

### Submission on Open Space within Ryde LGA and Macquarie Park Corridor

#### Planning Proposal PP-2024-1465 | 146-150 Vimiera Road, Marsfield 17 September 2024

This submission has been prepared following Resolution MM33/24 of City of Ryde Council on 27 August 2024 in respect of a purported 'need' for the land at 146-150 Vimiera Road, Marsfield (TG Millner Field) to be used for the purpose of public open space. This is despite the land being used as a private sporting facility, the functions of which are soon to relocate to Castle Hill. This memorandum summarises:

- Recent decisions of the NSW Department of Planning, Housing and Infrastructure (DPHI) and City of Ryde Council which demonstrate that there is no need or intention of government to acquire the land.
- Outlines how the existing and future open space needs of the community are readily able to be met within existing public landholdings in a cost-effective manner and without the need for acquisition of private land.
- Identifies that the acquisition and development of TG Millner Field for public playing fields would be in the order of 14 times more expensive than other projects identified in existing Council and DPHI strategies.
- Identifies additional opportunities for additional future open space provision on Council-owned land not identified in the existing strategies.

We request that this submission informs the assessment by Council officers of PP-2024-1465 and is read in conjunction with the Planning Proposal, including the Open Space and Recreation Need Assessment.

#### Summary

- The Sydney North Planning Panel determined in December 2022 that a Planning Proposal for 132 townhouses and 1ha of public open space should not proceed as the site may be required for public open space as part of Council and future NSW Government rezoning strategies, and stated that further discussions should occur between the Proponent, the NSW Government and Ryde Council.
- The Proponent has met with DPHI and the NSW Government on numerous occasions since the Panel's decision. DPHI confirmed through the release of the Macquarie Park Innovation Precinct Stage 1 and Stage 2 Rezoning Proposals that the land is not required to meet open space requirements for state-led rezoning.
- Council applied to the Minister for Local Government for permission to issue a Proposed Acquisition Notice to compulsorily acquire the land. Council were provided with several opportunities to demonstrate how it would fund the acquisition, however, Council failed to do so and nominated only minimal funding that fell well short of Council's own conservative valuation. Accordingly, Council's request was denied by the Minister for Local Government. Council's own strategies identify numerous more cost-effective options in which to meet the future open space needs of the community without acquiring private land.
- Specifically, the analysis set out in this paper demonstrates that there is capacity identified within DPHI and Council strategies to deliver the following active open space infrastructure, which is well in excess of projected needs:
  - 14 x new full-sized playing fields.
  - 7 x full-sized fields with improved public access through shared use agreements.
  - 7+ x existing playing fields upgraded to synthetic, significantly increasing capacity.
  - 15 x full-sized fields provided with new lighting, allowing increased capacity through evening usage.
- In addition, there is capacity for a further 8-13 additional playing fields not identified in these strategies to be developed on existing Council-owned land without the need to acquire private land.
- On this basis, there is no justification for the acquisition of private land to deliver open space within Ryde.
- This is particularly the case in this instance, where the redevelopment of the TG Millner Site will directly facilitate the delivery of 1ha of new public open space on the site and the delivery of 3 x full-sized playing fields at Castle Hill for the continued use of Eastwood Rugby and associated sporting organisations that currently utilise the TG Millner Field.

## 1.0 Background

In May 2022, North Ryde RSL and Eastwood Rugby Clubs (the Clubs) submitted a Planning Proposal to Ryde Council to rezone the privately-owned 6.2 hectare TG Millner site to facilitate a low-rise residential housing development of 132 townhouses together with the dedication of 1 hectare of public open space.

Council sought to prevent the Planning Proposal from proceeding by taking steps to compulsorily acquire the site. A Rezoning Review was commenced on the basis of Council's actions, and, in December 2022, the Sydney North District Planning Panel determined that the Planning Proposal should not proceed to a Gateway Determination for the following reasons:

The Panel is concerned that Council and State Government Strategies identify the need for increased residential development to be supported by increased services and infrastructure, including areas of open space in the Ryde LGA. It seems the targets for additional homes in Ryde LGA are being met (and likely to be exceeded), however, it is unclear how the targets for the provision of open space are to be met, including the identification of suitable sites and funding strategies.

