

PLANNING STATEMENT

Erection of Retirement Living Housing



Land at Oakfield, Sale

November 2022



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APPENDIX F: A Better Life: Private Sheltered Housing and Independent Living for Older People by The Opinion Research Business.

APPENDIX G: Local Area Economic Impact Assessment by the Institute of Public Care (March 2014)



Executive Summary

The Planning Statement is prepared in support of a full planning application for the creation of a Retirement Living housing development comprising 25 Retirement Living Apartments (Category II type accommodation), associated communal facilities, landscaping and car parking.

This Planning Statement sets out the planning policy considerations which support the provision of Retirement Living accommodation for older people on the application site. The development will ensure that residents maintain their independence via a range of communal facilities and a House Manager, allowing them to remain in their own home as frailty increases through later life. These are a very specialised forms of accommodation that are currently limited within Sale the development of which promotes downsizing and more efficient use of the existing housing stock.

The proposal provides the opportunity to achieve a high quality development that would positively contribute to meeting demonstrable local housing needs in accordance with the National Planning Policy Framework as well as the Council's local plan and both its Housing Strategy and Older Peoples' Housing Strategy.

In short, this scheme provides numerous wide ranging social and planning benefits, both for potential residents and the community as a whole. In summary, these are:

Sustainability Benefits

- *The provision of much-needed accommodation for older people that helps address the demographic imperative of an ageing population and a housing stock that is ill equipped to deal with its needs.*

- *An accessible location and form of development that will lead to less reliance on the private motorcar.*
- *A development that serves to underpin local facilities, including the retail functions of the shops close to the site.*
- *A land use, which is entirely passive and a "good neighbour".*
- *A Retirement Living building that provides substantial energy efficiency advantages over most open market schemes.*

Balanced View of Policy and Other Material Considerations

- *Specialised housing for older people provides significant planning and social benefits.*
- *Sustainable form of development.*
- *Optimises use of scarce previously developed land.*
- *Net environmental benefit in streetscene, character and landscape terms.*
- *Reduced demand on public sector resources and health services. Residents manage better and spend fewer nights in hospital, reducing the impact on NHS resources.*
- *Most residents have family and friends in the locality and are able to remain an important part of the local community.*
- *Increases availability of much needed family housing in areas of shortage boosting the supply in the local housing market.*
- *Helps underpin local facilities.*



Executive Summary

This proposal represents an ideal opportunity for the redevelopment of this sustainably located site at Oakfield, Sale in accordance with the Government's housing and sustainable development policies. It would provide for much needed specialised accommodation for older people within a sustainable location, freeing up existing under-occupied stock.

This specialised form of accommodation also provides older people with a better housing choice, and provides residents with safety, security and companionship whilst removing the heavy burden of property maintenance. Therefore reducing the anxieties and worries experienced by many older people living in accommodation that does not best suit their needs.

This proposal is located in an accessible location with good links to Sale town centre and is within easy reach of the shops, public transport facilities and other essential services located therein as well as local amenities, which all benefit residents in maintaining an independent lifestyle. This specialised form of housing generates extremely low levels of traffic; and the convenience of the location close to public transport opportunities would further reduce the need for car use, not least because purchasers of such housing accommodation generally no longer need or wish to have the 'burden' of car ownership (please see the Transport Statement submitted alongside this planning application).

The proposed development successfully achieves a balance between the potentially competing objectives of development and the environment, and thereby satisfies the goal of "sustainability".

This proposal will:

- Accord with national planning guidance in relation to sustainable development and meeting local housing needs;

- Accord with the relevant and material provisions of the development plan including its housing objectives;
- Optimise the use of previously developed land;
- Achieve a high quality design that will enhance both the character and appearance of the local area; and
- Respond positively to the character of the area.



Above: Example of McCarthy Stone development at Speakman Court, Altrincham



McCarthy Stone was established in 1963. Since 1977 and thus for the past 45 years the Company has specialised in the design, construction and management of Retirement Living housing (also known as sheltered accommodation) for sale to older people, and has developed a wealth of experience in this particular sector of the housing market. Extensive research both at pre and post-occupation has been carried out by the Company, which has led to product and service development.

This background has resulted in McCarthy Stone being widely recognised as the market leader in the provision of Retirement Living housing for sale to older people. To date more than 58,000 specialised dwellings for older people have been built or are in the course of construction at over 1,300 McCarthy Stone development sites throughout the United Kingdom, including a number of schemes within Trafford including Michael Court which lies immediately to the north on Oakfield. As a result, McCarthy Stone has considerable experience of successfully developing a wide variety of sites including town centre locations, infill sites, sites within conservation areas and those adjacent to Listed Buildings.

McCarthy Stone's ethos is that later life can be more fulfilling. Through its developments and services, it helps older people enjoy their lives in peace, comfort and security. In addition to new developments, the Company provides its own care, support and management services. This ensures a continuing relationship and commitment to all of its residents.

McCarthy Stone continues to win the highest awards possible for customer satisfaction. Independent surveys by the Home Builders Federation (HBF) show that it is the only retirement house builder to achieve a double five star rating for customer service, and it has done so for sixteen consecutive years.



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Nature and Concept of Retirement Living Housing

Retirement Living is a proven option for older people who wish to move into accommodation that provides comfort, security and the ability to manage independently to a greater extent. It enables older people to remain living in the community and out of institutions whilst enjoying peace of mind and receiving the care and support that they need.

All McCarthy Stone developments are specifically designed to provide specialised housing accommodation for older people, with communal facilities and specific features within the apartments tailored to meet the particular needs of older people. Since 2010 McCarthy Stone now manage their own developments and a House Manager is based on-site, supported by the Company's management services team. This allows for the maintenance and management of the development and its grounds to be kept in line with best practice and all legal lease management requirements that apply.

While anyone may purchase an apartment, the apartments are sold on the basis of a 999 year lease requiring the accommodation, with the exception of the House Manager's office accommodation, to be occupied by persons over 60 years. In the case of a couple, that part of the lease shall be satisfied where one of the occupants is over the age of 60 years and the other is over the age of 55 years.

This is a reasonable and caring approach to the limitation on the occupancy of retirement living housing in that it recognises and allows for those exceptional cases where a spouse, who is in need of special accommodation, has a younger partner.



