
Planning Statement

Cemetery Lodge, Thornton Road, Croydon,
CR7 6BB

London Borough of Croydon

February 2024

Planning Statement

Cemetery Lodge, Thornton Road, Croydon, CR7 6BB



Contents

| | | |
|----|-----------------------------|----|
| 1. | Introduction | 1 |
| 2. | Background | 3 |
| 3. | Proposed Development | 5 |
| 4. | Planning Policy Context | 6 |
| 5. | Key Planning Considerations | 9 |
| 6. | Conclusions | 19 |

1. Introduction

- 1.1 This Planning Statement has been prepared in support of an application for full planning permission submitted to the London Borough of Croydon (LBC) on behalf of the London Borough of Croydon (the applicant) for the proposed development at the site for new site access at Cemetery Lodge, Thornton Road, Croydon, CR7 6BB (the site).

Description of Development

- 1.2 This Planning Statement is submitted in support of an application which seeks full planning permission for the following:

“Creation of new vehicular access to Cemetery Lodge from Thornton Road, including alterations to the boundary wall, insertion of new vehicular access gates and associated landscaping.”

- 1.3 This Statement assesses the main planning considerations associated with the proposed development in the context of national, regional and local planning policy and guidance.
- 1.4 This application is made on behalf of the London Borough of Croydon, to the London Borough of Croydon to facilitate the sale of the site by the LPA. LBC are currently in the process of disposing a number of Council owned sites which will assist in tackling the LPA’s debt. The purpose of this application is to provide a new vehicular access route into the site as the applicant can no longer utilise the existing route via the adjoining cemetery. As such, the site requires an access route before it can be sold by the LPA. Without the provision of a new access route into the site, the currently vacant site is at risk of becoming sterile and therefore inaccessible and unusable by anyone. This application seeks to provide access to this sustainably located brownfield site.

Supporting Documents

- 1.5 This Planning Statement should be read in conjunction with the plans and drawings prepared by Pencilmen Architects, as well as the following documents which have been prepared to address the full range of planning considerations:
- Architect’s Plans, prepared by Pencilmen Architects;
 - Design and Access Statement, prepared by Pencilmen Architects;
 - Arboricultural Implications Report, prepared by SJA Trees; and
 - Transport Assessment, prepared by Transport Planning Associates.

Structure of the Statement

1.6 The structure of this Planning Statement is as follows:

- **Section 2** provides a description of the site and surrounding context as well as the background to the proposals;
- **Section 3** provides a summary of the development proposals;
- **Section 4** sets out the relevant planning policy framework;
- **Section 5** provides a detailed assessment of the main planning considerations arising from the application proposals; and
- **Section 6** provides a summary of the proposals and our conclusions on the planning considerations.

Planning Statement

Cemetery Lodge, Thornton Road, Croydon, CR7 6BB



- 2.3 The site does not contain any statutory or locally listed buildings or structures, is not located within a Conservation Area, and is not located within an Archaeological Priority Area (or similar). However, the site is located within a locally listed historic park and garden, an undesignated heritage asset. Additionally, the site falls with Metropolitan Open Land and is partly designated as a Site of Nature Conservation Importance. The site fronts onto the Strategic Road Network.
- 2.4 With reference to the Government's online Flood Map for Planning, the site is located within Flood Zone 1 indicating the lowest probability of river and / or sea flooding.
- 2.5 Immediately adjacent to the sites eastern boundary lies an MOT centre and a Sainsburys Local. The northern and western boundaries are occupied by Thornton Road Cemetery with the sites' southern boundary fronting onto the A23 / Thornton Road. The surrounding area is primarily residential in nature with West Retail Park sitting c. 250m south of the sites' existing entrance. Two storey domestic dwellings predominate although there is a development rising to five storeys fronting Thornton Road adjacent to the Cemetery's southwestern boundary.

Planning History

- 2.6 With reference to the Council's online planning application register there have been no recent planning applications for the comprehensive development at the site. The table below summarises the planning application history at the site - the majority of which relate to minor alterations to the existing building.

| Reference | Proposal | Decision | Decision Date |
|------------|--|-----------|--------------------|
| 98/02034/P | Retention of portacabin in rear garden | Granted | 12th November 1998 |
| 98/02035/P | Retention of portacabin in rear garden | Withdrawn | 12th November 1998 |
| 97/01213/P | Retention of portacabin in rear garden | Granted | 16th October 1997 |
| 97/00704/P | Use for storage purposes and to provide testing facilities for environmental health and trading standards department | Granted | 5th June 1997 |
| 97/1333/B | Internal Alterations | Granted | 29th August 1997 |

3. Proposed Development

- 3.1 This section provides a summary of the application proposals; full details are provided within the application drawings prepared by Pencilmen Architects which have been submitted in support of this application.
- 3.2 This application proposes to create new vehicular access to the site from Thornton Road, to provide the site with a stand alone entrance. In order to facilitate the new access route, it is proposed to alter the existing boundary wall to provide gated access as shown in Figure 3.1 below.

