

Planning and Consultation Committee Meeting

to be held at the Council Chamber, 32 Civic Drive, Greensborough
on Tuesday 12 August 2025 commencing at 7:00 PM.

Attachments

Carl Cowie
Chief Executive Officer

Thursday 7 August 2025

Distribution: Public

Civic Drive, Greensborough
PO Box 476, Greensborough 3088
Telephone 9433 3111
Facsimile 9433 3777
Website www.nillumbik.vic.gov.au
Email nillumbik@nillumbik.vic.gov.au

Nillumbik Shire Council

 Attachments

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PCC.010/25 Indara Corporation P/L lease proposal for Optus telecommunications infrastructure at Eltham Lower Park

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- Attachment 1. Minutes of the Planning and Consultation Committee Meeting held on Tuesday 8 July 2025

Planning and Consultation Committee Meeting

held at the Council Chamber, 32 Civic Drive, Greensborough
on Tuesday 8 July 2025 commencing at 7:00 PM.

Minutes

Carl Cowie
Chief Executive Officer

Friday 11 July 2025

Distribution: Public

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COM.001/25 Confirmation of Minutes Planning and Consultation Committee Meeting held Tuesday 8 July 2025

Attachment 1. Minutes of the Planning and Consultation Committee Meeting held on Tuesday 8 July 2025

Planning and Consultation Committee Meeting Minutes

8 July 2025

Nillumbik Shire Council

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Nillumbik Shire Council

**Minutes of the Planning and Consultation Committee Meeting held
Tuesday 8 July 2025. The meeting commenced at 7:00 PM.**

Councillors present:

Cr John Dumaresq	Wingrove Ward (Mayor)
Cr Naomi Joiner	Bunjil Ward (Deputy Mayor)
Cr Grant Brooker	Blue Lake Ward (Chairperson Consultation Matters)
Cr Kelly Joy	Edendale Ward
Cr Peter Perkins	Ellis Ward (Chairperson Planning Matters)
Cr Kate McKay	Swipers Gully Ward
Cr Kim Cope	Sugarloaf Ward

Officers in attendance:

Carl Cowie	Chief Executive Officer
Claire Quinlan	Chief Operating Officer
Sally Johnson	Acting Director Governance, Communications and Community Safety
Frank Vassilacos	Director Planning, Environment and Strategy
Jeremy Livingston	Director Culture and Performance
Katia Croce	Manager Governance and Property

1. Welcome by the Chair

2. Acknowledgement of Country

Acknowledgement of Country was read by the Chairperson, Consultation Matters
Cr Grant Brooker.

3. Apologies/Leave of Absence

Nil

4. Declarations of conflict of interest

Nil

Planning and Consultation Committee Meeting Minutes 8 July 2025

COM.001/25 **Confirmation of Minutes Planning and Consultation Committee Meeting held Tuesday 8 July 2025**

Attachment 1. **Minutes of the Planning and Consultation Committee Meeting held on Tuesday 8 July 2025**

Planning and Consultation Committee Minutes

8 July 2025

5. Confirmation of Minutes

COM.001/25 Confirmation of Minutes Planning and Consultation Committee Meeting held Tuesday 10 June 2025

Summary

Confirmation of the Minutes of the Planning and Consultation Committee Meeting held on Tuesday 10 June 2025.

Committee Resolution

MOVED: **Cr Kate McKay**

SECONDED: **Cr Kim Cope**

That the Committee (acting under delegation from Council) confirms the Minutes of the Planning and Consultation Committee Meeting held on Tuesday 10 June 2025 (**Attachment 1**).

CARRIED UNANIMOUSLY

COM.001/25 Confirmation of Minutes Planning and Consultation Committee Meeting held Tuesday 8 July 2025

Attachment 1. Minutes of the Planning and Consultation Committee Meeting held on Tuesday 8 July 2025

Planning and Consultation Committee Minutes

8 July 2025

6. Officers' reports

PCC.008/25 Review of the Road Management Plan

Item: Consultation Matter

Distribution: Public

Manager: Claire Quinlan, Chief Operating Officer

Author: Heath Gillett, Manager Operations Centre

Summary

In accordance with the Road Management Act, Council is required to review its Road Management Plan (RMP) following the election of a new Council. This report outlines the review of current Road Management Plan, and the proposed changes to the new draft plan. The next step in the review process is to advertise via public notice, Council's intent to review its Road Management Plan.

Committee Resolution

MOVED: Cr Kim Cope

SECONDED: Cr Kate McKay

That the Committee (acting under delegation from Council):

1. Authorises the CEO to give public notice of its intention to review the Road Management Plan.
2. Invites public submissions on the Draft Road Management Plan (**Attachment 3**).
3. Notes that any person wishing to make a verbal submission in relation to the Draft Road Management Plan, may do so at a future Planning and Consultation Committee meeting.

CARRIED UNANIMOUSLY

COM.001/25	Confirmation of Minutes Planning and Consultation Committee Meeting held Tuesday 8 July 2025
Attachment 1.	Minutes of the Planning and Consultation Committee Meeting held on Tuesday 8 July 2025
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6.	Consultation Matters
PCC.008/25	Review of the Road Management Plan

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Attachment 1. Minutes of the Planning and Consultation Committee Meeting held on Tuesday 8 July 2025

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8 July 2025

6. Officers' reports

PCC.009/25 Diamond Creek Dog Park Upgrade - Final Design Endorsement

Item: Consultation Matter

Distribution: Public

Manager: Claire Quinlan, Chief Operating Officer

Author: Stewart Broussard, Manager Recreation and Leisure

Summary

This report seeks Council's endorsement of the Diamond Creek Dog Park upgrade final concept plan following community consultation.

Committee Resolution

MOVED: Cr Peter Perkins

SECONDED: Cr Kelly Joy

That the Committee (acting under delegation from Council):

1. Notes the changes made to the draft concept plan.
2. Endorses the final concept plan (**Attachment 1**) for the purpose of appointing a contractor to deliver works.

CARRIED UNANIMOUSLY

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PCC.009/25	Diamond Creek Dog Park Upgrade - Final Design Endorsement	

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Planning and Consultation Committee Meeting Minutes

8 July 2025

7. Supplementary and urgent business
- Nil
8. Confidential reports
- Nil
9. Close of Meeting

The meeting closed at 7.10pm.

Confirmed:

