

Aspire LPP  
Third Floor  
45 London Road  
Reigate  
RH2 9PY

2 May 2025

Strategic Planning Team  
Harborough District Council  
The Symington Building  
Adam and Eve Street  
Market Harborough  
Leicestershire  
LE16 7AG

Dear Sir / Madam,

Harborough District Council  
Regulation 19 - Proposed Draft Local Plan Submission  
Representations in support of land off Burton Way, Fleckney for allocation for a care home (C2 Use Class).

#### Introduction

These representations have been prepared in support of the allocation of Land to the east of Burton Way, Fleckney for the delivery of a purpose-built care home for the elderly frail (Use Class C2).

The site has been promoted for consideration in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) and assessed as suitable, available and achievable by the Council with delivery in the first five years of the plan period.

The Council's evidence base identifies a need for 819 care home beds over the plan period to 2041. This need is understated and is likely to be much higher. The emerging local plan proposes to meet this need with a supportively worded policy in HN04 for the delivery of specialist housing for older people alongside a requirement for a proportion of dwellings within larger developments to be specialist housing for older people. This approach on its own is unlikely to be sufficient to meet the need and a hybrid approach including some allocations specifically for care homes should be included where such sites are suitable, available and achievable. Land off Burton Way, Fleckney is a site that should be allocated for a care home.

#### Aspire LPP

Aspire LPP is a specialist care home developer with a proven track record of delivery of new, purpose-built care homes across the country. Aspire is consistently one of the largest providers of new care homes to the sector each year. Over the last 6 years, Aspire has delivered more than 15 care homes to a number of the most reputable care home operators and has a detailed understanding of care home design to achieve high-quality living spaces for residents. Aspire is

working in collaboration with the landowner of this site to promote it for a care home allocation in the emerging local plan.

## Background

This site has previously been promoted for allocation in the local plan for residential development and is assessed as suitable, available and deliverable in the SHELAA Update 2024 Site Companion Guide under reference number 21/8174. The SHELAA assessment reads as follows:

### Suitability:

#### Suitable

The site is adjacent to Fleckney, a sustainable settlement. Access is proposed via Burton Way. The site is considered suitable.

### Availability:

#### Available

The site is in single ownership and there have been discussions with potential developers. No legal or ownership issues have been identified to prevent development being delivered. The site is considered available.

### Achievability:

#### Achievable

While appropriate access would need to be demonstrated, no viability or delivery factors have been identified. The site is considered achievable.

The SHELAA confirms the site would be deliverable within years 1-5 of the plan period. Aspire confirms that this is entirely achievable.

That the site is considered sustainably located and suitable for C3 dwellings is similarly true for the delivery of a residential care home for the elderly frail, and as such this site is now put forwards for consideration for an allocation for a C2 care home. Access for a care home is entirely achievable from Burton Way. RGP highways consultancy has undertaken an assessment of the effect of the proposed care home on the highway network, as follows:

In accordance with Table 3 of the Highway Design Guide, Burton Way is designed as a 'Residential Access Road' (secondary and local Street), with a carriageway width of 4.8 metres, generally considered to be suitable to serve up to 50 residential dwellings but with a single point of access also capable of serving up to 150 dwellings.

As detailed in the assessments of 13/00211/FUL, the Burton Way is considered suitable to serve up to 30 two-way vehicle movements during any peak hour without any further improvements being required. Based on the previously approved trip rates, this would amount to around 67 residential dwellings. The access road currently serves 28 dwellings, therefore providing spare capacity along its length.

Figure 3 summarises the corresponding traffic generation potential of the site during the traditional highway peak hours, and over the course of a typical weekday and weekend.

The assessment confirms that the proposed care home would generate modest levels of weekday traffic movements to and from the site, particularly during the traditional highway peak hours, with staff shift patterns principally outside of these times. Overall, a total of 152 two-way vehicle movements are expected during a typical weekday.

