

Rule 6 Party  
Statement of Evidence of Need

Site: 2, 4, 6 And 8 Danson Road, Bexleyheath, Kent, DA6 8HB

Proposal: Demolition of the existing dwellings and erection of a part 1/2/3 storey building to provide a 70 bedroom nursing home, with associated access alterations, car and cycle parking, landscaping and amenity space.

PINS Ref: APP/D5120/W/22/3293225

LBB Ref: 19/03072/FULM

## 1. Introduction

1.1. This Statement sets out the Rule 6 Party evidence regarding the need for the proposed nursing home, relating to the appeal against the Council's refusal of planning application ref: 19/03072/FULM for proposals at 2-8 Danson Road, Bexleyheath, involving:

*Demolition of the existing dwellings and erection of a part 1/2/3 storey building to provide a 70 bedroom nursing home, with associated access alterations, car and cycle parking, landscaping and amenity space.*

1.2. The Statement of Evidence of Need is structured as follows:

- Section 2 – Setting the scene
- Section 3 – Lack of need for nursing care provision in Bexley
- Section 4 – Social care and nursing staffing crisis
- Section 5 - Conclusions
- Section 6 – References (Additional Sources of Evidence)

1.3. This statement has been prepared by:

NAME: Joanna Dwyer

Signed: 

Date: 15<sup>th</sup> November 2022

On Behalf of the Rule 6 Party

## 2. Setting the scene

- 2.1. The proposed plan is for a nursing home. What defines a nursing home from a residential home is that there will always be qualified nursing staff on site and a higher staff to resident ratio, as needed to reflect the increased complexity of need.
- 2.2. These homes are for people who are physically or mentally frail or people who need regular attention from a nurse.
- 2.3. They are not specifically for older people, but it is estimated that around 70% of nursing home residents have dementia (a disease commonly associated with ageing) and less than 3.5% of nursing home beds are occupied by people aged 18-65 years. Source: **Nuffield Trust, Admissions to Care Homes, 24/02/2022**
- 2.4. Nursing/care homes are not the only option available to provide the additional care and support that people might need due to disease or disability. Other options might include care and support being delivered into a person's current home, or provision of equipment or adaptation to overcome barriers and enable a person to continue to live at home.
- 2.5. Nationally, there has been a decline over recent years of the number of people admitted to care homes. The shift in social care policy and changing preferences towards home care, rather than residential care, may go some way to explaining this. Source: **Nuffield Trust, Care Home Bed Availability, 24/02/2022**
- 2.6. This is also true in Bexley, where, despite an ageing population Bexley has not identified a need for more Nursing Homes. Sources: **Bexley Housing Strategy 2020-2025** and **Bexley's Strategic Housing Market Assessment**
- 2.7. Nursing Homes are regulated by the Care Quality Commission (CQC) who rate them on 5 questions:
  - **Is it safe?** The home and any equipment is kept clean and well maintained. Managers look for ways to improve safety. There are always enough staff on duty with the skills needed to provide safe care. People are protected from abuse. Staff deal with incidents and accidents quickly and openly. People are protected by staff but also have freedom to do what they want to do.
  - **Is it effective?** People are regularly asked for their views. Staff follow care plans effectively. Staff are appropriately trained with the right skills and knowledge to meet individual needs. Consent is sought. staff liaise with other health and social care professionals as needed to provide timely support.

- **Is it caring?** Staff understand people's backgrounds, likes and needs. Protected characteristics are understood and supported. People's individual preferences are known and promoted. People are encouraged and supported to express their views and opinions. Staff understand and promoted advance care plans and personal wishes at the end of life. Staff treat people with dignity and respect. People have privacy. People have access to family and friends as they choose.
- **Is it responsive to people's needs?** Everyone has a written care plan that consider their individual needs and includes the person and their network in its development. This plan changes as the persons needs change. Staff support people to maintain ongoing relationships and interests. Staff listen to concerns and complaints and investigate them thoroughly.
- **Is it well led?** People are aware of who the manager and management team are. Managers ensure staff know what is expected of them. Staff are supported to report concerns, and if they do these are investigated. Managers ensure that they are open and feedback when things have gone wrong.

2.8. Each of these areas will receive a rating of either:

- Outstanding
- Good
- Requires improvement
- Inadequate

2.9. The service will also receive an overall rating of either:

- Outstanding
- Good
- Requires improvement
- Inadequate

2.10. Staffing is key to safety, and in the current climate staffing is a real challenge.

2.11. Within a recent report on social care workforce, the CQC reported that a lack of nurses was forcing some nursing homes to cancel their registration to provide nursing care. This was forcing emergency moves for residents within such provisions whose needs could not safely be met.

Source: **Skills for Care, October 2021 'The state of Adult Social Care sector and workforce in England'**

2.12. Registered nurses had one of the highest vacancy rates in adult social care sector as of August 2021 at 13.4%, which is a 5.0% rise since March 2020.

