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Our Ref: K2483
AWC Ref: AWDM/0626/25
Date: 26th January 2026

Issued by email only

Dear Gary Peck (Adur & Worthing Councils),

Re: Response to WSP's Comments to Planning Submission AWDM/0626/25 (Condition 7, 9 & 10) on Ropetackle Development in Shoreham-by-Sea.

Following receipt of WSP's letter response to submission of details in relation to Conditions 7 (CMP), 9 (Surface Water) & 10 (Drainage) for AWDM/2294/21 (dated 6th January 2026), BWP have been instructed by Trinity Homes Ltd. to produce this letter to address the comments raised by WSP, who act as the Lead Local Flood Authority on behalf of Adur & Worthing Councils.

WSP's Comments (in Appendix A):

Following a review of the updated information, we note that the applicant has submitted an updated drainage strategy that provides groundwater monitoring recorded across February and March 2025. This has demonstrated that shallow infiltration is possible. It is noted that monitoring could be completed in the east of the site, which is located in Flood Zone 1, for potentially favourable results. Therefore, the applicant has not followed the hierarchy of preference and has not met the wording of Condition 9. With regards to Condition 10, information regarding maintenance and management has been provided, however, we would recommend this condition is not discharged until the principles in Condition 9 have been agreed, in case a change in drainage strategy is required.

We note that we have already recommended the discharge of Condition 7. However, ***we would recommend Condition 9 and Condition 10 are not approved until updated information is received that addresses the above points.***

BWP's Responses:

It is noted that surface water discharge via shallow infiltration may be possible on site, however due to site constraints, outlined below, the inclusion of such discharge methodology is not possible.

As shown on the EA's flood zoning map (in Appendix B), the site consists of predominantly Flood Zone 1, with the western area of site being Flood Zone 3. The majority of site has likely been classified as Flood Zone 1, due to it being at a higher elevation in comparison to the western area and boundary with Old Shoreham Road (A283). The level differences are shown by the contours on drawing no. 25101-ON-XX-XX-DR-X-222-C01 by OnyxGeo Consulting Ltd (in Appendix C).

Although the eastern area of site, classified as Flood Zone 1, could be suitable for shallow infiltration, the ground level is a minimum of 3.0 metres higher than the lowest point on site (+3.00m AOD) along the

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western boundary. Therefore, any form of infiltration would require excavation on a minimum of 4.0 metres or a pumped solution, which were deemed to be expensive and impractical for such a small development.

A review into the possibility of a suitable area for shallow infiltration in the western/lower area of site, between Old Shoreham Road and the proposed new-builds, was undertaken in the early stages of the development and it was determined that such a method of surface water discharge would be severely affected by the easement requirements for; the existing carriageway (Old Shoreham Road), the foundations of the new build properties and the existing Network Rail railway line to the south of site, all of which would require a 10 metres minimum easement to mitigate any likelihood of ground failures related to infiltration.

I trust that the information outlined above answers the comments and queries raised in WSP's letter, received via AWC and Trinity Homes Ltd. on the 14th January 2026, however, if you have any further comments or queries, please do not hesitate to contact us directly to discuss them.

Yours sincerely
For and behalf of BWP

[redacted]

Andrew Peeke GMICE
Design Civil Engineer

BWP is the trading name of
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APPENDIX A – WSP Comments on AWDM/0626/25 – Dated: 6th January 2026

Gary Peck
Adur & Worthing Councils
Portland House,
Richmond Road,
Worthing,
BN11 1LF

6 January 2026

Dear Gary,

RE: **AWDM/0626/25 - Development Site At 12 To 18 Old Shoreham Road Shoreham-by-sea West Sussex.**

Thank you for your consultation on the above site. We have reviewed the application as the drainage consultant acting on behalf of the Council and wish to make the following comments.

The applicant is applying for the approval of details reserved by Conditions 4 (Remediation Strategy), Condition 7 (CMP), Condition 9 (Surface Water) and Condition 10 (Drainage) of approved application AWDM/0092/25. The application is to Adur District Council.

Following a review of the updated information, we note that the applicant has submitted an updated drainage strategy that provides groundwater monitoring recorded across February and March 2025. This has demonstrated that shallow infiltration is possible. It is noted that monitoring could be completed in the east of the site, which is located in Flood Zone 1, for potentially favourable results. Therefore, the applicant has not followed the hierarchy of preference and has not met the wording of Condition 9. With regards to Condition 10, information regarding maintenance and management has been provided, however, we would recommend this condition is not discharged until the principles in Condition 9 have been agreed, in case a change in drainage strategy is required.

