

**David Holmes**

### **Class C2 designation**

The Applicant has made a number of claims within the Planning Statement relating to the 23 properties, described on the application as Assisted Living Units. These are contradictory and misrepresent the facts.

*1. Clause 6.22b: “the proposal does not include general market housing”*

**The management company, Cognatum, has confirmed these properties are to be sold with a 10 year warranty with a 999 year lease.** These are luxury properties and described as providing contemporary living for the lifestyle of the new active generation of retirees, to provide independence, privacy and security.

The Government issued guidance in June 2019 to assist local authorities in the definition of housing for older and disabled people. Housing designed for people aged 55 and over, and the active elderly, having shared amenities, but not including support or care services, is defined as **Age restricted general market housing**. The element of care is defined in Regulation 2 Health and Social Care Act 2008 Regulated Activities.

This definition is supported by AgeUK, which confirms that ALUs require a level of personal support through an onsite agency registered through the Care Quality Commission. **There is no indication of a partnership with a care agency.**

*2. Clause 4.1:* states “The provider of the ALUs is Cognatum Estates, a company that specialises in the provision of extra care housing.

### **The Cognatum website confirms they do not provide personal care services**

Cognatum, have confirmed in their letter of 28/11/19 the ALUs are intended for occupation by those who do not yet need intensive nursing care and support.

The Applicant states that where no medical care is provided, care can be provided such as a handyman and gardening services. **The justification of C2 class is the provision of personal care required.**

*3. Clause 4.4:* states “the overall development package has been accepted on the reliance of facilities and services being provided from the nursing home in support of the ALUs

The facilities and services offered by the Care Home are limited to a hair salon and being able to share the dining experience with the care home residents. **There is no provision of the fitness and wellness suite indicated within the Cognatum submission, and the Applicant has confirmed there is no intention to hold any day care, healthcare or activity groups at the Care Home.**

**The Applicant has confirmed the ALUs are not reliant on the relationship with the Care Home to justify C2 status, and, there is no requirement for the owners of these properties to commit to any contractual obligation with the Care Home.**

In summary, the advantages of Class2 designation for a developer are twofold, one, to mitigate the substantial contribution to the local authority, and two, such schemes are not bound by the planning policy constraints of Class 3 housing.

The conflicting statements within this Application confirm the residential properties do not meet the criteria of Assisted Living Units and do not justify Class 2 designation.