Birmingham Local Plan
5 Year Housing Land Supply 2023-28

November 2023

(updated March 2024 to reflect December 2023 NPPF and 2022 Housing Delivery Test)

5 Year Housing Land Supply 2023-28

1. Summary

1.1 This report was first published in November 2023 but has been updated to reflect the new version of the National Planning Policy Framework (NPPF) and the outcome of the Housing Delivery Test 2022, both of which were issued in December 2023.

1.2 The City has **4.45 years** supply. This is derived from a 5-Year requirement of **35,450** dwellings and a supply of **31,534** dwellings.

2. Introduction

2.1 Paragraph 76 of the December 2023 National Planning Policy Framework (NPPF) states that local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing if they have an adopted plan that is less than five years old and which identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.

2.2 The Birmingham Development Plan (BDP) was adopted in January 2017 and so is more than five years old. Work is currently underway to prepare a new Birmingham Local Plan to replace the BDP.

2.3 As the City Council does not have an up to date plan that was adopted in the past five years, the following requirement of paragraph 77 of the NPPF applies:

"local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply".

2.4 Paragraph 226 makes provision for local authorities to demonstrate a four year housing land supply if they have an emerging local plan that has reached at least regulation 18 stage of the Town and Country Planning (Local Planning) (England) Regulations 2012 and which includes both a policies map and proposed allocations towards meeting housing need. It is not considered that the provisions of paragraph 226 apply to Birmingham at this stage, as although work is currently underway on a new Local Plan for the city there is not yet a policies map that has been published nor any proposed allocations towards meeting housing need. The requirement to demonstrate a 5 year housing land supply therefore continues to apply in the City.

2.5 This paper sets out how the City's 5 Year supply has been determined.

3. Establishing the 5 Year Housing Requirement 2023-28

3.1 The NPPF states that the starting point for calculating the 5 year supply position should be the housing requirement figure set out in an adopted strategic plan or against the local housing need where the strategic policies are more than five years old.

3.2 As stated above, the BDP is now more than five years old and so the Local Housing Need (LHN) figure must be applied when calculating the five year housing land supply.

3.3 In 2018 the Government adopted the Standard Local Housing Need Method (LHN) to calculate local housing need and revised it in December 2020. The current method applies a 35% uplift to the 20 largest cities and urban areas, including Birmingham, reflecting the Government's objectives to drive housing into existing urban areas and encourage brownfield development.

The 5 year Housing Requirement 2023-28

3.4 The latest Standard Method calculation, which reflects the updated house price to workplace earnings ratio figures that were published in March 2023, gives Birmingham a local housing requirement of 7,090 dwellings per annum from January 2022 for the purposes of calculating the 5 year land supply.

3.5 Paragraph 77 of the NPPF states that where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period). 'Significant under delivery' is measured by the Housing Delivery Test. The Housing Delivery Test (HDT) was introduced in 2018 and assesses a local planning authority's performance of housing delivery against its housing requirement over the previous 3 years. 'Significant under delivery' is defined as being a HDT result that showed delivery below 85% of the housing requirement.

3.6 An average of 2,701 net dwellings have been completed each year since 2011 and the cumulative BDP requirement since 2011 has been exceeded by 4,062 dwellings. The Council has also achieved a result of 148% against the 2022 HDT. In light of the local planning authority passing the HDT and exceeding delivery targets no additional buffer is applicable.

3.7 Taking the above into account, **the 5 year requirement for 2023-28 is 35,450 dwellings** (Table 1).

Table 1: The 5 Year Requirement 2023/24-2027/28

Year	5 Year Period 2023 -2028
2023/24	7,090
2024/25	7,090
2025/26	7,090
2026/27	7,090
2027/28	7,090
Total	**35,450**

4. The 5 Year Housing Land Supply

4.1 The housing capacity on deliverable sites has previously been assessed through the annual Housing and Economic Land Availability Assessment (HELAA) process, which identifies sites which are suitable for housing and employment development in the city. As stated above, the Council has commenced an update of the BDP, called the Birmingham Local Plan. To inform the plan review, and in the context of the Local Housing Need figure for Birmingham, a comprehensive urban capacity study was undertaken in 2021, the initial findings of which were published in the Birmingham Local Plan Issues and Options consultation. The Local Plan Preferred Options consultation document is currently being prepared and an updated HELAA report for 2023 will be published alongside it.

