

<b>Application Number:</b>	2024/0063	<b>Application Type:</b>	Full
<b>Proposal:</b>	Erection of 1 bungalow to the rear of 19 Helmshore Road	<b>Location:</b>	19 Helmshore Road Haslingden Rossendale BB4 4BG
<b>Report of:</b>	Head of Planning and Building Control	<b>Status:</b>	For publication
<b>Report to:</b>	Development Control Committee	<b>Date:</b>	12 <sup>th</sup> November 2024
<b>Applicant:</b>	Mr/Mrs Harrington (C/O Agent: Steven Hartley)	<b>Expiry Date:</b>	25.04.2024 EOT agreed to 15.11.2024

<b>Contact Officer:</b>	<b>Claire Bradley</b>	<b>Telephone:</b>	<b>01706 238636</b>
<b>Email:</b>	<b>planning@rossendalebc.gov.uk</b>		

<b>REASON FOR REPORTING</b>	
<b>Outside Officer Scheme of Delegation</b>	
<b>Member Call-In</b> Name of Member: Reason for Call-In:	
<b>3 or more objections received</b>	<b>3+ objections</b>
<b>Other (please state):</b>	

## HUMAN RIGHTS

The relevant provisions of the Human Rights Act 1998 and the European Convention on Human Rights have been taken into account in the preparation of this report, particularly the implications arising from the following rights:

### Article 8

The right to respect for private and family life, home and correspondence.

### Article 1 of Protocol 1

The right of peaceful enjoyment of possessions and protection of property.

## 1. RECOMMENDATION

Approval subject to the conditions set out in this report.

### APPLICATION DETAILS

## 2. SITE

No.19 Helmshore Road is a semi-detached early C20 dwelling constructed from coursed stone with a slate roof. It has a bay window at ground floor level adjacent to a door, with a projecting cornice on consoles above, and a small window with a stone surround. The dwelling has a two-light stone mullioned window and a singular window at first floor level, all with ashlar stone surrounds. A lean-to garage is attached to the north side elevation. The dwelling is set back behind a front garden with a stone boundary wall.

The immediate area is predominantly characterised by semi-detached dwellings with gardens front and rear. The application site currently is the rear garden of No 19 Helmshore Road.

The rear of the dwelling is rendered with a single storey extension to the rear.

Materials in the area are predominantly natural stone and natural blue slate

The site is within the urban boundary of Haslingden and within the Haslingden Conservation Area.

## 3. RELEVANT PLANNING APPLICATION HISTORY

1975/0273: Kitchen, lounge extension and tool shed extension – Approved

## 4. PROPOSAL

The application is for the erection of a bungalow in the rear garden of no.19 Helmshore Road. The bungalow will be accessed via a private access way from Ryefield Avenue West.

The proposed bungalow will have a 'C' shaped plan with its main windows looking into an enclosed amenity space, contained by the wings of the building. A singular window will face outwards with obscured glass.

The bungalow will be constructed from pitch faced natural stone with natural blue slate tiles to the roof and will have an overall height of 4.42 metres, with an eaves height of 2.2 metres.

Between the rear garden of no.19 and the proposed dwelling, a 1 metre high natural stone boundary wall will be erected, with a 1 metre timber post and panel fence on top. Existing boundary treatments will be retained elsewhere.

A driveway will be created with a tarmac surface and Hydropave Tegula pavers will be used to create a paved area/walkway. A new lawn will be added to the amenity area and a section of the existing lawn will be retained. A 2.25 metre high wall in natural stone will be erected to enclose the amenity area.

The north, rear wall of the dwelling will face towards the side elevation of an existing bungalow on Ryefield Place. This wall will be a blank stone wall. The east elevation will contain the main entry door to the dwelling and a singular window. The south elevation will face into the garden area and will have full height windows/doors in black uPVC.

The east and west walls which face into the amenity area will both have a singular window and a full height window. The roof of the dwelling will slope inwards toward the central area. The dwelling will have three roof light windows.

## **POLICY CONTEXT**

### **National Planning Policy Framework**

- 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 9 Promoting Sustainable Transport
- Section 11 Making Effective Use of Land
- Section 12 Achieving Well Designed Places
- Section 14 Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Section 15 Conserving and Enhancing the Natural Environment
- Section 16 Conserving and Enhancing the Historic Environment

### **Development Plan**

#### **Local Plan Policies**

- Policy SS: Spatial Strategy
- Policy SD1: Presumption in Favour of Sustainable Development
- Policy SD2: Urban Boundary and Green Belt
- Policy HS1: Meeting Rossendale's Housing Requirement
- Policy HS4: Housing Density
- Policy HS8: Private Outdoor amenity space
- Policy ENV1: High Quality Development in the Borough
- Policy ENV2: Historic Environment
- Policy ENV4: Biodiversity, Geodiversity and Ecological Networks
- Policy ENV6: Environmental Protection
- Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality
- Policy ENV10: Trees and Hedgerows
- Policy TR4: Parking

### **Other material considerations**

- National Planning Practice Guidance
- RBC Alterations and Extensions to Residential Properties SPD (in respect of separation distances)

## 6. CONSULTATION RESPONSES

Consultee	Summary of Comments
LCC Highways	No objections subject to conditions
United Utilities	No objection
Growth Lancashire	See Visual Amenity/Heritage Section below for details
Ecus	Awaiting comments

## 7. REPRESENTATIONS

To accord with the General Development Procedure Order a site notice was posted on 19/03/2024 and neighbour letters were posted out 16/03/2024.

