

Replacement Local Development Plan 2018-2033  
Background Paper

# BP17: Employment land supply



**Deposit Plan**  
**October 2024**



**Mae'r ddogfen hon ar gael yn Gymraeg hefyd.**

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## **1. Introduction and Scope of the Background Paper**

- 1.1 This is one of a series of Background Papers accompanying the Replacement Local Development Plan (RLDP). When the Council publishes its Preferred Strategy and Deposit Plan, it must explain how the policy has been formulated based on the evidence base available to the Council at the time. This Background Paper looks at employment land supply across the Conwy County Borough Local Planning Authority (LPA) area (which excludes Eryri National Park).
- 1.2 The main sections of this Background Paper include understanding the employment land need from data in the Conwy Employment Land Review (ELR) (Background Paper 18), information regarding the employment site inventory which includes details of existing safeguarded, allocated and office/industrial improvement sites within the Conwy LPA area, and a qualitative assessment of existing allocations including an understanding of quantities of land that is built-out, committed or remaining as undeveloped. Finally the report includes details of proposed new employment allocations to meet the need as identified in the ELR. While a list of proposed allocations will be included within this Background Paper, it should be noted that detailed candidate site assessments have been undertaken and documented separately. Please refer to Background Paper 6 - Site Deliverability.

## **2. National Planning Policy and Guidance**

- 2.1 Planning Policy Wales (PPW), chapter 5 states that planning authorities should ensure "...Planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level. Development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites of strategic and local importance."

2.2 Technical Advice Note (TAN) 23 – Economic Development states at paragraph 4.5.5; ‘The qualitative features of sites identified for employment should match current and future market requirements. Sites that do not have a reasonable prospect of being taken up for an employment use should not be identified for such use.’ Also paragraph 4.5.2; “Land provision targets may be higher than anticipated demand, to allow for the chance that the assessments are too low and to ensure that no opportunities are missed. They should also allow for flexibility, competition and choice. However, persistent oversupply of employment land may cause harm where the planned land supply exceeds demand, so that allocated employment sites remain vacant for long periods and frustrate development for other land uses.”

2.3 The importance in striking the correct balance in terms of levels of employment land is clearly referenced in both PPW and TAN 23.

2.4 Of particular relevance to this background paper is ‘Welsh Government Practice Guidance – Building an Economic Evidence Base to Support a Local Development Plan.’ This document advocates the production of site inventories to inform evidence base on employment land supply. It is the approaches and principles within this document that have been followed when producing the relevant RLDP employment/economy background papers.

### **3. Employment Land Need**

3.1 The ELR concluded that Conwy needs between 14ha and 20ha of employment land upto 2033. The target figure of 16.4ha of employment land has been chosen to be provided on a 65 : 35 split in favour of B1c B2 and B8 uses (light industrial, general industrial and storage) vs. B1 office use.

3.2 It is important to note that the 16.4ha is the target figure which includes a contingency buffer, however the range is evidenced between 14 and 20ha, so from an ELR evidence base perspective, any figure within this range is acceptable. This latter point must be caveated with the work that has been done to align housing growth with employment provision, for which the 16.4ha/1500 jobs target figure align with the 3600 plus contingency (4300) housing growth levels.

## 4. Site Inventory

### 4.1 Quantitative Land Supply

Every year commencing in April, the Strategic Planning Policy Service update their employment land inventory using information provided by the Local Land and Property Gazetteer (LLPG). This process catalogues (using a database, referred to here on after as the ‘Employment Land Database’) all the businesses that are situated within the main employment areas in the Conwy LPA area. These areas can be viewed on the LDP proposals map under “safeguarded office and industrial sites”, “safeguarded employment and improvement sites” “office and industrial improvement areas”, “employment allocations” and “employment contingency”. The database records the name of the business, planning use class, floor area/land area and also records and quantifies vacant land (plots) and buildings within these areas.

