

28 March 2019

File No: 2019/123712  
Our Ref: R/2017/28/A  
Your Ref: SSD 8993

Andrew Beattie  
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By email: [Prity.Cleary@planning.nsw.gov.au](mailto:Prity.Cleary@planning.nsw.gov.au)

Dear Andrew,

**State Significant Development SSD 8993 – SCEGGS Darlinghurst concept approval of the 2040 Masterplan and Stage 1 works**

Thank you for your correspondence dated 4 March 2019 which invites the City of Sydney ('the City') to review the SSD application of the SCEGGS Darlinghurst Masterplan and Stage 1 development application.

The proposal includes a masterplan for the main school campus site that includes three main stages:

- **Stage 1** – Demolition of Wilkinson House and construction of a new four storey building on the corner of Forbes Street and St Peters Precinct
- **Stage 2** – New Administration Building / Barham restoration / Revitalised school entry. It is anticipated that the construction of the Stage 2 works, to be detailed in a subsequent detailed DA generally in accordance with the Concept SSD DA.
- **Stage 3** – New Multi-Purpose Building. It is anticipated that the construction of the Stage 3 works, to be detailed in a subsequent detailed DA generally in accordance with the Concept SSD DA.

The application also seeks detailed consent for Stage 1 of the masterplan.

The City has reviewed the information submitted with the proposal and raises a number of significant concerns with the proposal. More detailed comments on the City's concerns may be found within **Attachment A** to this letter.

Should you wish to speak with a Council officer about the above, please contact Vanessa Aziz, Senior Planner, on 9246 7758 or at [vaziz@cityofsydney.nsw.gov.au](mailto:vaziz@cityofsydney.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

**Graham Jahn AM**  
**Director**  
City Planning | Development | Transport

## **ATTACHMENT A**

### **Construction Investment Value (CIV)**

The SEARS requires a QS report that provides a detailed calculation of the CIV of the proposal, including details of all assumptions and components from which the CIV calculation is derived.

The CIV Report prepared by Altus Group does not provide detailed calculations of the CIV or details of all the assumptions and components from which the CIV is derived. Rather it provides a summary of headline cost items. Section 3.0 of the CIV Report states that the cost estimate 'relies upon information, assumptions and exclusions referenced within Cost Plan No. 3 prepared on 30 October 2018'. On this basis it appears that the 'details of all assumptions and components from which the CIV calculation is derived' as required by the SEARS are available but have not been disclosed in the CIV Report or included in the supporting SSD documentation.

The subject proposal is for demolition of 3 buildings, partial demolition of the Barham building, bulk excavation of basement levels for parking and an indoor swimming pool for the new multi-purpose building and construction of three other new buildings of between 3 and 7 storeys in height, conservation works and landscaping. Buildings are proposed to be of high quality materials and finishes. The site has a challenging topography and significant heritage constraints. For these reasons the estimated CIV of \$49,374,200 is questionable in light of the costs of other recent school developments in the City's LGA.

### **Competitive Design Process**

The subject site has an area of 11,519sqm and which exceeds the 5,000sqm threshold established in clauses 7.20(2)(b) and 6.21(5)(c) of the Sydney LEP 2012 (the LEP) that require the development to be the subject of a competitive design process.

The EIS provides an assessment against SEPP (Educational Establishments and Child Care Facilities) 2017 (the Education SEPP) including clause 35(8) which states that a provision in another planning instrument that requires a competitive design process does not apply to school development that has a capital investment value of less than \$50 million.

The estimated CIV of just less than \$50 million would render the LEP requirement for a competitive design process inapplicable pursuant to SEPP clause 35(8).

Accordingly, it is recommended that:

- the details that have informed the submitted CIV Report are provided to satisfy the SEARs requirements;
- upon receipt of the requested information, that the Department arrange for the CIV Report and additional information to be peer reviewed and considered with regard to other recent comparable school developments, with the details of the peer review provided to the City;
- should the peer review find that the development is estimated to have a CIV of more than \$50m, then it is recommended that the proposal be amended to include a design excellence strategy to establish a suitable framework for a competitive design process; and
- due to the scale and extent of the proposal, the site's context, heritage constraints, visibility from and potential impacts upon the public domain, that

any such competitive design process should be an Architectural Design Competition.

### Section 7.11 Contributions

The following developments require a contribution under the City of Sydney Development Contributions Plan 2015:

- development that results in a net population increase; and
- development that is not excluded in accordance with clause 1.3 of the Plan.