We note that we have already recommended the discharge of Condition 7. However, **we would recommend Condition 9 and Condition 10 are not approved until updated information is received that addresses the above points**.

Reason
To prevent flooding in accordance with National Planning Policy Framework paragraphs 165-175 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage, and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

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Yours sincerely,

Sustainable Water Management Officer

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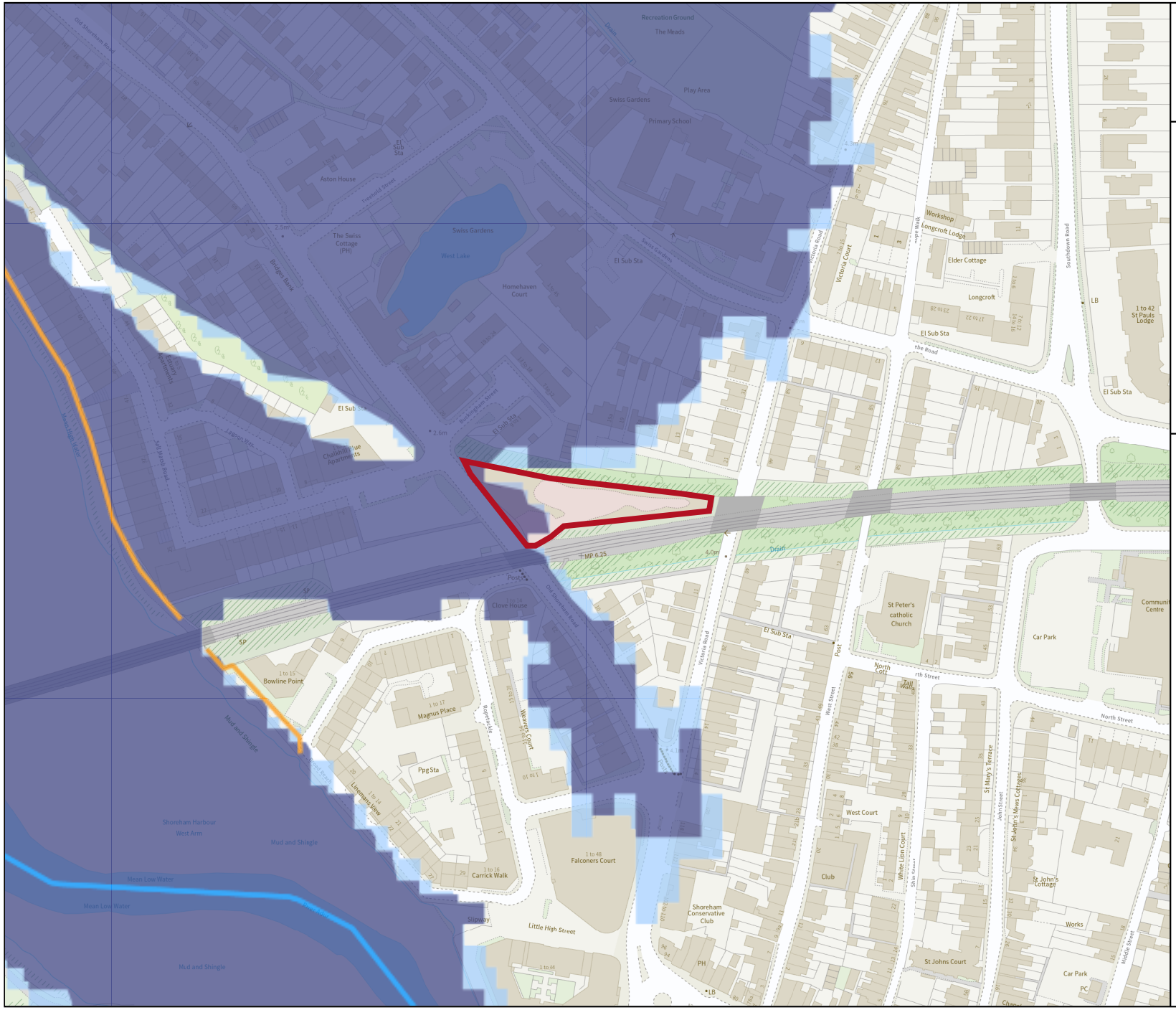
APPENDIX B – Environment Agency Flood Zoning Map



Environment Agency

Flood map for planning

Your reference
<Unspecified>

Location (easting/northing)
521282/105308

Scale
1:2500

Created
20 Mar 2025 14:54

- Selected area
- Flood zone 3
- Flood zone 2
- Flood zone 1
- Flood defence
- Main river
- Water storage area

