from loss of day roosts used by individual, common bat species up to maternity and hibernation roosts used by less common species. The greatest potential

impact being on a Barbastelle maternity roost, but the Council agree with the assessment, which is that this one is highly unlikely to be present. The potential avoidance/mitigation ranges from *not doing something*, i.e. not installing grids on vents, to installing bat boxes (externally or internally), to construction of new structures to replace larger roosts.

- 11.11 The mitigation for the more likely impacts are quite achievable, and the greater impacts (on maternity and hibernation roosts) are unlikely or could probably be avoided through careful working and maintaining access, as is proposed with the existing hibernation roosts. If these impacts could not be avoided, such that more extensive mitigation was required (as identified), the Council do not believe there is anything in the current applications that would prevent this, even if it required a planning consent in the future.
- 11.12 Therefore, having considered the impacts and potential impacts, the actual and potential avoidance and mitigation proposed, it is considered that a Licence is likely to be granted for the works. A Bat Mitigation Plan (BMP) will be required by condition and will need to include: a method statement for works to buildings with confirmed bat roosts, a timetable and method for updating the potential roost features survey and a timetable and method for updating the activity surveys, and roost and emergence surveys informed by the updated PRF survey.
- 11.13 Where additional identified impacts cannot be avoided, a Licence must be obtained from Natural England before any Licensable works commence.
- 11.14 The design of the Education and Community building already incorporates them but other bat and bird boxes will be secured on-site by condition.

Other Environmental/Ecological Impacts

- 11.15 The proposed Construction Ecological Management Plan (CEMP) as set out in the EclA contains a number of specific measures to address identified potential impacts, including the rare orb-weaving spider and mosses/liverworts (features mentioned in the SINC citation).
- 11.16 It is likely the impacts on the spiders will only be from the actual works themselves, as after the works have finished the suitable habitats for spiders will still be suitable (there is no heating or lighting being installed, and the structures will not be sealed).
- 11.17 A CEMP secured via condition is considered sufficient to protect the site and its species from any negative environmental or ecological impacts.

Conclusion

- 11.18 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan.

Statutory Biodiversity Net Gain

- 11.19 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG) as part of the Environment Act 2021.
- 11.20 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.
- 11.21 This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits.
- 11.22 Based on the information provided, this scheme will require the approval of a BGP before development begins.
- 11.23 The majority of the site comprised tightly packed graves, with some areas of ornamental planting including trees. Furthermore, strips of wildflowers have been seeded along the main paths. Numerous self-seeded trees, mainly ash and sycamore, have established between the graves to create stands of mixed semi-mature broad-leaved trees. Areas of coarse grassland and scrub have also established between the graves. Because these habitats are highly modified and do not represent recognised species assemblages, they have not been broken down in the assessment.
- 11.24 Improvements of woodland and grassland, removal of invasive species and maintenance of the spring area on the west side will result in BNG score of +10.7%.
- 11.25 No irreplaceable habitats are present on the site. All the baseline habitats were classified as area habitats, and no linear habitats were present. The habitats overlapped where trees, graves and scrub or grassland occurred in the same location.
- 11.26 Council's Nature Conservation Officer considers that the biodiversity gain condition is capable of being discharged successfully. The 10% gain can be met on-site. This would be confirmed via discharge of the statutory BNG condition. A condition is being added to the decision notice, and informatives explaining the statutory obligations will be included on the decision.

12. TRANSPORT

Overview

- 12.0 The main entrance to Highgate Cemetery is located on Swain's Lane in the northeast of the Borough. The cemetery has a Public Transport Accessibility Level (PTAL) rating of 2 which means it is not easily accessible by public transport. The nearest train station is Archway (London Underground) circa 1.4km to the southeast of the entrance to the cemetery provides access to Northern Line services. Bus services can be accessed on Chester Road and Swain's Lane (C11), Highgate Road (143, 210, and 271), and Highgate West Hill (274). An E-Scooter & Cycle Hire parking bay is located circa 200m south of the entrance to the cemetery on Swain's Lane, just south of Oakeshott Avenue. This provides access to e-scooters and e-bikes for hire. However, this bay is already showing signs of overcapacity and increasing demand.
- 12.1 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows a rating of 3 in the area, which indicates opportunities for improvement. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.

Car Parking

- 12.2 The Highgate Cemetery currently has 8 off-street parking spaces. The proposals would reduce this level of provision to 6 off-street parking spaces, 2 of which would be disabled parking spaces. The car parking proposals are acceptable in accordance with Policy T2. The development would also be secured as car free development (except for disabled parking spaces and any operational parking) in line with Policy T2 which seeks to limit the availability of parking and require all new developments in the borough to be car-free.

Cycle Parking

- 12.3 The proposals include 10 short-stay cycle parking spaces for visitors within the forecourt area.
- 12.4 It is noted that Project 6 (the mound/Gardeners' building) has now been omitted from the application but was to provide 12 long-stay cycle parking spaces for staff within the building. The gardener's facilities are still necessary and will be addressed after further consultation and study, and will likely constitute a future planning application.

- 12.5 Given this amendment, the cycle parking proposals, which represent a marked improvement on the existing (currently no spaces provided on-site), are considered acceptable.

Pick-up and Drop-off

- 12.6 The Highgate Cemetery currently has a forecourt adjacent to Swain's Lane. As per the existing situation, drop offs will take place within the forecourt, with vehicles including coaches and taxis arriving from the south along Swain's Lane and departing northbound on Swain's Lane. Pick-ups will be organised in the same manner, with vehicles arriving from the south and departing northbound.
- 12.7 Parking within the forecourt will be managed by on-site staff to allow coaches to stop. Coaches will be actively managed and subject to a maximum duration of 15-minutes for any drop-offs and pick-ups. Coaches will be parked to ensure that the east-west pedestrian route between the cemeteries remains unobstructed.

Delivery and Servicing Management

- 12.8 The servicing strategy for the site will remain as per the existing situation with servicing vehicles making use of the forecourt for loading and unloading activities. Deliveries for the site are expected to comprise staff supplies, gardening equipment and café goods, with delivery of bulky items expected to be infrequent. Vehicles will typically not exceed a 7.5t box van and will utilise the forecourt in-line with existing arrangements. Most deliveries will be scheduled outside of the site's visitor opening hours and therefore will not conflict with visitor vehicles or peak pedestrian times.

Construction Management

- 12.9 Construction management plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft Construction Management Plan using the Council's CMP pro-forma was submitted with the planning application.
- 12.10 Highgate Cemetery is located on Swain's Lane. Traffic congestion is a significant problem on some roads in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The phased construction works are also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

- 12.11 Any temporary changes to the public highway to facilitate construction of the development proposals would need to be funded by the developer or their appointed contractor.
- 12.12 It is noted that a highways Approval In Principle (AIP) for £1,906.87 (Cat 2) will be required to ensure basement works of Project 1 (Community and Education building) alongside the existing historic tunnel do not cause harm to the adjacent public realm on Swains Lane. This would be secured by the s106 legal agreement.
- 12.13 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction.
- 12.14 A more detailed CMP, an implementation support contribution of £4,194, and a construction impact bond of £8,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

Public Realm Improvements

- 12.15 The proposals include the provision of new surfacing within the forecourt and along Swain's Lane where it meets the cemetery's eastern and western accesses. This will improve accessibility through a raised pedestrian walkway between the accesses, step-free access to both cemeteries, and improving the forecourt adjacent to the Chapel building.
- 12.16 The public realm improvements proposal are welcomed and would help to improve the character and appearance of Swain's Lane in the vicinity of the entrance to the cemetery. Officers particularly support any measures to widen the footway on the east side of Swain's Lane and the concept of introducing an informal pedestrian crossing between the east and west sides of the cemetery.
- 12.17 The Council will secure a public realm improvements contribution of £150,000 via a S106 legal agreement if planning permission is granted. This will relate to the public realm improvements on the public highway adjacent to the site. The Council will implement these public realm improvements via a S278 legal agreement.

Micro and shared mobility improvements

- 12.18 Dedicated parking bays for dockless rental e-bikes and rental e-scooters are located near the Highgate Cemetery on Swain's Lane, Raydon Street, and South Grove. However, these bays merely provide capacity for existing usage by residents and people who work in or visit the area and are already showing signs of overcapacity and increasing demand.

- 12.19 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the very low STAL rating and the demand arising for this transport mode from the proposal, it is appropriate that additional capacity is provided in the future via developer contributions.
- 12.20 An E-Scooter and Cycle Hire improvements contribution of £5,000 would therefore be secured as a Section 106 planning obligation if planning permission is granted. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g. by expanding existing bays and providing additional bays). Officers anticipate staff and visitors to the Highgate Cemetery using these modes of transport as an alternative to public transport, especially when their primary mode of transport is bus or rail with a secondary trip by micromobility vehicles.

Overall

- 12.21 The proposals are acceptable in terms of transport implications subject to the following conditions and planning obligations being secured by legal agreement:
- Condition to secure the provision and ongoing retention of 10 short-stay cycle parking spaces for visitors.
 - Construction management plan (CMP), and CMP implementation support contribution of £4,194, and CMP Impact Bond of £8,000.
 - Public Realm Improvements contribution of £150,000.
 - Micro and shared mobility improvements contribution of £5,000.
 - AIP and £1,906.87 (Cat 2)

13. BASEMENT

Statutory Framework

- 13.0 Policy A5 (Basements) states that the Council will only permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms. It also requires that a Basement Impact Assessment (BIA) has to be submitted and independently audited.

Basement proposal

- 13.1 The proposal includes the extension of the existing single-storey basement under the existing gardeners building in the east side of the cemetery near the boundary with Swain's Lane. The existing basement is 31sqm, and the enlarged basement would be 95sqm, just larger than the new ground floor above at 78sqm. The basement would provide a flexible gathering space framing a view of the adjacent historic tunnel, WCs, furniture storage space and a plant store for the MVHR unit.

- 13.2 Although the floorplan is not square, the basement would measure 10.2sqm from east to west, and 10sqm from north to south. Its widest measurement, taken diagonally across the space (from lift to furniture storage) would be 13.5sqm. The floor to ceiling height at basement level would be approximately 2.63m.
- 13.3 The basement would be supported by piles and foundations will be below the zone of influence of any tree root and no trees will be felled as part of the proposed development such that no impact to neighbouring foundations is expected.

Basement technicalities

- 13.4 In order to demonstrate compliance with the requirements of policy A5, CPG Basements, a Basement Impact Assessment (BIA) has been submitted and assessed by third party auditors Campbell Reith (CR). As part of the initial audit, the auditors have questioned the impact of the basement on the land stability, hydrology of the area, the presence/absence of adjacent or nearby basements, ground movement assessment and mitigation measures, structural stability of the host building and neighbouring ones, drainage and run-off, and the damage scale.
- 13.5 Although not all are applicable, as the policy is worded to be applicable to residential properties within a garden, the basement proposed is compliant with the overall aims of Local Plan Policy A5. It meets most of the technical criteria in terms of its location, scale and size (as set out below in section 13.7). The basement would comprise a single storey (with an area of deeper excavation for a swimming pool, as allowed by policy), it would not be built underneath an existing basement, and it would be less than 1.5 times the footprint of the host property. However, the basement would not comply with part L, as it would be excavated up to the boundary with Swain's Lane. The basement is being excavated to the boundary as part of the building's design, to make a feature of the historic tunnel under Swain's Lane. This is considered acceptable. This is considered acceptable subject to the Highways AIP S106 described in paragraph 12.13 above.
- 13.6 Policy A5 stresses that the siting, location, scale and design of basements must have minimal impact on and be subordinate to the host building, by meeting the following limitations:
- (f) Not comprise more than one storey; **complies** - *single storey basement*
 - (g) Not be built under an existing basement; **complies** – *extension of an existing basement*.
 - (h) Not exceed 50% of each garden within the property; **N/A**
 - (i) Be less than 1.5 times the footprint of the host building in area; **complies**. *The footprint area of the building at ground floor would be 95sqm, while the footprint of the proposed basement would be 125sqm.*

- (j) Extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation; **complies**.
- (k) Not extend into or underneath the garden further than 50% of the depth of the garden; **N/A**.
- (l) Be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; **does not comply**. *The basement is being excavated up to the boundary.*
- (m) Avoid loss of garden space or trees of townscape or amenity value; **complies**.

- 13.7 The BIA indicates the cemetery boundary wall may undergo damages up to Category 2. This would be classified as aesthetic damage only, with no structural implications, and it does not affect a residential structure. This is considered acceptable by the Council and a condition would be attached for the monitoring of the wall throughout works and suitable repair works as required. A condition would be attached to the permission to ensure strict compliance with the BIA and the independent BIA audit. There would also be a condition requiring the appointment of a qualified chartered engineer with membership of the appropriate professional body to inspect, check for compliance with the design (as approved by the local planning authority and building control body) and monitor the critical elements of the basement works.