4.2 A deliverable site is one which is available now, is in a suitable location for development and has a realistic prospect of being developed within five years. The review of sites is based on the Council's annual site monitoring and has a base date of 1st April 2023. The 2023 review of sites identified a 5 Year land supply of **31,534** dwellings of which **29,734** are on identified sites and a further **1,800** dwellings are on unidentified sites.

5 Year Supply on Identified Sites

Table 2 shows the source of identified sites in the 5-year supply and a list of the sites in the 5-Year supply is at Appendix 2. 43% of the capacity deliverable within 5 years on identified sites has detailed or outline planning permission, has Permission in Principle or is permitted development and 54% is under construction.

Table 2: Source of 5 Year Supply on identified sites

Status	Dwellings
Under Construction	15,964
Detailed Permission (Not Started)	12,337
Outline Permission	0
Permitted Development	407
Permission in Principle	0
Allocation in Adopted Plan	890
Other Opportunity	136
Total – Identified Sites	**29,734**

5 Year Supply on Unidentified Sites

4.5 The NPPF (paragraph 72) permits a windfall allowance as part of anticipated supply, where there is compelling evidence that they will provide a reliable source of supply. The City has a long track record of delivering windfall sites - and even with the best efforts of the HELAA to identify sites, windfalls continue to come forward and be developed in large numbers, as is inevitable for such a large and extensively developed urban area. The windfall methodology was examined and accepted by the Inspector at the BDP hearings and was tested at a called-in appeal (Former North Worcestershire Golf Club - 2017/02724/PA), the decision letter for which states: "the Secretary of State sees no reason to adjust the (windfall) allowance". More recently, the windfall allowance has been reviewed and updated in the new HELAA methodology.

4.6 A windfall allowance of 1,800 dwellings has therefore been added the 5 year supply, in accordance with the Council's windfall methodology. The windfall methodology is shown in Appendix 1.

Table 3: Source of 5 Year Supply on unidentified sites

Status	Dwellings
Windfalls	1,800
Total Unidentified Supply	**1,800**

Appendix 1
Windfall Assumptions Paper

1. Purpose

1.1 To determine the extent to which windfalls contribute to meeting the City's housing requirement and to establish and justify the windfall allowances in the 5 year housing land supply calculation and the 2023 HELAA.

2. Background

2.1 The 2012 NPPF addressed the issue of including windfalls in the housing land supply in a more positive manner than the guidance which it replaced (PPS3). The revised NPPF (December 2023) also permits the inclusion of a windfall allowance at paragraph 72:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends".

2.2 The most recent National Planning Practice Guidance (NPPG), published in July 2019 provides additional guidance, stating "A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance".

2.3 Birmingham has a long and impressive track record in delivering windfall sites, with 67% of all completions during the period covered by the UDP (1991 to 2011) taking place on windfall sites. In a city with an urban area of over 22,000 hectares it is inevitable that there will be a continual supply of land and buildings reaching the end of their useful life in their current use which are suitable for residential use. These opportunities can be very difficult to foresee.

2.4 This paper examines the supply and development of windfall sites since 2001.

2.5 Data used in this assessment has been taken from the Birmingham Land Availability and Development Enquiry Service ('BLADES'), a system which monitors planning commitments and residential development. In order to undertake this analysis data relating to windfalls has been extracted from the database and analysed. All figures in this paper are net.

3. What is a windfall site?

3.1 The revised NPPF defines windfall sites as "Sites not specifically identified in the development plan".

3.2 For the purpose of this paper and the windfall allowance in the HELAA, windfalls are sites which have not previously been identified at the time that detailed planning permission is granted. That means, not only have they not been identified through the local plan process but also that they have not been included within the HELAA.

4. The supply of windfall sites

4.1 Since 2001 36,501 dwellings have received detailed planning permission on windfall sites, an average of 1,659 per annum. Of these 30,790 (84%) were for new build schemes and 5,711 (16%) involved the conversion of an existing building. 20,857 (57%) of windfalls were located in the city centre. 29,890 (82%) of the windfalls coming forward were apartments and 6,611 (18%) were houses.

