



Blacktown
City Council

File no: F13/1096

19 October 2018

George Koshy
Director Land Release
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir

Submission on the draft West Schofields Precinct Plan

I refer to the exhibited draft West Schofields Precinct Plan and supporting documentation for the West Schofields Precinct within the North West Growth Area.

We have reviewed the precinct planning documents. Our comments on the draft Precinct Plan are provided in Attachment 1 to this letter. We support the concept of the proposed rezoning of the West Schofields Precinct, but there are serious matters relating to section 7.11 infrastructure that require Government attention prior to the precinct being rezoned. These are:

1. Our inability to immediately levy section 7.11 contributions for this precinct once it is rezoned, given the lengthy Contributions Plan approval process.
2. Unfunded community facility infrastructure throughout the entire North West Growth Centre totalling \$300 m.

We object to the rezoning of the precinct occurring until such time as these significant deficiencies in relation to infrastructure provision are fully addressed.

We appreciate the opportunity of working closely with you throughout the ongoing precinct planning process and to the resolution of these very important issues.

If you would like to discuss this matter further, contact me directly on 9839 6201.

Yours faithfully



Glennys James
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Blacktown City Council submission on the draft West Schofields Precinct Plan

1. Land use zones and precinct layout

1.1 The “Scheduled Lands”

We are concerned about the practical implications of landowners being able to develop the “Scheduled Lands” located between Burfitt Road, Carnavan Road and Bells Creek in the E4 Environmental Living and RU6 Transition zones. The irregularly shaped E2 Environmental Conservation zone in this location has left small constrained lots with no public road access and limited development potential due to the proposed E4 and RU6 zones. It is impractical to develop such irregular shaped land when considering setbacks for Asset Protection Zones (APZ), minimum lot sizes, the cost of building local roads and complying with flood planning controls. It is recommended that the land use zonings in this location be reconsidered to enable a more logical development outcome.

There are a number of isolated pockets of land that are proposed to be zoned E2 Environmental Conservation and RU6 Transition that are not capable of being developed due to their location and size. In particular, there are a significant number of “Scheduled Lands” properties that are proposed to be zoned E2 located below the 1:100 yr ARI where there is no development potential. We don't believe that this is a long term practical viable solution. We suggest that Government consider acquiring these properties to create regionally significant conservation areas as intended by the zoning. Otherwise these lands will continue to be used for unauthorised development activity. Additionally, the ownership, restoration and management of RU6 zoned lands along Eastern Creek need to be addressed.

1.2 Gas pipeline easement

- a. We are concerned about the development interface with the significant gas pipeline easement running north-south through the Precinct, in particular, the proposed residential zoned land south of the Burdekin Road extension. We understand that there may be restrictions in terms of the location of boundary fences to residential properties and the need to retain open access to the easement.
- b. We therefore suggest that one of the parallel local roads be relocated to directly abut the easement, similar to the approach taken north of the Burdekin Road extension. This would then only allow residential development on one side, with a residential boundary fence on the easement and open access adjoining a road on the other side.

2. Open space and recreation

2.1 Sports facilities

There were 3 broad categories of sport facilities to be provided as part of the West Schofields Precinct Plan. These are discussed below:

a. Playing fields for the West Schofields Precinct

Based on a maximum projected population of 14,381 people, the West Schofields Precinct Plan generates a demand for 4 double playing fields. The draft Precinct Plan provided this required number of fields, covering 19.1 ha. We recommend that this provision be retained in the final Precinct Plan.

b. Shortfall of 5 double playing fields from the Riverstone and Alex Avenue Precincts

The draft Precinct Plan provides for 5 new double playing fields to address the shortfall from the Riverstone and Alex Avenue Precinct Plans - 4 around the existing playing fields at Riverstone Park and one located further south next to Neville Road. The existing Riverstone Park playing fields should not be counted in the 5 double playing fields required for the Riverstone and Alex Avenue Precincts.

c. Open space and playing fields to address greater North West Growth Area (NWGA) shortfall

Due to increased densities occurring across the NWGA, the actual projected total population has significantly increased above planned estimates. Our analysis estimates, up to the end of 2017, there is already approximately 4,300 additional people in the rezoned precincts in the NWGA above the planned estimates, requiring an additional 12 ha of open space (both passive and active). This disparity is projected to increase further if current trends continue.

