



Blenheim Estates

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**37 - 41 BRIGHTON ROAD,  
SHOREHAM-BY-SEA**

Waste Management Strategy



## **Blenheim Estates**

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# **37 - 41 BRIGHTON ROAD, SHOREHAM-BY-SEA**

## **Waste Management Strategy**

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# 1. INTRODUCTION

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## 1.1. BACKGROUND

1.1.1. This Waste Management Strategy has been prepared by WSP on behalf of Blenheim Estates ('the Applicant'), in support of an application for outline planning permission for the redevelopment of 37 - 41 Brighton Road ('the Proposed Development'), within the administrative boundary of Adur District Council (ADC).

1.1.2. The description of development is as follows:

*"The proposed development consists of 49 apartments, 57.6sqm commercial use, 22 car park spaces".*

## 1.2. REPORT STRUCTURE

1.2.1. This report is set out in the following format:

- **Chapter 1: Introduction**
- **Chapter 2: Waste Legislation, Policy and Guidance** - details of the legislation and national and local waste policies that have relevance to waste management at the Proposed Development.
- **Chapter 3: Management of Residential Waste** - provides an estimate of waste storage requirements and outlines the plan which will be adopted to manage the residential waste once operational.
- **Chapter 4: Management of Commercial Waste** - provides an estimate of waste storage requirements and outlines the plan which will be adopted to manage the commercial waste once operational.
- **Chapter 5: Summary & Conclusions**
- **Appendix A: National and Local Waste Policy & Guidance**
- **Appendix B: Ground Floor Plan**

## 2. WASTE LEGISLATION, POLICY AND GUIDANCE

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### 2.1. INTRODUCTION

- 2.1.1. The development and implementation of European Union (EU) waste policy and legislation is delivered by EU Directives, such as the Landfill Directive, Waste Electrical and Electronic Equipment Directive etc. Member States must implement the policy drivers and requirements of these Directives through national legislation.
- 2.1.2. The revised Waste Framework Directive (rWFD) is a unique EU Directive because it clarifies the definition of 'waste' and of other concepts such as 'recycling' and 'recovery'. It implements a revised Waste Hierarchy, expands the 'polluter pays' principle by emphasising producer responsibility and applies more stringent waste reduction and management targets for Member States. It also requires Member States to take measures to promote high quality recycling and to set up separate collections of paper, plastic, metal and glass.
- 2.1.3. The UK formally left the EU on 31 January 2020 and the subsequent transition period ended on 31 December 2020. During that time, the UK was treated for most purposes as if it was still an EU Member State, and most EU law (including as amended or supplemented) continued to apply to the UK. As of 1 January 2021, legislation has remained in force as part of UK law and will be repealed or amended at the will of Parliament or the devolved parliaments / assembly.
- 2.1.4. This section summarises the national legislation that is relevant to the Proposed Development, much of which is influenced by the rWFD. National and local waste policy and guidance reviewed during the preparation of this Strategy are also listed below.

### 2.2. NATIONAL LEGISLATION

- 2.2.1. A list of relevant items of national waste legislation is provided below in reverse chronological order:
- **Environment Act 2021** – The Act contains several provisions in relation to waste which will affect both collection and disposal authorities. It establishes the Office for Environmental Protection, tighter regulations for shipments of hazardous wastes, introduces the deposit return scheme for drinks containers, charges for single use plastics, greater consistency for recycling collections in England and Extended Producer Responsibility for packaging.
  - **Waste Management, The Duty of Care Code of Practice (2018 update)** - This code of practice replaces the 1996 Code and is pursuant to Section 34(9) of the Environmental Protection Act 1990. It sets out practical guidance on how to meet waste duty of care requirements and is admissible as evidence in legal proceedings i.e. its rules will be taken into account where relevant in any case based on breach of the duty of care.
  - **The Waste (England and Wales) Regulations 2011 (as amended)** - As of January 2015, waste collection authorities must collect waste paper, metal, plastic and glass separately. It also imposes a duty on waste collection authorities, from the date, when making arrangements for the collection of such waste, to ensure that those arrangements are by way of separate collection.
  - **Environmental Protection Act 1990** - Part II of the Act was originally implemented by the Duty of Care Regulations 1991. The Duty of Care is a legal requirement for those dealing with certain kinds of waste to take all reasonable steps to keep it safe and is set out in Section 34 of the Act.

The Waste (England and Wales) Regulations 2011 repealed the Environmental Protection (Duty of Care) Regulations 1991 and apply the Duty of Care requirements by the Environmental Protection Act 1990.

