

**West Berkshire Local Plan Review 2022-2039****Proposed Submission Representation Form****Ref:***(For official use only)*

|   |  |
|---|--|
| <b>Please complete online or return this form to:</b> | <b>Online:</b> <a href="http://consult.westberks.gov.uk/kse">http://consult.westberks.gov.uk/kse</a>           |
|   | <b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>          |
|   | <b>By post:</b> Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD |
| <b>Return by:</b>                                     | <b>4:30pm on Friday 3 March 2023</b>   |

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

*Please note the following:*

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

|   | <b>Your details</b>  | <b>Agent's details (if applicable)</b> |
|---|--|--|
| Title:                                      | Mr   |  |
| First Name:*                                | James  |  |
| Last Name:*                                 | McCabe   |  |
| Job title<br><i>(where relevant):</i>       | Principal Planning Policy Officer  |  |
| Organisation<br><i>(where relevant):</i>    | Wokingham Borough Council  |  |
| Address*<br><i>Please include postcode:</i> | Wokingham Borough Council<br>P.O. Box 157<br>Shute End<br>Wokingham<br>Berkshire<br>RG40 1WR |  |
| Email address:*                             | <a href="mailto:policyandplans@wokingham.gov.uk">policyandplans@wokingham.gov.uk</a>         |  |
| Telephone number:                           |  |  |

*\*Mandatory field*

**Part B – Your Representation*****Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

|   |                           |
|---|---------------------------|
| Your name or organisation (and client if you are an agent): | Wokingham Borough Council |
|---|---------------------------|

**Please indicate which part of the Local Plan Review this representation relates to:**

|                    |                                      |
|--------------------|--------------------------------------|
| Section/paragraph: | Paragraphs 6.1 – 6.3, and 6.9 – 6.27 |
| Policy:            | SP12                                 |
| Appendix:          |                                      |
| Policies Map:      |                                      |
| Other:             |                                      |

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

No comments.

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

| NPPF criteria   | Yes | No |
|---|-----|----|
| <b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development | X   |    |
| <b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence   | X   |    |
| <b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground  | X   |    |
| <b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF  | X   |    |

Please give reasons for your answer:

Wokingham Borough Council (WBC) supports the plan approach to the provision of housing.

At the time of preparing the Plan, the Local Housing Need (LHN) for West Berkshire District was calculated by the standard method as 513 dwellings per annum (dpa) at 1 April 2022. This equates to a minimum housing need of 8,721 additional homes in the period 2022 – 2039.

Policy SP12 – 'Approach to Housing Delivery' states that:

*'Provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development...'*

The housing requirement is expressed as a range, the lower end being the LHN figure and the upper end comprising LHN plus approximately 5% uplift.

Existing housing commitments, allocations in the adopted plan, and anticipated windfall developments account for 7,337 dwellings. Further land to supply a further 1,809 dwellings is required to meet the higher 9,146 figure (538 dwellings per annum).

Housing/mixed use allocations are set out in Policies SP13 – 15. The Plan sets out new allocations to provide 1,720 homes within the plan period. It additionally identifies a requirement for Neighbourhood Plans to deliver 80 dwellings (55 in Hungerford and 25 in Lambourn), which are both being prepared. Together, this equates to a new supply of 1,800 homes.

Overall, the housing supply in the Plan is 9,137 dwellings (1,800 from new allocations plus 7,337 from existing commitments and windfall). This exceeds the minimum LHN of 8,721. It falls modestly short of the upper end (9,146) by 9 dwellings.

WBC acknowledges that the Plan approach to windfall development is cautious in excluding an allowance from medium and large sites despite past trend data. This cautious approach is considered reasonable. If a less cautious approach was taken to windfalls, the upper end of the housing requirement range would be capable of being met, and exceeded.

In any event, the plan includes supply which is capable of exceeding LHN in accordance with national policy. WBC therefore considers the Plan to be sound regarding meeting its housing need.

### 3. Complies with the Duty to Co-operate

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

**Do you consider the Local Plan Review complies with the Duty to Co-operate?**

Yes

No

*Please give reasons for your answer:*

The Plan sets out a strategy which is capable of exceeding housing needs in accordance with national policy and which is not considered to give rise to significant cross boundary implications for Wokingham Borough. WBC therefore considers that the Duty to Co-operate has been met in this regard.