Source: **Skills for Care, October 2021 'The state of Adult Social Care sector and workforce in England'**

- 2.16. This paper will seek to expand upon the points specifically regarding the type of accommodation that the proposed nursing home provides, demonstrating that it is not needed in Bexley.
- 2.17. This paper will also outline how the current staffing crisis in social care and nursing means that the safety of any such provision cannot be assured, thus putting local residents at risk. And so risking the reputation of the local council and NHS teams who might be involved in placing people there.

### **3. Lack of need for additional nursing home provision in Bexley**

- 3.1. Within The Draft Statement of Common Ground, point 3, the Appellant states that the proposed development will result in a net increase of 66 homes. We disagree.
- 3.2. The definition of a home is a place that a person lives permanently, as a member of a family or household. A place that provides a safe haven and comfort. A place that is chosen and can be enjoyed with family, friends and pets. This is not what a nursing home provides.
- 3.3. Within the submitted Draft Statement of Common Ground, point 25, the Council states that the harm of losing 4 family dwellings is outweighed by the benefits of 70 nursing and nursing dementia beds that the proposed development would provide. This is not reflected in local and national guidance.

### **Local Need**

- 3.4. The Bexley Housing Strategy 2020-2025 clearly states that what is needed in Bexley is a broader range of housing options for older people than is currently available.

*“The overarching aim of our Housing Strategy for older people is to enable them to feel safe and secure in a place they consider to be home, living independently for as long as possible and connected to a local community and network of social support. Residential care should be a last resort and situations where decisions about long term care are made in a crisis (e.g. from a hospital bed) should be prevented. To enable this there needs to be a much wider range of housing options for older people than currently exists in Bexley. This includes everything from housing adaptations and assistive technology solutions to enable people to stay in their own homes, to a modern high-quality sheltered accommodation offer, to extra care housing with communal facilities and 24-hour concierge service. Options need to be available across the borough recognising that people do not necessarily want to uproot themselves from their familiar community and that retaining support*

*networks are a protective factor in preventing loneliness and isolation. To accommodate the needs of older people from various socio-economic groups, housing needs to be of mixed tenure, for sale (affordable), social or private rental and needs to allow for single adults, couples and other configurations of friends/siblings etc who may choose to live together in old age. The option of multi-generational living should also be explored with properties which can accommodate several generations of the same family.”*

**Bexley Housing Strategy 2020-2025, page 10**

- 3.5. Bexley’s Strategic Housing Market Assessment (SMHA) 2020 suggests that the vast majority of people want to remain in their own home with support when needed. The SHMA shows there is a need for affordable specialist older persons accommodation where people can live independently but there is exceptionally low demand for additional residential care homes in the borough. Although superseded by the 2021 report, this remains relevant as this paper was current when The Appellant’s proposal was being considered.
- 3.6. Bexley’s Strategic Housing Market Assessment (SMHA) 2021 continues to highlight the need for alternative thinking about housing options for older people and a need to diversify from the current range of accommodation available to meet the needs of Bexley’s older people.
- *“The 2018 household survey indicates that the majority of people aged 55 and over (71.5%) want to remain in their current home with help and support when needed.... There is also interest in a range of options including sheltered, Extra Care, co-housing and open market accommodation from older age groups.”* **Page 111, point 6.20**
  - Of households with a householder aged 65 and over and planning to move, the Household Survey found that the main reason for moving (cited by 30.9% of respondents) were health problems and/or needing housing suitable for an older or disabled person. **Page 119, point 6.24**
  - People aged 65 and over make up the majority of the Bexley Adult Social Care client group (64% in 2015/16). A significant proportion of clients are aged 85 and over (30%). **Page 122, point 6.30, bullet point 4.** The predominant plan of respondent was to move to a smaller property (26%).
  - This is also noted as a positive in that provision of a wider range of older persons’ accommodation has the obvious potential to make available family homes that people are otherwise over accommodated in.

- Based on the finding of the survey, officers recommended that the development of Extra Care Housing becomes a formal strategy. **Page 123, point 6.30, bullet point 7.**
- Extra Care Housing is specialist housing provision that is designed for older people. It is similar to sheltered housing in that it provides self-contained independent units (for example flats or bungalows) that combine accommodation with care and /or support services. Extra Care can provide more flexible approaches to need, for example for a couple where one partner has greater care needs, extra care can support the couple to carry on living together.
- The document refers to the Planning Policy Guidance and the recommendations for people living with dementia stating that “*there should be a range of housing options and tenures available to people with dementia, including mainstream and specialist housing. Innovative and diverse housing models should be considered where appropriate*” **PPG Paragraph: 019 Reference ID: 63-019-20190626.**
- The report states that older people are living in under-occupied housing stock in Bexley because their only other option currently is residential or nursing accommodation. A variety of alternative accommodation is needed.