## **2.3. NATIONAL AND LOCAL WASTE POLICY**

2.3.1. The relevant national and local waste policies that were reviewed during the preparation of this Strategy are outlined below and further detail provided in **Appendix A**:

- Ministry of Housing, Communities and Local Government (MHCLG), now the Department for Levelling Up, Housing and Communities, National Planning Policy Framework (updated December 2024);
- MHCLG, National Planning Policy for Waste (2014);
- Department for Environment, Food and Rural Affairs (Defra), Our waste, our resources: a strategy for England (2018);
- Defra, Waste Management Plan for England (2021);
- Adur District Council (ADC), Adur Local Plan (2017);
- ADC, Shoreham Harbour Regeneration, Shoreham Harbour Joint Area Action Plan (2019); and
- Adur & Worthing Councils Household Waste and Recycling Collection Policy (2021).

### 3. MANAGEMENT OF RESIDENTIAL WASTE

#### 3.1. INTRODUCTION

3.1.1. This chapter outlines the strategy that will be adopted to manage the waste arisings from the residential dwellings within the Proposed Development once operational.

#### 3.2. WASTE GENERATION MODEL

3.2.1. Estimated residential waste generation from the Proposed Development has been quantified based on weekly waste generation metrics sourced from BS5906:2005 *Waste management in buildings – Code of Practice* (hereafter referred to as BS5906:2005). The waste generation metrics are summarised below:

- *Number of dwellings x (volume arising per bedroom [70 litres] x average number of bedrooms) + 30 litres.*
- *Assumes 45% refuse, 45% recycling and 10% food waste.*
- *Assumes fortnightly collections for refuse and recycling.*
- *Assumes weekly collection for food waste*

3.2.2. **Table 3-1** below provides a summary of the Proposed Development’s residential accommodation schedule.

**Table 3-1 – Accommodation Schedule**

Description	Unit Type	Number of Dwellings
Residential Units	1 bed	14
	2 bed	30
	3 bed	5
<b>Total</b>		<b>49</b>

3.2.3. **Table 3-2** outlines the estimated waste arisings from the residential units based on the metrics shown above and the accommodation schedule in **Table 3-1**.

**Table 3-2 – Estimated Residential Waste Arisings**

Description	Total Waste (Litres)	Refuse (Litres)	Recycling (Litres)*	Food Waste (Litres)
Residential Units	15,400*	6,930	6,930	1,540
* Calculated using the weekly waste generation metric detailed above, and then multiplying by two.				

### 3.3. PROPOSED RESIDENTIAL WASTE STRATEGY

#### INDIVIDUAL RESIDENTIAL UNITS

- 3.3.1. Each residential property will be provided with a segregated waste bin, which will be fixed into an appropriate kitchen unit.
- 3.3.2. An example of a suitable segregated waste bins is shown in **Figure 3-1**.

**Figure 3-1 - Example Segregated Waste Bin**



- 3.3.3. The residents will be responsible for cleaning these bins, and for regularly transporting their refuse, recycling and food waste from their property to the waste store at ground floor level.
- 3.3.4. It is proposed that a waste store for residential units will be provided at ground floor level, which will be large enough to accommodate all refuse, recycling and food waste by residents.
- 3.3.5. Based on the estimated volumes of waste arising from the residential units outlined in **Table 3-2**, **Table 3-3** details the number and types of bins that will be provided within the waste store.

**Table 3-3 – Residential Bin Number Requirements**

Description	Refuse - 1,100 Litre Eurobins (No.)	Recycling - 1,100 Litre Eurobins (No.)	Food Waste - 240 Litre Bins (No.)*
Residential Units	7	7	4

*\* Total food waste divided by two to establish bin numbers for weekly collection frequency.*