Above: Example of a guest suite and an example of organised activities, which are a feature of a McCarthy Stone development



Such occurrences are, in any event, found to be extremely rare as between 60-70% of occupants are aged 78 years or over with about 30% aged 80 years or above. The vast majority of McCarthy Stone residents (some 85-90%) are widowed or single, with 75% of apartments comprising of single, female households.

The accommodation includes a range of communal facilities that are also tailored to meet the needs of the residents, including:

- **a residents' lounge;** this comprises the heart of the community and is centrally located close to activity either on or off site (e.g. the car park). It is decorated to the highest standards and is designed to have the atmosphere of a high quality hotel lobby.
- **internal refuse room;** this allows the residents to dispose of waste without leaving the building, and avoids the need for unsightly external bin stores.
- **battery car charging store;** this can store and charge larger mobility vehicles. Lifts/corridors are designed to facilitate the width of these scooters.
- **lift;**
- **secure entrance lobby with CCTV link to individual apartments;**
- **House Manger's Office;**
- **emergency help line available within each residents' apartment and**



communal areas to summon assistance in the event of an emergency; and

- **Gardens;** these are an important element in the design of Retirement Living accommodation and will comprise well landscaped gardens, with sitting out areas for the residents' enjoyment.



Above: Typical McCarthy Stone apartments bedroom and lounge.



3 Planning and Social Benefits of Retirement Living Housing for Older People

Recently a growing number of reports have been published that promote the strategic need to provide more and better housing for those in later life as well as the benefits that specialist accommodation for older persons delivers. These reports have been published by a variety of organisations including the private sector, academic institutions, charities and numerous Government bodies at national and local level. The following seven reports are of particular relevance and an executive summary for each is appended to this document:

- *Ready for Ageing?* compiled by the House of Lords - Select Committee on Public Service and Demographic Change (Appendix A) - The report warns that the Government and our society are woefully under-prepared for ageing. The Committee says that longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boom could turn into a series of miserable crises. The report covers a broad range of policy areas, providing a comprehensive analysis of the potential impact of an ageing population on public services.

The report states that *'the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people'*.

Additionally, the report highlights that *'there are just 106,000 units of specialist housing for home ownership and 400,000 units for rent in the UK*

as a whole. Build rates are lower now than in the 1980s. In 2010, just 6,000 units for rent and 1,000 for ownership were built, whereas in 1989, 17,500 units for rent were built as well as 13,000 for ownership'.

<http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

- *Top of the Ladder* compiled by Demos (Appendix B) - This report uses original quantitative research to investigate older people's housing preferences, and the likely impact of giving them greater choice. It estimates that if all those interested in buying retirement property were able to do so, 3.5 million older people would be able to move, freeing up 3.29 million properties. Apart from these gains, retirement housing has a very beneficial effect on older people's health, wellbeing and social networks, and could save health and care services considerable resources.

<http://www.demos.co.uk/projects/topoftheladder>

- *Identifying the Health Gain from Retirement Housing* by the Institute of Public Care (Appendix C) - The paper highlights that increased companionship and security, better access to care and warmer, more accessible accommodation through the development of good quality retirement housing could reduce the need for health care expenditure.

<http://ipc.brookes.ac.uk/publications/index.php?absid=71>



3 Planning and Social Benefits of Retirement Living Housing for Older People

- *Creating Housing Choices for an Ageing Population* by Shelter (Appendix D) - This report takes a detailed look at the current state of housing for the older people's market and considers whether there is a wide choice of housing for an ageing population and if there is any scope to stimulate a greater supply.

http://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/policy_library_folder/a_better_fit_creating_housing_choices_for_an_ageing_population

- *Housing Markets and Independence in Old Age: Expanding the Opportunities* by Professor Michael Ball of Reading University (Appendix E) - This report highlights a number of simple policy changes needed to stimulate the delivery of owner occupied retirement housing.

<http://www.reading.ac.uk/news-and-events/releases/PR364822.aspx>

- *A Better Life: Private Sheltered Housing and Independent Living for Older People* by The Opinion Research Business (ORB) (Appendix F) - This sets out the findings of one of the largest studies of sheltered housing in the UK.

<http://www.mccarthyandstone.co.uk/documents/research%20and%20policy/orb2.pdf>

- *Local Area Economic Impact Assessment* by the Institute of Public Care (March 2014). This report (Appendix G) takes a detailed look at the economic benefits of sheltered housing developments on the local economy.

http://ipc.brookes.ac.uk/publications/pdf/Final_McCarthy_and_Stone_EIA_report_-_March_2014.pdf

These reports detail that Retirement Living housing provides a valuable form of specialised accommodation that meets a specific housing need. In so doing, it gives rise to significant planning and social benefits that realise other planning objectives given national and regional priority. Insofar as local and wider planning benefits are concerned, Retirement Living housing contributes the following:

Community

- Freeing up housing: Specialist housing helps to free up much-needed and under-occupied family homes in the local area, thereby making better use of existing housing stock. An average scheme of 45 apartments frees up housing **worth nearly £7.5 million**.
- Community spending: McCarthy & Stone's developments contribute to the vitality and viability of the local area as its residents typically do their shopping within a one mile radius. 80% use local shops almost daily or often and over 40% use the local library or post office frequently. Residents are estimated to have a 'community spend' of more than **£6 million** over a development lifetime period.

Economic benefits

- Investment during construction: An average development represents an investment of around **£3.6 million** into the local economy.
- Local jobs: Around 60 local companies are employed during construction, thus supporting local jobs. Additional job opportunities are created when the scheme opens.



3 Planning and Social Benefits of Retirement Living Housing for Older People

- New Homes Bonus: Through this Government initiative to encourage new development, each local authority will receive around **£378,000** per every 45 new homes (McCarthy and Stone's typical development size) that are built in the local area. This is money it can spend as it deems fit.

Improved health

- Streamlined health and social care provision: Residents in specialist housing have fewer visits to local health professionals and find it easier to return home after stays in hospital.
- Older people account for 55% of GP appointments, 68% of outpatient appointments and 77% of inpatient bed stays. As well as achieving better outcomes, specialist housing reduces demand for these acute health and care services by supporting people to live independently and avoiding crisis intervention. Research shows that each year a resident postpones moving into public care by living in market accommodation, the local authority saves on average £30,000.
- Health and social care provision can be streamlined within specialist housing. Visiting health professionals including doctors, nurses, chiropodists and so forth can visit several residents during one visit, which is a more efficient use of public resources.

