



Delegated Report

Full Planning Application

Planning Application No: 20250753

Location: 44 - 46 The Grove Gravesend Kent DA12 1DF

Description: Upward extension of existing building through the construction of 1 additional storey to provide 6no. flats along with necessary ancillary works.

Applicant: Substantia Capital Ltd

Site Visit Date: 15th August 2025

Submitted Documents/Plans

Planning Application Form;

Drawing No. 100.001 – Existing Block and Location Plan;

Drawing No. 100.002 P0 – Existing & Proposed Block Plans;

Drawing No. 100.002 P0 – Existing Site Plan;

Drawing No. 100.010 P0 – Existing Lower Ground Floor Plan;

Drawing No. 100.015 P0 – Existing Roof Plan;

Drawing No. 100.015 P0 – Existing Fourth Floor Plan;

Drawing No. 100.020 P0 – Existing Elevations;

Drawing No. 100.030 P0 – Existing Sections;

Drawing No. 200.001 P0 – Proposed Site Plan;

Drawing No. 200.010 P0 – Proposed Lower Ground Floor Plan;

Drawing No. 200.015 P0 – Proposed Fourth Floor Plan;

Drawing No. 200.016 P0 – Proposed Floor Plan;

Drawing No. 200.020 P0 – Proposed Elevations;

Drawing No. 200.030 P0 – Proposed Section;

Supporting Documents – Design and Access Statement;

Supporting Documents – Daylight and Sunlight Assessment (Neighbouring Properties) (July 2025);

Supporting Documents – Daylight and Sunlight (of Proposed Scheme) (July 2025);

Supporting Documents – Noise Impact Assessment;

Supporting Documents – Noise Technical Note;

Supporting Documents – Transport Note; and

Covering Letter.

Relevant Planning History

Reference	Description	Decision	Decision Date
20240942	Prior approval for the change of use of 44-46 The Grove from office use (Class E) to 37 residential units (Class C3) under Part 3, Schedule 2, Class MA of the General Permitted Development (England) Order 2015 (GPDO).	Permission Granted	09.12.2024
20210291	Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O of the Town and Country Planning (General Permitted Development) (England)	Permission Granted	29.04.2021

	Order 2015 (as amended) as to whether Prior Approval is required in respect of the proposed change of use of second and third floors from Class E (previously Class B1(a)) (offices) to 12 residential units (Class C3 (dwellinghouses)).		
20210256	Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class M of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) as to whether Prior Approval is required in respect of the proposed change of use of the first floor from Class E (previously Class A2) (financial and professional services) to 2 residential units (Class C3 (dwellinghouses))	Prior Approval Not Required	29.04.2021
20050546	Installation of air conditioning unit on main roof of building including guard rails.	Permitted	22.08.2005
19990738	Determination as to whether prior approval is required for the installation of 3 no. cross polar panel antennae, pole mounted off existing building, equipment cabin and ancillary development on the roof.	Telecomm - Prior Approval not required	12.11.1999
19890577	Circular 18/84 Consultation in respect of the construction of a ramp.	Permitted	07.09.1989
19871048	Circular 18 84 consultation in respect of the erection of a two storey rear extension to form parking access at basement level with office over at ground floor level	Application Refused	08.03.1988
19870536	Circular 18 84 consultation in respect of the erection of a single storey rear extension to form office	Application Refused	08.03.1988
19623494	Revised application for car park	Permitted	08.01.1970
19632393	Garage forecourt & storage tanks	Permitted	12.08.1963
19622494	Petrol filling station with retail sales and parking facilities with multi-storey offices over. Foul water to main sewer in The Grove.	Permitted	27.01.1966
19621494	Five floors office accommodation with associated car park over petrol filling station and car showrooms. Foul water drainage to main sewer	Permitted	28.10.1965
19620494	Six storey block comprising garage and petrol filling station with retail sales on ground floor and office accommodation.	Permitted	25.10.1962
19490352	Change of Use - private garage to general motor repair workshop	Application Refused	06.02.1949

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS05 – Gravesend Town Centre Opportunity Area
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 - Housing Type and Size
- CS15 - Housing Density
- CS18 – Climate Change
- CS19 – Design and Development Principle
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC3 – Development Affecting Conservation Areas
- T1 – Impact of Development on the Highway Network
- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) 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 (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 5 – Delivering a sufficient supply of homes
- Section 6 – Building a strong, competitive economy
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic 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)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

Consultees

External

KCC – Highways and Transportation

This application is located in a sustainable location with easy walking / cycling access to Gravesend Railway Station, to numerous bus services and the town centre facilities.

