



## LAKE BURLEY GRIFFIN GUARDIANS INCORPORATED

Ms Sally Barnes  
CEO, National Capital Authority  
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Your ref.: 524812  
13 December 2022

Dear Ms Barnes

### **Replacement of Lombardy Poplars at the National Library Forecourt**

Thank you for your letter of 1 December 2022. We appreciate being informed on your planning to replace Lombardy Poplars. We understand the species *Lirodendron tulipifera* has been used for tree replacement beside the Pool of Reflection at the ANZAC Memorial, Sydney. Although this species variant appears to be attractive and a more suitable choice than the fastigate oak you previously proposed in terms of leaf shape, height and autumn colour we still have concerns about this change to the character of the Parliamentary Triangle, as described below:

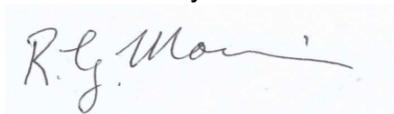
- The *Lirodendron tulipifera* 'fastigiata' tree's height range is 4-20m therefore at least 10m shorter than the Lombardy Poplar and will not provide the same sentinel quality as provided by the Lombardy Poplar. The Lombardy Poplar within the Parliamentary Triangle is a design feature of this property, identifying key buildings and landscape spaces. Introducing another species to perform this function in this highly significant landscape conflicts with the established heritage fabric and landscape pattern of the Parliamentary Triangle even if that species has similar autumn colour and a columnar form. Has the *Lirodendron tulipifera* 'fastigiata' been trialled for Canberra's harsh climate conditions?
- Although you claim the ACT Government will not allow replacement of Lombardy Poplars in the ACT, their legislation, the ACT's *Pests, Plants and Animals Act 2005* Act allows under s14, permits to be given to propagate, import or supply prohibited pests if satisfied that 'the propagation, importation or supply would not result in the spread of prohibited pest plants in a way that would endanger the environment or agriculture'. We know that Lombardy Poplars are a pest in some rural areas along water courses but in the Parliamentary Zone they are a well-managed significant feature of the cultural landscape. Lombardy Poplars are also well managed in some country towns, in some cases have been planted in tubs or with root guards avoid suckering and we believe there has been successful Lombardy Poplar replacement with non-suckering root stock following sound root zone preparation.
- Similarly, the advice, in a letter (provided to the Guardians by yourself) from the ACT Director-General of Environment, Planning and Sustainable Development to the Museum of Democracy (dated 1 August 2022), concerning the importation and planting of *Populus nigra 'Italica'* in the courtyards of Old Parliament House, and declining this proposal on the basis of the Act (mentioned above) and 'sending the wrong message to the community',

carries no legal weight on Commonwealth Land. This is especially so as the Commonwealth has chosen to show particular interest in this cultural landscape containing these architectural trees, by including it as part of the Commonwealth Heritage List Parliament House Vista and the Library Forecourt is clearly important as an exterior landscape/setting of the separately listed NLA. We realise the ACT Government is only concerned about the suckering properties of Lombardy Poplars and not the impact on the heritage landscape fabric that was established with considerable design planning by JS Murdoch, TC Weston and R<sup>1</sup> Clough. The heritage landscape qualities will require careful explanation to the ACT Government officials.

- The alternative planting proposed by Director-General Ponton to use hybrid *Populus x canescens* 'Tower', has a maximum height of only 15m, half the height of the Lombardy Poplar and is also reported to sucker. However, the existing Lombardy Poplars now demonstrate sound health and would require just a little arboreal pruning of dead branches to again become an admirable corridor. In fact, removing these trees and their roots for any new planting could be difficult undertaking.
- We continue to be unclear why the NCA seems to be adhering to a proposition that a subsidiary Government's legislation overrides the *Australian Capital Territory (Planning and Land Management) Act 1988*. If you have official comments from the ACT Government on this topic beyond that already provided that prevents the use of Lombardy Poplars it should be made public.
- The approach proposed is both contrary to the *EPBC Act (1999)* and your own National Capital Plan and Tree Management Policy which both require adherence to the Burra Charter and indicates a replacement of 'like for like' is the best practice heritage conservation approach in the present circumstances.

We have raised these points with you previously and have not received a cogent response to our concerns. We are now further disturbed that you have already taken your proposal for Lombardy Poplar replacement to the Department of Agriculture Water and Environment. Your present course sets a potential precedent across the Parliamentary Triangle (as noted by Marshall in his specific 2021 *Heritage Impact Assessment*) and seems to be regardless of the significant adverse impact on the heritage fabric of the most important cultural landscape in the National Capital.

Yours sincerely



Richard Morrison and Juliet Ramsay  
Lake Burley Griffin Guardians

cc Ms Ashley Tenison, Acting Manager, Museum of Australian Democracy, Old Parliament House  
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cc the Heritage Division, Department of Agriculture Water and Environment