The Panel understands that action plans to deliver the required open space are currently being prepared by State and Local Government. Within this strategic context, the site, as existing active open space (albeit privately owned), has the potential to contribute to the amount of open space needed to service the future population of Ryde LGA.

The Panel believes further discussions between the Proponent, Council and State Government could result in this site making a significant contribution to delivering public open space and housing strategies for the local and regional communities.

The Panel's decision was founded upon advice provided at the time by the NSW Department of Planning, Housing and Infrastructure (DPHI) and City of Ryde Council (Council) at that time that:

- 1. DPHI was in the process of preparing strategic + infrastructure plans for Macquarie Park that may need to consider the inclusion of TG Millner Field in these plans to ensure the achievement of future open space targets which would be unlikely to be finalised until late 2023.
- 2. In September 2022, Ryde Council initiated the process of seeking to compulsorily acquire TG Millner Field from the Clubs on the basis that the acquisition of TG Millner Field was required to ensure that Council's future open space targets were achieved.

Since the Panel's decision of 6 December 2022, the following has occurred:

- 1. DPHI has prepared and publicly exhibited its rezoning plans for Macquarie Park (in November 2023 and July 2024) which confirm that TG Millner Field is not required to achieve the future open space requirements for the Macquarie Park rezonings. DPHI's strategies identify alternative playing field and open space projects and funding mechanisms.
- 2. In April 2024, Ryde Council's request to compulsorily acquire TG Millner Field was refused by the NSW Minister for Local Government due to Council's lack of strategic justification for the proposed acquisition and its lack of financial capacity to acquire the site.

Accordingly, the prior reasons for not permitting the Planning Proposal to proceed to Gateway Determination have been superseded. Further details in respect of these decisions and policies is outlined below.

On 3 July 2024, the Clubs submitted to Ryde Council an identical Planning Proposal to that submitted in May 2022, given that the reasons cited by the Panel in refusing the initial Planning Proposal have been superseded by the intervening policy initiatives and strategic decisions of the DPHI and Minister for Local Government – which have considered in detail the future open space requirements of the Ryde LGA and TG Millner's role or otherwise in these plans.

## 2.0 Open Space Policy – NSW Government and City of Ryde

#### 2.1 Policy Framework

Subsequent to the decision of the Planning Panel in December 2022, the NSW Department of Planning, Housing and Infrastructure (DPHI) released the following planning packages:

- 1. **Macquarie Park Innovation Precinct Stage 1 Rezoning Proposal**, which was released for public comment in November 2023 and is currently being finalised by DPHI. This planning package is accompanied by and informed by a number of studies, including an Infrastructure Delivery Plan that identifies proposals to fund and deliver the open space needed to service the future population growth envisaged by this planning package.
- 2. Macquarie Park Transport Oriented Development Rezoning Proposal (Stage 2 Rezoning Proposal), which was released for public comment in July 2024. This planning package is also accompanied by and informed by a number of studies, including an Infrastructure Delivery Plan that identifies proposals to fund and deliver the open space needed to service the future population growth envisaged by this planning package.

At the time that the Planning Panel made its decision, Council relied on the following existing policy position:

3. **Open Space Future Provision Strategy (OSFPS)**, adopted in May 2021, which sets out Council's approach to the provision of open space to meet general population growth within the City of Ryde.

Subsequent to the Planning Panel's decision, Ryde Council adopted the following further policy:

4. **Sports Field Action Plan – Towards 2036 (SFAP)**, adopted by Council in June 2023 (after the Planning Panel's decision) and described by Council as "an Action Plan for meeting the 2036 population demand for full size fields utilised for active recreation". The SFAP seeks to further refine Council's OSFPS.

Together, these four (4) documents set out how additional open space capacity is proposed to be delivered to support the future needs of the community. Reference has also been made by Council to the NSROC *Regional Sportsground Strategy Review 2017* document which is not a relevant or adopted planning policy.

These documents clearly demonstrate that there is ample capacity to deliver open space without any requirement for new playing fields at TG Millner Field. As outlined in **Annexure A**, these strategies identify the provision of the following facilities on publicly-owned land:

- 14 x new full-sized playing fields
- 7 x full-sized fields with improved public access through shared use agreements
- 7+ x existing full-sized playing fields upgraded from grass to synthetic, providing additional capacity through enhanced durability and wet weather use.
- 15 x full-sized fields provided with new lighting, allowing for additional capacity through evening usage.