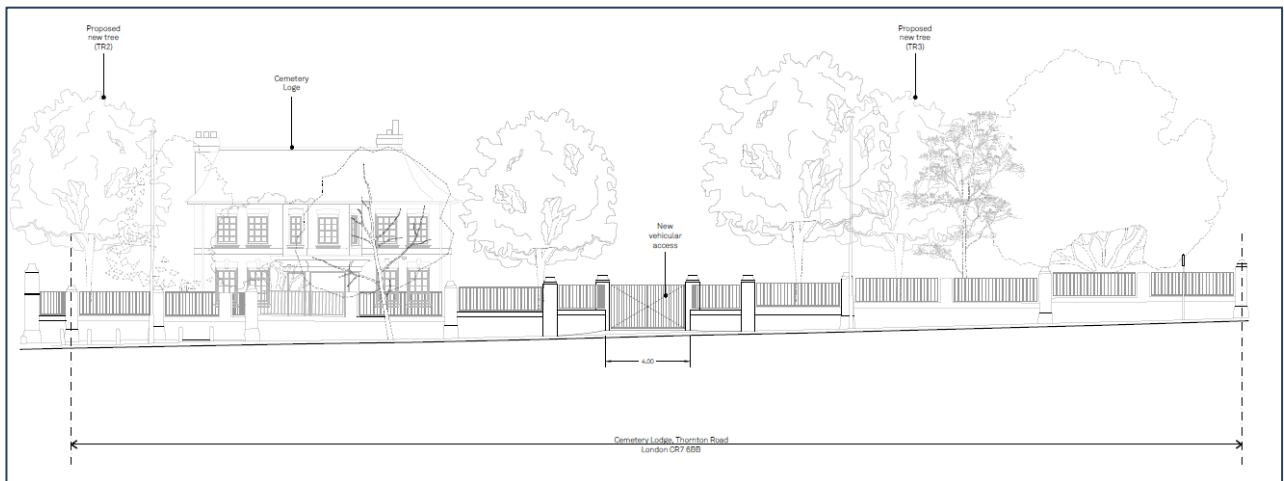


Figure 3.1: Proposed Elevation

- 3.3 Access is provided from Thornton Road as existing. However, the proposed development would allow for the site to be accessed independently of the cemetery and its associated gardens.
- 3.4 The existing site comprises of a variety of trees. It is proposed to remove three tree and provide two new trees and associated landscaping across the site which will assist in the creation of a new western landscaped boundary between the site and the cemetery. Further details are provided within Section 5 below.

4. Planning Policy Context

- 4.1 The proposals have taken account of relevant national and local planning policy. This section of the Planning Statement sets out a brief summary of the relevant planning policy documents and the following sections demonstrates compliance with their policies.
- 4.2 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 4.3 The development plan comprises:
- London Plan (2021);
 - Croydon Local Plan (2018); and
 - South London Waste Plan (2022).
- 4.4 The National Planning Practice Guidance (2014, as amended), Supplementary Guidance notes (SPGs) and Supplementary Planning Documents (SPDs) are all relevant material considerations and will be referred to where necessary and appropriate.
- 4.5 The revised NPPF (December 2023) directs a presumption in favour of sustainable development which underpins the Framework. The National Planning Practice Guidance (NPPG) provides clarity and guidance on the interpretation of policy.

National Planning Policy

- 4.6 At the national level, the Government published its revised National Planning Policy Framework (NPPF) in December 2023. The NPPF provides an overarching framework for the production of local policy documents and at the heart of this document is a presumption in favour of sustainable development.
- 4.7 Achieving sustainable development means that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). Sustainable development is defined through three, interdependent objectives:
- **An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

- **A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with assessable services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.8 In the next sections of this Planning Statement, an assessment of the proposed development against the relevant paragraphs of the NPPF is undertaken. However, importantly, paragraph 11 of the NPPF is clear that development that accords with the development plan should be approved without delay.