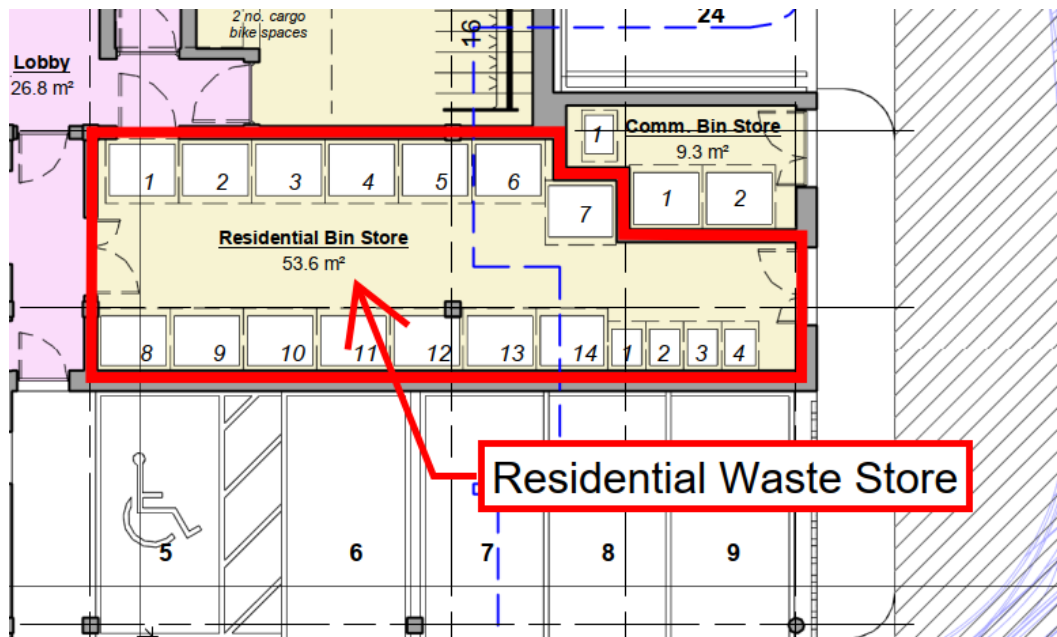
- 3.3.6. The bin dimensions are provided in **Table 3-4**.

**Table 3-4 – Bin Dimensions**

Bin Type	Height (mm)	Width (mm)	Depth (mm)
1,100 litre Eurobin	1,380	1,270	1,000
240 litre Bin	1,100	585	740

- 3.3.7. The waste store provided within the co-living block will have sufficient space to accommodate the number of bins shown in **Table 3-3**.
- 3.3.8. Residents will be required to transfer their waste from their individual dwellings directly to the waste store where they will segregate their waste into the appropriately labelled bins.
- 3.3.9. The location of the proposed residential waste store at ground floor level is shown in **Figure 3-2**.

**Figure 3-2 - Location of Residential Waste Store**



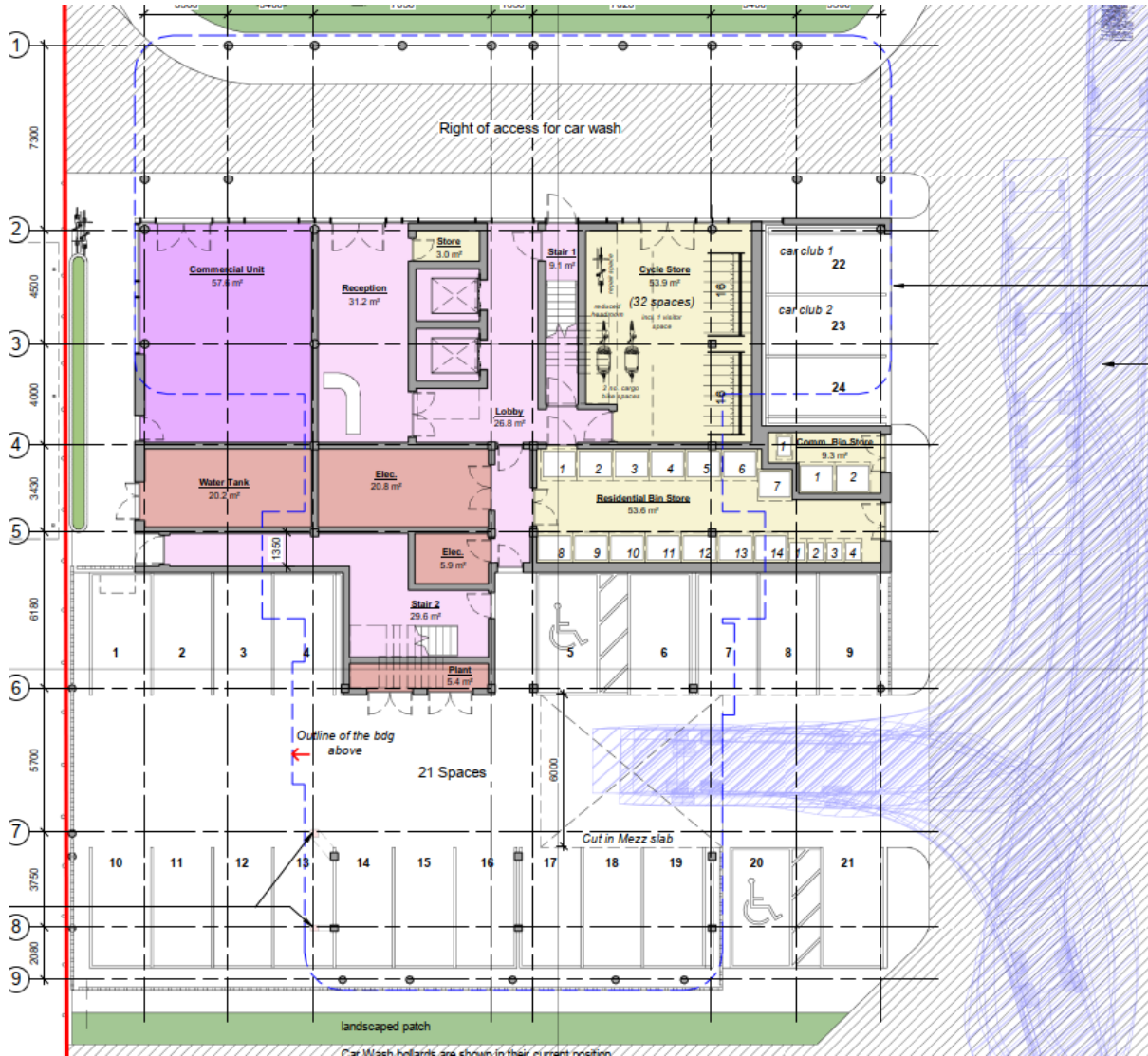
Source: Holders Mathias Architects, Ground Floor Plan, Rev. P06