It is proposed that the six additional flats will be marketed as car-free which, given the parking restrictions in the nearby roads limiting parking to 2 hours only, should be realistic. Cycle parking is provided by adding 6 spaces to the existing cycle parking for the building.

Therefore no objection on highway grounds is raised to this application provided a Condition is applied to ensure the 6 additional cycle parking spaces are available prior to first occupation of the new units and that none of the existing car parking spaces are allocated to the new flat units.

Internal

GBC – Environmental Protection

The following comments are made:

Noise

The noise Technical Note dated 11 July by KP Acoustics (Ref: 26800.250708.L1) has been reviewed. This builds on the Noise Impact Assessment submitted with a previous Permitted Development application. Providing the windows are fitted with an appropriate level of glazing (specifications given in Table 2.1 of the Technical Note), internal noise levels in the proposed new flats will be compliant with the criteria given in BS8233:2014. There is therefore no objection to the application on noise grounds> it is recommended that a condition is attached to any permission requires the windows to be installed as per the specification.

Code of Practice on Construction and Demolition

Please apply as appropriate to minimise any impact of the build on the surrounding residential premises.

Neighbouring properties

The application was publicised by the displaying of a site notice and individual letters sent to 39 surrounding properties with an overall expiry date of 28th August 2025. Four objections have been received making the following summarised comments:

- Noise
- Loss of Light
- Overshadowing
- Privacy from balconies
- Design
- Out of character
- Over-intensification
- Scale
- Impact on character and appearance of the area
- Overdevelopment
- Sustainable development and construction practices
- Parking
- Disturbance from construction and increased noise pollution
- Impact on the adjacent nursery

Officer's Analysis

Background

44-46 The Grove was previously in use as offices, however a recent prior approval application (App. Ref. 20240942) for the *change of use of 44-46 The Grove from office use (Class E) to 37 residential units (Class C3) under Part 3, Schedule 2, Class MA of the General Permitted Development (England) Order 2015 (GPDO)*, was given permission in December 2024. Therefore, the building's lawful use is now residential.

Proposal

This application seeks permission for the erection of upward extension of existing building through the construction of 1 additional storey to provide 6no. flats along with necessary ancillary works.

