

Consultation Statement for the South Worcestershire Affordable Housing Supplementary Planning Document

Summary of responses to the draft Affordable Housing Supplementary Planning Document (SPD) formal consultation 2026

In connection with the preparation of the Affordable Housing Supplementary Planning Document (Affordable Housing SPD), a Consultation Statement is required to demonstrate with whom the three South Worcestershire Councils (SWC), comprising Malvern Hills District Council, Worcester City Council, and Wychavon District Council, consulted and how they engaged with local people and other interested parties during the preparation of the Affordable Housing SPD.

The Affordable Housing SPD supports policies in the South Worcestershire Development Plan Review 2021 – 2041 (SWDPR), adopted on 26 March 2026.

In accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, this Statement confirms that representations were made to the SWC in respect of the draft Affordable Housing SPD.

This Statement contains the following information:

- A summary of the individuals and organisations with whom the SWC consulted
- How those individuals and organisations were consulted
- A summary of the issues raised, and how those issues have been addressed in the amended Affordable Housing SPD.

A five week public consultation on the draft Affordable Housing SPD commenced on 30 March and closed at 5:00pm on 30 April 2026. The consultees were notified by email, social media posts, and webpage news announcements. Paper copies of the draft Affordable Housing SPD, the evidence base documents, the Consultation Statement of Representations Procedure, a 'plain language' Consultation Information Sheet and consultation response forms were available from libraries in Malvern, Tenbury Wells, Upton upon Severn, Worcester (The Hive), St Johns, Warndon, Pershore, Evesham, Droitwich Spa, and Broadway, as well as The Guildhall in Worcester and the Civic Centre in Pershore.

These consultation documents were also published on the South Worcestershire Development Plan (SWDP) website and each of the constituent SWC websites with a link to the online consultation survey. Comments on the draft Affordable Housing SPD were invited either directly to the SWC by email or paper response form, or through the consultation survey.

Approximately 1,070 statutory consultees and other organisations/ developers/ individuals on Consultee Database were notified.

The draft Affordable Housing SPD was taken to the committee and council sessions listed below to allow councillors to scrutinise the documents, ask questions, make minor modifications and for the SWC to seek authority to consult:

- Executive Committee meeting at Malvern Hills District Council – 17 March 2026
- Place and Economic Development Committee at Worcester City Council– 16 March 2026
- Executive Board meeting at Wychavon District Council – 25 March 2026

There were 18 representations made to the draft Affordable Housing SPD, with 16 representations made via email and 2 representations made via the online survey form. All of the representations were made in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The SWC have had regard to all relevant and duly made representations in the preparation of the final SPD presented for adoption to each Council.

The following organisations and individuals responded:

Statutory Consultees	Historic England, Environment Agency, The Coal Authority, National Highways and Worcestershire County Council
Developers and Planning Agents	Savills, PPS on behalf of Robert Hitchins, Montague Evans on behalf of Summix and Homes England, Planning Issues Ltd on behalf of Churchill Living and McCarthy & Stone, Pegasus Group on behalf of Bellway Homes, LRM Planning Ltd on behalf of Bloor Homes and Tetlow King on behalf of West Midlands Housing Association Planning Consortium
Parish/Town councils, Community Groups, Residents and other interested groups	Holt Parish Council, Pershore Town Council, Whittington Parish Council, Community Campaigner for Civic Heritage, Little Malvern and Welland Parish Council and Malvern Hills National Landscape Partnership

Six consultees indicated support for or made no specific comments on the draft Affordable Housing SPD. A summary of the key issues raised by the remaining 12 consultees and the SWC response is provided below.

The main issues arising from the representations are:

