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20 February 2026

Dear Deputy Secretary Elizabeth Molyneux,

City of Port Phillip's submission to the Electric Line Clearance Review

Thank you for the opportunity to make a submission for the Electric Line Clearance Review. Electric line safety is critical, and ensuring the safety and functionality of the electricity network as critical infrastructure is paramount.

The City of Port Phillip is the most densely populated local government area in Victoria with a population density of 5,029 people per square kilometre. Our urban environments include many critical infrastructures, and they all have safety and functionality requirements. There is a lack of space in denser areas of our cities to provide for all infrastructure requirements, including trees and vegetation.

Trees and vegetation are critical green infrastructure. Our urban forest is an essential part of our highly urbanised environment. The urban forest directly impacts our City's livability now, and into the future. Trees and urban forests are recognised and used globally to manage Urban Heat Island (UHI), water and water quality, to improve health and wellbeing outcomes, and as an important contributor for biodiversity, ecosystems and habitat. There is a well-established body of evidence confirming the urban forest offers a multitude of benefits to people, economies and nature in cities. Urban forests have been recognised as the most cost-effective way to mitigate against localised risks from climate change. The latest Intergovernmental Panel on Climate Change (IPCC) report found that urban greening has been effective in reducing flood risks and urban heat.

In recognition of the importance of trees and vegetation in urban environments, and in alignment with evidence-based best practice, a core urban forest target for Port Phillip is for streets to reach 30% canopy cover by 2040. In 2025 the Victorian State Government introduced a 30% canopy cover target for all urban areas. The proposed reforms mention the importance of trees for localised climate change risk mitigation but make no changes that would make significant improvements to achieve 30% canopy cover; essentially discounting the climate change risk.

Port Phillip's tree assets include 46,000 trees, 75% of which are street trees. We manage approximately 17,000 under powerlines. Street trees in Port Phillip are vitally important and because of our dense urban form, canopy cover in our streets is higher than on private property.

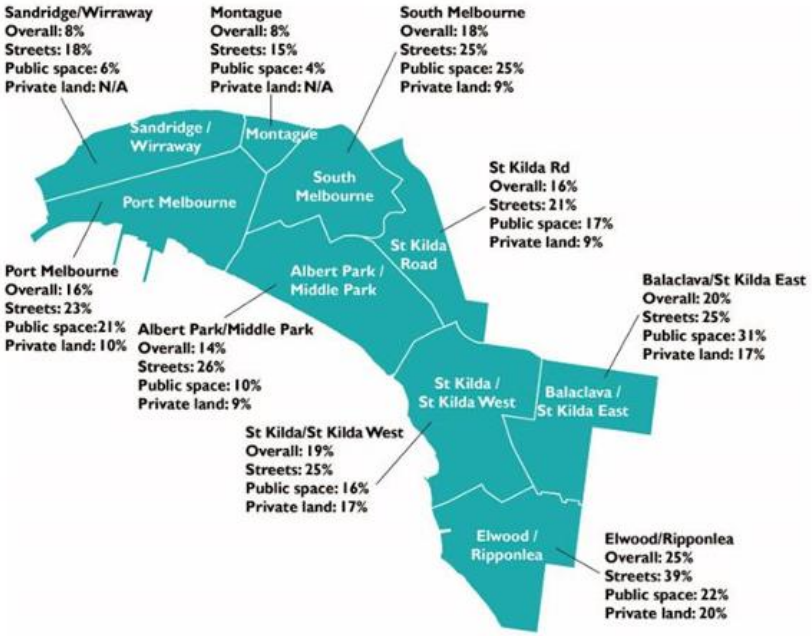

Figure 1: Canopy cover distribution across the nine neighbourhoods of the City of Port Phillip, 2022.

Given the importance of trees in urban environments, it is disappointing that the proposed reforms do not take the opportunity to address network upgrades that would reduce vegetation removal, including requirements for covered conductors, bundled cables, undergrounding, insulation of low voltage lines. Trees are shaped around powerlines; powerlines should also be shaped around trees as both are critical infrastructure.

All metropolitan Councils, including Port Phillip spend considerable taxpayer resources on tree assessments and tree pruning for electrical line clearances, and directly pay for any network upgrades that safely reduces tree pruning requirements so that electrical safety and tree canopy can be optimised.

The proposed reforms miss opportunities to promote multi-sector data sharing to improve safety and responsiveness. LiDAR-based inspections are extensive for electricity distributors, but datasets of assets or LiDAR data are not shared. Duplicating data for each Council is expensive and unnecessary. Data sharing could reduce inspection and reporting labour for all Councils and offer opportunities for consistent and robust data collection.

The proposed reforms include optional trials to reduce clearances around low volage lines. As proposed, these optional trials place the bulk of administrative burden and risk on Councils and will likely significantly increase Council costs. These risks will impede the City of Port Phillip from participating.