Cr

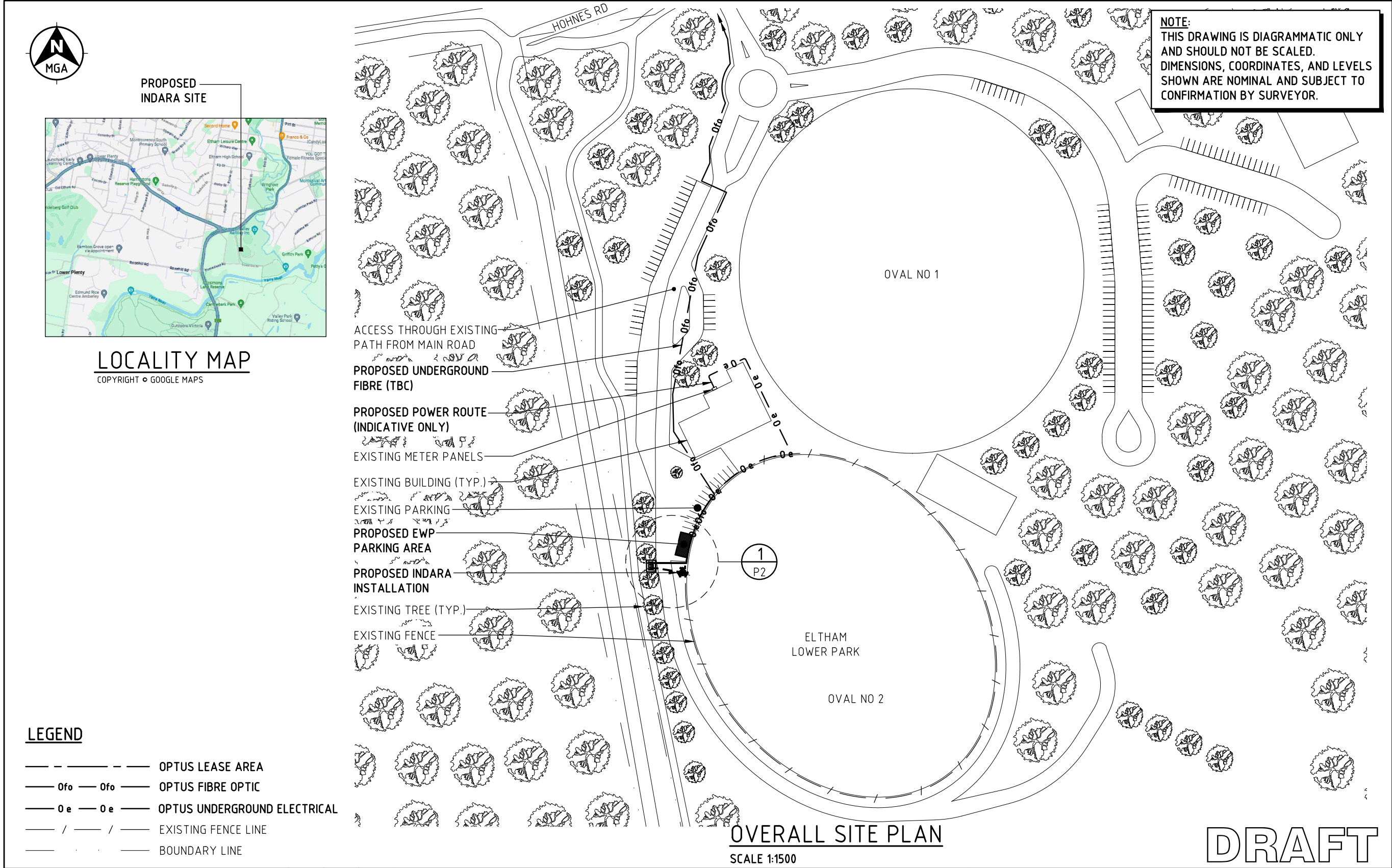
Chairperson Planning Matters

Cr

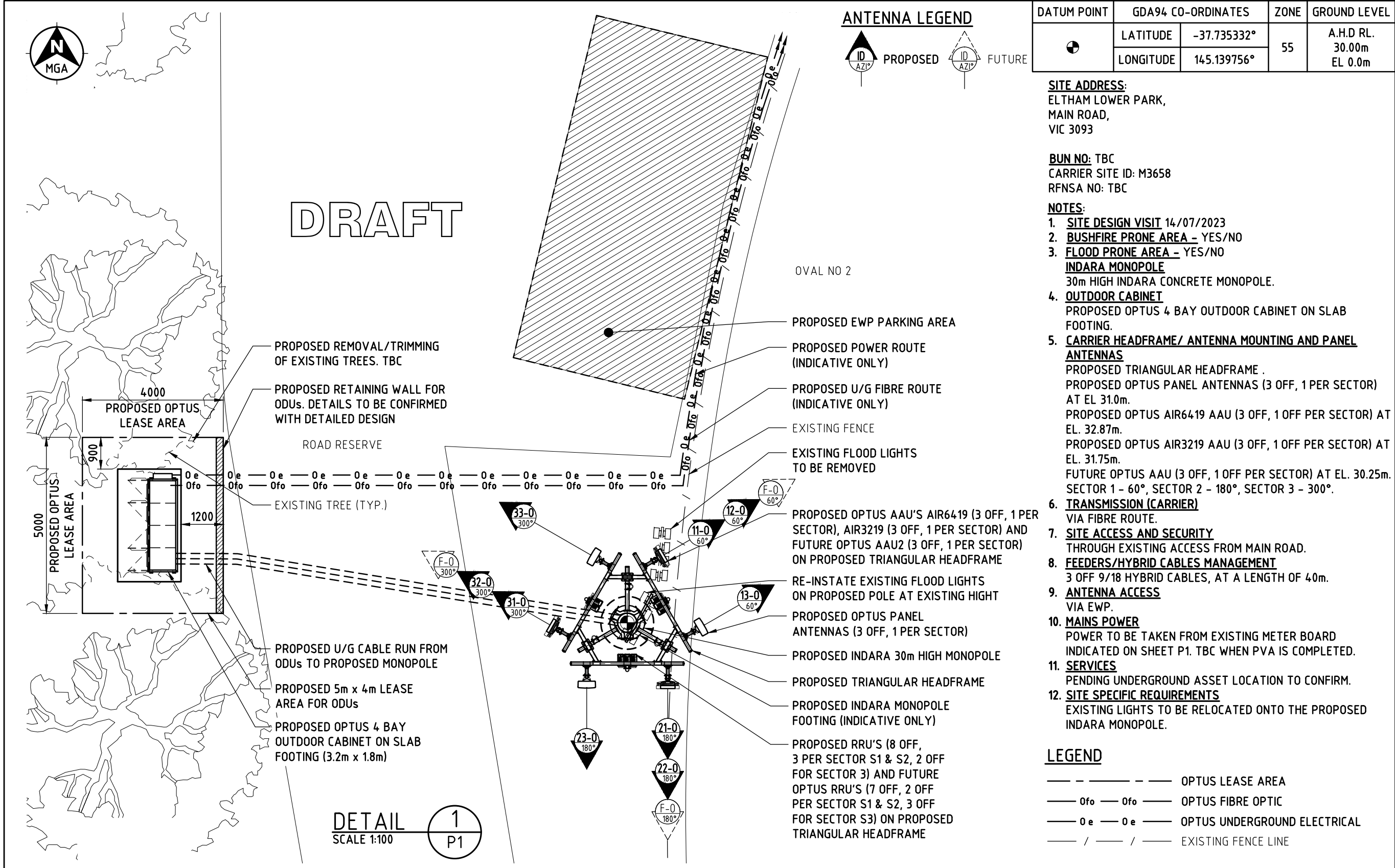
Chairperson Consultation Matters

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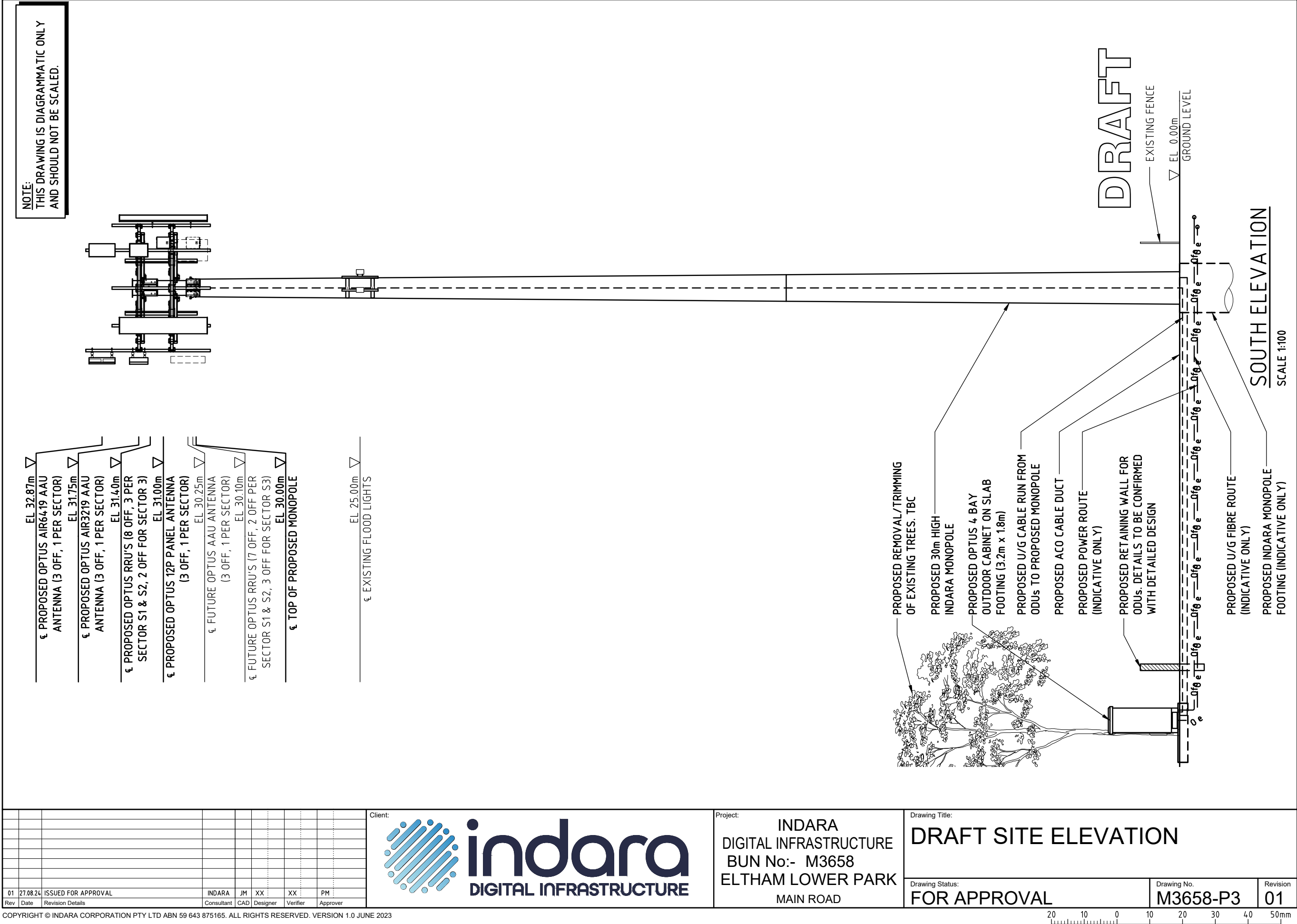
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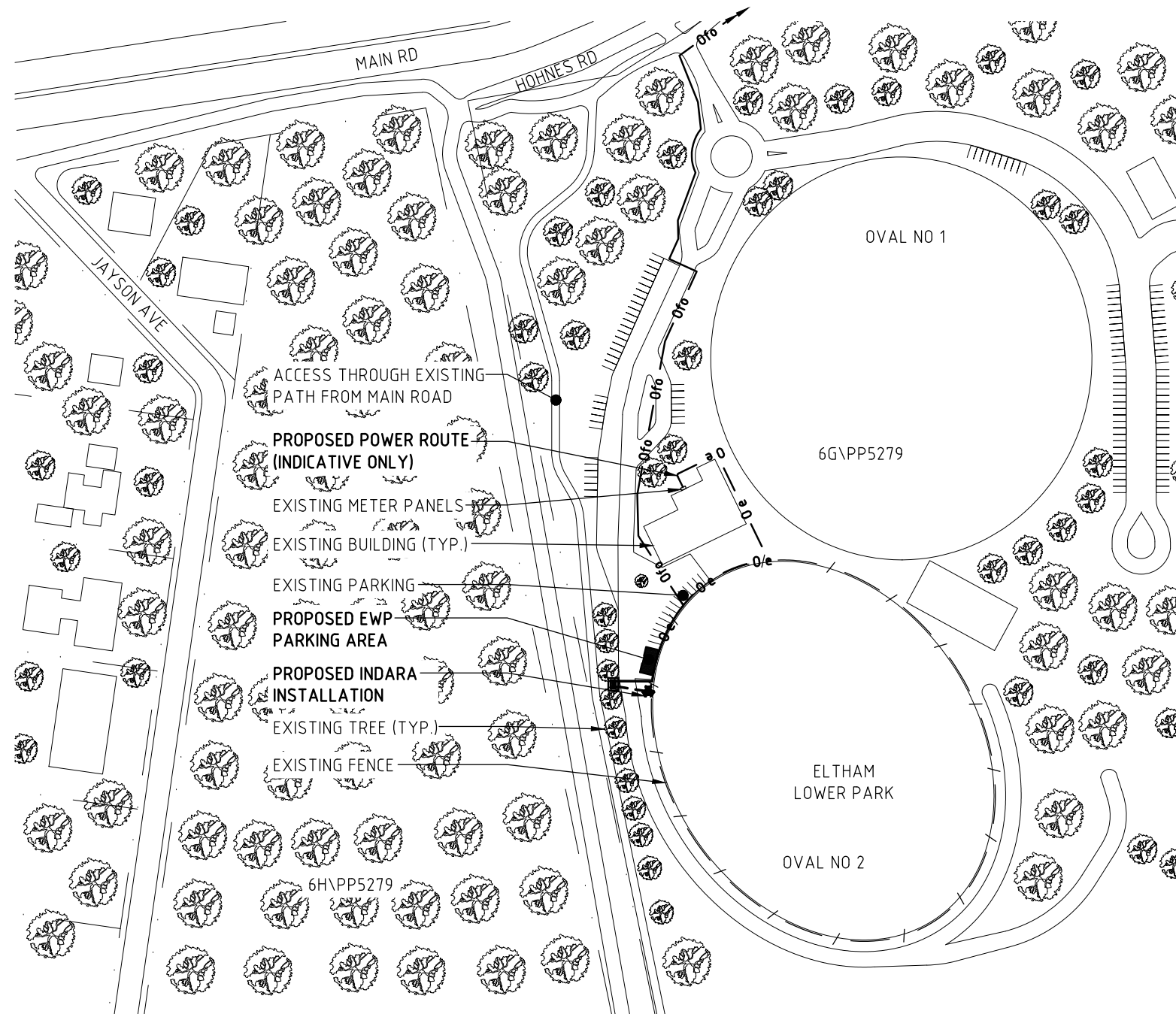


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																	Drawing Status:			Drawing No.			Revision	
																	FOR APPROVAL			M3658-P1			01	



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LEASE PLAN
SCALE 1:2000

DRAFT

01	27.08.24	ISSUED FOR APPROVAL		INDARA	JM	XX	XX	PM	
Rev	Date	Revision Details		Consultant	CAD	Designer	Verifier	Approver	

Client:	
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Project:	
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Project: **INDARA**
DIGITAL INFRASTRUCTURE
BUN No:- M3658
ELTHAM LOWER PARK
MAIN ROAD

Drawing Title:	
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LEASE PLAN

Drawing Status:

FOR APPROVAL

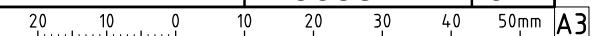
Drawing No.

Drawing No.
M3658-L1

Revision

01

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ID	Q1. Are you supportive of Council entering into a lease with Indara Corporation P/L for a mobile telecommunications infrastructure to be installed at 570-576 Main Road, Eltham - known as Eltham Lower Park?			Q2. If no or unsure, explain your reason	Q3. Have you ever struggled with poor internet or mobile connectivity?		Q4. Would you like to provide a location of where this has occurred?
	Yes	No	Unsure		Yes	No	
1391	1					1	
1392		1		Damage to natural surrounds and visual impact. This green space is not an appropriate location for such an imposing tower.	1		
1393	1					1	
1394	1				1		Main Road, Eltham
1395	1					1	
1396	1					1	
1398	1				1		Marrakai Crt, Eltham North
1401	1				1		Griffith Park
1427		1				1	
1429	1				1		Closer to Woodridge Estate area.
1430		1		I don't think it belongs in an area where people, especially children, gather and spend time to play sports, picnic or use the playgrounds		1	
1434	1				1		Clearwater Close, Eltham

