

THE CITY OF
GREATER GEELONG

**SUBMISSION
TO THE
REMAKING OF
THE ELECTRIC
LINE
CLEARANCE
REGULATIONS
2026**

—

FEBRUARY 2026

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Executive summary

The City of Greater Geelong welcomes the opportunity to provide a submission on the remaking of the *Electricity Safety (Electric Line Clearance) Regulations 2026*. As Victoria's second-largest municipality and a rapidly growing regional city, Geelong is committed to ensuring public safety while also delivering long-term environmental, climate resilience and liveability outcomes for the community.

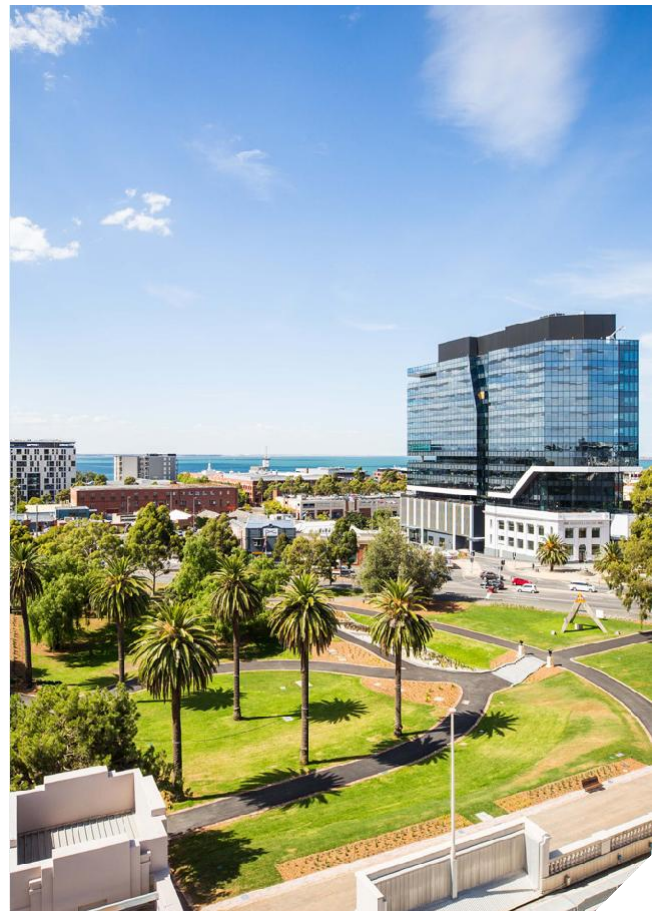
Urban tree canopy plays a critical role in mitigating urban heat, improving public health, supporting biodiversity and enhancing neighbourhood amenity. State planning guidance, including the Victorian Planning Authority's expectation that new precincts achieve a minimum of 30 per cent public-realm canopy cover, reinforces the importance of regulatory settings that enable sustainable canopy retention and growth. Electric line clearance regulations are a key mechanism influencing councils' ability to meet these objectives.

The City broadly supports elements of the proposed Regulations that reduce unnecessary administrative burden and better align responsibility with professional expertise, including extending the review cycle for Electric Line Clearance Management Plans and clarifying the role of qualified arborists in risk assessment and clearance decisions. These changes support more efficient compliance while maintaining safety outcomes.

However, the City has significant concerns regarding aspects of the proposed trial framework for reduced minimum clearance spaces. While the City supports the Electric Line Clearance Consultative Committee's recommendation to reduce minimum clearance distances in Low Bushfire Risk Areas, the draft Regulations lack sufficient detail to provide regulatory certainty. In particular, the absence of defined trial duration, performance metrics, data requirements, post-trial compliance timeframes and dispute resolution mechanisms creates unacceptable operational and commercial risk for councils with limited resourcing.

The City also emphasises the need for vegetation management settings to be evidence-based and proportionate to risk. Excessive or repeated clearance pruning can undermine long-term tree health and may increase structural risk over time, potentially counteracting safety objectives. Improved statewide data collection is essential to inform future regulatory decisions.