- 3.3.10. The waste store will be designed to the standards detailed within BS5906:2005. In summary, the facilities will include the following:
  - A suitable water point in close proximity to allow washing down;
  - All surfaces sealed with a suitable wash proof finish (vinyl, tiles, etc);
  - All surfaces easy to clean;
  - Suitable floor drain; and
  - Suitable lighting and ventilation.
- 3.3.11. On nominated collection days, the refuse collection vehicle (RCV) will park adjacent to the waste store and the council's waste collection operatives will collect bins directly from the waste store at ground floor level to be emptied, before promptly returning these to the residential waste store. The waste store is within 10m of the RCV.
- 3.3.12. In accordance with the Guidance, the path between the residential waste store and RCV will:
  - Be free of kerbs or steps (a dropped kerb may be required);
  - Have a solid foundation;
  - Be rendered with a smooth, continuous finish (a cobble surface is unsuitable for any type of wheeled container);

- Be level, should be no more than 1:12 gradient, falling away from the bin store; and
- Minimum of 1.5m width.

3.3.13. **Figure 3-3** shows the swept path analysis for the Proposed Development.

**Figure 3-3 – Swept Path Analysis**



Source: Holders Mathias Architects, Ground Floor Plan, Rev. P06

## 4. MANAGEMENT OF COMMERCIAL WASTE

### 4.1. INTRODUCTION

4.1.1. This chapter outlines the proposed strategy that will be adopted to manage commercial waste arising from the Proposed Development.

### 4.2. WASTE GENERATION MODEL

4.2.1. Estimated commercial waste generation from the Proposed Development have been quantified based on waste generation metrics taken from BS5906:2005. The waste generation metrics are summarised below in **Table 4-1**.

**Table 4-1 – British Standards Waste Generation Metric**

Use	Waste Generation Metric	Assumptions
Class E	Volume per number of covers [75 litres]	<ul style="list-style-type: none"> <li>Assumes restaurant use as worst-case scenario for waste generation.</li> <li>Assumes one cover per 2.5m<sup>2</sup>.</li> <li>Assumes following waste stream split:                             <ul style="list-style-type: none"> <li>50% refuse;</li> <li>40% recycling; and</li> <li>10% food waste.</li> </ul> </li> </ul>

4.2.2. **Table 4-2** summarises the assumed uses and areas of the flexible commercial space within the Proposed Development.

**Table 4-2 – Commercial Area Schedule**

Use	GIA (m <sup>2</sup> )
Class E	57.6

4.2.3. Based on the areas shown in **Table 4-2**, and the waste generation metric detailed in **Table 4-1**, **Table 4-3** summarises the estimated weekly commercial waste arising from the Proposed Development.

**Table 4-3 – Estimated Waste Volumes**

Use	Total Waste (Litres)	Total Refuse (Litres)	Total Recycling (Litres)	Total Food Waste (Litres)
Class E	1,728	864	691	173

4.2.4. Based on the estimated levels of commercial waste arising from the Proposed Development, **Table 4-4** summaries the number and type of bins that will be required based on a weekly collection frequency.