8 representations have been received on the following grounds.

Ryefield Place in the name of the bungalow erected in the 1960's not the road name.  
The access to this development is located on private, unadopted land.  
Will introduce additional traffic causing noise and disturbance.  
Construction vehicles will damage surface of private access.  
19 Helmshore Road has pedestrian access only to the back street  
The widening of the gate to allow vehicular access from the back street will encroach onto private land and driveways/access to garages.  
Will impact on privacy for neighbouring occupiers.  
Will increase density impact on the character of the area.  
Will result in the loss of yet another garden.  
Will impact on trees on the site.  
Will affect light to the neighbouring property.  
Then application site is at a lower level than the access and neighbouring property, not clear whether land is to be built up.  
Erection of the boundary wall would impact on trees and shrubs in neighbouring gardens.  
Will result in an imposing and overbearing development.  
Submitted decision is no relevance as it is outside the Conservation Area.  
Will result in over development of the garden area.  
The character of the private passageway will be impacted by providing access to the development  
Pedestrian safety will be impacted by the use of the passageway for additional vehicles.  
Proposal will not meet Manual for Streets in relation to the turning area.  
The proposed parking will obstruct access to neighbouring property.  
Excavations for walls will be detrimental to tree roots  
No replanting of trees specified  
Impact of shade from cast by a 4.4 metre high wall, at a length of 14 metres (North facing) and 2 x 3.4 metres (South facing) should be assessed  
Will impact on character of Conservation Area

There are also a number of comments which relate to private access rights and covenants which are private (non-planning) matters between the relevant parties.

## 8. ASSESSMENT

The main considerations in this case are as follows:

- 1) Principle;
- 2) Visual Amenity/Heritage Impact;
- 3) Neighbour Amenity;
- 4) Access, Parking and Highway Safety
- 5) Impact on trees

### **Principle**

At the heart of the NPPF and Local Plan Policy SD1 is a presumption in favour of sustainable development.

Paragraph 11 of the Framework makes clear that for decision taking this means:

- “c) *Approve development proposals that accord with an up to date development plan without delay; or*
- d) *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission 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.”*

The Council can demonstrate a five-year supply of deliverable housing sites. However, the Borough is not in a position to demonstrate that it is achieving the required level of housing delivery.

As such, this triggers paragraph (d) above. The Framework clarifies that policies that are most important to an application are considered out of date where local authorities cannot demonstrate that they are achieving the required level of housing delivery. The weight that is attached to such policies is a matter for the decision maker.

Strategic Policy SD2 contained within the Local Plan requires that Development in Rossendale should take place within the defined urban boundary unless it has to be located in the countryside and the development enhances the rural character of the area, subject to satisfying other relevant policies in the Local Plan.

This site is located within the urban boundary and within a sustainable location reasonably close to a bus route carrying regular services which provide links to town centres within the borough and further afield.

Given the site’s sustainable location within the defined urban boundary, the proposed development of a single dwelling on the site is acceptable in principle.

### **Visual Amenity/Heritage Impact**

The site is located within Haslingden Conservation Area.

Section 12 of the Framework refers to the importance which Government attaches to the design of the built environment:

- *“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. 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.” (Para 131)*
- *“Planning policies and decisions should ensure that developments...will function well and add to the overall quality of the area...are sympathetic to local character and history, including the surrounding built environment and landscape setting.” (Para 135).*

Section 16 of the Framework states local planning authorities should take account the desirability of new development making a positive contribution to local character and distinctiveness and the desirability of sustaining and enhancing the significance of heritage assets (such as Conservation Areas, as in this case).

Paragraph 203 of the National Planning Policy Framework requires that when *determining applications affecting heritage assets local planning authorities should take account of:-*

- a) *the desirability of sustaining and enhancing the significance of those assets and putting them to viable uses consistent with their conservation;*
- b) *the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) *the desirability of new development making a positive contribution to local character and distinctiveness.*

Policies ENV1 and ENV2 of the Local Plan seek to ensure that the built and historic environment is safeguarded and enhanced and proposals take into account design, lighting and materials.

