
Sequential Test Planning Statement

Site is in EA FZ1 but in PUSH SFRA climate change extents

No reasonable alternative allocation sites in lower flood risk

**No change of use required
surface water flood risk at this site
No wave action risk at this site
No fluvial flood risk at this site**

**Scheme results in NPPF compliant flood future-
proofed property**

At:

19 St Peters Avenue, Hayling Island, PO11 0SA

January 2021

Ark Environmental Consultancy Ltd

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If this report has been released electronically, the appendices referred to herein can be found in the annexed zip folder/s as .pdf or .dwg files. If this report has been released in hard copy the appendices will be bound into the back of this report. Plans may be annexed separately as A1 or A0 copies where a bound-in A3 copy is not appropriate.

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1.0 Introduction

This report contains the details of a Sequential Test carried out by ARK Environmental Consulting Limited (“ARK Ltd”) for land to rear of 19 St Peters Avenue, Hayling Island, PO11 0SA, henceforth referred to as “the site” in this report.

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2.0 Scope

This Sequential Test Planning Note has been carried out, where feasible, in accordance with the National Planning Policy Framework (NPPF) and PPG.

It is to be used to assist the Local Planning Authority (LPA) when considering the principle of locating development of this nature at this site, as part of a planning application accompanied also by a site-specific flood risk assessment (Ark, 2021) which concluded the scheme could be constructed and operated safely in flood risk terms without increasing flood risk elsewhere.

Site: Site Location and Status

The site is located on the north side of St Peters Avenue.

See Appendix A.

Permission was granted in 2007 (Application: 07/61610/003) for: “New dwelling to replace bungalow demolished under Planning Permission 97/61610/000”.

A separate Flood Risk Assessment has been provided with the application (Ark, 2021).

The FRA concluded the site is located within EA FZ1 but also in the SFRA future climate change extents hence the NPPF suggests that a Sequential Test should also be required, regardless of the existing FZ1 setting.

The FRA concluded that the scheme would be appropriate in accordance with the NPPF without the need, semantically, to pass the Exception Test as the NPPF does not reference future flood zones verbatim at the relevant section; regardless, the FRA includes the full support for the site and scheme to pass the Exception Test.

The council have requested for similar sites and schemes a site specific sequential test as this development is not an official allocation site included in their most up to date local plan.

Refer to site specific Flood Risk Assessment.

3.0 Development Policy & Consultation

3.1 PUSH Strategic Flood Risk Assessment

The SFRA's promote the guidance and requirements of the NPPF for flood risk.

The SFRA's identify the flood risk posed to and from the potential allocation sites that need to be reviewed as part of the Local Plan.

The SFRA data and mapping clearly indicates:

- This site is within EA Flood Zone 1
- The site is within the future climate change extents
- Sequentially this site is therefore appropriate, as it is not in the current day FZ2 or FZ3

The site and scheme specific FRA&SUDS report has already demonstrated the scheme does not semantically need to pass the NPPF Exception Test.

3.2 Havant Five Year Housing Land Supply Update December 2020

Havant Council currently does not have a full 5 year housing land supply

As per the Havant December 2020 update

- a) the Council is only able to demonstrate 4.8 years supply of housing taking into account accumulated shortfall since 2016/17 and the application of a 5% buffer**
- b) As an important note included in the Dec 2020 update to further substantiate this point specifically for this site
 - *Small site permissions of less than 5 dwellings are included within the five-year supply based on expected delivery and are discounted by 5% to allow for non-implementation. Windfall is excluded from five-year supply calculations to avoid double counting, but is included in the trajectory from the plan period from the year 2025/26 onwards.*

Thus the application for residential development could be deemed to be subject to NPPF paragraph 11 (d):

Part (d) of Paragraph 11 of the NPPF states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, the Council should grant planning permission unless:

- 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;
- 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.

There is nothing in the Local Plan which suggests a replacement residential building would be inappropriate at the site.

3.3 Reasonable Alternative Sites

As a first point, the scheme is NOT in the present day FZ3 or FZ2; this is a significant first reason for the site being by default sequentially preferable to all other sites in present day FZ2 and FZ3, including those allocation sites.