Overall, the City calls for a balanced regulatory framework that protects essential electricity infrastructure while enabling sustainable vegetation management, supporting canopy targets, and recognising the operational realities faced by local government. Greater clarity and transparency in the Regulations will be critical to achieving these outcomes and ensuring confidence among responsible persons, arborists and the broader community.



Johnstone Park, Geelong.

Submission

ABOUT THE CITY OF GREATER GEELONG

The City of Greater Geelong (the City) is Victoria's second-largest municipality and one of Australia's fastest-growing regional cities, covering approximately 1,248 square kilometres and serving a population of more than 270,000 residents. The City encompasses a diverse mix of urban, peri-urban and coastal environments, including extensive Low Bushfire Risk Areas with established and growing urban tree canopy located in close proximity to electricity infrastructure.

As a Responsible Person under the Electricity Safety (Electric Line Clearance) framework, the City manages a large and complex tree population within road reserves, public open space and activity centres.

The City undertakes vegetation management in accordance with *AS 4373 Pruning of Amenity Trees* and relies on suitably qualified arborists to assess risk, maintain public safety and retain trees wherever possible. These responsibilities must be delivered within finite operational and financial resources, alongside increasing community expectations regarding canopy retention, climate resilience and environmental protection.

The City's Council has adopted a strong strategic focus on urban canopy, climate adaptation and liveability through its Council Plan and supporting environment and climate strategies. Achieving these objectives requires regulatory settings that are risk-based, evidence-driven and proportionate, and that recognise the operational realities faced by local government. Electric line clearance regulations therefore play a critical role in shaping the City's ability to balance public safety, infrastructure protection and long-term environmental outcomes.

The City welcomes the opportunity to contribute practical, local government experience to the remaking of the Regulations to help ensure they are clear, workable and capable of supporting both safety and sustainability outcomes across Victoria.

URBAN CANOPY TARGETS AND POLICY DRIVERS

The Victorian Planning Authority's guidance for Precinct Structure Plans sets an expectation that new precincts achieve a minimum of 30% tree canopy coverage within the public realm, measured using mature canopy projections, to support urban cooling, liveability and environmental

outcomes (excluding areas set aside for biodiversity and native vegetation conservation).

This target is reinforced by state legislation and policies, including the Local Government Act 2020, the Climate Change Act 2017, and Plan Melbourne 2017–2050, all of which require councils to embed climate resilience, urban cooling, and nature-based solutions in their planning.

At the national level, frameworks such as the National Climate Resilience and *Adaptation Strategy 2021–2025* and the *Nature Positive Plan 2022*, as well as guidelines like *Trees for Cooler and Greener Streetscapes* (DELWP 2019), further underscore the need to expand urban canopy and restore ecological balance across Australian cities.

COUNCIL'S STRATEGIC FOCUS ON CANOPY AND SUSTAINABILITY

The City of Greater Geelong's Council has adopted a strong strategic direction to foster a healthy, liveable, and environmentally sustainable city, as articulated in the *Council Plan 2025–29*, the *Environment Strategy 2020–2030*, and the *Climate Change Response Plan 2021–2030*.

These strategies address climate resilience, biodiversity, public health, and active transport, with trees and green infrastructure serving as crucial elements for success.

Expanding the urban canopy is recognised as central to reducing urban heat, improving air quality, enhancing biodiversity, and creating more attractive, walkable neighbourhoods.

ALIGNMENT WITH STATE TARGETS AND THE ROLE OF VEGETATION MANAGEMENT REGULATIONS

In line with these strategic objectives, increasing urban canopy is a key priority for the City, directly supporting the Victorian Government's target of 30% canopy cover by 2050.

Achieving this target is essential for mitigating climate impacts, supporting biodiversity, and enhancing community wellbeing.

The regulatory frameworks governing vegetation management, including electric line clearance regulations,

have a direct and significant influence on the Cities capacity to deliver these long-term outcomes.

It is crucial that these regulations enable, not restrict, the expansion and maintenance of urban canopy, as they impact the ability to meet state-wide canopy cover targets and broader climate resilience goals.

The City therefore strongly advocates for the proposed *Electricity Safety (Electric Line Clearance) Regulations 2026* to strike a balanced approach between protecting essential infrastructure while enabling the sustainable management and growth of urban forests.