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	Yes	No	Unsure		Yes	No	
1436		1		This proposed tower is far too close to a nationally threatened Eltham Copper Butterfly population. There is scientific evidence that electromagnetic radiation, including frequencies used in 5G technology, may negatively affect insects. If the proposal goes ahead, I will be referring it to the federal government as a potential breach of the Environment Protection and Biodiversity Conservation Act.	1		no
1437			1	Optus maps show that only standard 5G is an issue in the area. Telstra shows that it has an issue with 5G in the area. The Optus tower MUST be able to support Telstra (and Vodafone?) antennas. I dont want to see 2 or more antennas in the area, when only one is needed.		1	
1439			1	This infrastructure will only improve reception for Optus and Optus networked customers. Telstra and Vodafone customers will see no benefit from this tower.	1		Fairdale Court, Eltham
1440	1				1		Marlow Place, Eltham
1441		1		Intrusive eyesore disturbing the solitude of a lovely piece of nature			
1442	1				1		Metery road Eltham
1443	1					1	

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	Yes	No	Unsure		Yes	No	
1444	1				1		█ Pitt st Eltham
1445	1				1		Pitt Street, Eltham
1446	1				1		Bushland Court Eltham
1449		1		We attend the playgroup nearby and don't know it's effects.	1		
1450		1		Too close to children's playhouse and playground. Retracts from beauty of the area. Sufficient phone coverage already.		1	
1451		1		Too close to many childrens' facilities!		1	
1453		1		To close to the lower eltham park n the play centre my grand child attends..			
1455		1		Too close to Hobbes Road Playhouse.		1	
1456		1		Children's facility Hoanes road is 200m nearby concerns of potential carcinogen of RF-EMF exposure from the tower.		1	
1457	1				1		Pavilion ELC
1459	1				1		Eltham Lower Park
1460	1				1		I frequently experience poor wireless coverage on my property in Lavender Park Road

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	Yes	No	Unsure		Yes	No	
1463		1				1	
1464		1		I do not support this. Close to parks where children play, sports grounds & a playgroup that children attend weekly. It's not safe, especially for children, to be close to & exposed to telephone towers particularly on a frequent basis. If this is installed, I will no longer attend the Hohnes Road Playgroup or visit the parks at Eltham Lower.		1	
1465		1		The Lower Eltham park is a treasured green wedge of the community. Hundreds of people visits the park on a daily basis, let alone days when the miniature trains are running and then there would easily be 1000 people visiting the park. The majority of these visitors are children! Whom should not be exposed to any potential negative health risks. Further, the visual landscape of the area is of utmost importance, LEP is a breath of fresh air and true iconic area. Adding an unsightly tower to the area would destroy the visual landscape. We strongly oppose a tower being built at lower Eltham park.		1	

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	Yes	No	Unsure		Yes	No	
1466		1		I live right near here and do not have any coverage issues, it seems drastic and unnecessary in the circumstances, would be an EXTREME eyesore and health hazard for the area, and would detract from the natural beauty of the surrounds		1	
1467		1				1	
1468		1		No need for it. Harmful to our health. Harmful to our children. You are actively creating and bring harm to everyone, including human, animals and the environment		1	
1469		1		Not next to a kids playground! NO	1		Not next to a playground
1471		1		Because there has been no environmental study regarding how it may affect the copper butterfly. Plus, the impact on the developing human brain and there is a child's play area there.		1	
1477		1		Cost and location		1	
1479		1			1		
1480	1				1		Eltham
1481	1				1		
1486	1				1		Leonard cres eltham

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	Yes	No	Unsure		Yes	No	
1487		1		I don't believe it is warranted. It does affect health. There will always be spots as we live in hills. I don't always believe proposals are always in our best interest more that of the stakeholders and shareholders profit margins before well being		1	
1492	1				1		Marlow Place Eltham
1498	1						
1501	1				1		Valley park road
1502		1		Last unspoilt green area in Eltham		1	
1504	1				1		Sheffield Street Eltham

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	Yes	No	Unsure		Yes	No	
1505		1		I do not think it is appropriate to have the tower installed here, close to sporting fields and also the Hohnes Hill Environmental Reserve - one of the homes of the Eltham Copper Butterfly. And also it's close proximity to the Lenister Wetlands the junction of the Yarra River and Diamond Creek. These areas are home to native animals, some who are listed as vulnerable. I have seen platypus, sugar gliders, swamp wallabies, long neck turtles, pobblebunks, paschal etc here and the back area of Eltham Lower Park is listed as a conservation area. The area is not suitable for this sort of tower. It should be placed in a built up area away from the park not near sporting ovals, miniature train and playgrounds too. I also live very close to this area and have done so since 1994. We do not have frequent drop outs or problems with out internet or mobile phones at all in this area. None of my neighbours do either. I have spoken to many local people and none of them experience problems with coverage.		1	
1506		1		I really do not think it's necessary and it will spoil the area.		1	

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	Yes	No	Unsure		Yes	No	
1507		1		Because it is a part next to a park setting and in Eltham this large structure looks awful and not a thing like the park and area .		1	

1508			1	<p>I have been contacted by people with environmental concerns regarding the Eltham Copper Butterfly colonies on Hohnes Hill and the impact of the tower on this insect and others in the vicinity of the tower. I was involved in the original Copper Butterfly campaign last century. I have not read any current scientific information regarding the impact of radio waves on insects nor do I have accurate and current information about the size and viability of the 2 recent colonies that have been found there. I would anticipate that Council staff hold this information but from the report, I do not see that these concerns have been considered. I think that this potential issue should, at least be investigated, and the findings made part of an amended Officers Report so that the public can understand this proposal more fully.</p> <p>If it is found that the current potential location of the tower has a detrimental environmental effect, an alternative location, even within the park, should be considered. I am assuming that any changed location will again have other adverse effects and therefore cause other concerns such as extra cost, the visual impact within the park etc. and a final decision will have to weigh up all these concern and rank them in order of priority.</p> <p>I recognise the need for improved telecommunications to cope with current use and for the increase in Nillumbik's future population however the community now needs to be satisfied that all issues have been considered.</p>	1		Nearby the Ampol service station
1511		1		TOTALLY in-appropriate to put a tower in a park where children can play ,		1	
1512		1		Don't want any removal of trees and any development at this site neat the library,trestle bridge,creek		1	

1513		1		<p>I don't support the proposed lease of an Indara Mobile Tower at Eltham Lower Park.</p> <p>In summary, it is not appropriate for the site and needs relocation. My objection is detailed, comprehensive, and contains research and supporting documentation. It will not fit the allowable word limit here. Therefore, I will submit an additional written document to Natalie Campion, Coordinator Property, to accompany this feedback.</p> <p>My objections fall under the following headings, with brief explanations of main issues. A more detailed discussion paper will follow:</p> <p>1) Lack of due diligence, defective community consultation, incongruent information Indara has breached: INDUSTRY CODE C564:2025 MOBILE PHONE BASE STATION DEPLOYMENT Section 6.1.9- Detailed Information. The public consultation process legally required by Indara and Council, has been compromised.</p> <p>2) Lack of Precautionary Approach/Risk Aversion in relation to the full Environmental Impact Lack of Environmental Impact Study, and consideration of planning overlays, to assess risk to sensitive environment/biodiversity. Specifically, endangered Eltham Copper Butterfly colony, federally protected by the EPBC Act 1999, housed 50m away.</p> <p>3) Inadequate consideration of the possible impacts to Human Health specifically Children Reliance on one ARPNSA factsheet is inadequate and excludes other current research findings and codes.</p> <p>4) Lack of consideration for an area of Cultural Heritage Sensitivity Lack of consultation with Wurundjeri Corporation and Elders over 'Culturally Sensitive' land.</p> <p>5) Negative Visual Impact Negative visual impact of a 32.87m high tower, on the natural environment and open space.</p> <p>6) Public Crown Land being used for Private Gains A private company should not gain profits on public Crown Land.</p>		1	
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	Yes	No	Unsure		Yes	No	
1514		1		<ul style="list-style-type: none"> • While we support the provision of telecommunications equipment that provides safety for the community, we do not support the proposal for a telecommunications tower within ELP based on the available information provided by Council. • Council needs to develop a rigorous strategy which examines the best practice provision, location and integration of services and utilities across the entire municipality (including telecommunications towers) to avoid the risk of ad hoc and poorly informed decisions that may degrade Nillumbik's environmental credentials. • Public open space is vital, necessary and incredibly valuable to the community and decisions to manage this land must be undertaken with the utmost care. • There has been insufficient information that clearly explains the nature of the black spot problem and the reason why the proposed location of the telecommunications tower within ELP is suitable. • This lack of available information makes it difficult for both Council and the public understand the proposal and make informed and transparent decisions. • There may be other locations outside ELP that provide the necessary telecommunications coverage without impacting the high environmental and recreational values of ELP, including along Main Road where many existing services and utilities are already located. • Given the high environmental and ecological values of ELP as well as the park being located within an Environmental 		1	

