



Councillor C. Holley  
Convener, Service Improvement,  
Regeneration and Finance Scrutiny  
Performance Panel

**(VIA EMAIL)**

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*Please ask for:* Councillor David Hopkins  
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*Our Ref:* DH/JG  
*Your Ref:*  
*Date:* 9 July 2024

Dear Councillor Holley,

**Re: Scrutiny Letter to Cabinet Member for Corporate Services and Performance dated 1 Jul (Service Improvement, Regeneration and Finance - 11 Jun)**

Thank you for your letter received on the 1<sup>st</sup> July 2024 regarding the Audit Wales Report, Sustainable development? – making best use of brownfield land and empty buildings. The matter was the subject of a detailed discussion and Q & A session at the Service Improvement, Regeneration and Finance Scrutiny Performance Panel on 11 June.

Further to your invitation for comments on the issues and recommendations that you set out in your letter; I would make the following points:

**Request:**

- More information on the processes and detailed analysis that identifies and weighs up site viability of each individual site.

**Response:**

- I fully endorse the views expressed by Council officers that Swansea has been a leader in these matters, and that the Council has demonstrated an ambitious and proactive approach to delivering regeneration of brownfield sites through cross departmental collaboration and private sector partnerships. I note your reference to the Council's successful projects including the Penderyn Distillery at the Copperworks, the Palace Theatre and the Albert Hall.
- I await the response from the Welsh Government to the question that has been raised by Audit Wales as to whether changes to legislation are necessary to intervene in regenerating brownfield sites.
- I recognise and understand your concerns on the issue of how, when compared to greenfield sites, additional constraints can discourage bringing privately owned brownfield sites back into use, particularly those that give rise to significant



additional costs that can deter developers from delivering schemes on brownfield sites. In many instances there is a need for significant external funding to be obtained in order to bring sustainable development proposals forward, and the Council continues to be highly successful in working with partners to enable this.

- In regard to your request for more information on the processes and method of analysis used to weigh up the viability of individual sites, I would draw your attention to the comprehensive details provided on this matter on the Council's planning web pages regarding the Development Viability Model (DVM) assessment tool - <https://www.swansea.gov.uk/dvm> . The Council was a leading authority in the development of the DVM tool, which has enabled a pan- Wales approach comprehensive, user-friendly model that can be used by site promoters and decision makers for the purpose of assessing the financial viability of a development proposal. The DVM is a 'site-specific' appraisal tool that has been produced to work with Microsoft Excel for Office 365, running on Microsoft Windows. Further details on the specifications of the DVM are set out in a User Guide, which can be downloaded from the relevant planning webpages. The Council continues to make the DVM available to developers and site promoters for the purpose of undertaking a financial viability appraisal ("FVA") of proposed developments, and the model is also used by officers to assess the viability on planning applications and for informing LDP site allocations. The process of analysis using the DVM enables full consideration of all known costs associated with a proposed development. This includes Section 106 costs, all construction and infrastructure costs, any site-specific constraints that generate abnormal costs, the cost of and availability of finance, other costs such as fees and a contingency sum. It identifies the value expected to be accrued from the development taking account of costs and seeks to ascertain whether a proposal would generate a surplus sufficient to provide both an appropriately adequate profit margin for the developer and a land value sufficient to encourage a landowner to sell for the proposed use.

**Request:**

- Details of the viable brownfield sites that have been identified to date, for future inclusion in the LDP.

**Response:**

- In regard to your query for further details of the viable brownfield sites that have been identified to date for future inclusion in the LDP, I am happy to provide the very latest update to you on this aspect. A register of Candidate Sites submitted to the Planning Authority for consideration in the preparation of Local Development Plan 2 (LDP2), which will highlight whether sites have passed the initial 'Stage 1 high level sift assessment', will be published alongside the LDP2 Preferred Strategy in late 2024. This information will provide an initial high-level indication of the sites considered to have delivery potential and will highlight whether they are brownfield or greenfield sites. It should be noted that all sites that pass stage 1 will then go to a detailed level of assessment in subsequent stages of the agreed Candidate Site Methodology, which is published at <https://www.swansea.gov.uk/ldp2candidatesites> .

- Also, in relation to identifying potentially viable brownfield sites within settlements, a key aspect of the Swansea LDP2 evidence base will be an assessment of windfall development that has come forward in recent years in order to soundly estimate the contribution that windfall sites in the urban area will make to housing supply over the LDP2 plan period. A study is currently being prepared which will be published for consultation alongside the LDP2 Preferred Strategy, anticipated in late 2024.

Finally, I am pleased that you recognised in the letter that councillors are being encouraged to be part of the LDP2 formation process, and I hope you agree that a key mechanism for this is the cross party LDP2 Member Engagement Group. This group has already met on a number of occasions in 2024, and further sessions will be had as part of the LDP2 Preferred Strategy formation process. This will provide an excellent opportunity for members to engage with this particular issue through their political group representatives, and any information regarding the identification of brownfield sites within individual wards can be contributed via this group.

I trust the above addresses the additional points you have raised.

Yours sincerely



**Y Cynghorydd David Hopkins / Councillor David Hopkins**  
**Dirprwy Arweinydd / Aelod y Cabinet dros Wasanaethau a Pherfformiad**  
**Corfforaethol**  
**Deputy Leader / Cabinet Member for Corporate Services & Performance**