14. FLOOD RISK AND DRAINAGE

- 14.0 Policy CC3 of the Local Plan seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible and seeks to achieve greenfield run-off rates where possible.
- 14.1 The application site is divided in the middle by Swain's Lane which is a previously flooded street (1975). The application site is prone to flooding and the masterplan includes a new drainage system and SUDS to improve this situation.
- 14.2 Currently, the site's surface water drainage is managed through an underground piped system that collects runoff from the main paths, buildings, and surrounding landscape. This water is typically conveyed to the Thames Water sewage network or an unidentified underground stream.
- 14.3 The proposal will increase the area of impermeable surface on the site, due to the necessary new buildings and paving, however care has been taken to ensure the development will be drained well to mitigate any increase in flood risk across the site or elsewhere. A Drainage Strategy has been submitted with the application to show there is no increase in peak run off rate of stormwater leaving the site, volume of run off leaving the site, pollution to receiving waters from storm water runoff and flood risk to nearby areas or neighbouring sites.

- 14.4 The masterplan proposes a rainwater harvesting system (with an active attenuation underground tank on the east side to capture and store surface water for subsequent irrigation - attenuation volume of 53m³) and a soakaway system (total attenuation storage and retention volume of 117m³).
- 14.5 Rainwater harvesting systems are proposed for buildings and nearby paths to collect water from roofs and terraces for irrigation and WC flushing. These systems will be installed at Catacombs Terrace, the Chapel, the new Education and Community Building, and the Chester Road gate on the east side. By capturing and storing rainwater, these systems will conserve water, reduce reliance on municipal supplies, and mitigate the impacts of droughts.
- 14.6 At the Chester Road gate, an active attenuation system is proposed. The tank will be for both rainwater harvesting and long-term stormwater storage. A control system linked to weather forecasts will manage water levels and release rates, optimising water use during non-storm periods and effectively managing stormwater runoff. The rainwater harvesting process involves collecting rainwater from designated surfaces and storing it in a tank. Once the tank reaches capacity, the system gradually releases water at a controlled rate to drainage system. Filtration and overflow protection measures will be incorporated to ensure water quality and prevent flooding.
- 14.7 On the west side of the cemetery, soakaways are proposed at several secondary paths on the west side, including where there is ponding in the south-west corner. Infiltration systems are suitable on the west side of the cemetery due to its satisfactory infiltration ability. This subsurface drainage system designed will allow rainwater to gradually infiltrate the surrounding soil.
- 14.8 On the east side of the cemetery, where infiltration ability is lower, pumped soakaway systems are proposed, particularly where there is ponding in lower areas towards the south of the site. This will minimise the risk of ponding recurrence in these areas.
- 14.9 Where soakaway systems are infeasible due to tree protection zones, shallow gravel subbase and French drain would be installed on both sides of the cemetery. These linear trenches consist of a perforated pipe wrapped in filter fabric and surrounded by coarse gravel aggregate. The perforated pipe efficiently collects surface water runoff, while the filter fabric prevents soil particles from clogging the system. The surrounding gravel acts as a reservoir, facilitating temporary storage of collected water and reducing the strain on traditional drainage systems. This environmentally friendly approach effectively manages surface water runoff while minimising environmental impact.

- 14.10 In terms of the piped drainage system, a system of drainage channels would be installed along all primary paths, in addition to retention (wherever possible) of the existing underground piped drainage network.
- 14.11 In terms of the basement extension that is part of Project 1 (Community and Education Building) and the tunnel cutting at the Anglican Chapel, the Council have conditioned further information on flood mitigation and flood resilience measures (for example installation of non-return valves, raised thresholds at ingress points, resilience measures of plant equipment etc.)

15. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 15.0 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. The final CIL liability will be confirmed by the CIL team. The site lies in Zone C where CIL is calculated using rates based on the relevant proposed uses.
- 15.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of £17,460.64.
- 15.2 The proposal will also be liable for the Camden Community Infrastructure Levy (CCIL). The site lies in Zone C where CIL is calculated using rates based on the relevant proposed uses. The estimated Camden CIL liability is £6,900.61.
- 15.3 Please note that these are estimated figures and the final figures will be subject to correct indexation, the provision of appropriate evidence or supporting information, and confirmation of in-use floorspace.
- 15.4 The proposal may be able to benefit from a charitable relief exemption for both the Mayor of London's Community Infrastructure Levy (MCIL2) and the Camden Community Infrastructure Levy (CIL). The applicant will need to apply for this and provide the relevant information.

16. CONCLUSION

- 16.0 The scheme proposes much improvement and represents overall heritage and ecological enhancement of the site but is also considered to cause harm in relation to the MOL designation which prevents inappropriate development unless there are very special circumstances that clearly outweigh the harm to the MOL and any other harm arising from the development, for example the less than substantial harm identified to the chapel with the loss of historic fabric and conversion of a window to a door to achieve step free access. The very special circumstances in this instance relate to the cemetery's dual nature as both a working cemetery and a world renowned visitor attraction, and the need for change to ensure its

sustainable long-term future in line with the MOL objectives – it's very particular characteristics (its physical layout and landscaping, its historical importance and significance as a visitor attraction) combined with the need to address the current circumstances of those characteristics (to secure the restoration and repair of the structures, improvements to the landscape, and to properly provide for the ability to maintain the cemetery and to cater for visitors) to secure a sustainable long-term future as a working cemetery and world renowned visitor attraction and ensure the strategic protection of a special site in the public interest for continued use and enjoyment.

16.1 Overall, the works proposed represent heritage enhancement and the harm caused to the openness of MOL is considered outweighed by the public benefits the scheme would offer as outlined below:

- Heritage benefits - securing the repair, restoration and preservation of the Cemetery, its monuments and buildings and other artefacts and their setting for the public benefit;
- Public and economic benefits -ensuring the cemetery can sustainably continue to function as a public burial ground and visitor attraction;
- Public benefits - community and education space provision;
- Climate/sustainability benefits - resilience for the landscape;
- Public benefits - public realm, accessibility and transport improvements.

16.2 The masterplan will deliver significant improvements to the site including those which protect and enhance its heritage (net heritage benefit) and ecological significance. The current deterioration of the cemetery (and therefore risk to its long-term significance) justifies significant intervention to ensure its sustainability. The level of harm identified in relation to Metropolitan Open Land is considered justified by very special circumstances and considerations which outweigh the harm caused by the development and therefore the application is supported.

17.RECOMMENDATION

17.0 Grant conditional Planning Permission and Listed Building Consent subject to a Section 106 Legal Agreement with the following heads of terms:

- Construction management plan (CMP) and CMP implementation support contribution of £4,194
- CMP Impact Bond of £8,000
- Car free and reduced onsite parking (except for disabled parking spaces and any operational parking)
- Micro and shared mobility improvements contribution of £5,000
- Community Use Plan
- Phasing Plan and delivery of Heritage Benefits
- Energy & Sustainability Plan

- Highways AIP of £1,906.87
- Public Realm Improvements contribution of £150,000

18.LEGAL COMMENTS

18.0 Members are referred to the note from the Legal Division at the start of the Agenda.

19. PLANNING PERMISSION CONDITIONS

Standard conditions

1 Time limit

The development hereby permitted must be begun not later than five years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2 Approved drawings

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Existing Drawings: Location Plan HIG-GPB-ZZ-ZZ-L-DR-0001 rev R2, Highgate Cemetery Memorial Plan C0701001-P-02 rev B, Chapel Elevation 1 Existing 1066-3-1-01-P1, Chapel Elevation 2 As Existing 1066-3-1-02-P1, Chapel Elevation 3 As Existing 1066-3-1-03-P1, Chapel Elevation 4 As Existing 1066-3-1-04-P1, Lodges Site Plan 1066-9-3-00-P1, South Lodge Plans Elevations Existing 1066-9-3b-10-P1, South Lodge Plans Roof Plan Proposed 1066-9-3B-20-P2, South Lodge Elevation 1 1066-9-3B-21-P2, South Lodge Elevation 2 1066-9-3B-22-P2, South Lodge Elevation 3 1066-9-3B-23-P2, Chapel Site Plan 1066-3-1-00-P1, SECTION AA EXISTING THROUGH DISSENTERS CHAPEL 1066-3-1-10-P1, SECTION FF EXISTING 1066-3-11-P1, SECTION GG EXISTING 1066-3-1-12-P1, SECTION HH EXISTING 1066-3-1-13-P1, CHAPEL ROOF PLAN AS EXISTING 1066-3-1-14-P1, CHAPEL ROOF PLAN PROPOSED RESTORATION AND CONSERVATION 1066-3-1-20-P2, CHAPEL ELEVATION 1 PROPOSED CONSERVATION AND RESTORATION 1066-3-1-21-P2, CHAPEL ELEVATION 2 PROPOSED CONSERVATION AND RESTORATION 1066-3-1-22-P1, CHAPEL ELEVATION 3 PROPOSED CONSERVATION AND RESTORATION 1066-3-1-23-P2, CHAPEL ELEVATION 4 PROPOSED CONSERVATION AND RESTORATION 1066-3-1-24-P1, SECTION AA PROPOSED DOME DETAIL 1066-3-1-25-P2, SECTION AA PROPOSED THROUGH PARAPET 1066-3-1-26-P2, SECTION BB EXISTING AND PROPOSED 1066-3-1-29-P1, SECTION CC EXISTING AND PROPOSED 1066-3-1-30-P2, SECTION DD CUPOLA STRUCTURE 1066-3-1-31-P2, SECTION EE CUPOLA STRUCTURE 1066-3-1-32-P1, CUPOLA STRUCTURE PLANS 1066-3-1-33-P1, DOME 2 PINNACLE 2 AND 3 PLANS AND ELEVATIONS 1066-3-1-34-P2, PINNACLE 4 PLANS AND ELEVATIONS 1066-3-1-35-P2, PINNACLE 5 PLANS AND ELEVATIONS 1066-3-1-36-P2, SECTION FF PROPOSED 1066-3-1-37-P2, SECTION GG PROPOSED 1066-3-1-38-P2, SECTION HH PROPOSED 1066-3-1-39-P2, Otway Mausoleum Existing 1066-10-15-10-P2, Rosa Mausoleum Existing 1066-10-14-10-P2, Kelman Mausoleum Existing 1066-10-13-10-P2, Jankovich Mausoleum Existing 1066-10-12-10-P2, Morgan Mausoleum Existing 1066-10-11-10-P2, Mausolea Site Plan 1066-10-9-00-P2, Hartley Mausoleum Existing 1066-10-10-10-P2, Cheylesmore Mausoleum Existing 1066-10-9c-10-P2, Dalziel Mausoleum Existing 1066-10-19-10-P2, Foster Mausoleum Existing 1066-10-18-10-P2, Guerrier Mausoleum Existing 1066-10-17-10-P2, Da Silva Mausoleum Existing 1066-10-16-10-P2, Beer Mausoleum Existing 1066-10-9b-10-P2, Cory Wright Mausoleum Existing 1066-10-9a-10-P2, Terrace Catacombs Site Plan 1066-10-8-00-P2, Terrace Catacombs Floor Plan Existing 1066-10-8-10.1-P2, Terrace Catacombs Floor Plan Existing 1066-10-8-10.2-P2, Terrace Catacombs Floor Plan Existing 1066-10-8-10.3-P2, Terrace Catacombs Reflected Ceiling Plan Existing 1066-10-8-11.1-P2, Terrace

Catacombs Reflected Ceiling Plan Existing 1066-10-8-11.2-P2, Terrace
 Catacombs Reflected Ceiling Plan Existing 1066-10-8-11.3-P2, Terrace
 Catacombs Roof Plan Existing 1066-10-8-12.1-P3, Terrace Catacombs Roof Plan
 Existing 1066-10-8-12.2-P2, Terrace Catacombs Roof Plan Existing 1066-10-8-
 12.3-P3, Terrace Catacombs Elevations / Sections Existing 1 1066-10-8-13.1-P2,
 Terrace Catacombs Elevations / Sections Existing 2 1066-10-8-13.2-P2, Terrace
 Catacombs Elevations / Sections Existing 3 1066-10-8-13.3-P2, Circle of Lebanon
 Site Plan 1066-10-7-00-P2, Circle of Lebanon GF Plan Existing 1066-10-7-10-P2,
 Circle of Lebanon Inner Circle RF Plan Existing and parapet details 1066-10-7-11-
 P2, Circle of Lebanon Outer Circle RF Plan Existing and Parapet Details 1066-10-
 7-12-P2, Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.1-P2,
 Circle of Lebanon Inner Ring Elevations Existing 1066-10-7-13.2-P2, Circle of
 Lebanon Inner Ring Elevations Existing 1066-10-7-13.3-P2, Circle of Lebanon
 Inner Ring Elevations Existing 1066-10-7-13.4-P2, Circle of Lebanon Inner Ring
 Elevations Existing 1066-10-7-13.5-P2, Circle of Lebanon Inner Ring Elevations
 Existing 1066-10-7-13.6-P2, Circle of Lebanon Inner Ring Elevations Existing
 1066-10-7-13.7-P2, Circle of Lebanon Outer Ring Elevations Exst 1066-10-7-14.1-
 P2, Circle of Lebanon Outer Ring Elevations Exst 1066-10-7-14.2-P2, Circle of
 Lebanon Outer Ring Elevations Exst 1066-10-7-14.3-P2, Circle of Lebanon Outer
 Ring Elevations Exst 1066-10-7-14.4-P2, Circle of Lebanon Outer Ring Elevations
 Exst 1066-10-7-14.5-P2, Egyptian Avenue Site Plan 1066-10-6-00-P2, Egyptian
 Avenue GF Plan Existing 1066-10-6-10-P2, Egyptian Avenue Elevation 1 Existing
 1 1066-10-6-11.1-P2, Egyptian Avenue Elevation 1 Existing 2 1066-10-6-11.2-P2,
 Egyptian Avenue Elevation 1 Existing 3 1066-10-6-11.3-P2, Egyptian Avenue
 Elevation 2 Existing 1 1066-10-6-12.1-P2, Egyptian Avenue Elevation 2 Existing 2
 1066-10-6-12.2-P2, Egyptian Avenue Elevation 2 Existing 3 1066-10-6-12.3-P2,
 Egyptian Avenue Elevation 3 Existing Upper Portal 1066-10-6-13-P2, Egyptian
 Avenue Elevation 4 Existing Lower Portal 1066-10-6-14-P2, Cuttings Catacombs
 Site Plan 1066-10-5-00-P2, Cuttings Catacombs Existing Ground Floor Plan 1066-
 10-5-10-P2, Cuttings Catacombs Existing Roof Plan 1066-10-5-11-P2, Cuttings
 Catacombs Existing Elevations 1066-10-5-12-P2, Colonnade Site Plan 1066-10-4-
 00-P2, Colonnade Floor Plan Existing 1066-10-4-10-P2, Colonnade Ceiling Plan
 Existing 1066-10-4-11-P2, Colonnade Elevations Existing 1066-10-4-12-P2,
 Colonnade Roof Plan Existing 1066-10-4-13-P1, Lodges Site Plan 1066-9-3a-00-
 P2, North Lodge Plans and Elevations Existing 1066-9-3a-10-P2.