Increased well-being

- Increased wellbeing: 64% of McCarthy & Stone's residents said their health and well-being had improved since moving into the scheme.
- A higher quality of life: 92% said they were very happy or contented.
- Increased independence: 83% believed they maintained their independence for longer.

Retirement Living housing provides purpose-built, specifically designed, small units of accommodation for local older people, which:

- addresses an acknowledged and specific housing need;
- addresses an existing housing "mismatch", by releasing presently under-occupied housing and thus plays an important role in the recycling of stock in general;
- has a knock-on effect in terms of the recycling of the whole housing chain – Retirement Living housing being at the "back-end" of the chain;
- optimises the use of sustainably located land within the Springfield Gardens area; and
- provides energy efficient construction and living, through shared wall construction, cross-flow ventilation and shared heating facilities.

In addition to the above benefits, the Executive Summaries of four more reports that highlight the benefits of the specialised retirement living accommodation that is proposed at this Springfield Gardens site are included within the application documents. These reports are based upon independent studies carried out by WPI Strategy for the Homes for Later Living Group. The three reports are relatively recent and were prepared between September 2019 and April 2022. The reports are entitled:

"Healthier and Happier" - An analysis of the fiscal and wellbeing benefits of building more homes for later living (September 2019);

"Chain Reaction" - The positive impact of specialist retirement housing on the generational divide and first time buyers (August 2020); and

"Silver Saviours for the High Street" - How new Retirement properties create more local economic value and more local jobs than any other type of



3 Planning and Social Benefits of Retirement Living Housing for Older People

residential housing (February 2021).

“Sustainable Living” - How the ‘downsizing dividend’ can deliver a greener housing future (April 2022).

Authored by a former government economist within the DCLG, these reports find:

“Healthier and Happier” principally focussing on health and social care benefits and the savings delivered:

Each person living in housing specifically designed for later life enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of c.£3,500 per year.

Those in specialist housing are half as likely to have falls with resulting fractures, injuries and costly inpatient bed stays.

Building 30,000 more retirement housing dwellings every year for the next 10 years, which is the estimated demand, would generate fiscal savings across the NHS and social services of £2.1 billion annually.

Based on a selection of established national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.

Whilst by nature, a fiscal report, its positive findings arise from improved safety, security, health and well being for older people associated with a move to retirement housing.

“Chain Reaction” principally exploring benefits to the housing chain and helping first time buyers join the housing ladder:

c.3 million people in the UK over the age of 65 (or 25%) want to downsize.

90 per cent of projected household growth in the coming decades is set to be

amongst those aged 65 and over, taking the total number of homes owned by those aged 65 and over from 3.9 million today to at least five million by 2030.

If all the homeowners over the age of 65 in England who wanted to move were able to do so, they would directly release one million properties back onto the market and free up two million spare bedrooms.

For every retirement property sold generates at least two moves further down the housing chain. This frees up homes at differing stages of the housing ladder for different demographics. A typical Homes for Later Living development which consists of 40 apartments therefore results in 80 additional moves further down the chain.

Roughly two in every three retirement properties built releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

“Silver Saviours for the High Street” “focussing on job creation and impact on the high street:

Retirement housing creates more local economic value and more local jobs than any other type of residential development.

People living in each retirement development generate £550,000 of spending per year, £347,000 of which is spent on the local high street. Some £225,000 of this is new spending in the local authority, directly contributing to keeping local shops open.

For just one retirement development of roughly 45 units, a local authority could expect to see benefits of 85 construction jobs for the duration of the build, as well as six permanent jobs and £13m in GVA over the lifetime of the development, as opposed to not developing a site.



3 Planning and Social Benefits of Retirement Living Housing for Older People

“Sustainable living” focussing on the impact on the environment of specialist retirement housing compared to other developments.

Each new build McCarthy Stone apartment could save over 1 tonne of CO2 each year through reduced energy loss in a ‘downsizing dividend’.

Older people moving into a McCarthy Stone apartment create a ‘home improvement dividend’ as younger homeowners move into the freed up family homes and make energy efficiency improvements.

Residents of specialist retirement housing are also less likely to drive and it is estimated that building 45 specialist retirement housing properties could take up to 15 cars off the roads.

Adding the various savings together, building a new McCarthy Stone apartment instead of a standard new build house could save nearly 2 tonnes a year in CO2 emissions.

Taking these savings together, in line with recognised estimates of demand, were the UK to build 30,000 retirement living properties - ie 10% of the new homes per year target - annually, instead of 30,000 new standard houses, our analysis suggests that we could prevent nearly 60,000 tonnes of carbon dioxide a year being released into the atmosphere.

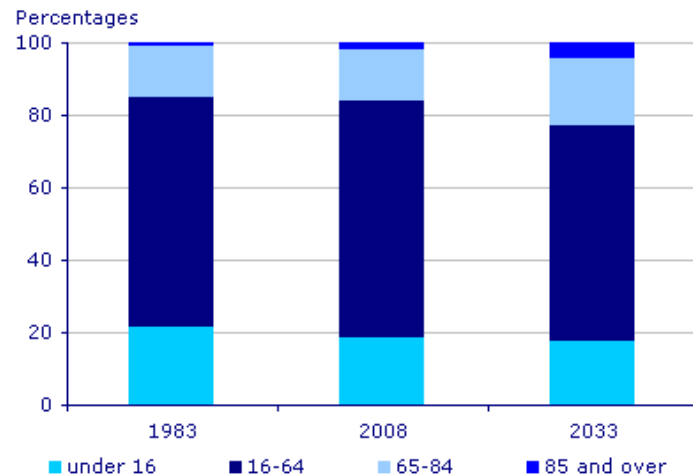


4

The Need for Retirement Living Housing

The proposed development of the Retirement Living Housing for older people provides a significant opportunity to contribute towards meeting the current and projected requirements for special needs accommodation for older people in Sale, the Borough of Trafford and the UK generally. The following table and supporting text from mid-year population estimates, Office for National Statistics, shows the estimated increase in older people.