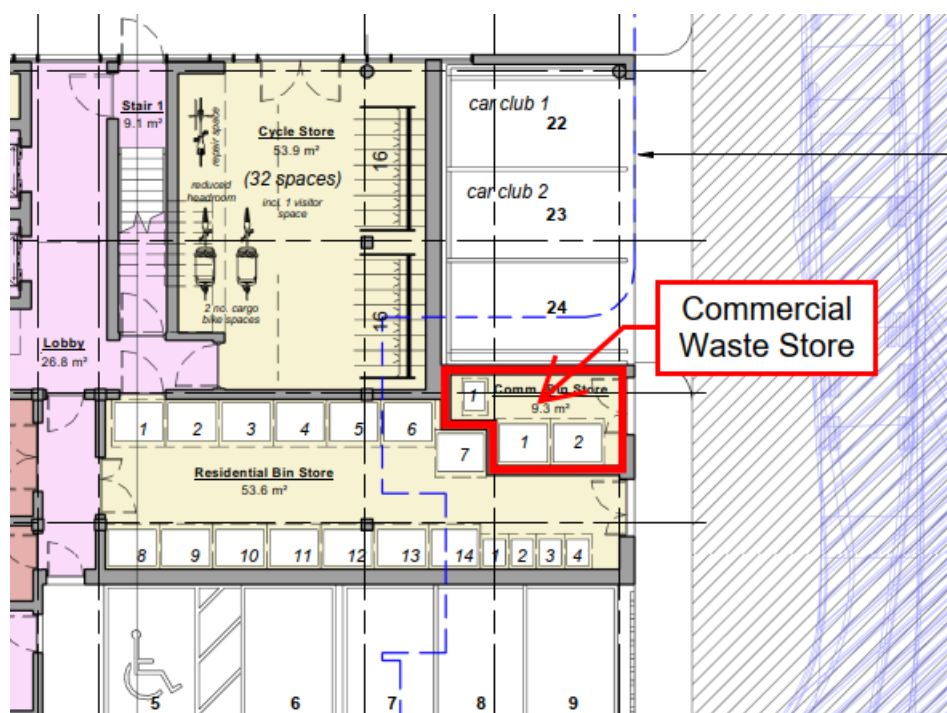
**Table 4-4 – Bin Number Requirements**

Use	Refuse - 1,100 Litre Eurobins (No.)	Recycling - 1,100 Litre Eurobins (No.)	Food Waste - 240 Litre Bins (No.)
Class E	1	1	1

### 4.3. PROPOSED WASTE MANAGEMENT STRATEGY

- 4.3.1. It is proposed that the commercial unit will be required to provide an interim waste storage within their premise’s, which is where waste will be store prior to being moved to the commercial waste storage area. The unit should have sufficient capacity to allow refuse, recycling and food to be segregated.
- 4.3.2. The tenant within the commercial unit will be provided with a waste storage area that is sufficient to accommodate the bins shown in **Table 4-4**.
- 4.3.3. The location of the commercial waste storage area is shown in **Figure 4-1**.

**Figure 4-1 - Commercial Waste Storage Area Location**



Source: Holders Mathias Architects, Ground Floor Plan, Rev. P06

- 4.3.4. The commercial tenant will be responsible for transporting their own wastes to the waste storage area, and for appointing a suitable licensed commercial waste contractor to collect the waste.
- 4.3.5. The tenant will be responsible for managing and monitoring the waste storage area, including:
  - Day to day management;
  - Cleaning of the bins, and surrounding surfaces;

- Regularly monitoring the use of the waste storage area, and where practical, safe removing contaminants from bins;
- When persistent contamination of bins is identified, endeavour to identify the source and provide additional advice and guidance;
- Provide ad-hoc leaflet and poster campaigns for their staff using resources provided by their appointed commercial waste contractor to encourage segregation of wastes in a compliant manner and to use the waste facilities correctly; and
- If available/provided by the appointed commercial waste contractor, regularly update staff with published actual waste and recycling data to encourage best practice.

4.3.6. On waste collection days, the commercial waste management contractor appointed by the tenant will park their RCV adjacent to the waste store and collect the bins directly, before promptly returning them.

## 5. SUMMARY & CONCLUSION

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### 5.1. SUMMARY

#### **Management of Residential Waste**

- 5.1.1. All residential dwellings will incorporate sufficient internal waste storage containers to promote the separation of recycling and food waste at source.
- 5.1.2. Bin numbers have been quantified using residential waste generation metrics detailed within the British Standards BS 5906:2005 *Waste management in buildings – Code of practice*.
- 5.1.3. Residents will be responsible for transferring waste from their homes to the waste store, and for separating their refuse, recycling and food waste into the appropriate containers.
- 5.1.4. The councils waste management contractor will park adjacent to the waste store and will collect the bins directly from the store. Emptied bins will be returned to the waste store.