The application is for the erection of a bungalow in the rear garden of no.19 Helmshore Road. The bungalow will be accessed via a private access from Ryefield Avenue West and will have a ‘C’ shaped plan with its main windows looking into an enclosed amenity space, contained by the wings of the building. A singular window will face outwards with obscured glass. The bungalow will be constructed from pitch faced natural stone with natural blue slate tiles to the roof.

The dwelling will have an overall height of 4.42 metres, with an eaves height of 2.2 metres.

The surrounding development is predominantly stone and maintains the constant use of natural slate to the surrounding roofs.

Growth Lancashire (the Council’s heritage consultants) have commented as follows:

*The area where the proposed dwelling is to be located is down a small road off Ryefield Avenue West, the road runs directly to the rear of the dwellings along Helmshore Road. This road appears as more of a driveway access between two dwellings, rather than a full road. From Ryefield Avenue West, there will be no/limited views of the proposed dwelling, however, the driveway/car parking area may be*

*visible; from Ryefield Place the northern rear wall of the proposed bungalow will be seen, as well as the east side elevation.*

*From the principal Helmshore Road elevation, the proposed dwelling will not be visible. The dwelling will mainly be visible from within the rear garden area of no.19. The dwelling will also likely be viewed from the rear garden of no.21.*

*The Haslingden Conservation Area boundary falls along Ryefield Place and includes the rear gardens of nos.19-21 Helmshore Road. The rear garden of no.19 Helmshore Road extends further back than the adjacent dwellings of no.17 and 15, historic mapping shows that the gardens have always been of this size. Any views of the scheme from the rear gardens of the dwellings to the north, south and west will be from outside the boundary of the conservation area.*

*Overall, the proposed dwelling will not be seen from any principal, key views within Haslingden Conservation Area. It will be viewed from Ryefield Place, which is a small, secondary road along which the conservation area boundary runs. The dwelling will mainly be viewed from within the garden area of no.19. Due to its design and 'blank' north elevation wall and mono pitch roof, the dwelling is unlikely to appear prominent from the Ryefield Place perspective. The use of natural stone and slate will allow the building to appear consistent with the surrounding dwellings. It is assumed that all windows/doors will be black uPVC, whilst it would be most appropriate for timber to be used, I feel that this issue is negligible due to majority of windows/doors being obscured from almost all views from within the conservation area. The scheme incorporates Staffordshire blue engineering brickwork, I feel that it would be more appropriate for a natural stone to be used as this is a more sympathetic material type.*

*Overall, I feel that the proposed dwelling will have a negligible impact on the character and appearance of Haslingden Conservation Area. It will be most prominently seen from the south end of Ryefield Place and from within the rear garden of no.19 Helmshore Road. From the key route along Helmshore Road, the dwelling will not be visible. I feel that the reduction in the size of the rear garden of no.19 will have a negligible impact on the conservation area. The design of the dwelling is simple and modern, using sympathetic building materials. Whilst its design does not contribute to the character or appearance of the conservation area, its location and orientation means that it will be largely hidden from view and as such I feel that its visual impact is minor.*

This proposal will introduce a C- shaped building into the garden area. However, the dwelling would be constructed from natural materials, with the boundary treatments being amended to natural stone also.

It is considered that this proposal would result in a development that introduces an unusual and irregular shaped dwelling into the existing garden of No 19 Helmshore Road. It will not be unduly prominent however from any public vantage points owing to its location, size, massing and orientation.

In assessing this against Local Plan Policy HS4, the current density of the area is 15.8 dwellings per hectare, and it will increase to 16.6 dwellings per hectare, which is in keeping with the surrounding area and will not harm the character of the Conservation Area.

In terms of remaining amenity space for 19 Helmsshore Road, this will inevitably be reduced, though having regard to several past appeal decision in the immediate area, the remaining area is considered acceptable in this case. The amenity space for the proposed dwelling itself is also acceptable.

There are a number of mature trees within the application site, namely 2 birch trees and a number of smaller trees

The proposed development will retain the largest tree (T1) which is a birch, but will result in the removal of a further Birch (T2), 4 x Cherry & 1 x Maple (G1) which is a small ornamental group in the garden, and 1 x Sycamore & 1 x Yew (G3) also in the rear garden. Group G2 will be retained as it is located in the neighbouring garden and will not be affected.

All of the trees are in the rear gardens, not directly visible from public areas, and therefore the loss of the trees will not impact unduly on the character of the Conservation Area.

Policy ENV10 relates to Trees and Hedgerows and requires replacement trees to be replanted at a ratio of 2:1. Given that there are 8 trees to be removed including 4 ornamental species, a conditions will be required to ensure a replanting scheme is submitted prior to development commencing. Some replanting could take place within the front garden of 19 Helmsshore Road, which is more visible within the Conservation Area.

In terms of visual amenity, heritage impact and impact on trees, it is considered the proposed development is in accordance with Policies ENV1, ENV2 and ENV10 of the Rossendale Local Plan and is acceptable.