3.8. The Appellant states that  
*“the site of the home is at the centre of the wards with the highest numbers of older people: Sidcup, Longlands, St Mary’s and Blendon & Penhill wards, and the former Brampton, who have 20% or more of their population aged 65+.”*  
 Source: **Danson Road Nursing Home Proposal, Carebase**

3.9. The proposed site is not in the centre of those wards, or in fact within any of those existing wards.

### **National Need**

3.10. These local findings are in agreement with a National Inquiry report published in February 2021 by the All Party Parliamentary Group (APPG) on Housing and Care for Older People, which states that the vast majority of older people wish to stay within their existing homes, and for most, this is an informed and appropriate choice where current and future housing needs can be addressed through in situ solutions (including adaptations). Source: **Housing for people with dementia – are we ready? A report from an Inquiry by the APPG on Housing and Care for Older People, February 2021**

3.11. In direct agreement with local findings and recommendations, the same report also suggests that councils should be seeking to support increased provision of Extra Care housing / assisted living accommodation and retirement housing

that is dementia-ready. Again, highlighting that this is key to supporting people's preference to live in their own home in the community with adaptations, assistive technology and social care support if needed.

- 3.12. Chapter 3 of this same report discusses the importance of housing choices for people with dementia. It highlights the evidence base that people with dementia benefit from being integrated with others in family and group settings, rather than being segregated into housing situations solely with other people with dementia. This segregation is what often happens in nursing homes.
- 3.13. The desire to live, and importantly die at home, is also well reported in end of life literature. Sources: **Nuffield Trust End of life care Survey 31/10/2022** and **National Survey of Bereaved People (VOICES): England 2015, published 22/07/16**
- 3.14. Only 7% of people surveyed in the VOICES study had made an active choice to die in a care home.

### **Current provision in Bexley**

- 3.15. Within The Draft Statement of Common Ground, point 7, The Appellant states that there is an established unmet need for nursing home accommodation with proportion of that nursing accommodation being dementia care in Bexley. The Council agree. We have not been able to find the source of evidence for this statement.
- 3.16. The Appellant has seemingly based their claim that Bexley needs more Nursing Home beds on:  
  
*“the national likelihood of requirement for some form of care in either a care home or long stay hospital bed (source: Laing and Buisson, Care of Older People), we have then forecast figures against the projected ageing population for the next five and ten years assuming the current bed supply remains the same”* Source: **Danson Road Nursing Home Proposal, Carebase Ltd.**
- 3.17. Within The Draft Statement of Common Ground, point 31, The Appellant states that the proposed development will provide critical illness and end of life care, including dementia care to future residents.
- 3.18. There was insufficient time within the current process by which to seek Freedom of Information requests regarding bed vacancies and waiting lists in current nursing care homes in Bexley as we would have liked to, to understand current needs better. However, in lieu of this an exercise was undertaken to contact the 12 Bexley based nursing homes below to enquire about vacancies. The homes were contacted on 12<sup>th</sup>, 13<sup>th</sup> and 14<sup>th</sup> November by telephone and asked if they had current nursing bed availability.



3.19. **Table 1: Local nursing home vacancies on 12<sup>th</sup> /13<sup>th</sup> /14<sup>th</sup> November 2022**

<b>Nursing Home in Bexley</b>	<b>Care provider</b>	<b>Nursing bed vacancy</b>
<b>Heathfield Court Care Home</b> 147 Colyers Lane, Northumberland Heath, Erith DA8 3PB 01322 251649	Carebase Ltd	Yes
<b>Smyth Lodge</b> 2 Frognal Avenue, Sidcup DA14 6LT 020 3944 5145	Care UK	Yes
<b>Adelaide Care Home</b> 35 West Street, Bexleyheath DA7 4BE 020 8031 7127	Avery	No – but no waiting list
<b>Abbotsleigh Mews Care Home</b> Old Farm Road East, Sidcup, DA15 8AY 020 8003 2837	Bupa	Yes
<b>Maples Care Home</b> 29 Glynde Road, Bexleyheath, DA7 4EU 020 8298 6720	Maples Care Home	Yes
<b>Marlborough Court Care Home</b> 7 Copperfield Road, Thamesmead, SE28 8QA 020 8108 9064	Four Seasons Health care	Yes – general nursing, not registered for dementia
<b>The Sidcup Care Home</b> 2/8 Hatherley Road, Sidcup, DA14 4BG 020 3797 4644	Bupa	Yes
<b>Meyer House Care Centre</b> 28 Meyer Road, Erith, DA8 3SJ 01795 470272	Nellsar Care Homes	No
<b>Baugh House</b> 19 Baugh Road, Foots Cray, Sidcup, DA14 5ED 020 3833 1001	Gold Care Homes	No reply to repeated calls
<b>St Aubyns Nursing Home</b> 35 Priestlands Park Road, Sidcup, DA15 7HJ 020 8300 4285	Single private nursing home	No – but no waiting list
<b>Lyndhurst Nursing Home</b> 238 Upton Road South, Bexley, DA5 1QS 01322 523821	Single private nursing home	Yes
<b>St Mary's Nursing Home</b> 327 Main Road, Sidcup, DA14 6QG 020 8302 7289	Single private nursing home	Yes

3.20. Of the 11 Nursing Homes successfully contacted, 8 had immediate vacancies, including within the other nursing home provided by The Appellant. 2 homes that did not have current vacancies reported not to have a current waiting list.