In doing so, these regulations will support Victoria's ambitions for climate resilience, biodiversity, and the creation of healthier, greener communities.

THE PROPOSED REGULATIONS

Please find below the City's response to the questions on key aspects of the proposed Regulations and Regulatory Impact Assessment (RIS) for consideration in the remaking the Electric Line Clearance Regulations.

Electric Line Clearance Management Plans

Do you have any comments on 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?

The City endorses changing the review and update schedule for *Electric Line Clearance Management Plans* to every five years.

This adjustment would greatly lower the unnecessary administrative workload involved in preparing annual plans, while still ensuring safety and compliance are maintained.

Do you have any comments on the proposed changes to the terminology used for the requirements under regulation 9(6)?

The City endorses the proposed terminology changes to Regulation 9(6).

The proposed changes create a clear and concise definition of terms which will reduce inconsistencies in application.

Exceptions to minimum clearance space

Do you have any comments on the proposed changes to the requirements to use exceptions to minimum clearance spaces for structural branches?

The City endorses the proposed redistribution of responsibility from the responsible person to the arborist as this ensures risk assessment is completed by a suitably qualified person.

However in relation to '*Request for information on hazard trees, fall-ins and the need for improved data*' the City has concerns regarding the cumulative structural impacts of excessive or repeated clearance pruning (over-pruning), particularly where minimum clearance space requirements result in substantial canopy reduction or ongoing removal of structural limbs.

Over-pruning can create large wounds, reduce tree vigour and alter canopy architecture, potentially increasing susceptibility to decay and long-term structural weakness. While there is no current dataset demonstrating a direct causal link between compliant pruning and subsequent tree failure, arboriculture principles recognise that repeated high-intensity pruning may contribute to defect development over time.

This raises concern that excessive clearance cycles could inadvertently increase hazard tree formation rather than reduce risk.

Available incident data indicates that vegetation-related fire starts are most commonly associated with fall-ins during severe weather events. In Low Bushfire Risk Areas (LBRA), failures typically occur during extreme climatic conditions that affect all trees, regardless of prior pruning history. This supports a proportionate, evidence-based approach to clearance settings.

The City undertakes pruning in accordance with *AS 4373 Pruning of Amenity Trees* and engages suitably qualified arborists to retain trees safely wherever possible. The City does not hold evidence of systemic failures attributable to compliant pruning; however, improved statewide data collection on pruning intensity and failure causation is required to better inform future regulatory settings.

The City advocates for regulatory approaches that balance safety and reliability with sustainable canopy retention and avoidance of unintended long-term structural decline.

Do you have any comments on the proposed removal of requirements to use exceptions to minimum clearance space for small branches?

The City endorses the removal of requirements for an arborist inspection, assessments of risks and record keeping, as the changes reduce barriers to uptake of the exceptions.

TRIALS OF REDUCED MINIMUM CLEARANCE SPACES

The City does not endorse a trial as presented in the proposed Regulations for Reduced Minimum Clearance Spaces (MCS).

The Cities senior arborist, Sarah Priestley (Coordinator Tree Management) was invited to represent regional Councils perspective as part of the Electric Line Clearance Consultative Committee (ELCCC). The ELCCC proposal, supported by the majority of members, by the ELCCC to reduce the MCS to 300mm is supported by the City.

The Regulations do not codify sufficient detail to enable the City to commit to participation in reduced MSC trials without exposure to significant commercial risk.

The City provides the following responses in the hopes the Regulations can be improved to provide confidence in the trial. Without more detail the City is unable to commit to undertaking a trial.

Do you have any comments on who should be able to participate in a trial?

Any Responsible Person that manages trees within a LBRA should be eligible to take part in a trial, supporting clear and transparent trial process.

Do you have any comments on the period of time that an approval to participate in a trial should be in effect for (trial approval)?

The City does not support the Regulations allowing trial approvals to operate without a specified duration.

Trial approvals should be subject to a clearly defined and time-limited approval period, with explicit commencement and expiry dates.

Specifying a fixed duration is critical to ensuring that the responsible person undertaking the trial can resource the trial appropriately and generate meaningful and reliable results. A defined approval period also supports

transparency, accountability, and consistent risk management for responsible persons, arborists, and affected communities.

