

31 January 2024



Reading
Borough Council
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Title	PLANNING APPLICATION REPORT
Ward	Tilehurst
Planning Application Reference:	231644/REG3
Site Address:	Park Lane Primary School (Infants), School Road, Tilehurst
Proposed Development	Demolition of an existing modular building and installation of a double stack modular building (GIFA approx. 360sqm). Further internal refurbishment of a number of rooms within the existing main building with modifications to external areas, including new play areas, replacement boundary and internal fencing and a new pedestrian access off School Road, to segregate vehicles and pedestrians entering the site, with new staff car parking.
Report author	Julie Williams – Planning Manager
Applicant	Reading Borough Council - Education
Deadline:	10 January 2024 – Extended to 9 February 2024
Recommendations	Grant full planning permission for temporary period of 5 years subject to conditions as follows:
Conditions to include	<ol style="list-style-type: none">1. <i>In accordance with approved plans</i>2. <i>Implement within 3 years</i>3. <i>Temporary permission – reinstatement after 5 years unless extended</i>4. <i>Materials as shown on approved plans</i>5. Construction Methods Statement (to be submitted before start)6. Vehicle Parking (with EV points) as specified before occupation.7. Car Park Management Plan (to be submitted and followed)8. Cycle Parking Plan to be approved and implemented9. Pedestrian footpath provided before occupation of new unit10. Gates provided to open into the site, away from the highway.11. Within 5 months of first occupation of the development hereby approved, a review of the School Travel Plan shall be submitted to and approved in writing by the Local Planning Authority.12. Arb Method Statement to be submitted and approved before any works commence on-site13. Landscaping to be approved and implemented including new trees14. Ecological enhancements to be approved and implemented15. SUDs to be approved and implemented

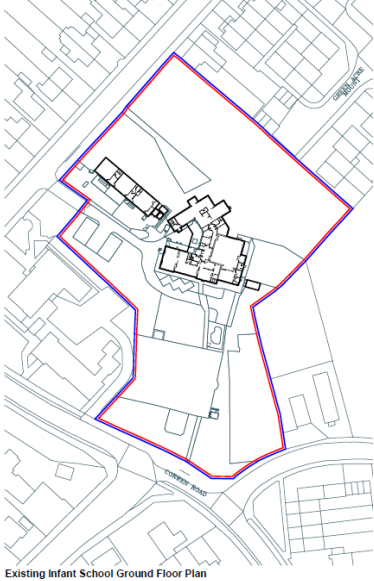
Informatives to include	<p><i>1 Terms</i></p> <p><i>2 Positive and Proactive</i></p> <p><i>3 Applicants responsibility to seek renewal before 5 years expires</i></p>
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1. Executive summary

- 1.1. This proposal is part of a project to provide improvements to both the Park Lane Infant and Junior Schools. It is proposed to demolish the Year 6 annex (located in a prefab building on Downing Road – see application reference 231707) and relocate the Year 6 classrooms within the Junior building. To create the space required it is proposed to relocate Year 3 classes from the Junior school to the Infant school with additional classrooms at that site. The proposed work at the Infants School is the subject of this planning application.
- 1.2. It is proposed to demolish a single storey modular building and replace it with a double stack modular building (approx. GIFA 360 sqm). Further, internal refurbishment of a number of rooms within the existing main buildings are proposed.
- 1.3. Concerns have been raised regarding loss of trees and replacement planting and impact on a Green Link on site. Officers are satisfied that the applicant is working to overcome these and therefore if not provided in time for your meeting delegated authority is sought to grant planning permission subject to acceptable responses to these concerns being provided.

2. Introduction and site description

- 2.1. As the application is submitted on behalf of Reading Borough Council the determination of the application rests with Planning Applications Committee. The officer recommendation is to grant planning permission as applied for with conditions.
- 2.2. Park Lane Infants School is situated on a site that extends from School Road through to Corwen Road, wrapping behind Tilehurst Library and other uses. The main school building is in a converted (many years ago) Victorian house located in the middle of the site. To the north of this lies a grassed playing field, which adjoins a small recreational park on the east side. A hard surface playground lies on the area to the south of the main building. An existing single storey modular building lies on the east side parallel to a vehicular entrance drive leading from School Road.
- 2.3. Further to the south along School Road lies the Park Lane Junior School building.



