

Submission on the Draft Nillumbik Tree Protection and Management Policy

Re: Draft Nillumbik Tree Protection and Management Policy

Thank you for the opportunity to provide comments on the Draft Tree Protection and Management Policy.

Nillumbik contains one of the most ecologically significant landscapes in metropolitan Melbourne. Its forests, woodlands, roadsides and mature indigenous trees support exceptional biodiversity while also providing enormous benefits to the community through urban cooling, carbon storage, improved air quality, water regulation, wildlife habitat and human health. The municipality's extensive tree canopy is rightly recognised as one of its defining characteristics and underpins both the Biodiversity Strategy and the Urban Tree Canopy Strategy.

While the draft policy contains many positive principles, particularly its stated commitment to avoiding unnecessary tree removal and recognising the importance of biodiversity, it remains fundamentally a tree risk management policy rather than a tree protection policy. Throughout the document, ecological values are acknowledged but rarely embedded within the decision-making framework that ultimately determines whether trees are retained or removed. Instead, operational, engineering and arboricultural considerations dominate the policy.

Given the accelerating biodiversity crisis and increasing impacts of climate change, this represents a missed opportunity. Nillumbik should be developing one of Victoria's strongest tree protection policies, recognising mature indigenous trees as irreplaceable ecological infrastructure rather than primarily as potential hazards requiring management.

Ecological protection should underpin the policy

Trees are far more than landscape features or council assets.

Large indigenous trees are the structural foundation of ecosystems. They support birds, mammals, reptiles, frogs, insects, fungi, mosses and lichens through an intricate network of ecological relationships that has developed over many decades, and often centuries. They produce flowers that sustain pollinators, seed that supports birds and mammals, bark that shelters countless invertebrates, hollows used by hollow-dependent fauna, and extensive root systems that underpin soil health and mycorrhizal fungi.

Unlike built infrastructure, these ecological functions cannot simply be replaced.

The draft policy repeatedly refers to replacement planting as an offset for tree removal. While increasing tree planting is strongly supported, replacement planting should never be presented as equivalent compensation for removing mature indigenous trees.

A newly planted tree cannot replace:

- a century-old Yellow Box supporting nesting parrots;
- a mature Candlebark containing hollows for microbats;
- a River Red Gum supporting hundreds of insect species;
- or a mature indigenous canopy tree regulating local temperatures.

These ecological functions develop over generations.

Accordingly, the policy should explicitly state that protecting existing mature indigenous trees is always preferable to removing and replacing them, except where there is no practical alternative.

The policy frames trees primarily as hazards

Although the policy acknowledges the ecological importance of trees, these values rarely appear to influence operational decision-making. Instead, the assessment framework is largely centred on determining whether a tree presents an acceptable level of risk, rather than first asking how an ecologically significant tree can be safely retained. This distinction is important. A genuine tree protection policy should begin from the presumption that mature indigenous trees are valuable ecological assets whose retention is the default position. Risk assessment should then be used to identify practical measures that allow those trees to be safely retained wherever reasonably possible, rather than serving primarily as a pathway to justify their removal.

Large old indigenous trees require the highest level of protection

Large old trees are among the most valuable ecological assets remaining in Australia's landscapes. They provide irreplaceable habitat through nesting hollows, bark, foliage, flowers and seed, support landscape connectivity, store significant amounts of carbon and help maintain local microclimates. Because these features develop over many decades, or even centuries, they cannot be replaced through replanting. Scientific research consistently identifies the loss of large old trees as one of the greatest threats to biodiversity in south-eastern Australia. While the draft policy appropriately encourages the retention of dead hollow-bearing trees, it provides relatively little additional protection for living mature habitat trees, despite their substantially greater ecological value. Living trees continue to produce nectar, pollen, fruit and seed while supporting fungi, insects and the countless ecological interactions that underpin healthy ecosystems. The policy should therefore explicitly recognise living mature habitat trees as irreplaceable ecological assets and afford them the highest level of protection under Council's tree management framework.

Mandatory environmental review is essential

One of the principal weaknesses of the draft policy is that decisions to remove indigenous trees rely almost exclusively on arboricultural assessment. Arborists possess specialist expertise in tree health, structure and risk management, but ecological significance extends well beyond these considerations. Assessing the value of a tree as wildlife habitat, its contribution to ecological connectivity, its importance within an Ecological Vegetation Class, or its role in supporting threatened species and broader landscape-scale biodiversity requires ecological expertise.

For this reason, I recommend that any indigenous tree greater than 70 cm diameter at breast height (DBH) proposed for removal or major pruning be subject to mandatory review by Council's Environment Team before approval is granted.

That assessment should consider habitat values, hollow availability, threatened flora and fauna, contribution to remnant native vegetation, ecological connectivity, landscape significance and whether reasonable alternatives exist to avoid removal. No mature indigenous tree of this size should be removed solely on the recommendation of an arborist. This relatively simple

procedural safeguard would substantially strengthen the policy's ecological outcomes while having minimal impact on routine operational works.

The assessment framework is inherently subjective

The policy places considerable reliance on the Quantified Tree Risk Assessment (QTRA) framework to inform tree management decisions. While QTRA provides a useful and widely accepted framework for assessing tree risk, it should not be regarded as an entirely objective or deterministic measure of whether an ecologically significant tree should be removed. Many aspects of tree risk assessment—including estimates of the likelihood of failure, target occupancy, probability of impact, consequences of failure and the effectiveness of mitigation measures—necessarily rely on professional judgement. Consequently, different experienced arborists may reasonably reach different conclusions when assessing the same tree. This inherent subjectivity is particularly important where decisions involve large indigenous trees with exceptional ecological value. In such cases, removal decisions should not rely solely on arboricultural assessment. Where there is uncertainty regarding either risk or ecological significance, the precautionary principle should apply, recognising that the loss of a mature indigenous tree is effectively irreversible within human timescales, whereas many perceived risks can be reduced through alternative management measures or further investigation.