- Reference MHNL and CNL Management Plans and other relevant guidance such as their Housing Position Statements
- Clarify that additional criteria apply for sites that fall within villages that are wholly or partly within the Cotswolds or Malvern Hills National Landscapes (align with SWDPR policies)
- Give greater emphasis for Renewable Energy in affordable housing
- Accept Parish Housing Needs Assessments and use of an Registered Providers internal housing management data in informing the appropriate mix of affordable housing on any development site
- Acknowledge that NDSS, M4(2) and M4(3) standards increase costs and can impact viability at scheme level, including on 100% Affordable Housing schemes
- Not be prescriptive regarding Affordable Housing mix but require flexible approach
- Recognise that form and content of S106 agreements should be a matter of negotiation and should reference a Registered Provider Cascade Mechanism
- Recognise that early phases of Wychavon Town may require a different tenure split to 70/30 to ensure deliverability and permit flexibility in tenure, subject to intention for long term compliance
- Recognise that early phases of Wychavon Town likely to be infrastructure cost heavy and therefore allow Viability Assessments to be submitted within 12 months of planning permission being granted
- Acknowledge that specialist housing for older people has its own viability issues and therefore may not be able to meet the requirements for Affordable Housing
- Include more information on the Housing Accord
- Delete reference to ‘substantial’ in para 3.37 (in reference to Affordable Housing being sold by developers to registered providers at a “substantial” discount on the market price) as is subjective
- Reference mortgagee exclusion clauses in Appendix 3
- Ensure that land costs are not underestimated in off-site calculations, align the build costs and also clearly factor in developer profit in Appendix 4
- Ensure applicants are no worse off with an off-site contribution and not introduce formulas that are not set out in the SWDPR
- Not increase the amount of Affordable Housing sought above the SWDPR policy requirements where Affordable Housing cannot be provided on-site, either on an alternative site or via off-site financial contribution
- Clearly confirm how Designated Protection Area waivers will be applied in practice

Refer Appendix 1 for further details of the consultee responses and the SWC response to the comments.

All respondents requested to be notified of the adoption of the Affordable Housing SPD by the SWC.

Appendix 1 to Consultation Statement for the Affordable Housing SPD

Consultation responses and SWC responses

Summary of comments made on the draft Affordable Housing SPD (2026) and the SWC response.		
Nature of Comment	Comment	SWC response
General	Energy bills continue to rise and it is critical that renewable and low carbon energy should have greater emphasis in the design of affordable housing to enable people to afford to live in them. Suggests preference for solar PV on affordable homes.	Agreed. Para 4.3(a) amended to read: 'As a minimum, the criteria of Policy SWDPR 37 Renewable and Low Carbon Energy should be met but opportunities to maximise the use of appropriate renewable and low carbon energy for affordable housing, such as solar PV panels, will be welcomed to ensure that future occupiers benefit from these greener and cheaper to run forms of energy.'
General	Provision of affordable housing in rural villages is key to encouraging both younger people to stay in the village and new families to move in. Preference should be for on-site provision and neither on an alternative site nor off-site financial contribution should be the norm.	Noted. For housing schemes of 5 or more dwellings, both policy SWDPR 19 and the AH SPD prioritise on-site provision of affordable housing.
General	Despite the inclusion within the SWDPR vision that affordable homes should help to 'secure and sustain local communities, services and facilities' - it is not felt that this is currently reflected in this SPD. It would be preferable to see this wider community sustainability opportunity outlined and promoted further through this SPD.	Agreed in part. Para 2.11 added: 'The provision of new affordable housing will provide new accommodation for those in housing need, including for rural sites, those with a local connection. In turn this will help to sustain local communities, services and facilities.'
General	Add reference to South Worcestershire Development Plan Review 2021-2041 as a key document.	Agreed. Added to para 2.3 and Appendix 1.

General	Should reference the role Wychavon Town will play in delivering much needed homes including affordable homes across the Plan period; recognise that it requires a significant amount of infrastructure that may give rise to a different housing mix and clarify that policy SWDPR 19 should be read alongside SWDPR 55.	Agreed in part. Para 3.1 amended: In addition, the individual policies for strategic sites, e.g. SWDPR 55 Worcestershire Parkway, and other sites with their own allocations policy, e.g. SWDPR 58 Cales Farm, also include a requirement for the provision of affordable housing (generally at 40%) and other infrastructure, and should be read alongside Policy SWDPR 19.
General	It is important to recognise that evidence of need will change over time; affordability will change and type and mix will be influenced as those housing types where the greatest need presently exists is addressed. A flexible approach needs to be taken therefore which reflects spatial and temporal considerations. The wording of the SPD should not preclude that flexibility in the negotiation of planning obligations in due course.	Noted. No change, the SPD does not preclude flexibility from negotiation where appropriate.
General	Delete 'substantial' in Paragraph 3.37, regarding discount applied to affordable housing in transfer of affordable housing, as it is subjective.	Agreed, 'substantial' deleted and replaced with 'at <u>an agreed</u> discount'
General	Note that on 25 November 2025, the Council agreed to waive restrictions associated with Designated Protected Areas (DPAs) on Shared Ownership properties in defined circumstances, including within Category 1 - 3 settlements and Strategic Sites. DPAs are typically applied to shared ownership homes in rural areas to restrict	Agreed. Amend para 3.19 to include the following wording: In rural areas, where it is agreed that the affordable housing is provided as shared ownership, the council may accept <u>will support waiving the associated</u> Designated Protected Areas (DPA) waiver <u>restrictions on shared ownership homes if the site is either within a Strategic Allocation or is within a</u>