4.2 The key outputs from the Employment Land Database have been included in this background paper to inform the 2024 employment land supply figure, and determine the amount of new land that needs to be allocated within the RLDP. The first set of data to be considered is the total amount of floorspace that is currently occupied in the Employment Land Database study area. Table 1 shows the amounts and provides a percentage breakdown by use class:

**Table 1 - Employment land supply (currently occupied) 2024 – Headline figures**

<b>Occupied Floorspace by Type</b>	<b>Amount (Sqm)</b>	<b>Percentage of floor space overall</b>
<b>B1 Floorspace</b>	82,594.20	29%
<b>B2 Floorspace</b>	39,477.00	14%
<b>B8 Floorspace</b>	58,338.31	21%
<b>Sui Gen Floorspace</b>	62,481.92	22%
<b>A1 Floorspace</b>	17,187.46	6%
<b>D2 Floorspace</b>	2,696.93	1%
<b>Other Floorspace</b>	12,301.84	4%
<b>Mixed Use Floorspace</b>	9,937.31	3%
<b>Total</b>	<b>285,014.97</b>	<b>100%</b>
<b>Total Occupied Floorspace</b>	<b>(Ha) 28.5</b>	

- 4.3 We can see from the table above that the balance is mainly distributed between B1, B8 and Sui generis floor space.
- 4.4 Table 2 below quantifies all vacant land and buildings in the areas covered by the Employment Land Database, which includes undeveloped LDP allocations.

**Table 2 – Vacant land and units report 2024 - Headline figures**

<b>Type – Land or units</b>	<b>Amount</b>
<b>1 Undeveloped Sites</b>	(Ha) 9.93
<b>2 Undeveloped Plots</b>	(Ha) 21.65
<b>3 Total Undeveloped Land</b>	<b>(Ha) 31.58</b>
<b>4 Vacant Unit Floorspace</b>	(Sqm) 29525.68
<b>5 Vacant Units with No Address Point</b>	(Sqm) 3391.56
<b>6 Total of Vacant Floorspace</b>	(Sqm) 32917.24
<b>7 Total of Vacant Floorspace</b>	<b>(Ha) 3.29</b>
<b>Grand Total (line 3 plus line 7)</b>	<b>(Ha) 34.87</b>

4.5 Realistically, not all the land quantified in the above table will come forward for development in the RLDP. Some of the land is constrained and should not be included in the supply figure. In order to arrive at a true land supply figure, some qualitative assessment is required, starting with an appraisal of current undeveloped LDP site allocations.

#### **4.6 Qualitative Assessment of Employment Land and Adjustments to Headline data**

Table 3 below lists all the current LDP allocations and contingency allocations. In line with national guidance, a stringent approach has been applied whereby sites that haven't come forward, or show no signs of coming forward for employment development will not be re-allocated in the RLDP.

Table 3: Conwy LDP 2007-2022 Allocated Employment Sites Qualitative Assessment

Site	Designation	Size (ha)	Breakdown B1 (approx. sqm/ha)	Breakdown B2 (approx. sqm/ha)	Breakdown B8 (approx. sqm/ha)	Breakdown Sui Gen (approx. sqm/ha)	Breakdown Other (specify) (approx. sqm/ha)	Qualitative Assessment Carry forward to RLDP as supply?	Existing Allocated site	Existing Contingency site
<b>1.a) Abergele Business Park</b>	Allocated Site	2	1500 sqm	0	0	2500 sqm	Vacant NYS =0.82 ha	Yes, a relatively small amount of land remains undeveloped but will be classed as safeguarded supply as part of the wider site	Yes	
<b>2.a) Abergele south east</b>	Allocated Site	2					Vacant lost 1ha due to flood risk NYS = 1.0 ha	No- site is not financially viable without significant funding. Cannot demonstrate deliverability	Yes	
<b>2.b) Abergele south east</b>	Contingency Site	3					Vacant NYS = 3 ha	No- site is not financially viable without significant funding. Cannot demonstrate deliverability.		Yes
<b>14) Penmaen Road, Conwy*</b>	Allocated Site	0.5					Permission granted for original 0.5 ha	Yes site is now under construction/built-out.	Yes	
<b>17) Former goods</b>	Allocated Site	1.4					Vacant NYS = 1.4 ha	Not in totality – Most of the site	Yes	

yard, Builder Street.**							(1ha) has permission for housing, 0.4ha has planning permission for light industrial units.		
<b>20) Esgyryn***</b>	Allocated Site	9.8				D1 (School) = 2.7ha B1 =0.45 C3 = 5.28	Not in totality - The remaining undeveloped land is a mixture of land with permission for employment and housing. Existing office/industrial permissions will be counted as committed supply. The remaining land is land- locked by the WG offices and not included within the supply.	Yes	
<b>21) North East of former goods yard</b>	Allocated Site	0.4				Vacant NYS = 0.4 ha	No – site in council ownership. Has not been progressed so far due to delays	Yes	

