

### **Matter 3.7 – Older people’s housing**

Response from Lambeth Council & NHS Integrated Commissioning to the supplementary hearing statement from Carney Sweeney Planning on behalf of Coin Street Community Builders dated 27 October 2020 (6 November 2020)

1. The provision of a new nursing home at Gabriel’s Wharf does not meet the need of Lambeth residents as a whole and is heavily reliant on attracting placements from neighbouring boroughs and those north of the river.
2. Lambeth’s borough-wide assessment of need for older people’s housing is within the Lambeth SHMA 2017 ([EB09](#)), page 69 onwards, which has been prepared in accordance with the requirements of the Planning Practice Guidance (paragraph: 004 Reference ID: 63-004-20190626). This SHMA was available for comment during all three rounds of public consultation on the Draft Revised Lambeth Local Plan, from October 2017 onwards. At no point during this period did CSCB or their representatives submit comments or representations about the data included in the SHMA or the methodology used. Had the Council received such comments, it would have sought a meeting to discuss them in a timely way. The first time the Council received the CSCB evidence on nursing home need was 24 September 2020.
3. CSCB say in their supplementary statement that they “do not think it is productive to enter into a debate about methodology” (para 1.1.3). However, methodology is fundamental to ensure a needs assessment presents an accurate picture of forecast need. The CSCB commissioned report does not address the requirements of the Planning Practice Guidance.
4. An assessment of nursing home need should also take account of the professional advice of relevant statutory service providers, which has not occurred in the case of the CSCB report commissioned from Kingsbury Hill Fox. Lambeth planning officers and Ms Clegg made a number of requests to meet with CSCB during the Summer of 2020 before they completed their Kingsbury Hill Fox report, but the offer was not taken up until after the report was completed and sent to the Council on 24 September 2020. Please see the attached email trail.
5. CSCB’s supplementary statement quotes paragraph 4.13.14 of the Intend to Publish London Plan, which gives a London wide figure for additional care home beds. However, this figure covers both residential care and nursing homes. The spread of provision across London varies widely. The Lambeth-specific assessment in the SHMA 2017 provides data on need in Lambeth.
6. More detailed information about the level of provision in Lambeth is set out in the report from Liz Clegg, Associate Director Integrated Commission (London Borough of Lambeth & NHS South East London CCG – Lambeth Team ([EB112a](#))). This confirms that there is adequate nursing home provision in the borough to meet the needs of the population, supported by a detailed rationale.
7. The supporting evidence for this assessment is set out in the Care Quality Commission local authority area data profile for Lambeth 2019 ([EB112b](#)). See in particular the second graphs on pages 4 and 5, which show the higher level of existing nursing home provision in Lambeth per head of population compared to equivalent authorities (listed on page 34) and England as a whole. The graph on page 7 shows the declining rate of council-supported older people whose long-term support needs were met by a change of setting to a residential or nursing care. This reflects the policy emphasis on enabling independent living, despite the significant supply of nursing home beds available. This picture is further illustrated in the CQC’s London Regional Profile October 2019 ([EB112c](#)): see in particular the map on slide 13 showing stable nursing

home services in Lambeth; and that on slide 15 showing a slight increase in nursing home beds in Lambeth in the last year.

