



Delegated Report

Full Planning Application

Application No:	20220944
Location:	Land Adjacent To 33 Ivy Close, Gravesend, Kent, DA12 5NP
Description:	Erection of a new dwelling.
Applicant:	Mr Martyn Smith
Site Visit:	23 rd November 2022

Procedural Issues

The application proposes the creation of a new double crossover for the driveway, however the site location plan does not include this area within the redline. The redline location plan should include all land necessary to carry out the proposed development.



Moreover, the highway authority are landowners of the footway/highway and were not consulted under Certificate B on the application form. If permission were forthcoming, the agent would have been contacted to correct the redline plan and serve the correct notice on Kent County Council Highways as the landowner.

Submitted Documents/Plans

Application Form - dated 26/08/2022;
Planning Statement;
Drawing no. 1532-P001 - Site Location and Existing Block Plans;
Drawing no. 1532-P002A - Proposed Location Plans, Floor Plans and Elevations.

Relevant Planning History

This list shows the planning history post 2007. Applications prior to this are not considered relevant to this determination.

Reference	Description	Decision	Decision Date
20180641	Erection of a detached one bedroom bungalow in the side garden with associated parking space.	PERMITTED	08.04.2019
20120452	Erection of a detached one bedroom bungalow in the side garden with associated parking space.	PERMITTED	07.09.2012
20100491	Erection of a detached two storey, two bedroom dwelling in the side garden with detached double garage at the side.	REFUSED	08.07.2010
AP 2010/00016/ REF		APPEAL DISMISSED	18.11.2010
20090404	Erection of an attached two storey, two bedroom dwelling with a detached double garage to serve both existing and proposed dwellings.	REFUSED	10.07.2009
AP 09/00039/REF		APPEAL DISMISSED	27.01.2010
20080510	Erection of two storey side extension to form lounge, garage and hall at ground floor level with two bedrooms, study and bathroom/wc at first floor level.	PERMITTED	28.07.2008

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 - Sustainable Development
- CS02 - Scale and Distribution of Development
- CS05 - Gravesend Town Centre Opportunity Area
- CS10 - Physical and Social Infrastructure
- CS11 - Transport
- CS12 - Green Infrastructure
- CS14 - Housing Type and Size
- CS15 - Housing Density
- CS18 - Climate Change
- CS19 - Development and Design Principles

Gravesham Local Plan: First Review (1994)

- P3 - Vehicle Parking Standards
- T1 - Impact of Development on the Highway Network
- T5 - Access to the Identified Highway Network

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to

meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- Section 2 - Achieving sustainable development
- Section 4 - Decision-making
- Section 5 - Delivering a sufficient supply of homes
- Section 8 - Promoting healthy and safe communities
- Section 11 - Making effective use of land
- Section 12 - Achieving well-designed places
- Section 15 - Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 - amended June 2020
- Technical Housing Standards - Nationally Described Space Standard (2015)
- SPG 4 - KCC Parking Standards (2006)
- Householder Extensions/Alterations Design Guide (2021)

Consultations, Publicity and Representations

Consultees

GBC - Environmental Protection - After reviewing this application we have the following comments;

Smoke Control Area Informative - The proposed development is situated in a smoke control area. As such, only authorised smokeless fuels as listed in the Smoke Control Areas (Authorised Fuels) Regulations 1991 shall be burnt or fireplaces/appliances exempted by Smoke Control (Exempted Fireplaces) Orders shall be utilised. Exempt appliances are appliances (ovens including pizza and tandoori ovens, wood burners and stoves) which have been exempted by Statutory Instruments (Orders) under the Clean Air Act 1993. These have passed tests to confirm that they are capable of burning an unauthorised or inherently smoky solid fuel without emitting smoke. They must be fitted and used according to manufacturer's instructions and they can only be used for the fuel for which they are designed. When purchasing fuels and fireplaces the applicant should clarify with the vendor their suitability with respect to use in Smoke Control Areas. For further information, including confirmation that an appliance and/or fuel is suitable for use in a smoke control area, the applicant should contact the Council's Regulatory Services air.quality@gravesham.gov.uk

Contaminated Land - The applicant shall undertake a watching brief during construction in case any contamination issues are encountered. If during development any contamination is found, the local planning authority should be informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

Electric Vehicle Charging Point - This Service would wish to see the inclusion of suitable electric vehicle charging facility at the proposed dwelling in support of the Council's commitment to become carbon neutral by 2030.