The applicant states that the SSD does not include an increase in the population of staff or students and while an independent school is not included in the list of exempted developments, the proposal includes only rebuilt facilities and upgrades that will benefit the recreation and learning needs of students. The applicant further claims that the proposal may result in benefits to the local community through sharing of new facilities such as the potential swimming pool.

The proposed exemption request is not consistent with the Contributions Plan and is not supported. In particular the following should be noted:

- Under the Plan, population is based on the gross floor area of a development. The extract below is the prescribed method to determine a net population increase:

*The net population increase =*

*The proposed residential, workforce & visitor development population –  
The previous residential, workforce & visitor development population*

*The proposed population =*

*The proposed gross floor area, dwellings, rooms, keys and beds ×  
The relevant occupancy rate(s) for the proposed use from Tables 4, 5, 6 and 7*

*The previous population =*

*The previous gross floor area, dwellings, rooms, keys and beds ×  
The relevant occupancy rate(s) for the previous use from Tables 4, 5, 6 and 7*

- The proposal clearly proposes an increase in gross floor area.
- There are no details of the proposed sharing of new facilities with the local community. It is unclear whether the applicant is proposing a joint-use agreement similar to what was negotiated between the NSW Department of Education and the City for the new Alexandria Park Community School and the new Inner Sydney High School.
- The application clearly indicates that the swimming pool is only a possibility that may be provided as part of the final Stage in approximately 2030-2040.

Unless the Department imposes a condition requiring the payment of a contribution in accordance with the Contributions Plan, the City **objects**.

### Demolition of Wilkinson House

Wilkinson House, originally known as Gwydir Flats, was a c1925 residential flat building designed by prominent architect Emil Lawrence Sodersten known for his Art Deco designs. This building is one of his earliest works. Wilkinson House is identified as one of the buildings on the SCEGGS site in Schedule 5 of the LEP 2012:

*I301 - Sydney Church of England Girls Grammar School group including Barham, Church Building and Wilkinson House and their interiors and grounds.*

The State Heritage Inventory identifies Wilkinson House as being:

*...significant for its continuous use since it was built for accommodation and for the long association with SCEGGS boarders and their strong attachment to the building as their 'home'. The building has historic social significance for its association with SCEGGS boarders. The building is historically significant for its association with Emil Sodersten, a key architect of the inter-war period in Sydney. Significant elements include original plaster ceilings to the majority of the building and ability to interpret the original apartment configuration, the intact entry foyer and lobby. (Source: Heritage Assessment: SCEGGS Darlinghurst prepared by the applicant's consultants TKD architects, in 1999)*

The State Heritage Inventory identifies Wilkinson House as having the following significance:

- *Historical significance: Wilkinson House is associated with the historical development of SCEGGS on the Darlinghurst Site for its function as the School boarding house since 1962. (Information sourced from 1999 Tanner & Associates Pty Ltd, "Heritage Assessment SCEGGS Darlinghurst")*
- *Associative significance: Wilkinson House, built 1926 as Gywdir Flats, is historically significant for its association with the architect Emil Sodersten. (Information sourced from 1999 Tanner & Associates Pty Ltd, "Heritage Assessment SCEGGS Darlinghurst")*
- *Aesthetic significance: Wilkinson House is aesthetically significant for its original design intent as residential flats. The flats are evident through the intact decorative plaster ceilings of the original room configurations. In addition the entry foyer is intact and of very high quality. However the exterior of the buildings has not been constructed or resolved to the quality shown in the original drawings by Sodersten. (Information sourced from 1999 Tanner & Associates Pty Ltd, "Heritage Assessment SCEGGS Darlinghurst")*
- *Social significance: Wilkinson House has been associated with the historical development of SCEGGS Darlinghurst over a forty year period, playing an important role in the life of past and present boarders and staff. It continues to provide a focus of memories of their time at the school as well as being associated with traditions that contribute to the continually developing sense of the School's identity. (Information sourced from 2001 Godden Mackay Logan Pty Ltd, "Conservation Management Plan for Wilkinson House")*
- *Representativeness: Wilkinson House is representative of the construction of apartment buildings during the 1920s and of the use of an eclectic collection of architectural styles, displaying references to Inter-war Mediterranean, Spanish Mission and Georgian Revival influences. (Information sourced from 2001 Godden Mackay Logan Pty Ltd, "Conservation Management Plan for Wilkinson House")*

A discussion paper prepared by TKD architects in July 2016 said "The 2001 Conservation Management Plan for the building (Godden Mackay Logan) concludes that Wilkinson House is of local heritage significance for its historic, aesthetic and social values. The building derives architectural significance largely from its exterior form, fabric and streetscape contribution, and historic significance from its association with the inter-war residential flat building boom in the area and as an early work of the architect Emil Sodersten. The report identifies principal internal spaces of significance as the entry foyer, stair and recessed balconies: other spaces are variously assessed as being of moderate and low significance. The rear light well is assessed as being of high significance." The CMP for Wilkinson House by GML also identified original external fabric as being of high significance.