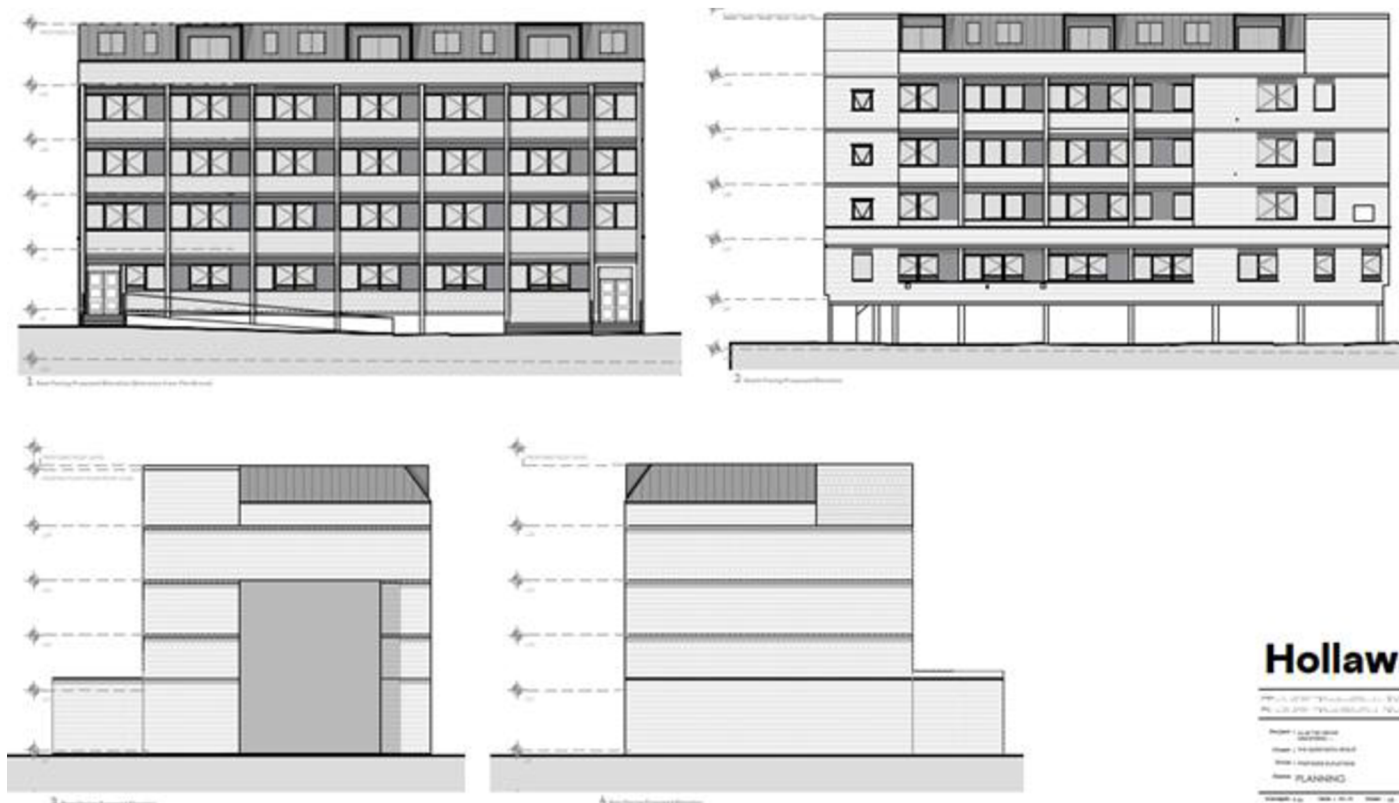
The proposed extension would create a 5th floor on the existing roof, which already has built form for access and plant room. The existing roof plant room has a height of 3.47m which dominates a large portion of the west and south elevations. Around the whole roof is a 1.48m high parapet wall and a 3.43m high structure

which appears to be a store room. The proposed extension would have a height of 3.45m, therefore there would not be increase in height above the existing plant room. As such, the proposed extension would have the appearance of an infill extension rather than a whole new floor. The following drawing excerpts show the existing and proposed elevations.