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

N/A

### 5. Independent Examination

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?**

Yes

No

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:*

N/A

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

## 6. Notification of Progress of the Local Plan Review


**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

|   |   |
|---|---|
| The submission of the Local Plan Review for Independent Examination                   | X |
| The publication of the report of the Inspector appointed to carry out the examination | X |
| The adoption of the Local Plan Review   | X |

*Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.*

|                  |   |             |            |
|------------------|---|-------------|------------|
| <b>Signature</b> |  | <b>Date</b> | 22/03/2023 |
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| First Name:*                                | James  |                                 |
| Last Name:*                                 | McCabe   |                                 |
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**Part B – Your Representation*****Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

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| Your name or organisation (and client if you are an agent): | Wokingham Borough Council |
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**Please indicate which part of the Local Plan Review this representation relates to:**

|                    |                      |
|--------------------|----------------------|
| Section/paragraph: | Paragraphs 6.4 – 6.8 |
| Policy:            |                      |
| Appendix:          |                      |
| Policies Map:      |                      |
| Other:             |                      |

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

No comments

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

| NPPF criteria   | Yes | No |
|---|-----|----|
| <b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development | X   |    |
| <b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence   | X   |    |
| <b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground  | X   |    |
| <b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF  | X   |    |

Please give reasons for your answer:

West Berkshire District Council (WBDC) forms part of the Western Berkshire Housing Market Area, alongside Wokingham Borough Council (WBC), Reading Borough Council (RBC) and Bracknell Forest Council (BFC). This grouping forms the basis for joint working on strategic planning matters. The Memorandum of Understanding (MoU) (October 2017) sets out the agreed position across the authorities that the housing need arising from the Western Berkshire HMA should be met within the Housing Market Area.

The RBC Local Plan was adopted in November 2019, and plans for at least 689 homes per annum. Reading's local plan was submitted in March 2018 when housing need was based on the Berkshire Strategic Housing Market Assessment (SHMA) figure of 699 dwellings per annum between 2013 and 2036. This leaves 10 homes per annum, or a total of 230 homes over the plan period, as unmet need. This shortfall is expected late in Reading's plan period (to 2036).

The Plan recognises (at paragraph 6.6) this unmet need of 230 dwellings and notes the Statement of Common Ground between the Western Berkshire HMA authorities that this need should be met within the Western Berkshire HMA. The Plan's response to this unmet need is to note the requirement for RBC to review its plan by 2024, which will need to consider how to deal with housing needs generated by the standard method.

It is important to note that the future local plan for Reading will consider the starting point for housing through the standard method set out in national planning policy and practice guidance. Following revisions to the standard method in December 2020, Reading Borough is identified as one of the 20 largest urban areas in England, where the 'cities and urban centres uplift' applies a 35% increase to the local housing need calculation.

Notwithstanding, the position is that a shortfall of 230 dwellings exists from RBC against the adopted plan.

The WBDC Plan includes a supply of housing which exceeds LHN by 416 dwellings. Additionally, it is noted that that if a less cautious windfall allowance was assumed in the Plan, developments on large and medium sites would be capable of addressing the unmet need of 230 dwellings in part or full (based on past trends). WBC request the Plan is updated to confirm that it contains a buffer to contribute to Reading's unmet housing need, if required. This would be consistent with the approach taken in the Bracknell Forest Local Plan, where the Inspectors have recently published their post hearing letter<sup>1</sup>. The letter confirms the plan is legally compliant and capable of being made sound with modifications.

### 3. Complies with the Duty to Co-operate

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

**Do you consider the Local Plan Review complies with the Duty to Co-operate?**

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

Though not considered a soundness issue, WBC request WBDC update the Plan to confirm that it contains a buffer to contribute to Reading's unmet housing need if required, consistent with the approach taken in the Bracknell Forest Local Plan main modifications and the Inspectors' initial recommendations.

### 5. Independent Examination

<sup>1</sup> <https://consult.bracknell-forest.gov.uk/file/6134773>

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?**

Yes

No

X

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:*

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**6. Notification of Progress of the Local Plan Review**


**Do you wish to be notified of any of the following?**

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*Tick*

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|---|---------------------------|

**Please indicate which part of the Local Plan Review this representation relates to:**

|                    |                                 |
|--------------------|---------------------------------|
| Section/paragraph: | Paragraphs 7.1 – 7.41           |
| Policy:            | SP20, SP21, SP22, DM32 and DM34 |
| Appendix:          |                                 |
| Policies Map:      |                                 |
| Other:             |                                 |

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

No comments.