#### **Management of Commercial Waste**

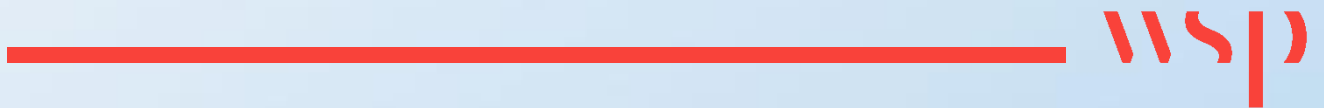
- 5.1.5. The tenant of the commercial unit will provide interim waste storage areas within their tenanted area for the storage and segregation of their wastes.
- 5.1.6. At regular intervals the commercial tenant's staff will be responsible for transferring waste from their respective unit to dedicated commercial waste stores.
- 5.1.7. A commercial waste store will be provided at ground floor level, which will be designed in accordance with British Standards *BS 5906:2005 Waste management in buildings – Code of practice*.
- 5.1.8. On collection days, the commercial waste management contractor appointed by the tenant will access the waste store directly and transfer bins out to the RCV to be emptied, before promptly returning the bins to the waste store.

### 5.2. CONCLUSION

- 5.2.1. This Strategy has considered the need to lessen the overall impact of waste generation through the provision of dedicated storage for recycling and food waste from the operation and occupation of the Proposed Development.
- 5.2.2. The proposals set out in this report meet the requirements of relevant waste policy and follow applicable guidance.

# Appendix A

## **NATIONAL AND LOCAL WASTE POLICY & GUIDANCE**



## National Waste Policy

### **National Planning Policy Framework (Updated 2024)<sup>1</sup>**

The National Planning Policy Framework, published in 2012 and last updated in December 2024, sets out the government's planning policies for England and how these are expected to be applied.

The following extracts are of relevance to the Proposed Development:

*'2. Achieving sustainable development*

...

*8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

...

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

### **National Planning Policy for Waste (2014)<sup>2</sup>**

The National Planning Policy for Waste sets out detailed waste planning policies. It should be read in conjunction with the NPPF and the Waste Management Plan for England.

The Policy includes the following which is of relevance to the Proposed Development:

*'8. When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:*

*new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape.'*

### **Our Waste, Our Resources: A Strategy for England (2018)<sup>3</sup>**

The strategy sets out how England will preserve the stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. At the same time, the

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<sup>1</sup> Ministry of Housing, Communities and Local Government (MHCLG) (2024) *National Planning Policy Framework* [National Planning Policy Framework](#)

<sup>2</sup> MHCLG (2014) *National Planning Policy for Waste* [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

<sup>3</sup> Department for Environment, Food and Rural Affairs (Defra) (2018) *Our Waste, Our Resources: A Strategy for England* [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

country will minimise the damage caused to the natural environment by reducing and managing waste safely and carefully, and by tackling waste crime.

It combines actions the country will take now, with firm commitments for the coming years and gives a clear longer-term policy direction in line with the 25 Year Environment Plan. This is the blueprint for eliminating avoidable plastic waste over the lifetime of the 25 Year Plan, doubling resource productivity, and eliminating avoidable waste of all kinds by 2050.

### **Waste Management Plan for England (2021)<sup>4</sup>**

The Waste Management Plan for England fulfils the requirements of the Waste (England and Wales) Regulations 2011 for waste management plans to be reviewed every six years.

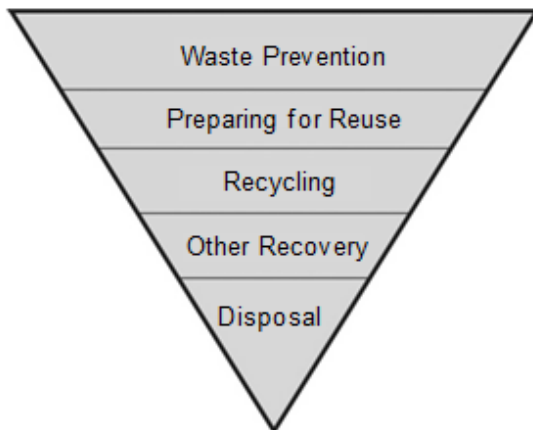
While the Resources and Waste Strategy sets out a vision and a number of policies to move to a more circular economy, such as waste prevention through policies to support reuse, repair and remanufacture activities, the Waste Management Plan for England focuses on waste arisings and their management. It is a high-level, non-site specific document. It provides an analysis of the current waste management situation in England and evaluates how the Plan will support implementation of the objectives and provisions of the Waste (England and Wales) Regulations 2011.