								with developing the neighbouring Brickworks site. The site is within the settlement boundary so could come forward for development without allocation.		
<b>29.a) Land at Orme View Filling Station</b>	Allocated Site	0.5					Vacant NYS = 0.5ha	No. No known interest in bringing site forward for employment.	Yes	
<b>29.b) Land at Orme View Filling Station</b>	Contingency Site	0.5					Vacant NYS = 0.5ha	No. No known interest in bringing site forward for employment		Yes
<b>33) Site R5 off the B5105</b>	Allocated Site	1					Vacant NYS = 1.0ha	No. No known interest in bringing site forward for employment	Yes	
<b>34) Land at Memorial Hall</b>	Allocated Site	0.3					Vacant NYS = 0.3ha	No – As this site is brownfield and located within the settlement boundary it could come forward for development	Yes	

								without allocated status (subject to assessment of constraints i.e. flood risk) The site may be better suited to alternative uses and a B1/B2/B2 allocation may constrain future development of this site.		
<b>36) Site R44 Llangernyw</b>	Allocated Site	0.3					Vacant NYS = 0.3ha	No. No known interest in bringing site forward for employment	Yes	
<b>37) Land at Llansannan</b>	Allocated Site	1					Vacant NYS = 1.0ha	No. No known interest in bringing site forward for employment	Yes	
<b>Total existing allocated to be carried forward to RLDP:</b>							<b>0ha</b>			

\*Penmaen Road site was allocated as mixed use B1 and housing, however, the housing element is no longer feasible. Various planning applications have been submitted for this site for an Industrial Park, the total area with permission for B class use is now **2.4ha**. This is counted in Table 4 below.

\*\* Former goods yard, Builder Street 0.4ha committed land has been counted in Table 4 below.

\*\*\* Esgyrynn 0.12ha committed land, (minus recent B class losses) counted in Table 4 below.

**Total Existing LDP Allocated Sites to be carried forward to the Replacement Local Development Plan: 0 ha (note that as stated above any commitments and completions on these sites since 2018 will be counted as supply –see Table 4 below.)**

**Table 4 –Relevant planning permissions for B1, B2, B8 use and losses of B1, B2, B8 since 2018.**

Planning Reference	Location	Use class	Size in ha /Sqm	Site included as a gain	Site included as a loss
0/44106	Glan Y Mor Road (Arriva/NWWN)	Erection of supermarket	Loss of 1.3 B1/B2/B8		Yes
0/44795	Penmaen Road, at Conwy	B1, B2, B8	Gain of 1.9 hectare (allocated site but for 0.5 ha in plan)	Yes	
0/45327	Unit 2 The Creamery Business Park, Mochdre	B1/B8 to D2 Change of use to Gym.	Loss of 0.03ha		Yes
0/47133 & 0/47926	Land adj Royal Welsh Way (Esgyrynn)	Erection of 6 no industrial Units Including a new access road and car parking with cycle storage and	Overall gain of 0.12 ha B1	Yes	

	Llandudno Junction, Conwy	bin store facilities. (Later amended to 4 units)			
<b>0/47294</b>	Unit 9, Pensarn Industrial Estate Pensarn Promenade Road, Pensarn	Demolition of part industrial unit and offices. Construction of new industrial unit, office and parking	Gain of 0.02ha of B1	Yes	
<b>0/47588</b>	Cader House, Cader Avenue, Kinmel Bay	Demolition of 3730m2 of B8 and B1 floor space to form yard and hardstanding and change of use.	Gain of 0.16ha B1,B2, B8.	Yes	
<b>0/47438</b>	Land adj. to Linney Cooper Builder Street Llandudno	Proposed erection of 2 no. industrial buildings providing 7 no. units for B1/B2/B8 use, together with improvements to an existing access and other associated development.	Gain of 0.14 ha B1,B2,B8	Yes	
<b>0/47681</b>	Land of Tir Llwyd Enterprise Park, Kinmel Bay.	Formation of secure individual open air storage and yard compound facilities for rent	Gain of 0.19ha B8	Yes	
<b>0/47843</b>	Orme House, Blackmarsh Road, Mochdre (Mochdre Commerce Park	Change of use from Sui Generis to Class B8 (Storage or Distribution)	Gain of 0.06ha of B8	Yes	
<b>0/46932</b>	North Wales Business Park 8 Cae Eithin Abergele	Change of use from B1 to D1.	Loss of 0.01 ha of B1		Yes
<b>0/47093</b>	Unit 4 Llanfairfechan Industrial Estate Llanfairfechan	Time extension of temporary change of use B8 to D2	Loss of 0.01 ha of B8		Yes
<b>0/47182</b>	Peel Street Business Centre, Unit A3 Peel Street Abergele.	Proposed change of use of building from an industrial unit into a gymnasium (use class D2).	Loss of 0.03ha of B8		Yes