4.9 In support of the NPPF, the Government has published an online guidance resource, known as the Planning Practice Guidance (NPPG). This covers a range of topics including procedural matters, policy application matters, extended guidance on certain topics and clarifications on processes. Where relevant, specific notes are referred to within this Planning Statement.

Local Planning Policy

4.10 As set out above, the current statutory development plan for the London Borough of Croydon comprises following:

- London Plan (2021);
- Croydon Local Plan (2018); and
- South London Waste Plan (2022).

4.11 LBC are undertaking a partial Local Plan review in order to update the currently adopted Local Plan for the borough. The review will update the vision and strategy for Croydon's growth up to 2039 and set out how the council will continue to deliver much needed new homes. The Regulation 19 Local Plan was consulted on in January 2022.

4.12 It is understood that the Local Plan Review will undergo submission consultation in January - February 2024, ahead of submission to the Secretary of State in summer 2024. This is expected to be a new version of the Local Plan Review document, and will include changes arising from the 2022 consultation, the new Mayor's Business Plan, as well as changes resulting from updates to legislation and available evidence. At this stage, no weight is being applied to the emerging local plan policies.

Planning Statement

Cemetery Lodge, Thornton Road, Croydon, CR7 6BB



4.13 The site is subject to the following planning policy designations, as set out on the Council's adopted Policies Map (2018):

- Locally Listed Historic Parks and Gardens;
- Metropolitan Open Land;
- Partly designated as a Site of Nature Conservation Importance;
- Fronts onto the Strategic Road Network; and
- Flood Zone 1, the lowest risk flood zone.

5. Key Planning Considerations

5.1 This section sets out the main planning consideration arising from the application proposals with reference to the planning policy framework set out at Section 4.

Principle of Development

5.2 The general thrust of national and local planning policy and guidance is to secure sustainable patterns of development and regeneration through effective use of land driven by a plan-led system, to ensure the delivery of sustainable economic, social and environmental benefits. The NPPF also promotes the efficient use of land in accessible locations and encourages the use of previously developed sites to maximise development potential.

5.3 The proposal will deliver a range of social, economic and environmental benefits as follows:

- **Social:** Allowing the site to be utilised, rather than remain vacant and sterile will provide jobs on site, thus increasing the opportunity for people to work locally within LBC in an existing brownfield site.
- **Economic:** The proposed development will significantly contribute to the economic growth of the area as it will allow the site to be utilised, rather than remain vacant as is with the current situation. Allowing the site to be utilised, will provide new jobs and welcome new business to the area, which will in turn result in increased spending in the local economy which will assist in sustaining local services and infrastructure across the wider area.
- **Environmental:** As the proposed development is to provide a new access route into the site, it is considered that no adverse environmental impacts will arise as a result of the proposal. It is proposed to remove one existing tree, however it is proposed to provide two new trees and an additional expanse of landscaping across the site which will contribute towards the environmental quality of the site.

5.4 The proposed development meets the three key requirements which define sustainable development in line with paragraph 8 of the NPPF. It is therefore considered that the application proposals comply with the principle of sustainable development. The site is located within an accessible, central location, on land which is already developed. It therefore in a position where development is encouraged within the London Plan and LBC's Local Plan.

5.5 Policy SP1.3 of the Local Plan acknowledges that growth in homes, jobs and services which constitute sustainable development will be welcomed. It is proposed to provide a new vehicular access to the site from Thornton Road, in order to allow for the site to be independently accessed outside of the boundary of

the cemetery. The site is currently accessed via the cemetery's existing access route off of Thornton Road. Access to Cemetery Lodge is unable to continue as existing and thus requires independent access to prevent the land from becoming sterile. Thus, the proposed development seeks to contribute to sustainable growth of the borough by enabling the site to be utilised.

Impact on Metropolitan Open Land

- 5.6 The site is designated as Metropolitan Open Land (MOL) within the Local Plan Policies Map. London Plan Policy G3 states that MOL is afforded the same status and level of protection as Green Belt. Policy G3 also notes that MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt. Policies SP7 and DM26 of the Local Plan seek to safeguard the extent of the Borough's Metropolitan Open Land, Green Belt and local green spaces. The remainder of Policy DM26 is not applicable to this application as it has regard for extensions to existing buildings.
- 5.7 The Green Belt serves five purposes, set out at paragraph 143 of the NPPF. Criterion (e) is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 5.8 The site is constitutes as previously developed urban land as defined in the NPPF, which as noted above, is in need of a viable future that can only be facilitated through the new access. The development itself will therefore facilitate the recycling of vacant urban land and so positively contributes to this Green Belt purpose. In addition, the development will not conflict or cause harm to any of the other Green Belt purposes.
- 5.9 This is an engineering operation to provide a viable direct, local access to the site that does not conflict within the purposes of including land in the Green Belt, and so, as provide by NPPF paragraph 155, is not inappropriate development in the Green Belt