Wilkinson House is also located within East Sydney Heritage Conservation Area and is identified as Contributory item under the LEP and Sydney DCP 2012 (the DCP). As per section 3.9.7 of the DCP, *contributory buildings are to be retained unless the consent authority determines the replacement is justified in exceptional circumstances.*

The Applicant claims that the subject building does not adequately accommodate their desire for larger learning spaces and assesses the significance of Wilkinson House as 'moderate' significance to justify its demolition.

Prior consultation with the City has consistently advised that demolition of the heritage item and contributory item is not supported. The loss of Wilkinson House would be significant and unacceptable. .

### **Demolition of the old gym building**

This 1925 building is not specifically identified in the heritage inventory as being significant but it is part of the heritage listing. It is also part of the Contributory item in the HCA. The HIS grades the significance of this building as moderate which is defined as "*Altered or modified elements. Elements with little heritage value, but which contribute to the overall significance of the item.*" (NSW Heritage Manual – Assessing Heritage Significance). It is considered that cumulatively the demolition of Wilkinson House and the old Gym Building will erode the heritage significance of the heritage listed site. Should the DPE be of the mind to support the proposal as a minimum Wilkinson House should be retained and adaptively reused.

### **Heritage Impact of new Administration Building**

The bulk of the proposed building envelope located between Forbes Street and the existing Barham building is significantly larger than the existing structure. The proposed envelope has the potential to obscure Barham building from Forbes Street.

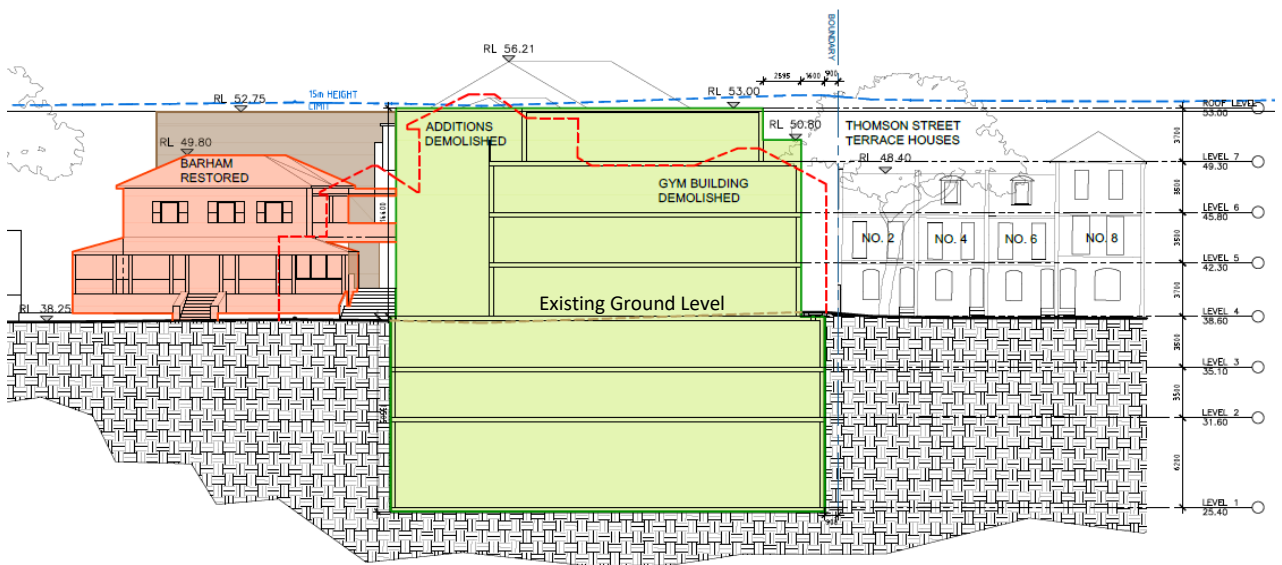
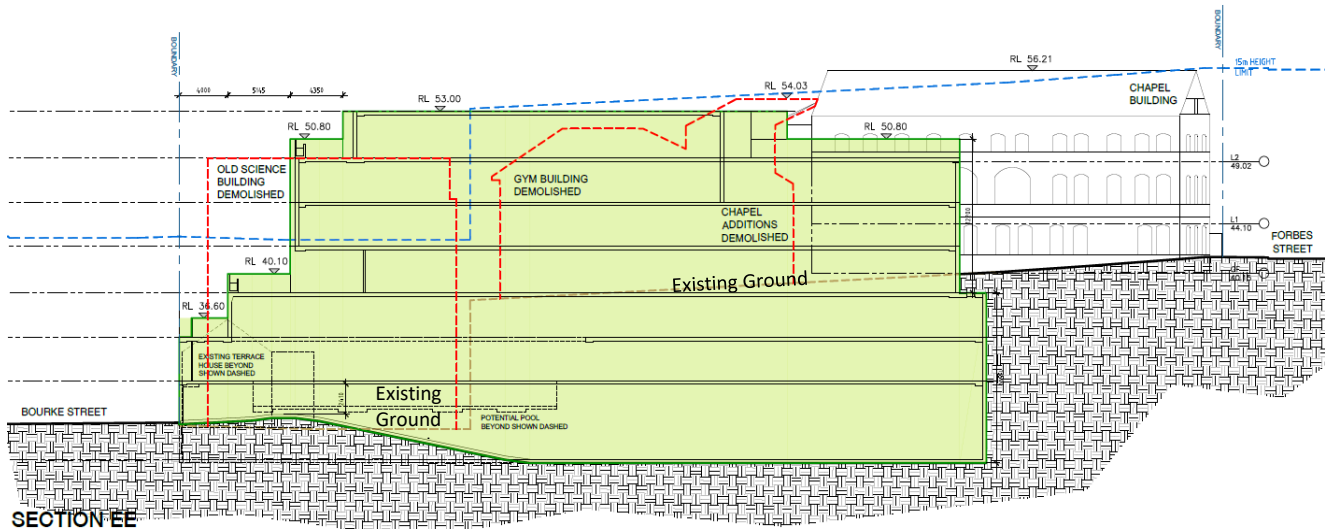
The new building envelope is to the street alignment and has the potential to dominate the Chapel building.