Code of Practice on Construction and Demolition - Please apply due to the close proximity of residential properties and risk of noise and dust nuisance to them.

Drainage/sewerage - The foul sewage shall be removed by means of the mains drainage system and not by the use of non-mains sewerage systems, unless connection to the drainage system is not reasonably practicable. If foul sewage is to be removed using non-mains sewerage systems, a sewage treatment plant or septic tank system will be considered in preference to a cesspool. Such a system may require the prior consent of the Environment Agency under the terms of the Water Resources Act 1991. Applicants are therefore advised to discuss their requirements with the Environment Agency at the earliest opportunity. It

should be ensured that the septic tank or cesspool is of adequate capacity to serve the proposed development and suitable access and hardstanding area shall be maintained to it on site.

GBC - Highways Officer - This proposal gives rise to some concerns although it does not warrant a recommendation of refusal. The parking area is shown as 4.8 metres x 4.8 metres, which is less than the preferred size of 5m x 5m, however the smaller size is generally nationally recognised as an appropriate size of two parking spaces.

To comply with the requirements of SPG4, two secure cycle parking spaces should be provided.

The applicant should contact Kent County Council as Highway Authority regarding any alterations to the footway to accommodate carriage crossovers.

Local Ward Councillors - No comment received.

Neighbouring properties

Eight surrounding properties were consulted and no representations were received. The consultation period expired 26th October 2022.

Preliminary Matters

This site has been subject to numerous planning applications for the erection of new dwellinghouses in the side garden area. These applications have proposed dwellings of different sizes and scale, from two storeys to bungalows.

The applications proposing two storey dwellinghouses have been refused (refs. 20100491 / 20090404) and two were dismissed at appeal by the Planning Inspectorate (AP2010/00016/REF / AP09/00039/REF). However, the bungalow applications (refs. 20180641 / 20120452) were supported by the Local Planning Authority.

The planning history of the property is a material planning consideration for this application.

Officer's Analysis

Site Description

The application site lies on the western side of Ivy Close to the south of the turning head, just before the road bends to the east. Ivy Close is a planned estate built in the 1970's located within the urban area and comprises mainly pairs of semi-detached two storey dwellings and short terraces. The exception is at the entrance to the Close where there is a bungalow either side of the road.

The site is a triangular corner plot which slopes down from west to east. The site was originally the side garden to no 33 Ivy Close, the host dwelling, and occupied with a single garage and driveway serving the host dwelling and was enclosed with planting. The garage, driveway and garden have been removed.



Google Street View (May 2018)

Following planning permission ref. 20180641 the area has been enclosed by high-level boarding. The Local Planning Authority granted permission (08/04/2019) for a one bedroom bungalow on the site, with associated parking.



Google Street View (November 2022)

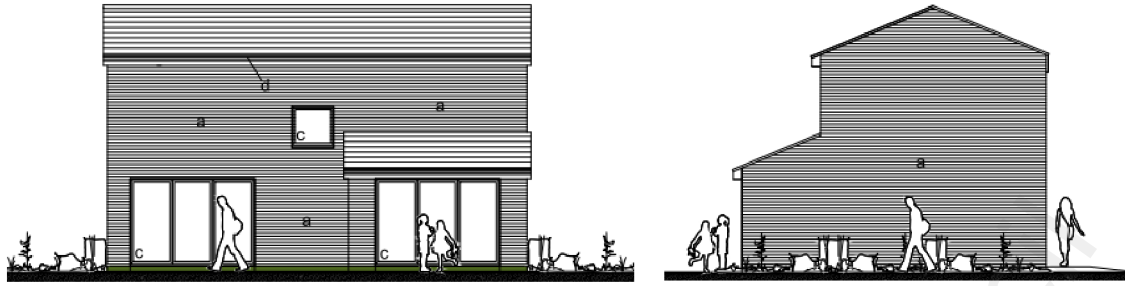
Development Proposal

This application proposes the erection of a detached two bedroom property in the side garden of no.33 Ivy Close. The proposed dwelling will be constructed in line with the existing building line of no. 33 Ivy Close.