Ageing Fastest Increase in the 'oldest old'



Above: Population by age, UK, 1983, 2008 and 2033

“The population of the UK is ageing. Over the last 25 years the percentage of the population aged 65 and over increased from 15 per cent in 1983 to 16 per cent in 2008, an increase of 1.5 million people in this age group [in real terms]. Over the same period, the percentage of the population aged 16 and under decreased from 21 per cent to 19 per cent. This trend is projected to continue. By 2033, 23 per

cent of the population will be aged 65 and over compared to 18 per cent aged 16 or younger.

The fastest population increase has been in the number of those aged 85 and over, the 'oldest old'. In 1983, there were just over 600,000 people in the UK aged 85 and over. Since then the numbers have more than doubled reaching 1.3 million in 2008. By 2033 the number of people aged 85 and over is projected to more than double again to reach 3.2 million, and to account for 5 per cent of the total population” (Mid-year population estimates, Office for National Statistics).

The Council’s Trafford Housing Strategy 2018—2033 acknowledges at paragraph 2.3.3 that, *“Trafford has a growing older population. In the next 20 years there will be 73,600 people over the age of 60, this compares with 51,600 in 2015. There will be an additional 10,700 people over the age of 75. It also has high levels of under-occupation as older people continue living in their family homes into their old age. Continuing to live in a home that is larger than required into old age is not ideal; it can lead to social isolation and loneliness, daily chores become too onerous, heating bills for a large home are too high”.*

The Council’s Trafford Older Peoples’ Housing Strategy 2020-2025 (TOPHS) confirms that the majority of older people in Trafford are homeowners with 76.5% of households headed by a person aged 65 years and older were owner occupied; which is comparably higher than the England and Wales (74.3%) and Great Manchester (69.1%) figures (2011 Census figures).

TOPHS goes on to set out the following our strategic priorities following a review of policy and stakeholder consultation:



1. Improve the quality and standard of existing housing for older people in Trafford.
2. Increase the availability and range of suitable housing options for older people within Trafford.
3. Enable older people in Trafford to live independently.
4. Create and foster partnerships that work to deliver effective health and social care provision, support services and high quality housing to older people across Trafford.

In terms of the need to increase housing options for older people, page 18 of the TOPHS states, *“there is clear need for more older peoples’ housing in Trafford to meet current and future demand. There is a very limited stock available of older peoples’ accommodation in the borough, which has low turnover rates and quick sales/lets. The increasing life expectancy among Trafford residents will also mean more specialist forms of housing (and care) for older people will be particularly required, and these developments will ideally be made available across the borough so that people can maintain social and family connection in familiar neighbourhoods.*

Predictive modelling figures for Trafford show a significant shortfall of retirement housing, and housing with care units, to meet future need without intervention. There is a predicted shortfall of 1,043 units without growth in the borough’s current stock for sheltered / retirement housing, and a shortfall of 836 housing with care units by 203518 .

The lack of older person housing options and stock is resulting in older people staying in unsuitable properties for longer; often until a crisis forces them to move to what is available, but which may still not be fully suitable to their individual needs. The changing aspirations of what older people want from their homes must be considered if the Strategy is to be a success” (emphasis added).

This planning application is supported by a report by Three Dragons that assesses the need/demand for the proposed retirement living scheme. The report sets out the following findings at paragraph 3.22:

“We have appraised potential demand for specialist retirement housing using two alternative models, one of which is driven by the scale of potential need from persons who would potentially benefit from a move to specialised housing, the other looking at propensity to move by age group.

- *The RHG model suggests a need for 701 units of sheltered housing and 429 units of Extra Care housing for sale or shared equity.*
- *The Contact Consulting model points to a need for 1,141 units of sheltered housing and 633 units of enhanced sheltered and Extra Care housing for sale or shared equity using the current tenure split for Trafford.*
- *At ward level the RHG model indicates a need for 149 sheltered and 121 Extra Care units for sale or shared equity. The Contact Consulting model indicates a need for 259 sheltered and 172 units of enhanced sheltered and Extra Care units for sale or shared equity.”*



4

The Need for Retirement Living Housing

The proposed Retirement Living Housing will provide modern, purpose built accommodation, in keeping with the current needs and aspirations of elderly persons. The proposed development will provide specialist accommodation for the elderly, therefore helping to diversify housing options available for older persons within Sale in keeping with the findings of the Council's Housing Strategy and Older Peoples' Housing Strategy.



5

The Locational Characteristics of this Site

The site is a suitable location for a Retirement Living development, located approximately 450 metres walk away from Sale town centre and its comprehensive range of associated shops and services.

The site is also easily accessible via public transport with bus routes on Washway Road around 350m away from the application site providing services to Altrincham, Ashton-on-Mersey, Eccles, The Trafford Centre, Lostock, Flixton, Northern Moor and Manchester City Centre.

Sale Metrolink station is located approximately a 1km walk to the east and this provides services to Altrincham, Manchester city centre and connections to the wider light and heavy rail networks.

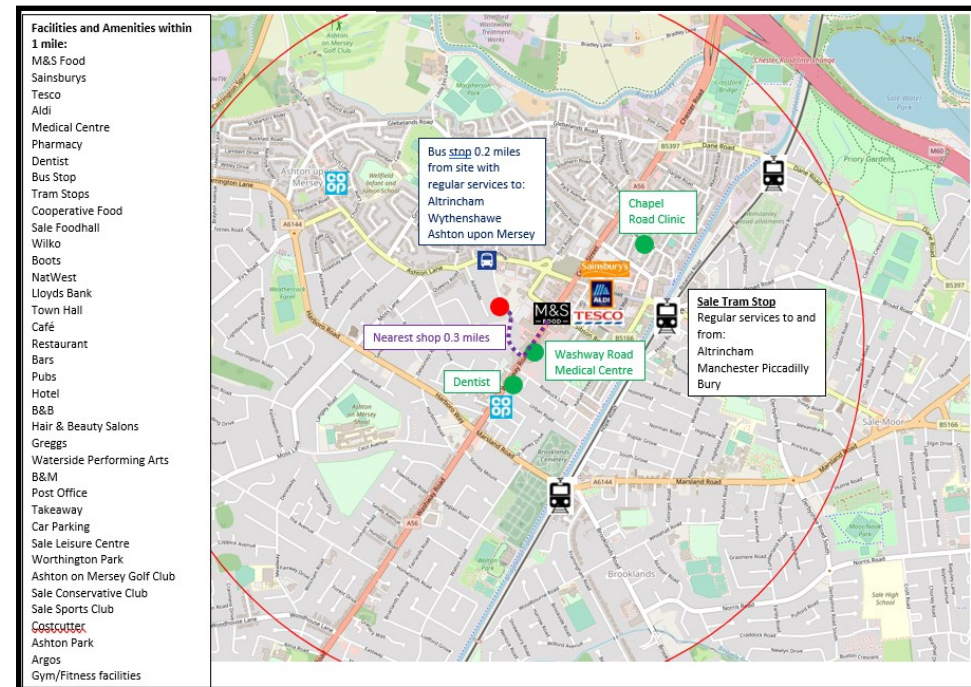
In selecting sites for older persons' accommodation, McCarthy & Stone take full account of the locational criteria recommended in the Joint Advisory Note of the National House Builders' Federation and the National Housing and Town Planning Council entitled - "Sheltered Housing for Sale" (2nd Edition - 1988).