Existing Elevations

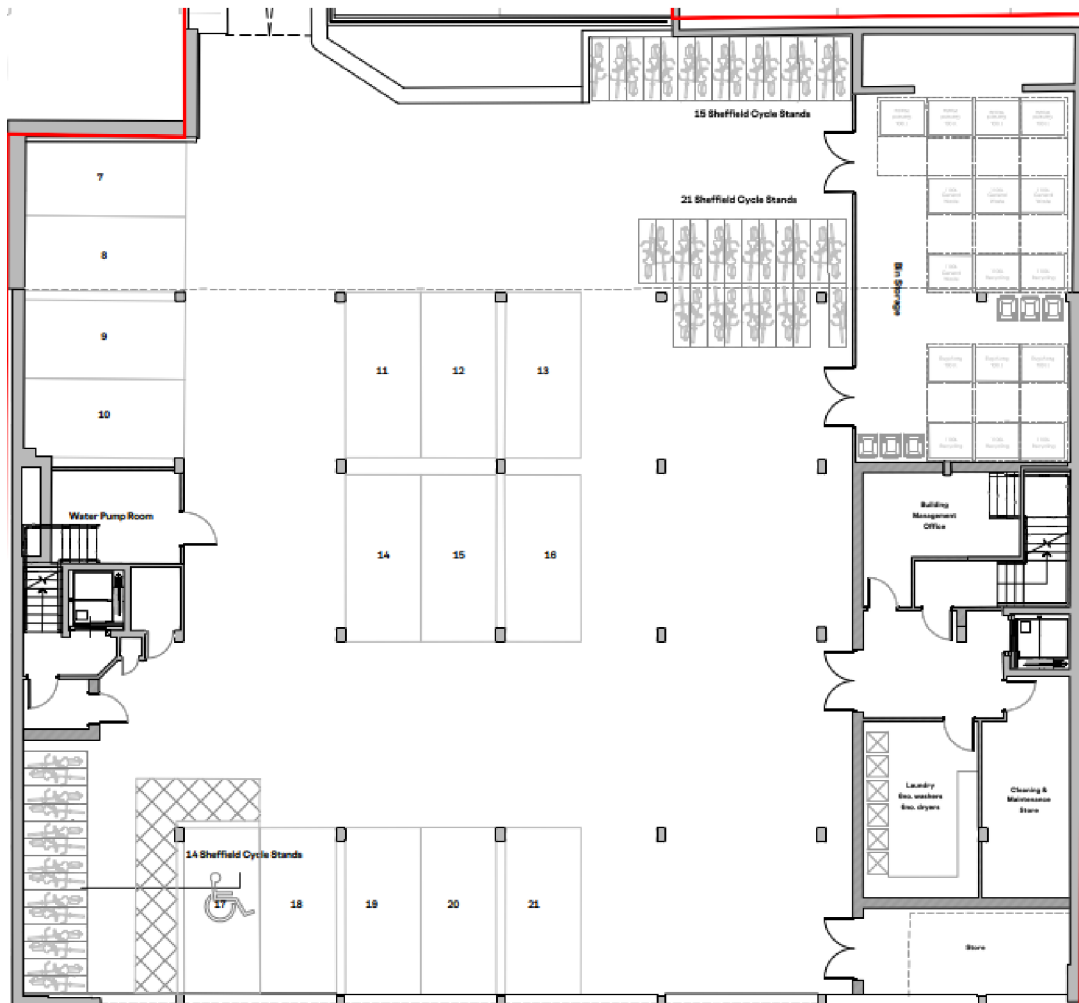


Proposed Elevations



The proposal would facilitate an addition 6no. flats which are in the form of 4no. 1-bed 2-person studio units and 2no. 2-bed 3-person apartment units. The lower ground floor plan has been amended to create additional cycle storage for the new units and also includes, parking, laundry room and bin store to serve the whole building.

Proposed Lower Ground Floor



Housing need

Hopkins Homes Ltd v Secretary of State for Communities and Local Government [2017] 1 W.L.R. 1865, Lord Carnwath reemphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that planning applications should be determined in accordance with the development plan. Paragraph 12 of the NPPF expressly states that the starting point for decision-making is the development plan. Lord Carnwath as part of the Supreme Court decision stated,

It is important, however, in assessing the effect of the Framework, not to overstate the scope of this policy-making role. The Framework itself makes clear that as respects the determination of planning applications (by contrast with plan-making in which it has statutory recognition), it is no more than "guidance" and as such a "material consideration" for the purposes of section 70(2) of the 1990 Act... It cannot, and does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort, the statutory scheme.

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing land supply statement in March 2023, it demonstrates that based on data up for the period 2022-2027, the Council can only demonstrate a land supply of 2.9 years.

Given the Council's current inability to demonstrate a 5-year housing land supply, 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) (2024). 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 strong 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

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 paragraph 194) and/or designated as Sites of Special Scientific Interest;
- Land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75);
- 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, 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.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the NPPF and established local planning policy taken as a whole.

Principle Issues

Policy CS02 of the Core Strategy 2014 prioritises development in the urban area as a sustainable location for development. No. 44-46 The Grove lies close to the town centre boundary of Gravesend and therefore the principle of residential development as proposed would generally be supported. Furthermore, the residential conversion of part of the proposal building has already been approved under a previous prior approval application (see above).