Location Plan



Existing layout

3. The proposal

- 3.1. Additional teaching spaces are proposed for the Infant school through the demolition of an existing modular building and installation of a double stack modular building relocated from Alfred Sutton Primary School (GIFA approx. 360sqm).
- 3.2. Further internal refurbishment of a number of rooms within the existing main building are proposed, along with modifications to external areas, including new boundary and internal fencing, a new soft play area and a new pedestrian access off School Road, to segregate vehicles and pedestrians entering the site.
- 3.3. A new 14 space car park will provide additional off-street parking for staff. This will include the adaptation of the existing car park to provide 2no. accessible bays and a further 2no. standard bays. 3no. existing bays, located adjacent the school, will no longer be allocated for parking to avoid pupil/ vehicle conflict. In total 20no. standard parking bays and 2no. accessible parking bays are proposed; an increase of 9no. and 2no. respectively.
- 3.4. Some vegetation and tree clearance is required but only trees and vegetation claimed of low value to be removed. New tree planting is proposed to replace those removed as well as shrub planting along one boundary edge.

4. Planning history

141473/REG3– Replacement boundary fence. Granted 14.11.14

121190/REG3 – Single storey timber constructed out door classroom. Granted 26.4.12

5. Consultations

Statutory:

- 5.1. None.

Non-Statutory

Transport

The proposed external works comprise:

- Inclusion of a new 11 bay car park, inc. 2no. Accessible spaces and 2no. EV charging spaces
- Extension to existing car park (2 additional bays)
- Construction of a pedestrian path into the site from main public footpath (along School Road)

The existing vehicular access and intercom gate will be retained, with a further manual vehicular gate introduced to prevent unauthorised vehicular access proceeding past the main school building. A new, dedicated pedestrian entrance and footpath will be provided to segregate pedestrian access from School Road to the main school office. The footpath will be an asphalt surface, 1.8m wide.

The applicant has confirmed that the Infant school will have 24 FTE staff members with Year 3 moving to this site, whilst the Junior school will have 20 FTE. The staff car parking will expand at the infants from 11 spaces to 22, including 2 accessible spaces and 2 electric vehicle charging spaces that had not previously been provided. A new staff car park, with a separate gated access, adjacent the existing vehicle access, is proposed.

The total number of staff spaces across both schools would be 28, with a car parking ratio of 1 space per 2 FTE members of staff which is under the Council's maximum Parking Standards and, therefore, deemed acceptable.

The applicant has stated that it is the intention to provide a holistic staff parking provision to be shared across the whole Primary School (infant and juniors). A parking management plan is recommended to ensure that teachers are allocated spaces rather than driving between the two sites seeking for parking availability. However, I am happy to deal with this via condition.

Deliveries and refuse vehicles enter via the main vehicular gate to the west but stop short of the playground, with deliveries and refuse dealt with away from the pupil pedestrian link between the main building and playground. There is also a service gate to the playing field which is used for maintenance access. It is stated that the proposals do not affect the existing waste collection procedures at the school and the arrangements will continue as they currently do.

The school currently has a Travel Plan accredited until 4/2/24. Given that Year 3 pupils will be relocating from the junior school site to the infant school site, the Travel Plan should be updated once the development has been completed.

Cycle parking provisions for staff and pupils should also be reviewed to ensure the right provision is provided on the infant school site. In accordance with the Council's Parking Standards, cycle parking provision should be provided at a ratio of 1 space per 5 FTE staff and 1 space per 15 pupils (years 1-3) and 1 space per 10 pupils (years 4-6). However, I am happy to deal with this by condition.

A Construction Method Statement is required and should be submitted and approved before any works commence on-site given the constraints of the site. However, I am happy to deal with this by condition.

The proposed sustainable drainage scheme is acceptable although it is suggested that thought be given to making better use of surface water for landscape maintenance.

Natural Environment

Trees

With reference to **Arboricultural Impact Assessment V1 dated July 2023 (09/08/23) from RPS Group**: The report confirms there are no dead or dying (category U) trees.

Page 12 confirms that *'8 trees will require removal to accommodate the proposed development works: T6, T7, T43, T44, T64-T67'* – all category 'C' trees, deemed not to be a constraint to development. It should be noted that trees within a tree belt are often not category A or B trees due to growth suppression by adjacent trees; they do, however, contribute to the amenity and integrity of the arboricultural feature. The trees to be removed consist of all semi-mature trees – 2 Silver birch, 2 Ash, 2 False acacia and 2 Norway maple. Considering the comments on the trees within the survey, their removal is acceptable from a tree quality point of view. However, they form part of a tree belt or trees that have grown up together and no comment is provided on the potential impact on adjacent, retained trees who will be open to greater wind forces and potential damage – further tree loss could therefore result from their removal. Please note additional comment of extent of tree loss in the landscape section below.