3.21. Although the demand and vacancies for beds can change day to day, there is no suggestion from this simple exercise that there is an urgent need for additional Nursing beds currently in Bexley.

### 3. Social Care and Nursing Staffing Crisis

#### Impact on Existing Services

- 4.1. The Appellant's proposed plans are for a 70- bedded nursing home. This brings with it a need to staff the nursing home and for any future residents to have access to local healthcare support, including inpatient NHS service, Community NHS services and GP services, amongst others.
- 4.2. Within The Draft Statement of Common Ground, point 23, The Appellant states that the development will reduce pressure on local NHS services, whilst the council states that the appellants contribution to the NHS will render the impact neutral. This however cannot be known as any impact would only be known once people were living there and their individual health needs were known.
- 4.3. The usual practice for a nursing or care home is to register all occupants with a local GP. Although The Appellant states that they will employ a retained GP, that recruitment first has to happen and even with that, residents of nursing homes have the right to register with a local GP and that right cannot be removed.
- 4.4. The lack of GP provision in Bexley is a long standing one, and a report by the Royal College of General Practitioners (RCGP) in 2015 highlighted that *"Bexley in south London will need 87% more [family doctors] by 2020 in order to keep up with the expected growing demand for appointments."*
- 4.5. This same report states that Bexley has historically found it difficult to attract primary care staff to the area.
- 4.6. A Brief produced by RCGP in July 2022 states that the number of (full time equivalent) qualified GPs has fallen 5% between September 2015 and September 2021, whilst the population has risen by 4% and health problems are growing in complexity.
- 4.7. The UK average of patients per GP is 1719.
- 4.8. The Bexley average of patients per GP is 1841, so Bexley GPs on average have 122 more patients than the average UK GP already.
- 4.9. Bexley Healthwatch's GP Access Report, November 2021, reports an increase in concerns from Bexley residents regarding difficulties in being able to both make and access timely GP appointments, resulting in an increase in residents wishing to make complaints to their GP surgery.
- 4.10. Again due to the limited time available, we have not been able to submit Freedom of Information requests to ascertain the patient/GP ratios, staff

vacancies and number of complaints in the GP practices closest to the proposed development as we would have liked to.

## Recruitment challenges

4.11. The Kings Fund produced a report in November 2021 ***‘Why social care is losing the ‘generation game’ in recruitment’*** and considered the pathway into care work for young people, which states that:

*“In 2020/21 there were around 105,000 vacancies in care homes at any one time, with a staff turnover of 34.4%”*

4.12. These figures did not include the pre-existing need to recruit a further 490,000 care workers to respond to increasing demand from an ageing population (but with more working age adults with disabilities who might have been employed in such roles).

Source: ***‘Why social care is losing the ‘generation game’ in recruitment’*** November 2021.

4.13. Another report from Skills for Care published in October 2021 **The State of Adult Social Care sector and Workforce in England**, states that:

- *“Vacancies are now at higher than pre-pandemic (8.2% compared to 8% pre pandemic)”*
- *“Sickness rates are higher. Average 9.5 days in past 12 months compared to 5.1 days pre pandemic.”*
- *“In the first four months of 2019, 5.2% of new starters into care work were from outside of the UK. In the first 4 months of 2021 that was down to 1.8%. Brexit and the restrictions on free movement have impacted significantly on this sector.”*
- *“Vacancy rates dropped during the pandemic as demand for work was increased. Since the employment market has reopened post pandemic (since May 2021) vacancy rates has steadily risen. As of August 2021, vacancy rates are above that of pre pandemic.”*

4.14. The updated 2022 report states that in the 10 years that data has been collected within these reports, the vacancy rate in the adult social care sector has increased from 3.8% in 2012 to 10.7% in 2022. With vacancy rates in adult social care now being at the highest rate since records began in 2012 (increased by 52% this past year).