We previously agreed with the Department that an additional 5 double playing fields would be provided within this Precinct to address the shortfall across the NWGA based on older historic analysis.

The draft Precinct Plan provides only 3 additional playing fields within the West Schofields Precinct. We therefore request that at least an additional 2 double playing fields are identified in the West Schofields Precinct.

Contributions for these additional playing fields will be levied across multiple precincts. In order to support contributions planning and discussions with IPART, we request that a post-exhibition technical report be prepared that clearly identifies the need for the additional playing fields and open space, acknowledging our analysis of development activity to date across the NWGA. This is a significant issue that must be addressed, and there is an opportunity to do so in this Precinct.

2.2 Landfill site opportunities

- a. There are 3 landfill sites identified across the West Schofields Precinct. These sites can provide opportunities for sport and active recreation activities in the future. One such opportunity is mountain biking, which is an Olympic sport and one where there is a clear lack of facilities in Western Sydney and the NWGA.
- b. The landfill sites in the north-east and central parts of the Precinct may be viable options for such a use. The north-east site in particular has potential connections to supporting infrastructure associated with the proposed surrounding playing fields, such as 3 car parking and amenities facilities.

2.3 Green Grid

- a. The NSW Government Architect Office (GAO) has developed a 'Green Grid' for Sydney and drafted a toolkit on open space and recreation which includes metrics for open space provision.
- b. We understand that the GAO has viewed an earlier draft of the ILP. We recommend that the latest version of draft ILP be referred to the GAO for further review, to examine how proposed open space provisions in the ILP compare to the proposed metrics in the toolkit. The GAO can also advise on potential Green Grid opportunities within the West Schofields Precinct and to adjoining precincts.
- c. In particular, we suggest that Government consider Green Grid connections at the confluence of Eastern Creek and Bells Creek north of Burfitt Road, which is largely on land beneath the 1:100 yr flood extent with limited development potential. This would create a regionally significant concentration of conservation land, riparian corridors and open space (active and passive). We welcome further discussions on this matter.

2.4 Transport Corridor

The future transport corridor alignment appears to go through a stanchion and part of the Grange Avenue waste site. This may impact on the viability / costs of the corridor. We recommend raising this issue with Transport for NSW and Transgrid to reconsider the alignment.

2.5 Connectivity along the outer edge of residential development

We seek an arrangement that allows the outer edge of residential development to be accessible and connected. Without this 'loop', residential development terminates at the flood lines, and there is no activation. We believe this outcome is achievable without resolving the long-term ownership of the riparian corridor. We recommend seeking input from the GAO and the Department of Planning and Environment's Director Open Space and Parklands.

2.6 Local parks

We support the amount and catchment distribution of local parks in the draft Precinct Plan. It demonstrates that all residents will be within a 500 m catchment to a local park, without gaps, and the medium density residential development around the local centre will be within 300 m of a town park.

2.7 Proposed RE1 strip along the electricity easement

A short narrow strip of land is proposed to be zoned RE1 adjacent to the transmission easement south of Schofields Road. This does not seem to have sufficient purpose to be acquired as open space. We do not support the zoning and acquisition of this land as RE1 Public Recreation.

2.8 Potential contamination on land proposed for public use

Certain land in the northern part of the Precinct that is proposed to be zoned RE1 Public Recreation may present a significant contamination risk for us, as these sites have been used as a recycling centre and a scrap yard. Based on the latest available aerial photos, the sites contain scrap vehicles and sheds which may result in heavy metal contamination.

We therefore request that a Level 1 Contamination Assessment be undertaken of all land to be acquired by us, including details of the costs of remediation. If the results prove unsatisfactory or preliminary indications suggest a Level 3 contamination study is required, the use of that land for a public purpose may need to be reconsidered.

3. Biodiversity

3.1 East – west habitat stepping stones

- a. Habitat stepping stones are an important element in creating ecological corridors to reduce the impacts of fragmentation caused by development. Whilst the total amount of land to be conserved is 5.4 ha more than required, these are concentrated solely along the Bells Creek and Eastern Creek corridors, providing habitat corridors along the north - south alignment only. The ILP does not provide for any habitat corridor linkages along the east - west alignment.
- b. There is potential to retain a few key bushland elements of Cumberland Plain Woodland with certified lands to provide 'stepping stones' to allow the movement of flora and fauna between Bells Creek and Eastern Creek. We are willing to work with you to explore opportunities for this to occur.