8. Council/NHS Integrated Commissioning service policy reflects the expressed wish of older people to remain independent at home for as long as possible, supported by a range of community-based re-ablement and rehabilitation services to support residents to remain as independent as possible. This is set out in Lambeth's Housing Strategy 2017 ([EB06](#)).
9. It appears that one of the assumptions made in the CSCB supplementary statement is that more nursing home beds are required to mitigate the risk of future home closures although there is no evidence in the report to support this assumption. It is a Council priority to ensure quality of care across all social care provision. Working with the Care Quality Commission (CQC) Lambeth officers have a responsibility to ensure good quality care for all care home residents and that will remain a priority rather than the need to build another nursing home.
10. The assertion in the CSCB supplementary statement at para 1.1.6 that "growth in demand for nursing beds will inevitably be stronger" is not correct. This does not take account of policy priorities and data on service delivery, so is unsubstantiated. The Council does not understand the percentages at paragraph 1.1.6(a).
11. There is a suggestion at paragraph 1.1.6(c) that existing supply is declining. This is not supported by the CQC evidence cited above. It also does not take account of the provisions in Local Plan Policy H8(b), which would not allow a loss of nursing home provision unless it was re-provided or demonstrated not to be needed (in consultation with relevant service providers).
12. There is no mention of a delivery model in any of the CSCB reports. There is reference to CSCB not being a conventional developer of nursing homes, however there is no detail of how care will be delivered and whether or not CSCB are proposing to run the home themselves or partner with another organisation. There are a considerable number of factors that need to be taken into account when operating a nursing home, which have not been addressed in the original report or this supplementary statement. CSCB makes frequent reference to providing quality care but there is no evidence to substantiate this given there is no information about how the care will be provided or by whom. This raises questions about the deliverability of the CSCB proposal.
13. CSCB make reference to Southwark Council's plans to build two new nursing homes in the borough. There is mention of a recent meeting with relevant senior officers from Southwark. However, Liz Clegg made contact with the Director of Social Care Commissioning in Southwark when she received the original CSCB report in late September 2020 and the Southwark Director informed Ms Clegg that she was not aware of any approach by CSCB. Southwark Council have undertaken a market engagement programme as part of the work they are doing to develop their own nursing home market. Given CSCB's assertion that this proposed nursing home would provide care for Southwark residents, Ms Clegg would have expected them to be more engaged with Southwark Council on this matter.
14. It is not guaranteed that neighbouring boroughs would choose to place in another borough especially if they are developing their own local capacity as is the case in Southwark.
15. Lambeth held extensive discussion with Southwark under the Duty to Cooperate, as set out in the Duty to Cooperate Compliance Statement ([PD07](#)). This resulted in an agreed Statement of Common Ground between Lambeth and Southwark ([SCG08](#)). At no point did Southwark raise the need for Lambeth to help meet their unmet need for nursing home accommodation.

**From:** ted inman [mailto:[ted.inman@blueyonder.co.uk](mailto:ted.inman@blueyonder.co.uk)]

**Sent:** 24 September 2020 16:04

**To:** L Clegg <[l.clegg@nhs.net](mailto:l.clegg@nhs.net)>

**Cc:** Gudrun Andrews <[GAndrews@lambeth.gov.uk](mailto:GAndrews@lambeth.gov.uk)>; 'Kathryn Moller' <[K.Moller@coinstreet.org](mailto:K.Moller@coinstreet.org)>; Catherine Carpenter <[CCarpenter@lambeth.gov.uk](mailto:CCarpenter@lambeth.gov.uk)>

**Subject:** RE: Gabriel's Wharf nursing home

Hi Liz

Apologies for the long delay since our earlier email exchange.

We now have the report we commissioned on the potential demand for CSCB's proposed nursing home which I attach and which we believe provides a positive basis for further discussion of CSCB's aspirations for its Gabriel's Wharf/Princes Wharf site.

We would very much like to meet you via Teams to discuss this - would it be possible for you to suggest some dates and times - Kat Moller, Iain Tuckett's PA, copied in, will respond on our availability. And for Gudrun and colleagues to indicate theirs - I am assuming they would want to be part of it.

I very much look forward to hearing from you.

Best wishes

Ted

Ted Inman

On behalf of Coin Street Community Builders

**From:** CLEGG, Liz (NHS LAMBETH CCG) <[l.clegg@nhs.net](mailto:l.clegg@nhs.net)>

**Sent:** 02 July 2020 14:57

**To:** ted inman <[ted.inman@blueyonder.co.uk](mailto:ted.inman@blueyonder.co.uk)>

**Cc:** 'Gudrun Andrews' <[GAndrews@lambeth.gov.uk](mailto:GAndrews@lambeth.gov.uk)>; 'Kathryn Moller' <[K.Moller@coinstreet.org](mailto:K.Moller@coinstreet.org)>; 'Catherine Carpenter' <[CCarpenter@lambeth.gov.uk](mailto:CCarpenter@lambeth.gov.uk)>

**Subject:** RE: Gabriel's Wharf nursing home

Dear Ted

I think it might be useful for us to have a conversation sooner rather than later to give the heads up with regards to the council's position on nursing homes as this is already a very well developed market in Lambeth.

