



Gawler Environment and Heritage Association Inc,
C/- 42 Finnis Street Gawler SA 5118



4 April 2008

Mr Richard Osborne
General Manager SA
Delfin Lend Lease
1 Main Street
Mawson Lakes SA 5106

cc
Ms Maria Atkinson
Lend Lease Global Head of Sustainability

Ms Julie Hill
Chair Sustainability Committee Lend Lease

Dear Mr Osborne

**Proposed Development Site at Gawler East
Gawler Environment and Heritage Association (LandCare Group) Concerns**

GEHA is aware that Delfin Lend Lease has obtained an interest in rural land in Gawler East and is developing plans for that land for residential and commercial development if it is rezoned. Local residents are also aware of Delfin Lend Lease's interest through information in the local media. Two GEHA representatives have also had discussions with your company recently on matters related to Gawler East and the South Para.

Background to GEHA Position on Urban Growth Boundary Extension

Since the South Australian Planning Minister, Paul Holloway, announced an intention in July 2007 to extend the Urban Growth Boundary to include additional land at Gawler East, Gawler Environment and Heritage Association has expressed concerns about various matters including the following:

1. The increasing strain on local infrastructure, in particular roads and bridges, which are already struggling to meet the needs of the current population of 20,000, already targeted to reach 30,000 in a few years.
2. The clear threat to Gawler's identity as a separate and unique town of heritage significance.
3. The lack of evidence and studies to support a position that continuing with perimeter urban growth (sprawl) so far from Adelaide is either sustainable or sensible. (State strategic planning goals of reducing both ecological footprint and greenhouse gas emissions seem to be heading in a different direction).

4. Inadequacies in the manner in which public consultation has been and continues to be conducted, particularly with consultation based on inadequate information.

So far, the concerns we have raised with the Minister have not been resolved. For your information, we have attached to this letter a copy of our submission to the Minister for Development and Urban Planning dated 5 September 2007, which details these matters. As Delfin Lend Lease has been reported as being the probable developer of the site, we would now also look to Lend Lease to respond on these issues.

Further, Gawler Environment and Heritage Association has particular concerns about Lend Lease's intentions for the Gawler East site and we would appreciate a response to the questions raised below as soon as possible.

Concerns about Lend Lease development at Gawler East

Our main concerns with Lend Lease's proposed development include:

1. The overwhelming reliance by new residents on motor vehicle transport and the detrimental effect that additional vehicle movements will cause on already strained (19th Century) infrastructure in our heritage town.
2. Protecting biodiversity in a regional context, including on this site - assessment of remnant vegetation and dependent fauna; the need to maintain the natural creeklines of the various watercourses; protection of natural springs which are already threatened by a range of factors and the complexities involved on such a hilly site, in particular, how to manage stormwater to assist with environmental flows in the creeks and the South Para. In talking of a regional context, GEHA is referring to the Commonwealth and State assessment that the Mount Lofty Ranges region is identified as a biodiversity hotspot and an area of high extinction potential for many species of plants and animals and is in need of substantial action to avoid impending extinctions.
3. The impact of an alternate commercial centre which may have adverse impacts on the commercial viability of the historic town centre and existing trade and creation of significant traffic flows in and through Gawler.
4. Whether Lend Lease can ensure a much better level of sustainable housing compared with most recent examples of housing in metro Adelaide including areas such as Mawson Lakes and Golden Grove developed over recent years by Delfin. Issues of water and energy use have been highlighted by our recent extreme heatwave conditions and climate change predictions. Issues of low impact development, waste, recycling, better transport options and the like are also concerns in the Gawler East area.
5. Protection of heritage values, tourism assets and social cohesion around the existing Gawler culture of 'the Best of Town and Country' given the emphasis of much Greenfield development of selling the features of the new areas, often to the detriment of adjacent areas.

Within each of these areas of key concern we have further detailed questions as follows:

1. Excessive Motor Vehicles Movements

GEHA understands the current level for the traffic volume in Murray Street (historic main street) is over 22,000 vehicles a day. We expect that Lend Lease's development would increase this 50% or more. Even with alternate by-passes there is certain to be major traffic increases in the town centre of Gawler because of the nature of road connections and the lack of alternatives to cars.

Given that Gawler's roads and bridges are already often at capacity for many hours a day, and cross-town vehicle movements are constrained by the town's topography, (at the confluence of the North and South Paras):

Q 1.1 How will Lend Lease ensure that traffic generated to and from the site will not cause vehicle movements to reach gridlock proportions in Gawler?

Q 1.2 What protection will be afforded to residents of neighbouring streets as drivers seek out relief from congested arterial roads?

2. Protection of biodiversity, natural creeklines and environmental flows

Lend Lease's 2005 Sustainability Report specifically recognizes that Lend Lease projects have the potential to significantly impact the environment, including 'disturbance of biodiversity'. (p36) In the development of Lend Lease's UK Bluewater Retail Centre respect for 'local fauna and flora' was considered paramount (p54).

Q 2.1 What independent analysis has been made at Gawler East of vegetation and fauna in the context of local and regional biodiversity issues?

Lend Lease's environment policy states that "compliance with legislation, regulations and other requirements is a minimum and we will apply global best practice and innovations where legislation does not exist".

([http://www.lendlease.com.au/llweb/llc/main.nsf/images/pdf_corpgov_enviropolicy.pdf/\\$file/pdf_corpgov_enviropolicy.pdf](http://www.lendlease.com.au/llweb/llc/main.nsf/images/pdf_corpgov_enviropolicy.pdf/$file/pdf_corpgov_enviropolicy.pdf))

Q 2.2 What legislative regimes does Lend Lease believe are applicable to biodiversity protection, creekline and spring maintenance, and environmental flows on this site?