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	Yes	No	Unsure		Yes	No	
				<p>Significance overlay within the Nillumbik Planning Scheme, it is very important that Council's Environment and Sustainability department review the proposal and offer guidance on the suitability of the proposed location(s).</p> <ul style="list-style-type: none"> • A current master plan for ELP would greatly assist Council when reviewing the suitability and proposed location of services (including telecommunications towers) and whether such proposals may adversely affect the ecological and recreational values of ELP. • The current proposed location of the telecommunications tower reflects poorly on Nillumbik as the Green Wedge shire. • The proposed location of the tower and associated infrastructure is very close to Hohnes Hill Reserve. The view of this reserve from ELP is majestic and important - the proposed tower will adversely impact this experience. The reserve has several significant flora and fauna species including the endangered Eltham Copper butterfly. • Any proposal to privatise this public land should be very carefully considered, as once privatised, this land will become difficult to return to public usage. • Allowing private businesses to lease public land within an important public park such as ELP without demonstrating beneficial outcomes for the community is concerning and sets a dangerous precedent that may allow further telecommunications infrastructure to be located within ELP in the future. • Council may not be best placed to negotiate suitable leasing arrangements with telecommunication companies. 			

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	Yes	No	Unsure		Yes	No	
				<ul style="list-style-type: none"> • The proposed lease agreement should be independently assessed to confirm whether the proposal rent is commensurate with the current commercial market value for such lease agreements. • Locating telecommunications towers on public land managed by Council should not be a cheaper and easier alternative for Telcos to avoid higher rents on privately owned property adjacent to ELP. • Because ELP is so loved by the community and is looked after by several committed volunteer community groups, Council should consult widely and with all park users. • Eltham Lower Park required a strong voice of its own that ensure the park is treated with the necessary care respect, kindness and generosity it deserves. • No existing trees and/or vegetation within ELP should be removed to accommodate this proposal. 			
1515		1		Independent experts and studies recommend a precautionary distance of at least 300 to 400 metres from residential homes, especially from home with young children. This is based on findings that radiation levels tend to be significantly higher within this range. This concerns us as we have young children.		1	

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	Yes	No	Unsure		Yes	No	
1517		1		1.Eltham Lower Park is on the OUTSKIRTS of Eltham , the tower should be closer to where better reception is needed .There is plenty of other parkland such as Wingrove park, etc . HOW did Optus decide that this proposed location of the tower is "central"? 2. The evidence on the effect on our health from electromagnetic energy emitted by base station antennas is NOT conclusive		1	
1518		1		It appears to encroach on existing parking spaces & will be an eyesore. A public park/ green space is not the place for a sodding great telecoms tower.	1		Arthur Street

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	Yes	No	Unsure		Yes	No	
1520		1		<p>Telecommunications Infrastructure at Eltham Lower Park: Indara Lease Proposal</p> <p>Submission by [REDACTED], Co-Convenor, Friends of the Eltham Copper Butterfly (FoECB)</p> <p>I object to the proposed mobile telecommunications tower at Eltham Lower Park (ELP). This submission outlines:</p> <p>Background on the adjacent Eltham Copper Butterfly (ECB) colony at Hohnes Hill</p> <p>Legislative protections under the EPBC Act 1999</p> <p>Evidence on potential impacts of 5G radio-frequency emissions on insects</p> <p>Objections to the proposed tower location</p> <p>Context</p> <p>1(a) ECBs at Hohnes Hill Reserve</p> <p>Hohnes Hill Flora Reserve is adjacent to the proposed tower site. ECBs were first recorded here in 1988. A 2014 Nillumbik Council flora and fauna report noted no sightings for over a decade. However, ECBs were rediscovered in December 2021 by local</p>	1		Eucalyptus Rd, Eltham

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	Yes	No	Unsure		Yes	No	
				<p>ecologists in a previously unrecorded area of the reserve, along a track within 20 to 50 metres of the ELP fence line.</p> <p>Larval counts in September 2022 identified 17 larvae on 8 plants. Following extensive habitat restoration and further monitoring by Council and community groups, the population recovered to 243 larvae on 80 plants in the 2024 spring survey, making Hohnes Hill a significant ECB colony.</p> <p>1(b) EPBC Act and ECBs</p> <p>The ECB (<i>Paralucia pyrodiscus lucida</i>) is listed as threatened under the EPBC Act. Under Sections 68-70 and 75, any action likely to have a significant impact on a listed species must be referred to the Commonwealth Minister for the Environment.</p> <p>Significant impacts include:</p> <p>Long-term population decline</p> <p>Reduced area of occupancy</p> <p>Habitat modification or degradation</p> <p>Breeding disruption</p> <p>Fragmentation of populations</p>			

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	Yes	No	Unsure		Yes	No	
				<p>1(c) Scientific Evidence of Insect Susceptibility to 5G EMR</p> <p>While human impacts from 5G are generally regarded as low, multiple studies show insects are more vulnerable to radio-frequency electromagnetic radiation (RF-EMR), particularly in the 6–120 GHz range. Insects absorb more energy due to:</p> <p>Smaller body size and high surface-to-volume ratio</p> <p>Resonance effects at higher frequencies</p> <p>Lack of thermoregulation</p> <p>Reliance on electromagnetic cues for orientation</p> <p>The ECB and its attendant ant, <i>Notoncus capitatus</i>, may be affected through disruption of development, reproduction, or behaviour due to RF-EMR exposure.</p> <p>1(d) The Precautionary Principle</p> <p>Embedded in Section 3A(b) of the EPBC Act, the precautionary principle holds that scientific uncertainty is not a reason to delay preventive measures where there is risk of serious or irreversible environmental damage. This principle must guide decisions involving threatened species.</p>			

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	Yes	No	Unsure		Yes	No	
				<p>Objections to the Proposal</p> <p>Objection 1: Risk of Significant Impact on ECBs</p> <p>The proposed tower site is ~100 metres from known ECB larvae habitat. Studies suggest RF-EMR may cause heating and behavioural effects in insects, potentially threatening ECB reproduction and survival. This risk meets the criteria of "significant impact" under EPBC guidelines. The proposal should not proceed in this location.</p> <p>Objection 2: Failure by Developer to Refer Proposal under the EPBC Act</p> <p>Indara has not referred the proposed action to the Commonwealth for assessment. Under the EPBC Act, referral is mandatory if there is a real chance of significant impact. Construction should not proceed until such referral is made.</p> <p>Objection 3: Failure by Land Manager (Council) to Refer Action</p> <p>Nillumbik Shire Council, as land manager, shares responsibility to refer actions that may significantly impact a listed species. No referral has been made. Until this occurs, the Council should not authorise or enable construction.</p>			

