Attachment 1: Hume City Council comments on Kangaroo Management Plan for Craigieburn West Precinct Structure Plan

18 December 2020

1. Reviewed Document

 Precinct Wide Kangaroo Management Plan for Craigieburn West Precinct Structure Plan (CW PSP).

2. Key Issues

Influence of Kangaroo Management Plan on the PSP

- The need for a precinct wide solution in the form of a Kangaroo Management Plan (KMP) was first discussed over two years ago at the CW PSP inception-meeting. It is disappointing that the first time Hume City Council has had the chance to review the KMP is via the public consultation process.
- It is clear the KMP has had no influence over the land use planning framework that applies to the PSP. The movement and maintenance of Kangaroos through the landscape has not been a priority in the delivery of the precinct structure plan's land use framework.
- Despite not reviewing the KMP, Council has been advocating for self-evident movement corridors and green links in the precinct. Council has advocated for changing the shape of the BCS conservation reserve to abut the green wedge, providing connections through the landscape via the creek reserves and open space networks. Plans for alternative conservation areas have been discussed with the VPA and during the project inception meeting with Ecology and Heritage Partners. Therefore it is disappointing this plan makes no reference to an alternative urban design framework that could result in kangaroos, in particular the northern population, being able to be retained in-situ in the landscape.
- This shortcoming highlights key and fundamental failures of the Biodiversity Conservation Strategy's approach in the delivery of the Melbourne Strategic Assessment. The focus on Matters of National Environmental Significance in isolation, in contrast to the protection of a range of more common species, has led to inconsistent policy positions on flora and fauna. For example the large parcel of Grassy Eucalypt Woodland to be retained completely isolated and fragmented from the broader landscape ecology undermines best practice biodiversity-sensitive urban design. The current design of the open space networks in this PSP also fails to recognise keystone species and their movements through the landscape in waterway corridors and tributaries.

Fauna Sensitive Road Design

- SED supports the placement of culverts crossing Mickleham Road.
 These culverts should also be clearly mandated in the design of creek
 crossings and the locations should be clearly identified where they link
 across Mickleham Road in the PSP. The VPA should gain commitment
 from the Department of Transport that these crossings will be installed
 in the future design of Mickleham Road.
- SED supports the use of other Fauna Sensitive urban design measures including overpasses, road signage and virtual fencing.

Controlling Development Direction and Staged Development

- SED strongly supports the recommendation to control development direction at a precinct wide scale to avoid landlocking Kangaroo populations.
- It is unclear why the plan separates controlling development direction and staging development. These are two sides of the same coin. The purpose of controlling both staged development and development direction is not to 'encourage coordination'. The purpose must be to compel and require coordination in a way that does not result in landlocking. Staged development 'must' rather that 'should' take into consideration kangaroo movement patterns and provide exit routes for the population.
- The Feasibility Assessment table suggests that the 'responsible authority has little to no power to control timing and direction of development across the PSP'. Government's power to control and regulate development is entirely in the control of the Department of Environment Land Water and Planning. If government control is deemed to be an effective and cost-effective method, then the VPA and DELWP (planning) should respond to this recommendation and demonstrate why it cannot be implemented.

Resource Removal

- Water Points SED supports the proactive removal of watering points.
 VPA should respond to how this recommendation will be implemented on a precinct wide scale and how this practice will be incentivised. One issue with early removal of dams is the supervision of the fill placement and consequential risk to future infrastructure. Dam filling should occur under level 1 supervision.
- Water Points The removal of water points should not occur when a
 population is, or becomes, at immediate risk of land locking. This could
 cause significant animal welfare issues. In addition, dam removal must
 not occur in summer, this could cause animals to become at risk of
 dehydration and cause them to move erratically through the landscape
- Food Resources The reference to 'scraping the topsoil' must be removed from the plan. This precinct includes sodic and dispersive soils. The opening up of the topsoil layer is likely to cause additional risk to aquatic habitats. Recommendations should be confined to mowing and slashing. The VPA should respond to how this recommendation will be implemented given Council has no statutory powers to compel land management in advance of subdivision applications.

• Protective Habitat – The general nature of this recommendation is confusing and potentially has risks causing significant amenity and environmental issues. Within this precinct the 'gullies' and 'valleys' are waterway areas – these cannot be 'removed'. The retention of windrows is important for urban heat and wind amelioration. These should not be removed prior to subdivision permits being issued. Please revise this recommendation to remove reference to the removal of gullies or valleys. Much of the treed vegetation referred to as 'protective habitat' is shown as retained in the PSP. No vegetation shown to be retained in the PSP should be subject to this removal of protective habitat recommendation. This is a clear conflict between the KMP and the outcomes sought in the PSP.