The Sustainability Appraisal of the SHLAA comments have been taken on board in terms of the standard and accepted need for the council to prioritise for wider regeneration purposes some sites that are not necessarily sequentially preferable.

The review of reasonable alternative sites uses ALL the Hayling Island allocations as per the full site review within the SFRA 2018 (Section 2.14) which therefore includes the sequentially preferable sites as per the Strategic Flood Risk Assessment (Local Plan Sites) November 2018 for Hayling from Appendix B (see below).

Reason for choice of “catchment”

The sequential review of alternative sites does not take into consideration the whole of Havant because the scheme is technically a replacement dwelling that does not require a change of use on the site or additional infrastructure (such as for access). Assessing all “one plot” sites in the whole of Havant would not be “reasonable” because they are not going to be an identified allocation site, just as windfall sites are not identified but still included in housing target numbers (whether in number or as part of the trajectory based on past completions).

Given the strange situation of requesting a sequential test for a clear replacement scheme, if one is being pragmatic, the site would be considered a windfall site being for only 1 dwelling or perversely in fact could be seen by the council to not add to the housing stock as the scheme is a replacement dwelling at a “registered” dwelling address, and hence a sequential test would not be required.

Appendix B: FZ1 Sites in Emsworth and on Hayling Island

FZ1 site on Hayling Island		
Reg 18 Policy Ref	Site Name	Area of the Borough
HY1	Land rear of 13-21 Mengham Road	Hayling Island
HY2	Pullingers, Elm Grove	Hayling Island
HY3	Manor Nurseries	Hayling Island
HY4	Land at Sinah Lane	Hayling Island
HY5	Land north of Tournerbury Lane	Hayling Island
HY7	Fathoms Reach	Hayling Island
HY8	Rook Farm (UE77)	Hayling Island
HY9	Land south of Stoke Barn	Hayling Island
HY10	Land rear of Westjay, 107 Havant Road	Hayling Island
HY11	Land at Hayling Island College (Sports Field)	Hayling Island
HY49	41 Station Road (HY29)	Hayling Island
Commentary		
Hayling Island has only one access on and off the island, and the access itself is at risk of flooding. Although the above sites have no site specific tidal or fluvial flood risk issues, consideration of what would happen in the case of an emergency is therefore important.		
The Council has developed an Emergency Response Plan and Hayling Island Emergency Planning Framework, available at http://www.havant.gov.uk/emergency-advice/councils-role-in-an-emergency . The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately.		

Review of Allocation Sites

Hayling Island is used as the catchment given the scheme is a replacement dwelling / single dwelling plot and the council have a confirmed under supply which means the main land allocations or other plots are not relevant to this assessment.

HAY	HY1	Land rear of 13-21 Mengham Road	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes
HAY	HY10	Land rear of Westjay, 107 Havant Road	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes
HAY	HY11	Land at Hayling Island College (Sports Field)	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes

Comment from August 2020 SHLAA & Flood Comment

Permission already granted. Site is not available. Not a suitable alternative. SHLAA comment: *“Some potential for permission to lapse. Not considered deliverable at this time”*

SHLAA notes considerable environmental constraints and size is not comparable. Not a suitable alternative.

Loss of sports pitches and recreational facility; size is not comparable. Also in part high surface water risk. Not a suitable alternative. Not in lower flood risk overall than subject site.