As demonstrated by the proposed block plan above, due to the constraints of the site, the proposed dwelling will be significantly shallower and wider than the surrounding properties on the Close. Moreover, the height of the proposed dwelling is considerably lower than the other properties on the Close, as highlighted in the screenshots below:





The new dwelling will have a similar pattern and layout of fenestration, on the front elevation, to other properties on Ivy Close, with bay and high-level windows at first floor. There are no flank windows proposed. On the rear there will be two bifold doors and a central window serving the stairwell, however no first floor rear facing windows are proposed on the new dwelling. The property will have the following dimensions:

- Depth - 5.45m
- Depth (inc. rear projection) - 7.35m
- Width - 10.1m
- Height (max) - 6.4m
- Height (eave) - 5.25m

The proposed dwelling will contain an open plan kitchen/diner, a living room and w.c. at ground floor, with two double bedrooms and a family bathroom at first floor. It will have two off-street parking spaces located to the front.

Housing Need

Given Gravesham's current inability to demonstrate a 5 year housing land supply (a 3.27 year supply has most recently been calculated within the statement published by Gravesham Council), and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014) Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2021). This requires that in regard to housing development, planning permission should be granted unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in NPPF paragraph 182)
- Sites of Special Scientific Interest;
- Green Belt,
- Local Green Space,
- Areas of Outstanding Natural Beauty
- Irreplaceable habitats;
- Designated heritage assets (& other heritage assets of archaeological interest, see NPPF footnote 68); and
- Areas at risk of flooding or coastal change.

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and

guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 125(c)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.

The proposed development for a net increase of '1' residential units would offer a minimal but important contribution towards meeting this local need and, accordingly, officers considers that this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the NPPF (2021) which requires new development to contribute positively to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Density of Development

Development on this site should meet the requirements of Policy CS14 (LPCS), where the Council expects new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area. Policy CS15 (LPCS) requires that all new housing will be developed at a density, which is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. These policies will be considered and assessed against the proposal later in this report.

Principle of Development

The site is defined on the Policies Map of the Gravesham Local Plan Core Strategy (the Core Strategy) as lying within the urban boundary of Gravesend, Northfleet and Ebbsfleet. Therefore, the site is within the urban area of Gravesend and Policy CS02 (LPCS) prioritises development in the urban area as a sustainable location for development. As such, there is no objection to the broad principle of residential development within this location subject to it meeting the detailed requirements of government and development plan policy, which will be assessed in later sections of this report.

The principle considerations in the assessment of this application are:

- Design, Character and Appearance
- Amenity of Future Occupiers
- Neighbouring Amenity
- Parking and Highways
- Any Other Material Planning Considerations

Design, Character and Appearance

Policy CS19 (Development and Design Principles) (LPCS) states that new development will be visually attractive, fit for purpose and locally distinctive. It also seeks to conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area, whilst ensuring that the design, layout and form of new development will be derived from a robust analysis of local context and character and make a positive contribution to the street scene, the quality of the public realm and the character of the area.

Ivy Close has a spacious character, which is derived from the open plan nature of the estate and the generous front gardens serving many of the dwellings. There are also several properties scattered around the estate, including the application property, which have large side gardens. It is noted that some of these have been extended to the side, but nevertheless these areas are considered a planned part of the original estate design and are important contributors to its open character. The proposed development would occupy the whole side garden of no.33 and infill significant proportion of the open space on the corner of the turning space within the Close, which is harmful to the character of the area contrary to Policy CS19 (LPCS) and Section 12 (NPPF).

Although planning permission has been granted by the Local Planning Authority for a one bedroom bungalow on the site, the single storey structure would retain the open feel of the estate by virtue of its height and have a lesser impact on the character. Furthermore, there were previous refusals dismissed at appeal for two storey dwellings on this plot. In the latest appeal (ref. APP/K2230/A/10/2133371), the inspector concluded that the proposal would “compromise [the open character and side garden of no.33] to the extent that it would be unacceptably harmful to the character and appearance of the area”. Whilst the application and appeal were considered under a historic policy context, the characteristics of the development remain the same and Policy CS19 (LPCS) seeks for developments to “integrate well with the surrounding local area” and “make a positive contribution to the street scene... and the character of the area”, which is not achieved by developing the side garden that is a key characteristic of the estate.

As aforementioned in this report, the proposed dwelling will have some similar design features and materials to the surrounding properties within the street scene. Moreover, the width of the property would serve to replicate, to some degree, the semi-detached properties within the Close. However, the squat height and narrow depth of the proposed dwelling are at odds with the surrounding context. These compromises in scale have been adopted due to the spatial constraints of the site and result in a contrived, unbalanced appearance. The eave height of the new dwelling will match the surrounding properties, but the overall height is significantly lower which further (see street view images below):



This contrived design and squat appearance is not only out of character and harmful to the street scene, but demonstrates that a two storey, two bedroom property is overdevelopment of the site. In order to squeeze the property onto the site, a significant drop in the height and reduction in the depth of the building is required to meet the constraints of the site and is overdevelopment, as well as out of character with the surrounding context and incongruous design.