Source: **The State of Adult Social Care sector and Workforce in England**, October 2022

4.15. Recent changes could increase the supply of care workers, including:

- Increased pay rates for care workers
- Care workers being added to the shortage occupation list since February 2022
- The rescinding of the mandatory vaccination policy in February 2022

- 4.16. However, the availability of jobs in the wider economy, which are often equally or better paid, with less perceived demand, appears to be cancelling out any potential gains.  
Source: **The State of Adult Social Care sector and Workforce in England, 2022, page 17.**
- 4.17. Within this same report the CQC reported that a lack of nurses was forcing some nursing homes to cancel their registration to provide nursing care. This was forcing emergency moves for residents within such provisions whose needs could not safely be met. This is pertinent to the proposed development in Danson Road, which would require 24-hour on-site nursing cover.
- 4.18. The report highlights that registered nurses were one of the only job roles in adult social care to see a significant decrease in filled posts over the 10 year period of data collection (down 18,500 filled posts, or 36% since 2012/13).  
Source: **The State of Adult Social Care sector and Workforce in England, 2022**
- 4.19. The number of registered nurse filled posts has decreased year-on-year between 2012/13 and 2021/22 (from 51,000 to 32,000). This could be related to the recruitment and retention problem facing employers of registered nurses, with a vacancy rate of 14.6%, which is around 4,900 vacancies.  
Source: **The State of Adult Social Care sector and Workforce in England, 2022, page 49.**
- 4.20. Although the data relates to NHS vacancies, London has the highest rate of nursing vacancies in the UK of 10.9% (full time equivalent vacancy rate, January -March 2022)  
Source: **The NHS Workforce in Numbers, The Nuffield Trust, 12/10/22.**
- 4.21. This same report also highlights the dramatic decline in the number of EU nurses coming to work in the UK post Brexit. Given the previous reliance of the health and social care sector on staff from overseas, this is a serious concern to safe staffing.
- 4.22. More recently (as a result of Brexit), nurses who trained in the EU and want to work in the UK are now subject to the same application process as those who trained outside the EU. This has implications, for example, for the fees and the skills and knowledge tests that have to be undertaken for those looking to join the UK nursing register.  
Source: **The Health Foundation 2018; Nursing and Midwifery Council 2022**
- 4.23. There is also a threat posed by the ageing demographic of qualified nurses, where there is a large cohort approaching pensionable age. 27% are aged between 45 and 54 and more than one in six (17.6%) are aged 55 and over.  
Source: **The Health Foundation 2018; Nursing and Midwifery Council 2022**
- 4.24. Filling nursing vacancies with temporary or agency staff can provide some flexibility of approach and new thinking, however there can be negative consequences: Costs are higher, continuity of care is not challenged and as a result patient care can easily be compromised.

4.25. Nursing assistant and care support worker roles work alongside registered nurses to deliver hands on care and so are equally important in provision of nursing home care.

### Local Nursing Home Staffing Vacancies

4.26. There was insufficient time within the current process by which to seek Freedom of Information requests regarding current nursing and care assistant staffing issues and recruitment campaigns in the nursing homes in Bexley as we would have liked to.

4.27. In lieu of this, an exercise was undertaken to review the recruitment campaigns for the local nursing homes that had a website where that information could be seen. This exercise was undertaken on 13<sup>th</sup> November and all the nursing homes who had a website with details of current vacancies, had recruitment campaigns for nursing and care assistants (and other staff including chefs, domestic roles and activity coordinators). This includes The Appellants other home in Bexley.

4.28. Some homes were offering sign on bonuses of up to £2,000 for registered nurses, which highlights the additional steps homes are having to take to attract qualified nursing staff in a climate where it is increasingly difficult and to ensure safe staffing levels.

### 4.29. Table 2: Local nursing home staffing vacancies on 13th November 2022

Nursing home in Bexley	Care provider	Nursing staff vacancies/ current Nursing team recruitment campaign
<b>Heathfield Court Care Home</b> 147 Colyers Lane, Northumberland Heath, Erith DA8 3PB 01322 251649	Carebase Ltd	<b>Yes</b> <ul style="list-style-type: none"> <li>Registered General Nurse</li> <li>Care Assistant (days and Nights)</li> </ul>
<b>Smyth Lodge</b> 2 Frogna Avenue, Sidcup DA14 6LT 020 3944 5145	Care UK	<b>Yes</b> <ul style="list-style-type: none"> <li>Nurse manager</li> <li>Care Assistant</li> </ul>
<b>Adelaide Care Home</b> 35 West Street, Bexleyheath DA7 4BE 020 8031 7127	Avery	<b>Yes</b> <ul style="list-style-type: none"> <li>Care Assistant</li> </ul>
<b>Abbotsleigh Mews Care Home</b> Old Farm Road East, Sidcup, DA15 8AY 020 8003 2837	Bupa	<b>Yes</b> <ul style="list-style-type: none"> <li>Registered Nurse★</li> <li>Care Assistant</li> </ul> ★ £1,000 welcome bonus
<b>Maples Care Home</b> 29 Glynde Road, Bexleyheath, DA7 4EU	Maples Care Home	<b>Yes</b> <ul style="list-style-type: none"> <li>Clinical Manager (nurse)</li> <li>Registered Nurse</li> </ul>