#### 2.2 Macquarie Park Stage 1 and 2 Rezoning Proposals (DPHI)

The NSW Government Stage 1 and 2 Rezoning Proposals for Macquarie Park policies make no reference to TG Millner Field and instead identify a series of projects that would be funded and delivered through the Rezoning Proposals to meet the projected future demand arising from new dwellings within the Macquarie Park Corridor.

#### 2.3 Open Space Future Provision Strategy (Council)

The relevance of the status and recommendations of the OSFPS are comprehensively addressed in our Planning Proposal documentation. In brief, the OSFPS identifies a range of options to provide additional playing field capacity, with the total potential capacity identified significantly exceeding the forecast demand, and making no cost-benefit analysis of each of the options identified. Importantly, the OSFPS makes clear that Council can readily address projected future playing field demand on existing Council-owned land as follows:

• currently Council-planned projects will reduce the forecast 2036 facility gap or shortfall from 13 to 7 facilities and the OSFPS provides details of Council's proposed works in this regard.

- three existing sites (Gannan Park, Waterloo Park and Darvall Park) which have the potential to provide an additional 3 full-size fields, thereby reducing the anticipated 2036 shortfall from 7 to 4 facilities.
- makes clear that synthetic existing field conversions, lighting upgrades, a new turf field and new synthetic field (on Government or privately-owned land) that would close the forecast supply gap from 4 fields to zero by 2036.
- ranks the potential opportunities and identifies Government land opportunities at Epping Boys High School (2 x full-size fields), the 7 hectare CSIRO site in Marsfield (at least 2 x full-size fields) and an upgrade at Darvall Park (1 x full-size field) as its priority opportunities.

The OSFPS does not:

- refer to the circa 12 hectare surplus land owned by Council at 152-162 Wicks Road, Macquarie Park which Council has separately identified as having the potential for sporting fields (refer **Annexure B**).
- identify the acquisition of TG Millner Field as being required to address its 2036 supply gap a point recognised by the Minister for Local Government in rejecting Council's compulsory acquisition request.

#### 2.4 Sports Field Action Plan (Council)

In June 2023 Council adopted the *City of Ryde Sports Field Action Plan – Towards 2036* (SFAP), which is described as an implementation plan for the upgrade/expansion of the City's Facilities to meet the 2036 population demand outlined by the OSFPS. The Ryde Council SFAP assesses the cost-effectiveness of the priority projects in the OSFPS and additional opportunities arising through potential enhancements to lighting and field quality.

The SFAP identifies four existing playing fields (Bremner Park, Smalls Rd School, Westminster Park and Waterloo Park) as priorities where synthetic conversion and lighting upgrades have the capacity to deliver 154 hours of additional capacity per week, at an average cost of \$168,058/hour gained.

For non-synthetic options, the SFAP identifies 7 sports field lighting projects, 4 field reconfiguration projects and a NSW Education shared use agreement project as having the capacity to deliver 294 hours of additional capacity per week, at an average cost of \$34,974/hour gained.

Together, these projects on Council-owned land deliver 448 hours of additional playing capacity for a total cost of \$36 million, at an average of \$80,721 per additional hour of capacity per week.

The SFAP identifies two 'rezoning opportunities' for land not owned by Council, being the CSIRO and TG Millner Field sites, which are to deliver 2 fields each at no cost to Council to deliver a total of 120 additional hours of capacity per week. Whilst this might be a reasonable assumption for the CSIRO land, which is owned by the Australian Government, it is not reasonable of feasible for the TG Millner site which is private land.

Adopting the 'cost per user hour' methodology applied by Council and applying this to the (below-market) \$28M offer made by Council to acquire TG Millner Field in October 2022, the cost per user hour would be \$466,667/hour gained – being nearly **6 times the cost of Council's other projects** – not accounting for the additional capital works required to make the fields suitable for public use.

Assuming a still conservative purchase price of \$55M for TG Millner Field (halfway between the Council offer and the Clubs' position) and allowing \$15 million in capital works to bring both fields and associated facilities to a standard suitable for public use, this would equate to \$1.17 million per additional hour – **14 times the average cost of Council's other projects**. Refer to **Figure 1**.