Proposed Drawings: Building drawings: Project 1 - Community & Education
 Building Existing East Lodge - Demolition Drawings HGC-HAL-CB-ZZ-DR-A-1000-
 S3-P02, Project 1 - Community & Education Building Floor Plans HGC-HAL-CB-
 ZZ-DR-A-1010-S3-P02, Project 1 - Community & Education Building Sections
 HGC-HAL-CB-ZZ-DR-A-1011-S3-P02, Project 1 - Community & Education
 Building Elevations HGC-HAL-CB-ZZ-DR-A-1012-S3-P02, Project 1 - Community
 & Education Building Enlarged Section and Elevation HGC-HAL-CB-ZZ-DR-A-
 1013-S3-P02, Project 3 - Dissenters' Chapel – Plans Demolition Plans - Ground &
 First HGC-HAL-DC-ZZ-DR-A-1000-S3-P02, Project 3 - Dissenters' Chapel – Plans
 Proposed Plans - Ground & First HGC-HAL-DC-ZZ-DR-A-1010-S3-P02, Project 3
 - Dissenters' Chapel – Sections Proposed Sections HGC-HAL-DC-ZZ-DR-A-1011-
 S3-P02, Project 3 - Dissenters' Chapel – EA Enlarged Arrangement – Details
 HGC-HAL-DC-ZZ-DR-A-1012-S3-P02, Project 3 - Dissenters' Chapel – Details
 Main Entrance Door - Chapel Apse HGC-HAL-DC-ZZ-DR-A-1013-S3-P02, Project
 3 - Dissenters' Chapel – Details Enlarged Sections - Interface Details HGC-HAL-
 DC-ZZ-DR-A-1014-S3-P02, Project 5 – East Cemetery – Sentry 1 – Plan,
 Elevation & Section HGC-HAL-ES-ZZ-DR-A-1010-S3-P02, Project 5.2 - East
 Sentry - Chester Road Entrance Proposed Plan, Elevation & Section HGC-HAL-
 ES-ZZ-DR-A-1011-S3-P02, Project 9.2 - South Lodge Existing Plans & Sections

HGC-HAL-SL-ZZ-DR-A-1000-S3-P02, Project 9.2 - South Lodge Proposed Plans, Elevation & Sections HGC-HAL-SL-ZZ-DR-A-1010-S3-P02, Project 4 - Existing WC Block Demolition Drawings HGC-HAL-UB-ZZ-DR-A-1000-S3-P02, Project 4 - Proposed Utility Block Plans, Sections, Elevations HGC-HAL-UB-ZZ-DR-A-1010-S3-P02, Project 2 - Visitor and Operations Copy 1 Demolition Plan + Proposed Roof Plan HGC-HAL-VB-ZZ-DR-A-1000-S3-P02, Project 2 - Visitor and Operations Building Highgate Cemetery Ground & First Level Plan-1010-S3-P02, Project 2 -Visitor & Operations Building -Sections-1011-S3-P02, Project 2 - Visitor & Operations – Elevations East & North – Elevation HGC-HAL-VB-ZZ-DR-A-1012-S3-P02, Project 2 - Visitor & Operations – Elevations West & South – Elevation HGC-HAL-VB-ZZ-DR-A-1013-S3-P02, Proposed Site Plan HGC-HAL-XX-XX-DR-A-1000-S3-P02

Conservation drawings: Otway Mausoleum Proposed 1066-10-15-20-P2, Otway Mausoleum Proposed 1066-10-15-21-P2, Rosa Mausoleum Proposed 1066-10-14-20-P2, Kelman Mausoleum Proposed 1066-10-13-20-P2, Jankovich Mausoleum Proposed 1066-10-12-20-P2, Morgan Mausoleum Proposed 1066-10-11-20-P2, West Scott Architects Project 10 Mausolea Doors & Fittings 1066-10-12/16/10-30 P2, Hartley Mausoleum Proposed 1066-10-10-20-P2, Cheylesmore Mausoleum Proposed 1066-10-9c-20-P2, Pocklington Mausoleum Existing and Proposed 1066-10-21-20-P2, Strathcona Mausoleum Existing and Proposed 1066-10-20-20-P2, Dalziel Mausoleum Proposed 1066-10-19-20-P2, Dalziel Mausoleum Proposed 1066-10-19-21-P2, Foster Mausoleum Proposed 1066-10-18-20-P2, Guerrier Mausoleum Proposed 1066-10-17-20-P2, Da Silva Mausoleum Proposed 1066-10-16-20-P2, Beer Mausoleum Proposed 1066-10-9b-20-P2, Beer Mausoleum Roof Proposed 1066-10-9b-21-P2, Cory Wright Mausoleum Proposed 1066-10-9a-20-P2, Terrace Catacombs Floor Plan Proposed 1066-10-8-20.1-P2, Terrace Catacombs Floor Plan Proposed 1066-10-8-20.2-P2, Terrace Catacombs Floor Plan Proposed 1066-10-8-20.3-P2, Terrace Catacombs Reflected Ceiling Plan Prop 1066-10-8-21.1-P2, Terrace Catacombs Reflected Ceiling Plan Prop 1066-10-8-21.2-P2, Terrace Catacombs Reflected Ceiling Plan Prop 1066-10-8-21.3-P2, Terrace Catacombs Roof Plan Proposed 1066-10-8-22.1-P3, Terrace Catacombs Roof Plan Proposed 1066-10-8-22.2-P3, Terrace Catacombs Roof Plan Proposed 1066-10-8-22.3-P3, Terrace Catacombs Elevations / Sections Proposed 1 1066-10-8-23.1-P3, Terrace Catacombs Elevations / Sections Proposed 2 1066-10-8-23.2-P2, Terrace Catacombs Elevations / Sections Proposed 3 1066-10-8-23.3-P2, West Scott Architects Project 10 Terrace Catacombs Existing Roof Terrace 1066-10-8-31 P2, West Scott Architects Project 10 Terrace Catacombs Roof Terrace Section 1066-10-8-32 P2, West Scott Architects Project 10 Terrace Catacombs West Steps 1066-10-8-33 P2, West Scott Architects Project 10 Terrace Catacombs East Steps 1066-10-8-34 P2, Circle of Lebanon Inner Circle RF Plan Proposed and parapet details 1066-10-7-21-P3, Circle of Lebanon Outer Circle RF Plan Proposed and Parapet Details 1066-10-7-22-P3, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.1-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.2-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.3-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.4-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.5-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.6-P2, Circle of Lebanon Inner Ring Elevations Proposed 1066-10-7-23.7-P2, Circle of Lebanon Outer Ring Elevations Prop 1066-10-7-24.1-P2, Circle of Lebanon Outer Ring Elevations Prop 1066-10-7-24.2-P2, Circle of Lebanon Outer Ring Elevations Prop 1066-10-7-24.3-P2, Egyptian Avenue Elevation 1 Proposed 1 1066-10-6-21.1-P2, Egyptian Avenue Elevation 1 Proposed 2 1066-10-6-21.2-P2, Egyptian Avenue Elevation 1 Proposed 3 1066-10-6-21.3-P2, Egyptian Avenue Elevation 2 Proposed 1 1066-

10-6-22.1-P2, Egyptian Avenue Elevation 2 Proposed 2 1066-10-6-22.2-P2, Egyptian Avenue Elevation 2 Proposed 3 1066-10-6-22.3-P2, Egyptian Avenue Elevation 3 Proposed 1066-10-6-23-P3, Egyptian Avenue Elevation 4 Proposed 1066-10-6-24-P2, Cuttings Catacombs Proposed Ground Floor Plan 1066-10-5-20-P2, Cuttings Catacombs Proposed Roof Plan 1066-10-5-21-P2, Cuttings Catacombs Proposed Elevations 1066-10-5-22-P2, Colonnade Floor Plan Proposed 1066-10-4-20-P2, Colonnade Ceiling Plan Proposed 1066-10-4-21-P2, Colonnade Elevations Proposed 1066-10-4-22-P2, Colonnade Roof Plan Proposed 1066-10-4-23-P1, North Lodge GF Plan Proposed 1066-9-3a-21-P2, North Lodge Roof Plan Proposed 1066-9-3a-22-P3, North Lodge Proposed Elevations 1 and 2 1066-9-3a-23-P3, North Lodge Proposed Elevations 3 and 4 1066-9-3a-24-P2.

Landscape drawings: GA Plan – Masterplan HIG-GPB-ZZ-ZZ-L-DR-1000 rev R4, GA Plan – East HIG-GPB-ZZ-ZZ-L-DR-1002 rev R4, Hardscape & Furniture Plan – East HIG-GPB-ZZ-ZZ-L-DR-1101 rev R4, Softscape Plan Understory – East HIG-GPB-ZZ-ZZ-L-DR-1201 rev R4, Softscape Plan Understory – West HIG-GPB-ZZ-ZZ-L-DR-1200 rev R3, Softscape Plan Trees – East HIG-GPB-ZZ-ZZ-L-DR-1301 rev R4, Softscape Plan Trees – West HIG-GPB-ZZ-ZZ-L-DR-1300 rev R3, Typical Hardscape Details - Drainage - 1 of 3 HIG-GPB-ZZ-ZZ-L-DR-4100 Rev R2, Typical Hardscape Details - Drainage - 2 of 3 HIG-GPB-ZZ-ZZ-L-DR-4101 Rev R2, Typical Hardscape Details - Drainage - 3 of 3 HIG-GPB-ZZ-ZZ-L-DR-4102 Rev R2, Typical Hardscape Details - Paving and Kerbs HIG-GPB-ZZ-ZZ-L-DR-4103 Rev R2, Typical Hardscape Details Weirs HIG-GPB-ZZ-ZZ-L-DR-4104 Rev R2, Typical Tree Pit Details 1 of 6 HIG-GPB-ZZ-ZZ-L-DR-4500 Rev R2, Typical Tree Pit Details 2 of 6 HIG-GPB-ZZ-ZZ-L-DR-4501 Rev R2, Typical Tree Pit Details 3 of 6 HIG-GPB-ZZ-ZZ-L-DR-4502 Rev R2, Typical Tree Pit Details 4 of 6 HIG-GPB-ZZ-ZZ-L-DR-4503 Rev R2, Typical Tree Pit Details 5 of 6 HIG-GPB-ZZ-ZZ-L-DR-4504 Rev R2, Typical Tree Pit Details 6 of 6 HIG-GPB-ZZ-ZZ-L-DR-4505 Rev R2, Typical Softscape Details 1 of 2 HIG-GPB-ZZ-ZZ-L-DR-4506 Rev R2, Typical Softscape Details 2 of 2 HIG-GPB-ZZ-ZZ-L-DR-4507 Rev R2, Terrace Steps Section HIG-GPB-ZZ-ZZ-L-DR-2000, Courtyard and Swain's Lane HIG-GPB-ZZ-ZZ-L-DR-2001, Café Interface and Access Control HIG-GPB-ZZ-ZZ-L-DR-2002, Cuttings Embankment Section HIG-GPB-ZZ-ZZ-L-DR-2003, Ballustrade and Steps to Cory-Wright Mausoleum HIG-GPB-ZZ-ZZ-L-DR-2004, Elevated Boardwalk to Terrace Section HIG-GPB-ZZ-ZZ-L-DR-2005.

