

20/12/2022

Ms. Ann Marie Farrelly
Chief Executive
Fingal County Council
County Hall
Main Street
Swords
Co. Dublin

Re: Stage 3 Documents Material Alterations to the Draft Fingal Development Plan 2023 – 2029 – CH 13.1

Dear Ms. Farrelly,

We write to you in relation to Stage 3 Material Alterations to the Draft Fingal Development plan in relation to CH 13.1 shown below to draw your attention to certain matters:

PA CH 13.1: Section 13.5 Zoning Objectives, Vision and Use Classes, page 452

Insert caveat 19 'For Public Operators Only' to the following uses in the Permitted in Principle category of the CI-Community Infrastructure zoning objective, 'Residential Care Home/Retirement Home' and 'Sheltered Accommodation'.

We believe the proposed material amendment is flawed and should not be accepted for a number of reasons which we would like to outline to you.

Nursing Homes in Ireland are regulated by HIQA and provided by public sector operators such as the Health Service Executive (HSE), voluntary bodies funded under sections 38 & 39 of the Health Act and private operators. Of the 31,867 beds available in the sector, 77% of these are provided by private providers. The Health Service Executive in its Capital Plans has only allocated resource to add 530 beds over the coming years, in some cases only replacing existing unsuitable facilities which will result in little to no net gain in capacity. These units being provided by the HSE are primarily located in areas where there is a need, but that need is commercially not viable for private providers – Ardee, Co Louth, Athlone, Co. Westmeath, Clonmel, Co. Tipperary, Killarney, Co. Kerry, Middleton, Co. Cork, Thomastown, Co. Kilkenny.

The Minister for State for Older Persons Deputy Mary Butler acknowledged in Dail exchanges last month that the hybrid model of public, private and voluntary operations in the nursing home sector is a feature of our free market economy. Both experience and evidence shows that the HSE has no desire to operate further nursing homes in areas such as Fingal where private providers can successfully do so.

The need for nursing homes and integrated retirement communities is growing exponentially and will continue to grow. Older persons now make up 13% of our population and by 2026 will have

grown to 16% of population. The Fingal area will come under increasing pressure to meet the needs of its ageing population. Whilst it is the desire of a majority of older person to age in place at home, as evidenced in the Fingal Age Friendly Strategy, it is the reality that 4.5% of this growing population cohort will require long-term care in nursing homes. By 2026, there will be an expected shortfall of 5,500 beds in the nursing home sector creating serious challenges to meet the needs of older people in Fingal and nationally.

Irregardless of whether the operator of a nursing home is a private entity or a public entity, the vast majority of residents (>90%) will access services through the Nursing Home Support Scheme allowing the resident to choose the nursing home of their choice, in the location of their choice without cost a direct impact on the resident. The National Treatment Purchase Fund negotiates the rate payable between a private nursing home operator and the HSE for the provision of services to an older person under the Nursing Home Support Scheme. The average rate payable under the scheme to a provide provider is €992.00 per resident per week compared to the cost of €1616 per resident per week residing in a HSE facility. This further underlines the HSE's strategy to facilitate the best use of state resources by allowing private providers to lead wherever possible noting that the standards of care and regulatory regime imposed by HIQA is the same for both. Private Nursing Homes provide high-quality person centered care in a cost effective manner for the state.

In summary:

- The HSE are unlikely to develop a Residential Care Home or Sheltered Accommodation in an area where it is commercially viable for a private operator to do so.
- The current HSE capital plan does not include a provision for building any public Residential Care Home's in the Dublin Region or within Fingal County areas.
- The need for Residential Care Homes and Sheltered Accommodation is expected to exponentially grow in the coming decades as this population cohort grows.
- Privately operated nursing homes provide exceptional value for money to the state whilst adhering to the same quality standards regulated by the Health Information and Quality Authority (HIQA).
- From the older persons perspective, the nature of the provision (public vs private) is of little consequence and the hybrid market facilitates choice for older persons funded publicly through the Nursing Home Support Scheme.
- The proposed Material Alteration outlined in CH 13.1 will have the effect of excluding a private operator from developing a much needed Residential Care Home within the zoning area further constraining a resource that is increasingly in demand.
- The proposed amendment to permitted uses is not in the best interests of either the state or nor the public by reducing the supply of suitable sites.



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Yours Sincerely,

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