Spatial impact on the openness

- 5.10 The proposed development does not increase the floorspace or volume of built form across the site. The creation of new entrance gates and piers set back from the road will not result in spatial harm to the MOL. Due to this, it is considered that there would be no impact on the spatial openness of this part of the MOL. Therefore, the proposed development is considered appropriate in the context of the NPPF.

Visual impact on openness

- 5.11 The site is not within any landscape protection areas and lies adjacent to a considerable quantum of built form. As noted above, the proposal does not seek to add any additional floorspace or volume to the site, therefore it is considered that the proposal to provide an additional access would not result in any visual

harm to the openness of this part of the MOL. Therefore, the proposed development is considered appropriate in the context of the NPPF.

- 5.12 Overall the development does not conflict with the purposes of including land in the Green Belt. It does not constitute inappropriate development or result in any material impact on spatial or visual openness. The development is therefore considered acceptable in MOL terms.

Impact on Character and Appearance of the Area

- 5.13 Local Plan Policy DM10 requires new development to respect the pattern, layout, siting, scale, height, massing, appearance, materials and built and natural features of the surrounding area. London Plan Policies D4 and D5 seek to ensure good quality and inclusive design in development. It is important to note that the site does not fall within or adjoin a conservation area. The proposed development seeks to alter the existing boundary wall to provide a new access point. Figure 5.1 below shows the existing boundary wall of the site, with Figure 5.2 outlining the new proposed access route.