Documents:

Phasing plan, Covering letter dated 1 September 2025 by Montagu Evans ref PD13571/LM/JH/OF, New Gardeners' Facilities: A Collaborative Approach by Friends of Highgate Cemetery Trust, Highgate Cemetery Landscape Masterplan: Design and Access Statement Volume 2: Introduction & Vision Rev 1 dated August 2025, Highgate Cemetery Landscape Masterplan: Design and Access Statement Volume 2: Landscape Design and Access Statement Rev 1 dated August 2025, Highgate Cemetery: Design & Access Statement: Volume 3: Architecture & Conservation doc ref: HGC-HAL-XX-XX-RP-A-1000 Rev P03 dated August 2025, Part 2: BS: 5837 Arboricultural Impact Assessment Report & 'Draft' Tree Protection Plan - West dated 4th October 2024 by Bartlett Consulting, Part 2: BS: 5837 Arboricultural Impact Assessment Report & 'Draft' Tree Protection Plan – East Rev 1 dated 20th August 2025 by Bartlett Consulting, Part 3: BS: 5837 Arboricultural Method Statement Report & 'Final' Tree Protection Plan Rev 1 dated 20th August 2025 by Bartlett Consulting, Archaeological desk-based assessment dated August 2025 by Mola, Building Impact Assessment ref 3500-A2S-XX-XX-RP-Y-0002-00 dated October 2024 by A-squared Studio, Basement Impact

Assessment Audit Project No. 14291-45 date October 2025 rev D1 by Campbell Reith, Biodiversity Net Gain Report 2025 by Ashgrove Ecology, The Statutory Biodiversity Metric updated 29/08/2025, Building Damage Ground Movement Assessment ref 3 500-A2S-XX-XX-RP-Y-0001-01 Rev 01 dated November 2024 by A-squared Studio, Draft Construction Management Plan dated August 2025 by Caneparo Associates, Ecological Impact Assessment version 4 dated August 2025 by Ashgrove Ecology, 1538 – Highgate Cemetery ref1538-SAC-xx-xx-RP-Energy Statement Rev 6.0 dated 21/08/2025 by Skelly & Couch, Flood Risk Assessment P03 dated 20 August 2025 by Max Fordham, Heritage Statement dated August 2025 by Montagu Evans, Highgate Cemetery Landscape Masterplan Maintenance & Management Plan dated August 2025 by Gustafson Porter + Bowman, Noise Impact Assessment 22082025 dated 22/08/2025 by Gillieron Scott Acoustic Design, Planning Statement version 2 dated 2 September 2025, Statement of Community Involvement Addendum dated 1 September 2025, Statement of Need version 2 dated 1 September 2025, Structural Statement J4565 Highgate Cemetery ref J4565-S-RP-0002 Rev 02, Sustainability Statement for Planning dated September 2025, Transport Statement dated August 2025 by Caneparo Associates, Whole Life Carbon Project 1: Community & Education Building ref HGC-HAL-XX-XX-RP-A-1001 dated August 2025, GLA WholeLifeCarbonAssessment Template-P1 Baseline, Sustainable Drainage Strategy Report P04 dated 20 August 2025 by Max Fordham, Pro-forma for any scheme in flood risk areas & all major development – Camden LLFA, West & East Cemetery Site Wide Landscape Drainage Layout j7048-MXF-XX-XX-DR-P-11000 rev P06 by Max Fordham, Outline Bat Roost Impact Assessment Rev 3.0 by MKA Ecology, Ecological Impact Assessment Version 3 dated December 2024 by Ashgrove Ecology, Highgate Cemetery Conservation Philosophy Prepared for the Friends of Highgate Cemetery Trust November 2024 by Alan Baxter, Structural Appraisal Report ref 240323/S Wilkinson Version 1 dated 22 May 2024 by Consibee, Planting Schedule GPB-HIG-SCH-0001 Rev P01 dated 18/07/2024 by Gustafson Porter + Bowman, LANDSCAPE SOIL MANAGEMENT STRATEGY REPORT TOHA/24/8209/MH Rev 02 by Tim O'Hare Associates LLP, Highgate Cemetery Landscape Masterplan Maintenance & Management Plan dated November 2024 by Gustafson Porter + Bowman, Socio-economic Assessment by Useful Projects dated 21 August 2024, HIGHGATE CEMETERY: THE FUNERARY STRUCTURES, MAUSOLEA AND SUNDRY LISTED BUILDINGS RIBA STAGE 3 SCHEDULE OF WORKS by West Scott Architects Issue Preliminary 5: October 2024.

Reason: For the avoidance of doubt and in the interest of proper planning.

Pre-start conditions (any works)

3 Tree Protection

Prior to the commencement of any works on site, details demonstrating how trees to be retained shall be protected during construction work shall be submitted to and approved by the local planning authority in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details. Details shall also include a full, auditable schedule of arboricultural monitoring to be undertaken by the project arboriculturalist.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the London Borough of Camden Local Plan 2017.

4 Construction Ecological Management Plan

No development shall commence until a Construction Ecological Management Plan (CEMP), in line with the recommendations of the EcIA hereby approved, is submitted to and approved in writing by the local planning authority.

Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan and Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.

5 Land Contamination Risk Assessment

Part A:

No development shall commence until a preliminary risk assessment report is submitted to and approved in writing by the local planning authority. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses. A conceptual site model should be produced indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks to identified receptors. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Subsequent parts are subject to the findings of the desk study:

Part B:

No development shall commence until a site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority.

The site investigation should assess all potential risks identified by the desktop study and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Part C:

No development shall commence until a remediation method statement (RMS) is submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Part D:

Following the completion of any remediation, a verification report demonstrating that the remediation as outlined in the RMS have been completed should be submitted

to, and approved in writing, by the local planning authority. This report shall include (but may not be limited to): details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil and waste management documentation. All works must be carried out in compliance with LCRM (2020) and by a competent person.

Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.

6 Habitat Management and Monitoring Plan

The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan has been submitted to, and approved in writing by, the local planning authority and including:

- a) a non-technical summary;
- b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.

Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of G6 the London Plan and Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.

7 Bat Mitigation Plan

Prior to the commencement of work on any building or built structure as part of this development, a Bat Mitigation Plan (BMP) shall be submitted to and approved in writing by the Council. The BMP is to include:

- a method statement for works to buildings with confirmed bat roosts (Chapel Buildings and Terrace Catacombs), including an exclusion to working on these buildings between October to March (unless works have been included elsewhere in the BMP and a Protected Species Licence obtained);
- a timetable and method for updating the potential roost features survey; and
- a timetable and method for updating the activity surveys, and roost and emergence surveys informed by the updated PRF survey.

The works shall be carried out in accordance with the details thus approved.

Where additional identified impacts cannot be avoided, a Licence must be obtained from Natural England before any Licensable works commence.

Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act"), G6 of the London Plan and Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.

8 Expert supervision

Prior to commencement of development, details of the person who will supervise the hereby approved works of alteration or demolition shall be submitted to and approved in writing by the Local Planning Authority. The required detail shall include details of the person's qualifications, relevant experience and their supervisory role. The person shall be an appropriately qualified professional specialising in conservation work. Any proposed changes to the agreed supervision arrangements shall be subject subsequent re-discharge of the condition by the Local Planning Authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

9 Displaced Soil

Before the start of works details for storing, reusing and disposal of any soil displaced by the proposed works shall be submitted to and approved in writing by the Local Planning Authority. Priority should be given to the reuse of displaced soil within the cemetery, with consideration given to where the soil can be stored until it can be used and locations for reuse, such as providing fill in areas affected by settlement. Thereafter soil should be reused elsewhere and only as a last resort disposed of. The works shall be carried out in accordance with the details thus approved.

Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.

10 Archaeological Written Scheme of Investigation

No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and:

- a) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- b) Where appropriate, details of a programme for delivering related positive public benefits

c) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Reason: Important archaeological remains may exist on this site. Accordingly, the Local Planning Authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development in accordance with the requirements of policy D2 of the London Borough of Camden Local Plan 2017.

Prior to above ground works

11 Bird and bat boxes

Prior to above ground works, a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.

Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with G6 of the London Plan and Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.

12 Details of green or living roof

Prior to commencement of above ground works of Project 2, full details of the living roofs in the areas indicated on the approved roof plan shall be submitted to and approved in writing by the local planning authority. The details shall include:

- a) a detailed scheme of maintenance;
- b) sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used; and
- c) full details of planting species and density.

The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.

13 Layered aggregate concrete sample

Prior to the commencement of relevant works, a 1m square sample panel of the external facing layered aggregate concrete shall have been constructed on site for viewing and approved in writing by the Local Planning Authority. The sample panel

shall show the type, size, colour, bond, pointing, coursing, jointing, profile and texture of the material/facing surface including coping bricks/stones (if applicable).

The approved sample panel shall be retained on site and made available for inspection by the Local Planning Authority for the duration of the construction works. The works shall not be carried out otherwise than in accordance with the approved details.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

Before/during the relevant phase

14 Hard and Soft Landscaping and Enclosure

The relevant works shall not take place until full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. Such details shall include details of any proposed earthworks including grading, mounding and other changes in ground levels as well as submission of the following:

- a. Detailed drawings, samples of materials or schedules of works as appropriate
- b. Primary paths - details of the colour and size of aggregate to be used in the formation of the path surface and details of the path channel drains, and path kerb details.
- c. Secondary paths - details of the colour and size of the self-binding gravel.
- d. Method statement in relation to construction of pathways
- e. Method statement in relation to construction of drainage
- f. Pathway surface samples
- g. Any railings or balustrades
- h. Any external seating
- i. Details of replacement tree planting
- j. Roadside courtyards to the east and west cemetery entrances: material samples and details of planters and planting

N.B. Parts d-f should show where relevant consideration to securing the safety and stability of neighbouring monuments.

The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, A5, D1 and D2 of the London Borough of Camden Local Plan 2017.

15 Appointment of qualified engineer

The basement development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, check for compliance with the design (as approved by the local planning authority and building control body) and monitor the critical elements of both permanent and temporary basement construction works throughout their duration. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.

16 Cycle Parking Provision

During the relevant phase, the 10 short stay cycle spaces shall be installed in accordance with the approved drawings. The approved cycle spaces shall thereafter be permanently maintained and retained.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T2 of the London Borough of Camden Local Plan 2017.

17 Community and Education Building (Project 1) Details

Prior to the commencement of the Community and Education building, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site);
- b) Details including elevations and sections of all windows, doors, coping;
- c) Detailed drawings showing the positioning of slate tiles and a 1:2 details of any joints;
- d) Details of the skylight including 1:5 elevations and sections and product specifications;
- e) 1:5 details of any external handrails;
- f) Details of the new opening(s) in the boundary wall to Swain's Lane and new gates; and
- g) Details of rainwater goods in terms of appearance and connection to drainage

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

18 Visitor and Operations Building (Project 2) Details

Prior to the commencement of the Visitor, Operations and Volunteers building, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site).

- a) Details including elevations and sections at 1:10 of all windows, doors, shutters, external seating;
- b) 1:5 Details of the proposed interaction between canopy of the ticket office and colonnade;
- c) 1:5 details of any external handrails; and
- d) Details of rainwater goods in terms of appearance and connection to drainage

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

19 Courtyard Store Details (Project 4)

Prior to the commencement of courtyard store, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site);
- b) Details of proposed brick bond;
- c) Details including elevations and sections at 1:10 external doors; and
- d) Details of rainwater goods in terms of appearance and connection to drainage

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

20 East Side Sentries (Project 5)

Prior to the commencement of the East Side Sentries, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site).

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

21 Flood mitigation and flood resilience measures

Prior to commencement of works on the basement of Project 1 (Community and Education Building) and the tunnel cutting at the Anglican Chapel, full details of flood mitigation and flood resilience measures (for example installation of non-return valves, raised thresholds at ingress points, resilience measures of plant equipment) shall be submitted to and approved in writing by the local planning authority. The proposed works shall be carried out in accordance with the details thus approved.

Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

22 Terrace Catacombs and Siding Catacombs Drainage Strategy

Full details on the drainage strategy above Terrace Catacombs and around Siding Catacombs (expanding on details outlined in Appendix G of the Sustainable Drainage Strategy Report) shall be submitted to and approved in writing by the local planning authority. The works shall be carried out in accordance with the details thus approved.

Reason: To reduce the rate of surface water run-off on site and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.

23 SUDS Maintenance

Full details on the management and maintenance of SUDS shall be submitted to and approved in writing by the local planning authority. This is to include a schedule, required action and frequency for the above surface water drainage measures, who will manage this, and details on sump pumps. The works shall be carried out in accordance with the details thus approved.

Reason: To reduce the rate of surface water run-off on site and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.

24 Relocation of the Perkins Monument

Before the relevant works, further information on the removal, storage and relocation of the Perkins monument shall be submitted to and approved in writing by the local planning authority. The works shall be carried out in accordance with the details thus approved.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.

Prior to occupation or use

25 Demolition Waste

The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation of the relevant building, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.

Compliance conditions

26 Surface Water Drainage Proposals

All surface water drainage proposals are to be undertaken in line with the approved details. Systems shall thereafter be retained and maintained in accordance with the approved details.

1. Rainwater Harvesting System, with active attenuation underground tank at east side to capture and store surface water for subsequent irrigation (attenuation volume of 53m³)

2. Soakaway system (total attenuation storage and retention volume of 117m³): New Circle of Lebanon Soakaway - Volume of storage: 75m³, New Fielding & Dickens Path Soakaway- Volume of storage: 12m³, New The Meadow Path Soakaway - Volume of storage: 6m³, New Main Drive Upper Soakaway- Volume of storage: 17m³, New Faraday Path Soakaway (1)- Volume of storage: 3m³, New Faraday Path Soakaway (2)- Volume of storage: 2m³, New Faraday Path Soakaway (3)- Volume of storage: 2m³.

