



8 December 2022

Amanda Richman
Australian Ethical
Sent via email

Dear Amanda,

We acknowledge receipt of Australian Ethical's "Ethical Assessment of Lendlease's Mount Gilead development".

We do not accept your position that "Lendlease is developing a site that has the potential for significant adverse impacts for the local koala population". Based on the proposal shared with you and currently on public exhibition, there is no evidence to support this claim.

Lendlease is proudly at the forefront of delivering sustainable outcomes. Our purpose as an organisation centres on forming vibrant and enduring communities that contribute to a more liveable and sustainable future. The actions we take are driven by an understanding that every decision we make has an impact and must be made in collaboration.

We've been committed to the creation of independently rated green certified buildings, precincts and climate resilient communities long before it became industry practice, and we're continuing to work with our customers, investors and communities to make the places we create among the most sustainable in the world.

In response to your letter:

1. Lendlease is committed to following the only pathway, as outlined by the independent expert advice of the Office of the Chief Scientist, to contribute to increasing local koala numbers. In providing the advice, the panel of independent academics reviewed a comprehensive list of reports, documents and relevant research data. They have provided specific comments on our initial plan at Gilead which we have now updated to ensure that it meets and exceeds all recommendations and principles for koala protection. Further information on the Department of Planning and Environment's koala corridor mapping and methodology can be found in the attached letter dated 24 November 2022.
2. Continuing the status quo on this site remains a risk to the koala population because:
 - The east-west corridors are not functional today across the Gilead site because there is fencing which blocks connectivity.
 - Agricultural land use has caused loss and fragmentation of habitat. Livestock and exotic weeds continue to degrade the remaining habitat.



- The main causes of mortality to the local population are vehicle strikes and dog attacks, which will continue to occur if mitigation measures aren't introduced.

3. Lendlease absolutely understands and accepts the importance of being accountable and demonstrating the positive impacts our project will have on the koala population over time. We have relied on the independent and expert advice to guide our conservation efforts, and that discipline doesn't stop at the planning stage.

The Chief Scientist's report said, *"An adaptive management approach is identified as crucial, with consideration of data collection and monitoring requirements, to ensure and demonstrate the effectiveness of mitigation strategies"*.

We are building upon our annual surveys to deploy technologies to continuously monitor koalas and provide insights into genetic diversity, and the number and location of koalas and their movements at Gilead. Through research, expert advice and our science-based approach we will be able to demonstrate the positive impacts. We will put in place adaptive measures to protect the koala population and encourage new and safe frequency of koala movement.

In our view, Australian Ethical's requirements for Lendlease, as outlined in the "Ethical Assessment", do not appear to be informed by the advice of the Chief Scientist's independent panel of koala experts. We have provided detailed responses, which can be found attached to this letter.

We remain steadfast that we are adhering to the independent and expert advice of the NSW Chief Scientist and Engineer for koala conservation, which will significantly improve outcomes for Campbelltown's koalas.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Ranisha Clarke".

Ranisha Clarke
Chief Operating Officer Communities
Lendlease



Attachment

Lendlease response to Australian Ethical requirements:

The Chief Scientists' independent panel of koala experts have provided their advice for koala conservation at Gilead, based on their field experience, academic qualifications, and knowledge of relevant research. They have made recommendations that will improve outcomes for local koalas if implemented and we have committed to do exactly that and more.

This approach has also been endorsed by koala species expert Dr Steven Ward, who has helped us apply the recommendations of the Chief Scientist's advice to our plans.

The Chief Scientist's panel of independent experts reviewed a wide array of published research relating to koala conservation in general and specific research and policy relating to the Campbelltown colony. Not all of the research draws exactly the same conclusions or recommendations, that's why the Chief Scientist sought to publish – based on expert advice – a consolidated and definitive recommendation to guide development at Gilead.

The purpose of the Chief Scientist's advice was to provide a road map to follow so that the net impacts would be positive. And that's our commitment.

It's therefore not reasonable, in our view, to be selective with the Chief Scientist's advice and insist on other sources of research, because:

- All other relevant research was considered by the panel of independent koala experts; and
- One fact lifted from an alternate research paper is without context. For example, the Australian Ethical recommendations cite a 250m minimum corridor width but the Chief Scientist does not. The Chief Scientist recommends an average of 390m width but the report that the 250m minimum is derived cites a 350m average width and also cites the need for less corridors (only one of a substantive width) and only relates to corridors in Campbelltown. By insisting on some conservation measures and not others, Australian Ethical appears to be determining an alternate conclusion to the experts in this field.