	staircasing to 100%, ensuring that properties remain available as affordable housing in perpetuity. It would be helpful for the Affordable Housing SPD to clearly confirm how DPA waivers will be applied in practice. This would provide greater clarity and certainty for applicants, RPs and funders, particularly in structuring schemes and securing finance.	category 1, 2 or 3 settlement, as defined in SWDPR 03. <u>This which means that the householder could staircase to 100% ownership and therefore the property would not remain as an affordable home. This approach will not apply to Rural Exception Sites where all affordable units will remain affordable in perpetuity regardless of tenure. This approach will be subject to a review and the council reserves the right to revert back to their original stance on DPA waivers should there be any negative unintended consequences of this approach. Further details on how DPA waivers are applied can be found in the respective reports at Removing barriers to developing new affordable housing Designated Protected Areas and Shared Owners.pdf (Wychavon) and Removing Barriers to Developing New Affordable Housing - Designated Protected Areas and Shared Ownership Housing (Malvern Hills)'. Further information on legal agreements is contained in Appendix 3.</u>
General	It would be helpful for the SPD to encourage developers to have early active engagement with Housing Associations in the preparation of planning proposals.	No change. This is already covered in para 3.27 (now 3.28).
% Affordable housing	Significant concerns regarding the deliverability and genuine affordability of affordable housing and the level of affordable housing sought – should be 60%, like Tewkesbury is proposing to seek.	Noted. Policy SWDPR 19 sets out the % of Affordable housing to be sought and cannot be changed via the SPD because SPDs are not permitted to set new policy.

Shared Ownership	Shared ownership homes are reportedly increasingly difficult to deliver and take up. Clarification is sought on how this issue will be addressed to ensure that the needs of local people are genuinely met. Requires a more ambitious and clearly articulated strategy.	Noted. There is an acute need for social rented affordable housing as this is most affordable to those in housing need so policy 19 proposes 70% of new affordable homes on schemes should be for social rented. The remaining 30% of the units are to be for affordable home ownership which, the NPPF states, may include shared ownership but also includes discounted market sales housing, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Therefore, there are a range of options for affordable home ownership if shared ownership is not considered appropriate for a particular site.
Heritage Assets	Engaged with SWDPR examination and is aware of the provisions for heritage buildings set out in SWDPR 17 and note that the draft SPD acknowledges the provisions too. Also note the information relating to financial contributions and viability which is helpful and may assist in cases which involve heritage assets.	Noted.
Evidence of Affordable Housing Need	Appendix 1 should be amended to reference Parish Housing Needs Assessments (using secondary data) and not just Parish Housing Needs Surveys. Recommends that the Council supports the use of an RP internal housing management data in informing the appropriate mix of affordable housing on any development site.	Noted, no change. Primary data is considered more reliable than secondary data, although it is acknowledged that both are a snapshot in time. It would be inappropriate, therefore, for the SPD to actively encourage the use of secondary data or RP internal housing management data but applicants are not precluded from submitting these forms of data should they wish to do so.