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	Yes	No	Unsure		Yes	No	
				<p>Objection 4: Inadequate Policy Context in Officer Report</p> <p>The Officer's Report to Council lacks proper assessment of:</p> <p>The Environmental Significance Overlay (ESO) applicable to Hohnes Hill</p> <p>Alignment with Council's Biodiversity Strategy 2024–34, including Objective 1.1 on integrating biodiversity into decision-making</p> <p>These omissions suggest limited internal consultation and insufficient attention to environmental risk. The report does not meet expectations for ecological responsible governance.</p> <p>Conclusion</p> <p>Given the potential for adverse effects on a nationally threatened species, the proposed tower at ELP should not proceed in its current location. The precautionary principle, legal obligations under the EPBC Act, and Council's own biodiversity commitments require that this proposal be paused and subject to further assessment, including formal Commonwealth referral.</p>			

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	Yes	No	Unsure		Yes	No	
1521		1		<p>██████████ writing as Convenor of Friends of Biodiversity Hohnes Hill.</p> <p>Important background information: Hohnes Hill reserve is an extremely significant reserve in Nillumbik.</p> <p>It is situated less than 100 metres from the proposed site.</p> <p>Hohnes Hill protects many indigenous species, including several Federally listed as endangered. These demand specific protections under the Federal EPBC Act (Environment Protection and Biodiversity Conservation). One of these species is the iconic Eltham Copper Butterfly (ECB). The ECB has a complex life cycle in association with particular ants, and the local plant, Sweet Bursaria. The soil microbiome is a critical part of the equation.</p> <p>There are substantial policies that need to be adhered to, to ensure the health of their populations.</p> <p>Friends of Biodiversity Hohnes Hill has been described by Nillumbik Shire Council as Nillumbik's outstanding Friends Group, with excellent participation and ecological methodology, high levels of community connection, and impressive outcomes in ecosystem repair.</p> <p>FoBHH has been working with a focus on improving habitat for</p>	1		

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				<p>the ECB and other insects. ECB surveys have demonstrated a remarkable increase in the reserve's population and Hohnes Hill now provides for, and protects, one of the significant populations of ECB within Nillumbik. The work carried out by the Friends Group is coupled with work undertaken by Council's land management contractor.</p> <p>It is important to note that the riparian zone around the Diamond Creek is also invaluable habitat. It is a crucial linking system – a habitat corridor that demands care and ongoing repair. Among others, a colony of Imperial Hairstreak Butterflies relies on this area.</p> <p>Flora and fauna have been impacted by urbanisation, and we have an obligation to ensure they do not suffer any new threats. Reversal of decline is must be achieved. The safeguarding or return of very uncommon species must be actioned.</p> <p>Research indicates electromagnetic radiation (EMR) from towers such as the one proposed, has a negative impact on insects.</p> <p>Indirectly, this also impacts other fauna – birds, phascogales, gliders due to reductions in food availability.</p> <p>Research also indicates EMR affects the soil microbiome which is critical to every aspect of life.</p>			

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	Yes	No	Unsure		Yes	No	
				<p>Questions are raised regarding Council's processes in response to the proposed project, and what structures are in place to ensure all EPBC and other obligations have been addressed.</p> <p>Is the precautionary principle being applied?</p> <p>How has Council's Biodiversity Strategy informed the process?</p> <p>There is insufficient detail regarding the type of proposed antenna (this influences the radiation output).</p> <p>There is insufficient detail regarding the black spot area.</p> <p>There is insufficient detail regarding how far a tower such as the one proposed will 'reach' and therefore which part of the black spot will be addressed.</p> <p>There is insufficient information regarding what alternative sites were investigated.</p> <p>There are many concerns regarding planning policy, Council processes, EPBC Act and regulations, and more.</p> <p>While I understand that having mobile connectivity is important to people in the community, these issues must be scrutinised. Alternative scenarios must be presented, along with rigorous investigation into all potential impacts, accountability to Federal and local policy, and responsible stewardship on behalf of the</p>			

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	Yes	No	Unsure		Yes	No	
				<p>Nillumbik community and beyond.</p> <p>Here are a few snippets from recent research papers:</p> <p>Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach: “There is enough evidence to indicate we may be damaging non-human species at ecosystem and biosphere levels across all taxa from rising background levels of anthropogenic non-ionizing electromagnetic fields (EMF) from 0 Hz to 300 GHz. The focus of this Perspective paper is on the unique physiology of non-human species, their extraordinary sensitivity to both natural and anthropogenic EMF, and the likelihood that artificial EMF in the static, extremely low frequency (ELF) and radiofrequency (RF) ranges of the non-ionizing electromagnetic spectrum are capable at very low intensities of adversely affecting both fauna and flora in all species studied. Any existing exposure standards are for humans only; wildlife is unprotected, including within the safety margins of existing guidelines, which are inappropriate for trans-species sensitivities and different non-human physiology. Mechanistic, genotoxic, and potential ecosystem effects are discussed.” and “...signify serious potential effects from cell phones/infrastructure and WiFi devices to all similar size insect species.” and “Ants also react adversely to RFR (109–111). Cammaerts et al.</p>			

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	Yes	No	Unsure		Yes	No	
				<p>(111) found that memory and association between food sites and visual/olfactory cues in ants (<i>Myrmica sabuleti</i>) was significantly inhibited, with memory eventually wiped out altogether, from exposures to GSM-900 MHz signal at 0.0795 $\mu\text{W}/\text{cm}^2$. A cumulative effect was seen even at very low intensity with subsequent exposure. The exposed colonies' overall condition eventually resembled that of honeybee (<i>Apis mellifera</i>) colony collapse disorder. The researchers concluded that exposures common to cell phones/towers and other transmission sources are capable of disastrous effects on a wide range of insects that rely on olfactory and/or visual memory, including bees."</p> <p>B Blake Levitt, National Association of Science Writers, Berkeley, CA, United States; Henry C Lai, Department of Bioengineering, University of Washington, Seattle, WA, United States; Albert M Manville II, Advanced Academic Programs, Krieger School of Arts and Sciences, Environmental Sciences and Policy, Johns Hopkins University, Washington, DC, United States</p> <p>Effect of Mobile Tower Radiation on Microbial Diversity in Soil and Antibiotic Resistance</p> <p>"Our findings suggest that mobile tower radiations can significantly alter the vital systems in microbes and turn them multidrug resistant (MDR) which is most important current threat to public health".</p> <p>Antim Bala Sharma, Dr. OS Lamba, Department of E&C, Suresh Gyan Vihar University, Dr. Lokendra Sharma, Department of Pharmacology, SMS Medical College and Hospital Dr. Abhishek</p>			

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				Sharma, Public Health Dentistry, RUHS College of Dental sciences Jaipur, Rajasthan, India presented at 2018 International Conference on Power Energy, Environment and Intelligent Control)			

Natalie Campion

From: [REDACTED]
Sent: Sunday, 22 June 2025 9:08 PM
To: [REDACTED]
Subject: Filed: Telecommunication tower in Eltham lower Park [REDACTED]
Attachments: Phone tower [REDACTED] submission.docx

[REDACTED]
Please find attached [REDACTED] submission regarding the
telecommunication tower in Eltham Lower Park.

We have tried to use the Participate Nillumbik site tonight, with much frustration and without
success, so have resorted to email. Hopefully you will accept our emailed submission.

Kind regards

[REDACTED]

1. We understand that with the projected population increase and residents' reliance on telecommunication, changes are inevitable and change will always cause discussion.
2. From general conversation amongst residents over the years, telecommunication is not reliable in this part of Eltham.
3. It is probable that Telstra will be able to access the tower at some stage. Those 2 Telcos - Optus and Telstra - are the most widely used.
4. The terms of the lease state that the time period will be set at 10 years plus another 10, with a payment review only in 10 years. Whilst this time period is satisfactory and realistic for the existence of the tower in the park, to link the time period to the financial review to only 10 +10 years is not. Despite the 3% annual increase in rent, a review should occur each 5-year period in order to link the sum more closely to market rental.
5. The location close to the pavilion and using the location of an existing light pole/structure appears to be a practical solution.
6. We are aware of residents voicing environmental concerns over the two recently discovered colonies of Eltham Copper Butterfly in Hohnes Hill. ECAG does not have the knowledge to assess the impact of the phone tower on butterflies. The Officers Report does not show if environmental concerns were considered and rejected, or whether they were considered at all.
7. Moving a communications tower to other parts of the park may impact on the current use and enjoyment of the park by local residents.
8. The built form of infrastructure associated with the tower, if relocated, may impact on the visual appearance of the park. Already the current trend of wooden fencing is making the park more 'urbanised' than post and wire fencing which is less obtrusive.
9. Relocating the tower and its infrastructure may also impact on the tree canopy in the park. We are unaware of the exact bushfire regulations associated with such infrastructure but are concerned at the possible impact, depending on the site selected, of relocation.
10. The importance of retaining tree canopy is now well known and, given increased use of the park in years to come, should be preserved.