In response to the Summary requests made by Australian Ethical listed point 5 (a) (b) and (c):

a) Lendlease's contributions to the two east-west koala corridors at Gilead, as well as the Nepean River corridor, will help deliver the first conservation corridors for koalas in Campbelltown.

The Chief Scientist's advice does not recommend a minimum corridor width. Following the April 2020 report, the Department of Planning and Environment (DPE) sought guidance and clarification from the Chief Scientist several times. At no stage did the Chief Scientist make recommendations – explicit or otherwise – on minimum corridor widths.

The koala corridors have been mapped by the DPE at a regional scale, and these maps are published on the DPE's website. As the corridors at Gilead traverse both government and privately owned land, including the Lendlease project site, we cannot provide new or extra transparency for the methodology of calculations of the corridors. We refer you to the letter by the DPE that clearly explains its methodology.

Our contribution to the Gilead corridors adheres to the maps published by the DPE; the DPE has confirmed that corridors to which Lendlease makes a conservation contribution are an average width of at least 390m. This meets the advice of the Chief Scientist.



Our proposal will make the Menangle Creek connection to the Nepean River functional. There are no extra or alternative corridors recommended by the Chief Scientist for the Gilead Stage 2 site.

b). We can and have demonstrated that core koala habitat will increase at Gilead by 70ha or 30% compared to what's there today. There is no scientific or public policy definition of 'territory' in the Chief Scientist's advice or recommendation in that regard. Therefore, this is a standard that Australian Ethical is referencing for which there is no scientific or public policy imperative. The focus is on quality habitat in strategic linkages protected by infrastructure investment (fencing and underpasses).

c). Bio-banks and stewardship agreements provide statutory protections on title with associated funding for management over time – they provide the highest level of land use protections and conservation outcomes possible on private land.

Mr Brendan O'Brien
Head of Strategic Planning, Residential Communities
Lendlease
Level 14, Tower Three, International Towers
Exchange Place, 300 Barangaroo Avenue,
Barangaroo NSW 2000

Via email: brendan.x.obrien@lendlease.com

24 November 2022

Subject: Gilead Stage 2 Planning Proposal.

Dear Mr O'Brien

Thank you for your recent email to the Department in relation to koala corridors for the Gilead Stage 2 Planning Proposal. I understand Lendlease is aware there is some confusion in the community, in particular regarding the koala corridor methodology, and that further clarification from the Department would assist. This letter discusses the key milestones in relation to planning for Koala corridors.

Attachment A provides a timeline summary of these milestones.

Background

The basis for all koala corridors in the Greater Macarthur Growth Area (growth area), in which the Gilead Stage 2 site is located, is the independent advice and recommendations of the Office of the NSW Chief Scientist & Engineer. The first report (dated 30 April 2020) provided considerations for several potential koala corridors in the growth area. Of particular importance, was the recommendation that koala corridors achieve a minimum average width of at least 390m.

To ensure correct interpretation of this report, the Department subsequently submitted two further requests for clarification from the Chief Scientist. The first additional advice was received in February 2021 and the second advice specifically in relation to the Cumberland Plain Conservation Plan (CPCP), was received in May 2021. All the advice can be publicly accessed at:

<https://www.chiefscientist.nsw.gov.au/independent-reports/campbelltown-koala-advice>

A fact sheet on the CPCP advice can be found at: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-fags/Policy-and-legislation/Strategic-conservation-planning/fact-sheet-CPCP-koala-corridors-202208.pdf>. This fact sheet notes:

Although the CPCP does not include the Gilead Stage 2 site, the department has consistently applied all the Office of the NSW Chief Scientist & Engineer's advice ... The advice will guide precinct planning decisions, including the biodiversity certification application for Gilead Stage 2.

Koala corridor methodology

The advice from the Chief Scientist provides a single consistent methodology to plan for Koala corridors. This methodology has been applied across the entire growth area. Some of the key features of the methodology are discussed over:

What is a Koala corridor?

- Each Koala corridor is a single corridor with an 'end to end' point, and is not broken up into multiple smaller corridors.