Design of Affordable Housing	Amend para 2.23 to advise Registered Providers may be unwilling to take on sheltered schemes or dwellings with lifts. Amend para 4.3(a) to explicitly include the exceptions in policy SWDPR 17 where NDSS, M4(2) and M4(3) will not be required. Concern that the recommended clustering of affordable housing will be interpreted by development management officers as a fixed requirement which could unduly constrain scheme design and limit the scope for site-specific circumstances and reduce flexibility when designing layouts. It should also not apply to 100% AH schemes. Recommends clustering of Affordable rent, social rent and intermediate tenures as each have different management requirements, allocation criteria or funding arrangements, and it can therefore be beneficial for these homes to be grouped logically within a scheme.	Noted but this does not need to be referenced in the AH SPD. Agreed in part. Para 4.3(a) amended to align with Policy SWDPR 19: 'Where step-free access is demonstrated not to be feasible, these Part M requirements will not apply. Other exceptions to these Part M requirements may include when a proposal has Listed building constraints or site-specific factors such as vulnerability to flooding, site topography or other constraints.' Agreed in part. Para 4.3(d) amended to read: '<u>With the exception of 100% affordable housing schemes, clusters of up to 10-12 dwellings usually work well, but this will depend on management practices of the Registered Provider, and site-specific requirements of the housing scheme. It may also be helpful to cluster by affordable tenure because social rent and intermediate tenures have different management practices.</u>
Viability	Amend para 3.5 to advise that requirement for NDSS, M4(2) and M4(3) all increase costs, affect layout and can impact viability at scheme level.	No change. The viability evidence underpinning the SWDPR is required by national policy to be proportionate, area wide and high-level, rather than