To produce meaningful outcomes, a trial should operate for a minimum of 80% of the life of the Regulations, unless the trial approval is suspended or revoked due to non-compliance by the responsible person.

Do you have any comments on actions that could be taken if a reduced minimum clearance space(s) is found to be effective under a trial approval?

The City notes that the Regulations do not prescribe metrics or Key Performance Indicators to assess whether a trial is effective.

While the RIS indicates that reduced MCS may be considered in future iterations of the Regulations, if a trial is successful, the absence of defined effectiveness criteria within the Regulations limits confidence in how trial outcomes will be assessed.

The City considers that trial arrangements should be supported by clearly defined performance measures included in the Regulations to ensure that evaluations are transparent, evidence-based, and capable of informing future regulatory decisions.

Do you have any comments on the 90-day (minimum) period that Energy Safe Victoria must give notice to a responsible person before a trial approval is revoked, or a trial is discontinued?

The City notes that the Regulations do not currently require Energy Safe Victoria to provide evidence to substantiate increased safety risks that may result in the discontinuation of a trial.

The City considers that the inclusion of an evidence-based threshold for trial discontinuation is essential to ensure that regulatory responses are proportionate to risk and supported by objective information.

A 90-day notice period for trial discontinuation, supported by documented evidence, would provide appropriate regulatory certainty. However, the Regulations do not specify when a responsible person would be required to return to full compliance with the standard minimum clearance spaces following discontinuation of a trial.

In the absence of clearly defined post-trial compliance timeframes, there is a risk of unintended consequences, including the imposition of impractical or unachievable compliance obligations within timeframes that do not align

with established vegetation management cycles. If the timeframe to achieve compliance, following discontinuation, is shorter than the City's adopted pruning cycle, the City would be unable to participate in a trial due to resourcing and operational constraints.

The City considers that any trial discontinuation framework should clearly define evidence requirements and post-trial compliance timeframes that are risk-based, proportionate, and aligned with operational realities, to avoid discouraging participation in trials and undermining the policy intent of the Regulations.

Do you have comments on aspects of a trial that might influence the likelihood of your organisation participating?

The City has less than one full-time equivalent resourced to support compliance with the Regulations and a limited budget allocated to these activities. As currently drafted, the trial provisions are insufficiently defined to enable the City to meaningfully comment on, or assess its capacity to participate in, a trial.

In summary, the City has the following concerns regarding the proposed trial framework:

- The geographic areas in which trials may be conducted are not defined.
- The format, scope, and operational requirements of trials are not defined, making it difficult to assess whether participation would be within the City's resourcing and operational capacity.
- The absence of a defined duration for trial approvals creates uncertainty and raises concerns regarding workforce planning, budgeting, and long-term resourcing.
- The lack of a clearly defined timeframe to return to full compliance if a trial is discontinued may present a constraint where required compliance timeframes do not align with the City's adopted pruning cycles.
- A lack of clarity regarding the minimum clearance distances that would apply during trials is concerning, particularly given the City's experience through its participation in the Electric Line Clearance Consultative Committee, which did not provide confidence that Energy Safe Victoria would apply trial settings consistently or in good faith.

- The Regulations do not specify any obligations on Energy Safe Victoria to ensure that trials are fair, effective, transparent, or accessible to all eligible responsible persons.
- There is no dispute resolution mechanism defined in the Regulations to address concerns regarding the conduct or administration of trials by Energy Safe Victoria.

Collectively, these issues introduce a risk of unintended consequences, including discouraging participation by resource-constrained responsible persons and undermining the policy intent of the trial framework.

The City considers that greater regulatory clarity is required to ensure trials are proportionate, transparent, and practically achievable.

Do you have any comments on whether residents should be notified if their local area is participating in a trial?

Residents within the City's local government area regularly raise concerns regarding the extent of vegetation pruning required to maintain compliance with minimum clearance space requirements around powerlines.

The City considers that any reduction in pruning intensity achieved through a trial would be broadly supported by the community and would not require additional, trial-specific notification beyond existing communication processes.

Do you have any comments on the size of an area that a trial approval should apply to?