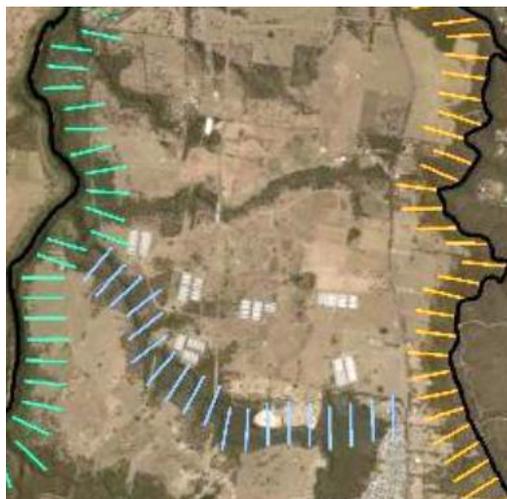
How wide does a Koala corridor have to be?

- As there are a number of existing constraints, such as the Upper Canal, corridors will be narrow in some areas and wide in other areas. While there is no minimum width, the overall corridor from 'end to end' must achieve an average width of at least 390m.

How is the average width measured?

- Transects are applied at regular intervals to measure the width along each corridor. The total length of the transects is calculated and then divided by the number of transects to determine the average width of the corridor. All corridors in the growth area achieve an average width of at least 390m. The excerpt below shows transects applied to the Nepean River Corridor, Georges River Corridor and Corridor E along Ousedale Creek. The Department has also applied the same transect methodology for Corridor A along Menangle Creek and Corridor B along Woodhouse Creek. Further information on transects can be found at: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Reports/Policy-and-legislation/strategic-conservation-plan/Cumberland-Plain-Conservation-Plan-functional-koala-corridors-report-2021.pdf?la=en>

This work has informed the final CPCP and the Gilead Stage 2 Planning Proposal, which are both reflected in the updated structure plan for the growth area.



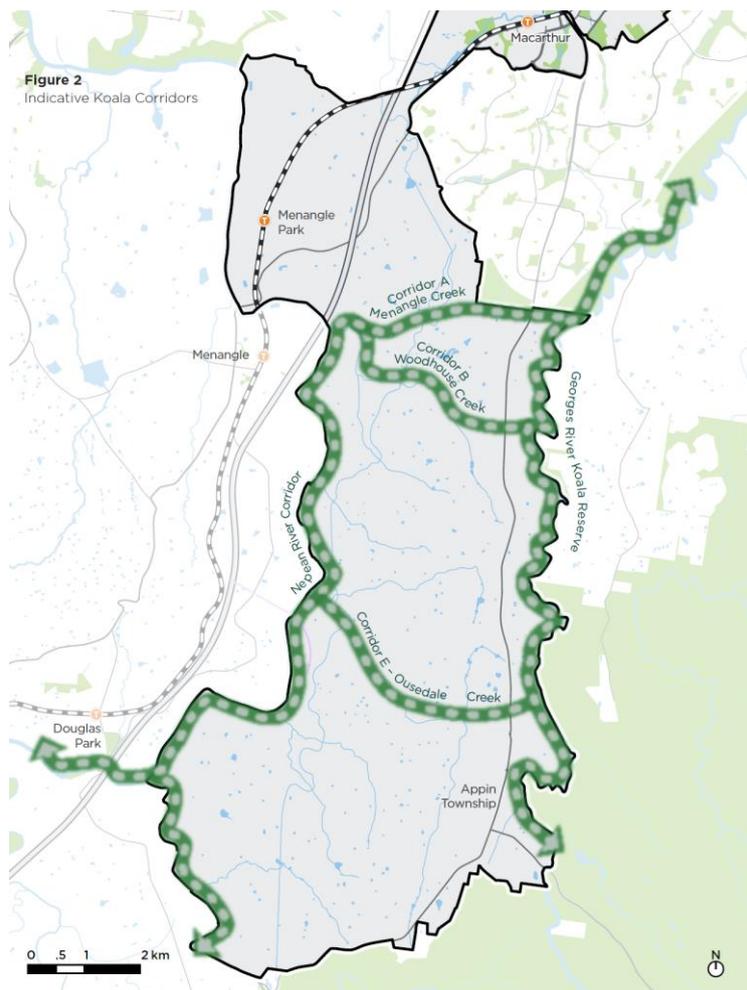
Technical Assurance Panel

The Technical Assurance Panel program (TAP) commenced in October 2020. Through this program, the Department worked with Lendlease, Campbelltown City Council and state agencies to confirm that the Gilead Stage 2 Planning Proposal proposes to secure and deliver koala corridors consistent with the Chief Scientists advice. In addition to this, the proposal also seeks new koala corridor maps, a tailored list of permissible uses within a Koala corridor, and expanding the existing concurrence clause which will require the Planning Secretary's concurrence before consent can be granted to any proposed development within a mapped Koala corridor.