3.2 Asset Protection Zones

We want to confirm that Asset Protection Zones are not to be located within ENV on any lands zoned E2 Environmental Conservation. These setbacks should be located on development lots so that the existing valuable ENV is not reduced.

4. Heritage

There are 2 significant heritage issues that need further consideration. These are:

- a. The historic terrace building at 4 West Parade, Riverstone has been omitted from the proposed heritage schedule.
- b. The Aboriginal burial ground in Angus Road (near Durham Road) has been redacted (struck out in black) in the exhibited documents.

4.1 European heritage

- a. There is a locally significant heritage item identified in Schedule 5 of *Blacktown Local Environmental Plan 2015* that has not been carried over to the Precinct Plan and Heritage SEPP map. This relates to 2 terraces at 4 West Parade (Lot 1 DP 1001550) (Local item I68). The non-indigenous heritage map plots 22 West Parade (Lot 1 DP 502547) (Local item I94), but the terraces at 4 West Parade also need to be included as they are also of heritage significance.
- b. These terraces are representative of the Victorian building stock constructed around the Riverstone Town Centre and around the node of the railway line. The building forms part of a heritage precinct which also comprises the former butcher's shop at 4 Garfield Road East and the Station Master's Cottage. Whilst it is understood that there is some uncertainty about the potential railway overpass or road widening by the RMS at this location, it still should be identified as a heritage item in the heritage schedule attached to the Precinct Plan.
- c. These terraces are rare in Blacktown, with only one other terrace building located in the area (Garfield Road West, Riverstone). Its rarity makes it more significant so it should be identified.

4.2 Aboriginal heritage

- a. It is noted that the Aboriginal Cultural Heritage Assessment Report has had references to sensitive Aboriginal matters redacted (struck out in black), so the general public is unable to ascertain the exact nature of the sensitive Aboriginal places.

- b. We have received representations about an Aboriginal burial ground that is located in Angus Road, Schofields. Members of the public have voiced their concerns that the burial ground is not recognised. There is a belief that the burial site is located just off Durham Road. However, more detailed investigations have isolated it to a flood affected area in Angus Road which has been proposed to be zoned as RE1 Public Recreation with unlimited public access. The land in Durham Road has a proposed residential zoning nominated over it.
- c. We suggest that you involve the Aboriginal community in further discussions on how best to deal with the sacred Aboriginal burial ground and to suggest the most appropriate zoning, as future land uses could impact on their sacred sites.

5. Traffic and transport

5.1 Road network

We are generally satisfied with the proposed road network and hierarchy as depicted on Figures 4 and 21 of the Traffic and Transport Study prepared by Arup. We do however have the following specific comments on aspects of the report:

a. Strategic network modelling

- i. Traffic modelling assumptions were not described in the report.
- ii. Figures 19 and 20 show the output of AM and PM modelled traffic flows. The results show that the majority of the proposed roads within the Precinct are likely to operate with acceptable mid-block levels of service. However, turning volumes at the intersections are still unknown.
- iii. Section 5.6.4 discusses a number of existing internal roads within the Precinct that have been identified for improvement to form the framework for the higher order road network. These include Vine St West (now called Excelsior Avenue), Grange Avenue, Carnarvon Road and potentially the Quakers Road extension. However, the report does not mention what improvement works are required.

b. Intersections within the Precinct

- i. Traffic signals
 - Table 9, and Figures 22 and 23, indicate various intersection controls. The study recommended 4 new signalised intersections (refer Section 5.7) without stating when those proposed signals will meet RMS Traffic Signal warrants. We have asked previously that warrant checks be undertaken as part of the study. Arup attached the warrant description in Table 10 for no reason instead of checking warrants for the proposed traffic signals.
- ii. SIDRA analysis
 - The cycle times of 120 seconds for minor intersections appears to be in error for:
 - Schofields Road/Carnarvon Road
 - Schofields Road/Internal Road 1
 - Townson Road/Victory Road
 - Townson Road/Internal Road 2.