	Some schemes face genuine viability, funding and site-specific constraints which can make full NDSS compliance difficult to achieve without affecting scheme deliverability. A degree of flexibility is particularly important for 100% affordable housing schemes, where there is no market housing to cross-subsidise additional costs. This is recognised by Homes England who have historically allowed flexibility for grant-funded affordable housing to be delivered below 100% NDSS where this is justified. Amend para 5.22 to state that viability assessments will not ‘generally’ be accepted in the first 12 months Amend para 5.24 to distinguish between large phased sites where deferred obligations may be appropriate in certain circumstances and smaller, quicker developments where deferral would be inappropriate. Welcomes reference to viability issues in the AH SPD (page 19) as significant infrastructure is required at Wychavon Town which will impact on viability. Welcomes the recognition within Section 5 that viability is central to the planning process, and that planning obligations must be considered on a case-by-case basis.	a detailed appraisal of every possible site, tenure, or development scenario. The purpose of the evidence is not to demonstrate that all development will be viable in all circumstances, but to inform whether, in the round, the proposed policies would put the overall delivery of the development plan at serious risk. This was found not to be the case. Agreed. Para 5.22 amended. Agreed. Para 5.24 amended. Support noted. Support noted.
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	In practice, viability pressures remain significant and can directly affect delivery. For example, where sites are subject to abnormal costs or constraints (such as ground conditions), or where parts of a site become undevelopable, schemes may struggle to meet full policy requirements. This reinforces the need for flexibility in applying policy requirements and planning conditions. Suggest amend para 3.37 to reflect that more viable products may be preferred in earlier phases of Wychavon Town, regardless of whether this reflects local need or 70/30 tenure split, and that flexibility in tenure mix is acceptable. Supports SPD's acknowledgement of other planning obligations in para 5.11 and recognition that the viability of sites may not be able to meet the full policy and infrastructure requirements of the Plan in para 5.15. Concerned about planning obligations on development and how these rates impact on specialist housing proposals for older people and the lack of clarity at present as to how the cumulative impact of these requirements impact on the viability of housing for older people in particular.	No change. Para 5.15 already states:. It is also recognised that the viability of individual sites are affected by a range of factors, and thus there may still be particular proposals that may not be able to meet the full policy and infrastructure requirements of the plan. No change. SWDPR 19 Part E already allows consideration of a different tenure mix where it can be demonstrated that the 70/30 mix is not viable or local need has demonstrated a need for a different affordable housing tenure for the site. Support noted. Noted. No change. Policy SWDPR 19 applies to new C3 units, which may be for older people and restricted as such, but is not applicable to non-C3 housing. In addition, Part G of the policy advises that viability assessments will need to be submitted where the proposal is not policy compliant in terms of affordable housing. The viability evidence
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	Given that the planning gain costs associated with the draft SPD requirements post-date any plan wide viability assessment on the council website, it would be beneficial if the council s might reconfirm that the cost expectations have been accurately assessed within the plan wide viability study. Cannot locate the results of any plan wide testing which demonstrates that the viability of older persons housing remains unchallenged. This would put the SPD at odds with the requirements of the PPG as referenced above. Premature to adopt the SPD without first clearly addressing the requirements of the PPG and ensuring that the ‘asks’ are financially viable. It should not be left to site specific viability testing to ensure that this requirement is met as the PPG is clear that the primary role for viability testing should be at the plan making level. By simply introducing these requirements without addressing the PPG viability requirement, the expectation of decision makers is that such requirements are always viable and deliverable. Regarding AH standards the SPD needs to ensure flexibility throughout to enable developments, such as land south of Worcestershire Parkway to respond to viability, market standards, as well as cascade provisions should affordable housing not be taken on by a registered provider.	underpinning the SWDPR is required by national policy to be proportionate, area wide and high-level, rather than a detailed appraisal of every possible site, tenure, or development scenario. The purpose of the evidence is not to demonstrate that all development will be viable in all circumstances, but to inform whether, in the round, the proposed policies would put the overall delivery of the development plan at serious risk. This was found not to be the case. No change. The applicant will need to provide evidence as to why the AH standards cannot be met. If developers are unable to secure an RP partner, they will need to contact the relevant council’s housing team with evidence to enable further discussion to agree a way forward. The councils
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	The SPD should refer to the notion of additionality and not preclude additional affordable housing which could be funded by grant thus providing a proportion that would not otherwise have been secured under the terms of the Section 106. This is a means for progressing schemes which are not viable with the proportion of affordable housing required by Policy SWDPR19 (i.e., there is a lesser amount of affordable housing secured via the Section 106, with separate grant funding enabling the shortfall to be met or exceeded). 100% affordable housing schemes are subject to cumulative policy requirements and cost pressures including higher build standards/costs, NDSS compliance, Building Regulation accessibility standards, funding limitations and wider infrastructure contributions can place considerable pressure on scheme viability. When combined, these factors can still place considerable pressure on scheme viability, particularly on 100% affordable housing developments where there is no cross-subsidy from market housing Advises that the government has signalled it will publish revision to its policy and/or guidance on viability. It is very possible that these extensive	wouldn't automatically agree to include a cascade mechanism. Noted. No change – this approach is not precluded by Policy SWDPR 19 or the Affordable Housing SPD. Noted. Noted. No changes required at this time.
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	passages of the SPD will be superseded very quickly. The Councils will want to reflect on this in terms of its timetable for finalising the SPD. It is noted that in high value areas such as Wychavon and Malvern Hills, affordability pressures remain acute despite strong market values. This reinforces the need to ensure that policy requirements do not inadvertently constrain development viability, particularly in relation to the delivery of affordable housing.	Noted.
Affordable Housing Mix	Amend para 4.3(b) that it is not always appropriate to provide a mix and type that is proportionately similar to the market mix. Amend para 4.3(c) to note that occupancy levels, dwelling type and 5 bedroom unit provision will be a matter for negotiation. Amend para 3.41 to note that affordable housing mix will be a matter for negotiation. Support the range of recommended dwelling mix set out in Tables ES1, ES2 and ES3 but recommend that this is clearly positioned as guidance rather than a prescriptive target to allow decision making to respond more effectively to site-specific and locally	Agreed. Wording amended to clarify that affordable and market dwellings should be visually indistinguishable. Reference to them having same mix of dwelling types has been deleted. Noted. SPD amended to state ‘generally, affordable dwellings should be designed to be occupied as follows...’ No change. Para 3.41 (now 3.42) merely states what the general affordable housing needs are. Agreed. Para 2.6 amended to read: The dwelling type and size required to meet this need by council area is provided in the following tables ES1 to ES3, <u>copied from the SHMA, but the site specific requirement will be informed by other evidence.</u>