The City considers that any trial should apply across the entire Low Bushfire Risk Area (LBRA) managed by the responsible person.

Limiting a trial to a small or selectively defined area within urban environments may result in inconsistent outcomes and could create community dissatisfaction or perceptions of inequity among residents outside the trial area.

Applying a trial consistently across the full LBRA provides clearer geographic boundaries, supports equitable treatment of communities, and reduces the risk of unintended community impacts when compared with selectively applied trial areas that lack a clear, risk-based boundary such as those defined for High Bushfire Risk Areas.

Do you have any comments relating to the requirement for councils to have support from the relevant distribution business in order to participate in a trial?

The City does not support this requirement.

Based on the City's experience, the distribution business responsible for the local electricity network has undertaken vegetation pruning that exceeds what is necessary to achieve compliance and is inconsistent with the principles of *AS 4373 Pruning of Amenity Trees*.

When addressed the distribution business has not responded in good faith, resulting in the City reporting issues to Energy Safe Victoria.

The proposed changes risk creating an imbalance of power between two Responsible Persons, creating a conflict of interest that may prevent the City from making formal complaints about the actions of the distribution business.

The City also objects strongly to legislation that provides private entities veto power over how the City as a Responsible Person manages their own assets.

Do you have any comments on the data and information to be reported to Energy Safe Victoria as part of a trial approval?

The Regulations do not define the data requirements for participation in a trial.

In the absence of clearly specified data collection, reporting, and resourcing requirements, the City is unable to assess the implications of the proposed trial arrangements or determine whether it has the capacity to participate.

This lack of regulatory clarity represents a material barrier to participation and undermines the City's ability to provide informed feedback on the proposed trial framework.

ENVIRONMENTAL CONSIDERATIONS

Do you have any comments on the proposed new requirement to keep records of indigenous and significant trees that are cut or removed to make an unsafe situation safe?

Whilst the City supports improved data capture and reporting requirements, as this information may support future planning and monitoring, the proposed changes are considered not feasible to achieve for a number of reasons.

Trees that are indigenous to Victoria: The City currently has over 28,000 locally indigenous trees within the City. To expand this to all trees indigenous to Victoria would capture over 50% of the 190,000 trees within the City,

Trees included in the Victorian Aboriginal Heritage Register: To protect the trees on the Victorian Aboriginal Heritage Register the City is restricted from publishing or sharing information with external parties. This would include contractors undertaking pruning works.

In addition, the proposed Regulations do not specify:

- what mitigation or avoidance measures are expected to be undertaken prior to pruning or removal where threatened fauna habitat is identified; or
- how such measures are intended to satisfy obligations under the Wildlife Act 1975.

Record-keeping alone is insufficient without a clearly articulated fauna protection or mitigation framework.

Do you have any comments on the proposed removal of the requirement to translocate threatened fauna?

The City requests clarification on how the removal of the translocation requirement aligns with the obligations and intent of the:

- *Wildlife Act 1975*
- *Flora and Fauna Guarantee Act 1988*
- *Environment Protection and Biodiversity Conservation Act 1999*.

The proposed Regulations do not provide information on:

- what process is to be followed if a threatened species is detected in a tree scheduled for management during the breeding season
- what mitigation measures, if any, are expected to be implemented in lieu of translocation.

The Victorian Government Department of Energy, Environment and Climate Action (DEECA) guidance indicates that, while translocation of non-threatened wildlife is generally not supported, translocation is an important conservation technique for threatened species.

In some circumstances, it may be the only available mechanism to prevent extinction or to support population establishment or recovery. Such programs require careful planning, implementation, monitoring, and documentation to maximise conservation outcomes.

In the absence of alternative fauna protection measures, there is concern that this proposed change appears to prioritise administrative efficiency in the line-clearance process rather than being driven by advice from the conservation regulator regarding threatened fauna welfare. This could imply that there are no requirements to consider wildlife when undertaking clearance work, resulting in unintended impacts to protected fauna.

Do you have any comments on the change in terminology from ‘cut’ to ‘prune’?

The City supports this change of terminology from ‘cut’ to ‘prune’ as this promotes best practice pruning of trees.