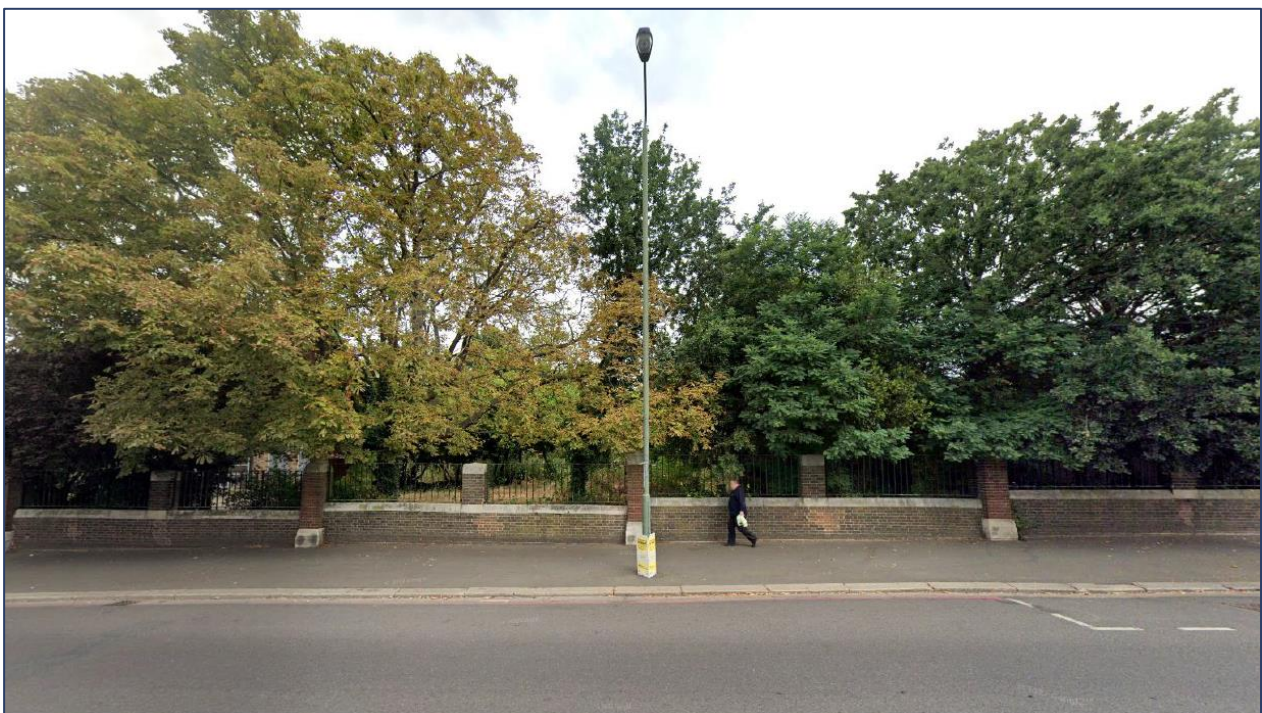


Figure 5.1: Existing Boundary Wall

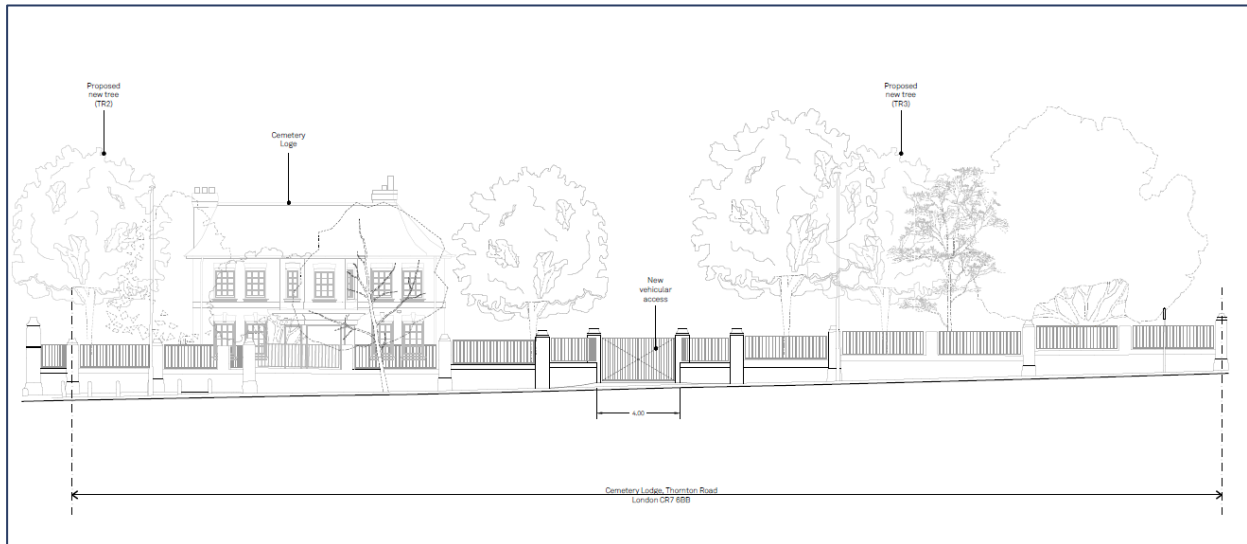


Figure 5.2: Proposed Boundary Wall

- 5.14 The proposed alterations, while visible from street level, aim to introduce a subtle and sensitive addition to the existing frontage of the site. The proposed alterations have been designed so to align with the existing composition of the boundary wall, as well as those found nearby. It is proposed to use the same materials and colour scheme to ensure the alterations will be as subordinate.
- 5.15 The proposed scale and design of the boundary wall are considered to be minor in stature and thus have a neutral effect on the character and appearance of the area. It is therefore considered that the proposed development is in accordance with Local Plan Policy DM10.

Heritage Impact

- 5.16 The site is located within a locally listed historic park and gardens but not within a conservation area. Local Plan Policy DM18.3 seeks to preserve and enhance Listed Buildings, Scheduled Monuments and Registered Parks and Gardens within the borough. DM18.3 also states that all alterations and extensions should enhance the character, features and setting of the building or monument and must not adversely affect the asset's significance.
- 5.17 The proposed development seeks permission for minor amendments to the existing boundary wall to provide new access to the site via Thornton Road. The proposed alterations are considered to represent a subtle and sensitive addition to the existing boundary frontage, which has been designed to respect the design of the existing boundary treatment, thus sitting comfortably within the locally listed historic park and gardens, in line with Policy DM18.3

- 5.18 Policy DM18.7 further notes that substantial weight will be given to conserving and enhancing landscape features or planting that makes a positive contribution to the special historic character and original layout of Registered and Locally Listed Historic Parks and Gardens.
- 5.19 The proposal incorporates a well-considered landscaping scheme which will assist in conserving and enhancing the existing landscape features and planting across the site. The proposed landscaping scheme seeks to positively contribute to the historic character and layout of the locally listed historic park and gardens in line with Policy DM18.7.
- 5.20 The proposal is therefore considered to have no adverse impacts in heritage terms on the locally listed historic park and gardens. It is considered that the proposed changes would result in an improved design solution which would have a net positive impact on both the site and park and gardens, particularly by ensuring that the site will not be rendered sterile. Overall, the proposal is considered to be in-keeping with Policy DM18 of the Local Plan.