The proposed envelope cannot be supported in its current form and needs further refinement to be sympathetic, particularly to the most important building on the site – the Barham building.

### **Excavation and Sandstone Recycling**

The proposed excavation is significant in scale and located in close proximity to the Chapel with the potential to affect the structural integrity of the Chapel. The southern facade of the multipurpose building is also located in very close proximity to the heritage listed terraces on Thomson Street. There is insufficient information to determine whether the likely impacts are acceptable or not.

The significant amount of excavation, particularly at Stage 3, provides the opportunity to reuse any good quality sandstone on the site, whether on buildings (both existing and proposed) and/or in the landscape design. This should be fully explored.

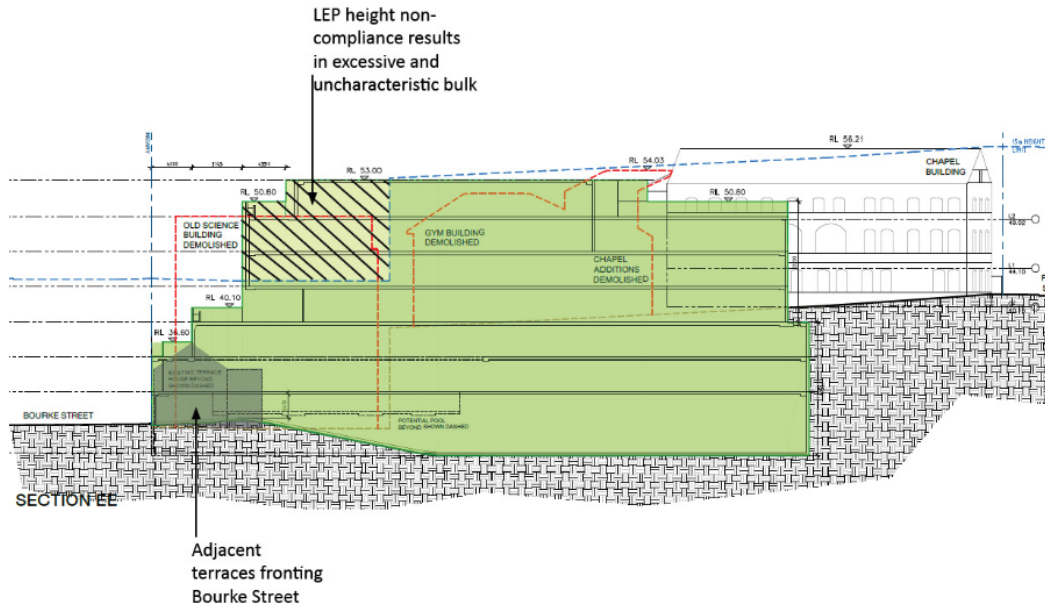


SECTION GG

### Bulk, Scale and Height

In considering whether development exhibits design excellence, the consent authority must have regard to heritage and streetscape constraints and the bulk, massing and modulation of buildings under subclauses 6.21 (4)(d)(iii) and (v) of the LEP. The proposed building envelopes provides a generally appropriate scale to Bourke Street at the boundary, but rises very quickly (in breach of the maximum height) taking cues from the detracting building it is replacing rather than the controls or what is appropriate in the context. Section EE from the submitted drawings shows clearly the breach of height. The result is an envelope that is over-scaled, excessively bulky and too high, resulting in a poor streetscape outcome.

The proposed envelope for the new multi-purpose building would provide a better fit with the context of Bourke Street and the conservation area if it complied with the maximum height control in the LEP. The diagram below shows a preferable outcome that would provide a balance between additional GFA for the school and an improved fit within the streetscape.