4.2 Although 36,501 windfall dwellings have been granted detailed planning permission since 2001 there have been large variations year to year from a high of almost 4,000 in 2021/22 to a low of just under 200 in 2009/10. Generally, the six years from 2001/2 to 2006/7 saw high levels of windfalls coming forward (2,450 per annum). Thereafter, the number of windfalls declined sharply with just 739 receiving detailed planning permission in the period 2008/9 to 2010/11, an average of 246 per annum. Since the beginning of the BDP plan period (2011/12) the annual supply of windfalls has varied considerably, with generally low levels from 2011/12 through to 2016/17 but then very high levels from 2017/18 which is the period following the adoption of the BDP.

Table A1: The Supply of Windfalls

Year	Windfalls Granted Detailed Permission	New Build	Conversion	Inside City Centre	Outside City Centre	House	Apartment	Over 0.06 ha	Under 0.06 ha
2001/2	2798	2637	161	777	2021	397	2401	2570	228
2002/3	807	713	94	453	354	105	702	649	158
2003/4	2698	2612	86	1725	972	224	2474	2528	170
2004/5	2452	1981	471	1639	813	249	2203	2306	146
2005/6	3522	3464	58	2407	1115	366	3156	3355	167
2006/7	2422	2380	42	1674	748	221	2201	2338	84
2007/8	822	748	74	368	454	134	688	698	124
2008/9	339	307	32	54	285	110	229	221	118
2009/10	185	192	-7	59	126	109	76	56	129
2010/11	215	171	44	28	187	38	177	118	97
2011/12	456	294	162	44	412	164	292	304	152
2012/13	545	260	285	41	504	188	357	417	128
2013/14	401	269	132	23	378	154	247	272	129
2014/15	1024	300	724	499	525	260	764	840	184
2015/16	936	770	166	301	635	229	707	787	149
2016/17	586	302	284	130	456	179	407	407	179
2017/18	2789	1987	802	1868	921	194	2595	2550	239

Year	Windfalls Granted Detailed Permission	New Build	Conv ersion	Inside City Centre	Outside City Centre	House	Apart ment	Over 0.06 ha	Under 0.06 ha
2018/19	2152	1698	454	1397	755	223	1929	1900	252
2019/20	731	405	326	233	498	120	611	574	157
2020/21	2860	2218	642	1998	862	2716	144	2650	210
2021/22	3988	3577	411	2740	1248	155	3833	3793	195
2022/23	3773	3505	268	2399	1374	76	3697	3512	261
Total	**36501**	**30790**	**5711**	**20857**	**15643**	**6611**	**29890**	**32845**	**3656**

4.3 Of the 32,799 windfall dwellings granted detailed consent 3,656 were on sites below the HELAA survey threshold. Small windfall sites typically include flats above shops, the subdivision of existing housing, intensification – for instance where a single dwelling is replaced by two - and small self-build schemes. Occasionally high-density apartment schemes also fall under the threshold. Previous uses of small sites coming forward as windfalls included retail, offices, and industrial. A breakdown of windfall approvals by site size is at Appendix 1A of this paper.

5. The development of windfall sites

5.1 Since 2001 32,314 dwellings have been completed on sites which came forward as windfalls, an average of 1,469 completions per annum. Of these, 27,221 (84%) dwellings were new build schemes and 5,093 (16%) were conversions. 14,862 (46%) of dwellings completed on windfall sites were located in the city centre. 25,536 (79%) of the windfalls completed were apartments and 6,778 (21%) were houses.

5.2 2018/19 recorded the highest level of windfall completions since 2001. The lowest level was 442 in 2011/12, reflecting the economic conditions of that time. Windfall completions since the start of the BDP plan period (2011/12) have fluctuated with the last seven years yielding the largest numbers in this time. Windfall completions in recent years are similar to the high levels reached in the period 2001/2 to 2008/9.

5.3 Of the 32,314 windfall completions 2,709 were on sites below the HELAA survey threshold. A breakdown of windfall completions by site size is at Appendix 1B of this paper.