- The Schofields Road/Internal Road 1 right turn phase requires further explanation as the right turn along the major road (Schofields Road) is a filter right turn, whereas for a minor road (Internal Road 1) there is a separate right turn phase.
- It is also noted that there are 391 vehicles turning right from the north approach which is very high volume. It requires explanation where such a large number is coming from.

c. Miscellaneous road network matters

- Road intersections need to include space for roundabouts. This will affect acquisition areas. Arup only shows typical layouts. Further design work is required and extra areas need to be shown on acquisition and zoning maps.
- There are discrepancies between the traffic report, ILP and DCP Figure 14. The traffic report shows Vine Street / Excelsior Avenue connecting across Bells Creek, but not the ILP and DCP. The inclusion of a crossing of Bells Creek at this location could be very expensive.
- DCP Figures 15, 16 and 18 all show different widths for the shared user path. The widths should be the same.
- DCP Figure 19 relating to path connections at Burfitt Road across Eastern Creek should be realigned to connect to RE1 land in the Schofields Precinct. Crossings of Bells Creek at Burfitt Road and Excelsior Avenue are unnecessary and costly.

5.2 Public transport

We support the need for adequate public transport provision for the Precinct and note the improvement in the public transport section of the report. However, we would like to see the following in the report:

- Bus route and bus stop locations to be identified.
- All bus stops to meet latest requirements for the Disability Standards for Accessible Public Transport (DSAPT) and the Disability Discrimination Act (DDA).
- It is desirable that bus shelters be installed at all bus stops.

5.3 Walking and cycling

We support the need for adequate walking and cycling in the Precinct, and the suggested bicycle and pedestrian network map in the draft DCP. However, the Traffic Report still does not provide any map showing proposed routes and their connection to the existing and planned walking and cycling network. A few statements on the importance of walking and cycling are included in the report, in particular about a potential formal off road cycle facility to connect Townson Road with Stonecutters Drive around the back of the golf course via Eastern Creek. However, investigation and funding for this cycle route has not been proposed.

6. Water Cycle management

6.1 Water Cycle Management Plan

- The report does not mention the detention requirements, which was a major issue in all previous Precincts. The report should acknowledge the proposed '*reduced basin strategy*' by Council and explain why detention is not required. Then refer the reader to that study for more information.

- b. Passive watering of street trees is not considered in the Growth Centre and breaks in kerbs will not be provided.
- c. In relation to water quality, the 7 basins are quite large and multi celled with ponds for additional treatment. This style of treatment has limited acceptance with our current landscape guidelines. Where bio retention basins have filter areas in excess of 3,000 m², consideration should be given to the provision of a wetland. This has implications for the design of the infrastructure as wetlands have a greater land take and may not fit within the SP2 zoned land allocation.
- d. The main omission from the plan is the management of overland flow and trunk drainage. The report does identify a proposed drainage network (see Figure 6.1), but there are no calculations to size any of the drainage and whether it may be either channelised or trunk culverts. Four of the catchments are in the range of 37 – 45 ha and would expect to generate a 100 yr ARI flow in the range of 10 to 15 m³/s. The extent of trunk drainage that should be included in the Contributions Plan needs to be identified.
- e. Catchment C is of particular concern, as it is unclear how the trunk drainage will be conveyed from the southern side of South Street to the basins. This drainage is shown to go through RU6 zoned land which we are not acquiring. If we cannot cost this in a Contributions Plan for acquisition and construction, it will never be done.
- f. The concept design for the bio-retention basins has not provided any allowance for the management of trunk drainage (i.e. up to the 100 yr ARI) through the site to the creeks. As a result it appears that many of the SP2 basin areas are undersized.
- g. There also appears to be insufficient information on the tailout to the creek. There should be at least a section through the basins showing the vertical relationship from the creek, through the basin and GPT to the road network. Generally the concept sketches on all the facilities are poor and lacking details.
- h. The estimates seem a bit light, as the excavation will need to be removed from site due to the fragmented ownership of the Precinct. There should be some allowance provided in the estimates for the design of the infrastructure.
- i. For Basin B there needs to be an allowance of \$500,000 for an AHIP given the proximity to the significant heritage site.