22 June 2025

nillumbik@nillumbik.vic.gov.au

Proposed lease to Indara Corp. for telecommunications infrastructure at Eltham Lower Park

I do not support a proposed lease of land to locate a telecommunication tower and associated infrastructure in Eltham Lower Park. My concerns and suggestions are:

Location

The proposed location would make this tower highly visible, as it is close to various sporting facilities, the popular shared Diamond Creek Trail and Hohnes Road. It would be in the line of sight for anyone entering the park and it would impact the visual amenity for many park users, as well as compromise the extensive public open space within Eltham Lower Park.

If Council should consider approving a lease for such infrastructure, I suggest it replace the current oval light pole, south of the cricket nets, on the east side of the sporting ovals, so it would not be as visually intrusive and would be more remote from high activity areas, including the Diamond Creek Trail and Hohnes Road. As stated in the Council officer's report *'Initial consultation occurred on both locations, and internal feedback at the time was that the location on the east side of the oval near the Dog Park was preferred so it was away from the main park area and not so visible.'* Installation or maintenance costs estimated by the applicant should not be a factor in Council agreeing to a site location. It is also suggested this pole be painted green to help blend with the treed background.

Revenue

I consider the proposed rental of \$25,000 per annum to be insufficient for the detrimental use of, and impact on this public open space, as well as the value add opportunities being created for Indara Corporation Pty Ltd. The proposed figure is based on current market rent for this prime location. It does not appear to consider increased revenue by the applicant when such a tower will (most likely) also be used to carry pole mounted and base station infrastructure for other mobile operators such as Vodafone/TPG, NBN co., and Telstra. It is also possible various state and federal government entities, including emergency service providers and wireless broadband data service providers, may utilise such a monopole and ground area.

If Council is to agree to such infrastructure, then I believe there should be additional co user rental fees included, to cover future user's base stations and pole mounted equipment. I suggest a rental of \$50,000 per annum, plus GST, would allow for use by Optus and other future mobile operators.

Any revenue received should, I believe, be directed towards upgrades in Eltham Lower Park.

I note that rental charged by the City of Vincent, WA, for similar equipment in Britannia Reserve, Leederville is \$48,000 per annum (plus GST). Rental charged by the City of South Perth, WA for a monopole structure shared by Optus, Vodafone and Telstra with three base stations is \$50,000 per annum (incl. GST).

Regards

Natalie Campion

From: [REDACTED]
Sent: Wednesday, 4 June 2025 2:44 PM
To: Natalie Campion
Subject: Re: Telecommunications - Nillumbik eNews, June 2025

Thanks Natalie

Yes I am supportive of the tower but would be like it to be used by both Optus and Telstra.

Kind regards

[REDACTED]

On 4 Jun 2025, at 12:55 pm, [REDACTED]
wrote:

Hi [REDACTED]

I just left a phone message for you.

Thank you for your email below concerning the telecommunications tower proposed lease.

I have checked the eNews item below and it requires you to click on 'Participate Nillumbik' at the bottom, which takes you to the online survey at Participate Nillumbik website [Telecommunications Lease Proposal - Eltham Lower Park | Participate Nillumbik](#). The page should scroll down for you to complete the submission form, which appears as a box that looks like this:

<image003.jpg>

I am happy though to accept this email as a submission if you wish, but just want to clarify that it's supportive of the lease proposal subject to the tower being utilised for Telstra as well as Optus, if possible? I would include your full email below as a submission, but redact your personal information.

Kind regards

[REDACTED]

We acknowledge the Wurundjeri Woi-wurrung people as the Traditional Owners of the Country on which Nillumbik is located, we pay our respects to Elders past, present and future, and extend that respect to all First Nations People. We respect the enduring strength of the Wurundjeri Woi-wurrung and acknowledge that sovereignty was never ceded.

This email, including any attachments, is confidential and intended only for the individual or the entity named. If you received this email in error please advise the sender immediately by return email and delete it and all copies from your system. If you are not the intended recipient of this email, you must not use, print, distribute, copy or disclose its contents to anyone.

From: [REDACTED]
Sent: Wednesday, 4 June 2025 11:19 AM
To: Nillumbik <nillumbik@nillumbik.vic.gov.au>
Subject: Re: Nillumbik eNews, June 2025

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi It would appear that the survey on the lease of land for a new telecommunications tower will not move past the first page. I would really like to offer feedback

Here is my response

Yes if another tower is built I would like this to be a shared facility between Optus and Telstra. Overall towers are ugly but the Telstra phone service for me is virtually non existent. Even with a booster the service was intermittent and now Telstra booster service for 5 G are hugely expensive. so sharing the service makes total sense to me even if this doesn't help me. Please acknowledge receipt of this email.

Kind regards

[REDACTED]

On 4 Jun 2025, at 7:35 AM, Nillumbik Shire Council
<nillumbik@nillumbik.vic.gov.au> wrote:

Natalie Campion

From: [REDACTED]
Sent: Sunday, 29 June 2025 10:12 AM
To: Natalie Campion
Subject: [REDACTED] information to accompany my feedback submission
Participate Nillumbik- Proposed Lease with Indara at ELP
Attachments: Radiofrequency radiation injures trees around mobile phone base stations.pdf; The Effect of Exposure to an Electromagnetic Field on Entomopathogenic Fungi.pdf; The Effect of Exposure to an Electromagnetic Field on Entomopathogenic Fungi.pdf

[REDACTED]
Hi [REDACTED], here is my follow up information to accompany my feedback submission on Participate Nillumbik, on Indara's proposed lease at Eltham Lower Park.

I do not support the **proposed lease of the Indara Mobile Tower at Eltham Lower Park**, for many important reasons detailed below. My objections fall under the following main headings:

- 1) **Lack of due diligence, defective community consultation, incongruent information**
- 2) **Lack of Precautionary Approach/Risk Aversion concerning Health Impacts**
- 3) **Inadequate consideration of the possible impacts to Human Health specifically Children**
- 4) **Lack of consideration for an area of Cultural Heritage Sensitivity**
- 5) **Negative Visual Impact**
- 6) **Public Crown Land being used for Private Gains**

OBJECTION 1- Lack of Due Diligence, Defective Community Consultation, Incongruent Information

I don't believe that Nillumbik Council as the Committee of Management, nor the Minister for the *Crown Lands Reserves Act 1978*, should grant the proposed lease to Indara, as they have breached **INDUSTRY CODE C564:2025 MOBILE PHONE BASE STATION DEPLOYMENT**. Specifically in relation to the absence of provision of publicly available **Detailed Information Section 6.1.9**.

Additionally, they have breached their own Code of Conduct specifically **1.1 Governance, Risk and Controls**: "*Indara must comply with all laws, regulations codes of practice....*"

This lack of due diligence, has effectively denied the public access to legally required information, needed for effective decision making and feedback to Council. The public consultation process, a legal requirement of Indara and Council, has been largely compromised in this respect. Full transparency, and access to important data, is not available during the public consultation phase of the proposal. I was unable to access specific information I wished to use to inform my decision for my submission to Council.

Such breaches can reasonably lead the public to question the professionalism and trustworthiness of Indara. This conduct is not in alignment with community expectations for responsible governance.

