



The CEO and Board Members  
National Capital Authority  
Email: [sally.barnes@nca.gov.au](mailto:sally.barnes@nca.gov.au)

30 June 2021

**Your reference 444449**

Dear Ms Barnes

Thank you for sending the early notification letter (dated 27 May 2021) to the Guardians regarding the replacement of *Populus nigra* 'Italica' outside the National Library that are senescent and damaged, with *Quercus robur* Fastigiata, on the grounds that the ACT Government has declared the tree prohibited in the ACT.

We regard this as an issue of dealing with tree senescence within a heritage landscape that lies within Commonwealth Land, adjacent to ACT Government Land and a serious issue that may create a precedent for the replacement of other trees/plants in the future under the management of the NCA. It is important that a defensible, best practice process needs to be undertaken now, and under similar circumstances, in the future, to ensure that the NCA follows its fundamental duty of care in the management of its estate.

Originally the poplars in front of the National Library of Australia were chosen by Richard Clough out of a choice of them or ginkgos, in consultation with the architects of the National Library. There is detailed documentary evidence for Clough's choice of poplars as an aesthetic feature at a height (they grow up to 30m) to emphasise the National Library (reference information is in the NLA). It is apparent the yellow colour of the autumn leaves was important. Although the proposed replacement trees, *Quercus robur* Fastigiata, do have fastigiate form, their leaves are a darker green and their autumn colours are a reddish brown not yellow. They grow to a height of 13-15m. They are slow to lose their autumn leaves giving a drab winter appearance. A major issue is that they are dense and double rows of them will create a wall of trees that will be shady and cold in winter.

There are other options:

Replace the poplars on their own (suckering) roots with grafted poplars on **non-suckering** root stock. This is being progressively done at Berridale, NSW – they grow and mature fairly quickly and leave the landscape values intact without the sucker problem.

Poplars can also be planted in large underground pots as they were in the replacement trees in Old Parliament House.

Manage the new poplar plantings such as done in the avenue east of Braidwood where more than 70 poplars are managed simply and successfully. It takes less than a day's work for 3 men to take all the suckers off and around the entire avenue of trees around every 3 years.

A more suitable replacement option for the poplars could be *Lirodendron tulipifera* 'Fastigiata' as done in Sydney around the Anzac Memorial Reflection Pond. Tulip trees colour yellow in autumn. They're slower than poplars and need water but eventually will get tall up to 30m to match the library's scale. They're also a bit more transparent than *Quercus robur* Fastigiata in tracery/leaf and not dense blockages, crimping the view and making a set of walls.

Furthermore the Parliamentary Zone is on the Commonwealth Heritage List. Changing the fabric of the heritage trees is as unacceptable as changing the exterior of the fabric of the National Library. Exceptions in this case at the National Library should show more empathy with colour, form and texture of poplars. The poplars are an integral part of the historic landscape in front of the NLA, and removal of the trees and their replacement is in conflict with the NCA's legislative obligations under the EPBC Act and the National Capital Plan.

The ACT Government is not the planning decisionmaker for Commonwealth Land. The simple listing of prohibited plants is insufficiently sophisticated as it takes no account of the particular location of trees, their historic design value, role in a cultural landscape and management options that might be taken to reduce or eliminate any risks they might pose. The ACT Government has *Populus nigra* 'Italica' listed as prohibited in *Plants and Animals (Pest Plants) Declaration 2015 (No 1), Disallowable Instrument DI2015 – 59*.

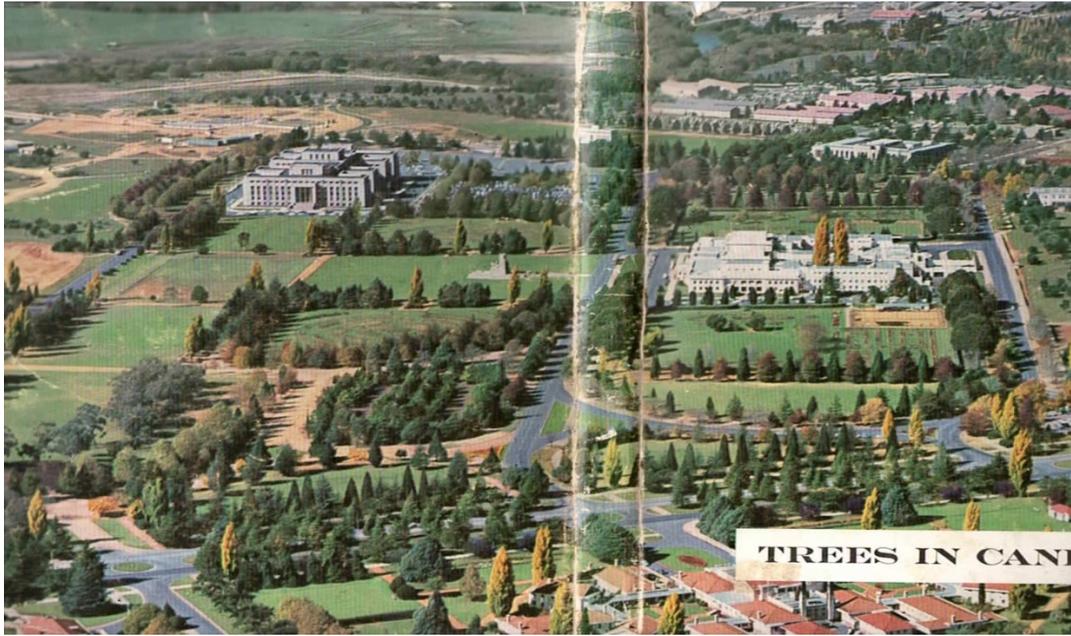
The presumed threat is the unwanted spread of the poplars from this site. These poplars reproduce through suckers. Proportionate risk management of the threat should be determined by the great heritage benefit the maintaining this species in this location. If the threat demanding prohibition of this species in the NLA forecourt then poplar replacement with advanced trees and sucker management as required is the solution. Within the Parliamentary Zone the *Populus nigra* 'Italica' species is currently well-managed - as exemplified by the successful poplar replacement (using pot grown trees, planted in underground pots) within the Old Parliament House courtyard.

Respect for the ACT Government approach is still possible by recognising the danger of their prohibited species, managing them in a more nuanced manner when they are in sensitive locations using a different, principled, best heritage practice policy where they are on Commonwealth Land as the NCA is still required to follow heritage policies in the National Capital Plan.

The *Populus nigra* 'Italica' planted in the Parliamentary Zone are heritage landmarks – tall, columnar trees (around 30m high) with yellow leaves in autumn that are deciduous with branch tracery in the winter. The original planting of poplars in the Parliamentary Zone were established as highlights in the areas treescape, and in this particular case, referencing the National Library's classical columns.

The historic image below shows this feature and how paving squares in front of Old Parliament House were laid out with the poplars as central landmarks. The concern now is that the proposed replacement will set a precedent in the Parliamentary Zone for the replacement of other poplars.

Although we have not yet viewed the heritage assessment report and had a chance to consider it, we are sending this letter as a response to your letter in the hope that the comments and suggestions raised will be considered before your proposal is put out for public comment.



Yours sincerely

*Juliet Ramsay*

on behalf of  
Lake Burley Griffin Guardians

Images over



*Populus nigra* 'Italica' (Pryor and Banks, 1991)



*Quercus robur* 'Fastigiata' (located Alexandrina Drive imagine taken June 2021)