6.2 Flood Evacuation Study

- a. This is very much a 'motherhood' document and is extremely light on details. It does not address the most important issue, which is in the interim solution until the entire infrastructure is provided. The evacuation strategy does not provide sufficient information on what measures are required and when.
- b. The main issue with evacuation in the interim case is the capacity of the proposed interim route described in the Water Cycle Management Plan, and we note this is not described in the Flood Evacuation Study. This route is critical to the evacuation of the Precinct, as South Street will be impacted by the wider evacuation of the Windsor area and Schofields Road is not an evacuation route, due to the low trapped sag under the railway line. The other route out of the area is over Bells Creek on Townson Road, which is low and will get cut early in a flood. It is critical that we determine the level of occupation within the Precinct that can be allowed until the interim route becomes saturated.
- c. This then becomes a trigger point for the provision of the Townson / Burdekin Roads route to provide the final evacuation route from the Precinct. It should be noted this is a very large piece of infrastructure with bridges over Eastern and Bells Creek and then over the railway line.

6.3 Indicative Layout Plan and DCP

- a. There are a number of locations along Bells Creek where the SP2 zoning goes into the adjoining western properties. The concept design does not use this land. These areas will be difficult to acquire and serve no purpose. They should be zoned E2 to match the existing zoning on the eastern of the creek.
- b. There is an area around South Street where Catchment C trunk drainage needs to cross the road. It needs a practical solution how this can be done.
- c. DCP Figure 3 relating to drainage diagrams do not describe what drainage works are being provided. These should be identified as bio-retention systems. There also needs to be an indication of trunk drainage that is required.

7. Sustainable resources

- 7.1 We are concerned about the impact of landfill gas risk from Grange Avenue Reserve upon the surrounding areas proposed for residential and public uses. We strongly recommend that necessary measures be taken to determine the safe proximity of residential premises to the site. Further investigation and monitoring of surrounding areas should be carried out to determine the appropriate buffer around the landfill site.
- 7.2 The Grange Avenue landfill site needs to be further assessed for suitability for future development as a useable open space area.
- 7.3 The landfill gas risk assessment for Grange Avenue Reserve needs further work to address unresolved issues and needs to recommend specific measures to ensure the safety of development in proximity to the landfill site. We have previously raised detailed comments on this in our letter dated 9 May 2018.

8. Residential development controls on land between the 1:100 year flood event and the PMF

8.1 Flood evacuation

- a. We acknowledge the significant flood exposure of land within the Hawkesbury-Nepean Valley and the need to develop a planning framework to address this flood risk. The Precinct Plan has been designed to limit the intensification of new urban development in areas of greatest flood risk and establishes a flood evacuation strategy. We support the flood evacuation provisions in the DCP.
- b. Section 6.1, Control 3 of the DCP should be amended to read "... Figure 14 and must be *provided and* maintained as the precinct develops."
- c. Further clarification is required on the definition of 'Flood Hazard Area'. Given the unusual flooding conditions in the Hawkesbury-Nepean Valley, this needs to be done at a State agency level.

8.2 Built form controls

- a. Section 6.2 of the draft DCP goes further in outlining a series of built form controls in accordance with the NSW Government Floodplain Development Manual. In particular, it requires residential development located between the 1:100 yr ARI and the PMF to comply with the "Reducing Vulnerability of Buildings to Flood Damage – Guidance on Building in Flood Prone Areas" (Hawkesbury-Nepean Floodplain Management Strategy Steering Committee, June 2006), known as the 'Blue Book'.

- b. There are a number of important factors that need to be considered before finalising the DCP with the proposed built form controls, such as:
 - i. The additional cost of construction of new dwellings and the ordinary lifecycle cost of a dwelling and its materials and finishes. Consultation should occur with the development industry and home builders to understand the cost implications, and a cost benefit analysis undertaken that balances the risk, frequency and severity of flooding against cost of replacement, improvements and maintenance of a dwelling.
 - ii. Consistency across the NWGA. There are already existing rezoned Precincts where development activity has already occurred on land between the 1:100 yr and PMF and they have not been required to comply with these controls.
 - iii. Consistency with the development standards for flood control lots in State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 for a Complying Development Certificate. Do the proposed DCP controls require a higher standard of compliance on a Development Application than a Complying Development Certificate under the Codes SEPP?
 - iv. Consistency of requirements on other infrastructure assets to ensure they are also built with flood resilient construction, such as power poles and telecommunications lines. These should ideally be underground in all new residential urban environments.
 - v. The Department needs to educate and notify landowners and home builders about the final controls and the implications of developing between the 1:100 yr ARI and PMF, to ensure that everyone is aware of these requirements when preparing a Development Application.
 - vi. Include the specific controls in the DCP, either as an extract from the 'Blue Book' or attaching the relevant provisions to the DCP.
- c. We are willing to discuss these important matters with you before finalising the Precinct Plan.