Impact on Nature Conservation

- 5.21 Part of the site is located within a site of nature conservation importance. The proposed new access is located outside of the area designated for nature conservation importance, as shown in Figure 5.3 below.

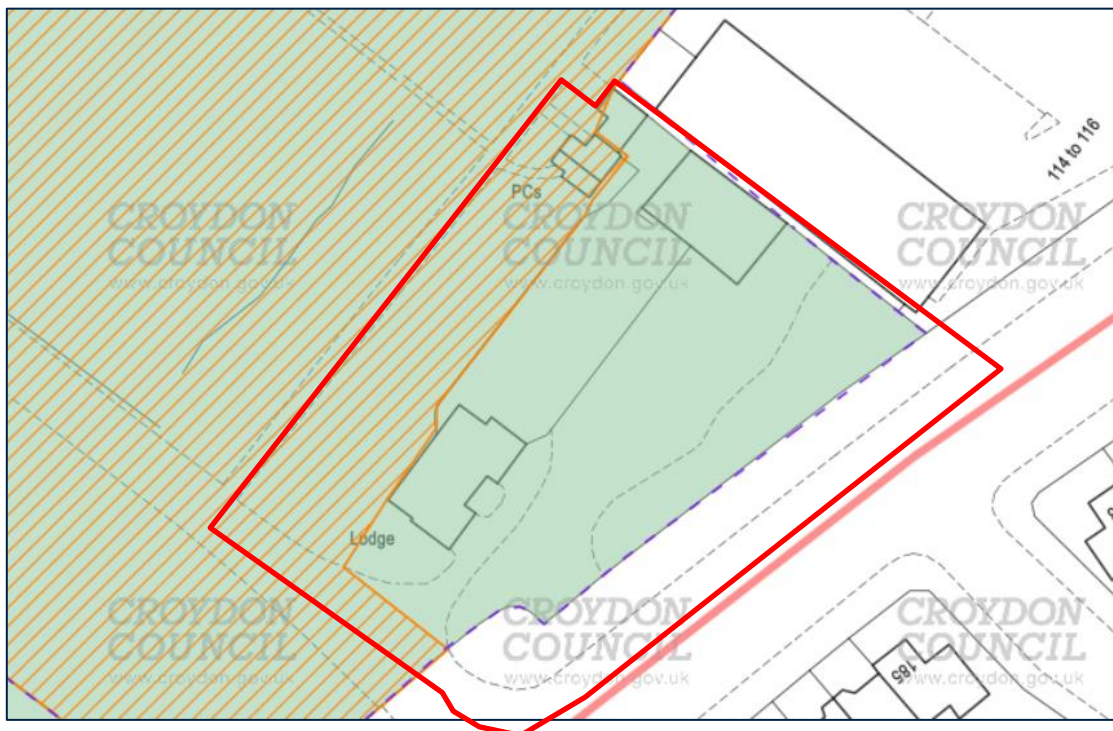


Figure 5.3: LBC's Policy Map (site outlined in red, nature conservation area indicated in orange).

5.22 Local Plan Policy DM27 seeks to protect and enhance biodiversity across the borough. In line with DM27, proposals should have no adverse impact on land with biodiversity value as designated on the Policies Map. As noted above, the proposed access route falls outside of the area designated for nature importance and is therefore considered to have no adverse impact on the adjoining area of nature conservation importance. Additionally, it is proposed to provide additional planting on site, particularly along the western boundary which will only add to the biodiverse quality of the site, in line with Policy DM27.

Impact on Neighbouring Residential Amenity

5.23 With regard to privacy, overlooking, enclosure and daylight and sunlight to existing residents, the application site is not directly overlooked by existing residential properties and due to the type of development proposed, there would be no harm in relation to loss of privacy, overlooking, reduced sense of enclosure or loss of daylight and sunlight to the existing residential properties. The proposal is therefore in accordance with Policy DM10 which seeks to protect residential amenity.