3. Permeable pavement (where soakaway systems are infeasible), gravel subbase and French drain with water treatment capacity. French drain is consisted of permeable paved surface and porous Type 3 subbase to provide attenuation storage.

4. Piped drainage system.

Reason: To reduce the rate of surface water run-off on site and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.

27 Landscaping works

All hard and soft landscaping works (including replacement tree planting) shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the phase of development. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by

not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, A5, D1 and D2 of the London Borough of Camden Local Plan 2017.

28 BIA including damage mitigation measures

The development shall not be carried out other than in strict accordance with the methodologies, recommendations and requirements of the Building Impact Assessment ref 3500-A2S-XX-XX-RP-Y-0002-00 dated October 2024 by A-squared Studio, hereby approved and in accordance with Basement Impact Assessment Audit Project No. 14291-45 date October 2025 rev D1 by Campbell Reith.

Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017

29 Second-hand bricks

Where second-hand or salvaged bricks are to be used, these are to be entirely cleaned of paint, soot and any other coatings before reuse.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

30 No Punctuations, Extraneous Pipework or Fixtures

No additional punctuations in the external walls and roofs shall be permitted other than as shown on the drawings hereby approved. No soil stacks, soil vent pipes, plumbing, pipes, flues, vents or ductwork shall be fixed on the external faces of the building other than those shown on the drawings hereby approved.

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 or any subsequent or superseding orders, no lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the building, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

31 Non-road mobile machinery (NRMM)

No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.

32 Noise limits for plant

The external noise level emitted from plant, machinery or equipment at the development, with any specified noise mitigation hereby approved, shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and surrounding properties is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

33 Anti-vibration isolators for plant

Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

34 Roof Terraces

No flat roofs within the development shall be used as terraces/amenity spaces unless marked as such on the approved plans, without the prior approval in writing of the Local Planning Authority.

Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy A1 of the Camden Local Plan.

35 Disable ASHPs for Active Cooling

Prior to first use of any of the air source heat pumps hereby approved, the active cooling function shall be disabled on the factory setting and the air source heat pumps shall be used for the purposes of heating only.

Reason: To ensure the proposal is energy efficient and sustainable in accordance with policy CC2 of the London Borough of Camden Local Plan 2017.

Building regulations (imposed optional requirements)

36 Water Use (building control optional requirements)

The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, with an additional 5 litres/person/day for external water use.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

20. LISTED BUILDING CONSENT CONDITIONS

Pre-start conditions (any works)

37 Expert Supervision

Prior to commencement of development, details of the person who will supervise the hereby approved works of alteration or demolition shall be submitted to and approved in writing by the Local Planning Authority. The required detail shall include details of the person's qualifications, relevant experience and their supervisory role. The person shall be an appropriately qualified professional specialising in conservation work. Any proposed changes to the agreed supervision arrangements shall be subject subsequent re-discharge of the condition by the Local Planning Authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

Before/during the relevant phase

38 Swains Lane Boundary Wall Openings

The wall must be hand dismantled where new gate openings are proposed and bricks are to be salvaged and stored for re-use on site.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

39 Settlement Cracks in the Swains Lane Boundary Wall & Tunnel

The Swains Lane Boundary Wall and historic tunnel below are to be monitored throughout basement and construction works and regularly throughout the duration of the masterplan works to ensure settlement cracks are identified and repointed with a suitable lime mix as appropriate.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

40 Chapel Building Details (Project 3)

Prior to the commencement of relevant works, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Details including sections at 1:10 of all secondary glazing;
- b) Plan, elevation and section drawings of the internal steel framing;
- c) Method statement and full elevations demonstrating locations of the shelter coat;
- d) Details of internal wall finishes;
- e) Details of floor finishes; and

e) Details of window vents.

f) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials and workmanship samples (to be provided on site).

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

41 Courtyard Public Realm (Project 7)

During the relevant phase, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

(a) York Stone replacement floor within the Colonnade

(b) Self-binding gravel finish to the Courtyard

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

42 Terrace Catacombs details (Project 10)

During the relevant phase, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

(c) Gate

(d) Vault repair works

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

43 Terrace Catacombs and Siding Catacombs Drainage Strategy (Project 10)

Full details on the drainage strategy above Terrace Catacombs and around Siding Catacombs (expanding on details outlined in Appendix G of the Sustainable Drainage Strategy Report) shall be submitted to and approved in writing by the local planning authority.

Reason: To safeguard the structural stability and appearance of the structures and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

44 Mausolea details (Project 10)

During the relevant phase, and before commencement of any works on any particular funerary structures/mausolea, detailed drawings, information or samples of materials for each, as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

- a) Schedule of works including elevations and details or proposed methods of repair
- b) Samples of new facing materials

In terms of specific mausoleum, the Da Silva Mausoleum will require information on repair approach and new door, the Foster Mausoleum will require information on new door and the Hartley Mausoleum requires clarification regarding access/ new door.

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.

45 Tunnel Details

Prior to the commencement of any works to the tunnel or Education Building, detailed drawings, samples of materials or schedules of works as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Method statement for the removal of the concrete screed floor;
- b) Detailed drawings and samples of the proposed replacement floor including cross sections showing any insulation; and
- c) Schedule of works to include details of the cleaning and restoration of the tunnel walls and date stone including locations of the proposed shelter coat.

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

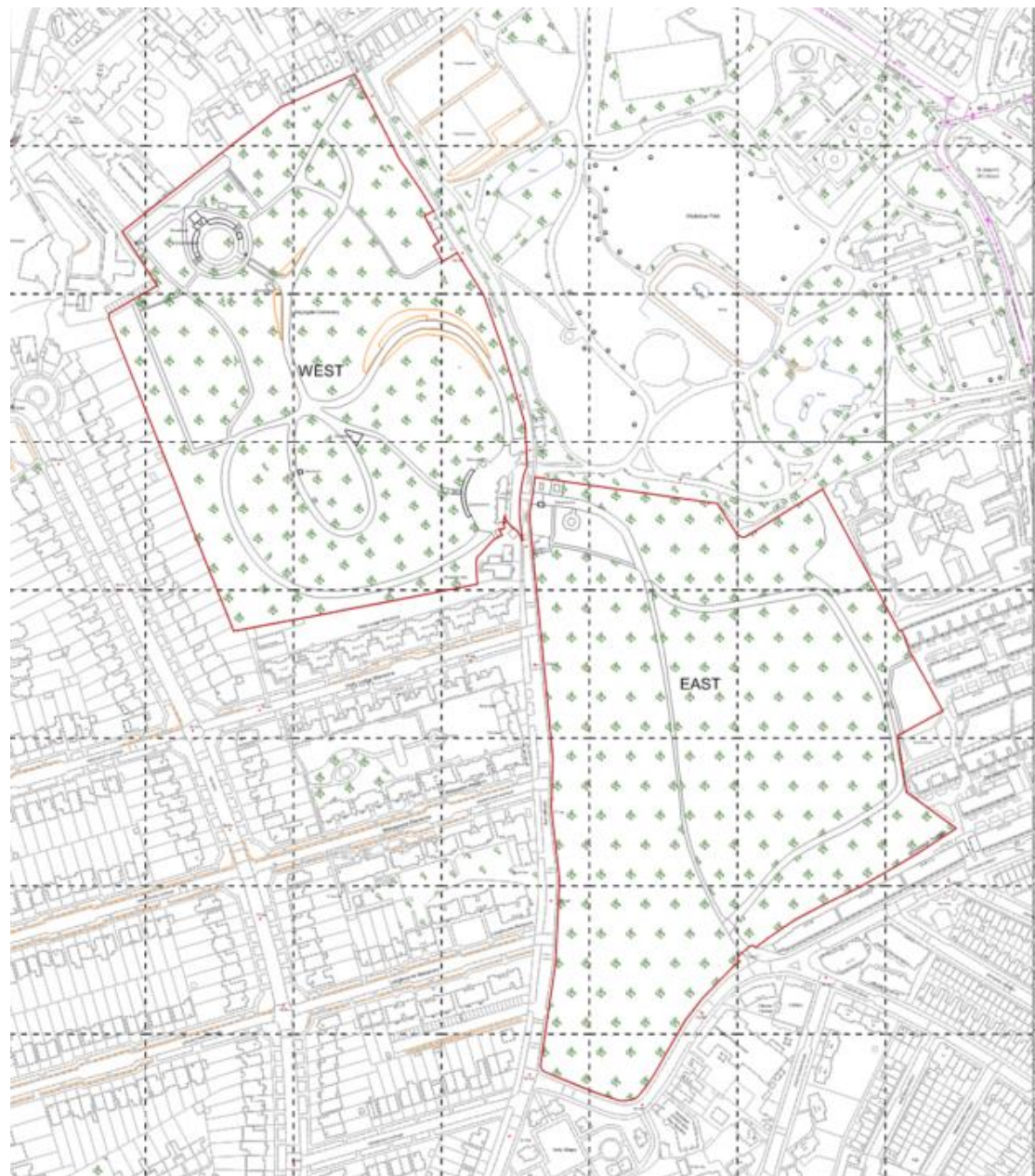
21. INFORMATIVES

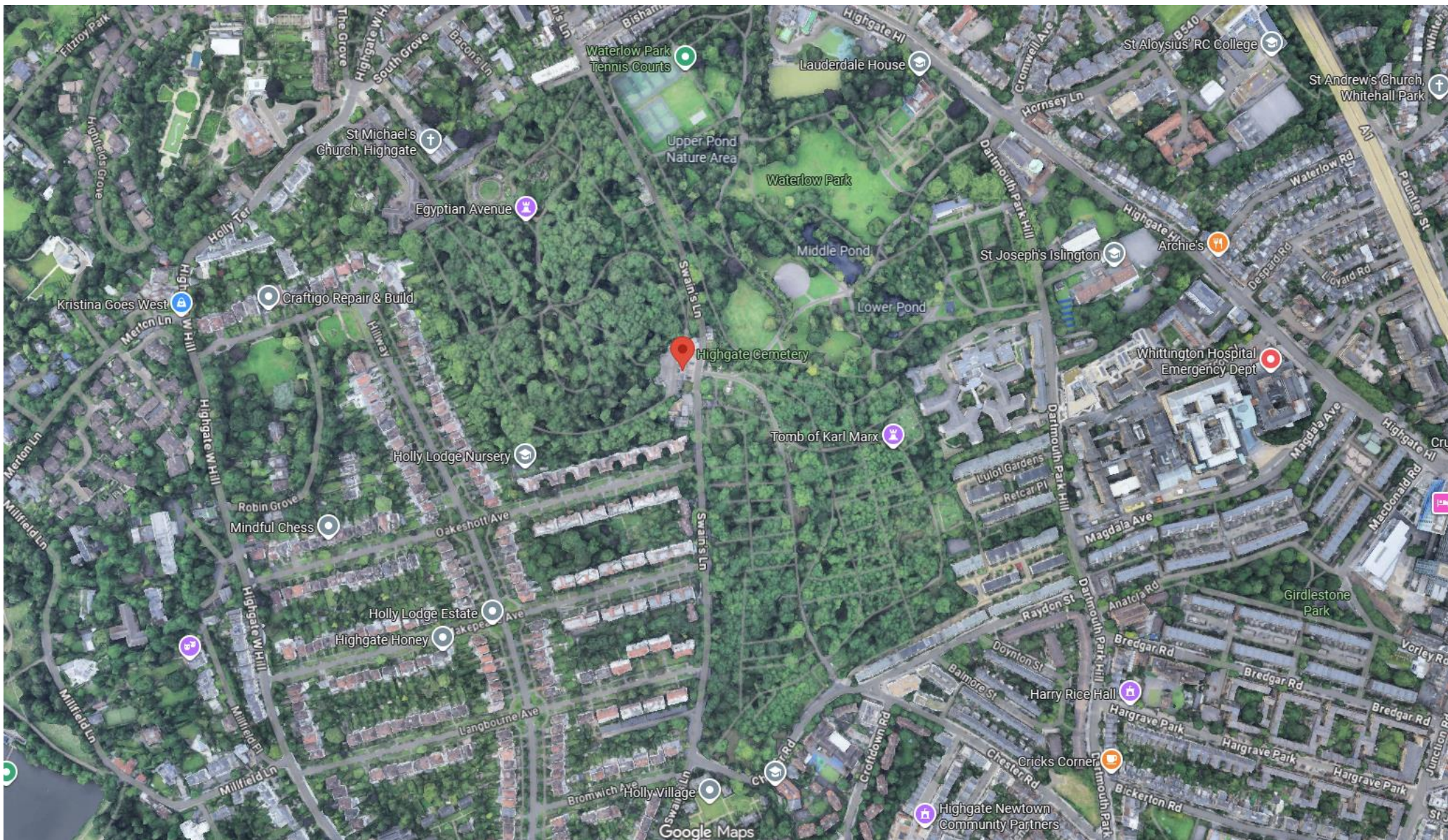
1	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
2	You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.
3	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444).</p> <p>Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
4	In good time, prior to the start of construction (or if appropriate, demolition) on site, the contractor shall discuss and agree with the Council's Engineering Service Network Management team (tel: 020-7974 2410) detailed arrangements for the transportation of goods and materials to and from the site. The Council will prosecute those responsible for any breaches of the provisions of the Highways and Litter Acts which occur as a result of construction on the site.
5	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
6	You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into