Policy CS05 relates to the Town Centre Opportunity Area and within this area states that the Council will:

- *Support the provision of new residential development where a satisfactory living environment can be achieved; and*
- *Support the redevelopment of under-used sites where this makes more efficient use of the sites and improves townscape character.*
- *Support existing retail, commercial and service functions on the ground floors and the provision of offices and residential uses on upper floors subject to achieving a satisfactory living environment.*

Policy CS07 is relevant to the economy, employment and skills, and states that:

“Development resulting in the loss of B class employment floorspace will not be supported unless otherwise allowed for by policies set out in the Core Strategy or where:

- *the proposal will deliver at least an equivalent number of new jobs on-site or elsewhere within the Borough and the proposed use is consistent with other policies set out in this plan; or*
- *the existing premises are no longer suited for employment purposes or are incapable of being made suitable at reasonable cost and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5); or*

- *the existing premises have an unacceptable environmental impact on the area within which they are situated and this is incapable of reasonable mitigation or the environmental benefit that would arise from the existing use stopping would outweigh the potential loss in employment.”*

The building has already received prior approval for conversion of Use Class E (office space) to residential, therefore the principle of creating additional units to the existing residential building, would be acceptable.

As such, the main issues for consideration in the determination of this application are as follows:

- Loss of commercial use
- Design, character and appearance
- Residential amenity
- Parking and highways

Loss of Commercial Use

The NPPF 2024 states at paragraph 90 that planning decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

The building was in previous use as offices which falls under Use Class E. The recent prior approval allowed for the change of use of the building from Use Class E to residential and therefore the loss of the commercial space is deemed acceptable and does not form part of this application. Therefore the proposal complies with the requirements of this policy.

Design, Character and Appearance

Section 12 of the NPPF 2024 relates to achieving well-designed and sets out the Government's requirements in relation to design issues. Paragraph 131 emphasises the importance of achieving high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 135 of the NPPF 2024 also seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

The property lies within the urban boundary and comprises of a four storey building with parapet wall and flat roof with structures for plant room and storage. Overall the building does not have any historic or architectural features and in terms of design, does not enhance the character of the area or the streetscene. The site lies within a short distance of the main town of Gravesend.

Front Elevation:



Rear/Side Elevation:



Opposite is a similar style building, Stephenson House, which is in residential use. To the north east is the Gravesend Delivery Office which is a Grade II Listed Building. The remainder of the streetscene is made up of period properties which are a mix of commercial and residential use.

Stephenson House (directly opposite)



The existing building has a flat roof with parapet wall and a plant and equipment store that measure over 3.4m in height. The proposed roof extension would have a height of 3.45m and as such would not extend any higher than the existing plant room and would lend itself to more of an infill extension. The proposed mansard roof design would have less bulk and mass than if the extension would be of the same design and the existing building and reflect other roof extensions within the Borough. The building opposite (Stephenson House) has similar roof extension to the one proposed and this building underwent a similar conversion and roof extensions to the current proposal under several planning applications; (20070421 (full planning), 20140321 (prior approval), 20150454 (full planning for roof extension), 20150561 (prior

approval), and 20160070 (prior approval)). Therefore the proposal has incorporated design features of the immediate streetscene and would not be out of character with the area and streetscene as a whole. Materials would need to be carefully considered and as such a condition for submission of materials will be added to any forthcoming permission.

Overall it is considered that the proposed roof extension has a respectful and subservient appearance and would result in an improvement to the existing roof and structures.

The proposal is considered to be appropriate in terms of their size, scale and appearance, and will respect and enhance the character and appearance of the area. As such, the proposals would comply with the requirements of Policy CS19 of the Core Strategy 2014.

Residential Amenity

The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). Paragraph 198 of the NPPF 2024 seeks to ensure that new development takes into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land and avoid adverse impacts from pollution.

Future Occupiers

The Nationally Described Space Standard (NDSS) 2015 sets out the minimum gross internal floor area (GIFA) standard for new dwellings.

Whilst there is no standard for studio apartments, all of the 1-bed units would exceed 37m² minimum and the 2-bed units would exceed the 61m² 2-bed 3 person unit.