In-situ Population Management

- The plan outlines that no population will be retained across the precinct and recommends that all retained conservation areas have no active kangaroo population.
- The exhibited PSP requires this outcome. However, Council has been working with the VPA, Stockland and DELWP on an alternative land use framework that ensures that Conservation Area 29 is pivoted to provide direct abuttal to Mickleham Road. This change would also support the protection of higher value Grassy Eucalypt Woodland Conservation areas. This change should be recommended in the KMP as it ensures that a small population of kangaroos could be maintained in this conservation area. The kangaroos will assist in biomass removal which will aid the management of the conservation area for conservation purposes, and bushfire management purposes. By ensuring the establishment of fauna crossings over Mickleham Road, risks to human life and animal welfare can be managed.
- Given the plan outlines that over 250 kangaroos currently live in the area, it also remains unclear why the only way to achieve in-situ population management will be culling across the entire study area.
- The view this culling could occur within a defined period of time and that there is no chance of 'recolonisation' into the future of retained parks, open spaces, conservation areas and waterways is misguided. Regularly in Hume we experience Kangaroos in highly urbanised landscape. These are large mobile animals and can move back though open spaces and street networks to find habitat. It is therefore much more appropriate to demonstrate a range of kangaroo management solutions across the PSP, rather than relying on removal alone.

Population Control

- Unfortunately, in a case such as Craigieburn West, where kangaroo habitat is being removed, population control will be required. Simply trying to displace the kangaroos to the Green Wedge only increases the risk of kangaroo movement across Mickleham Road causing traffic accidents and increase the tensions between our rural landowners and kangaroos.
- The structure of the paragraph in 5.2.4.1 seems to lead the reader to consider that translocation is a 'widely use conservation and

management strategy'. This is simply not the case in Victoria. Very few salvage and translocation plans get approved by the DELWP Translocation Assessment Panel each year. Mostly the approvals relate to the movement of rare and threatened fauna species for specific conservation actions. This sentence should be removed or modified to represent the current situation facing salvage and translocation of fauna in Victoria.

Feasibility Assessment table

- There is no evidence provided that the use of culverts and bridges to support fauna is cost-prohibitive. Often these structures are required to be built for waterway crossings and therefore they do not add significant costs. If retained, this statement should be backed up by evidence and a cost/benefit analysis or removed from the 'weaknesses'. In the land use framework provided by Hume City Council, a maximum of 3 culverts would be required to maintain fauna movement in the northern section of the PSP. Given the scale of change in the PSP, this is not considered an unacceptable burden on the development industry.
- Removing Resources This section should be revised to discuss the weaknesses of increased risk of sediment on waterways and dust impacts on neighbouring communities
- Management Action (In-Situ Population Management) This should be
 a moderate feasibility action, particularly if HCC approach allows the
 land use framework to define and maintain feasible connections with
 Green Wedge areas. If this option is selected, all kangaroos east of the
 precinct would need to be subject to large-scale culling as they will be
 landlocked in the land left behind in Aitken Creek and Malcolm Creek.
 This approach is likely to be unacceptable to the community. As
 discussed above if culling is selected as a management strategy there
 is a likelihood that some in-situ population may return or remain present.

Management Actions Table

- Speed (Limited Reduction and Virtual Fencing) The majority of the surrounding roads are managed by the Department of Transport (VicRoads). Department of Transport should be co-listed as the responsible authority for this action
- Written confirmation should be provided by the Department of Transport given that they will implement the recommendations of this assessment through the PSP approval process
- Population Monitoring Council should not be listed as the responsible authority for the monitoring of populations, there is no statutory basis nor funding available for Council to undertake this work. DELWP is the responsible agency for wildlife in Victoria and it should be responsible for this action. Council should not support the endorsement of this plan if it remains responsible for this action.

Conclusion

• The preparation of a precinct wide Kangaroo Management Plan is an important first step in obtaining better outcomes for kangaroos in

Craigieburn West. However, this Kangaroo Management Plan fundamentally fails, it has not led to important and critical changes to the Land Use Planning Framework that can see kangaroos retained within the large conservation areas and waterway corridors. Kangaroos are important ecosystem actors and while managing isolated and fragment urban populations can be difficult, this problem would be ameliorated if maintained and connected habitat corridors were designed into the system.

- The proposed elimination of in-situ kangaroos from the landscape is likely to be necessary given the fragmentation of the landscape. But the KMP fails to recognise that elimination in Craigieburn West will also necessitate the removal of kangaroos for all remaining creek reserves in Craigieburn.
- The KMP presents as though the kangaroos have no agency and could not recolonise the retained landscapes by moving back in through the street network via Green Wedge linkages or creeks system. An approach to the land use framework that ensures habitat connectivity from large parcels of conservation and creek reserves should be delivered.