Necessary tree works to facilitate development and its construction are listed on page 12 which seem reasonable.

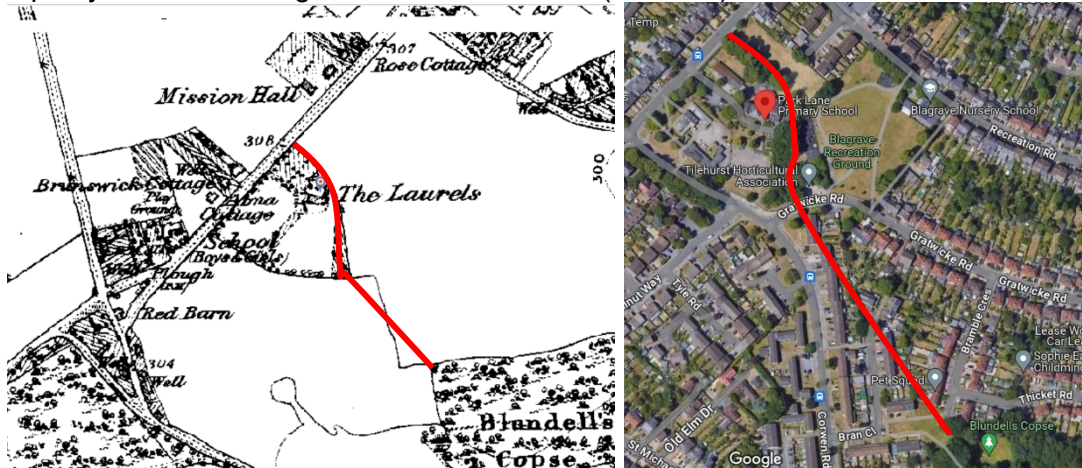
Page 13 lists incursions in RPAs of retained trees and confirms there will be incursions necessary into the RPA of 8 trees (T10, T51, T52, T53, T54, T57, T59, T60), with the table showing the nature and extent of the incursion; being significant for 5 trees for hard surface or porous surface installation – particularly significant for T10. The introduction of new hard surfacing is unwelcome and detrimental to a tree's rooting environment hence these elements are undesirable. It is fortunate that the extensive incursion (55%) into the RPA of T10 includes conversion of hard to soft and porous surfacing, hence improving the rooting environment.

It is stated that new hard surfacing will be constructed using a 'no-dig' methodology, albeit it doesn't then confirm intended use of cellular confinement system, as would be expected.

Incursion into RPAs for foundation construction is accepted in the report, with any roots found being severed and the trees thereafter being monitored. This is not an acceptable resolution, particularly as the two RPAs are of two of the few A category trees on site (T54 & T57 Limes). This required further consideration.

It is stated that 'the Year R shed to be relocated in the RPA of T51 will be secured in place using raft foundation techniques'.

It is interesting to note that a tree belt has existed since at least 1880 and, as you know, it partly forms the designated Green link here (re EN12):



The removal of trees within this belt not only raises the concern about the impact on the remaining, but will degrade the belt of trees. There are also biodiversity concerns as set out by GS Ecology, who have rightly queried the need for the outdoor shelters in the proposed locations, which results in tree loss with no replacements in that location.

In conclusion, in relation to tree loss, whilst the quality of trees to be removed is not concerning, there are other issues detailed above. In relation to incursions into RPAs for hard surfacing, this is unwelcome and is a detriment to tree rooting areas, however it is acknowledged that methods and specifications are available to minimise the harm. The incursions for foundations have, however, not been properly considered and are not currently acceptable.

Landscaping

As confirmed in the DAS & AIA, 8 trees are to be removed – all semi-mature, at least 4 of which are considered to be 'large canopy' trees (Ash & Norway maple). However, Proposed GA Plan Rev P3 appears to indicate the removal of some 10 trees in the play area and two west of the new building hence clarity is required.

The GA plan indicates the planting of 8 new trees – 1 on the play area and 7 around the car park and new building. This either provides a neutral tree number or a loss depending on confirmation of tree number to be removed. In any case, it does not provide the net gain in tree number required of any development. As Council owned land we should be seeking a 3:1 replacement strategy, as per the adopted Tree Strategy. Proposed landscaping is therefore not acceptable as a net gain has not been demonstrated contrary to EN14 and aims of the adopted Tree Strategy and to EN12 requirements (as per GS Ecology comments).