### Interface with Bourke Street terraces

A poor and unsympathetic transition is proposed from the existing heritage listed two storey bald face terraces (176-188 Bourke Street – heritage item I219) to the new development in the form of a 3 storey blade wall on the boundary. The blade wall (highlighted in yellow below) abuts an existing prominent chimney with no regard to it. The blade wall transitions to a glass balustrade (highlighted in blue) atop two storey development. While the balustrade could be unobtrusive if set back from the facade, the blade wall is poorly considered. The design should be modified to separate any open space atop the new form from the boundary by a setback (in the order of 2m) rather than a blade wall. Fire separation of windows should be dealt with by sprinklers rather than blade walls on the boundary.

The building within the envelope to Bourke Street should be required to have a 2 storey street edge interface to reflect the characteristic of the conservation area and the predominant streetscape scale of 2 storeys. The vertical and horizontal lines do not relate well to the heritage listed terraces.





### **Overshadowing impact**

The impact on 4 Thomson Street does not comply with the DCP requirement. The dwelling does not meet the minimum requirements, yet is being made worse by the development.

Shadow diagrams in elevation demonstrate that 6 Thomson Street currently receives sun in their front downstairs room from 1pm-3pm. This will be lost due to the proposed development. It is likely this is the window to the main living /dining area within the dwelling.

These impacts are not acceptable.

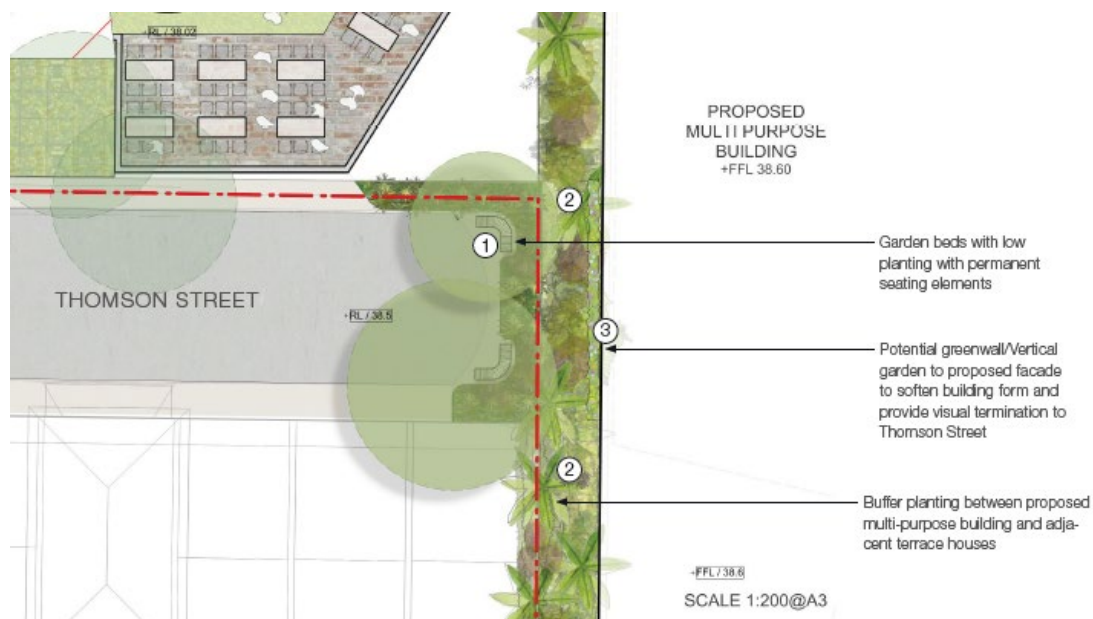
### Scale of the multi-purpose building

Drawing AR.MP.7006 Rev B provides a view of the proposal from 10 and 20 Thomson Street, but not from the closest and most impacted properties adjacent to the proposed multi-purpose building. To enable Council and the community to better understand the impacts of the proposal, a view from 2 Thomson Street should be provided that demonstrates if the proposed envelope has an overbearing impact on the adjoining residential terrace.