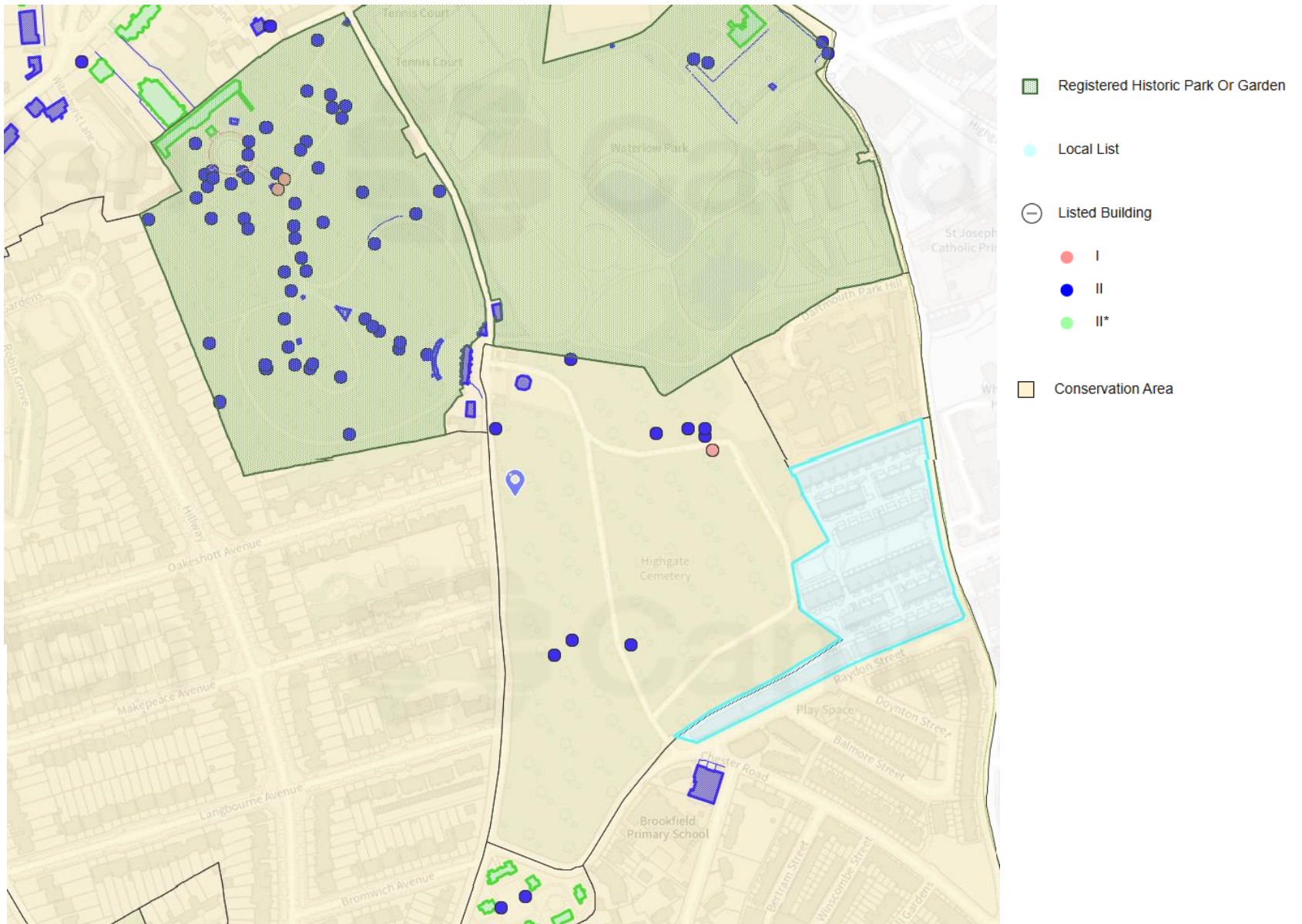
	<p>consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at https://beta.camden.gov.uk/web/guest/construction-management-plans or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.</p>
7	<p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice. Camden adopted new CIL rates in October 2020 which can be viewed at the above link.</p>
8	<p>Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.</p>
9	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
10	<p>This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.</p>
11	<p>Biodiversity Net Gain (BNG) Informative (1/3):</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:</p> <ul style="list-style-type: none"> (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan. <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p>

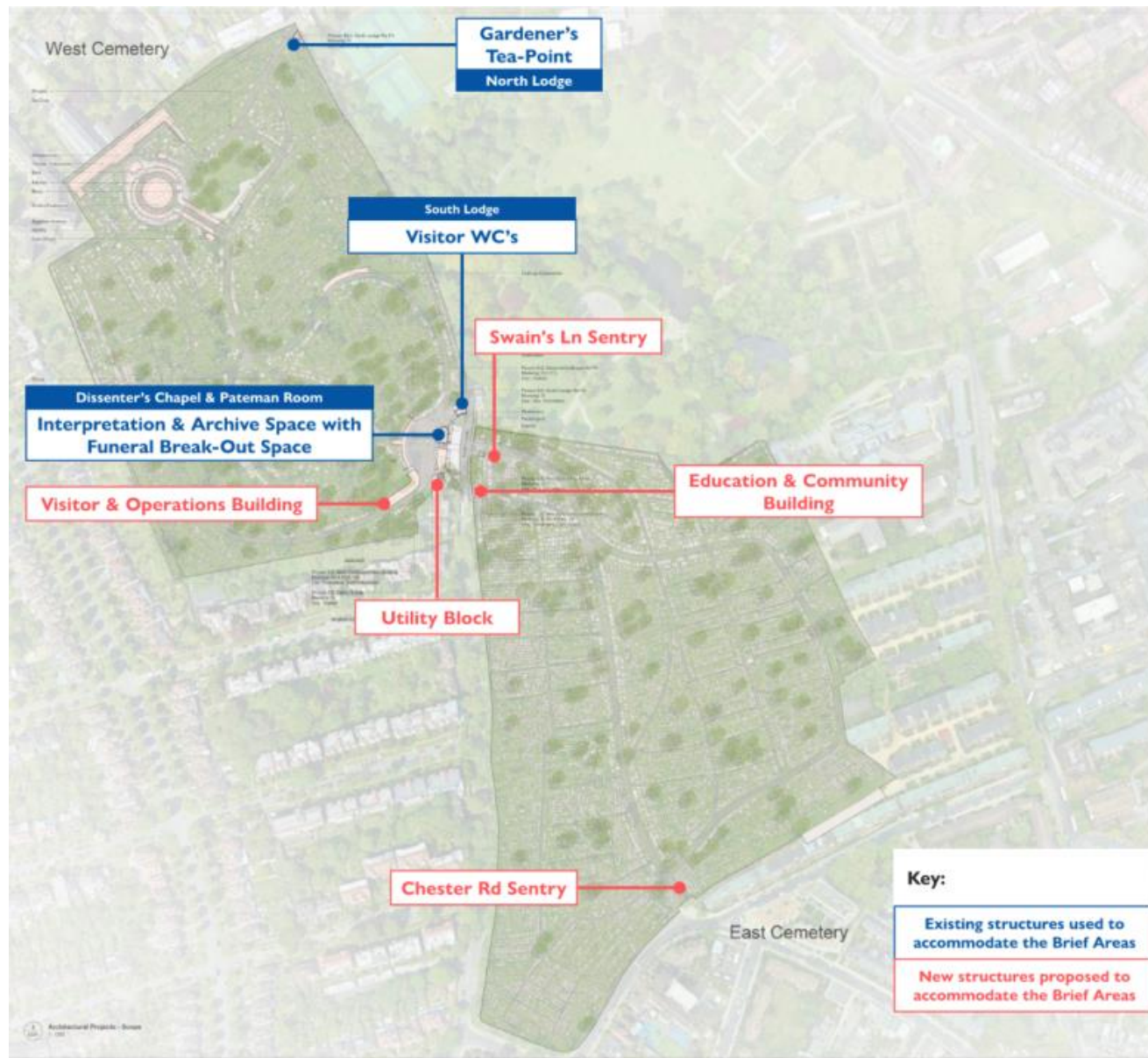
	<p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this permission WILL require approval of a BGP before development is begun because none of the statutory exemptions or transitional arrangements summarised below are considered to apply.</p>
12	<p>Biodiversity Net Gain (BNG) Informative (2/3):</p> <p>+ Summary of transitional arrangements and exemptions for biodiversity gain condition</p> <p>The following are provided for information and may not apply to this permission:</p> <ol style="list-style-type: none"> 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024. 4. The permission is exempt because of one or more of the reasons below: <ul style="list-style-type: none"> - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024. - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
13	<p>Biodiversity Net Gain (BNG) Informative (3/3):</p> <p>+ Irreplaceable habitat:</p> <p>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p> <p>+ The effect of section 73(2D) of the Town & Country Planning Act 1990</p> <p>If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions</p>

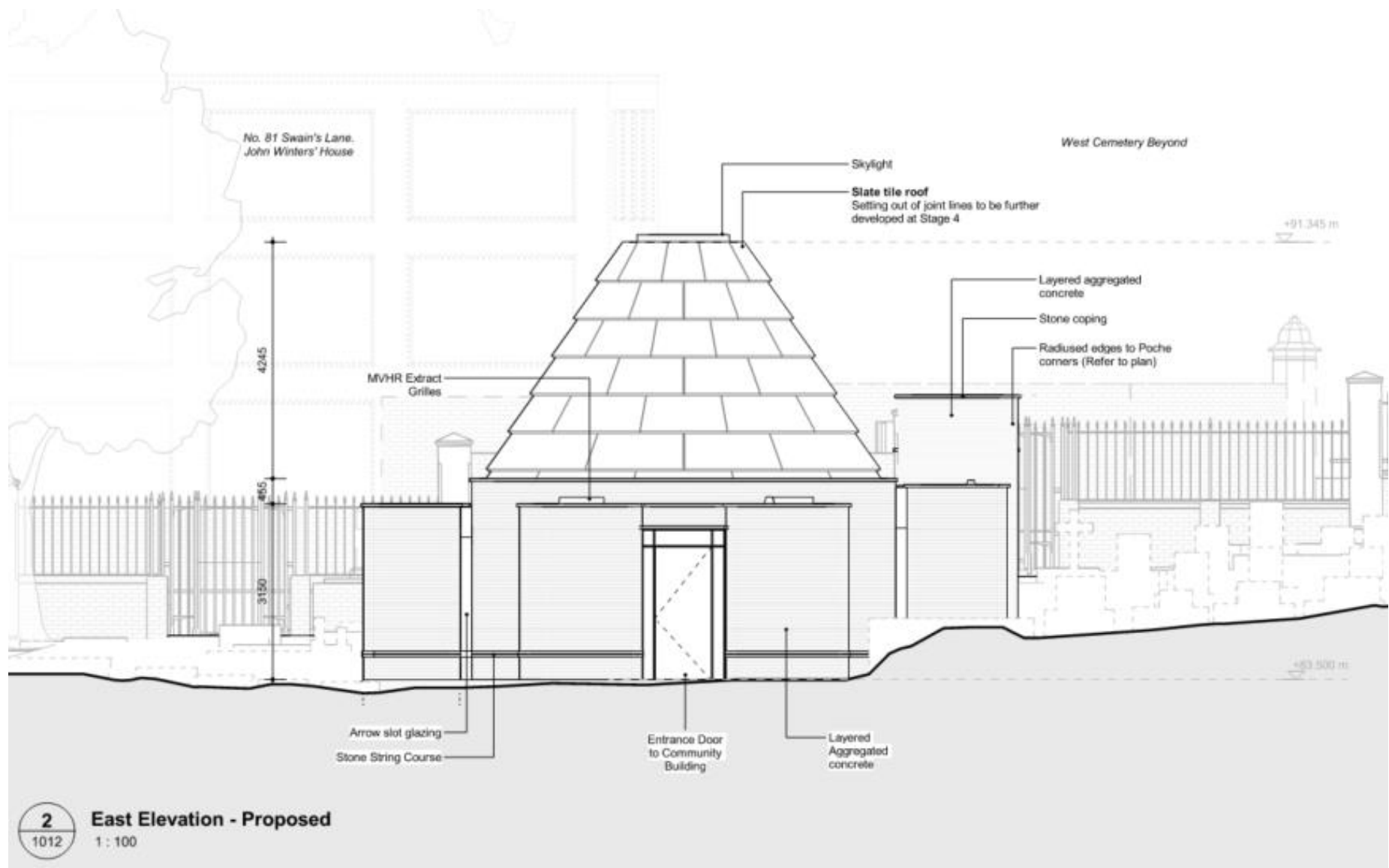
	<p>attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>+ Phased development</p> <p>In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</p>
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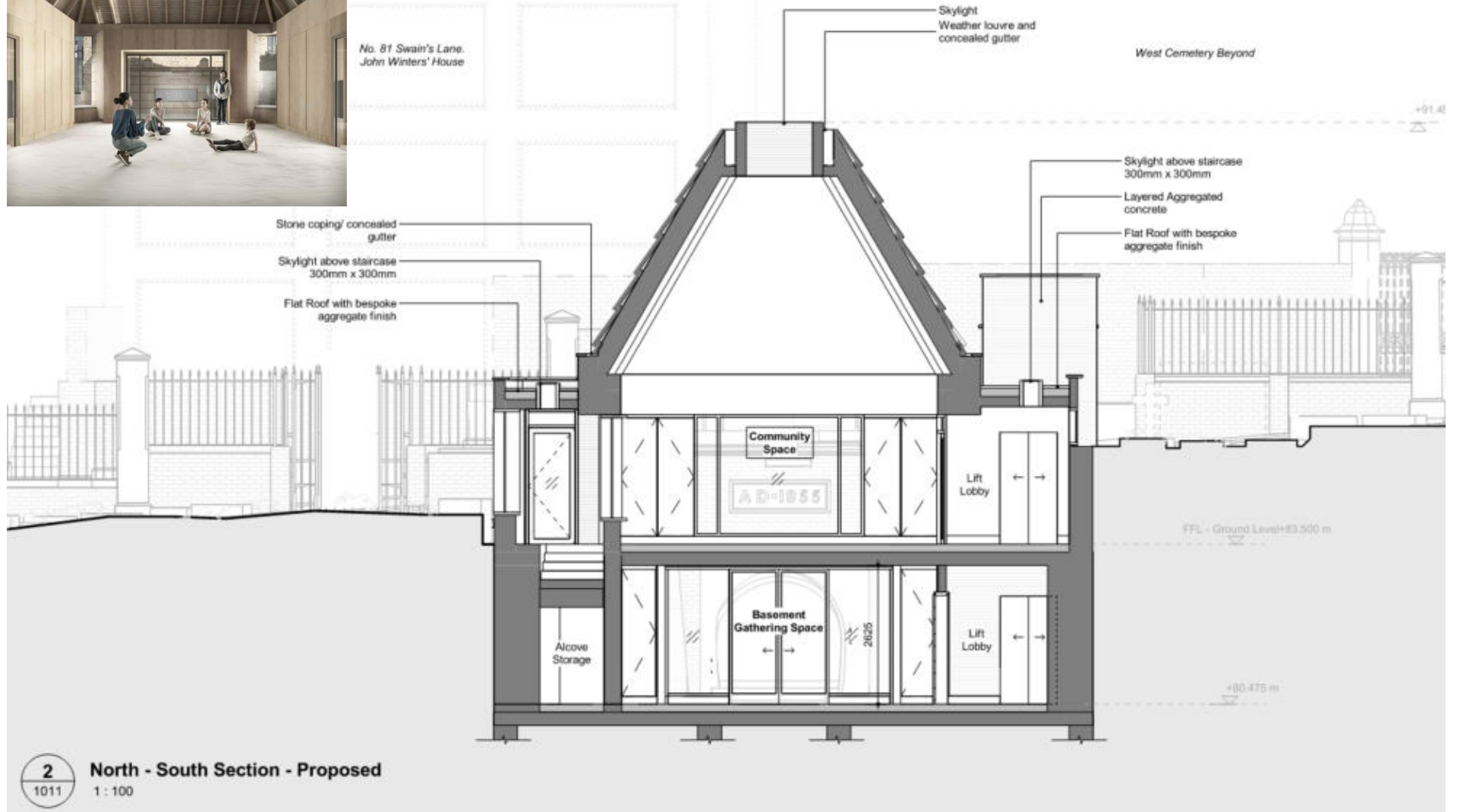