### **Residential Amenity**

Policy ENV1 (c) requires development to be sympathetic to surrounding land uses, avoiding demonstrable harm to the amenities of a local area; and (d) states that the scheme should not have an unacceptable adverse impact on neighbouring development by virtue of it being over-bearing or oppressive, overlooking, or resulting in an unacceptable loss of light;-nor should it be adversely affected by neighbouring uses and vice versa;

The proposed dwelling is C-shaped with the main enclosed amenity area and main windows facing south. The main roof height directly adjacent to Ryefield Place Bungalow which is to the north of the application site is 4.42 metres.

The side elevation of Ryefield Place has three windows; one is an obscurely glazed bathroom window and two high level secondary windows in the living room.

The living room to which the high level windows relate also has a large window that projects from the rear of the property. In assessing against the 45 degree rule, this window will not be unacceptably affected by the proposed development.

In terms of the amenity of future occupiers of the new dwelling itself, the development site is south facing so the windows within the courtyard will have an adequate level of sunlight and daylight.



In view of the above it is considered that the proposals will safeguard the residential amenities currently enjoyed by the occupiers of the neighbouring property and future occupiers of the application property in terms of light and outlook. It is therefore considered that the proposal satisfies the requirements of Policies ENV1, and ENV6 of the Rossendale Local Plan in neighbour amenity terms.

### **Access, Parking and Highway Safety**

Access to the site is via a private passageway from Ryfield Avenue West, which runs parallel to Helmshore Road as a number of private back streets do in the area.

LCC Highways have commented as follows:

*Having reviewed the information submitted, Lancashire County Council acting as the Local Highway Authority does not raise an objection regarding the proposed development and are of the opinion that the proposed development will not have a significant impact on highway safety, capacity or amenity in the immediate vicinity of the site subject to the following comments being noted and conditions being applied to any formal planning approval granted.*

#### *Proposal*

*The proposal is for the erection of 1 bungalow with 2 bedrooms in the existing garden. Access is from Ryefield Avenue, west, via Ryefold Place.*

#### *Car parking*

*Two parking spaces are being provided. An electric charging point should be provided.*

*The electric charge point should be installed in line with the Dept for Transport's guidance regarding Electric Vehicle Charging in Residential and Non-residential Buildings, which states that charge points must have a minimum power rating output of 7kW and be fitted with a universal socket that can charge all types of electric vehicles.*

Several of the adjacent occupiers have commented in relation to the use of the private access way to provide vehicular access to the proposed dwelling, and an adjacent property has indicated that they have access to their garden through the application site.

Land ownership and private access rights are not material planning considerations, providing the correct certificates have been signed, which in this case they appear to have been signed correctly and the relevant notice served on the owners. Such matters would be for the parties involved to resolve privately through the appropriate legal channels.

The Highway Authority have indicated that they *do not raise an objection regarding the proposed development and are of the opinion that the proposed development will not have a significant impact on highway safety, capacity or amenity in the immediate vicinity of the site subject to the following comments being noted and conditions being applied to any formal planning approval granted.*

The proposed development is in accordance with Policy TR4 of the Rossendale Local Plan.

## **Planning Balance**

At the heart of the NPPF and the Local Plan Policy SD1 is a presumption in favour of sustainable development.

Paragraph 11 of the Framework makes clear that for decision taking this means:

- “c) Approve development proposals that accord with an up to date development plan without delay; or*
- d) Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission 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.”*

Currently, the Council can demonstrate a five-year supply of deliverable housing sites. However, the Borough is not in a position to demonstrate that it is achieving the required level of housing delivery.

As such, this triggers paragraph (d) above. The Framework clarifies that policies that are most important to an application are considered out of date where local authorities cannot demonstrate that they are achieving the required level of housing delivery. The weight that is attached to such policies is a matter for the decision maker.

## **Benefits**

The site is not an isolated location as it is an appropriate walking distance from services and facilities in Haslingden Town Centre. However, these matters only attract very limited weight as scheme benefits.

The benefits of one additional home to the local housing stock would be very modest, particularly relative to the Council’s overall housing requirements. Accordingly, only very limited weight can be afforded to this benefit.

## **Harm**

Growth Lancashire have responded that the proposed dwelling will have a negligible impact on the character and appearance of Haslingden Conservation Area and whilst its design does not particularly contribute to the character or appearance of the conservation area, its location and orientation means that it will be largely hidden from view and therefore its visual impact is minor.

There will also be a loss of trees at the site, which will require a replacement scheme to be submitted.

Given that the identified harm is minor and the loss of trees can be suitably mitigated, very limited weight is afforded to the harm in question.

## **Conclusion**

It is not considered that the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits. In this case, it is considered that the planning balance is neutral and that there are no significant adverse impacts which would warrant a refusal of planning permission. Therefore, planning permission should be granted.