Area of HBC	Site ref	Site Name	Proposed Dev Type	Sequential Test Commentary	Sequ. Test Passed	Exception Test Commentary	Possible to pass Exc. Test	Prospect of Safe Delivery Commentary and Conclusion for SA of HBLP2036	Acceptable for HBLP2036 allocation
HAY	HY16	The Nab Car Park, Southwood Road	Key Sites	Significant proportion of the site area is in FZ2&3, including the access road. With climate change, almost the entirety of the site will be in FZ 2&3 in the future.	No	It is considered that the proposed development will provide wider sustainability benefits to the community that outweigh flood risk. Further detailed work will need to establish how the site can be developed safely.	Yes	While there may be sequentially preferable sites for development, the purpose of this allocation is to provide regeneration and new facilities for the Hayling Seafrost. This cannot take place anywhere but Hayling Seafrost, all of which is at risk of flooding. A combination of off-site strategic, on-site and adjacent off-site measures could make the development safe. Any residual risk will need to be properly assessed and appropriate mitigation measures identified. The policy for the site will have to highlight the flood risk and require mitigation measures to be put in place.	Yes
HAY	HY17	Beachlands	Key Sites	The site currently lies in FZ1, but with climate change, significant parts are shown to be at risk in the future. The access road also lies in FZs 2&3 in the future.	No	It is considered that the proposed development will provide wider sustainability benefits to the community that outweigh flood risk. Further detailed work will need to establish how the site can be developed safely.	Yes	While there may be sequentially preferable sites for development, the purpose of this allocation is to provide regeneration and new facilities for the Hayling Seafrost. This cannot take place anywhere but Hayling Seafrost, all of which is at risk of flooding. A combination of off-site strategic, on-site and adjacent off-site measures could make the development safe. Any residual risk will need to be properly assessed and appropriate mitigation measures identified. The policy for the site will have to highlight the flood risk and require mitigation measures to be put in place.	Yes
HAY	HY18	Eastoke Corner	Key Sites	Significant proportion of the site area is in FZ2, including the access road to the west, and the road running through the site. The road running norther is unaffected in the current day, but becomes vulnerable in the climate change scenario. The area of the undeveloped green on the corner of Rails Lane and the Seafrost is in FZ1, and remains largely unaffected by the climate change scenario.	No	It is considered that the proposed development will provide wider sustainability benefits to the community that outweigh flood risk. Further detailed work will need to establish how the site can be developed safely.	tbc	While there may be sequentially preferable sites for development, the purpose of this allocation is to provide regeneration and new facilities for the Hayling Seafrost. This cannot take place anywhere but Hayling Seafrost, all of which is at risk of flooding. A combination of off-site strategic, on-site and adjacent off-site measures could make the development safe. Any residual risk will need to be properly assessed and appropriate mitigation measures identified. The policy for the site will have to highlight the flood risk and require mitigation measures to be put in place.	Yes

Not in lower flood risk. Site is in current FZ2 & FZ3. SHLAA states: “Substantial flooding issues both now and in the future, regeneration potential”. Not a suitable alternative.

SHLAA notes considerable environmental constraints and size is not comparable. Also in higher surface water risk area. Not a suitable alternative.

Not in lower flood risk. Site is in part current FZ2 hence higher future risk. Not a suitable alternative.

Area of HBC	Site ref	Site Name	Proposed Dev Type	Sequential Test Commentary	Sequ. Test Passed	Exception Test Commentary	Possible to pass Exc. Test	Prospect of Safe Delivery Commentary and Conclusion for SA of HBLP2036	Acceptable for HBLP2036 allocation
HAY	HY19	West Beach	Key Sites	The site currently lies in FZ1, but with climate change, most of the site and the access road lie in FZs 2&3 in the future.	No	It is considered that the proposed development will provide wider sustainability benefits to the community that outweigh flood risk. Further detailed work will need to establish how the site can be developed safely.	Yes	While there may be sequentially preferable sites for development, the purpose of this allocation is to provide regeneration and new facilities for the Hayling Seafront. This cannot take place anywhere but Hayling Seafront, all of which is at risk of flooding. A combination of off-site strategic, on-site and adjacent off-site measures could make the development safe. Any residual risk will need to be properly assessed and appropriate mitigation measures identified. The policy for the site will have to highlight the flood risk and require mitigation measures to be put in place.	Yes
HAY	HY2	Pullingers, Elm Grove	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes
HAY	HY3	Manor Nurseries	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes
HAY	HY4	Land at Sinah Lane	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes

Not comparable site as not for residential.

SHLAA notes access constraints and size is not comparable. Also in higher surface water risk area. Not a suitable alternative.

SHLAA notes Radon Class 2 and noise constraints and size is not comparable. Also in part higher surface water risk area. Not a suitable alternative.

Planning application submitted. Size is not comparable. SHLAA also notes ecological constraints and adjacent to SSSI. Not a suitable alternative.