Conclusion

The application can neither be supported on tree or landscape grounds at the moment as it fails to demonstrate lack of harm to retained trees, tree loss in itself is of concern and proposals fail to demonstrate a net gain in tree number, hence the proposals are contrary to EN12, EN14 and the adopted Tree Strategy. Satisfactory revisions and responses to the concerns raised are required in order to show compliance with policy and the Tree Strategy.

Case Officer notes: The applicant was invited to respond to these comments and to submit amendments if possible to address concerns raised. See appraisal.

Ecologist

Scheme design

The primary school site is located on a green link as per policy EN12 which states:

b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

* Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and

* Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.

The proposals include the loss of 8 trees. These are in the area marked: “Relocated/proposed Year R canopy area details for Year R sheltered play area with relocated Year R sheds”. The loss of these trees will result in a net loss in biodiversity units and to comply demonstrate that the proposals comply with the mitigation hierarchy (as set out in EN12 above), particularly as the site is on a green link, the applicant would need to demonstrate why the sheds and play area cannot be located elsewhere and why the trees need to be removed.

Protected and priority species

The ecology and BNG report (HCC Ecology Team, November 2023) concludes that the proposals are unlikely to adversely affect priority habitats or protected species subject to the implementation of mitigation measures within the report.

These measures, which include vegetation clearance undertaken outside the bird nesting season (March to August inclusive), the creation and preparation of stag beetle habitats on site and translocation of stag beetles, larvae and existing dead wood to the new location would be sufficient to ensure that the risk of the works affecting protected species remains minimal. The recommendations should be secured through a planning condition once the issues below have been addressed.

Biodiversity Net Gain

We asked that the excel version of the Biodiversity net gain spreadsheet was sent over and this has now been received.

The excel sheet provided shows that there will be a loss of biodiversity on site and it is proposed to offset this loss at the associated junior school where a single storey annex building is to be demolished. The report states “Off-site biodiversity proposals are included, and together with on-site measures, the development would result in no net loss of biodiversity for area-based habitats, and a 20.42% increase in the biodiversity value of linear habitats.”

Comments regarding onsite provision:

As the trees are within a green link the strategic significance should be “Formally identified in local strategy” It is not clear from the spreadsheet how the trees (and subsequent loss of trees) has been accounted for in the metric (the spreadsheet includes three entries for trees in the baseline habitat tab with a total area of 0.3181 ha and it appears that 0.2888 ha will be retained: a difference of 0.0293 ha. Using the urban tree helper app within the spreadsheet calculates that the loss of 8 trees is equivalent to the loss of 0.0326 ha (as a minimum). Please can the applicant supply details of which trees are to be removed and how this area has been calculated.

The Habitat creation tab includes 14 trees to be planted, however the plan in the report only shows eight and the accompanying report states that “The development will also result in the loss of eight trees. Eight new trees will be planted (as shown in the proposed plan), while a further six trees will be planted elsewhere either on-site or off-site, at the discretion of Reading Borough Council.” Please could the applicant confirm the arrangements for this as without these six trees, the calculation shows a net loss in biodiversity.

Comments regarding offsite provision:

The Off-site biodiversity provision includes new trees after proposed replacement of the annex building. Full details have not been provided and it is likely that the building would need to be assessed for bats prior to demolition – this information is not included in the report. i.e. very little information has been given about the offset area.

The report states: “This offsite area is currently all either hardstanding or existing building of no biodiversity value in BNG terms. While part of this will remain as cleared ground pending future proposals, part of the site will be redeveloped as additional car parking.”

However, images from Google maps show that this part of the site appears to include an area of grassland, flower beds and is bordered by lengths of hedging.

Summary

It has not been demonstrated that the proposals will result in a net gain in Biodiversity Units and that the mitigation hierarchy has been followed and as such that the proposals comply with policy EN12.

Case Officer notes: The applicant was invited to respond to these comments and to submit amendments if possible to address concerns raised. See appraisal.

Environmental Protection Officer:

No objections raised – conditions linked to construction phase recommended.

5.2. Public

Those living opposite the school on School Road and on Green Acre Mount plus Tilehurst Library consulted by letter and site notices displayed. One letter of support for the proposed development received.

6. Legal context

6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) which states at Paragraph 11 “Plans and decisions should apply a presumption in favour of sustainable development”.