Table A2: Windfall sites completed

Year	Windfalls Completed	New Build	Conver sion	Inside City Centre	Outside City Centre	House	Apart ment	Over 0.06 ha	Under 0.06 ha
2001/2	1252	942	310	367	885	247	1005	1099	153
2002/3	1474	1207	267	715	759	266	1208	1301	173
2003/4	1826	1650	176	935	891	189	1637	1712	114
2004/5	1416	1252	164	595	821	233	1183	1278	138
2005/6	2382	2132	250	1453	929	293	2089	2277	105
2006/7	1839	1750	89	1115	724	289	1550	1698	141
2007/8	2106	1724	382	1311	795	325	1781	1914	192

Year	Windfalls Completed	New Build	Conversion	Inside City Centre	Outside City Centre	House	Apartment	Over 0.06 ha	Under 0.06 ha
2008/9	2311	2132	179	1397	914	209	2102	2191	120
2009/10	985	902	83	544	441	214	771	890	95
2010/11	919	863	56	305	614	242	677	860	59
2011/12	442	414	28	14	428	204	238	406	36
2012/13	1065	879	186	102	963	477	588	874	95
2013/14	479	417	62	107	372	129	350	428	51
2014/15	900	793	107	115	785	322	578	785	115
2015/16	844	480	364	241	603	326	518	678	166
2016/17	1395	1285	110	178	1217	787	608	1261	134
2017/18	1593	1187	406	470	1123	455	1138	1422	171
2018/19	2832	2468	364	1688	1144	397	2435	2708	124
2019/20	1932	1470	462	845	1087	535	1397	1772	160
2020/21	1612	1295	317	854	758	314	1298	1478	134
2021/22	1641	1134	507	1160	481	103	1538	1502	139
2022/23	1069	845	224	351	718	222	847	975	94
Total	**32314**	**27221**	**5093**	**14862**	**17452**	**6778**	**25536**	**29509**	**2709**

5.4 It is clear from the tables that windfalls have historically played a very important role in enabling housing growth in the city. Indeed, at first glance the windfall completions figures can appear disproportionately high when they are compared with annualised completions summaries (for instance in the Authority Monitoring Report). One reason for this is that windfalls very rarely come forward on sites which are already in residential use. There are, therefore, very few demolitions of existing housing on windfall sites which means that the gross and net capacities on windfall sites tend to be similar.

5.5 With identified sites this is not the case. Since 2001 many sites identified through the local planning process involved the demolition and replacement of existing housing. With a substantial housing stock there is a continual programme of renewal and regeneration of housing which is no longer suitable for purpose. In many cases this involves the demolition of high-rise tower blocks and their replacement with traditional low-rise housing.

5.6 Although windfall sites have traditionally come forward in large numbers it is important to ensure that there is no double counting. When detailed planning permission is granted the site is checked against the HELAA to ensure that it is not already identified as a development opportunity. Windfalls coming forward in one year will be included as identified supply in the following years HELAA (and the windfall allowance will be reduced by the applicable annual assumption). Some windfall sites come forward and are developed or partially developed in the same year. Where this occurs, the completed dwellings will never be included in a HELAA.

6. Commentary

6.1 Windfalls have made an important contribution to meeting the city's housing growth over the last 20 years. Windfall dwellings make a major contribution to net completions as they rarely involve the demolition of existing housing.

6.2 Figures for new supply coming forward and for completions on windfall sites are not directly comparable on a year-to-year basis as there is usually a time lag between permission and completion. They are better considered as flows. Since 2001 the number of windfalls receiving detailed planning permission and the number of completions on windfall sites have been broadly similar although there were some large variations between new supply coming forward and completions taking place in individual years.

6.3 There was a noticeable downturn in the number of windfall dwellings being granted detailed planning permission after 2005/6 although the numbers still remained reasonably high for the next year or two. This reduction reflected the country's worsening economic position and the difficulties this brought for the house building industry. This was, however, not unique to windfall sites as planning applications for housing development generally, with the exception of those for subsidised housing, saw a downturn after 2005/6.