The five locational criteria identified are:-

- (i) Topography
- (ii) Environment (including safety and security)
- (iii) Mobility
- (iv) Services
- (v) Community Facilities

The NHBF/NHTPC Advisory Note acknowledges that the ideal site for sheltered housing is difficult to find. However, the site that is the subject of this application is eminently suited to a use such as Retirement Living housing and is well

situated to serve the needs of local elderly persons who will occupy such a development.



The site and surrounding local amenities.



Proposal

The proposed development comprises of a total of 25 (14 one bedroom and 11 two bedroom) Retirement Living apartments for sale to older people. The proposal will feature a House Manager's office alongside communal facilities such as a residents' lounge, CCTV entry system, pavement car store/charging points, guest suite and Careline alarm facility, as detailed in Chapter 3. McCarthy Stone's management company maintain the grounds and fabric of all its developments following construction, thus safeguarding the interests of the owners and the local community.



Above: Proposed Site Plan

Right: Proposed Elevations



Site Description and Planning History

Site Description

The site is broadly rectangular in shape, and extends to approximately 0.23 hectares. It is currently occupied by a three-storey plus basement, detached Victorian building with painted and rendered brick elevations and vertical tiled elements set beneath a pitched tiled roof together with a separate two-storey annex building of brick construction set beneath a pitched tiled roof.

Internally the building provides a total of 14 flats with six studios, seven one-bedroom flats and a two bedroom flat. The main building provides two one-bedroom flats and a studio on the ground-floor and first-floors and a large one bedroom flat on the second-floor. There is a one bedroom flat on the lower ground floor and a one bedroom duplex flat across the lower ground and ground floors. The annex provides for three studio flats on the ground floor and a studio and two-bedroom flat on the first floor.

Externally there is a single storey garage with side extension providing storage space. There is shared parking and communal gardens which are laid to grass. There are mature trees to the site's frontage and some low quality trees to the rear.

Site Planning History

There have not been any recent relevant planning applications relating to the site's redevelopment. The site has been subject to the applications listed below:

H00212 — CHANGE OF USE FROM RESIDENTIAL TO HOTEL & ERECTION OF 3-STOREY HOTEL EXTENSION LINKED TO EXISTING BUILDING AT GROUND FLOOR LEVEL (TOTAL OF 20 BED SPACES, APPLICANT'S LIVING ACCOMMODATION).

Approved 8th August, 1974.

H10811 — ERECTION OF 2-STOREY EXTENSION TO FORM 5 NO. SERVICE SUITES, 2 NO. GUEST BEDROOMS AND LOUNGE

Refused 14th February, 1980.

H11922 — ERECTION OF EXTENSION TO FORM 2-STOREY APARTMENT SUITES (6 UNITS), GROUND FLOOR LOUNGE AND COVERED WAY

Approved 10th April, 1980.

H/58317 - DEMOLITION OF EXISTING OUTBUILDING AND ERECTION OF A TWO STOREY REAR EXTENSION (INCLUDING ACCOMMODATION IN A SEMI-BASEMENT) TO FORM 10 SERVICE APARTMENTS. ERECTION OF A DETACHED BUILDING WITH FIRST FLOOR BRIDGE LINK TO FORM MAINTAINENCE AND STORES ON THE GROUND FLOOR WITH AN OFFICE OVER. PROVISION OF 10 ADDITIONAL CAR PARKING SPACES.

Approved 19th March, 2004.



National Planning Policy Framework

The National Planning Policy Framework (NPPF) was first published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. The NPPF sets out the Government's planning policies for England and how these are expected to be applied, and must be taken into account as a material consideration in planning decisions in accordance with Section 38 of The Act 2004.

Achieving sustainable development

The purpose of the planning system is to contribute to the achievement of sustainable development. **Paragraph 8** of NPPF outlines that achieving sustainable development means that the planning system has three overarching objectives, requiring the planning system to perform economic, social and environmental roles. It states that these overarching objectives “are interdependent and need to be pursued in mutually supportive ways”. The objectives are:

“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 well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving

biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

At the heart of the National Planning Policy Framework is ‘**a presumption in favour of sustainable development**’ (paragraph 11). For decision taking this means:

- c) ‘...approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposal.
 - ii. Or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole”.

Decision making

The NPPF states in Chapter 4 that ‘local planning authorities should approach decisions on proposed development in a positive and creative way...Decision-makers at every level should seek to approve applications for sustainable development where possible’ (paragraph 38).

It also emphasises the value of pre-application engagement stating that ‘good quality pre-application discussions enables better coordination between public and private resources and improved outcomes for the community’ (paragraph 39).



Delivering a sufficient supply of homes

Chapter 5 of the NPPF supports the Government's objective of significantly boosting the supply of homes and recognises the importance of a sufficient amount and variety of land required and specifically that *'the needs of groups with specific housing requirements are addressed'* (paragraph 60).

The importance of a variety of housing types being recognised in planning policies is highlighted in paragraph 62 which states *'within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, **older people**, students, people with disabilities, service families, travellers'* (emphasis added).

In terms of affordable housing NPPF paragraph 63 specifies where there is an identified affordable housing need *'planning policies and decisions should specify the type of affordable housing required, and expect it to be met on-site unless:*

- *· off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
- *· the agreed approach contributes to the objective of creating mixed and balanced communities.'*

Paragraph 65 states that *'where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership'*, an exemption to this requirement is for sites that provide specialist accommodation for older people.