## 2. Soundness

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### Do you consider the Local Plan Review is sound?

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| <b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF  | X   |    |

Please give reasons for your answer:

Wokingham Borough Council (WBC) notes that West Berkshire District Council's (WBDC) employment evidence identifies a need for 50,816sqm of office floorspace and a combined 91,109sqm industrial, storage and distribution floorspace over the plan period. Policy SP20 details the strategic approach to addressing economic development needs, Policy SP21 sets out a number of site allocations for industrial land, and Policy DM32 identifies Designated Employment Areas where businesses uses are to be safeguarded. No allocations are made in the Plan for additional office floorspace.

The Plan supports the redevelopment and regeneration of existing employment sites. It therefore retains, and identifies new, employment sites which can be intensified to meet some of its identified needs. New allocations for industrial use are anticipated to provide 58,400sqm. However, this is insufficient to meet the full identified needs for industrial land, resulting in a shortfall of 32,709sqm industrial floorspace. There are no estimates provided of how much floorspace the wider policy approach might deliver, and no specific land is identified to provide for office use. As a result, the full identified office need of 50,816sqm remains unmet. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs.

Like WBDC, WBC has commissioned a new Employment Land Needs Review, to better understand future economic needs, for both office and industrial/warehousing. The key emerging finding of the report is an increased need for industrial/warehousing floorspace across Wokingham Borough, which reflects changes in both the local and sub-regional economy. The report suggests there is no need for additional office floorspace.

Work is ongoing to assess the availability, suitability and deliverability of land promoted for economic uses within Wokingham Borough, as part of the Housing and Economic Land



Availability Assessment (HELAA), which will help to inform whether these economic needs can be met. However, given the scale of the need for new industrial/warehousing floorspace arising in Wokingham Borough and the small number of sites promoted for economic uses, at this stage WBC confirms that it is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated. Indeed, WBC cannot guarantee meeting the need arising from Wokingham Borough.

WBC recognise and support WBDC's ongoing recognition of the arising employment needs and the attempts to reach agreement with other authorities. WBC requests continued engagement with WBDC on this matter as part of the duty to cooperate.

Regarding retail, the Plan identifies a hierarchy of centres and designates primary shopping areas. It supports development for town centre uses that contributes to vitality and viability of these centres and provides for changes of use away from retail, only in certain circumstances. The Plan also designates a number of Retail Parks to safeguard retail and leisure uses. It does not identify any specific allocations for retail floorspace.

The Plan sets out a commitment to review retail evidence within the first 5 years of the Plan, owing to significant changes brought about by Brexit and COVID19 making it impractical to update its evidence in a meaningful way. WBDC's existing evidence from 2016 (The Western Berkshire Retail and Commercial Leisure Assessment jointly prepared with WBC, RBC, and BFBC) identified a need for 25,600sqm comparison retail floorspace in West Berkshire to 2036. This represents a significant need, and it is not clear how far this has been met, or whether the identified needs remain appropriate. WBC has embarked upon an update to retail and commercial leisure evidence as part of its own emerging Local Plan Update. Given the significant need previously identified, WBC stresses the importance of WBDC's evidence being updated as soon as possible and the Plan being reviewed as necessary to address this in the short term.

### 3. Complies with the Duty to Co-operate

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

**Do you consider the Local Plan Review complies with the Duty to Co-operate?**

Yes

No

*Please give reasons for your answer:*

WBC notes that separate duty to co-operate discussions are ongoing between the two authorities. WBC welcomes these discussions progressing.