### **9. CONCLUSION**

It is considered that the proposal is in accordance with the Rossendale Local Plan and the NPPF.

### **10. CONDITIONS**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

*Reason: To accord with Section 51 of the Planning and Compulsory Purchase Act 2004.*

2. The development shall be carried out in accordance with the following:

Application Form received 19.02.2024 with revised Certificate received 24.04.2024  
Revised Location Plan received 26.06.2024  
Existing Site Plan received 19.02.2024  
Proposed Site Plan received 19.06.2024  
Proposed Plans and Elevations received 19.06.2024  
Planning Statement received 19.02.2024  
Proposed Rainwater Goods received 19.02.2024  
Arboricultural Impact Assessment received 20.09.2024  
Arboricultural Method Statement received 20.09.2024  
Construction Management Statement received 03.10.2024  
Landscaping and Boundary Treatment received 08.10.2024

*Reason: To define the permissions and in the interests of the proper development of the site.*

3. Prior to development commencing samples of all proposed facing and roofing materials, and hard landscaping materials, shall be submitted to and approved in writing by the local planning authority. The approved details shall be implemented in full prior to first occupation of the dwelling.

*Reason: In the interests of visual amenity of the area and ensuring that the appearance of the development is acceptable.*

4. All development shall be carried out in accordance with the approved Construction Management Statement submitted 03.10.2024.

*Reason: To mitigate the impact of the construction traffic on the highway network.*

5. Construction-related deliveries to the approved development shall only be accepted between the hours of 9:30am and 2:30pm Monday – Friday, to avoid peak traffic on the surrounding highway network.

*Reason: In the interest of highway safety.*

6. Prior to first occupation of the approved development an electric vehicle charging point shall be provided in accordance with a scheme to be approved by the Local Planning Authority. Charge points must have a minimum power rating output of 7kW and be fitted with a universal socket that can charge all types of electric vehicle currently available.

*Reason: To ensure that the development provides the infrastructure for sustainable forms of transport.*

7. The parking areas shown on the approved plans shall always remain available for the parking of domestic vehicles associated with the existing dwelling and approved dwelling.

*Reason: In order to ensure satisfactory levels of off-street parking are achieved within the site to prevent parking on the highway to the detriment of highway safety.*

8. The turning area provision included on the approved plan shall always remain so that all vehicles can enter, turn and exit onto Ryefield Avenue West in forward gear.

*Reason: Vehicles reversing to and from the highway are a hazard to other road users*

9. No demolition or tree or shrub clearance shall occur between the 1st March and 31st August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to works and written confirmation provided that no active bird nests are present, which has been agreed in writing by the local planning authority.

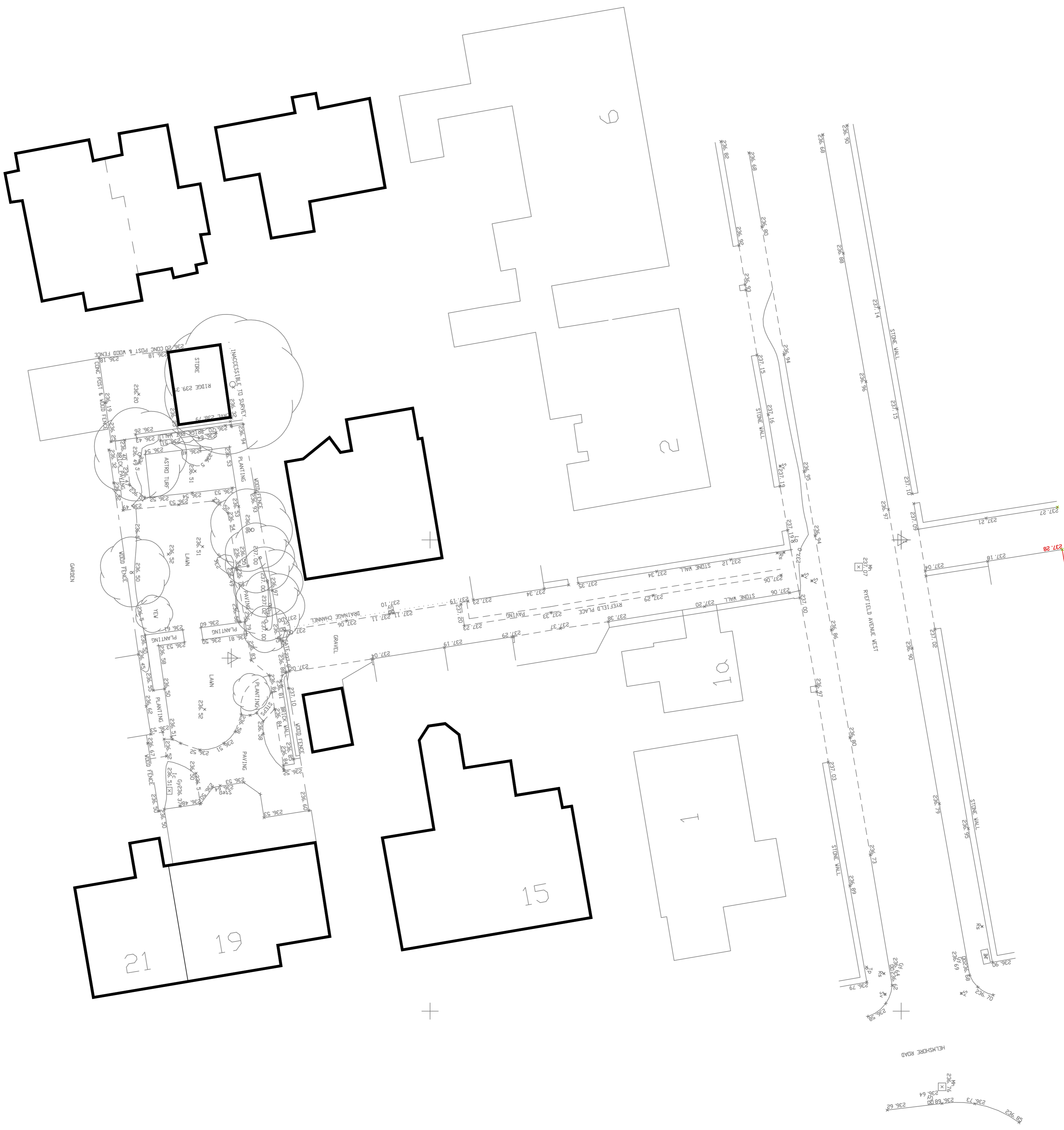
*Reason: In the interests of the ecology and biodiversity of the site*