The NPPF recognises that small and medium sites can make an important contribution to meeting an area's housing requirement (paragraph 69).

Furthermore it goes on to state *'local planning authorities should (inter alia):*

- *· support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes'.*

In this revised NPPF the Government dedicates a whole chapter to making effective use of land (Chapter 11) as a means of meeting the need for homes and other uses. (paragraph 119).

Furthermore paragraph 120 states that *'planning policies and decisions should: (inter alia)*

- *Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.'*

The Government also encourages alternative uses of land and states, in paragraph 123, that Local Planning Authorities should *'take a positive approach to applications for alternative uses of land.'*

In order to achieve appropriate densities, paragraph 124 states *'planning policies and decisions should support development that makes efficient use of land, taking into account: (inter alia)*

- *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- *local market conditions and viability;*
- *the importance of securing well-designed, attractive and healthy places'.*

Furthermore NPPF states at paragraph 125 *'where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.'*



Paragraph 125 goes on to advocate that plans use minimum density standards for city and town centres and other locations that are well served by public transport and these should seek an uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.

Chapter 12—Achieving well-designed places

NPPF states at paragraph 126 *'the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*

Paragraph 130 sets out that *'Planning policies and decisions should ensure that developments:*

- *· will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *· are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *· are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *· establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *· optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public*

space) and support local facilities and transport networks; and

- *· create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity of existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience'.*

The NPPF goes on to state at paragraph 133 that design quality should evolve through early engagement with the local planning authority and the local community and that *'applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot'.*

Additionally, paragraph 134 states significant weight should be given to *'development which reflects local design policies and government guidance on design'* and/or *'outstanding or innovative designs which promote high levels of sustainability'.*

Planning Practice Guidance

In March 2014, the Government published supporting Planning Practice Guidance (PPG). This guidance is intended to sit alongside the NPPF and provides additional clarity in respect of NPPF Policy.

Importantly as part of the 'Housing for older and disabled people' section (paragraph 001 revision date 26th June, 2019), PPG states that:

*"The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing"* [emphasis added].

This statement is unequivocal. We find no reference to other "critical" housing needs (or similar terminology) in the guidance or within the National Planning Policy Framework. Given the acknowledgement of a "critical" need, it is for the Planning



system to deliver it unless there is very good reason why it should not. This is what government and national policy expects.

Whilst the use of the term 'critical' is recent, the imperative to provide an adequate quantity and choice of accommodation for older people has been emphasised by the Government for several years now (for example documents prepared by DCLG such as Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society (February 2008)). Key common themes have been related to the need to provide accommodation of an appropriate size, location and quality.

The majority of older people who are looking to move home in later life are downsizing from a larger family home. Hence the need to deliver a range of choice in terms of type and tenure that will enable them to make such a move. The proposed development will contribute to the provision of such a choice. The 'need' expressed in the National Planning Practice Guidance is across all tenures and types of older persons' housing ranging from bungalows to residential institutions. The proposal falls within the spectrum of accommodation cited in the NPPG and will meet a need for specialised accommodation for older people.

In conclusion, the golden thread running through the NPPF is a presumption in favour of sustainable development. The proposed development is located on an inherently sustainable site close to local facilities, providing a specialist form of accommodation for older people that addresses the urgent and increasing need within Sale and the Borough of Trafford. It is therefore wholly in keeping with the concept of sustainable development detailed within the NPPF.

Local Policy

Adopted

The current development plan for Trafford is the Trafford Local Plan: Core Strategy adopted January 2012 and the saved policies of the Revised Trafford Unitary Development Plan 2006. The site is not designated by any specific policies or allocations within the existing planning policy framework. Most of the UDP's policies are no longer operational and have been superseded by, amongst others, the Core Strategy. The relevant policy considerations within the Core Strategy are reviewed below.

Core Strategy

At paragraph 4.1 a number of Strategic Objectives are set out including:

SO1—Meet housing needs – *promote sufficient high quality housing in sustainable locations, of a size, density and tenure needed to meet the borough's needs and to contribute towards those of the city region.*

SO6—Reduce the need to travel – *promote significant levels of development in the most sustainable locations in the borough and make less sustainable locations accessible by improving transport links, particularly public transport.*

SO7—Secure sustainable development – *promote the reuse of resources, the principles of sustainable construction and the use of new technologies to combat and adapt to climate change to minimise impact of all new development on the environment.*

The Place Objectives for Sale are set out on page 37 and include:

SAO1: *To provide a more sustainable balance of housing types and tenures to meet the needs of the community.*



SAO2: *To maximize the re-use or redevelopment of unused, under used or derelict land.*

SAO3: *To secure appropriate levels of residential development within the town centre.*

Policy L1—Land for New Homes states that, *“within the overall supply of land made available for new development, the Council will seek to ensure that an adequate range of sites is made available across the Borough to allow a variety of types of housing, including accommodation that is affordable by all sectors of the local community, to be provided, subject to the capacity of the urban area and infrastructure to accommodate the development and the need to protect the environment”* (emphasis added).

The policy goes on to state that up to 2026 sufficient land to accommodate a minimum of 12,210 new dwellings will be released. Paragraph LI.4 states that *“this will be achieved through new-build, conversion and sub-division of existing properties. The Council will seek to ensure the efficient use of land, concentrating higher density housing development in appropriate and sustainable locations at lowest risk of flooding, where it can be demonstrated that it is consistent with the provisions of L2”*.

Paragraph LI.7 states that, *“an indicative 80% target proportion of new housing provision to use brownfield land and buildings over the Plan period has been set”*.

Policy L2 is entitled Meeting Housing Needs and paragraph L2.1 states that, *“all new residential development proposals will be assessed for the contribution that will be made to meeting the housing needs of the Borough and the wider aspirations of the Council’s Sustainable Community Strategy”*.

Paragraph L2.2 states that all development will be required to be:

“(a) On a site of sufficient size to accommodate adequately the proposed use and all necessary ancillary facilities for prospective residents;

(b) Appropriately located in terms of access to existing community facilities and/or delivers complementary improvements to the social infrastructure (schools, health facilities,

leisure and retail facilities) to ensure the sustainability of the development;

(c) Not harmful to the character or amenity of the immediately surrounding area; and

(d) To be in accordance with L7 and other relevant policies within the Development Plan for Trafford”.