020 8298 6720		<ul style="list-style-type: none"> <li>Care Assistant</li> </ul>
<b>Marlborough Court Care Home</b> 7 Copperfield Road, Thamesmead, SE28 8QA 020 8108 9064	Four Seasons Health care	<b>Yes</b> <ul style="list-style-type: none"> <li>Registered General Nurse</li> <li>Senior Care Assistant</li> <li>Care Assistant</li> </ul>
<b>The Sidcup Care Home</b> 2/8 Hatherley Road, Sidcup, DA14 4BG 020 3797 4644	Bupa	<b>Yes</b> <ul style="list-style-type: none"> <li>Registered Nurse ★</li> <li>Senior care Assistant</li> <li>Care Assistant</li> </ul> ★£1,000 welcome bonus
<b>Meyer House Care Centre</b> 28 Meyer Road, Erith, DA8 3SJ 01795 470272	Nellsar Care Homes	<b>Yes</b> <ul style="list-style-type: none"> <li>Healthcare Assistants (nights)</li> </ul>
<b>Baugh House</b> 19 Baugh Road, Fooks Cray, Sidcup, DA14 5ED 020 3833 1001	Gold Care Homes	<b>Yes</b> <ul style="list-style-type: none"> <li>Registered Nurse ★</li> <li>Senior Care Assistant</li> <li>Care Assistant</li> </ul> ★£2,000 welcome bonus
<b>St Aubyns Nursing Home</b> 35 Priestlands Park Road, Sidcup, DA15 7HJ 020 8300 4285	Single private nursing home	No website
<b>Lyndhurst Nursing Home</b> 238 Upton Road South, Bexley, DA5 1QS 01322 523821	Single private nursing home	No website
<b>St Mary's Nursing Home</b> 327 Main Road, Sidcup, DA14 6QG 020 8302 7289	Single private nursing home	No website

4.30. The Appellant already runs 13 homes, 11 of which are nursing homes and 2 of which are residential homes (Honey Lane and The Spinney).

4.31. The Appellant is not protected in any way from the current staffing crisis. On review of the Carebase Ltd website on 13<sup>th</sup> November 2022, 12 of the 13 homes that they run were recruiting for staff.

4.32. Of the 11 Nursing Homes that Carebase Ltd. run, 5 were recruiting for qualified nursing staff.

4.33. 12 of the 13 homes were recruiting for care assistants.

**4.34. Table 3: Carebase Ltd. advertised vacancies for nurses and care assistants on 13<sup>th</sup> November 2022**

Carebase Home	Current Recruitment campaign	Nursing vacancies	Support staff vacancies
Acorn Court	Yes	No	Care Assistant (days)

RH1 2NX			Care Assistant (nights) £9.75 per hour
<b>Alderwood</b> CO1 1ZP	Yes	No	Care Assistant (days) Care Assistant (nights) £9.70 per hour
<b>Ashbrook Court</b> E4 7RG	Yes	Registered General Nurse (nights) £19.50 per hour	Care Assistant (days and nights) Care Assistant £9.75 per hour
<b>Bramley Court</b> CB24 9AH	Yes	Registered Nurse (nights) – 36 hours per week Registered Nurse (nights) – 40 hours per week £20.00 per hour	Care Assistant (days and nights) £10 per hour
<b>Bridge House</b> OX14 3UJ	Yes	No	Care Assistant (days) Care Assistant (nights) £10.50 per hour
<b>Brooklands Nursing and Residential Home</b> NR8 6HB	Yes	No	Care Assistant Dementia Care Assistant £9.75 per hour
<b>Cherry Wood Grange</b> CM2 0AR	Yes	No	Care Assistant (days and nights) £9.75 per hour  Care Assistant (days) £10.00 per hour
<b>Claremont Court</b> GU2 9QA	Yes	Registered General Nurse £19.50 per hour	Care Assistant (days) Care Assistant (nights) £10.50 per hour
<b>Heathfield Court</b> DA8 3PB	Yes	Registered General Nurse £19.18 per hour	Care Assistant (days and nights) £10.00 per hour
<b>Honey Lane Care Home</b> EN9 3BA	Yes	No Residential Home, so no nursing staff requirement	Care Assistant (Nights and Weekends) £9.75 per hour  Senior Carer £10.50 per hour  Care Assistant (weekends) £9.75 per hour  Care Assistant (days) £9.75 per hour  Senior Care Assistant £10.50 per hour

<b>Queen Elizabeth Park</b> GU2 9LL	Yes	Registered General Nurse £19.29 per hour	No
<b>The Spinney</b> E4 7AU	Yes	No Residential Home, so no nursing staff requirement	Night Care Assistant £9.83 per hour  Night Senior Carer £11.50 per hour  Carer Days £9.83per hour
<b>Water Mill House</b> HP3 9TE	Yes	No	No

4.35. The salary being offered was minimally variable but for care assistant roles, although over the minimum wage, was less than the living wage.

