



CLARENCE ENVIRONMENT CENTRE

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To: The General Manager
Clarence Valley Council

via form at www.clarence.nsw.gov.au/Forms/Make-a-submission

Attention: Reece Luxton

Submission on: **Draft CVC Flying-fox Camp Management Plan 2026**

The Clarence Environment Centre (CEC) has a proud history of almost 40 years of environmental advocacy. The conservation of our region's natural environment, both terrestrial and aquatic, has always been a priority for our members and we believe the maintenance of healthy ecosystems and biodiversity is of paramount importance.

To this aim, we have consistently expressed concerns regarding development occurring without due regard to protection of wildlife habitat values, including flying-fox camps.

We appreciate the opportunity to comment on Council's draft Flying-fox Camp Management Plan for the Clarence Valley Local Government Area (LGA). On review, we are satisfied it complies with the statewide direction to balance conservation of flying-foxes, particularly the threatened grey-headed flying-fox, while minimising impacts to the community, principally through planning and education.

We make the following comments:

1. The plan is not LGA-wide

The CEC is disappointed with the scope of the draft plan. Although labelled an 'LGA-wide' plan, it swiftly focuses on only 3 of the contentious camps, providing no management direction for the other camps in the LGA.

The Executive Summary of the plan states:

The Plan also aims to guide future management of any flying-fox camp within Clarence Valley Council and reduce conflicts between residents and the flying-fox camps.

The CEC feels that the plan fails to provide this guidance. To be an LGA-wide plan that guides future management of all camps within the LGA, the plan should provide a framework of clear principles and guidelines that should be applied to all camps, particularly those on lands under Council's control.

Instead, the plan focuses too soon on the specific issues of the Maclean, Ulmarra and Glenreagh camps.

Even the number of camps in the Clarence Valley LGA is not clear from the plan. In Section 1.1, the draft plan states:

Of the 37 known flying-fox camps in the LGA, 22 are located (at least partially) on Council land, within or adjacent to residential areas.

In Section 2.1, the number of recorded camps in the Clarence Valley LGA is reduced from 37 to 34 without explanation. Table 1 names the sites of the 34 camps and these are mapped in Figure 2. We draw your attention to the fact that the South Grafton camp is missing from both, despite the fact it is listed at the start of Section 2.1 as being one of the 8 recently used camps considered as contentious.

In CEC's opinion, Council should only be responsible for managing camps on the land it manages. As a leader in the community, Council's management approach provides direction across the whole LGA. However, the draft plan appears to assume Council will assist and coordinate management actions in relation to the Maclean and Glenreagh camps which are not on Council land.

The bulk of the plan focuses on the Maclean, Ulmarra and Glenreagh camps. It is unclear how these camps were selected and why only they became the focus for the plan. To satisfy the needs of the residents of the Clarence Valley, issues at all 8 contentious camps should have been addressed in the plan. By ignoring 5 of the contentious camps, the plan will be considered a failure by the community.

As a consent and planning authority under the *Environmental Planning and Assessment Act 1979*, Council can assist in reducing negative interactions between camps and human settlement by ensuring that planning schemes appropriately recognise camps and provide buffers for new development. The CEC is fully supportive of Action A03, which would provide additional protections of camps under Council's Development Control Plan (DCP). However, it is unclear how or why annual monitoring of occupation can be incorporated into the DCP's provision. Camp occupation fluctuates from year to year – but the future use of all camps by flying-foxes should be protected, not just their continued use of camps that were occupied in the previous 3 years.

2. Support for no dispersal

The CEC is pleased by the statement in Section 5.3 of the plan that "Level 3 management actions (dispersal) have not been adopted for any of the camps." However, it is unclear whether this statement applies to all 37 (or 34) known camps across the LGA or just to the 3 camps that are the focus of the plan.

We are somewhat reassured that, in Section 5.1, the plan states that Council does not support dispersal. The CEC whole-heartedly shares Council's position on dispersal.

3. Structure of plan is confusing.

The ambiguity identified in point 2 above is a direct result of the plan's poor structure. If it is a general rule, it should have been introduced before the plan focused on the 3 camps at Maclean, Ulmarra and Glenreagh.

It appears some of the information in the plan's sections 3-7 apply across to other camps across the LGA, and not just the 3 focus camps. A better structure would have had general information first, followed by the principles of management that would apply to all camps, and then have the detail of and site-specific actions for each of the 3 focus camps later.

We hope you consider this feedback in finalising the plan.

Yours sincerely

Mark Purcell, Secretary