Paragraph 2.6 considers dwelling type and mix stating that, *“the proposed mix of dwelling type and size should contribute to meeting the housing needs of the Borough, as set out in the Council’s Housing Strategy and Housing Market Assessment”*. The need for this form of specialised housing is set out in Chapter 4 of this Statement and the accompanying housing need report.

Affordable housing is considered at paragraphs L2.8 to 2.16. Sale is identified as a ‘moderate’ location where the minimum threshold for qualifying sites is 5 residential units and ‘under normal market conditions’ a 20% affordable housing contribution will be sought..

Paragraph L2.13 recognises that *“in accordance with Policy L8 of this Plan, where specific issues of viability arise, the Council will consider, on a site by site basis, whether it is appropriate to agree a reduction in the affordable housing contribution.”*

This application is accompanied by a Financial Viability Assessment that shows what level of contribution the scheme can stand.

Paragraphs 2.17 and 2.18 deal with older persons accommodation and the former states, *“in order to meet the needs arising from the increasing longevity of the Borough’s older residents, the Council will require developers to demonstrate how their proposal will be capable of meeting, and adapting to, the long term needs of this*



specific group of people.” As set out in this Statement and the Design and Access Statement, the proposed development is devoted in its entirety to the provision of housing that will meet the special needs of older people.

Policy L4 deals with Sustainable Transport and Accessibility and states that the Council will promote the development and maintenance of a sustainable integrated transport network that is accessible and offers a choice of modes of travel to all sectors of the local community and visitors to the Borough by number of means including, *“prioritising the location of development within the most sustainable areas accessible by a choice of modes of transport”*. Paragraph L4.14 to L4.16 deal with car and cycle parking standards which are considered in more detail in the Transport Statement that accompanies this application.

Policy L5 is entitled Climate Change and states that *“new development should mitigate and reduce its impact on climate change factors, such as pollution and flooding and maximise its sustainability through improved environmental performance of buildings, lower carbon emissions and renewable or decentralised energy generation”*. This application is accompanied by an Energy Statement which provides further detail on the building’s energy performance.

Policy L7 deals with Design and paragraph 7.1 states that development must:

Be appropriate in its context;

- *“Make best use of opportunities to improve the character and quality of an area;*
- *Enhance the street scene or character of the area by appropriately addressing scale, density, height, massing, layout, elevation treatment, materials, hard and soft landscaping works, boundary treatment; and*
- *Make appropriate provision for open space, where appropriate, in accordance with Policy R5 of this Plan”.*

The policy goes on at paragraphs L7.2 to L7.5 to set out criteria in respect of functionality, protecting amenity, security and accessibility. These matters and the evolution of the scheme’s design are covered in the supporting Design and Access Statement.

Policy L8 deals with Planning Obligations and at paragraph L8.10 it confirms that, *“the Council acknowledges that, in certain circumstances, a development may not be able to address all of the required planning obligations without the scheme becoming economically unviable. On these occasions, the Council will engage with developers on a site-by-site basis to consider whether contributions should be reduced in order to make development viable”*.

Emerging Planning Policy

Trafford Council published a public consultation on the Regulation 18 Draft Trafford Local Plan in February 2021. The new local plan is intended to cover the period up to 2037. Paragraph 2.1 provides clarification in terms of the plans relationship with the emerging Greater Manchester Strategic Framework, stating, *“this Regulation 18 Draft Trafford Local Plan has been prepared in the context of a sub-regional plan, the Greater Manchester Spatial Framework (GMSF) 2020, reflecting its spatial strategy and strategic policy framework. The GMSF 2020 established a range of thematic policies as well as a number of strategic allocations and Green Belt boundary amendments. Following the decision of Stockport Council in December 2020 to not approve the GMSF 2020 for Regulation 19 consultation or submission, the GMSF is no longer being progressed in its current form. The intention is to prepare an alternative sub-regional plan for the remaining Greater Manchester districts which will ultimately sit alongside the Trafford Local Plan as part of the overall Development Plan”*.

Paragraph 2.3 confirms that further alterations to the strategic context of the plan may be needed prior to the preparation of a final draft.



The Plan's vision includes that by 2037, "Trafford's communities are proud of their neighbourhoods, they have the types of homes that they want, and need. Trafford has tackled its housing crisis, with truly affordable homes at its core".

Strategic Objective SO1 is to 'deliver the homes that Trafford needs' which is "create homes for the residents of Trafford within distinct and attractive neighbourhoods. Promoting a good choice of high quality, accessible, energy efficient housing people can afford in sustainable locations, of a size, mix, density and tenure needed. Address the housing crisis through the provision of affordable housing in the right mix to support the needs of all, including an ageing population" (emphasis added).

Policy HN3 deals with older person's accommodation and states:

HN3.1 In order to meet the needs arising from Trafford's ageing population, the Council will require developers to demonstrate how their proposal will be capable of meeting, and adapting to, the long term needs of this specific group of people.

HN3.2 With specific reference to older people in Trafford, the Council will seek to meet their needs through allowing 1,943 units of the overall housing land target to be developed as new housing for older person households, suitable for a range of household circumstances (tenure and type), including 'extra-care' housing.

HN3.3 Proposals for the development of sites that will help to deliver a range of high quality, well designed accommodation for the growing ageing population of Trafford will be permitted where:

a) It is located close to local services, amenities and local centres or community hubs with high levels of community activity;

b) It is easily accessible by a range of travel modes that provides alternatives to trips made by the private car;

c) The development has been appropriately designed (paying particular attention to scale, massing, height and external appearance) to take account of the urban grain, local distinctiveness and character of the area;

d) Its design should conserve and enhance the historic environment;

e) Its design reflects current best practice guidance and the design principles for such accommodation;

f) Where the overall delivery of general market housing is not jeopardised; and

g) Due regard has been paid to all other relevant policies in the Development Plan.

HN3.4 In all cases it is expected that development designed specifically for frail elderly people will be provided to a recognised standard for "extra care" homes."