0/47596	Branwen, 5 Tir Llwyd Enterprise Park, Kinmel Bay, Conwy, LL18 5JA	Construction and operation of two B8 warehousing units	Gain of 1.08ha of B8	Yes	
0/48625	Riverside Business Park Benarth Road Conwy LL32 8UB	Extensions, alterations and Change of use from tank structure to form offices (B1 use) and storage.	Gain of 0.02 ha of B1	Yes	
0/48841	Unit 19 Tal Y Sarn Llandudno Junction LL31 9PW (Tre Marl 3)	Erection of new 2.4m high black palisade fencing to form new segregated service yard compound.	Gain of 0.01ha of B8	Yes	
0/48989	Threeways Garage Faenol Avenue Abergele LL22 7HT	Proposed workshop, customer reception, offices and storage space	Gain of 0.07 ha of B2	Yes	
0/48832	240 Conway Road, Mochdre, Colwyn Bay, LL28	Change of use of land to retail of timber materials and garden furniture including the erection of an open-sided timber storage building and the stationing of a small portable office and laying out of parking facilities	Gain of 0.08 ha of B1	Yes	
0/49232	Land to the South West of Nebo Road Llanrwst Conwy	Construction of light industrial unit on land at Cae Melwr	Gain of 0.02 ha of B1	Yes	

0/48834	North Wales Business Park, Unit 5430 Cae Eithin Abergele LL22 8LJ	Change of use from B1 (Office) to D1 - Ophthalmology surgery	Loss of 0.02ha of B1		Yes
0/48096	Land Adjacent to Llandudno train station Oxford Road / Builder Street Llandudno LL30 2AF	Outline approval for 5no Light Industrial Units - B1 Class Employment Use	Gain of 0.4ha of B1	Yes	
0/49689	Pensarn Trading Estate Lloyds Caravan Sales Co Ltd Promenade Road Pensarn Abergele LL22 7PW	Continued use of land for siting of storage containers	Gain of 0.38ha of B8	Yes	
0/49580	Plot 1 Mathonwy Tir Llwyd Enterprise Park Kinmel Bay Conwy LL18 3JH	Proposed warehouse for storage and distribution of wines, spirits, beers and soft drinks. Included in the warehouse are offices, off-licence and services	Gain of 0.09ha of B8 (with ancillary B1)	Yes	
0/49610	Stands Out Blackmarsh Road	Proposed linked extension to Stands Out and Riverside	Gain of 0.03ha of B2	Yes	

	Mochdre Colwyn Bay LL28 5HA	Buildings with alterations to front elevation of Stands Out			
<b>0/50774</b>	Units 1-4 Cae'r Llynen Esgyrynn Llandudno Junction LL31 9RT	Change of use of existing business units to charity donation centre with ancillary shop	Loss of 0.1ha of B1/B8		Yes
<b>0/50859</b>	Station Yard, Unit 8 Station Road Llanrwst LL26 0EH	Extension to existing maintenance workshop	Gain of 0.02 sqm of B2	Yes	
<b>Net additional floorspace</b>					<b>3.79ha</b>

4.7 The results from Table 4 above should be taken into account in the supply figure as they represent the net new available employment premises/land coming forward within the RLDP period. They also include the commitments on allocated sites that were identified in Table 3. For a calculation relating to net completions and estimated jobs numbers generated since 2018, please refer to Appendix 1.