Please see our feedback on the review via the attached submission below. Should you have any further enquiries, please reach out to Dana Pritchard, Manager Open Space, Recreation and Community Resilience via Dana.Pritchard@portphillip.vic.gov.au

Kind regards,

Cr Alex Makin
Mayor, City of Port Phillip

City of Port Phillip
Submission to Electricity Safety (Electric Line Clearance) Regulations Review

In 2025 the Victorian State Government introduced a 30% canopy cover target for all urban areas. The proposed reforms mention the importance of trees for localised climate change risk mitigation but make no changes that would make significant improvements to achieve 30% canopy cover; essentially discounting the climate change risk.

We urge a rethink of the scope of the review to include an investigation of other initiatives that will enable all urban infrastructure, including trees and powerlines, to provide healthy, safe and supportive environments for our communities. We encourage you to more strongly consider the impacts of climate change, and particularly the urban heat island effect.

As the climate continues to change, cities are getting hotter. Maximum annual temperatures could increase by up to 1.6˚C by the 2030s and up to 2.7˚C by the 2050s under a high greenhouse gas emissions scenario, with the number of extreme heat days (maximum >35˚C) and nights (minimum >20˚C) both projected to more than double by the 2050s (extreme heat days up from 8.3 to 20.4, extreme heat nights up from 5.8 to 18.4)[1] To put this in perspective, Melbourne's climate is expected to be more like Wangaratta's is now by the 2050s (a regional city over 200km inland).

Heatwaves kill more Australians than any other natural hazard[2], and place great pressure on Council assets. Urban heat can have a direct and serious impact on people's health, wellbeing and safety[3]. More specifically, urban heat can increase energy use, peak electricity demand, heat related mortality and morbidity, and levels of harmful pollutants[4], as well as causing significant loss of income for local businesses[5].

A key opportunity for the City of Port Phillip is to manage its future growth in a way that does not limit its ability to mitigate and adapt to increasing urban heat. The City of Port Phillip has set urban heat reduction as a key priority in developing a greener, cooler and more liveable city that is resilient and can adapt to climate change[6]. Many of the City of Port Phillip's strategies, guidelines, plans and policies therefore prioritise the need to minimise the impacts of urban heat.

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[1] Clarke JM, Grose M, Thatcher M, Round V, & C, H. (2019). *Greater Melbourne Climate Projections 2019*. Melbourne, Australia. CSIRO. https://www.climatechangeinaustralia.gov.au/media/ccia/2.1.6/cms_page_media/508/Vic%20Climate%20Projections%202019%20Regional%20 Report%20-%20Greater%20Melbourne.pdf

[2] Climate Council (2014) '*Heatwaves: Hotter, Longer, More Often'*, accessed at https://www.climatecouncil.org.au/resources/heatwaves-report/

[3] Santamouris, M. (2015). *Regulating the damaged thermostat of the cities—Status, impacts and mitigation challenges*. Energy and Buildings, 91, 43-56. https://doi. org/10.1016/j.enbuild.2015.01.027

[4] Santamouris, M. (2020). *Recent progress on urban overheating and heat island research. Integrated assessment of the energy, environmental, vulnerability and health impact. Synergies with the global climate change*. Energy and Buildings, 207, 109482. accessed at: https://doi. org/10.1016/j.enbuild.2019.109482

[5] Sweeney Research, & City of Melbourne. (2014). *A Quantitative Research Report on: 2014 Heatwave Business Impacts* - Social Research. https://www.melbourne.vic.gov. au/sitecollectiondocuments/eco-impact-of-heat-waves-onbusiness-2014.pdf

[6] CoPP (2018) *Act and Adapt: Sustainable Environment Strategy* 2018-2028

We would welcome investigations into greater use of, and support for covered conductors, bundled cables, undergrounding, insulation of low voltage lines. Mandating these upgrades provide the best opportunity for tree growth and canopy increase with the proven benefits of urban heat mitigation and health and wellbeing benefits trees provide.

Currently we pay for design and construction of converting uninsulated spans to aerial bundled cabling, which costs above $20,000 per span. Councils directly pay for any network upgrades that safely reduce tree pruning requirements so that electrical safety and tree canopy can be optimised. The proposed review offers no requirement for any network upgrades, and no reprieve for Councils who are currently burdened with the costs to preserve canopy cover.

As Melbourne densifies, there will be a need to add more infrastructure including powerlines. By 2036 we expect our population to grow significantly by another 43,510 people. As more people live in apartments, parks are replacing backyards, and public spaces including streets are becoming the 'living rooms' where people meet and interact. Protecting and growing our street trees is vital for the current and future health and wellbeing of our community.

High density apartments, with three or more stories, make up 55.5 per cent of our housing stock, four times that of greater Melbourne. 35.5 per cent of our housing stock is medium density (semi detached, row or terrace houses, town houses and 1-2 storey flats or apartments). Separate houses make up just 7.7 per cent of the housing stock. Almost all housing development approvals in 2021 (99 per cent) were for new apartments.

Tree canopy loss occurs on public and private land due to housing development. On public land, powerlines and other infrastructure located in the street require upgrades to supply higher density housing developments, and these upgrades affect trees. The volume of space for tree canopy on streets is reduced and existing street trees need to be pruned or removed accordingly. This incremental canopy loss is a significant threat to our street trees and therefore our ability to mitigate the urban heat island effect, locally, and provide green infrastructure to support the vitality and wellbeing of our community.

