



20 December 2022

To Ms Sally Barnes
Chief Executive NCA
sally.barnes@nca.gov.au

Dear Ms Barnes

Lombardy poplars replacement — National Library of Australia forecourt

I write to you as Chair of the local Branch of the Australian Garden History Society (AGHS). AGHS is a national organisation with a mission to promote awareness and conservation of significant gardens and cultural landscapes through engagement, research, advocacy and activities.

Recently we have become aware that the NCA is restarting a project to replace the Lombardy poplars (*Populus nigra 'Italica'*) at the National Library of Australia (NLA) forecourt. In 2019 our Branch made submissions to the NCA about these trees during consultations for the development of the NCA Tree Policy.

We noted then and still affirm that:

- The two double rows of Lombardy poplars planted in 1967 by Richard Clough, NCDC landscape architect, to frame the entrance to the National Library of Australia have heritage significance for a variety of reasons that have been well documented in several official heritage reports.
- To replace missing dead and dying trees the site should be replanted *with the same species*, notwithstanding that Lombardy poplars are prohibited under the *Pest Plants and Animal Act ACT (2005)*, because the issue of the trees' suspect weediness could be controlled through management and active maintenance of the site.
- An exception to their use should be negotiated with the ACT Government to allow replanting with the same species to retain heritage values.

Due to the ACT pest plants legislation the NCA first suggested replacing the poplars with fastigiata oaks, but this met with public opposition because these trees were not sufficiently similar to the poplars in size, colour, columnar shape, autumn colour and autumn leaf shedding. In short they were a poor choice and we are relieved that it has been rejected.

The current choice of replacement tree that AGHS understands is being pursued by the NCA is the Tulip Tree (*Liriodendron tulipifera Fastigiata*). This has similar columnar shape to the poplars, yellow autumn leaves and bare tracery of branches during winter. While shorter than the poplars they are a far better choice than the oaks, but also an introduction of a new species to the existing plant palette of the Parliamentary Zone. In addition the Tulip Trees are far “showier” than the poplars due to their flowers and would lack the same sense of gravitas to the NLA forecourt entrance that the poplars offer. The publication *Trees and Shrubs in Canberra* 1991 by Lindsay Pryor and John Banks notes that while Lombardy poplar is well adapted to the Canberra climate, the Tulip tree (described by them as “magnificent”) does not withstand the dry conditions of Canberra well.

The removal of the poplars and their replacement with a different species will have a significant adverse effect on the heritage values of the setting of the NLA, the landscape of the Parliamentary Zone and the Parliament House Vista. Actions by the NCA impacting the heritage values of sites in these locations are subject to the *Environment Protection and Biodiversity Conservation Act (1999)* (EPBC Act).

The NLA forecourt Lombardy poplar trees have significant heritage values and under Federal legislation the retention of this species in the landscape of the Parliamentary Zone is necessary because:

1) The NLA trees have direct association with an important designer of heritage landscapes. Richard Clough deliberately chose the species for their vertical and formal shape to complement the building style of the National Library and frame the forecourt. The other species he considered was *Ginkgo biloba fastigiata*, a deciduous Japanese conifer with yellow autumn colour. His choice of tall thin Lombardy poplars, which also turn dramatic yellow in autumn, was a deliberate aesthetic choice based on Clough’s observations of the growth of poplars planted in Canberra in the 1920s, specifically those in the nearby Old Parliament House courtyards. Here Clough was following a historic custom in the Parliamentary Zone where TC Weston and Walter Burley Griffin had promoted plantings of mostly conifers and eucalypts for a dignified and sombre landscape effect, with strategically placed Lombardy poplars as dramatic aesthetic landmarks, especially in autumn.

2) The NLA poplars are a deliberately planted element in the forecourt of the landmark building of the NLA which is entered on the Commonwealth Heritage List (CHL) under the title “National Library of Australia and Surrounds”. The NLA forecourt landscaping is also part of the Parliament House Vista that is entered on the CHL. Management of heritage places on the CHL is subject to the provision of the EPBC Act and the NCA is required to protect their heritage values in accordance with Commonwealth Heritage management principles and reference to the *Australia ICOMOS Charter for Places of Cultural Significance 2013* (the Burra Charter). The NCA’s National Capital Plan also requires adherence to the Burra Charter advice that specifies replacement of fabric with “like for like” as best practice for heritage conservation. Replacement of poplars with a different species is not “like for like”.