Transportation and Highways

5.24 Chapter 9 of the NPPF considers transport related matters and places an emphasis on sustainable transport. Paragraph 114 sets out that in assessing sites for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

5.25 Paragraph 115 advises that development should only be refused on highways grounds if there would be unacceptable impacts on highway safety, or if cumulative impacts would be severe. In promoting sustainable transport, the NPPF (paragraph 116) encourages applications to prioritise pedestrian and cycle movements, facilitate access to higher quality public transport networks and provide facilities that encourage public transport use. Together with ensuring layouts create places that are safe, secure and

attractive to minimise highway conflicts, address the needs of people with disabilities and reduced mobility, policy also seeks to allow for the efficient delivery of servicing and promotion of the use of green vehicles.

- 5.26 Local Plan Policy DM29 requires development to not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles. London Plan Policies T1 and T4 seek to mitigate any impacts upon London's transport networks and ensure that there is no increase in road danger.

Access

- 5.27 The site is directly accessed via Thornton Road, the proposed development seeks to provide a new entrance to serve the site, which falls outside of the boundary of the locally listed historic park and garden. This application is supported by a Transport Statement which has been prepared by Transport Planning Associates. This Statement also includes access drawings and a swept-path analysis which outlines the proposed strategy for the site.
- 5.28 It is a policy of LBC for there to be only one vehicle access per property to minimise the number of vehicle accesses to ensure that conflicts with other highway users such as pedestrians and cyclists are minimised. This has been regarded for throughout the development of this proposal, and in line with the Inspector's comments under Appeal Ref. APP/L5240/D/22/3313565. As noted above, this site no longer has the right to use the existing access route via the cemetery. It is therefore proposed to provide a new entrance and to close off the existing route into the site via the provision of a new tree and associated landscaping. Cemetery Lodge will therefore only have one access route in and out of the site in line with LBC's 'Vehicle Crossovers' Document and the Appeal Decision noted above. Without the provision of new access, the site will be rendered inaccessible and sterile.
- 5.29 The site fronts onto the A23 which is a TfL red route. This road is subject to a 30mph speed limit. In terms of pedestrian and cycle access, the existing footway adjoining the site is of good condition and provides safe pedestrian access to the site. There are no TfL or national cycle routes within the local vicinity of the site. Thornton Road is however subject to a 30mph speed limit, well lit, and wide, thus being conducive to safe cycling. Nearby residential roads are limited to 20mph, providing a more conducive environment for cyclists. With regards to public transport, the site has a PTAL score of 2 which indicates poor/moderate level of accessibility to the site by public transport. However, there are several bus stops within close proximity to the site, with the closest being 50m north of the site along Thornton Road.
- 5.30 The proposed access route will take the form of a vehicle crossover, measuring 4.0m in width at the point of entry to the carriageway with 0.5m wide ramps either side, in accordance with design guidance set out by LBC. Pedestrian visibility splays of 1.5m x 1.5m can be achieved either side of the access as per the aforementioned guidance. The access provides sufficient spacing with the junction between Thornton

Road and Keston Road opposite the site, in accordance with TfL requirements, which prescribes a 10m spacing to the nearest junction on safety grounds. Additionally, visibility splays for vehicles travelling at 30mph is 2.4 m x 43 m, based upon Manual for Streets guidance. Such splays are achievable from the site access.

- 5.31 In order to minimise the probability of vehicles waiting on the carriageway to enter the site, the gated access will be an automatic gate system meaning the gate will open when an authorised vehicle arrives at the access.

Refuse and Servicing

- 5.32 Access for deliveries and servicing vehicles is expected to continue operating in the same manner as existing, notably with minimal servicing requirements, and via the new access if required. For the purpose of this assessment, a swept path analysis for a delivery vehicle entering and exiting the site in forward gear is visible at Appendix C of the Transport Statement.
- 5.33 In terms of refuse collection, this would be carried out in a similar manner to the existing arrangement whereby bins are wheeled to the edge of the carriageway for collection on-street. With the creation of the new crossover, bins could be placed adjacent to the access for collection day.
- 5.34 A swept path drawing of a typical delivery vehicle servicing from the front of the building is provided within the Transport Statement.
- 5.35 In terms of emergency access, access for fire tender will also be via Thornton Road. Emergency Vehicles will be able to stop outside the site and utilise the parking bays adjacent to the site if required.
- 5.36 On the basis of the findings within the Transport Statement, and in the context of the guidelines within NPPF and local planning policy, it is considered that there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding transport network.