0 20 40 60m

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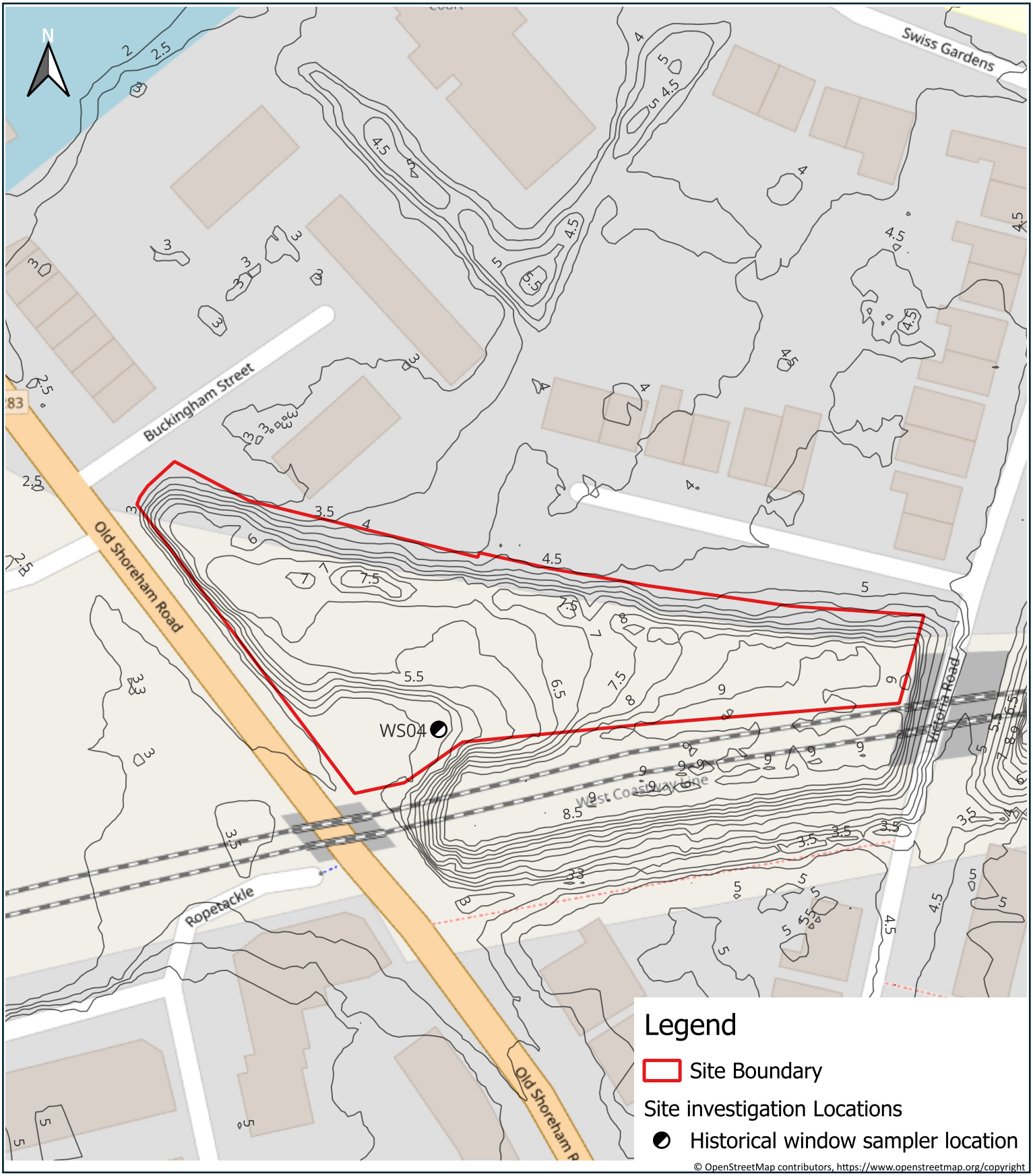
APPENDIX C – Drawing no. 25101-ON-XX-XX-DR-X-222-C01 by OnyxGeo Consulting Ltd



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Project Name: Ropetackle Groundwater Monitoring			
Client: Trinity Homes (UK) Ltd			
Drawing Number: 251010-ON-XX-XX-DR-X-222-C01			
Description: Figure 2 Monitoring well location			
Project No: ON251010	Rev: C01	Date: 27/03/2025	Scale @A4: 1:800
Drawn: MW	Checked: SC	Approved: MW	0 10 20 m Do not scale drawing

ONYXGEO CONSULTING LTD.
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