Area of HBC	Site ref	Site Name	Proposed Dev Type	Sequential Test Commentary	Sequ. Test Passed	Exception Test Commentary	Possible to pass Exc. Test	Prospect of Safe Delivery Commentary and Conclusion for SA of HBLP2036	Acceptable for HBLP2036 allocation
HAY	HY5	Land north of Tournerbury Lane	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes
HAY	HY6	Northney Marina	Housing	Small area on edge of site in tidal FZ2&3 (increases with climate change), but access road substantially affected by FZ2&3.	No	Detailed FRA work has demonstrated that proposed buildings will remain safe and not subject to flooding. Flooding on access is considered to be predictable with several days advance notice, so can be managed by means of a robust flood risk management plan.	Yes	Detailed FRA work has demonstrated that proposed buildings can remain safe and not subject to flooding, by siting proposed residential development on the highest ground within the site, and raising the level of the commercial area. Flooding on access is considered to be predictable with several days advance notice, so can be managed by means of a robust flood risk management plan. Policy would have to require that this is prepared as part of application.	Yes
HAY	HY7	Fathoms Reach	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes
HAY	HY8	Rook Farm	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes

SHLAA states: "land no longer available for development". Not an available or alternative site.

SHLAA states: "Access in Flood Zone 3 for SFRA. Whole site within AONB." Not a suitable alternative.

SHLAA notes considerable environmental constraints and size is not comparable. Also in higher surface water risk area. Not a suitable alternative.

SHLAA notes considerable environmental constraints and size is not comparable. Also in part higher surface water risk area. Not a suitable alternative.

Area of HBC	Site ref	Site Name	Proposed Dev Type	Sequential Test Commentary	Sequ. Test Passed	Exception Test Commentary	Possible to pass Exc. Test	Prospect of Safe Delivery Commentary and Conclusion for SA of HBLP2036	Acceptable for HBLP2036 allocation
HAY	HY9	Land south of Stoke Barn	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes
HAY	HY46	Land north of Selsmore Road	Housing	Currently, a very small part in the south eastern corner of the site is affected by Flood Zones 2 and 3. The area at risk of flooding increases notably with climate change, covering the likely access point off Selsmore Road and a large part of the site.	No	Flood Risk on site could be avoided. This would require a much reduced area / housing yield. No information available to demonstrate that a safe access could be delivered, particularly in the climate change scenario.	No	While a much reduced development could be brought forward on land not at risk of flooding, it has not been demonstrated that safe access could be delivered. While risk on the site could be avoided by reducing substantially the developable area and therefore the number of homes, it has not been demonstrated that safe access is achievable. Together, these call into question the desirability of an allocation on this greenfield site.	No
HAY	HY49	41 Station Road	Housing	In FZ1 - Sequentially Preferable site - no site specific fluvial or tidal issues.	Yes	not needed - sequential test passed	not required	While the site itself is in FZ1, it is noted that access on and off Hayling Island is at risk. The Council have developed and Emergency Response Plan and Hayling Island Emergency Planning Framework. The council is satisfied that with these plans in place, the risks associated with having just one access from on to the Island can be managed appropriately	Yes
HAY	BD77	Northney Marina	Commercial	Small area on edge of site in tidal FZ2&3 (increases with climate change), but access road substantially affected by FZ2&3.	No	proposed use classed as mixture of 'water compatible' and 'less vulnerable'. Exception test not required. Nevertheless, floor levels may be raised to lift buildings out of flood risk.	not required	Detailed FRA work has demonstrated that proposed buildings can remain safe and not subject to flooding, by siting proposed residential development on the highest ground within the site, and raising the level of the commercial area. Flooding on access is considered to be predictable with several days advance notice, so can be managed by means of a robust flood risk management plan. Policy would have to require that this is prepared as part of application.	Yes

SHLAA notes considerable environmental constraints and size is not comparable. Also in part higher surface water risk area. Not a suitable alternative.

Not in lower flood risk. Site is in part current FZ2 & FZ3 hence higher future risk. Not a suitable alternative.

Is this being confused with HY15? Regardless: SHLAA states HY15 "41 Station Road" is already under construction and HY49 "Sandy Point Tennis Club" is no longer available. Neither allocations are available.

Not in lower flood risk. Site has significant present day flood risk and higher future risk. Not a suitable alternative.

Sequential Assessment and Summary: Supporting Evidence for the Council

The LPA are the responsible body for approving the sequential test.