The policy's justification identifies the increase in the older population stating that, "the population of Trafford is projected to increase over the period 2019-2037, from 238,700 in 2019 to 260,500 in 2037, an overall increase of 9.1%. There will be a marked increase in the number and proportion of older residents. The population aged 65 + years is expected to increase by 38.2% (15,900) from 41,600 in 2019 to 57,500 in 2037. This compares with an increase of 40.1% across England over the same period."

The justification goes on to state, "Based on demographic change, there is a specific need for older person's accommodation; there is a need for additional 541 units of residential care (C2), 26 each year, and 1,402 units of specialist older person units (C3), 74 each year, to 2037. This indicates that around 100 units or 10% of new provision should be older person's accommodation per year. Whilst for some people, general needs housing (including Lifetime Homes) may be that most appropriate solution specifically designed or designated housing may be the best way in which to deliver support and care services for others. For this reason and to meet a specific



need identified in the Housing Needs Assessment, there is a need for the identification of approximately 1,943 units”.

Conclusion

This Planning Statement and the supporting reports demonstrate how the application proposals comply with the above policy criteria. The application fully complies with the adopted local policy framework.



Design Response

This proposal follows sound principles and pulls together different elements from the surrounding context, including those existing built forms within the site's vicinity.

The form of development and detailed design has evolved from careful consideration of its contextual analysis. The design of the Retirement Living building and careful use of materials will sit comfortably within the pattern of surrounding developments to the enhancement of the locality. The development has been sited in a manner that will ensure that the amenities enjoyed by the existing and future occupiers of nearby residential properties will not be adversely affected.

Landscaped gardens, as well as the retention and improvement of the existing boundary with the introduction of additional shrubs and trees, will provide an attractive outlook for the occupiers. Existing trees on site will be retained with the exception of those that need to be removed because of disease or poor quality/condition.

The development will be in keeping with the distinctive local character in terms of the use of materials, scale and mass whilst introducing housing to meet the needs of people in retirement. The NPPF sets out the Government's objective of achieving well—designed places at Chapter 12.

In evolving design solutions the NPPF encourages pre-application engagement with the local community, statutory consultees and the local planning authority (paragraph 132). The applicants in this case have complied with the advice and consulted with the local community and interested bodies (albeit no response has been received from the Local Planning Authority following a formal request for pre-application advice).

In summary, the proposed redevelopment of this previously developed site will provide a sympathetically designed development that will enhance the character and appearance of the local area. Additionally, the proposal will offer significant benefits including high quality landscaping and the delivery of specialist housing for older people.

Further details on the design and sustainability can be found in the accompanying Design, Access and Sustainability Statement submitted with this application.

A landscape architect and an arboricultural consultant have been commissioned and a sympathetic landscaping scheme has been devised that incorporates and supplements the existing vegetation wherever appropriate (please see the Proposed Landscaping Scheme submitted with this application).

Car Parking / Access

McCarthy Stone has unsurpassed experience in providing for the car parking needs of its specialised housing developments. Specialised housing for older people, because of its very nature and concept, is invariably located within reasonable walking distance of shops and other essential services and close to public transport facilities. It can therefore be predicted that the level of car parking proposed, given the age of the intended residents, will adequately supply sufficient parking for the residents, the House Manager and visitors.

It should be noted that the parking provision is supplemented by the provision of a battery car store, suitable for the intended residents, and provides access to alternative forms of transport. Further information has been provided in the accompanying Transport Statement.



Amenity Space

As the market leader in the provision of this form of specialised accommodation, McCarthy Stone has plenty of experience in assessing the functional requirements of its purchasers / residents. The design of the building is innovative in the ways which it maximises the potential for giving the residents optimum amenity spaces; both personal and communal through features including balconies and terraces. This will provide a high quality of life for the residents of the scheme.

Residents of this form of specialised housing tend to spend considerable time in their apartments and it is therefore appropriate that, wherever possible, lively or interesting views or pleasant and peaceful scenery should be visible from all rooms. Often the more favoured aspects are those on the busiest road frontage or those facing the main entrance and car parking area where activity is present.

The proposed development will include gardens for the enjoyment of the residents. The Company employs a professionally qualified landscape architect and prides itself on the quality of its landscape treatment, which has become a “hallmark” of all McCarthy Stone retirement schemes. A landscaping scheme is provided as part of the proposed application. Given the nature of the accommodation and the experience of McCarthy Stone in this form of development, the proposed amenity space is considered appropriate. Further details are provided in the Statement on Amenity Space Provision in Respect of McCarthy Stone Retirement Living Housing Developments that accompanies this planning application.



Above: Typical landscaping Layout



The site is ideally located for the proposed Retirement Living housing, being close to local amenities, and would provide for much needed specialised older persons housing in the local area, whilst also supporting local businesses.

Careful consideration has been given to the nature of the site, its relationship to its immediate surroundings, and the amenities of neighbouring occupiers. There is no doubt that a high quality development will make an effective use of this sustainably located site and respond to its townscape. At the same time Retirement Living housing is acknowledged to be a passive use, and an entirely sympathetic neighbour with extremely low levels of traffic generation in comparison to other potential housing uses of the site.

Points to note:

The proposed development complies fully with the NPPF's objective of a presumption in favour of sustainable development. It fulfils all three dimensions of sustainable development listed by the NPPF. Providing a range of **economic** benefits, including direct employment in its own right, supporting the local economy and revitalising the housing market through the release of under occupied family housing. Providing **social** benefits through the provision of specialist accommodation for older people and reducing pressure on health care facilities. Finally, providing **environmental** benefits through making effective and efficient use of a valuable previously developed land resource, assisting with the delivery of housing within a short term timeframe which would reduce pressures on other unallocated greenfield land for residential development.

- As set out by the accompanying Design and Access Statement the proposed development has evolved through thorough pre-application engagement with

the local community (a formal request for pre-application advice from the Local Planning Authority has been made but no response has been received at the time of preparing this Statement) and where relevant statutory consultees.

- The proposed development accords with both national and local planning policies in respect to the delivery of older persons' accommodation, which the recent National Planning Practice Guidance has identified its delivery as '*critical*'. Section Four of this report identified the extant need for older persons' accommodation within Sale and the Borough of Trafford and the current shortfall of private sector forms of retirement housing.

In summary, the proposal is fully in accordance with national and local planning policy, providing a scheme that epitomises sustainable development and contributes towards the provision of an identified local housing need as well as the overall supply of housing.