MODE OF TRAVEL	AM PEAK HOUR		PM PEAK HOUR		WEEKDAY TOTAL		WEEKEND TOTAL	
	Arrival	Dept.	Arrival	Dept.	Arrival	Dept.	Arrival	Dept.
Private Car	6	6	1	3	63	67	44	50
Taxi	0	0	0	0	2	2	0	0
OGV	0	0	0	0	2	2	0	0
LGV	0	0	0	0	7	7	2	2
<b>TOTAL VEHICLES</b>	<b>6</b>	<b>6</b>	<b>1</b>	<b>3</b>	<b>74</b>	<b>78</b>	<b>46</b>	<b>52</b>
Vehicle Passenger	1	1	1	2	18	16	18	17
Pedestrian	1	1	0	0	15	20	11	12
Cyclist	0	0	0	0	5	4	2	2
Bus Passenger	0	0	0	0	1	1	2	3
<b>TOTAL PEOPLE</b>	<b>8</b>	<b>8</b>	<b>2</b>	<b>5</b>	<b>113</b>	<b>119</b>	<b>79</b>	<b>86</b>

Figure 3 Proposed Weekday Trip Generation – 70 bedroom Care Home

During the peak hours on the local highway network, the anticipated traffic generation would be low, with a peak of 12 two-way vehicle movements expected during the morning (AM) peak hour on weekdays. This is principally because staff members work alternating shift patterns, with arrivals and departures generally outside of these times. The care home would not experience the traditional peak hours associated with commuting traffic, as vehicle movements are spread more evenly through the day.

The proposed care home facility would also generate traffic at weekends. Figure 3 confirms that the care home would generate a reduced level of traffic, with 98 two-way vehicle movements expected on a Saturday and Sunday. Figure 4 illustrates the profile of daily traffic during weekdays and weekends, respectively.

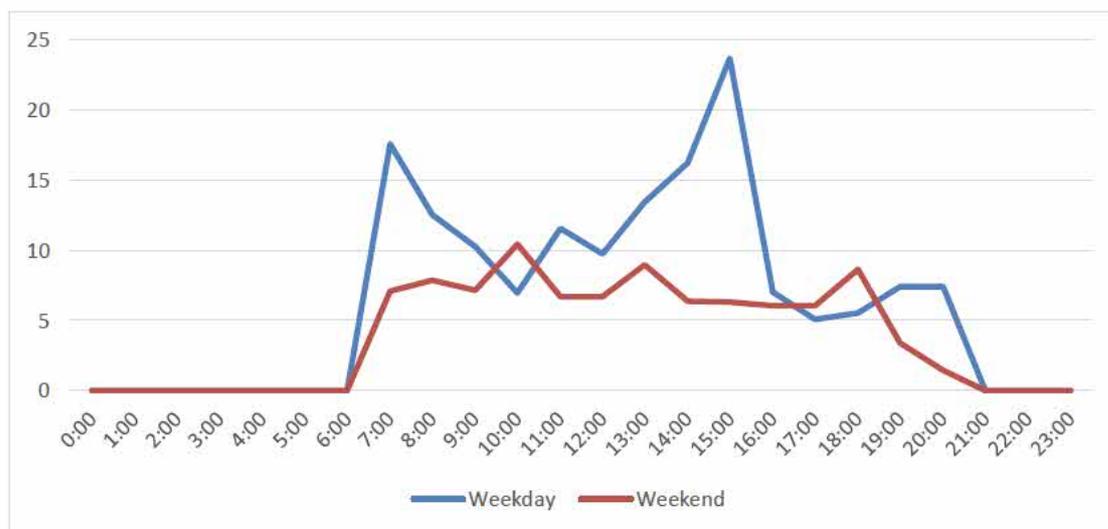


Figure 4 Profile of Daily Traffic (Two-Way Movements)

As detailed above, the proposed development is not expected to generate a significant level of traffic during the peak hours, with the peak times (shift changeovers) occurring outside of these times.

During the weekend, staff levels are generally lower, with a steady profile of visitor arrivals and departures throughout the day.

To determine the theoretical capacity of Burton Way, a review of the previous assessments for planning application 13/00211/FUL has been undertaken, including the previously approved trip rates for vehicle traffic. Based on the assessments in Section 4, Figure 7 summarises the levels of traffic likely to be using Burton Way, post-development, when compared to an assumed capacity of 50 and 67 residential dwellings respectively.