	evidenced needs, which may justify a variation in tenure mix in certain circumstances. Would be grateful for greater flexibility on tenure splits where the scheme is 100% affordable Housing. For example, where there is an opportunity to include affordable rent alongside social rent and shared ownership in response to local need, viability and funding considerations. Criterion 4.3(c) should clarify that the requirement for 4-bedroom homes relates to properties suitable for occupation by seven or more persons.	<u>including the council's housing register (Housing For You).</u> No change, as this is already covered in Part H of Policy SWDPR 19 which states that proposals for 100% affordable housing schemes will be supported in principle provided they are of an appropriate scale, provide a suitable mix of housing sizes, types and tenures, and meet an identified local need. No change. The council's housing team advised these occupation levels.
Legal agreement - standard clauses	Suggests inclusion of a Registered Provider Cascade Mechanism. Amend Paragraph 4.2 because an applicant should not be required to have a Registered Provider as a signatory to the Section 106. Request that Appendix 3 includes reference to mortgagee exclusion clauses which would provide greater clarity and consistency for all parties involved in drafting legal agreements.	No change. If developers are unable to secure an RP partner, they will need to contact the relevant council's housing team with evidence to enable further discussion to agree a way forward. The councils wouldn't automatically agree to include a cascade mechanism. No change. The SPD does not require this it merely explains that it may be a possibility. No change.

Off-site affordable housing contributions	Amend paras 3.15 – 3.20 and Appendix 4 to remove approaches that result in a higher affordable housing contribution off-site than would apply on-site and which treat off-site and AH sites cumulatively to generate extra obligation. Amend Appendix 4 options to exclude requirement of commuted sums for partial units as a default. Appendix 4 should not introduce formulae and input assumptions that is not set out within policy SWDPR 19 nor create new policy requirements that should be included within the SWDPR. This approach is contrary to PPG because it is not included within the recently adopted local plan and therefore has not been examined in public and therefore cannot be included in an SPD. Commuted sums must be assessed in terms of costs and residual land value in order to be grounded in economic reality. Otherwise, what the council considers a compliant sum will generally be challenged through viability negotiation on a site by site basis. Also, need to make it clear that off-site and commuted sum approaches are not inflexible but a matter for negotiation and will not result in a cost to the developer that exceeds the on-site equivalent.	No change. The off-site contribution has been calculated to reflect that there will be more market homes on the site as a direct result of the affordable housing not being provided on the same site. Agreed in part. Appendix 4 has been amended in regard to the commuted sums for partial units to enable the developer to round up the amount of affordable housing if they wish to do so, to avoid the payment of an off-site financial contribution.' Policy SWDPR 19 and the SPD are clear that affordable housing should be provided on site – and this will be feasible in most cases. It is only where a robust justification exists, that off-site contributions may be accepted in lieu of on-site provision. It is therefore likely that this approach will only apply to a limited number of planning applications. Policy SWDPR 19 and the SPD recognise that in these cases, either the affordable housing should be provided on an alternative site or, where this is not possible, an off-site financial contribution would be sought. The off-site contributions for both of these options have been calculated to reflect that there will be more market homes on the original site as a direct result of the affordable housing not being provided on the same site. The viability evidence underpinning the SWDPR is required by national
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	The assumed land cost of £25,000 per plot appears to be understated and may not accurately reflect prevailing land values across South Worcestershire, particularly in higher-value areas. If land values are underestimated, this could result in off-site contribution rates that do not properly reflect the true cost of delivering affordable housing elsewhere. The build cost rate appears to differ between Option 3 and Option 4. It is not clear whether this is intentional or an error, and further explanation	policy to be proportionate, area wide and high-level, rather than a detailed appraisal of every possible site, tenure, or development scenario. The purpose of the evidence is not to demonstrate that all development will be viable in all circumstances, but to inform whether, in the round, the proposed policies would put the overall delivery of the development plan at serious risk. This was found not to be the case. The applicant may submit a viability assessment if the proposal is not financially viable and the affordable housing requirements cannot be met. Change. A range of between £20,000 and £25,000 was previously suggested for land cost per plot. It is now proposed that the lower land value is used instead because the proposed increase in off-site commuted sums was substantial compared with the 2016 AH SPD. The policy would be self-defeating if it led to a significant increase in the number of successful challenges on viability grounds leading to a considerable reduction in the commuted sums for affordable housing, especially as it mainly applies to small schemes of less than 5 dwellings in the Designated Rural Area where there are fewer opportunities for delivering new affordable homes. Change. The correct figure is £2,500 per sqm. Appendix 4 has been amended to reflect this. In addition, the 10% on-costs have been removed from
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	would be helpful to ensure the methodology is transparent and consistent. Finally, it is unclear how developer profit is accounted for within the calculation. It may be that profit is intended to sit within the on-cost assumptions, but this is not expressly stated. Given that developer return is a key component of scheme viability and land value, the methodology should clearly identify whether and how profit has been factored into the calculation.	the calculation as there was no clear justification for this to be applied. No change. The calculation does not take into account developer profit, it is instead based on physical build costs.
Malvern Hills National Landscape and Cotswolds National Landscape	Paragraphs 2.16-2.18. The SPD should also refer to the National Landscape Management Plans and to relevant National Landscape guidance, including Housing Position Statements. Paragraph 3.3 (Locations of affordable housing) Amend so that it mirrors the adopted SWDPR 20 wording, i.e. that the additional criteria apply to “sites falling within villages that are wholly or partly within the National Landscapes”. Paragraphs 3.12-3.20 (SWDPR 19: Meeting Affordable Housing Needs). Include Section F of Policy SWDPR 19, which states that proposals for settlements within or partly within the Cotswolds or Malvern Hills National Landscapes should have regard to relevant guidance produced by the CNL	Agreed. Agreed. Agreed.