Further the City strongly recommends that the definition of prune be amended to expressly state: ‘includes cutting a part of a tree in accordance with AS 4373 *Pruning of Amenity Trees*’.

This amendment would strengthen the protection of trees, creating a safer healthier environment for our communities.

Do you have any comments on the change to who must assess risks posed by a branch from the responsible person to the arborist?

The City supports the proposed redistribution of responsibility from the Responsible Person to the arborist as this ensures risk assessment is completed by a suitably qualified person.

SUMMARY

The City supports the remaking of the *Electricity Safety (Electric Line Clearance) Regulations 2026* where proposed changes improve regulatory efficiency, reduce unnecessary administrative burden and appropriately recognise professional arboriculture expertise.

However, the City considers that key aspects of the proposed trial framework for reduced minimum clearance spaces lack sufficient clarity and certainty to be workable for local government, particularly in relation to trial duration, performance measures, data requirements and post-trial compliance arrangements.

The City strongly advocates for a balanced, evidence-based regulatory framework that protects public safety and essential electricity infrastructure while enabling sustainable vegetation management and supporting long-term urban canopy and climate resilience outcomes.

The City of Greater Geelong appreciates the opportunity to provide this submission and would welcome further discussion with Energy Safe Victoria and the Department to clarify the intent and operation of the proposed Regulations.



Griggs Creek, Bellarine Peninsula.

REFERENCES

- **Better Environment Sustainability Scorecard (BESS), Ecology 3.1a – Public Open Space.**
<https://docs.bess.net.au/sd-tool-notes/sd1/ecology/3-1a-public-open-space.html>
- **Victoria Planning Provisions, Clause 12.06-1S – Urban forests.**
<https://www.planning.vic.gov.au/planning-schemes/victorian-planning-provisions/state-planning-policy/sustainable-environment>
- **Local Government Act 2020 (Vic).**
<https://www.legislation.vic.gov.au/in-force/acts/local-government-act-2020>
- **Climate Change Act 2017 (Vic).**
<https://www.legislation.vic.gov.au/in-force/acts/climate-change-act-2017>
- **Plan Melbourne 2017–2050** (Victorian Government).
<https://www.planning.vic.gov.au/guides-and-resources/strategies-and-initiatives/plan-melbourne>
- **National Climate Resilience and Adaptation Strategy 2021–2025** (Commonwealth of Australia)
<https://www.dcceew.gov.au/climate-change/policy/adaptation/strategy/ncras-2021-25>
- **Nature Positive Plan: Better for the Environment, Better for Business** (Commonwealth of Australia, 2022).
<https://www.dcceew.gov.au/sites/default/files/documents/nature-positive-plan.pdf>

Trees for Cooler and Greener Streetscapes: Guidelines for Streetscape Planning and Design (DELWP, 2019).
https://www.planning.vic.gov.au/_data/assets/pdf_file/0/031/656257/trees-for-cooler-and-greener-streetscapes.pdf
- **City of Greater Geelong Council Plan 2025–29.**
<https://www.geelongaustralia.com.au/councilplan/default.aspx>
- **City of Greater Geelong Environment Strategy 2020–2030.**
<https://www.geelongaustralia.com.au/environment/article/item/8cbc875c9ea9a7e.aspx>
- **City of Greater Geelong Climate Change Response Plan 2021–2030.**
<https://www.geelongaustralia.com.au/sustainability/documents/item/8d9b3d6e2bec4ce.aspx>
- **AS 4373—2007 (Reconfirmed 2020), Pruning of Amenity Trees.** Standards Australia
- **Victorian Aboriginal Heritage Register (VAHR).**
<https://www.aboriginalheritagecouncil.vic.gov.au/victorian-aboriginal-heritage-register>
- **Wildlife Act 1975 (Vic).**
<https://www.legislation.vic.gov.au/in-force/acts/wildlife-act-1975>
- **Flora and Fauna Guarantee Act 1988 (Vic).**
<https://www.legislation.vic.gov.au/in-force/acts/flora-and-fauna-guarantee-act-1988>
- **Environment Protection and Biodiversity Conservation Act 1999 (Cth).**
<https://www.legislation.gov.au/Series/C2004A00485>

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