9. Contributions Plan and community facilities infrastructure

We request that the final West Schofields Precinct Plan not be made until we have adopted a Contributions Plan that enables us to levy contributions for the local infrastructure identified in the plan. The reason for this request is as follows:

9.1 Minister's Direction from July 2017

- a. The Minister for Planning has announced that the Local Infrastructure Growth Scheme (LIGS) would no longer subsidise development past July 2020 and that the caps on Section 7.11 contributions would be phased out in "LIGS transition areas", with other areas of NSW retaining caps of either \$20,000 or \$30,000 per lot/dwelling. Further, IPART would continue to assess Contributions Plans that proposed a contribution above the caps and developers would now pay the full approved Section 7.11 contributions. The West Schofields Precinct is not identified as a LIGS transition area.
- b. We have advised the Minister, the Secretary and Department of Planning and Environment officers several times that the new Contributions Plans approval process outlined in the Minister's Direction created a problem for areas like West Schofields which are outside the LIGS transition area. To date, apart from the Department arranging a workshop to review the issue, we have received no resolution.

- c. The Minister's Direction, which is outlined below, sets out 5 criteria that must be satisfied before a council can impose a condition on a development consent for contributions to be paid for local infrastructure in accordance with its Contributions Plan:
1. *IPART has reviewed the contributions plan (or a draft of that plan) in accordance with the assessment criteria set out in any applicable practice note, including whether the facilities to which the contributions plan relates are on the essential works list set out in the practice note,*
 2. *IPART has published a report of its review on its website and forwarded it to the Minister for Planning,*
 3. *following the forwarding of the report to the Minister, the Minister (or a nominee of the Minister) has advised the relevant council as to any amendments required to the contributions plan,*
 4. *the Minister's (or nominee's) advice to the council has been published on the website of the Department of Planning and Environment,*
 5. *the relevant council has approved the plan, and has made any amendments to the plan, in accordance with the written advice of the Minister or the Minister's nominee.*

9.2 Rezoning and contributions plan process for previous precincts

- a. To date, precinct plans for each release area precinct in the NWGA have been made ahead of the Contributions Plan being approved by the Minister.
- b. Prior to the Minister's July 2017 Direction, we entered into Voluntary Planning Agreements (VPA) with developers to pay the capped contribution of \$30,000 per lot/dwelling, with the balance of the contribution funded through the LIGS when the Contributions Plan received endorsement from the Minister. This provided certainty for developers in terms of their contribution obligation.

9.3 Current situation

- a. The new contributions approval process removes the developer's certainty of its contributions obligations as it is unknown until a Contributions Plan is endorsed by the Minister. As such, they will be unwilling to enter into a VPA for an unknown amount.
- b. Of greater concern to us is that, under the new process, even if we could prepare a Contributions Plan to be exhibited concurrently with the Department's precinct plans, we cannot legally condition a developer for local infrastructure until we have adopted the Contributions Plan, which can't occur until we receive written endorsement from the Minister. This is likely to be up to 2 years from when the Precinct Plan is made, given the lengthy process involved in the process outlined above in the Minister's Direction.

9.4 Our unwillingness to accept Development Applications

- a. As we cannot condition a Development Consent for contributions, we are left with no choice but to refuse to accept Development Applications within unfunded precincts until the Contributions Plan is adopted in accordance with the Minister's Direction.
- b. Unless a solution is found we strongly request that the West Schofields Precinct Plan not be made or come into effect until we have adopted a Contributions Plan. Until this occurs, we will not be accepting any Development Applications within the West Schofields Precinct.

9.5 Unfunded Community Facilities

- a. We note that the precinct planning has identified that community facilities are essential for new communities to thrive and flourish. A community facility for West Schofields is as shown on the Department's Indicative Layout Plan. However, this is at odds with the Department's position that community facility buildings are not considered essential in terms of funding. The Department's Essential Works List only allows the acquisition of the land component of the facility. The accumulative effect of not funding this facility and other community facilities in the North West Growth Area for Blacktown City is around \$300 million.
- b. By leaving community facilities in West Schofields and other North West Growth Area precincts unfunded, the construction of new estates become unattractive and socially deficient. On this basis it is our strong view that land not be rezoned until the Government provides provisions for such infrastructure to be put in place.

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