Sequential Assessment

It is acknowledged that there are lots of considerations that need to be addressed in undertaking a housing allocations assessment, but it is a fact that the other considerations mean that the council are going against the sequential test, using other requirements to override the overall NPPF requirement that all new dwellings should be in FZ1, again, unless otherwise justified.

We fully appreciate that this happens in Local Plans across England for many sites.

What is unequivocal is that the subject site has the following reasons for being sequentially acceptable:

- It is in Environment Agency present day FZ1 and has immediate access/ egress within and to FZ1
- It is therefore NOT in present day FZ2 or FZ3
- The site is indeed in the future climate change extents but crucially it will not be in the worse case given
 - it will not be in a breach extent
 - it will not be subject to wave action (critical) and
 - it will not be in a rapid inundation zone given the setting.
- There are no suitable alternative sites in lower flood risk within the catchment based on a review of the allocation sites
- Many of the allocation sites indeed do have a higher fluvial / tidal flood risk and / or are at greater risk from other sources of flooding which the subject site is not: this is a material consideration at planning which means the subject site is sequentially preferable i.e. some of the allocation sites are in higher surface water risk whereas the site is in NO – VERY LOW hazard. This is unequivocal.

The benefits of the scheme in question:

- Using a brownfield site (previous permission for a replacement dwelling)
- No change of use is required
- Providing a more modern and fully flood resilient and flood future-proofed dwelling than existing adjacent dwellings
- Reducing flood risk overall in the future by incorporating SUDS
- Reduction in flood risk is a key aspiration of the NPPF
- This is a tangible and genuine betterment and is required by the NPPF

Summary

The council cannot meet its housing numbers in lower flood risk zones, and hence this site and scheme is appropriate sequentially.

It has been demonstrated also to not need to pass the Exception Test.

The Kingston allocation sites even partly in FZ3 will all need to pass the Exception Test (and they may not be able to (see Section 3.4) thus the subject site has been carefully chosen to not require the Exception Test.

3.4 FRA & NPPF Exception Test: included only for support

The scheme in fact does not need to pass the Exception Test because it is a “More Vulnerable” scheme in FZ1; the NPPF states that no Exception test is required but technically, but this is not the wording in the NPPF, the site is also within the climate change extents which places it in a future FZ2 / FZ3; this is not something that the NPPF states at the section on Exception Tests.

Regardless, the FRA and this sequential assessment considers that the Exception Test can be passed.

The Exception Test is of two parts; the first part relates to demonstrating suitable wider sustainability credentials of a scheme. In flood risk terms, the FRA demonstrates quantitatively that the scheme can reduce flood risk overall. Other technical, design and planning reports accompanying the application further demonstrate the wider sustainability credentials of the scheme.

The site and scheme specific FRA which accompanies this application is in itself the second part of the Exception Test, demonstrating the scheme can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere.

Critical: The scheme can reduce flood risk to the housing stock in the area:

- Establish a modern flood resilient building
- Flood future-proofed housing stock for the lifetime required for residential including for the new climate change allowances
- The scheme will result in modern integrated flood designs
- The scheme will not increase flooding elsewhere
 - In fact: the scheme reduces flood risk overall

4.0 Conclusion

The scheme and site are considered appropriate in principle in flood risk terms (see full FRA also) and it is considered that based on the design responses, the scheme can pass the NPPF / PPG Exception Test.

The need for a sequential test is partly semantic, given the site is an existing dwelling site which had planning approval for demolition of the previous dwelling and planning approval for erection of a new dwelling.