Noting that each of Council's other identified options for playing field capacity deliver significantly greater valuefor-money to ratepayers and the community, and that there continues to be additional further opportunities to deliver playing fields more cost-effectively on government owned land (refer **Section 3.2**), it would not be responsible for Council to continue to advocate for the acquisition of the TG Millner Field.

Project Type	Park/location	Project	2022 Cost	Additional play hrs/w		eek	Cost (\$)
			Est (\$) <sup>29</sup>	Gross	Weighting	Net	per net hr/week gained
Rezoning opportunity	New fields at TG Millner site <sup>30</sup>	Minimum 2 new turf fields	<del></del> *	60	1.0	60	0
Rezoning opportunity	CSIRO Marsfield	2 new turf fields	0	60	1.0	60	0
New shared use natural turf	Shared use of Epping Boys High fields	2 new turf fields	400,000	60	1.0	60	6,667
Sports field lighting	Bill Mitchell Park	F/S field x 1	200,000	12	0.5	6	33,333
Sports field lighting	Dunbar Park	F/S field x 1	200,000	12	0.5	6	33,333
Sports field lighting	Morrison Bay 3	F/S field x 1	200,000	12	0.5	6	33,333
Sports field lighting	Morrison Bay 6	F/S field x 1	200,000	12	0.5	6	33,333
Sports field lighting	Peel Park	F/S field x 1	200,000	12	0.5	6	33,333
Sports field lighting	Pioneer Park	F/S field x 1	200,000	12	0.5	6	33,333
Sports field lighting	Santa Rosa 1	F/S field x 1	200,000	12	0.5	6	33,333
Field layout reconfiguration	Meadowbank Park – stage 3 (fields 7 & 8-netball courts conversion)	New F/S (2) + sports field lighting	3,885,926	60	1.0	60	64,765
Field layout reconfiguration	Meadowbank Park – stage 9 (fields 9, 10, 11, 12)	New F/S x 1 + sports field lighting	1,796,252	30	1.0	30	59,875
Field layout reconfiguration	Gannan Park- stage 1	New F/S (1) + sports field lighting	2,641,547	30	1.0	30	88,052
Field layout reconfiguration	Gannan Park- stage 2	New F/S (1)- with loss of 1 Jun	158,493	30	1.0	30	5,283
		TOTAL	10,282,218	414	11	372	27,640

Figure 1 Excerpt of SFAP 'Priority Projects' excluding synthetic field conversions

Source: City of Ryde Sports Field Action Plan, annotated by Ethos Urban

## 3.0 Planned Funding and Delivery of Open Space

#### 3.1 Planned Local Open Space

**Annexure A** sets out each of the full-sized playing field projects that will be delivered under the DPHI strategies, the priorities identified under the OSFPS and SFAP. The summary focuses on full-sized playing fields given the relevance of this point for TG Millner Field, together with the fact that the OSFPS does not identify significant long-term shortfalls in terms of the 'Junior/Mod Field/Oval', 'Indoor Court' or 'Outdoor Court' categories. It is noted however that

In summary, these projects involve:

- 14 x new full-sized playing fields on Government-owned land
- 7 x full-sized fields with improved public access through shared use agreements
- >7 x existing full-sized playing fields upgraded from grass to synthetic
- 15 x full-sized fields provided with new lighting, allowing evening usage.

This list excludes a wide range of additional and enhanced indoor and small-sided fields/courts that also deliver significant additional sporting infrastructure capacity to meet the needs of the local community.

It is important to note that the DPHI Rezoning Proposals for Macquarie Park provide for the achievement of future open space objectives within the context of these Proposals, while the Council OSFPS and SFAP make provision for a lower level of growth across the balance of the Ryde LGA. Together, these projects demonstrably exceed the demand projected by DPHI and Council for playing field infrastructure arising from future population growth.

#### 3.2 Additional Open Space Opportunities

The proponent has identified a number of opportunities not identified in **Section 3.1** to deliver additional playing field capacity on existing government-owned land as identified in **Annexure B**. This includes the Council-owned land at 152-162 Wicks Road, North Ryde which has the future capacity to deliver 6-8 full-sized playing fields. This land has not been identified in Council's recreation facility planning despite being within Council ownership and having significant capacity to contribute to future open space needs for the community in a significantly more cost-effective manner than acquisition of private landholdings. Opportunities such as those identified in **Annexure B** demonstrate that there is ample opportunity for Council to continue to deliver significant additional land for open space in a significantly more cost-effective manner than Council's proposal to acquire TG Millner.