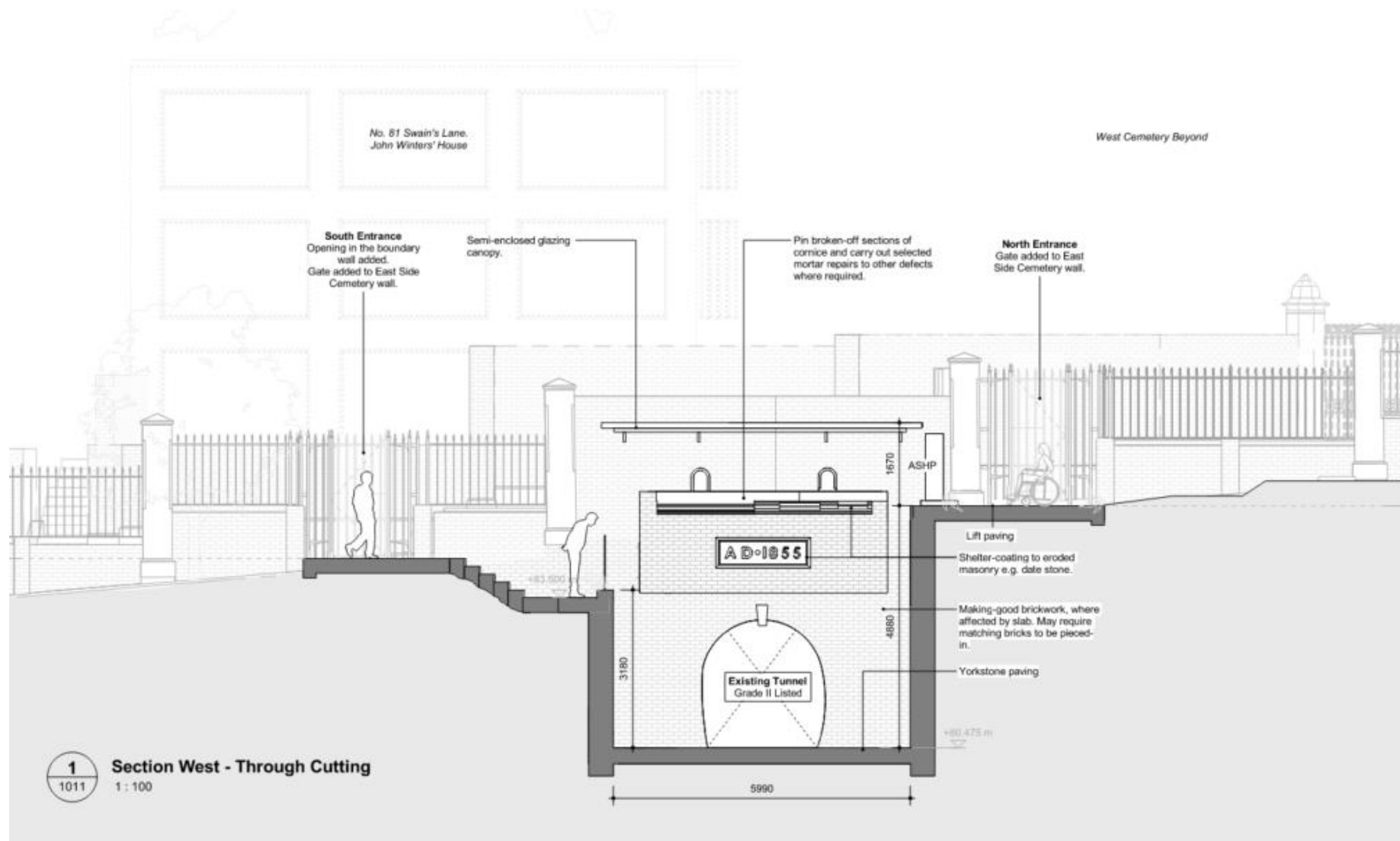




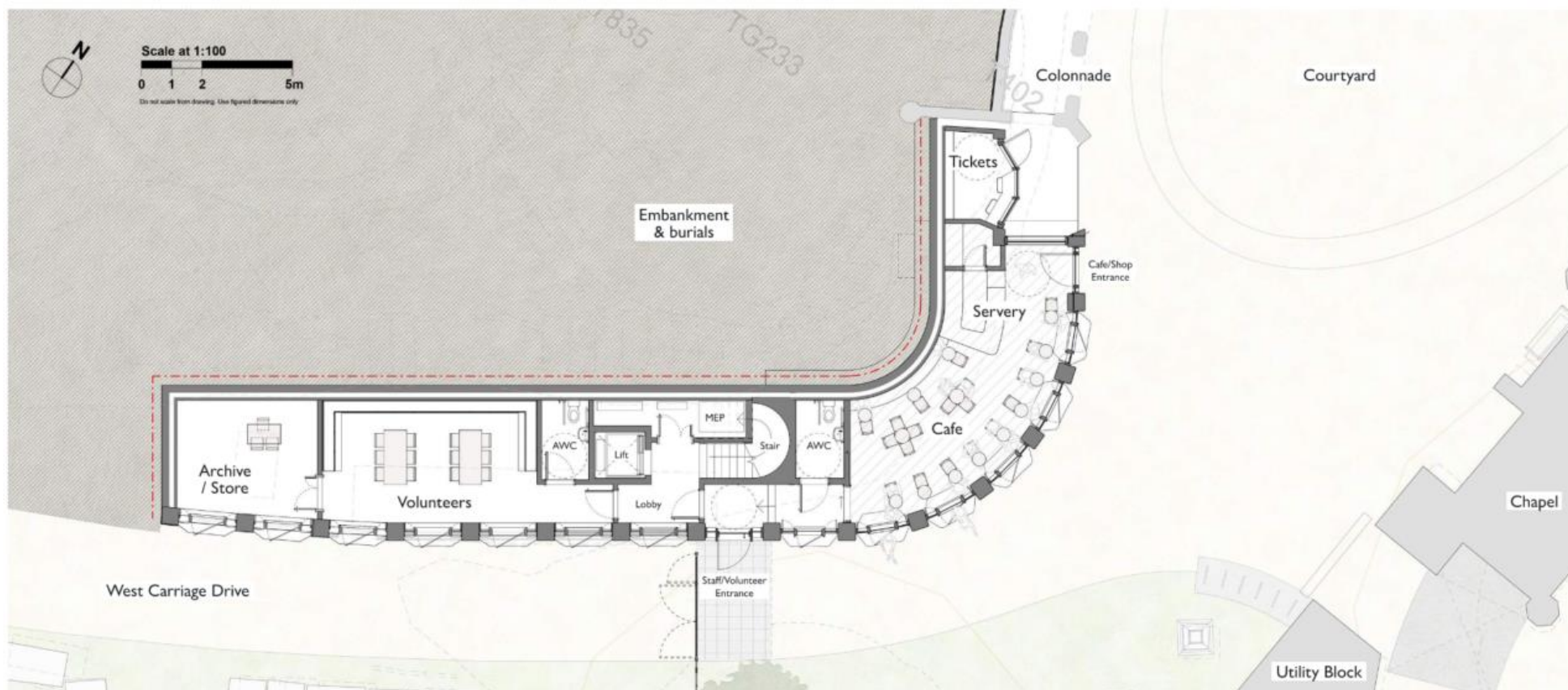


No. 81 Swain's Lane,
John Winters' House









Proposed Ground Level Plan



Illustrative View 5: West Carriage Drive, looking west.



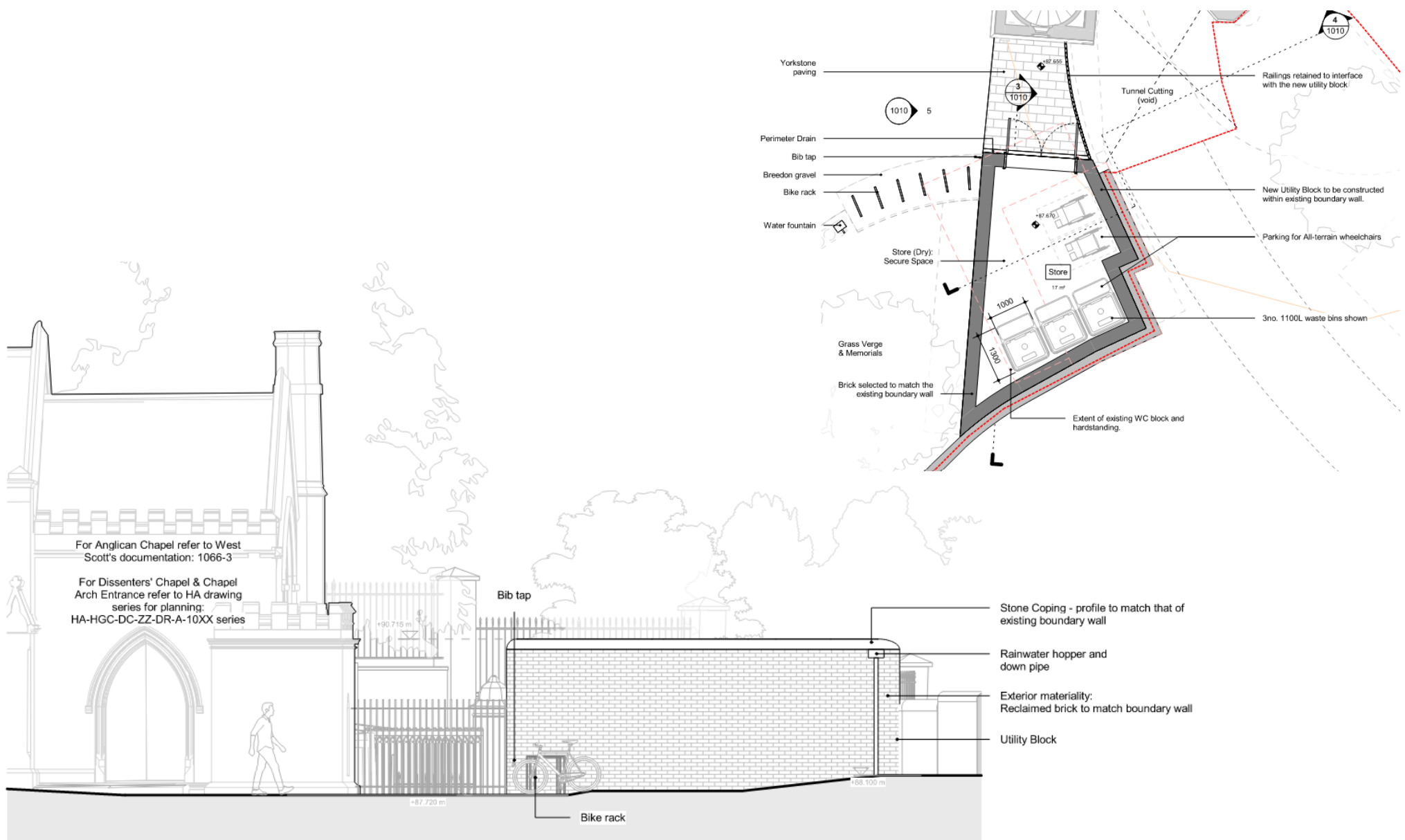
Illustrative View 4: Proposed Cafe interior.