4.36. The rate of pay for care assistants in The Appellant's other Bexley based service was offering a salary below the London Living wage, and at the time of checking was below that being offered by a supermarket close to that provision (Crayford Sainsbury's store colleague, £10.25-£11.30 per hour)

- Minimum wage UK is £9.50 per hour (for over 23 year olds), £9.18 per hour (21-22 year olds), £6.83 per hour (18-20 year olds)
- Living wage UK is: £9.90 per hour
- London Living wage is £11.05 per hour

Source: **Gov.uk**

4.37. Within the appellants plans, the stated number of required staff has been considerably underestimated.

4.38. The best practice for staff based on the number of beds and the needs of people with dementia should be based on completion of a dependency calculator that looks at the needs of each resident and then calculates the amount of staff required to meet those physical needs. Therefore, the appellant is unable to estimate the number of staff needed.

4.39. Within Bexley, specialist end of life support comes from Bexley and Greenwich Hospice team, who offer remote training advice and support to care home teams. Source: <https://www.communityhospice.org.uk/how-we-can-help-for-patients/care-homes-team/>

4.40. The hands on care is predominately provided in house by the nursing and care assistants. This is an additional skill set to providing care and support to people with dementia.

4.41. The national staffing crisis and the evident number of vacancies locally would infer that The Appellant will struggle to fully staff the proposed nursing home.



## Staffing and safety

4.42. Safety within care homes is inextricably linked to staffing, in terms of the right amount of staff, with the right training.

4.43. This is part of what is reviewed by CQC when they undertake inspections.

4.44. The Appellant already runs 13 homes, 11 of which are nursing homes and 2 of which are residential homes (Honey Lane and The Spinney). All of these are registered with and inspected by CQC as per required process.

4.45. Three of The Appellant's homes are overall rated by CQC as requiring improvement. All of those are nursing homes.

4.46. Three of The Appellant's homes are rated as Outstanding overall, but none of those are rated outstanding on safety. The other 7 are rated overall as Good, but one of those is rated as Requires Improvement in safety.

### 4.47. Table 4: CQC ratings for all Carebase Ltd. homes. Accessed on 12.11.22

Home	CQC RATING					
	Overall	Safe	Effective	Caring	Responsive	Well led
<b>Acorn Court</b> RH1 2NX	Good	Good	Good	Good	Good	Good
<b>Alderwood</b> CO1 1ZP	Outstanding	Good	Good	Outstanding	Outstanding	Outstanding
<b>Ashbrook Court</b> E4 7RG	Requires Improvement	Requires improvement	Good	Good	Requires improvement	Requires improvement
<b>Bramley Court</b> CB24 9AH	Outstanding	Good	Good	Outstanding	Outstanding	Good
<b>Bridge House</b> OX14 3UJ	Outstanding	Good	Good	Good	Outstanding	Outstanding
<b>Brooklands Nursing Home</b> NR8 6HB	Requires Improvement	Requires Improvement	Good	Good	Good	Requires Improvement
<b>Cherry Wood Grange</b> CM2 0AR	Good	Good	Good	Good	Requires Improvement	Good
<b>Claremont Court</b> GU2 9QA	Good	Good	Good	Good	Good	Good
<b>Heathfield Court</b> DA8 3PB	Good	Good	Good	Good	Good	Good
<b>Honey Lane Care Home</b> EN9 3BA	Good	Requires Improvement	Good	Good	Good	Good
<b>Queen Elizabeth Park</b> GU2 9LL	Good	Good	Good	Good	Outstanding	Good
<b>The Spinney</b>	Good	Good	Good	Good	Good	Good

E4 7AU						
<b>Water Mill House</b> HP3 9TE	Requires Improvement	Requires Improvement	Good	Good	Good	Requires Improvement

4.48. Staffing issues were highlighted within the CQC reports of The Appellants homes rated as Requires Improvement overall or those that Require Improvement in safety:

4.48.1. *“The registered manager said there had recently been staff who had resigned, and they were actively recruiting. Staff said this had been difficult and at times left shifts short.”* **CQC Inspection report, August 2021, Water Mill House**

4.48.2. *“Staff acknowledged that staffing shortages had affected the morale, however, knew that the management were actively recruiting. One staff member said, “Staffing is a challenge for now because some staff have left and others going off sick. We are not always able to get agency cover and we sometimes have to manage with fewer staff on shift. Managers are trying to recruit over the required numbers so that we always have enough staff.”* **CQC Inspection report, August 2021, Water Mill House**

4.48.3. *“Concerns had been raised about staffing levels at the service”* **CQC Inspection report, February 2022, Honey Lane Care Home**