The blank walls terminating the view north along Thomson Street have been shown as “green walls” in the view on AR.MP.7006 RevB. This is likely to have been illustrated this way to alleviate the scale and visual impact of the proposed envelope, however it is unlikely such green walls would grow on a south facing wall as shown. It is likely that any wall in this location will be blank and unadorned by greenery, providing a very poor termination to Thomson Street. The proposed envelope of the multi-purpose building is excessively large and does not address the context adequately.

### Premature nature of some works

The submitted masterplan and demolition drawings include the provision of a new Bourke Street driveway, removal of street trees on Bourke Street and Thomson Street, alterations to the existing kerbside parking arrangements on Bourke Street, and removal of trees within the site itself. The landscape drawings also include new public infrastructure in Thomson Street (refer Note 1 in extract below).



It is recommended that in the event of a favourable determination of this SSD, the Department make it clear that no approval is granted for all of these elements, particularly noting the following:

- All these works are associated with the future Stage 2 and 3 of the masterplan (proposed to commence the earliest in 2025 and 2030 respectively). These future Stages will be the subject of separate detailed DAs. It is premature to grant consent to these elements as part of a concept proposal.
- Most of the identified works are on public land outside of the development site. Separate consent is required from the City (including the Local Pedestrian, Cycling and Traffic Calming Committee) for these elements.

## Landscaping

The landscape design focus appears to be increasing the quantum of circulation space and pavements rather than creating rich, textured, shaded places to gather, recreate, and relax in breaks or for outdoor classes.

The section below through the central lawn (p14 – Appendix E – Landscape Plan) highlights the lack of shade, planting and landscape relief being proposed for the staff and students.



There is an opportunity to contribute to the urban canopy however this is not demonstrated in the scheme.

While accepting that the proposal is concept in nature, there is nevertheless an insufficient level of detail to determine if there will be adequate soil depth and volume for the trees and planting located on slab. There is no indicative plant schedule to support the scheme, only landscape character images.

The proposal fails to:

- identify key landscape constraints (e.g. deep soil, existing trees, level changes, privacy etc);
- quantify that basic controls can be met - deep soil, direct sunlight to common open space, 15% canopy cover etc;
- demonstrate the school and outdoor spaces on grade or slab meet the design principles set out in the Government Architect's Better Placed – Design Guide For Schools to provide a richer landscape design proposal (rather than limited landscape spaces that focus on circulation paths); and
- Identify any design requirements that will impact the building envelope, such as shade structures, planters on roof (generating a higher parapet), lift access, and deep soil. These should all be accounted for in the building envelope as part of this application.

It is not clear how the landscape design improves the school and is not at the expense of overdevelopment of the site.

## Car Parking

The EIS clearly indicates that the application presents an opportunity to change travel behaviour through the implementation of a green travel plan to encourage students, staff, parents and visitors to use the available public transport and active forms of transport available surrounding the site.

The existing 112 onsite parking spaces exceed the maximum 86 spaces permitted under the LEP. While the SSD proposes to remove 7 onsite parking spaces from the Forbes St carpark, it proposes a new basement level car park off Bourke St with provision for 22 spaces (15 parking spaces and 7 pick-up/drop-off spaces).

The removal of the Forbes St carpark is supported. The provision of the new Bourke St carpark with 22 spaces is not supported particularly noting the following:

- the EIS clearly indicates that there is no increase in either staff or student numbers as part of this application;
- the Bourke St carpark is part of the future Stage 3 proposed to commence the earliest in 2030;
- Stage 3 is only conceptual in nature and it is not good planning to agree to provision of a non-compliant car park with a precise number of spaces as part of a 'masterplan' application;
- the Bourke St carpark relies upon removal of a street tree, construction of a new driveway and relocation of existing kerbside parking, all of which requires separate approval from the City and the Local Pedestrian, Cycling and Traffic Calming Committee.

It is recommended that the Bourke Street carpark be deleted from any approval of the Concept application.