The final TAP advice dated 21 September 2022 discusses these issues and can be accessed at: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Plans-for-your-area/Technical-Assurance-Panel/gilead-stage-2-final-tap-advice.pdf?la=en>. The outcomes of the TAP program are reflected in the current Planning Proposal for Gilead Stage 2, which can be accessed at: <https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/gilead-stage-2> .

Updated strategic framework for the Greater Macarthur Growth Area

In December 2021, the Department published an update to the 2018 Interim Plan (<https://preview.planning.nsw.gov.au/-/media/Files/DPE/Brochures/Greater-Macarthur-2040-Update.pdf?la=en>). This publication included the following indicative strategic map of Koala corridors for the growth area, which will be delivered over time as land is rezoned.



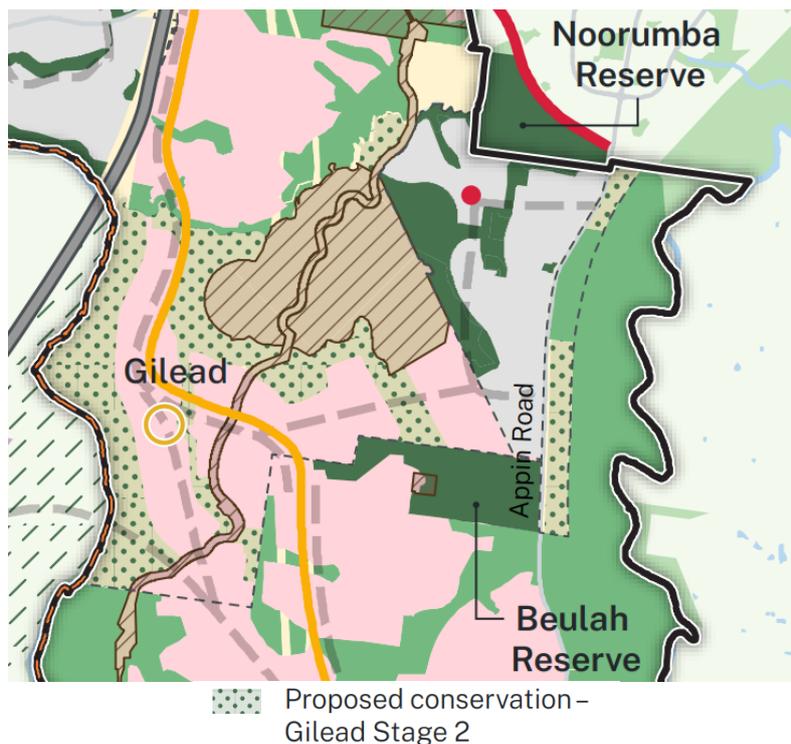
It is important to note, that the identified Koala corridors for the growth area include:

- three 'east-west' corridors:
 - o Corridor A along Menangle Creek
 - o Corridor B along Woodhouse Creek
 - o Corridor E along Ousedale Creek, and
- Two north-south corridors:
 - o Nepean River Corridor, and
 - o Georges River Corridor.

The Department recently published an updated structure plan for the growth area. It can be accessed at: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Plans-and-policies/Plans-for-your-area/Greater-Macarthur-Growth-Area-November-2022-Structure-Plan.pdf?la=en>

The excerpt below of this structure plan shows the proposed conservation land in the Gilead Stage 2 site. Of the identified Koala corridors, the Gilead Stage 2 Planning Proposal is proposing to deliver the following corridors which traverse the site:

- the northern portion of the Nepean River Corridor
- a portion of Corridor A along Menangle Creek, and
- a substantial portion of Corridor B along Woodhouse Creek.



Further, the package of measures to protect koalas are discussed in the recently published *Guide to the Greater Macarthur Growth Area (November 2022)* which accompanies the new structure plan (see pp 17 and 18). The Guide is available at: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Manuals-and-guides/Guide-to-the-Greater-Macarthur-Growth-Area-November-2022.pdf?la=en>

Should you have any questions, you are welcome to contact Ms Naomi Moss, Manager Infrastructure and Place, at the Department on 02 9274 6351.

Yours sincerely



Adrian Hohenzollern
Director, Western
Metro West