

30 January 2026

ADDRESS REDACTED

**The Hon Sonya Kilkenny MP,**  
Minister for Planning  
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Cc: Ms Lorraine Dowsey, Manager, State Planning, Assessment and Facilitation Division  
[Lorraine.dowsey@transport.vic.gov.au](mailto:Lorraine.dowsey@transport.vic.gov.au)

Dear Minister,

I am only too aware of the enormous pressure that local councils are under to increase recreational space for tennis, netball, basketball courts and for pitches and ovals, particularly as the expansion of women's sport continues. The State Government also places demands on councils in this regard.

I was heartened by your statement "By protecting our tree canopy, we're making sure communities across our suburbs can enjoy the benefits of shade, cleaner air and more liveable neighbourhoods for generations to come." (1)

However, rather than increasing public space what is happening is that trees and greenspace are being lost to provide space for facilities. No level of government is addressing the genuine need for greater recreational space with a strategy and funding to provide new space. As a consequence public greenspace is under great threat.

Given climate change, it is extremely disappointing and short sighted that trees, canopy cover and greenspace are decreasing across Melbourne. Given its low canopy cover and high Urban Heat Island Effect (UHIE), the City of Yarra and the State Government should be doing all they can to preserve trees, canopy cover and greenspace, rather than approving projects that reduce them. They need to be thinking about climate change and future heat wave effects on human health and wellbeing and the likelihood of increased heat wave related deaths.

The tree replacement program in the proposal, even if successful, will not replace the existing canopy for decades, and we don't have that time as climate changes rapidly. The replacements while necessary are never a real compensation as to replace a single large trees requires somewhere between 8 and 20 smaller trees to give significant benefits in the medium term, and there is no mechanism to ensure that planted replacement trees establish and thrive.

In relation to the impacted trees in Edinburgh Gardens, as I understand it, some are protected under the Heritage Overlay in the Yarra Planning Scheme. I have reviewed the comments and images for the impacted trees 8-11 in the Arborist Report (2) and the comments from the second arborist report (3).

In relation to the reports, I would note:

- There is nothing that I can find that is wrong or poorly considered
- However, this is at least in part because there is little detail
- These are pretty much typical reports for elms of this age that have been managed in a public park for a century or so

- There is no mention of a risk assessment or imminent danger
- In short the arborists' consider tree removal for the development works; not because the trees are unhealthy or dangerous
- I agree (3) that the trees if properly managed could have at least 30 years of safe useful life and good amenity ahead of them
- Indeed if properly managed, the trees may have a future in excess of 50 years
- I accept the report's comment (2) that there will be **major encroachment** under AS4970, *Protection of trees on development sites*, but this does not necessarily mean tree removal.
- You can manage encroachment if there is a will to do so.

It is unusual for an arborist to write about demolishing trees, this is a heritage term for buildings. The heritage overlay requires a permit to fell or lop these significant trees.

Sincerely,

Dr. Greg Moore B Sc(Ed), B Sc(Hons), PhD, OAM  
Senior Research Associate, School of Ecosystem and Forest Sciences, The University of Melbourne. Chair Register of Significant Trees, National Trust of Australia (Victoria).

1. Minister for Planning, Sonya Kilkeny, 14 September 2025; '500,000 MORE TREES FOR MELBOURNE'
2. Arboricultural Impact Assessment, Urban Forestry Victoria P/L, Arboricultural Consultation, Trevor Moulynox, 16/06/2025]
3. Arborist Report, Galbraith and Associates