We are now in a position where we can draw all the sources of employment land supply together, and then apply necessary qualitative adjustments to ensure that there is no double counting in the figures, so that only land that is realistically able to come forward is included in the supply figure:

**Table 5 – Conwy’s Employment Land Supply with Qualitative Adjustments**

Source of land supply	Amount (Ha)
<b>1. Undeveloped plots (Table 2)</b>	21.65ha
<b>2. Vacant unit f/space (Table 2)</b>	2.95ha
<b>3. Total supply</b>	<b>24.6ha</b>
<b>Adjustments to values in lines 1 and 2:</b>	
<b>4. Minus Tir Llwyd NYS<sup>i</sup></b>	14.92ha
<b>5. Minus Former Goods Yard – Builder Street NYS<sup>ii</sup></b>	1.2ha
<b>6. Minus Esgyryn NYS, Llandudno Junction<sup>iii</sup></b>	2.25ha
<b>7. Minus Land at Orme View, Dwgyfylchi<sup>iv</sup></b>	0.5ha
<b>8. Minus Penmaen Road (counted in commitments)<sup>v</sup></b>	0.26ha
<b>9. Total adjustments to subtract from supply</b>	<b>19.13ha</b>
<b>10. Total supply following adjustments</b>	<b>5.47ha</b>

<b>11. Add completions/commitments/losses not included above (Table 4)</b>	3.79ha
<b>12. Total usable land supply as at April 2024</b>	<b>9.26ha</b>
<b>13. Total land to allocate in Deposit RLDP (ELR figure of 16.4ha minus total supply of 9.26 ha)</b>	<b>7.14ha</b>

## 5. Rationale for the Coastal Development Strategy Area (CDSA)/Rural Split and how this translates to supply and allocations in the RLDP

- 5.1 The employment growth figures have been aligned spatially with the housing growth on a 90% CDSA : 10% rural area split. The RLDP evidence base documents for the economy i.e. Conwy Commercial Market Analysis and the Conwy Employment Land Review, suggest that employment activity and demand for sites is focused in the CDSA, primarily along the A55 corridor, and this is where our allocations should be located. The monitoring of the existing adopted LDP has shown this to be correct, with none of the rural employment allocations coming forward for development within the lifespan of the current LDP, with sites in areas along and accessible to the A55 such as Mochdre, Llandudno Junction, Llandudno, Conwy, Colwyn Bay and Kinmel Bay being more preferable.
- 5.2 Given the evidential and documented reasons for locating future employment allocations in the CDSA, the RLDP has focused land allocations in two locations off the A55 corridor – Llanddulas Quarry and Land at Bryniau, Llandudno. However, that does not mean there will be no employment growth, or employment will not be encouraged in the rural area. On the contrary, a number of flexible criteria based policies have been compiled which will support and allow appropriate new and expanding business developments in rural locations, recognising the importance of providing sustainable employment options in the rural area.

## 6. Understanding Supply and Growth levels CDSA vs Rural Area

6.1 The growth levels and supply for both the CDSA and rural areas have been combined in the supply tables in the RLDP because allocations are being focused towards the CDSA area. However it is possible to break these down to understand what the 90% and 10% relates to in terms of land.

6.2 Starting with the target figure of 16.4 hectares (note that the range in the ELR is between 14 and 20 hectares) apportioning the percentage split, the CDSA will take 14.76ha of growth and Rural 1.64ha. We then need to address the issue of supply, bearing in mind that Llanrwst is not currently classed as rural in the adopted LDP, but will be in the RLDP. Therefore completions and vacancies on Parc Ty Gwyn, Llanrwst have been included. The table below shows the breakdown against the total figures:

Table 6 – CDSA/Rural Split against RLDP growth

	CDSA (Target 90%)	Rural (Target 10%)	Total (100%)
<b>Target growth level of 16.4ha</b>	14.76ha	1.64ha	16.4ha
<b>Existing supply</b>	8.55ha	0.71ha	9.26ha
<b>Amount of land needed for growth in the RLDP</b>	6.21ha	0.93ha	7.14ha

6.3 Allocations in the CDSA total 12.65 hectares, however not all of this land will come forward in the timeframe of the plan. Looking at the phasing, it is envisaged that c.5-6 hectares of land at Llanddulas Quarry will be developed,

with c.3-4ha remaining. Likewise, not all the land at Bryniau may be developed out in its entirety during the plan period. Taking these considerations into account, this will bring the total estimated completions from allocated sites upto 2033 to around 7-8ha in the CDSA.