We strongly advocate you to revise the Electric Line Clearance Review with reforms that actively consider and respond to the impacts of climate change, and the urban heat island effect, and urban densification.

Our comments on specific aspects the Electric Line Clearance Review are as follows.

Trials of reduced minimum clearance spaces

Proposed Regulations: Schedule 1, Part 3, Division 3, Clauses 36–43

Financial considerations for councils

The RIS Section 4 Impact analysis, Criterion 4: Cost to responsible persons Option 3– Targeted changes plus trial (pages 56-57) includes comments of the cost analysis for distribution company participation, but not for local councils.

We have concerns that the administrative burden on Councils to initiate and apply for trials will be significant, particularly with no guidance on what trial options will likely be approved by ESV and electricity distributors. The risk for Port Phillip is in the investment of Council officer resources in trial applications without any certainty of a trial going ahead.

Governance considerations for proposed trials

For a successful trial program, we suggest a clear governance process and appropriate resourcing is required, with a minimum of:

- An independent panel to assess trial applications including an appeals process
- A transparent process for trial approvals, including the order of assessments by distribution companies and ESV
- Specification of what will constitute a minor or a major non-compliance at reduced clearance distances in trials, and what would be an infringeable non-compliance
- The ability to modify a trial rather than a full trial being cancelled, for example, an area being excluded and the rest of the area continuing
- Adequate response timeframes where trials are discontinued. We suggest including scaled timeframes starting from a 90-day minimum with a scale of up to 12 months depending on the number of trees, to enable a suitable period for any rectification work to occur. A mechanism to address any specific urgent work required could be included.

The RIS states trials are the preferred option "*to test a reduced MCS in a controlled and safe way. And provides a way of collecting Victorian specific data that can build the comprehensive evidence base required to support any future changes to standard MCS in the Code"* (page 43).

There is a lack of certainty about what may or may not be approved in a trial, and the requirements for data collection to enable a comprehensive evidence base. There is a significant risk of non-comparable data collection if many small, similar but inconsistent trials are initiated, making the purpose of trials essentially meaningless.

We suggest there are three scenarios which the City of Port Phillip and other metropolitan Councils (with low bushfire risk) are most likely to consider trialing:

1) Reduced minimum distances for structural limbs that are currently managed under the exception clauses.
2) Pruning trees laterally to enable shaping tree canopy around and above low voltage lines.
3) Pruning trees underneath powerlines to manage upward growth.

We propose that a standard suite of trials including data collection requirements is developed by ESV/DEECA for these scenarios. The trials should be pre-approved by ESV and applicable electricity distributors, have standard data collection and reporting requirements and be an opt-in process for eligible Councils. Any trial that includes major limbs or lateral canopy shaping needs to be of sufficient time to allow for tree growth, and we envisage that a trial period of 8-10 years in these circumstances is appropriate.

We recognise that there are other scenarios where trials may be warranted, and suggest that there may be opportunities to develop additional standard trials as well as more bespoke trials; and panel governance should allow for this.

A standard suite of trials has the benefits of:

- Enabling a standardised process for Councils to follow, cutting down the administration burden on Council officers; and
- Enabling for adequate and meaningful data collection on standard trials to be captured, to ensure that data is consistent and has sufficient detail and robustness to determine if a lower MCS distance can be safely applied.

We note that the proposed reforms miss opportunities to promote multi-sector data sharing to improve safety and responsiveness. LiDAR-based inspections are extensive for electricity distributors, but datasets of assets or LiDAR data are not shared. Duplicating data for each Council is expensive and unnecessary. Data sharing could reduce inspection and reporting

labour for all Councils and offer opportunities for consistent and robust data collection. Such data sharing could further strengthen the integrity of standard trials.

If a clear governance process for trials is established, the City of Port Phillip would welcome the opportunity to engage in and contribute to the development of a suite of standard trials.

Electric Line Clearance Management Plans

Proposed Regulations: Regulation 9

Regarding the proposal to change the frequency of Electric Line Clearance Management Plan (ELCMP) preparation to five years, for responsible persons that are not Major Electricity Companies, Council supports the proposal to change the frequency of ELCMP preparation to five years.

Council also supports the changes to terminology used for the requirements under regulation 9(6).

Exceptions to minimum clearance space

Proposed Regulations: Schedule 1, Part 2, Division 1, Clauses 4–7

Council supports the proposed changes to the use of exceptions for structural branches and the removal of requirements to use exceptions to minimum clearance space for small branches.

Environmental considerations

Proposed Regulations: Schedule 1, Part 2, Division 2, Clauses 11–12

Council is supportive of the requirement to keep records of indigenous and significant trees that are cut or removed to make an unsafe situation safe.

Council supports the update in line with best practice for wildlife translocation. However, we would welcome a statement in the regulations for best practice recommendations of what to do instead of translocation of threatened fauna.