The poor design to adapt to the constraints of the site is exacerbated by the blank first floor façade at the rear. Due to the land levels and properties at the rear, the first floor rear windows have been removed to mitigate overlooking. However, this lack of fenestration adds to the incongruous appearance of the new dwelling.

Overall, the proposed dwelling is contrived, out of character, cramped onto the site and has an incongruous appearance, all of which have a harmful impact on the street scene. The scale of the development compromises the planned area of open space which are characteristics of the estate and serve to further harm the character and appearance of the street scene. As such, the proposed dwelling is poor design and fails to make a positive contribution to the character of the area, instead causing harm to it, contrary to Policy CS19 (LPCS) and Section 12 (NPPF).

Amenity of Future Occupiers

Policy CS19 (LPCS) requires that all development should be ‘fit for purpose’ and be ‘adaptable to allow changes to meet the need of users’ and that ‘the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines’ (RLG) (2020). Moreover, on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England and set out how these would be applied through planning policy. These standards came into effect on 1 October 2015.

Proposed Dwelling

The proposed dwelling has a gross internal floor area of 91.2m². The Nationally Described Space Standards (2015) states that a two-bedroom two storey dwelling, with bed spaces for 4 people, should have a minimum floor area of 79m², with built-in storage space of 2m². Therefore, the proposed dwelling is in accordance with the NDSS. However, Gravesham's RLG breaks down the Council's individual requirements for certain rooms, these have been formulated into a table to compare with the floor area of rooms within the proposed dwelling.

	RLG (minimum floor area)	Proposed Room Size
Living	13.2m ²	15.8m ²
Kitchen/Diner	12m ²	23.7m ²
W.C.	1.3m ²	1.6m ²
Double Bedroom	11.2m ²	12m ²
		15.7m ²
Bathroom	3.6m ²	4.9m ²

Table 2 has been colour coded (green complies, red fails) to show which rooms within the dwelling meet the guidance within the RLG. The table demonstrates that all rooms are in accordance with the recommendations and will provide acceptable living conditions for future occupiers. The bedrooms are single aspect, with north facing windows, which could be considered to provide a gloomy living environment for future occupiers, however it is not sufficient grounds to refuse the application.

The garden area for the proposed dwelling wraps around the property and will have an overall area of approx. 105m², which includes the narrow space at the side of the building. It will have a maximum depth of 7.7m. The RLG states that the garden area for a two bedroom dwelling should have a minimum area of 37.2m² and a minimum depth of 7.6m. Therefore, the amenity space provided is in accordance with the RLG.

Existing Dwelling (no. 33 Ivy Close)

The application property is a three bedroom semi-detached dwelling. The proposed development will significantly reduce the original garden area of the dwelling, which will retain a maximum depth of 9m and an area of 46m². Gravesham's RLG states that the minimum garden area for a three bedroom property should be 60m² and a minimum depth of 10m. Therefore, the proposed development will harm the amenity of existing and future occupiers of no.33 Ivy Close to the detriment of their amenity by significantly and permanently reducing their private amenity space.

Conclusion on Future Occupier Amenity

The proposed development is considered to provide acceptable levels of amenity for future occupiers, but will result in material harm to the amenity of existing and future occupiers of no.33 Ivy Lane. The new dwelling will occupy the side garden of no.33, significantly and permanently reducing the properties private amenity space, below the minimum requirement set out in Gravesham's RLG. As such, the development fails to safeguard amenity contrary to Policy CS19 (LPCS) and Section 12 (NPPF).

Neighbouring Amenity

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and paragraph 127 of the NPPF (2021) requires development to have a high standard of amenity for existing users (in this case surrounding properties).

The proposed dwelling is not considered to have any detrimental impact on the amenity of adjoining

properties in terms of loss of light, loss of privacy, outlook or sense of enclosure. As discussed previously in this report, the design of the dwelling has responded to the constraints of the site with a view toward protecting amenity of neighbouring properties. The first floor rear windows have been removed to mitigate overlooking to the properties on Princes Rd, which are at a lower ground level. The shallow depth of the proposed dwelling means that it would not have any impact on natural light, outlook or create a sense of enclosure for surrounding properties.

No representations were received from surrounding properties consulted as part of this application.

Overall, the development is not considered to have any material impact on the amenity of surrounding properties and is therefore in accordance with Policy CS19 (LPCS) and Section 12 (NPPF).