6.4 Growth in the rural area will be monitored via the AMR process to check on the effectiveness of the criteria based policies in the RLDP.

## 7. Candidate Sites for Employment Uses

7.1 Having calculated the supply and understanding the amount of land to be provided by allocations, sites have been appraised and put forward for allocation in the RLDP (See Background Paper 6 for more detail on the site assessment process.) The table below details the proposed allocated sites and phasing:

**Table 7 – Employment Allocations Detail and Phasing**

Site number	Site name and location	Use class	Phasing	Size in hectares
<b>115 (1)</b>	Llanddulas Quarry Area 1	B1/B2/B8	2027-2029	0.8*
<b>115 (2)</b>	Llanddulas Quarry Area 2	B1/B2/B8	2028-2032	4*
<b>115 (3)</b>	Llanddulas Quarry Area 3	B1/B2/B8	2032 onwards	4*
<b>103</b>	Land at Bryniau between Wormhout Way and Conwy Road, Llandudno	B1	2028-2033 onwards	3.85
<b>Total</b>				12.65

\*Note that the size is the developable area taking into account the development platforms / land re-profiling.

## 8. Conclusion

- 8.1 To conclude, the Conwy RLDP needs to strike a balance between ensuring enough employment land is available to promote and encourage growth in the county, whilst not over-supplying and sterilising land that could come forward for other uses. In calculating the supply, the 2024 figures produce a supply figure of **9.26ha**. This includes vacant plots on existing employment sites and committed and developed sites since the beginning of the plan period in 2018. Setting this against the Employment Land Review land target of **16.4ha** (from an acceptable ELR range of between 14 and 20ha) approximately **7.14ha** of land for employment is needed for allocation in the RLDP.
- 8.2 The necessary work around site searches is now complete, with a number of suitable, unconstrained sites being proposed for allocation in the RLDP. The land area for these sites total 12.65ha, however not all the land will come forward within the timeframe of the RLDP. While the proposed allocated sites are listed for reference within this background paper, greater detail regarding the site selection process can be found within Background Paper 6 – Site Deliverability.

## Appendix 1 - Replacement Local Development Plan 2018-2033 Net Completions Translated to estimated jobs numbers

Net completions (**including** vacant units) 2018 to 2024 = 4.24ha.

$42,400\text{sqm} / 35\% = 14,840 / 19 \text{ jobs per sqm} = 781 \text{ office jobs}$

$42,400\text{sqm} / 65\% = 27,560 / 45 \text{ jobs per sqm} = 612 \text{ general industrial jobs}$

\*Total office and industrial jobs potential including vacant units = 1,393

Net completions (**excluding** vacant units) 2018 to 2024 = 2.46ha.

$24,600\text{sqm} / 35\% = 8,610 / 19 \text{ jobs per sqm} = 453 \text{ office jobs}$

$24,600\text{sqm} / 65\% = 15,990 / 45 \text{ jobs per sqm} = 355 \text{ general industrial jobs}$

\*Total office and industrial jobs excluding vacancies = 808

\*Note – Job to floorspace ratios have been used to provide estimated jobs numbers.

Not all these jobs will relate directly to B1, B2, B8 use class. Therefore the data in this appendix has not been used to inform the supply calculation for B class land, but rather as a point of interest to show the relationship between completions and estimated job increases.

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<sup>i</sup> Tir Llwyd is not counted as supply due to its location within a flood risk area. Individual developments as they are approved are counted towards supply. The Growth Deal film studio potential development is acknowledged, but will likely be sui-generis use overall rather than B class.

<sup>ii</sup> 1.2 ha of land has permission for affordable housing so this is removed from the supply. 0.4 has permission for employment uses and this has been counted as a commitment (line 11)

<sup>iii</sup> Some of the site has been developed for housing and employment. The employment element has been counted in commitments (line 11)

<sup>v</sup> Some of the Penmaen Road allocation is already built out at the time of compiling these figures. To avoid double counting the vacant units and existing planning commitments, the vacant unit figure has been removed.