3) The replacement of Lombardy poplars with a different species is potentially damaging to the wider significant heritage landscape of the Parliamentary Zone and the CHL inscribed Parliament House Vista. The action could set a precedent for the future of important landmark poplar plantings in these areas, including those at the highly significant Old Parliament House, which is on the National Heritage List.

AGHS understands that the ACT Government advises use of the Tower Poplar, *Populus x canescens* 'Tower', as an alternative when replacing Lombardy poplars. Tower poplars have a tall columnar shape with green leaves turning yellow before falling in autumn. They are similar to the Lombardy poplars but have a different leaf shape and bark. They also grow to only half the height of the Lombardy poplars and have a shorter life span. They are a better alternative than the Tulip trees but would not match the scale of the NLA in the same way as Lombardy poplars.

AGHS is aware that the ACT Government has refused the managers of the Museum of Australian Democracy, Old Parliament House, permission to replant heritage Lombardy poplars in their courtyards because they are a declared plant pest, and that at such a visible site, replanting them "*could be seen as sending the wrong message to the community regarding the ACT Government's commitment to the management of invasive weed species*". In fact an uninformed observer might think that Tower poplars were Lombardy poplars (same shape, same autumn colour), so their use would still require an advertisement/education campaign to assuage this.

Poplar suckers are not difficult to take off and are easily controlled by pruning and maintenance mowing of surrounding grass. When the NLA poplars were examined in December 2022 for this correspondence there were no suckers visible there, or evidence that any had ever grown. Equally any fallen branches or twigs, which may take root in certain circumstances, can also be removed with regular maintenance.

Lombardy poplars could be replanted by the NCA with an exemption in ACT law based on a commitment to actively manage the potential for spreading via suckers and dropped twigs, and an advertising/education campaign to explain the importance of retaining the use of this heritage species in the limited locations where it occurs in the highly significant landscape of the Parliamentary Zone. This would retain the authenticity and integrity of the landscape while also educating the public about heritage values and active management to avoid weedy spreading of Lombardy poplars away from these specific sites.

The NLA poplars are heritage trees and their management is subject to the EPBC Act. Under the Act, before a Commonwealth Agency undertakes any action likely to have an adverse effect and impact heritage values, all feasible and prudent alternatives should be investigated, and all measures that can reasonably be taken to mitigate the impact should be investigated and implemented. Chapter 6 Part 16 of the legislation advises the precautionary principle in making decisions that damage heritage values. Likewise Burra Charter principles are based on a cautious approach to change – doing as much as necessary to care for a heritage place, but as little as possible so that its cultural significance is retained.

In conclusion, the Lombardy poplar trees do well and even thrive in the Canberra climate. Tulip trees will require additional irrigation, which is problematic in an era of climate change, and are undesirably more theatrical in their flowering aesthetics. The Tower poplar is a better alternative but would still break the historic associations of the Lombardy poplars in the Parliamentary Zone while also being overall far shorter, less long-lived trees.

AGHS agrees that if left to their own devices, poplars can create dense thickets through suckering. Near watercourses and in the bush, poplars can naturalise to directly impact rare and threatened species. However, in an intensely managed designed landscape within the Parliamentary Zone, they would not pose such a risk, as they do not propagate via seed, only through suckers or rarely fallen branches that are easily managed.

AGHS considers that maintenance management to control this perceived weediness is both feasible and prudent as recommended in the legislation, and is a precautionary approach adhering to Burra Charter principles. AGHS suggests that the NCA negotiate further with the ACT Government to secure a permit, as is allowed under S.14 of the pest plant legislation, to allow replanting of poplars at the NLA site with management as above and an advertising/education campaign.

This course of action would mitigate adverse impact to the significant heritage landscape values embodied by the Lombardy poplar species there and in the wider Parliamentary Zone. It would fulfil NCA obligations under the EPBC Act and ensure that the Lombardy poplars do not spread by suckers or fallen wood. A public advertising/education campaign on why a “weed” species is being used in a significant heritage context could educate the public about the heritage landscape and dispel any community misunderstandings about the ACT’s commitment to invasive weed control in all other situations.

The ACT environmental weed legislation should not necessarily override Federal heritage legislation where a solution to mitigate both loss of heritage values and the potential environmental weed threat has been clearly noted and is available.

The AGHS hopes that you are successful in further negotiations with the ACT Government so that the significant heritage values of the Lombardy poplars in the NLA forecourt (and wider Parliamentary Zone) are retained.

I look forward to your reply.



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