Time Period	Existing (28 Dwellings)	Equivalent 50 dwellings	Equivalent 67 dwellings	28 dwellings + care home
AM Peak Hour	12	21	27	24
PM Peak Hour	13	23	30	17

**Figure 7 Traffic Generation Comparison (Two-Way Movements) – Peak Hours**

Overall, RGP concludes that the proposed care home would have a modest impact on the functioning of the adjacent road network. The proportion of new vehicular traffic would be comfortably accommodated on Burton Way and the wider highway network.

## National Policy Framework and Guidance

### National Planning Policy Framework

Paragraph 23 states: "... Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non- strategic policies)".

Paragraph 36 deals with the examination of local plans. It states: "Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."

Paragraph 63 states: “Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children<sup>26</sup>; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.”

#### Planning Policy Guidance

Planning Practice Guidance includes a specific section focused on the delivery of housing for older and disabled people. It states: “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. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”<sup>1</sup>

Planning Policy Guidance Paragraph 003 states: “For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people.”

Paragraph 006 states “Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”

Paragraph 012 states: “Plans need to provide for specialist housing for older people where a need exists.”

Paragraph 013 confirms: “It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing.”

#### Local Plan Proposed Policy Representations

##### Policy HN04 Housing Need: Supported and Specialist Housing

Policy HN04 is the policy that seeks to ensure that sufficient specialist housing for older people is delivered over the plan period to meet the District’s need. The supporting text for HN04, table 11 Types of Specialist Housing for Older People Required, confirms that 819 care home bed spaces are needed by 2041. This is based on data and analysis provided in the Leicester & Leicestershire Housing & Economic Needs Assessment (HENA) dated April 2022, updated in June 2022.

When determining the projected need for care home beds, the report refers to three methodologies; those being SHOP@ (2008), Housing in Later Life (2012) and 2016 Housing LIN Review. Each of these methodologies carries a different prevalence rate, that being the proportion

---

<sup>1</sup> Planning Practice Guidance Paragraph: 001 Reference ID: 63-001-20190626

of the population aged 75 or over that is living in a care home. SHOP@ includes a prevalence rate of 65 persons per 1,000 population, whereas Housing LIN is 40 per 1,000 persons.

Prevalence rates as a means to determine future need must be approached with caution. Decades of undersupply of new care home bed spaces nationally has meant they are artificially suppressed by the lack of available bed spaces; if a sufficient supply of new beds had been provided in line with demand then prevalence rates would be higher. Table 11 of the supporting text for policy HN04 confirms that an additional 678 care beds are needed over the plan period, which rises to 819 when including previous shortfall or surplus. This confirms that at the start of the plan period, Harborough has a deficit of 141 bed spaces. The HENA makes adjustments to the prevalence rates used on the basis of the relative health of the elderly population in the locality, i.e. for Harborough the health compares favourably with the England average such that the prevalence rates are reduced. But it is clear from the shortfall at the start of the plan period that prevalence rates have been suppressed by the lack of supply against demand, yet no adjustment to increase the prevalence rates has been made to account for that fact. It is therefore contended that the prevalence rates should be adjusted upwards to account for previous years of artificial suppression to avoid perpetuating a cycle of under delivery.

The HENA states that the lower prevalence rate for care home beds should be applied alongside a higher rate for sheltered housing and extra care, because that fits with the County Council's and City Council's strategic approach to future provision<sup>2</sup>. This approach is unjustified. The County and City Council's strategic approach is related to local authority placement commissioning, that being residents who are funded by the local authority. In Harborough, that comprises 56.8% of residents in care homes<sup>3</sup>. 43.2% of residents in Harborough are self-funded, and County commissioning does not address those residents. To make an adjustment on the prevalence rates on the basis of a County commissioning strategy does not take account of the whole need including self-funded residents.

The policy approach is to take a generally permissive stance to specialist housing delivery that meets latest evidence on need and to require 10% of dwellings provided within developments of 100 dwellings or more to be specialist housing for older people. The generally permissive approach is welcomed and is fundamentally a requirement of any strategic approach that does not seek to allocate sites to meet the need, as is the case in the emerging Harborough Local Plan. The plan must provide sufficient support for care home proposals to ensure sufficient supply comes forward over the plan period.