6.2. The development plan for this Local Planning Authority is the Reading Borough Local Plan (November 2019). The relevant policies are:

CC1: Presumption in Favour of Sustainable Development
CC2: Sustainable Design and Construction
CC7: Design and the Public Realm
CC8: Safeguarding Amenity
EN12: Biodiversity and the Green Network
EN14: Trees, Hedges and Woodland
TR3: Access, Traffic and Highway-Related Matters
TR4: Cycle Routes and Facilities
TR5: Car and Cycle Parking and Electric Vehicle Charging
OU1: New and Existing Community Facilities

Relevant supplementary planning documents are:

RBC Supplementary Planning Documents
Revised Parking Standards and Design (2011)

Other relevant documentation
Reading Tree Strategy (2021)
Reading Biodiversity Action Plan (2021)

7. Appraisal

7.1 The main considerations are:

- Land use Considerations
- Design considerations
- Amenity – Neighbours.
- Transport and highways
- Natural environment – Trees, landscaping & Ecology
- Other Matters

Land use considerations

7.2 The land, the subject of this application, is currently used for the school and therefore as the proposals will not change how the land is used and is intended to improve the school and benefit an existing community facility it is in accordance with Policy OU1. There are no in principle concerns raised with the proposed development.

Design considerations

7.3 The proposal involves relocating a double stacked modular unit from another school (Alfred Sutton Primary School) to this site. While it is accepted that making use of unused modular buildings from another site makes economic and possibly sustainable construction sense the use of temporary structures is not normally encouraged as a permanent design solution. This is particularly relevant on the School Road frontage site, which makes a valuable contribution to the character and appearance of this part of Tilehurst District Centre.

7.4 However, as can be seen from the image below, the site is already occupied by a collection of temporary huts, which would be replaced by the single unit as also illustrated below.



Existing site seen from School Road



Same view but with artist image of new modular unit

- 7.5 The proposal seeks to mitigate this potential harm by siting the new two storey unit further back and parallel to the frontage retaining the hedge and with new trees planted. The Laurels (Victorian) building is set further back in the site so the new building would be more readily seen from public views in context with the more modern Tilehurst Library building. Alternative siting has been explored and officers are satisfied that the proposed layout is the most practical use of the site, enclosing circulation and play space for the children and requires fewer trees to be lost.

Neighbour amenity

- 7.6 There are residential properties on the opposite (west) side of School Road, but School Road is a busy commercial street and therefore it is unlikely that the proposed parking area or new school accommodation would lead to a worsening of amenity for these neighbours or the adjacent library to the south. The playing field and tree belt separate the site from houses on the east side of School Road and Green Acre Mount. Officers are therefore satisfied that the proposed development will have minimal impact on these residents. A condition is recommended to manage the construction phase in accordance with Policy CC8.

Transport and Highway Matters

- 7.7 As described above in the comments section the proposed development to enable the redistribution of classes from the Junior School to the Infants School includes the provision of a new 11 bay car park, inc. 2no. Accessible spaces and 2no. EV charging spaces, an extension to the existing car park (2 additional bays) and the construction of a pedestrian path into the site from School Road.
- 7.8 The applicant has confirmed that as part of this work they intend to provide a holistic staff parking provision to be shared across the whole Primary School (infant and juniors). A parking management plan is proposed (recommended to a condition) to ensure that teachers are allocated spaces rather than driving between the two sites seeking for parking availability.
- 7.9 The school's current Travel Plan will need to be updated once the development has been completed.
- 7.10 Cycle parking and scooter parking proposed for staff and pupils should also be reviewed to ensure the right provision is provided on the infant school site and this is also recommended to be a planning condition to ensure that the new scheme is properly catered for.

Natural Environment and Ecology

- 7.11 As set out in the comments above, the Natural Environment officer and consultant Ecologist have raised concerns and asked questions about the proposed development and its impact on the existing trees and other habitat areas.
- 7.12 The applicant has provided their response and in respect of the concerns about incursions within root protection areas (RPAs) sympathise with these concerns but have tried to balance the requirements of the school with protecting the trees. They confirm that their proposals include mitigation to reduce any impacts and to maintain the health of the retained trees. Additional trees are now proposed to be planted within the belt of trees to address tree loss and biodiversity concerns. While the requirements of the school make it difficult to offer a solution that is fully free from incursions they have been able to identify locations for 18 replacement trees to be planted to compensate for the 8 tree losses through this application.
- 7.14 It is acknowledged that the benefits to the school and local community from the proposed development and re-distribution of the classes is well supported by Policy OU1. This benefit and given that this is an existing school site are seen to outweigh the concerns raised in terms of the natural environment. However, in the interests of the overall success of the project for the wider community Officers are keen to see if a better balance could be achieved between the school's needs and the contribution that this site makes to the local landscape and bio-diversity and those relevant policies. As amendments were provided as this report was being completed the full response from consultees and the applicant will be provided in an Update report at your meeting.