4.48.4. *“Staff told us they had gone through a difficult period where agency staff usage had increased, and this had impacted on the care delivery.”* **CQC Inspection report, February 2022, Honey Lane Care Home**

4.48.5. *“The registered manager told us a recruitment drive had been positive and several new staff were joining the team. This would reduce the use of agency and bank staff which had been used to support when unexpected absence had occurred.”* **CQC Inspection report, May 2022, Brooklands Nursing and Residential Home**

4.48.6. **CQC Inspection report, February 2022, Ashbrook Court,** highlighted concerns related to inadequately skilled staff, stating that *“Medication practices were not safe, and people did not always receive their medicines as prescribed.”* And also that *“Care plans relating to people’s end of life care arrangements were not sufficiently detailed.”*

4.49. Even where ratings were Good, staffing issues were highlighted

4.49.1. *“Although there were enough staff most of the time, there were times when the staffing levels were not adequate.”* **CQC Inspection report, November 2022, Acorn Court**

4.49.2. *“Although the registered manager had made positive changes and staff and relatives spoke highly of them, we would need to see a stable management team in the future to ensure improvements are sustained.”* **CQC Inspection report, November 2022, Cherry Wood Grange.** This statement was made following on from the report based on the previous inspection in February 2020, that rated the home as Requiring Improvement that states *“we received mixed feedback about whether there were enough staff to meet people’s needs.”*

4.50. Skilled staffing is also an important factor in provision of end of life care, which The Appellant also states would be offered within the proposed development.

4.51. Although care homes are often identified as a housing choice in end of life care, people and their families have frequently reported that within care home settings there is a lack of appropriately trained staff to offer the specialist support that palliative patients may need.

Sources: **Ambitions for Palliative and End of Life care: A national framework for local action 2021-2026, published May 2021,** and **National Survey of Bereaved People (VOICES): England 2015, published 22/07/16**

4.52. The staffing crisis in both health and social care is a real and obvious risk to the Nursing Home sector and cannot be ignored.

## **5. Conclusions**

5.1. The proposed provision of 70 nursing beds does not meet an evidenced need in Bexley.

5.2. The evidence above highlights that although Bexley needs to consider different types of housing for its ageing population, nursing home accommodation is not what local residents want or need.

5.3. Bexley is in line with national guidance with its findings to address the needs of older people’s housing with creative solutions that are not currently available, e.g. with Extra Care Provision.

5.4. The national staffing crisis in health and social care is a real and valid risk and cannot be mitigated by The Appellant.

## 6. References (Additional Sources of Evidence)

- Skills for Care published in October 2022 **The State of Adult Social Care sector and Workforce in England** [The state of the adult social care sector and workforce 2022 \(skillsforcare.org.uk\)](https://skillsforcare.org.uk)
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- **Housing for people with dementia – are we ready?** A report from an Inquiry by the APPG on Housing and Care for Older People, February 2021 [HCOP APPG Dementia Housing and Care Inquiry-LowRes.pdf \(housinglin.org.uk\)](https://housinglin.org.uk)
- **RCGP Brief, July 2022: GP shortages in England** [RCGP-Brief\\_GP-Shortages-in-England.pdf](https://www.rcgp.org.uk/media/1024767/RCGP-Brief_GP-Shortages-in-England.pdf)
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- BMJ Over 70% increase in GP numbers needed in some areas, says RCGP. BMJ 2015; 350 doi: <https://doi.org/10.1136/bmj.h827> (Published 11 February 2015)
- **National Survey of Bereaved People (VOICES): England 2015.** Quality of care delivered in the last 3 months of life for adults who died in England. Published 22/07/16 [National Survey of Bereaved People \(VOICES\) - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)
- **Ambitions for Palliative and End of Life care: A national framework for local action 2021-2026**, published May 2021 <https://www.england.nhs.uk/wp-content/uploads/2022/02/ambitions-for-palliative-and-end-of-life-care-2nd-edition.pdf>
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- Nuffield Trust, **The NHS Workforce in Numbers**, 12/10/2022 [The NHS workforce in numbers | The Nuffield Trust](https://www.nuffieldtrust.org.uk/resource/the-nhs-workforce-in-numbers)
- The Kings Fund, **'Why social care is losing the 'generation game' in recruitment'** November 2021 <https://www.kingsfund.org.uk/blog/2021/11/social-care-recruitment-younger-workers>
- **NHS Vacancy Statistics** <https://digital.nhs.uk/data-and-information/publications/statistical/nhs-vacancies-survey>
- London Borough of Bexley, **Strategic Housing Market Assessment 2021** [Strategic Housing Market Assessment 2021 \(bexley.gov.uk\)](https://www.bexley.gov.uk)
- London Borough of Bexley, **Housing Strategy 2020-2025** <https://www.bexley.gov.uk/sites/default/files/housing-strategy-2020-2025.pdf>