6.4 The drop off in new windfall supply began to impact on completions a couple of years later in 2008/9. Despite this windfall sites continued to make a substantial and important contribution to the provision of new housing. There has been an increase in the supply but a reduction in completion of windfall dwellings over the last five monitoring years since the peak in 2018/19. However, rates are still considerably higher than the lowest recorded levels since 2001.

6.5 The market for apartments, particularly in the city centre, was particularly affected by the economic downturn. Prior to 2007 a significant proportion of windfalls coming forward and being built had been apartments, many of which were in the city centre. The market was reluctant to provide apartments in the difficult economic climate during and this has had a significant impact on new windfall supply coming forward, however the market for apartments and the 'city living' concept has now been re-established.

7. Windfall assumption

7.1 The evidence shows that windfalls make a significant contribution to the delivery of housing supply in Birmingham. The contribution that windfalls can reasonably be expected to make to housing delivery is set out in Table A4 below. It is assumed that following adoption of the new plan, the windfall rate will be lower in the first five years and increase as time goes on and the degree of certainty is likely to diminish. Given the historic rates of windfall sites delivered in the city over the past 20 years these assumptions are considered to be a conservative estimate to avoid over-estimating supply from this source. It is clear that Birmingham has consistently delivered windfall sites and that such sites have become available every year.

7.2 No windfall allowance is made for the first year as all supply identified at the HELAA base date is already accounted for.

7.3 Although not included in the windfall allowance, sites which come forward as permitted development (mainly but not exclusively) from offices to residential, although not requiring planning permission, are also effectively windfalls where these have not previously been identified. In 2022/23 notification was received for 107 dwellings to be created from such

conversions. While these have not been taken into account in establishing the windfall allowance, they add flexibility to the allowance and the HELAA. The government has recently introduced a further extension of permitted development rights which seek to allow changes from Use Class E (a new Use Class introduced in September 2020 which subsumed a large range of uses previously in A, D and B1 Use Class) to residential use. This adds further flexibility to the windfall allowance and it is likely that the allowance is likely to be exceeded.

Table A3: Windfall Assumptions

Time Period	Annual Contribution (Dwellings)
Small Sites (Under 0.06ha)	
Short Term - Within 5 Years	50
Medium Term – Years 6 to 10	75
Longer Term – Beyond 10 Years	100
Larger Sites (0.06ha and above)	
Short Term - Within 5 Years	400
Medium Term – Years 6 to 10	500
Longer Term – Beyond 10 Years	600

Windfall Assumptions Paper - Appendix 1A

The Supply of Windfall Sites

Table A4: The Supply of Larger Windfalls (Above the 0.06ha HELAA Threshold)

Year	Windfalls Granted Detailed Planning Permission	New Build	Conversion	Inside City Centre	Outside City Centre	House	Apartment
2001/2	2570	2573	-3	622	1948	375	2195
2002/3	649	619	30	413	236	42	607
2003/4	2528	2504	24	1654	873	157	2371
2004/5	2306	1904	402	1575	731	208	2098
2005/6	3355	3399	-44	2364	991	302	3053
2006/7	2338	2343	-5	1671	667	193	2145
2007/8	698	689	9	348	350	78	620
2008/9	221	265	-44	40	181	73	148
2009/10	56	129	-73	34	22	73	-17
2010/11	118	143	-25	-1	119	0	118
2011/12	304	227	77	18	286	128	176
2012/13	417	207	210	33	384	118	299
2013/14	272	208	64	5	267	112	160
2014/15	840	255	585	405	435	189	651
2015/16	787	722	65	267	520	199	588
2016/17	407	222	185	80	327	142	265
2017/18	2550	1854	696	1771	779	150	2400
2018/19	1900	1561	339	1289	611	169	1731
2019/20	574	349	225	211	363	66	508
2020/21	2650	2122	528	1976	674	120	2530
2021/22	3793	3493	300	2652	1141	127	3666
2022/23	3512	3385	127	2327	1185	59	3453
Total	**32845**	**29173**	**3672**	**19754**	**13090**	**3080**	**29765**

Table A5: The Supply of Small Windfalls (Below the 0.06ha HELAA Threshold)