### **Bicycle Parking and End of Trip Facilities**

The EIS recognises that the School's masterplan is an opportunity to change travel behaviour by encouraging students, staff, parents and visitors to use the available public transport and active forms of transport available surrounding the site.

Given that the subject site is located in close proximity to several separated off-road cycle-ways, off-road shared paths and low-traffic on-road routes in the surrounding area, the School should provide good quality end of trip facilities to encourage people riding to achieve modal shift toward to more sustainable options.

In the absence of a prescribed bicycle parking rate for schools, the minimum rates for tertiary education establishments (1 per 10 staff and 1 per 10 students) is recommended. This should comprise a mix of Class 2 bike facilities and Class 3 bike rails. Based on 185 staff and 942 students some 19 spaces for staff and 50 spaces for students (all Class 2 /AS 2890.3:2015 Class B bicycle parking spaces) are recommended. This should be complemented by a minimum 25 lockers and 2 shower/change areas for staff use as end of trip facilities.

### **Green Travel Plan and Transport Access Guide**

The submitted Green Travel Plan (GTP) and Transport Access Guide (TAG) are acceptable in principle. A condition should be included in any determination by the Department to maintain, update and implement the GTP and TAG.

### **Construction Noise**

Wilkinson House building is proposed to be demolished as part of this application, with noise management levels predicted to exceed the noise criteria by up to 12dB (i.e. background noise level +22dB.) An updated acoustic report should be provided that includes site-specific noise mitigation measures. If major exceedances are still predicted, alternative demolition methodologies need to be considered to ensure that all reasonable and feasible measures to reduce the noise level are fully explored.

Generic recommendations are inadequate. In addition, adequate respite periods must be nominated.

The Department should also ensure that a Construction Noise and Vibration Management Plan is submitted for approval prior to any construction certificate or demolition works commencing at Wilkinson House.

### **Contamination**

A Detailed Environmental Site Investigation (DESI) has not been submitted as per the recommendations of the Preliminary Environmental Site Investigation (PESI).

The DESI should be carried out by a suitably qualified and competent environmental consultant and submitted to the Department for further review in accordance with the NSW Government Office of Environment and Heritage Guidelines for Consultants Reporting on Contaminated Sites, Contaminated Land Management Act 1997 and SEPP 55 (Remediation of Land) confirming that the site is suitable (or will be suitable, after remediation) for the proposed use.

Where the DESI states that the site requires remediation, a Remediation Action Plan (RAP) is to be prepared by a suitably qualified and competent environmental consultant.

In the absence of a DESI, it is submitted that the Department cannot be satisfied that the site is suitable for the proposal under SEPP 55 (Remediation of Land).

### **Stormwater**

The Civil Drawings in Appendix F indicate that stormwater from the new Wilkinson House building will discharge into the existing onsite storage detention tank located in the adjacent car park building, which subsequently discharges into St Peter's Street. As the City will not accept contaminated water discharging into the stormwater system, the Department should ensure that all requirements of the City are met.

In particular, the Department should ensure that the stormwater plan achieves a stormwater quality target as per DCP Part 3.7.3 Stormwater Quality. In this regard, it should be noted that Council has adopted the MUSIC Link – 'Model for Urban Stormwater Improvement Conceptualisation'. It is recommended that the applicant's consultant use this model in submitting any further reports for consideration.

### **Flood Assessment**

The flood assessment appears to have been carried out using PDF maps available on the City's website and the flood planning levels recommended in the Flood Report prepared by Taylor Thomson Whitting (NSW) Pty Ltd. This assessment methodology is not supported as this leads to approximation only.

A revised flood assessment report prepared by a suitably qualified floodplain management professional should be prepared and submitted outlining the flood planning levels required for the subject development to ensure compliance with the City's Interim Floodplain Management Policy.



## **Public Domain**

Due to the extent of works proposed immediately adjoining the public domain, the site's frontages are likely to be damaged during demolition and construction, or will require upgrading and level adjustments.

Should the Department be of the mind to support the application, the City's suite of standard public domain conditions addressing alignment levels, dilapidation reports of the public domain, stormwater and drainage, public domain lighting, submission of public domain plans, protection of stone kerbs and survey infrastructure, provision of security, defects liability periods and the like, should be imposed.

## **Renewable Energy Systems**

It is unclear from the plans and ESD Report as to whether any renewable energy elements are proposed as part of the School's masterplan.

Redevelopment of school buildings across Australia commonly includes solar photovoltaics – irrespective of whether supported by government funding or not. The 'payback' is rapid (as little as 5 years is cited in the ESD report) and students themselves widely expect schools to demonstrate commitment to renewable energy.