Parking and Highways

The proposed development involves the creation of a new access onto Ivy Close and will provide two off street parking spaces, perpendicular to the highway. The parking area will have a width of 4.75m and a depth of 4.75m. As referenced previously in this report, the applicant has not served notice on the highway authority as the landowner which is required as the redline extends onto the highway.

Notwithstanding this matter, Gravesham's Highways Officer has expressed some concern with the application by virtue of undersized parking spaces. The parking space to the front of the property, for two vehicles is below the minimum recommendation within Gravesham's adopted parking standards (SPG4) (2006), which states that a parking space should have a width of 2.5m and a depth of 5m. Although substandard compared to the SPG4 dimensions, the Highways Officer has commented that other guidance has more leniency in dimensions. For instance, Kent County Council's newly published vehicle crossing guidance (2022) states that minimum dimensions for a driveway space is 2.4m x 4.8m. The proposed driveway is marginally below the KCC guidance (2022), however this is not considered to be significantly undersized to warrant refusal of the application.

In addition, Gravesham's SPG4 states that one secure cycle space should be provided per bedroom, however the plans do not detail any provision of cycle storage. The cycles could be securely stored in the garden of the property, which would not significantly reduce the available garden area for future occupiers, and therefore the lack of cycle storage is not considered sufficient grounds to refuse the application.

Overall, even though there are some concerns with the proposed development in terms of parking and highways, these are minor issues and not sufficient grounds to refuse the application. Specifically the cycle store could be secured by condition and the parking spaces are only marginally undersized.

Any Other Material Planning Considerations

Refuse - Policy CS19 (LPCS) requires new development to incorporate appropriate facilities for the storage and recycling of waste.

The plans submitted do not demarcate the proposed refuse area or store for the property. However, there is adequate space on the frontage to store bins required for a two bedroom dwelling. The bins would be moved out onto the edge of the curtilage on collection days, which is the same strategy used by other properties within the close. If permission were forthcoming a condition would be attached to the decision notice to ensure that details of the bin store and collection strategy are submitted to, and approved in writing by the Local Planning Authority.

Contaminated Land - Policy CS19 (LPCS) and Paragraph 174 of the NPPF (2021) require new development to avoid adverse environmental impacts of land contamination and remediating contaminated land. As the site has historic commercial uses and near historic landfill sites if the application were to be supported a condition would be attached to ensure that a contaminated land study is undertaken prior to any development commencing.

Subject to the recommended condition, no conflict with Policy CS19 (LPCS) or Paragraph 174 of the NPPF (2021) is considered to occur in terms of land contamination issues.

Ecology and Biodiversity (Bird Mitigation) - The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering water birds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites, which means that further declines in the bird population cannot be ruled out. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Having considered a number of options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £275.88 for every new dwelling provided within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds.

In this instance, the proposed development would result in the creation of an additional residential property and as such, additional recreational activity would result. Therefore, it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Policy CS12 (LPCS). In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site of £275.88 per new dwelling unit.

The applicant has not paid the SAMMS Mitigation Contribution Agreement tariff and therefore fails to comply with the requirements of the Habitat Regulations, as well as Section 15 (specifically paragraphs 180 and 181) of the NPPF and Policy CS12 (LPCS).

Conclusion

The application has been fully considered and is contrary to local and national planning policy.

The proposed dwelling is contrived, out of character, cramped onto the site and has an incongruous appearance, all of which have a harmful impact on the street scene and the scale of the development compromises the planned area of open space which is characteristics of the estate and serve to further harm the character and appearance of the street scene. As such, the proposed dwelling is poor design and fails to make a positive contribution to the character of the area, instead causing harm to it, contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2021).

In addition, the proposed dwelling will occupy the side garden of no.33 and significantly reduce the private amenity space, below the minimum requirement set out in Gravesham's RLG. As such, the development fails to safeguard amenity contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2021).

Lastly, the proposal fails to secure a contribution towards strategic mitigation measures within Special Protection Areas, and in the absence of this contribution or adequate information to inform an Appropriate Assessment, the development fails to comply with the requirements of the Habitat Regulations and Section 11 (specifically paragraphs 109 and 118) of the National Planning Policy Framework (2021) and Policy CS12 of Gravesham's Local Plan Core Strategy (2014).

Therefore, it is recommended that the application is refused.

Recommendation

Refusal

(For detailed reasons for refusal and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	29 th November 2022	Dated:	30 th November 2022