Q 2.3 Has Lend Lease investigated the requirements of the Environmental Protection and Biodiversity Conservation Act for grasslands in this area and threatened species?

Q 2.4 Would someone who is trained in EPBC and threatened species assessment be welcome to evaluate the area?

Q. 2.5 Apart from specific legislative regimes applicable to Gawler East, what 'global best practice and innovation' will Lend Lease apply to protect biodiversity, maintain natural creeklines and springs and ensure environmental flows?

Q 2.6 How does Lend Lease intend to protect or enhance the existing creeklines, springs and creek/river corridors across the site? How does Lend Lease intend to protect or enhance environmental flows in the South Para? What assessment has been made of hydrological conditions to assess impacts on groundwater feeding natural springs in the creeks and rivers?

Q 2.7 What assessment has been made regarding the current runoff from the Gawler East site and through the site from adjoining areas?

Q 2.8 Given the very steep slopes on much of the area, what assessment has been made of erosion issues both during development and after development?

We understand that there is a 25-30% open space component to the Mawson Lakes and Golden Grove developments.

Q 2.9 Is Lend Lease looking at a similar open space figure at Gawler East?

Q 2.10 What action does Lend Lease intend to take to protect and enhance the significant areas of remnant grassland/grassy woodland in the area. In addition to setting aside areas as “open space” what additional measures does Lend Lease intend to take to reduce impacts from new development in order to protect/enhance the conservation value of such areas and assist regional biodiversity goals?

3. An alternative commercial centre which competes with existing town centre activities.

The existing historic town centre of Gawler incorporates a balance of commercial, community and recreational activities, while most residential areas of Gawler East are peaceful and enjoy low traffic volumes.

Q 3.1 How is a commercial centre at Gawler East envisaged to integrate with/complement the existing town centre?

Q 3.2 What will be the size and scale of activities?

Q 3.3 What level of additional traffic would be brought to the Gawler East roads (including back streets) by a new commercial centre?

4. Urgent need for sustainable housing in South Australia

As already indicated, Lend Lease’s environment policy states that “compliance with legislation, regulations and other requirements is a minimum and we will apply global best practice and innovations where legislation does not exist”.

Q 4.1 What does Lend Lease consider to be ‘global best practice’ in relation to energy neutral development and will Lend Lease propose to implement this at Gawler East?

Q 4.2 How will Lend Lease realize its goal of achieving ‘leadership in sustainable environmental practice’ at the Gawler East site and how will this be achieved’?

We understand that Lend Lease is delivering a large solar-powered community in Hawaii.

Q 4.3 What work has Lend Lease done in assessing the viability of solar power generation in Gawler East?

Lend Lease Corporation’s Carbon Disclosure Project 5 Response (‘Lend Lease CDPR’) p3 states that, “Lend Lease recognizes the contribution to greenhouse gas emissions that buildings make and the need to future proof the built environment for the risks presented by climate change.” Given recent record high temperatures in the South Australian autumn and projected increases in temperature across SA:

Q 4.4 How will Lend Lease ‘future proof’ a Gawler East development from extreme heatwave and climate change conditions?

The Lend Lease CDPR quotes the Intergovernmental Panel on Climate Change WG3 on the technologies and practices that need to be applied to combat climate change. Those practices which are said to be relevant to Lend Lease’s business are: ‘efficient lighting and daylighting, more efficient electrical appliances and heating and cooling solutions, improved building insulation, passive and active solar design for heating and cooling and alternative energy generation’.

Q 4.5 Which of these Lend Lease-quoted, IPCC-recommended technologies does Lend Lease intend to implement, mandate or ensure in the development at Gawler East?

Q 4.6 Given record high temperatures in South Australia, has Lend Lease considered the impact of increasingly higher temperatures in SA on the saleability of housing lots in Gawler East?

Q 4.7 Has Lend Lease considered that increased saleability may result from the sale of energy efficient homes as consumers seek out the security and peace of mind which comes through purchasing sustainable housing?

Q 4.8 As water becomes scarcer and peak loads strain existing energy infrastructure what will Lend Lease require to ensure housing and commercial development that is water and energy self-sufficient?

We note that Lend Lease has been involved in a number of Green building initiatives and is proud of the fact that The Bond building in Sydney has exceeded its design greenhouse gas emissions target of 30% less greenhouse gas emissions than the average office building in Australia.

Q 4.9 What target does Lend Lease have for fewer greenhouse gas emissions (compared to other new homes) for buildings and homes in residential communities and commercial development?

Q 4.10 Will homes and commercial premises in the Gawler East development produce fewer greenhouse gas emissions than average new Australian homes and commercial premises, and if so, how?

5. Protection of Heritage Assets and Social Capital

One of the effects of major development can be to diminish the existing assets of the town in which that development occurs.

Q 5.1 What will Lend Lease do to protect Gawler's heritage values and the social cohesion built around the existing Gawler culture of 'the best of Town and Country'?

Q 5.2 What range of block sizes and living options does Lend Lease intend to offer at Gawler East? For example, could land be set aside for community cooperatives and eco village living, with community title and common areas?

Q5.3 What plans does Lend Lease have for public consultation and ensuring transparency in the process of developing Gawler East?

Dow Jones Sustainability Index

We understand that Lend Lease is listed on the Dow Jones Sustainability Index. Lend Lease is therefore aware of the importance many investors in sustainable businesses place on greenhouse gas emissions abatement, protection of biodiversity, water and energy conservation and protection of heritage, social capital and local business viability.

The Gawler Environment and Heritage Association has similar interests in protecting the environmental, social and economic strengths of Gawler and the region. We look forward to hearing your responses to the questions raised.

Yours Sincerely

Julie Stevens, Convenor
Gawler Environment and Heritage Association
<http://gehanews.wordpress.com>