



Chief Executive
Tenterfield Shire Council
PO Box 214
TENTERFIELD NSW 2372

Attention: Mr Bruce Mills

Dear Mr Buckingham

RE: Draft Tenterfield Flying-fox Camp Management Plan, September 2023

Thank you for your e-mail dated 20 September 2023 about the revised draft Naas Street/Millbrook Park, Tenterfield Flying-fox Camp Management Plan (FFCMP) dated 20 September 2023 seeking comments from the Biodiversity and Conservation Division (BCD) of the Department of Planning and Environment. I appreciate the opportunity to provide input.

The BCD has reviewed the revised draft FFCMP and we provide the following comments.

The revised FFCMP more heavily emphasises camp dispersal as a management action than the previous version. As stated in our previous correspondence, the BCD does not support the inclusion of camp dispersal or 'nudging' as management actions in the FFCMP. A Biodiversity Conservation Licence to harm threatened species or their habitats would likely need to be obtained before camp dispersal or 'nudging' could be implemented. The Environment Agency Head is highly unlikely to approve a licence for camp dispersal or 'nudging'.

We acknowledge that camp dispersal is only framed in the revised FFCMP as a potential action for future consideration. Describing it in the FFCMP in this way though, may mislead the Tenterfield Shire Council and local community into regarding it as a viable management strategy, when in fact it is unlikely to ever be a realistic management option.

In our previous correspondence we also recommended the FFCMP be revised to incorporate additional management actions including vegetation trimming to create buffers and identifying the riparian corridor of Tenterfield Creek to the east and north-east of Millbrook Park as a potential location for revegetation to create alternative habitat.

The revised FFCMP reasons that buffers would need to be at least 50 m wide to have any benefit, and that this is not possible for the Millbrook Park camp. The BCD does not agree with this as any buffer width would reduce the intensity of the impacts of flying-foxes on sensitive receivers.

The *Flying-fox Camp Management Code of Practice 2018* (the Code) enables trimming or removal of whole canopy trees at the camp boundary to create a buffer between the flying-fox camp and areas of human settlement, to a maximum distance of 30 metres from any occupied building, if this action is in a Camp Management Plan endorsed by the Environment Agency Head. The purpose of this action is to prevent flying-foxes roosting within that buffer, thereby reducing impacts on sensitive receivers.

The BCD considers trimming or removal of the exotic trees along the southern boundary of Millbrook Park would still provide some improvement to amenity for residents, particularly those immediately adjacent to the camp in the south. We acknowledge the council may choose to seek resident support for the establishment of such buffers before implementing this action.

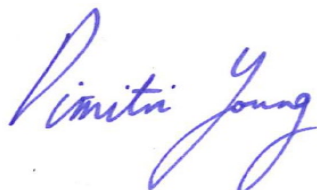
The revised FFCMP also considers revegetation to create alternative habitat along Tenterfield Creek to be impractical because the creek runs adjacent to other urban areas. However, the FFCMP only refers to the parts of the creek to the south and south-west of Millbrook Park. We suggested the sections of the creek to the east and north-east of Millbrook Park as potential locations for revegetation as they are relatively distant from residences and other developed areas compared to the camp's current location.

In summary, the BCD recommends:

1. All references to camp dispersal or 'nudging' as potential or future management actions be removed from the FFCMP.
2. The establishment of buffers between the camp and residential properties with a maximum width of 30m be further considered as a management action in the FFCMP, noting the council may choose to seek resident support for the establishment of such buffers before implementing this action.
3. Revegetation of the riparian corridor of Tenterfield Creek to the east and north-east of Millbrook Park be further considered as a management action in the FFCMP.

If you have any questions about this advice, please do not hesitate to contact Mr Gene Mason, Senior Conservation Planning Officer, at gene.mason@environment.nsw.gov.au or 8289 6315.

Yours sincerely



DIMITRI YOUNG
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Biodiversity and Conservation

30/10/2023