Year	Windfalls Granted Detailed Planning Permission	New Build	Conversion	Inside City Centre	Outside City Centre	House	Apartment
2001/2	228	64	164	155	73	22	206
2002/3	158	94	64	40	118	63	95
2003/4	170	108	62	71	99	67	103
2004/5	146	77	69	64	82	41	105
2005/6	167	65	102	43	124	64	103
2006/7	84	37	47	3	81	28	56
2007/8	124	59	65	20	104	56	68
2008/9	118	42	76	14	104	37	81
2009/10	129	63	66	25	104	36	93
2010/11	97	28	69	29	68	38	59
2011/12	152	67	85	26	126	36	116
2012/13	128	53	75	8	120	70	58
2013/14	129	61	68	18	111	42	87
2014/15	184	45	139	94	90	71	113
2015/16	149	48	101	34	115	30	119
2016/17	179	80	99	50	129	37	142
2017/18	239	133	106	97	142	44	195
2018/19	252	137	115	108	144	54	198
2019/20	157	56	101	22	135	54	103
2020/21	210	96	114	22	188	24	186
2021/22	195	84	111	88	107	28	167
2022/23	261	120	141	72	189	17	244
Total	**3656**	**1617**	**2039**	**1103**	**2553**	**959**	**2697**

Windfall Assumptions Paper – Appendix 1B

The Development of Windfall Sites

Table A6: The Development of Larger Windfalls (Above the 0.06ha HELAA Threshold)

Year	Windfalls Completed	New Build	Conversion	Inside City Centre	Outside City Centre	House	Apartment
2001/2	1099	896	203	477	622	283	820
2002/3	1301	1149	152	643	658	234	1067
2003/4	1712	1589	123	936	776	156	1556
2004/5	1278	1189	89	556	724	191	1089
2005/6	2277	2069	208	1490	787	257	2020
2006/7	1698	1669	29	1088	610	274	1424
2007/8	1914	1633	281	1226	688	277	1637
2008/9	2191	2085	106	1340	851	175	2016
2009/10	890	873	17	541	349	182	708
2010/11	860	815	45	457	403	226	634
2011/12	406	392	14	0	406	210	196
2012/13	970	844	126	92	878	442	528
2013/14	428	393	35	95	333	118	310
2014/15	785	732	53	82	703	299	486
2015/16	678	431	247	169	509	264	414
2016/17	1261	1235	26	159	1102	750	511
2017/18	1422	1142	280	412	1010	413	1009
2018/19	2708	2412	296	1666	1042	351	2357
2019/20	1772	1402	370	821	951	491	1281
2020/21	1478	1254	224	845	633	282	1196
2021/22	1502	1079	423	1125	377	83	1419
2022/23	975	814	161	325	650	219	756
Total	**29605**	**26097**	**3508**	**14545**	**15062**	**6177**	**23434**

Table A7: The Development of Small Windfalls (Below the 0.06ha HELAA Survey Threshold)

Year	Windfalls Completed	New Build	Conversion	Inside City Centre	Outside City Centre	House	Apartment
2001/2	153	46	107	62	91	21	128
2002/3	173	58	115	109	64	32	141
2003/4	114	61	53	44	70	33	81
2004/5	138	63	75	24	112	42	94
2005/6	105	63	42	22	83	36	69
2006/7	141	81	60	42	99	15	126
2007/8	192	91	101	85	107	48	144
2008/9	120	47	73	33	87	34	86
2009/10	95	29	66	4	91	32	63
2010/11	59	48	11	1	58	16	43
2011/12	36	22	14	14	22	-6	42
2012/13	95	35	60	10	85	35	60
2013/14	51	24	27	12	39	11	40
2014/15	115	61	54	33	82	23	92
2015/16	166	49	117	72	94	62	104
2016/17	134	50	84	19	115	37	97
2017/18	171	45	126	58	113	42	129
2018/19	124	56	68	22	102	46	78
2019/20	160	92	68	24	136	44	116
2020/21	134	41	93	9	125	32	102
2021/22	139	55	84	35	104	20	119
2022/23	94	31	63	26	68	3	91
Total	**2709**	**1148**	**1561**	**760**	**1947**	**658**	**2045**

Appendix 2
Schedule of Sites