The ESD Report considers solar panels for hot water and seems to ignore heat pump options (page 35 of the Architectural Design Report refers only to "energy efficient hot water systems").

Solar hot water or heat pump hot water solutions are logical to reduce the School's dependence upon mains gas as a fuel source.

It is requested that the applicant provide clarification as to whether any renewable energy elements (specifically photovoltaic or solar/heat pump hot water systems) are proposed for the masterplan and Stage 1 works.

## **Water Efficiency and Water Recycling**

The ESD report indicates a rainwater tank that may also receive condensate, with no further details provided. Page 35 of the Architectural Design Report refers to rainwater collection and reuse however end-uses of recycled water are not discussed and no indication of tank size is provided.

The applicant is encouraged to avoid a cosmetic water re-use solution designed to achieve GreenStar compliance only. The applicant should provide detailed information about rainwater tank storage size and smart end-uses – preferably beyond only irrigation.

## **Construction Hours**

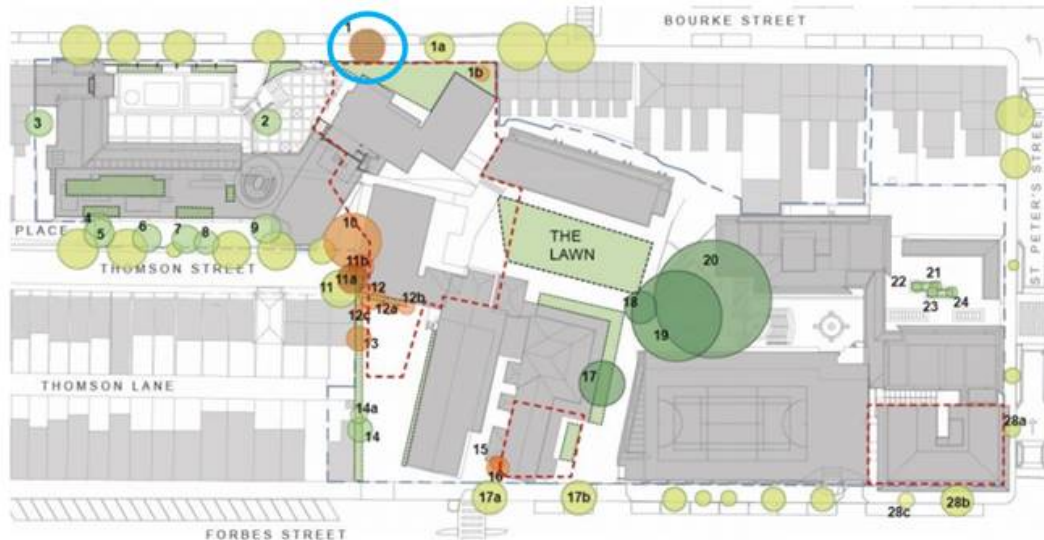
The EIS proposes construction hours between 7am to 6pm, Monday to Friday and 8am to 1pm on Saturdays, with no work on Sundays or public holidays. These proposed construction hours are outside the City's standard hours permitted outside of the CBD.

The City recommends any construction works are to comply with the City's standard hours for construction outside of the CBD.

## Trees

### Tree Retention and Removal

The tree identified as Tree 1 in the Arboricultural Impact Assessment (AIA) proposed for removal is a Council owned tree and is listed as a tree of 'high' retention value. The removal of well-established street trees with high retention values to allow for the installation of a new driveway crossover is not supported.



The four (4) trees marked in blue below have not been included in the AIA. The Landscape Masterplan shows the site boundary extending beneath the canopy of the trees, and the Landscape Analysis and architectural drawings appear to show a basement car park built against the boundary in close proximity to the trees. As such, it is requested that the AIA be amended to include the four (4) trees to form part of the assessment.



There are some inconsistencies between the Arboricultural Impact Assessment (AIA) and the Landscape and Architectural drawings.

It is requested that AIA and Landscape drawings be amended to:

- show all existing trees identified in the AIA (whether they are proposed for retention or removal),

- show Tree Protection Zone radii as identified in the AIA, and
- show all proposed new trees,
- Tree 1 is listed for removal in the AIA, and is shown as requiring removal for the new driveway crossover on the Landscape Analysis, but is shown for retention on the Landscape Masterplan.
- Trees numbered as Trees 2 & 3 in the AIA are listed for retention in the AIA and the Landscape Masterplan, when the Landscape Analysis is showing an underground car park for this area.

**Waste**

The school must have a dedicated and enclosed waste and recycling storage area which has adequate storage area to meet their generation rates.