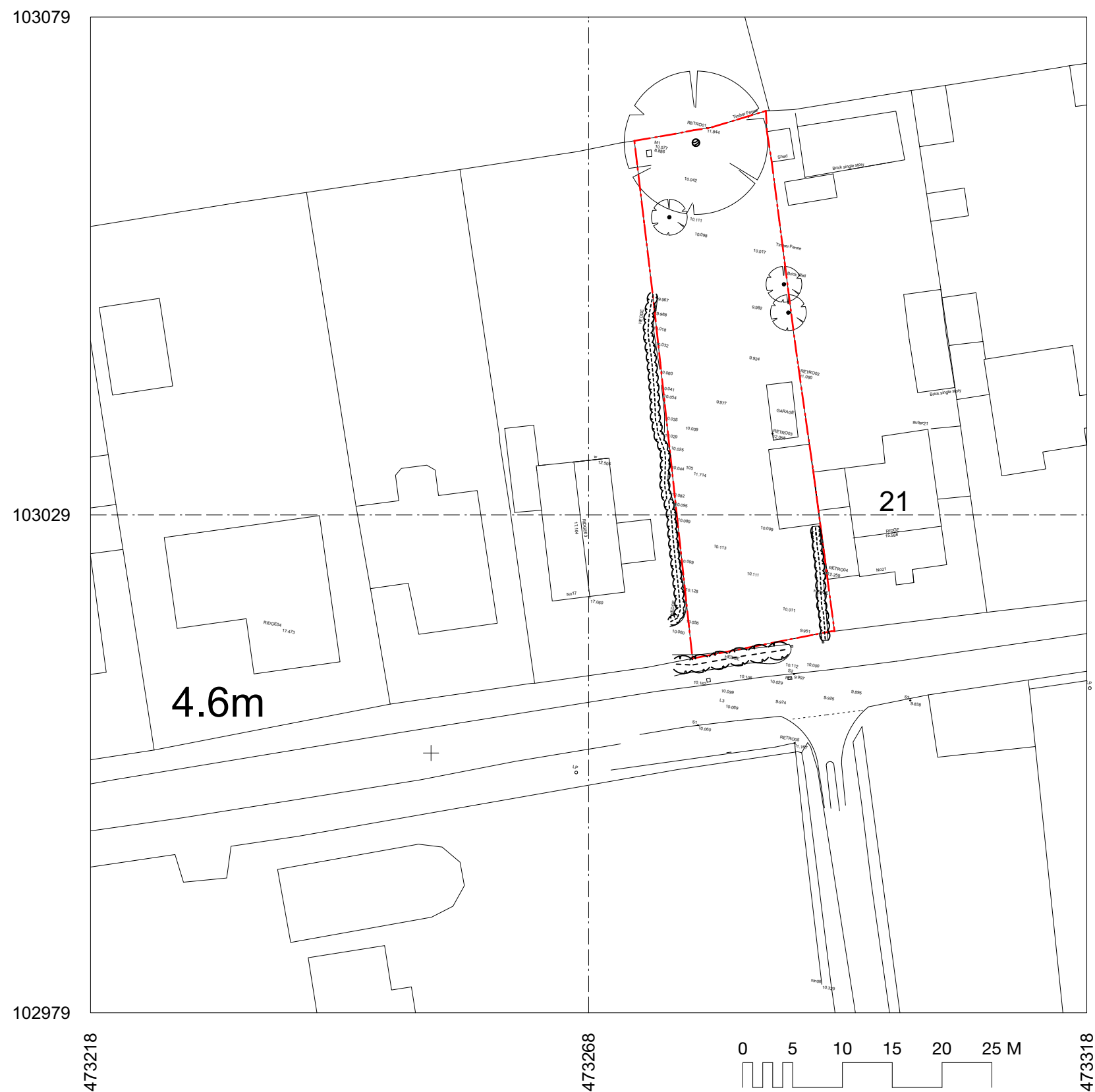
It is considered that the scheme could still pass the Sequential Test based on the lack of allocation sites in lower flood risk, lack of comparable sites in the area, unequivocal need for housing and the wider sustainability credentials of the scheme.

This is supported by the PUSH and Havant SFRA's.

The site can be greatly improved in flood risk terms and reduce flood risk in the area.

The separate site specific FRA concludes that based on the likely flooding risk, it is considered that the proposed development can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere and is therefore appropriate development in accordance with the NPPF / PPG.

Appendix A



Block Plan
scale 1:500



Location Plan

scale 1:1250

REV.:	DATE:	DRWN.:	DESCRIPTION:		INIT.
FIGURED DIMENSIONS ONLY TO BE USED © FAITHFULL ARCHITECTS					
· FAITHFULL ARCHITECTS ·					
+44 (0)20 7228 0888					
PROJECT: 19 St. Peter's Avenue, Hayling Is.					
CLIENT: Sam Upton					
DRAWING: Location & Block Plans.					
SCALE: 1:100@A3			DRAWN BY:		
DATE: July 2020			DRAWING NO. 1018/01	REV.	