	Board or MHNL Partnership, including housing position statements. The SPD should recognise that homes in protected landscapes are often unachievable for those on lowest incomes, and that National Landscapes are unlikely to be suitable areas to accommodate unmet needs from adjoining non-designated areas. Paragraph 3.50-3.51 (SWDPR 20 Rural Exception Sites): Amend para 3.50 to align with the wording of SWDPR 20: ‘For sites that fall within villages that are wholly or partly within the National Landscapes, applications will need to be supported by robust evidence of a local affordable housing need specific to the National Landscape settlement and, if necessary, to its neighbouring settlements within the National Landscape within south Worcestershire, such as a housing needs survey.’ Welcome that paragraph 3.51 is consistent with the Malvern Hills National Landscape Housing Position Statement and adopted SWDPR 20 in expecting rural exception sites to deliver 100% affordable housing, with up to 20% market housing only where viability evidence demonstrates that cross-subsidy is essential. For clarity, the SPD could also confirm that the affordable tenure mix within that 100% affordable	Agreed. Support noted. No change. The NPPF definition of rural exception sites applies regardless of whether the site is within,
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	provision should continue to be led by identified local need and the priority for affordable housing in perpetuity within the National Landscape. Considering Paragraph 3.50, it should be noted that the setting of a National Landscape is sensitive to development with past examples of inappropriate development evident adjacent to the Malvern Hills National Landscape that have resulted in a material visual effect on the quality of view from the National Landscape in addition to localised landscape and visual effects. Therefore, proposals situated just beyond, or in close proximity to, a National Landscape boundary should also be supported by an appropriate level of landscape assessment to inform decision making and detailed design appropriate to the setting of a designated landscape.	partly within, close to or outside the National Landscapes. Agreed. Para 3.50 (now 3.51) amended to read: 'Proposals <u>within the National Landscapes or those which affect their setting (refer Policy SWDPR 31 The Cotswolds National Landscape and Malvern Hills National Landscape)</u> should also be accompanied by.....
Location of Rural Exception Sites	The recognition that affordable homes must be within walking distance of local services is welcomed, acknowledging that access to vehicles may be limited. More emphasis could be given here on ensuring easy access, not simply just considering proximity. For example, consideration of attractive walking and cycling routes which encourage use.	Agreed in part. Para 3.44 (now 3.45) amended to refer to permanent well-designed and usually lit footpath.
Housing Accord	It would be helpful if the commentary provided at paragraph 2.19 is expanded upon further to explain to whom this requirement relates. This will also	Agreed. Amended para 2.19 to include the following wording: 'On Worcester South sites within Wychavon, this is currently achieved by allocating:

	ensure no scope for misunderstanding/unnecessary delays during the course of any planning applications. Should consider applying a similar approach to the housing accord to the new and future strategic sites.	90% of the affordable housing to households on the Worcester City housing register and 10% to Wychavon households. On Worcester West and Worcester South sites within Malvern Hills, this is currently achieved by allocating: 70% of the affordable housing to households on the Worcester City housing register and 30% to Malvern Hills households.' No change. This is already referenced in para 2.19
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