It is considered that the proposal would comply with the Technical Housing Standards - Nationally Described Space Standards in terms of the size of the proposed accommodation for the units proposed.

All habitable rooms have good access to outlook and natural light.

The area is predominantly residential with the Royal Mail Sorting Office located opposite and a children's nursery adjacent, and it is therefore considered that the living conditions of any future occupants would not differ from the existing surround residential dwellings. As the whole building is now permitted as residential use, there would be no detrimental impact on the amenity of future occupiers in terms of the buildings previous office use.

Waste storage for the property would be provided within the lower ground floor area, together with bin storage and laundry facilities. As such it would comply with Policy CS19 of the Core Strategy 2014, which requires new development to incorporate facilities for the storage and recycling of waste generated. The details of the bin store should be conditioned to be carried out as approved.

Neighbouring Properties

In terms of the impact on neighbouring properties, the principle of further residential use at fourth floor is acceptable and therefore the proposed use would be in keeping with this.

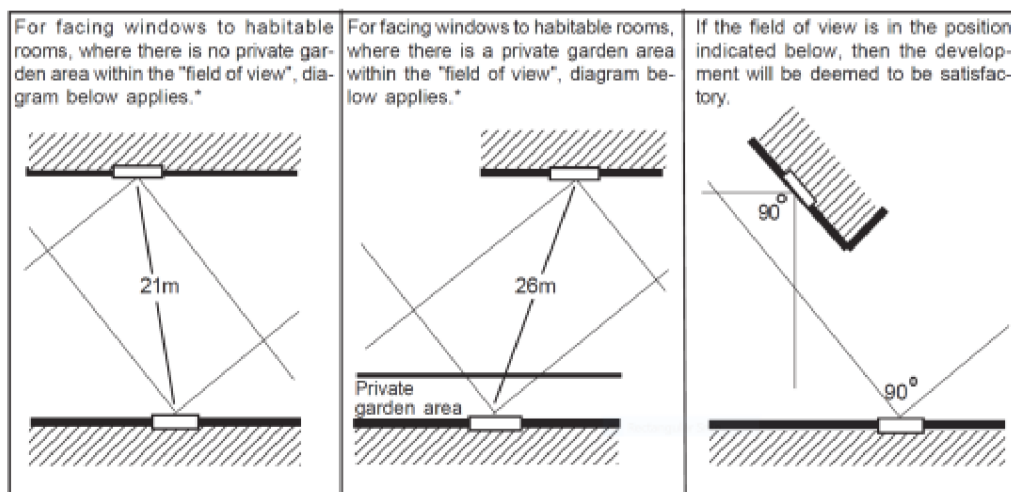
As already covered earlier in this report, the existing building has permission under the prior approval procedure for residential use. Therefore the existing windows would serve residential units that would benefit from views over the surrounding streetscene and properties. The proposed extension would not significantly alter this position and would afford the same views as the existing windows within the building.

The proposed balconies are all inset and do not project further forward than the main elevations. As such, the views afforded over the surrounding properties and gardens, would not significantly differ from the existing windows. In addition, the rear balconies which would benefit from most of the views of private areas. The first floor and above of the building is set approximately 7.5m from the rear boundary of the nearest gardens and 13.77m from the nearest windows. In addition, due to the orientation of the building and the relationship with the neighbouring properties, together with the height of the windows and balconies, there would be no direct window to window relationship. The rear facing windows and balconies would predominantly only have direct views over the existing car park and rear entrance. Furthermore, the rear balconies are inset from the side elevations by more than 2m on both sides.

The Gravesham Residential Layout Guidelines stipulates that a gap of between 21 and 26m is retained to avoid unacceptable overlooking, however in a built-up urban area such as this, this distance would be difficult to achieve, and it must be acknowledged that the existing windows of the building would already afford views over the neighbouring properties and gardens, as do the existing properties along The Grove. It is not considered that the additional floor and residential units would result in further or exacerbated levels above this.