Happy to discuss over the phone or teams

Kind regards

Liz

Liz Clegg

Associate Director – Integrated Commissioning, Adults

London Borough of Lambeth &

NHS South East London Clinical Commissioning Group

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**From:** ted inman [<mailto:ted.inman@blueyonder.co.uk>]

**Sent:** 02 July 2020 13:37

**To:** CLEGG, Liz (NHS LAMBETH CCG)

**Cc:** 'Gudrun Andrews'; 'Kathryn Moller'; 'Catherine Carpenter'

**Subject:** RE: Gabriel's Wharf nursing home

Hi Liz

Many thanks for coming back to me.

We are just in the process of gathering in some relevant information and will then be in touch about a date. It might be a week or two.

Best wishes

Ted

Ted Inman

On behalf of Coin Street Community Builders

07860 318784

**From:** CLEGG, Liz (NHS LAMBETH CCG) <[l.clegg@nhs.net](mailto:l.clegg@nhs.net)>  
**Sent:** 29 June 2020 11:55  
**To:** ted inman <[ted.inman@blueyonder.co.uk](mailto:ted.inman@blueyonder.co.uk)>; 'Catherine Carpenter' <[CCarpenter@lambeth.gov.uk](mailto:CCarpenter@lambeth.gov.uk)>  
**Cc:** 'Gudrun Andrews' <[GAndrews@lambeth.gov.uk](mailto:GAndrews@lambeth.gov.uk)>  
**Subject:** RE: Gabriel's Wharf nursing home

Dear Ted

Can you please get back to me with some suitable times for us to catch up

Kind regards

Liz

Liz Clegg

Associate Director – Integrated Commissioning, Adults

London Borough of Lambeth &

NHS South East London Clinical Commissioning Group

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**From:** ted inman [<mailto:ted.inman@blueyonder.co.uk>]  
**Sent:** 28 June 2020 12:04  
**To:** 'Catherine Carpenter'  
**Cc:** 'Gudrun Andrews'; CLEGG, Liz (NHS LAMBETH CCG)  
**Subject:** RE: Gabriel's Wharf nursing home

Thanks Catherine.

We will pick this up.

Best wishes

Ted

**From:** Catherine Carpenter <[CCarpenter@lambeth.gov.uk](mailto:CCarpenter@lambeth.gov.uk)>  
**Sent:** 15 June 2020 13:54  
**To:** ted inman <[ted.inman@blueyonder.co.uk](mailto:ted.inman@blueyonder.co.uk)>  
**Cc:** Gudrun Andrews <[GAndrews@lambeth.gov.uk](mailto:GAndrews@lambeth.gov.uk)>; L Clegg <[l.clegg@nhs.net](mailto:l.clegg@nhs.net)>  
**Subject:** RE: Gabriel's Wharf nursing home

Dear Ted,

We advise you to speak to Liz Clegg, Associate Director – Integrated Commissioning, Adults, London Borough of Lambeth & NHS South East London Clinical Commissioning Group. Liz is copied above and is expecting you to make contact via that email address (I have explained the context).

Kind regards

Catherine

Catherine Carpenter BA MA MRTPI

Head of Policy and Place-shaping

Sustainable Growth and Opportunity Directorate

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**From:** ted inman [<mailto:ted.inman@blueyonder.co.uk>]

**Sent:** 10 June 2020 15:38

**To:** Catherine Carpenter <[CCarpenter@lambeth.gov.uk](mailto:CCarpenter@lambeth.gov.uk)>

**Subject:** Gabriel's Wharf nursing home

Hi Catherine

I believe you were going to let us have the name of the right person for CSCB to talk to in the relevant part of the Council about need etc for the nursing home accommodation we are proposing.

I look forward to hearing from you.

Best wishes

Ted

Ted Inman

07860 318784

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