

# mr barnaby collins comments

Page: [Policy H15 Specialist older persons housing](#)

Section: [N/A](#)

There is an apparent inconsistency with the proposal to state at part C that extra care accommodation is to be considered as Class C3. The authority on land use classification is the Use Classes Order that refers to C2 as comprising "*residential accommodation and care to people in need of care*". This, by definition, clearly includes extra care.

It is acknowledged that specialist older persons housing is a rapidly evolving sector of the market, and some providers may propose very little care, but it is unhelpful to place all extra care types of operation in the same, and potentially wrong, boat. By way of a worked example, dementia is unfortunately a very common ailment of older people and it is most likely that extra care providers will inherently include a dementia treatment and management specialism, even if not necessarily operating as a dementia specialist, and so should be defined as C2. In the end, it is best to define the use class (C2 or C3) on the basis of the circumstances of each case.

Page: [Policy H15 Specialist older persons housing](#)

Section: [4.15.3](#)

It is wrong, per 4.15.3, to define C2 and C3 by means of self-containment and it has no sound basis. Self contained accommodation is a means of providing a development where occupiers can receive care, including end of life care, **within their own homes** and in the case of a flat development it is very odd to define land use classification by whether an occupier has their own front door (i.e. is self contained or not). The most logical definition/qualification should be the level of care provided where none = C3 and clearly defined levels of care = C2, not a very detailed design matter such as self containment.