Excerpt from the Gravesham Residential Layout Guidance SPD 2

Figure 1



With regard to overshadowing, the supporting documents of Daylight and Sunlight Assessment concluded that there would be no detrimental level of overshadowing. Due to the presence of the existing parapet wall and plant room structures, together with the existing building itself, the proposed development would not result in any detrimental additional overshadowing or loss of outlook or natural light, above what is already experienced.

On this basis, the proposal would comply paragraph 135, 198 and 200 of the NPPF 2024 and Policy CS19 of the Core Strategy 2014 in respect of amenity.

Noise

The proposal is for six additional residential units located within a predominantly residential area. There are residential properties located to the sides and rear and therefore the principle of residential development is acceptable as previously discussed. Opposite the site is the Royal Mail Sorting Office which could give rise to noise and disturbance. A noise impact assessment was submitted with the application and the details within the report are considered acceptable. A post completion noise survey would need to be undertaken and testing to assess performance of the noise mitigation measures against the noise levels as set in the Report. A condition will be added to the decision to this effect.

With regard to the balconies, these are inset and would serve the main living areas. The site is not located

in an AQMA and therefore the flats having openable windows and doors is considered acceptable. As the resident has a choice of whether to experience the noise or not i.e. they can close the balcony doors, therefore there is no objection to balconies in areas where the issue is noise rather than air quality. A condition will be added to the decision to ensure the bi-fold doors are of a design to comply with the agreed noise mitigation scheme.

Parking and Highways

The application includes parking on the lower ground floor and to the rear of the building. The site is located close to Gravesend town centre, close to a variety of shops and services and because the site is accessible by public transport, there would be no significant adverse impact on highway safety or parking as a result of the proposal, which would be in line with Policy CS11 of the Core Strategy 2014 and Saved Policy P5 of the Local Plan 1994. Whilst the comments of the neighbours are taken into consideration, there has been no objection to the parking provision from KCC Highways and Transportation.

Six additional bicycle parking spaces have been provided for the residents and would meet the minimum rate of one space per unit (as per the standards in SPG4). This should be conditioned to be provided as proposed.

Any Other Material Planning Considerations

Impact on Listed Building

To the northeast of the site is the Gravesend Delivery Office which is a Grade II Listed Building. The application site is an existing building which already has prior approval for residential use, and the scope of the proposed development is limited to the roof only. As such, due to the extent of the proposals and the distance and relationship of the application site and the Grade II Listed Building, there would be no detrimental impact on the setting of the nearby listed building.

The development would therefore comply with Policy CS20 of the Core Strategy 2014 and Section 16 of the NPPF 2024.

Birds

As the application site is within 6km of the Thames Estuary and Marshes SPA/Ramsar Sites and would provide additional residential accommodation, the proposed development is likely to have a significant effect, either alone or in-combination, on the coastal North Kent Special Protection Areas (SPAs)/Ramsar sites from recreational disturbance on the over-wintering bird interest. On this basis a tariff of £337.49 is required every additional dwelling proposed on the site.

The applicant has signed a SAMMS Contribution Agreement and paid the appropriate tariff for the development, which would meet the requirements of paragraphs 187 and 194 of the NPPF 2024 and Policy CS12 of the Core Strategy 2014.

Biodiversity Net Gain (BNG)

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain

objective is met (“the biodiversity gain condition”). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

In this case, the proposed development is covered by an exemption: it is a development below the threshold as it does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat and 5 metres of on-site linear habitats such as hedgerows. There is no existing ‘habitat’ on the site, and any space that could be used as such measures 10m². BNG is therefore not required in this case.

Conclusion

The proposals are acceptable in terms of the design and impact on the application building and the character and appearance of the surrounding area, and with regards to residential amenity and highways and parking matters. The proposals would therefore comply with the requirements of Policies CS11 and CS19 of the Core Strategy 2014, saved Policies T1 and P3 of the Local Plan 1994, and paragraphs 116, 131, 135, 198 and 200 of the NPPF 2024.

Recommendation

The application is accordingly recommended for permission with conditions.

(For detailed conditions and informatives, see draft Decision.)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	19 th September 2025	Dated:	19th September 2025