Roadside vegetation deserves stronger protection

Roadside vegetation represents some of the most important indigenous habitat remaining across many parts of Nillumbik. These linear reserves frequently contain remnant Ecological Vegetation Classes, large old indigenous trees, intact understorey vegetation and vital habitat corridors linking larger areas of native vegetation. Despite their ecological significance, the draft policy discusses roadside vegetation primarily in the context of clearance requirements, box clearance and road safety, with comparatively little emphasis on its biodiversity values.

The experience along Mount Pleasant Road highlights this concern. The roadside reserve supports remnant Valley Grassy Forest and mature Yellow Box and Candlebark trees that have persisted for generations, providing irreplaceable wildlife habitat while contributing significantly to the landscape character of the area. Increasing traffic volumes, isolated vehicle collisions or community complaints should not, in themselves, justify the progressive removal of such vegetation. Where legitimate safety concerns arise, Council should first exhaust alternative measures such as speed reduction, traffic calming, modified road design, selective pruning or other engineering solutions before considering tree removal. It is unreasonable that vegetation which has survived for more than a century should be progressively lost simply to accommodate increasing traffic volumes or unsafe driving behaviour. Wherever possible, transport infrastructure should be adapted to the landscape, rather than continually reshaping the landscape to suit motorists.

Human health must become a central consideration

One of the most significant omissions from the draft policy is the limited recognition of the human health consequences associated with tree loss. Mature trees are increasingly recognised as essential

public health infrastructure, providing benefits that extend well beyond amenity and aesthetics. Their canopies reduce urban temperatures through shading and evapotranspiration, helping to lessen the urban heat island effect, reduce heat stress, lower the incidence of heat-related

illness and decrease energy consumption during periods of extreme heat. As climate change continues to increase the frequency and intensity of heatwaves, the retention of mature canopy will become an increasingly important component of community resilience and public health.

Equally important are the well-established mental health and wellbeing benefits of access to mature trees and natural environments. A substantial body of research demonstrates that exposure to green space is associated with reduced stress and anxiety, improved mood, greater levels of physical activity, stronger community cohesion and improved overall wellbeing. Conversely, the progressive loss of mature trees contributes to hotter neighbourhoods, declining biodiversity, poorer environmental quality and a diminished connection with nature, all of which have tangible impacts on community health and quality of life. These broader social and health costs are largely absent from the draft policy yet should be recognised alongside engineering, operational and risk management considerations when determining whether tree removal is justified.

Replacement planting cannot offset mature tree loss

The policy appropriately encourages replacement planting. However, replacement planting should never be regarded as full compensation for removal of mature trees.

A sapling may require:

- 50 years to provide meaningful canopy;
- 100 years before developing hollows;
- centuries before providing equivalent ecological complexity.

Consequently, Council's hierarchy should be:

1. Retain existing mature indigenous trees.
2. Mitigate risk through alternative management.
3. Remove only where no practical alternative exists.
4. Replace where removal is unavoidable.

Retention—not replacement—should remain the primary objective.

Recommendations

To strengthen ecological protection, I recommend that the policy be amended to include the following:

1. Require mandatory review by Council's Environment Team before removal or major pruning of any indigenous tree greater than 70 cm DBH.
2. Require ecological assessment alongside arboricultural assessment for all significant indigenous trees proposed for removal.
3. Recognise mature indigenous trees as irreplaceable ecological infrastructure whose ecological values cannot be replaced through replanting.
4. Explicitly incorporate biodiversity, climate resilience, human health and mental wellbeing into all removal decisions.

5. Strengthen protections for roadside remnant vegetation, recognising its importance for habitat connectivity and biodiversity.
6. Adopt the precautionary principle where uncertainty exists regarding ecological values.
7. Require annual public reporting on:
 - indigenous tree removals;
 - habitat tree removals;
 - canopy loss;
 - replacement planting;
 - survival rates;
 - biodiversity outcomes.
8. State explicitly that replacement planting does not compensate for removal of mature habitat trees, and that protection of existing mature trees should always take precedence.

Conclusion

The Draft Tree Protection and Management Policy establishes a useful operational framework and contains several welcome commitments, particularly its stated intention to avoid unnecessary tree removal and recognise biodiversity values. However, in its current form it remains weighted towards managing risk rather than protecting ecological values.

Nillumbik has an opportunity to develop one of Victoria's leading tree protection policies by placing biodiversity conservation, climate resilience and human health at the centre of tree management.

Large indigenous trees are not simply council assets. They are living ecological infrastructure that has developed over generations and supports extraordinary biodiversity while providing immense benefits to the community. Once lost, these values cannot be replaced within our lifetimes.

Public safety is essential, but it should be achieved through balanced, evidence-based decision-making that gives ecological values equal standing with engineering and operational considerations. By strengthening environmental oversight, recognising the limitations of subjective risk assessment, protecting large indigenous trees and explicitly acknowledging the human health consequences of canopy loss, Council can ensure this policy genuinely protects the natural character and ecological heritage that make Nillumbik unique.

