

Our Management Approach to Biodiversity

A. Purpose

This document sets out our approach to managing and conserving biodiversity where we operate. It should be read in conjunction with our annual Biodiversity Deep Dive (available on our [website](#)). Together, our management approach documents and deep dive reports comprise our sustainability reporting suite, which is prepared in accordance with the GRI Standards¹ and is independently assured by a third-party.

We recognise the role of biodiversity conservation in maintaining the inherent values associated with Australia's unique flora and fauna. We also know that our customers value access to nature, and so integrating developable land with conservation and enjoyment of biodiversity is critical to the overall success of our masterplanned communities.

We develop new land for housing, including infrastructure and social amenities, to create sustainable, thriving communities. Development brings challenges and opportunities that we manage as we deliver our projects. In particular, developments on greenfield sites can impact local bushland habitat, ecological communities and protected or significant species. Biodiversity conservation is an important component of our strategy to deliver shared value, because investing in biodiversity on or around our sites enhances the liveability of our communities which, as a result, improves customer satisfaction with our business.

Biodiversity is heavily regulated in all jurisdictions where we operate, further underscoring the importance placed on biodiversity by the general public. Actions focused on minimising biodiversity thus mitigate compliance risks and facilitate productive conversations with government authorities about how our developments can maintain or enhance biodiversity value.



B. Management approach

B.1 Understanding biodiversity value and impact

Our developments can maintain or enhance biodiversity value through conservation, investment, secure ownership, and ongoing management, especially when compared with the existing state of many pre-development sites. These sites are often degraded habitat, facing continued impacts from threatening processes. They are also usually in private ownership with no certainty over conservation outcomes. When we develop the site, in some cases we will retain the majority of biodiversity, and in some cases land will be cleared. Where this is the case, conservation in perpetuity of remaining biodiversity or biodiversity off-site provides certainty for ecological communities and species.

We use a biodiversity calculator to assess the change in biodiversity value of our projects based on an initial pre-development value at a site. We developed the biodiversity calculator in FY15 to quantify the impacts of our projects and measure whether we are delivering a positive contribution to biodiversity. The biodiversity calculator assesses pre- and post-development conditions to understand how development activities, rehabilitation achievements, and conservation plans positively or negatively impact on biodiversity values. The calculator uses information on land areas, vegetation types, and other attributes available in development planning documents.

The calculator's assessment of biodiversity value considers state- and Commonwealth-listed threatened species, size and condition of the assets, likely impact, and agreed offsets. In developing the calculator, we built on established methods used by the Green Building Council of Australia to measure changes in ecological value.

¹ The GRI Standards are global standards for sustainability reporting published by the Global Reporting Initiative (<https://www.globalreporting.org/standards/>). The relevant standard for this management approach document is contained within [GRI 103: Management Approach](#).



B.2 Biodiversity targets

Our goal is to better understand biodiversity in the locations where we operate, and to implement protection, management and enhancement initiatives as appropriate. We set targets to guide our actions at three year intervals. Our current target related to biodiversity is:

- for new masterplanned residential communities being planned from FY18, make an aggregated net positive contribution to biodiversity value by FY20 as determined by the biodiversity calculator.

B.3 Biodiversity management approaches

We implement a range of programs to mitigate negative impacts and deliver a positive overall contribution to biodiversity. These may include rehabilitation programs, on- and off-site conservation, the provision of research funding, and the reversal of impacts associated with historical uses such as grazing.

Factors that influence biodiversity impacts and management options vary across our development sites, and include:

- **nature of the biodiversity affected** – including the type of habitat, community or species, the size and quality of the habitat and the viability of bushland, waterway and open space corridors adjacent to our site.
- **planning and design** – urban design considerations such as access routes, the location of town centres and public transport options (both proposed and existing), and the required lot size and quantity to enhance viability and liveability of the development. These decisions can impact the location of infrastructure and housing and therefore biodiversity conservation on a project site.
- **ongoing management** – ownership opportunities and responsibilities beyond the development phase of the project. It is important that if decisions are made to protect long-term biodiversity in urban areas, appropriate ownership models are agreed, such as public ownership by a local council, planning instrument protection such as environmental protection zones, and management considerations such as weed removal, appropriate fire regimes and feral animal control.

Minimum performance standards are included in our Residential Sustainability Policy, which help our communities and assets move beyond minimum standards that may vary according to local regulations.

We use a range of mechanisms to protect land containing biodiversity including:

- creation of parks and dedicated conservation reserves
- the preparation of Biodiversity Management Plans
- covenants on titles where areas of significant ecological value are located on allotments
- conservation zoning and transfer of land to Councils and/or public authorities
- [Biobanking](#) (in New South Wales).

Threatened species with habitat affected by our activities are considered as part of the environmental approval process on each development. In many cases, we are able to conserve local biodiversity and place most or all of the significant species found on our sites into protected areas. These are then integrated into the protected area estates managed by local- or state-level agencies, which are then available to the community and managed for conservation in perpetuity.

We engage construction contractors on the basis that they deliver on biodiversity objectives, including any actions stipulated in project approval conditions. Contractors are managed through regular site meetings and reporting to facilitate compliance with biodiversity conditions.

B.4 Biodiversity management plans

Biodiversity management actions, including any actions stipulated as part of a development approval from any level of government, are integrated into development plans for each site.

Projects with significant biodiversity are required to prepare a biodiversity management plan (BMP), which identifies areas of biodiversity to be conserved or offsets to be provided. It also provides details relating to the rehabilitation or revegetation and protection of biodiversity and the provision of funding to enable appropriate management of protected areas over the long term. The timing of the BMP development relates to the conservation objectives specific to that site, noting that this can occur at any stage throughout the development lifecycle.

We partner with environmental or community groups to deliver activities committed to in the BMPs, such as tree planting, weeding and education programs.



C. Review and evaluation of the management approach

We review and evaluate our performance against our biodiversity objectives as part of our annual [Biodiversity Deep Dive](#). In this reporting, we include:

- a status update and description of progress against our targets
- an explanation of progress on priority actions that contribute to the achievement of key targets
- the identification of future priorities
- highlights of initiatives implemented over the reporting period
- case studies that explore key achievements, usually at particular locations.

We collect data and other reporting content associated with biodiversity from project teams through six-monthly data collection process. The information collected generally relates to progress against biodiversity management objectives, with the exact themes varying depending on the project’s stage in the development lifecycle. For example, at the masterplan completion stage, projects report on expected impacts and management planning. During construction, reporting moves to focus on delivery of management actions.

D. Responsibilities

Roles and responsibilities associated with our management approach to biodiversity are described in the table below.

ROLE	RESPONSIBILITIES
Board Sustainability Committee	Oversight of biodiversity approach, targets and performance tracking
Chief Financial Officer	Responsibility for biodiversity approach and initiatives Reports directly to Managing Director and CEO
Group Executive and CEO Commercial Property Group Executive and CEO Communities	Delivery of biodiversity strategy outcomes within their respective business units
General Manager – Sustainability and Corporate Procurement	Effective implementation and evaluation of our biodiversity approach
National Sustainability Managers	Guide asset teams in effective delivery of biodiversity initiatives
Development Managers and Project Managers	Effective management of biodiversity at a project level

E. Version control

REVISION	DATE	OWNER	CHANGES
1	September 2018	General Manager – Sustainability and Corporate Procurement	