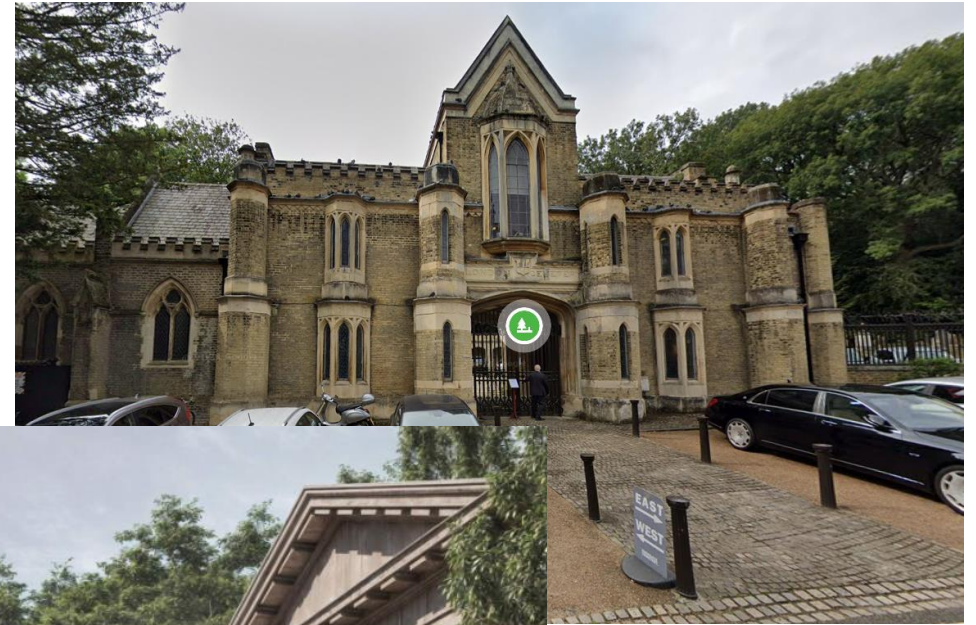


Illustrative View 2: Proposed Visitor & Operations Building Ticketing Booth



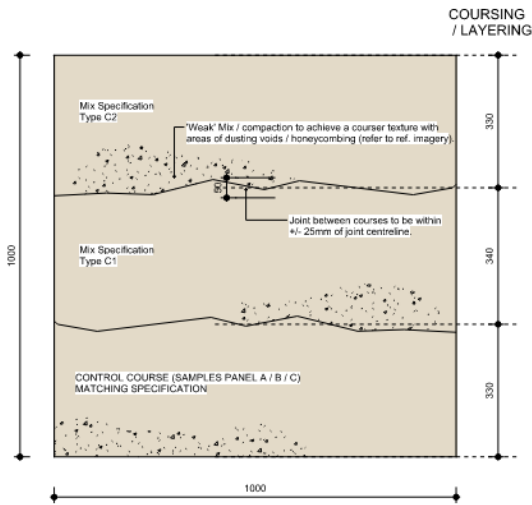
Illustrative View 3: Proposed Visitor & Operations Building Operations from WCD.



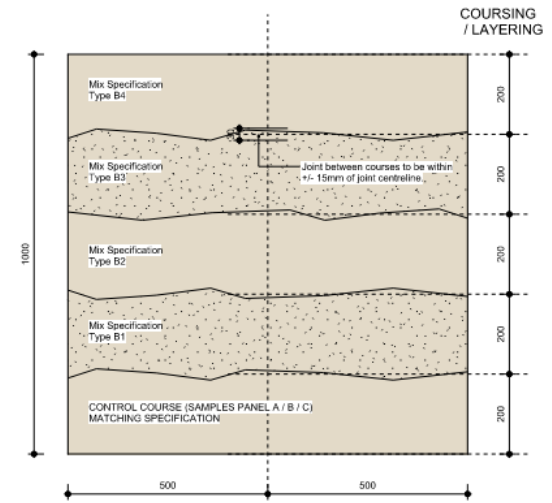




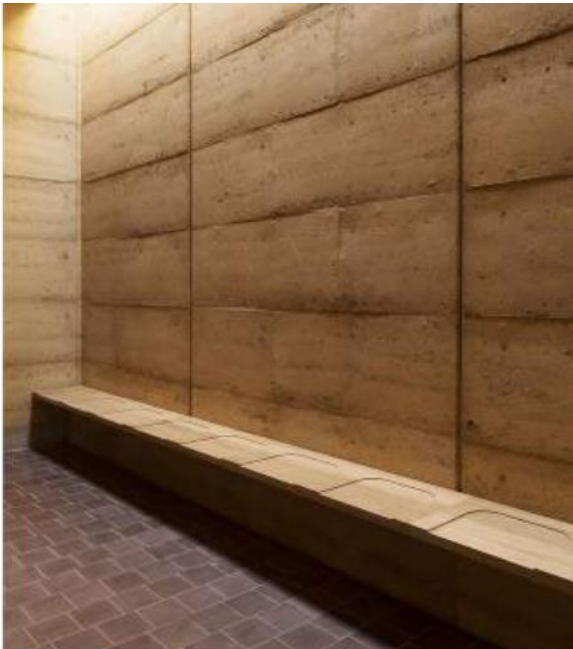
Intended Finish



Stage 1 : Sample Panel C (subject to development)



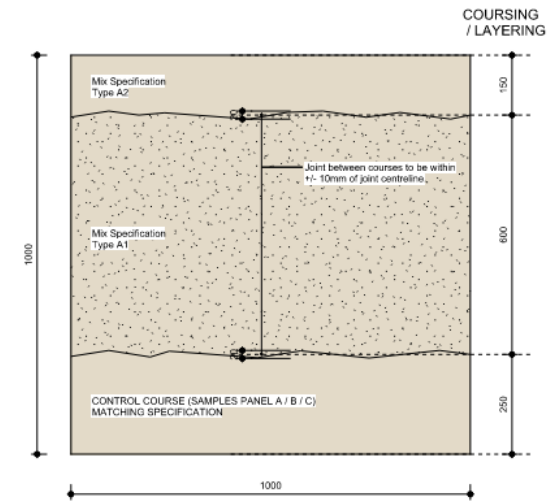
Stage 1 : Sample Panel B (subject to development)



New Buildings at Bushey Cemetery, Waugh Thistleton



Yoga Studio, Invisible Studio



Stage 1 : Sample Panel A (subject to development)

Graveside planting



"Affliction, brightened by hope, ever renders man more anxious to love his neighbour. At the brink of the grave we are made most feelingly alive to the shortness and uncertainty of life, and to the danger of procrastinating towards God and man whatever it is our bounden duty to perform. There, too, the conscience is taught the value of mercy, and best feels the recompense which awaits the just in Heaven" C.J.Loudon



* Indicates species existing on site
Catalogue of the Brompton Botanic Garden

A Indicates species on C.J.Loudon's list of plants for use in Cemeteries

A Indicates species that appear in the

Perennials

Geranium phaeum 'Album'
**Dryopteris filix-mas*
Polystichum setiferum 'Herrenhausen'
Dicentra spectabilis
**Polygonatum x hybridum*
**Helleborus orientalis*

*Primula vulgaris

Blechnum spicant
**Erigeron karvinskianus*
Epimedium x versicolor
**Fragaria vesca*
**Galium odoratum*

Bulbs

**Galanthus nivalis*
Leucojum vernum
Crocus tommasinianus
**Whitewell Purple*
Narcissus 'Jenny'
Leucojum aestivum
**Gravetye Giant*

Terrace Catacombs



John Lloyd in 1888 presents the view from the Terrace as the climax of the visitor experience: 'On entering the grounds, the eye is struck by the taste with which nature is combined with art, all the beauties of situation being improved by cultivation and taken the fullest advantage of. Broad gravel paths wind up either side'



Key Plants

Shrubs

Fuchsia magellanica gracilis
Fuchsia magellanica 'Alba'
Buddleia lindleyana
Ceanothus thyrsiflorus var. *repens*

Sarcococca hookeriana *Brunnera macrophylla*

Perennials

Polystichum setiferum
**Herrenhausen*
Helleborus orientalis
**Primula vulgaris*
Blechnum spicant
Erigeron karvinskianus

Bulbs

Galanthus nivalis
Chionodoxa forbesii 'Blue Giant'

*All planting subject to further detailed soil analysis and positioned according to aspect

Circle of Lebanon

PLANTING STRATEGY

JO THOMPSON
LANDSCAPE
GARDEN DESIGN

Gustafson
Porter +
Bowman

Circle of Lebanon - eventual planting (in shade of the Cedar)



* Indicates species existing on site of the Brompton Botanic Garden

A Indicates species on C.J. Lawson's list of plants for use in Cemetery

A Indicates species that appear in the Catalogue

Perennials

*Cyclamen hederifolium
*Carex remota
*Dryopteris filix-mas
Polystichum setiferum 'Herrenhausen'
*Primula vulgaris
Blechnum spicant

Bulbs

*Galanthus nivalis
Leucojum vernum
Crocus tommasinianus 'Whitewell Purple'
Leucojum aestivum 'Gravetye Giant'

Inner Graveside Planting

We suggest the intermingling of flowering woodland shrubs with evergreen woody plants - Ruscus aculeatus and viburnum along with the heavily scented Sarcococca, which will revel in winter conditions, protect their more delicate neighbours in winter whilst in turn being offered vital protection by the shade of the canopy above in summer.



* Indicates species existing on site Catalogue of the Brompton Botanic Garden

A Indicates species on C.J. Lawson's list of plants for use in Cemetery

A Indicates species that appear in the

Shrubs

Corylopsis pauciflora
Callicarpa bodinieri
Chimonanthus praecox
*Euonymus europaeus
Jasminum nudiflorum
Lonicera standishii

Rhododendron ovatum

*Rosa canina
*Ruscus aculeatus
Sarcococca hookeriana,
Himalayan Sweet Box
*Sambucus nigra,
Elderflower

*Symphoricarpos albus,

Snowberry
Syringa oblata
Viburnum lantana, Wayfaring Tree
Viburnum opulus, European
Cranberry Bush
Viburnum tinus, Laurusinus

6.12 South Edge Spring (West Carriage Drive)

CHARACTER

Gustafson
Porter +
Bowman

At their southern end, the Dickens and Neurath Paths meet West Carriage Drive which wraps around the damp ground at the base of White Eagle Hill and the Meadow. A natural spring runs between the west boundary and the drive and in future will be managed to ensure it doesn't flood during heavy rainfall. Along the south boundary the drive passes close to the rear of the Holly Lodge Estate. The majority of the path is currently closed to visitors, as it has become the location for the maintenance team's activities. As it is the most accessible of the three paths that climb the hillside to Comfort's Corner and with the introduction of the Café and Operations Building at its entrance from the Courtyard, it makes sense to re-open it to visitors.

The majority of trees in this area of the woodland are Ash. Their removal will allow additional sunlight into this damp area, creating the conditions for a wet woodland, with a diverse range of native plants. Beside the west boundary we propose replacing the Ash (*Fraxinus excelsior*) with Manna ash (*Fraxinus ornus*) which isn't affected by Chalara ash dieback and flowers white in summer. These are mixed with Silver lime (*Tilia tomentosa*), which has clusters of fragrant small white flowers. At the base of the spring on damp ground we propose Alder (*Alnus glutinosa*). On the south boundary we propose evergreen Holm oaks (*Quercus ilex*) mixed with Hop Hornbeam (*Ostrya carpinifolia*), the former to screen the cemetery from the neighbouring estate, the latter with its catkins in late summer and yellow autumn leaves, providing seasonal character.

Existing Character:

Ash - 90%, Silver birch, Holm oak, Yew

Understory: Hawthorn, Holly, Privet, Irish yew, Yew, Mock orange, Common lime

Groundcover: Ivy

*nesting plank list from Bartlett Tree

Significant Monuments:

Stevens, Hastings

Proposed Tree Species:



Silver Linden
(*Tilia tomentosa*)



Hungarian Oak (*Q. frainetto*)



Hornbeam
(*Carpinus betulus*)



Holm Oak
(*Quercus ilex*)



Manna Ash
(*Fraxinus ornus*)

Proposed Habitat Types:

HP1 - High profile areas-edge of paths (sunny and shaded areas)

WW1 - Wet woodland with shade on heavy soils

WW2 - Wet woodland with sun on heavy soils