#### 3.3 Replacement and enhancement of existing private regional sporting functions

As outlined in previous reports and correspondence, the redevelopment of the private landholding at TG Millner Field will facilitate the investment in purpose-built facilities in a new Centre of Excellence for Rugby at Fred Caterson Reserve, Castle Hill. The Centre of Excellence will deliver modern, fit-for-purpose facilities for Eastwood Rugby that include:

- Three full-size rectangular playing fields, including two synthetic fields and one natural turf field, with 24 houraccess and full usage control by Eastwood Rugby.
- Broadcast-quality lighting to enable night games and later training.
- Professional level gym and supporting infrastructure for players.
- Equal facilities for men and women to provide equitable support and assist in growing the women's game.
- Outstanding game day experience with clean and modern facilities for supporters.
- Adequate on-site parking to meet projected demand from the facility's usage.

The new facility is located within the geographic heart of Eastwood Rugby's existing and fast-growing membership base, providing a secure platform to ensure the Club's ongoing financial viability.

Eastwood Rugby has committed on numerous occasions that the small number of existing external users of TG Millner Field will have access to the new facility at Castle Hill, located less than 20 minutes away and closer to many of these existing users than the current site.

Accordingly, the project will facilitate an increase in regional open space provision in both quantitative and qualitative terms that would not otherwise be achievable without redevelopment of the TG Millner site.



Figure 2Indicative site plan of new Eastwood Rugby facility at Fred Caterson Reserve, Castle HillSource: Populous



 Figure 3
 Indicative render of new Eastwood Rugby facility at Fred Caterson Reserve, Castle Hill

 Source: Populous

## 4.0 Conclusion

This submission demonstrates that since the Planning Panel's decision of December 2022:

- The NSW Government has determined that the planned growth within the Macquarie Park Corridor can be supported with new open space infrastructure within the Ryde LGA that is not reliant upon TG Millner Field;
- City of Ryde Council's adopted *Sports Field Action Plan Towards 2036* identifies a range of projects able to be delivered on government-owned land that significantly exceed the open space capacity required to support other planned growth across the Ryde LGA without the need to acquire private land;
- City of Ryde Council has demonstrated that it is not prepared to fund acquisition of the TG Millner Field site, and due to other financial constraints cannot responsibly allocate funding for projects that demonstrably fail cost-benefit analysis;
- In this regard, conservative estimates of the cost to Council to purchase the TG Millner Field site would make this project 14 times more expensive per added hour of capacity than Council's other identified open space projects;
- There continues to be a range of other suitable future opportunities to provide additional playing fields beyond those identified in Council's strategies on land owned by Council and government, which should be prioritised ahead of any private land acquisition on both financial and governance grounds;
- The proposed redevelopment of the privately-owned land makes a very significant contribution to both local open space provision and regional sporting infrastructure, at no cost to Council;
- All existing sporting users of the TG Millner Field will be accommodated at new purpose-built facilities funded by the project, and accordingly there will be no impact on sporting infrastructure availability.

For these reasons, we request that Council recommend PP-2024-1465 proceed to Gateway Determination as soon as possible in order to secure the public benefits proposed to be delivered through this project.