### **Waste Hierarchy**

The Waste Hierarchy requires avoidance of waste in the first instance followed by reducing the volume that requires disposal after it has been generated.

It gives an order of preference for waste management options to minimise the volume for disposal, as shown in **Figure A-1**.

**Figure A-1: The Waste Hierarchy**



Source: Waste Framework Directive

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<sup>4</sup> Defra (2021) *Waste Management Plan for England*  
<https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

The main principles of the Waste Hierarchy are:

- Waste should be prevented or reduced at source as far as possible;
- Where waste cannot be prevented, waste materials or products should be reused directly or refurbished and then reused;
- Waste materials should be recycled or reprocessed into a form that allows them to be reclaimed as a secondary raw material;
- Where useful secondary materials cannot be reclaimed, the energy content of the waste should be recovered and used as a substitute for non-renewable energy resources; and
- Only if waste cannot be prevented, reclaimed or recovered, should it be disposed of into the environment and this should only be undertaken in a controlled manner.

The Waste Hierarchy has been implemented in England and Wales by the Waste (England and Wales) Regulations 2011. These regulations require that an establishment or undertaking that imports, produces, collects, transports, recovers or disposes of waste must take reasonable steps to apply the Waste Hierarchy when waste is transferred or disposed of.

## **Local Waste Policy and Guidance**

### **Adur Local Plan (2017)<sup>5</sup>**

The Adur Local Plan provides a strategy for development in Adur up to 2032. It seeks to achieve a balance between meeting the needs for development- such as housing, employment, retail and community facilities - while striving to protect and enhance the character and feature of Adur.

With regards to waste management, the following policy is of relevance to the Proposed Development.

*'Policy 15: Quality of the Built Environment and Public Realm.*

- A) Take into account the need for waste reduction and recycling both during the construction and over the lifetime of the development.'*

*'Policy 29: Delivering Infrastructure*

- A) Requires development to provide or contribute to the provision of facilities, infrastructure and services made necessary by development, or where it gives rise to a need for additional or improved infrastructure.*

### **Shoreham Harbour Joint Area Action Plan (2019)<sup>6</sup>**

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<sup>5</sup> ADC (2017) *Adur Local Plan* <https://www.adur-worthing.gov.uk/media/Media.159572.smxx.pdf>

<sup>6</sup> ADC (2017) *Shoreham Harbour Joint Area Action Plan* <https://www.adur-worthing.gov.uk/media/Media.156282.smxx.pdf>

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The Shoreham Harbour Joint Area Action Plan (JAAP) is a strategy for the regeneration of Shoreham Harbour and surrounding areas. It includes proposals and policies for new housing and employment generating floor-space; and for upgraded flood defences, recreational and community facilities, sustainable travel, environmental and green infrastructure improvements.

With regards to waste management, the following policy is of relevance to the Proposed Development.

*Policy SH7: Natural Environment, Biodiversity and Green Infrastructure*

*19. All development proposals will be required to incorporate facilities that enable and encourage high rates of recycling and re-use of waste and materials.*

*20. All new development will be required to demonstrate that waste is minimised both during the construction phase and the lifetime of the building.*

*21. Development proposals shall be accompanied by a Site Waste Management Plan.*

**Adur & Worthing Councils Household Waste and Recycling Collection Policy (2021)<sup>7</sup>**

The policy and guidance details and informs all relevant parties such as architects and residents in respect of the Household Waste and Recycling Collection Policy. This includes guidance on the waste storage and collection requirements that should be considered for residential developments.