Trees and Landscaping

- 5.37 Local Plan Policy DM28 seeks to protect trees by not permitting development which results in the avoidable loss or excessive pruning of preserved trees, or trees which make a contribution to the character of the area. It is important to note that there are no protected trees within the site boundary. Additionally, this application is accompanied by an Arboricultural Implications Report (AIR) prepared by SJA Trees. A Tree Protection Plan (TPP) is included under Appendix 4 of the AIR.

- 5.38 It is proposed to remove three individual trees, either because they are situated within the footprints of proposed structures or surfaces, or because they are too close to these to enable them to be retained
- 5.39 The submitted TPP identifies the trees to be removed to accommodate the proposed development, either because they are situated within the footprints of proposed structures or surfaces, or because in our judgment they are too close to these structures or surfaces to enable them to be retained. With the exception of the horse chestnut, the trees that constitute the main arboricultural features of the site and which make the greatest contribution to the character and appearance of the local landscape, to amenity or to biodiversity, will be retained. However, for reasons outlined above and to avoid the sterilisation of the site, its removal is essential. The AIR further outlines why the removal of this tree is necessary.
- 5.40 To compensate for the removal of the horse chestnut there is scope to plant at least two new trees on the site. This is goal of the London Plan and is considered to represent a significant gain of the proposed development. The intention is for the replacement trees is be planted either side of the new access which would also act as a gateway feature into the site. A further, large growing specimen could be planted on the site's western boundary where the existing access would be closed up and reinstated as soft landscaping.
- 5.41 The AIR concludes that the arboricultural impact of the proposed development is of low magnitude and is in accordance with national, regional and local planning policies.

Planning Balance

- 5.42 The development is considered to accord with the Development Plan as a whole. Should, however LBC disagree, and consider harm to result, then in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the decision-taker must weigh up all of the benefits and harm resulting from a proposal, with reference to all the relevant policies of the development plan, and then come to a balanced view on whether planning permission should be granted or refused.
- 5.43 In any balancing exercise undertaken the benefits of the proposed development represent important material considerations which weigh heavily in favour of the application. These include:
- The proposed development would enable the site to be utilised rather than being rendered sterile as a result of access arrangements.
 - Financial benefits for the local economy, including the creation of new jobs by allowing access to the site to be reinstated.
 - Provision of new trees and landscaping across the site.

Planning Statement

Cemetery Lodge, Thornton Road, Croydon, CR7 6BB



- 5.44 The site requires a viable future and without new access, the site will be sterilised due to the inability to use the current access arrangement. The site constitutes previously developed land which has been in separate use to the cemetery grounds. The NPPF encourages the use of PDL sites to enable optimal development, therefore access to the site must be established to ensure the site can provide a future beneficial use to the local area.
- 5.45 The proposed development includes new planting and landscaping, will not harm the openness of the MOL and maintains appropriate visual aspect onto Thornton Road. No harm is considered to result as part of the proposal, however if harm is perceived, this is considered to be negligible, particularly within the context of the benefits of securing a future for the site. The planning balance is thus considered to be strongly in favour of this viable and deliverable proposal being granted planning permission.
- 5.46 NNPF policies on the delivery of sustainable development carry significant weight, and Local Plan Policies do not indicate that development as proposed at the site should be restricted. Additionally, there are no technical or environmental impacts which would significantly or demonstrably outweigh the substantial benefits of the proposal.
- 5.47 In accordance with paragraph 11 of the NPPF, the proposed development clearly constitutes 'sustainable development'. It is respectfully requested that this application is approved without delay.

6. Conclusions

- 6.1. This Planning Statement has been prepared in support of an application for full planning permission submitted to the London Borough of Croydon by the London Borough of Croydon for the proposed development at Cemetery Lodge, Thornton Road, Croydon, CR7 6BB.
- 6.2. This application seeks full planning permission for the following:

“Creation of new vehicular access to Cemetery Lodge from Thornton Road, including alterations to the boundary wall, insertion of new vehicular access gates and associated landscaping.”
- 6.3. This application proposes to create new vehicular access to the site from Thornton Road, to provide the site with a standalone entrance. In order to facilitate the new access route, it is proposed to alter the existing boundary wall to provide gated access.
- 6.4. Overall, a minor alteration to the access route is proposed which is essential for the sites continued beneficial use and associated economic and social benefits to the local area.
- 6.5. As outlined under Section 5, there no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal. In accordance with paragraph 11 of the NPPF the development proposal clearly constitutes ‘sustainable development’.
- 6.6. In summary, it is therefore concluded that there are significant benefits to the application which are considered to outweigh any potential harm that may arise from the proposed development. It is respectfully requested that the application should be approved without delay.