# Annexure A: DPHI and Council Playing Field Projects

Full Size Field/Oval							
Project	Description	Plan that identifies the project	Funding	Timing	Project Status		
Christie Park	1 x New Full Size Synthetic Field/Oval	<ul> <li>OSFPS</li> <li>DPHI Stage 1</li> </ul>	Local Government	0-12 years	Planned		
Land east of Christie Park	1 x New Full Size Field/Oval	<ul> <li>OSFPS</li> <li>DPHI Stage 2</li> </ul>	No funding identified	No timing identified	Potential Future		
144 Wicks Road	1 x New Full Size Fields/Ovals Renewal of existing hockey field	<ul> <li>DPHI Stage 1</li> <li>DPHI Stage 2</li> </ul>	General NSW Government funding / State grants	No timing identified	Potential Future		
CSIRO Marsfield	2 x New Full Size Fields/Ovals	• OSFPS	No funding identified	No timing identified	Potential Future		
Darvall Park	Replace 1x Junior/Mod Field/Oval with1x Full Size Field/Oval	<ul> <li>OSFPS</li> <li>DPHI Stage 1</li> <li>DPHI Stage 2</li> </ul>	Local Government	0-5 years	Potential Future		
Epping Boys High School	Shared use for public access to 2 x Full Size Fields/Ovals	OSFPS	No funding identified	No timing identified	Potential Future		
Gannan Park	1 x Full Size Field/Oval	OSFPS	No funding identified	No timing identified	Planned		
Gannan Park	Replace 1x Junior/Mod Field with 1 x Full Size Field/Oval	OSFPS	No funding identified	No timing identified	Potential Future		
Macquarie University	Expand current shared use agreement with Macquarie University for public use of university sports facilities, including 5x Full Size Field/Oval	<ul> <li>OSFPS</li> <li>DPHI Stage 1</li> <li>DPHI Stage 2</li> </ul>	No funding identified	No timing identified	Potential Future		
Magdala Park	1 x New Full Size Field/Oval 1 x synthetic surface upgrade	<ul> <li>OSFPS/ SFAP</li> <li>DPHI Stage 1</li> <li>DPHI Stage 2</li> </ul>	Local Government	0-5 years	Planned		
Meadowbank Park Stages 3 & 9	3 x New Full Size Fields/Ovals	OSFPS	Local Government	No timing identified	Planned		
Marsfield Park	Synthetic conversion of existing 2 x Full Size Fields/Ovals	<ul> <li>DPHI Stage 1</li> <li>DPHI Stage 2</li> </ul>	Local Government	0-5 years	Planned		
Pidding Park	1 x New Full Size Field/Oval	<ul> <li>OSFPS</li> <li>DPHI Stage 1</li> <li>DPHI Stage 2</li> </ul>	Local Government	0-5 years	Planned		

Full Size Field/Oval						
Project	Description	Plan that identifies the project	Funding	Timing	Project Status	
Waterloo Park	1 x New Full Size Field/Oval Upgrade surface of existing field to synthetic	<ul> <li>OSFPS</li> <li>DPHI Stage 1</li> <li>DPHI Stage 2</li> </ul>	Local Government	0-5 years	Potential Future	
TG Milner Fields	2 x Full Size Fields	OSFPS	No funding identified	No timing identified	Potential Future	
Sports Field Lighting	Upgrade Sports Field Lighting for 15 x Full Size Field/Ovals	OSFPS	No funding identified	No timing identified	Planned	
Synthetic Conversions	Upgrade 5 or 6 Full Size Fields/Ovals to synthetic (inconsistent in document)	OSFPS	No funding identified	No timing identified	Potential Future	
North Ryde Park	Upgrade playing surface from turf to synthetic	<ul> <li>DPHI Stage 1</li> <li>DPHI Stage 2</li> </ul>	Local Government	0-5 years	Planned	
Meadowbank Park	Upgrade turf to synthetic at LH Waud Oval	OSFPS	No funding identified	No timing identified	Planned	
Smalls Road Upper (school)	Upgrade turf to synthetic	OSFPS	No funding identified	No timing identified	Planned	

## Annexure B: Additional Playing Field Opportunities on Existing Public Land

The following is a list of Additional Field Opportunities that do not form part of the Macquarie Park Rezoning Proposals, nor are they included in Council's OSFPS or SFAP.

Of particular interest is the land owned by Council at 152-162 Wicks Road, Macquarie Park. Council has previously indicated that this circa 12 hectare site (double the size of TG Millner and owned by Council) has the potential for sporting fields but has not seen fit to include the site in its OSFPS or SFAP, nor has it made the site available to the State Government for its consideration in preparing the Rezoning Proposals for Macquarie Park.

Additional Field Opportunities						
Project	Description	Plan that identifies the project	Funding	Timing	Project Status	
152-162 Wicks Road, North Ryde	6-8 x Full Sized Fields	N/A	Existing Council Land	N/A	N/A	
North Ryde Common	2-4 Full Size Fields	N/A	Existing NSW Government Land			
Ryde Park	Replace 1 x Junior/Mod Field with 1 x Full Size Field/Oval	N/A	Existing Council Land, potential acquisition of 1 x residential property			
Shared Use	Additional shared use agreements/co-development of new/enhanced facilities with NSW Department of Education, Macquarie University, independent schools	N/A	Existing Government Land			