Equality implications

- 7.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to—
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.2. The key equalities protected characteristics include age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation. It is considered that there is no indication or evidence that the protected groups have or will have different needs, experiences, issues and priorities in relation to this particular application.

8. Conclusion

8.1 The proposed demountable double height class room block at the Laurels (Park Lane Primary) in the general location of existing (and to be demolished modular units) has been considered in terms of relevant land use policies and improving community facilities. It has been found to be acceptable in transport terms and while concerns have been raised about the loss of 8 trees required and potential harm to some retained these has been responded to by the applicant. Additional replacement trees (18 all on site) are now proposed – albeit note comments in para. 7.14.

8.2 Any harmful impacts of the proposed development have been weighed against the benefits in the context of national and local planning policies and the officer advice is that the planning balance weighs in favour of granting temporary planning permission but with conditions requiring further information regarding improved landscaping and bio-diversity enhancements. As such, this application is recommended for approval.



Proposed Layout Plan



1 - Aerial View 2 - Facing North East

1. The proposed development is a new school building and play area. It is located on the site of the former Park Lane Infant School. The site is bounded by Park Lane to the north, Church Lane to the east, and the railway line to the south. The development will include a new school building, a play area, and a secure line. The site is currently vacant and is surrounded by residential properties. The development will be a two-story building with a flat roof and large windows. It will be surrounded by trees and landscaping. The play area will be located to the west of the school building. The secure line will be located to the east of the school building. The development will be a significant improvement to the school and will provide a safe and secure environment for children. The development will also provide a new play area for children. The development will be a significant improvement to the school and will provide a safe and secure environment for children. The development will also provide a new play area for children.



1 - Perspective view, KS1 Building and play area facing west



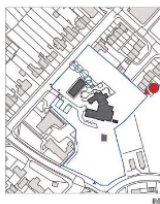
2 - Perspective View, School entrance - facing east



3 - Perspective View, Secure line and new KS1 building - facing north

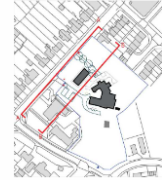
PLANNING APPLICATION	21/03/2024	AM	PG
Hampshire County Council			
PROJECT NAME: E05023 Park Lane Infant School Improvement Works			
DRAWING NAME: Aerial Sketch View and Perspective View			
SCALE	DRAWN	CHECK	APPROVED
N/A	JM	RPS	PG
PROJECT REF: E05023-HCC-22-VIS-A-1819			
DATE: 21/03/2024			
PLANNING APPLICATION			

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PLANNING APPLICATION	21/03/2024	AM	PG
Hampshire County Council			
PROJECT NAME: E05023 Park Lane Infant School Improvement Works			
DRAWING NAME: Aerial Sketch View and Perspective View			
SCALE	DRAWN	CHECK	APPROVED
N/A	JM	RPS	PG
PROJECT REF: E05023-HCC-22-VIS-A-1819			
DATE: 21/03/2024			
PLANNING APPLICATION			

Artist views of proposed development



Proposed Elevation AA



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Met

PLANNING APPLICATION	10/10/2020	10	10
DATE			

100 High Street
Hampshire County Council
Hampshire
County Council

PROJECT NAME
EB0223 Park Lane Infant School Improvement Works

SHEET NAME
0A Proposed Infant Elevations AA-BB

SCALE
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RPS
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DATE
10/10/2020

PROJECT NO
EB0223 HCC-02-22-DR-A-3010_P1_00

DATE
10/10/2020

PLANNING SUBMISSION

Proposed Elevation BB

Proposed Elevations



Proposed Elevation CC



0 5 10
Met

PLANNING APPLICATION	10/10/2020	10	10
DATE			

100 High Street
Hampshire County Council
Hampshire
County Council

PROJECT NAME
EB0223 Park Lane Infant School Improvement Works

SHEET NAME
Proposed Elevations CC-DD

SCALE
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DATE
10/10/2020

PROJECT NO
EB0223 HCC-02-22-DR-A-3011_P1_00

DATE
10/10/2020

PLANNING SUBMISSION

Proposed Elevation DD

Proposed Elevations