10. Construction works shall not take place outside the following hours:  
Monday to Friday 08:00 to 18:00  
Saturday 08:00 to 13:00  
Construction works shall not take place on Sundays or Bank or Public Holidays.

*Reason- to ensure that site working only takes place during normal working hours in order to restrict the times during which any disturbance and nuisance may arise.*

## **11. INFORMATIVES**

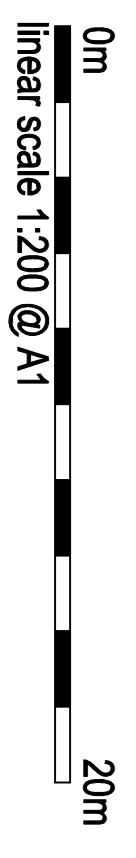
1. The proposal complies with the development plan and would improve the economic, social and environmental conditions of the area. It therefore comprises sustainable development and the Local Planning Authority worked proactively and positively to issue the decision without delay. The Local Planning Authority has therefore implemented the requirement in Paragraph 38 of the National Planning Policy Framework.



**existing site plan**

**proposed 2 bed detached bungalow  
within rear garden area at  
19 Helmsshore Road  
Haslingden**

scale 1:200 @ A1



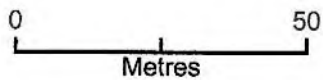
drawing number HR-28-11-23-A

# 19 Helmshore Road



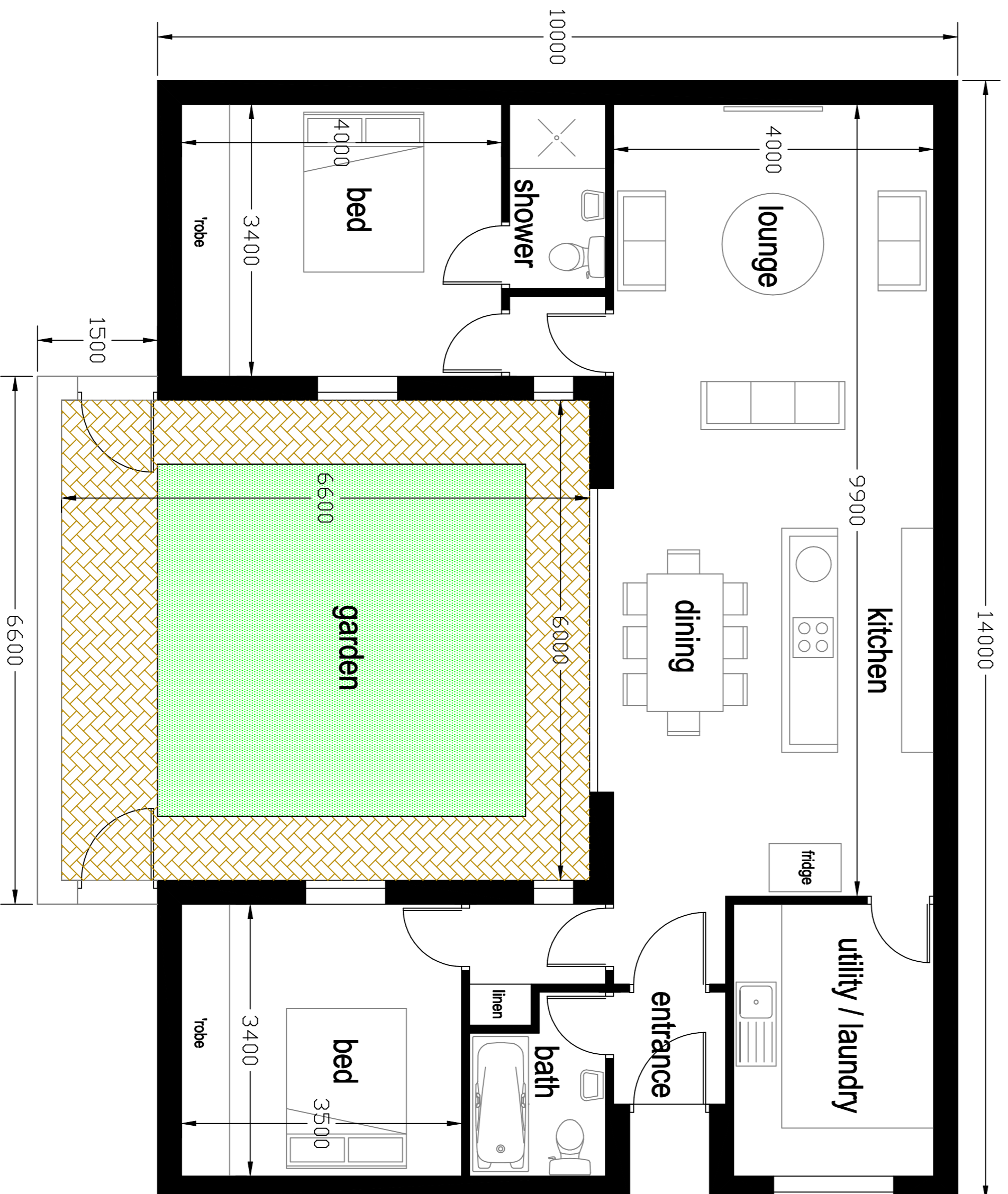
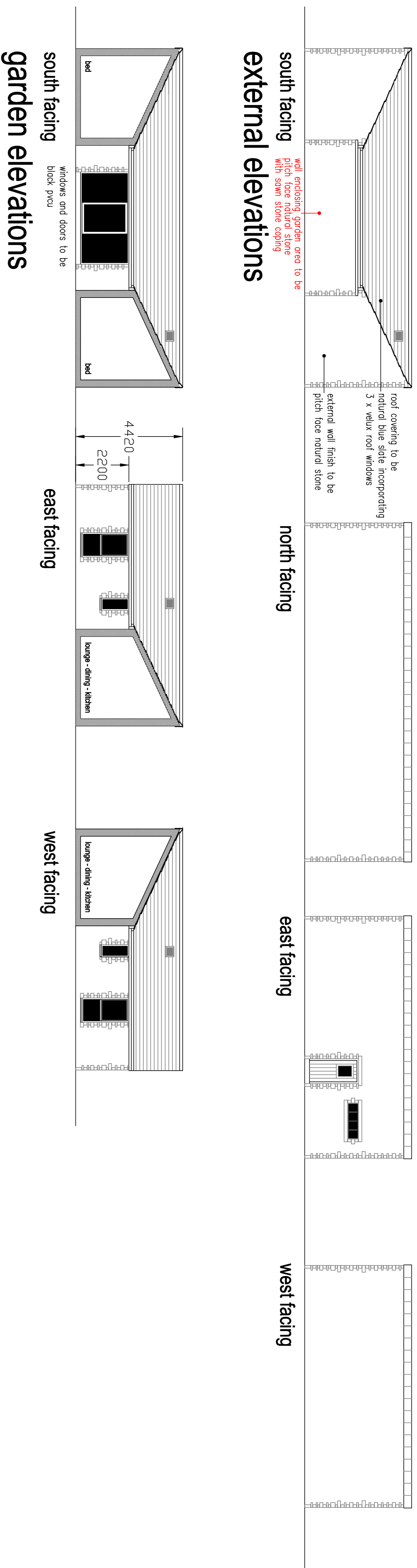
LOCAL PLAN (ATTENDED)

REF: R.H.17024.B.2.