The second policy criterion sets out a requirement for 10% of dwellings within residential developments of a 100 dwellings or more to be specialist housing for older people, providing the site offers a suitable location for the provision of this type of accommodation. This approach raises the following issues:

1. The policy wording uses the umbrella term of specialist housing for older people. This does not give certainty as to the mix / types of specialist housing to be provided within larger developments. Commercial competitiveness varies amongst the typologies of specialist housing for older people, with some carrying a higher land value than others. The likely outcome of this policy approach is that the allocations delivered first will include the type of specialist housing that drives the best value, following on sequentially until the least valuable type is delivered in the latter stages of the plan. This is not a sound outcome. The

---

<sup>2</sup> HENA June 2022 paragraph 11.72.

<sup>3</sup> ONA dataset Care homes and estimating the self-funding population, England, 6<sup>th</sup> July 2023

need exists across all types from the first years of the plan and should be delivered evenly throughout the plan period across all typologies.

2. The second part of the criterion confirms the 10% requirement is contingent on the site providing a suitable location for the provision of specialist housing for older people. This affords some ambiguity and casts uncertainty over the delivery of specialist housing on every site of 100 dwellings or more.

If this policy approach is to be used, the Council should adopt a hybrid strategy for the delivery of care home beds spaces, that being the allocation of any sites promoted for care homes that meet the suitable, available and achievable tests of the SHELAA. This would provide greater certainty that care home need would not fall to the end years of the plan period and fail to keep pace with the growing demand in the early and middle years.

Promotion of Land off Burton Way, Fleckney for allocation for a care home

As confirmed in the SHELAA, this site is suitable, available and achievable.

#### Sustainable location

The site is located close to the centre of Fleckney, a tier 3 large village in the settlement hierarchy, adjacent to the settlement boundary (limits to development) for Fleckney as identified in the Neighbourhood Plan. It is adjoined on two sides by development on Burton Way and the recent residential development on Freer Road to the east; both of these developments lie within the limits to development boundary. The site is close to local services including shops and public transport. Fleckney has all the key services including a food shop, GP Surgery, Library, Post Office, Primary School and pub. It is therefore a sustainable location for a care home.

#### Highways

The commentary above regarding access and highways confirms the site can be delivered with suitable access arrangements within the existing highway network.

#### Drainage

Drainage connections are available within the adjacent residential development and there are no concerns arising with achieving drainage connections. An area of surface water flood risk exists to the north of the site, but this can be removed from the development area with use of a swale feature to attenuate before discharge.

#### Trees and landscaping

Existing vegetation is confined to the boundaries of the site, and these will be retained and enhanced within the proposals. There is sufficient space on site to reinforce the north and east boundaries with further planting, utilising a mix of native species of varying heights and structures to provide a strong natural boundary and assist with achieving a biodiversity net gain.

#### Design approach

Taking account of the above, the site presents an opportunity to deliver a two storey care home with enhanced boundary landscaping which would assimilate with the existing built form on Burton Way. It is envisaged that the most appropriate design approach would be to seek to respond to the form of the Burton Way residential properties by using projections, porch, chimneys and varying material arrangements to break the elevations of the care home into 'dwelling' elements. Alongside the

enhanced boundary landscaping filtering views of the home and the back-clothe of the existing properties on Burton Way, it is considered a successful design can be achieved on this site that would sit comfortably within and positively add to the local character.

### **Conclusion**

The emerging local plan evidence base identifies a need for 819 care home beds spaces over the plan period and proposes to meet the need through a supportive approach to speculative applications and the expression of a desire for a proportion of dwellings to be specialist housing for older people. The evidence base under-represents the need for care beds and the flexibility provided in the policy related to the type of specialist housing to be provided within larger residential developments does not ensure that the need for care beds will be met in full or at a consistent and even rate across the plan period commensurate to the growing need. All opportunities to allocate suitable, available and achievable sites specifically for care home uses must be taken within the emerging plan.

Land off Burton Way, Fleckney is such a site, having been positively assessed in the Council's SHELAA already for a residential use. The site is entirely deliverable, and that Aspire LPP as a specialist care home developer is working collaboratively with the landowner affirms its deliverability. Aspire LPP would welcome the opportunity to engage with Harborough District planning policy team regarding the detail of an allocation on this site.

Yours faithfully,



## Appendix 1 – Site location plan