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

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| ██████████ | ██████████ | Date | 22/02/2023 |
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| Organisation<br><i>(where relevant):</i>    | Wokingham Borough Council  |  |
| Address*<br><i>Please include postcode:</i> | Wokingham Borough Council<br>P.O. Box 157<br>Shute End<br>Wokingham<br>Berkshire<br>RG40 1WR |  |
| Email address:*                             | <a href="mailto:policyandplans@wokingham.gov.uk">policyandplans@wokingham.gov.uk</a>         |  |
| Telephone number:                           |  |  |

*\*Mandatory field*

**Part B – Your Representation*****Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

|   |                           |
|---|---------------------------|
| Your name or organisation (and client if you are an agent): | Wokingham Borough Council |
|---|---------------------------|

**Please indicate which part of the Local Plan Review this representation relates to:**

|                    |                          |
|--------------------|--------------------------|
| Section/paragraph: | Paragraphs 11.27 – 11.35 |
| Policy:            | RSA24, DM20              |
| Appendix:          |                          |
| Policies Map:      |                          |
| Other:             |                          |

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

No comments

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

| NPPF criteria   | Yes | No |
|---|-----|----|
| <b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development | X   |    |
| <b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence   | X   |    |
| <b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground  | X   |    |
| <b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF  | X   |    |

Please give reasons for your answer:

Wokingham Borough Council (WBC) broadly supports West Berkshire District Council's (WBDC) approach to the provision of Gypsy and Traveller sites.

WBDC published a 'Gypsy and Traveller and Travelling Showperson Accommodation Assessment' (GTAA) in 2019. A further GTAA Update was published in 2021 (GTAA 2021). The GTAA 2021 study identifies a cultural need for 30 pitches in the period 2021/22 – 2037/38. 20 of these pitches are for households that meet the definition of Gypsies and Travellers within the Planning Policy for Traveller Sites (PPTS). Further needs for a 4 pitch transit site (capable of accommodating 8 caravans) and 24 Travelling Showperson plots are identified.

The Plan proposes to address this need through a combination of site allocations and a criteria based policy (Policy DM20). WBC notes that the Plan does not set a specific requirement for pitches, rather it simply notes the GTAA evidence. The criteria based policy supports the development of Gypsy and Traveller pitches and Travelling Showpeople plots where relevant criteria are satisfied. There is no requirement for strategic housing allocations to provide pitches or plots as part of a mix.

Policy RSA24 proposes to allocate an additional 8 permanent pitches at an existing private site at Paices Hill within an area of land currently comprising transit pitches. This allocation is carried forward from the existing adopted plan. The site has now obtained planning permission for a change of use from 8 transit caravan pitches to 8 permanent Gypsy / Traveller pitches. It is noted that the site is located within the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston where new residential developments would not usually be acceptable. However, in this particular instance, it was considered that having permanent pitches on site would be an improvement to the existing transit provision as the former

would be expected to provide day rooms with more secure accommodation than touring caravans in the event of an emergency. WBC supports the allocation which will make a contribution towards identified need.

WBC notes that the Plan does not contain allocations to meet cultural needs in full, and while the criteria based policy will facilitate the delivery of windfall pitches where appropriate, there are no estimates provided on how many pitches this would enable. It is therefore not possible to say with certainty that needs over the plan period will be met in full. However, WBDC has committed via its updated Local Development Scheme (LDS) to produce a Gypsy and Traveller Accommodation Development Plan Document (DPD). The LDS sets out that this will contain policies and allocations to meet the Gypsy and Traveller Accommodation Needs. On this basis, WBC supports the production of the separate DPD to meet needs in full, and raises no issues of soundness in relation to the Plan.

As regards Travelling Showperson needs, Policy RSA25 proposes to allocate 24 Travelling Showperson plots. This would meet the identified need in full. WBC has no comments on this proposed allocation and supports the commitment to fully addressing Travelling Showperson need, which is considered sound.

### 3. Complies with the Duty to Co-operate

*Please see the guidance note for an explanation of what 'Duty to Cooperate' means.*

**Do you consider the Local Plan Review complies with the Duty to Co-operate?**

Yes

No

*Please give reasons for your answer:*

No comments

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

N/A

### 5. Independent Examination

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?**

Yes

No

X

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

### 6. Notification of Progress of the Local Plan Review


**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

|   |   |
|---|---|
| The submission of the Local Plan Review for Independent Examination                   | X |
| The publication of the report of the Inspector appointed to carry out the examination | X |
| The adoption of the Local Plan Review   | X |

*Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.*

|                  |   |             |                   |
|------------------|---|-------------|-------------------|
| <b>Signature</b> |  | <b>Date</b> | <b>22/02/2023</b> |
|------------------|---|-------------|-------------------|

**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**