Plan Produced for: 19 Helmshore Road  
Date Produced: 17 Feb 2024  
Plan Reference Number: TQRQM24048175847953  
Scale: 1:1250 @ A4

**external elevations**



**building details**

amended 19-06-24  
staffordshire blue engineering brick  
garden wall changed to pitch face natural stone

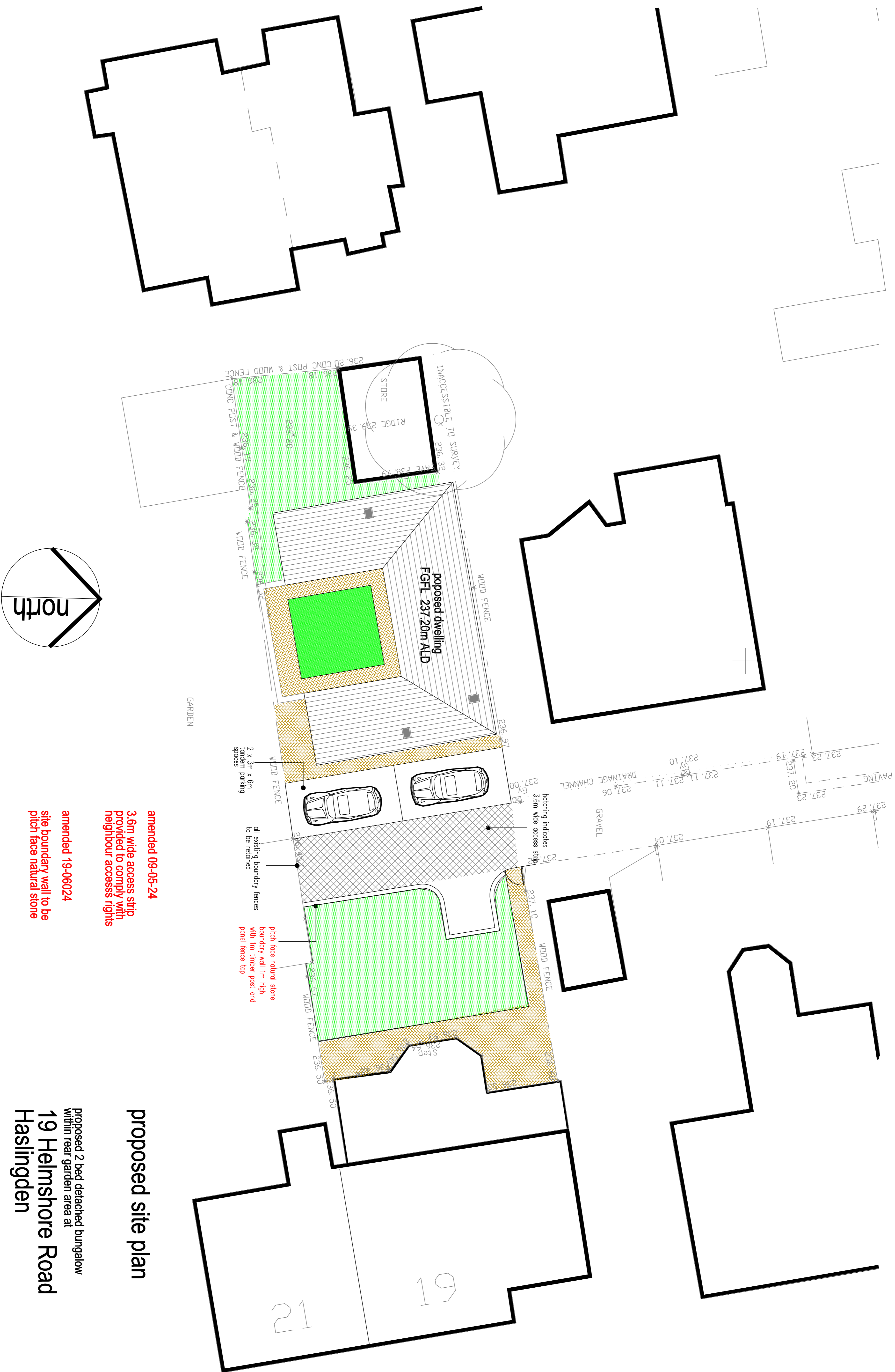
proposed 2 bed detached bungalow  
within rear garden area at  
**19 Helmsshore Road**  
**Haslingden**

scale 1:50 1:100 @ A1

0m 5m

linear scale 1:50 @ A1

drawing number HR-28-11-23-C2

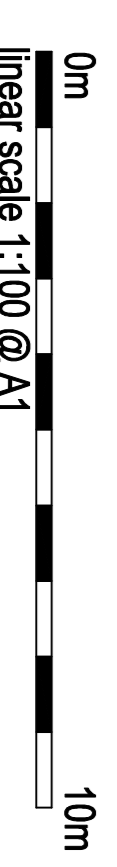


amended 09-05-24  
 3.6m wide access strip  
 provided to comply with  
 neighbour access rights  
 amended 19-06024  
 site boundary wall to be  
 pitch face natural stone

### proposed site plan

proposed 2 bed detached bungalow  
 within rear garden area at  
**19 Helmsshore Road**  
**Haslingden**

scale 1:100 @ A1



drawing number HR-28-11-23-B3