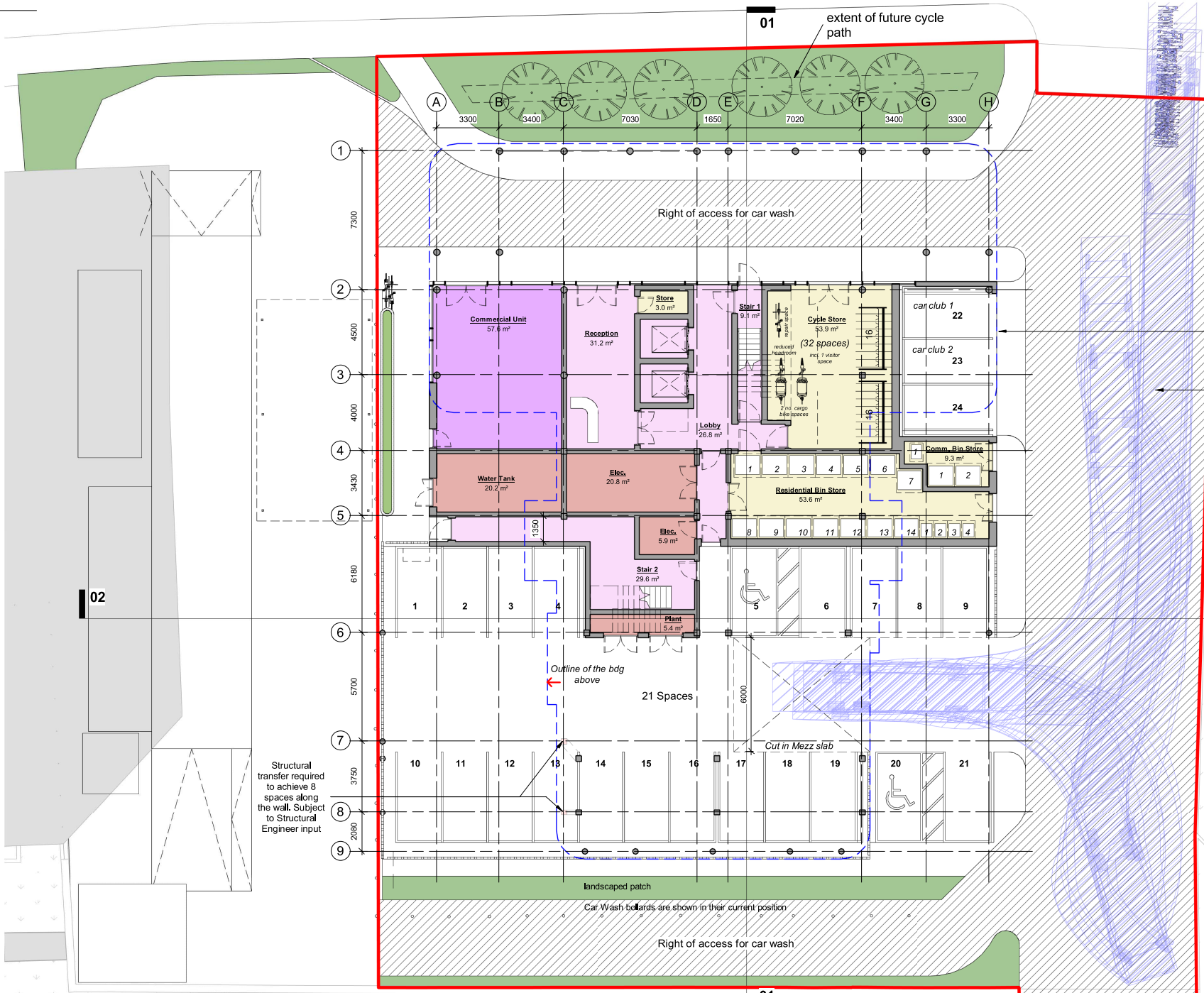
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<sup>7</sup> ADC (2021) Household Waste and Recycling Collection Policy <https://www.adur-worthing.gov.uk/media/Media.104513.smx.pdf>

# Appendix B

## GROUND FLOOR PLAN





**Note:**  
 1. The site plan within the site boundary is based on survey drawings completed in March 2024.  
 2. The Free Wharf plan is indicative only, relying on the latest publicly available drawings.  
 3. Structural, M&E and Landscape elements are only illustrative at this stage and will be developed by the relevant consultants at a later stage.

- BOH
- Circulation
- Commercial
- M+E

Outline of Building Above (Upper Ground - Level 4)

Vehicle Tracking provided by WSP

Rev	Status	Date	Check	Description
P06	S0	28.04.25	NC	Ground Floor layout amended, parking numbers increased, the main core mirrored.
P05	S0	12.12.24	NC	Undercroft extended
P04	S0	06.12.24	NC	Surrounding building heights added
P03	S0	25.09.24	NC	Landscape strip and bin stores amended
P02	S0	10.09.24	NC	General Amendments
P01	S0	29.08.24	NC	First Issue

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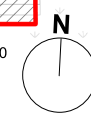
Title  
 (+4.40) Ground Floor Plan

Job No Scale at A3 Classification Status Revision  
 4713 As indicated PM\_40\_40\_34 S0 P06

Project - Originator - Functional Breakdown - Spatial Breakdown - Form - Discipline - Number  
**KFSH-HMA-ZZ-00-D-A-00004**

ISO 14001 : 2015 ISO 9001 : 2015 RIBA Chartered Practice  
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**1 +4.40 (00) - Ground Floor**  
 1 : 200





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