Council's communication of important information on the proposed infrastructure is incongruent. Information on Participate Nillumbik only mentions a 30m high monopole. However, Indara's plans reveal a total height of 32.89m including all infrastructure. Similarly, the construction of a retaining wall required

for the base station is not mentioned on Participate Nillumbik. Council mentions the removal of one tree, however Indara's plans state trimming/removal of trees.

OBJECTION 2- Lack of Precautionary Approach/Risk Aversion concerning the full Environmental Impact

The proposed Mobile Tower poses risks to the many sensitive, protected, and endangered flora and fauna species, and unique biodiversity, housed in the adjacent Hohnes Hill Reserve, only 50m away. This includes the iconic **Eltham Copper Butterfly- ECB**, federally protected under the EPBC Act 1999, and under the **Nillumbik Biodiversity Strategy 2024-2034**.

Current research findings reveal the negative impact that Electro Magnetic Frequencies from Mobile Towers, can have on biodiversity: including insects, trees, and mycelium networks. Particularly those in close proximity. **SEE RESEARCH PAPERS ATTACHED**

Section 9.1.5 of The **INDUSTRY CODE C564:2025 MOBILE PHONE BASE STATION DEPLOYMENT** states: *"The Carrier must not assert anything to the effect that the absence of scientific proof means that there is no possibility of risk arising from the operation of Mobile Phone Radiocommunications Infrastructure."*

Furthermore Section **6.1.6** states *"Where it can reasonably be expected that an adjacent local government area will be impacted by a proposal, the Carrier must also seek comment from the Council administering that adjacent local government area."*

The **Director Planning, Environment and Strategy**, and **Director Governance, Communications and Community Safety**, and Council Officers responsible for consultation with Indara, should have known of and reported on the many protected and endangered species housed in the adjacent Hohnes Hill Reserve managed by Council. Proper consultation with internal **Environmental Works teams**, would have yielded this important information.

Council should adopt a **risk aversion and precautionary approach**, especially as plans allow for a second carrier to attach their infrastructure on top also, facilitating increased exposure to radio-frequency electromagnetic radiation (RF-EMR).

In the absence of the publicly available data on the infrastructure, and lack of environmental impact study, I also raise the concern that possible light pollution and shadow effects may further negatively impact the ECB.

Proper consideration of the **Environmental Significance Overlay** and the **Fire Management Overlay** is needed. The electrical infrastructure, including the base cabinet equipment, can typically include a generator, and battery, posing potential fire risks, along with transmitter wire faults. ELP is documented as a **flood inundation area** with the potential to negatively impact electrical infrastructure. Furthermore, batteries can leech heavy metal toxins such as lithium, cobalt and nickel into the environment.

A comprehensive environmental impact study should have been conducted prior to progression to public feedback. Especially as it is not a low impact proposal.

There is a potential risk of hazardous chemical/dust drift into Hohnes Hill Reserve that could impact sensitive species/biodiversity including ECB. Construction of slab and retaining wall: concrete contains alkaline compounds; calcium oxide, crystalline silica, and trace amounts of hexavalent chromium. Base cabinets and tower transmitters may require paints and chemical anti-corrosive coatings during construction, maintenance and updates.

The Indara plan includes the trimming/removal of trees. Trees should not be removed but preserved, in alignment with the **Nillumbik Biodiversity Strategy 2024-2034**.

OBJECTION 3- Health Impacts

Council's reliance on one ARPNSA factsheet from 2016, as a basis for deeming the proposal safe, is inadequate and narrow considering the complexity of the issue. It excludes consideration of other current Australian and international research findings, on the possible and proven health impacts of radio-frequency electromagnetic radiation (RF-EMR).

A thorough health impact study should be conducted, concerning the impact of emissions. Especially as plans allow for a second carrier to attach their infrastructure on top also, facilitating increased exposure to radio-frequency electromagnetic radiation (RF-EMR).

The Mobile Tower would be in very close proximity to children at the Hohnes Rd Playhouse, the ELP playground, the Dog Park and two sporting clubs. Indara needs to consider such 'Community Sensitive Locations', as governed by the Section 6.1.1-C of The **INDUSTRY CODE C564:2025 MOBILE PHONE BASE STATION DEPLOYMENT**.

Council should consider current research findings such as those that I've paraphrased below, by Australian Building Biologist- **Dr. Nicole Bijlsma**:

-France and Cypress don't allow mobile phones and restrict WiFi usage in schools.

-Unlike drums/satellite dishes which send signals to other base stations by beam, mobile towers emit frequencies sideways, so that people at ground level between 80 and 250 metres from the tower may be most impacted.

-Radiation allowed by Australian mobile networks is considerably higher than what is permitted in India and throughout many countries in Asia. In Salzburg, Austria for example emissions are one million times lower than in Australia.

Furthermore, Section 9.1.5 of The **INDUSTRY CODE C564:2025 MOBILE PHONE BASE STATION DEPLOYMENT** states: "The Carrier must not assert anything to the effect that the absence of scientific proof means that there is no possibility of risk arising from the operation of Mobile Phone Radiocommunications Infrastructure."

A precautionary approach, concerning the health and safety of children and adults in such close proximity, should be adopted here.

OBJECTION 4- Culturally Respectful Practice

The entire area is noted to be 'Culturally Sensitive'. What respectful consultation with the Wurundjeri Woi Wurrung Aboriginal Heritage Corporation, Indigenous Heritage Officers or Elders has Council engaged in regarding the proposed lease? Consultation is needed as it is not a low impact facility, earth will be disturbed, and the infrastructure will be within 300m of the Birrarung (Yarra) River and 600m of the sacred confluence with the Diamond Creek. Lack of consultation with Indigenous Elders is not in alignment with community expectations for respectful governance.

OBJECTION 5- Negative Visual Impact

Council has reported that the new monopole would be 30m H, which is much higher than the surrounding sports field lights. However, Indara reports that with the transmitters on top it will be 32.87m H. This creates a significant negative visual impact, on the surrounding natural environment and green open space. ELP is treasured by locals and utilized as a preferred site for recreation due to its unique, natural, open space and treed environment. The proposed lofty concrete monopole, and additional electrical and metal infrastructure, including wires and transmitters atop, and sizeable metal base cabinet and retaining wall below, would visually dominate this natural area. Especially as the plans allow for a second carrier to attach their infrastructure on top also. The proposed infrastructure is visually unsuitable for this site, and incongruent with community expectations for responsible governance of a much valued, public, open green space. It should be relocated.

OBJECTION 6- Crown Land is public land and not for private enterprise

I don't agree with Private companies benefitting from leasing Public Crown Land. Indara will furthermore seek additional funds through Connecting Victoria Funding. There is the potential for commercial profits to be prioritized over public gains and environmental protection, leading to habitat destruction, pollution, or degradation of ecosystems. Commercial activities on Crown land can have unintended environmental consequences.

Conclusion

In summary Indara's proposed lease at ELP is not appropriate for the site and should be relocated or **co-located on another carrier's tower**. As detailed in **INDUSTRY CODE C564:2025 MOBILE PHONE BASE STATION DEPLOYMENT, Section 3.2 Provision of Information**, Council should ask Indara for an assessment of the opportunities for co-location of Mobile Phone Radiocommunications Infrastructure, with the facilities of other carriers. The precautionary principle, due diligence considerations and councils own environmental policies, require a hiatus, reassessment and relocation of the proposal. I hope Council will carefully consider my objection, as per the Council Plan 2021-2025 -"we act in the best interest of community."

[REDACTED]

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[REDACTED]



Contents lists available at ScienceDirect

Science of the Total Environment

journal homepage: www.elsevier.com/locate/scitotenv



Radiofrequency radiation injures trees around mobile phone base stations



Cornelia Waldmann-Selsam^a, Alfonso Balmori-de la Puente^b, Helmut Breunig^c, Alfonso Balmori^{d,*}

^a Karl-May-Str. 48, 96049 Bamberg, Germany

^b C/Navarra, 1 5^aB, 47007 Valladolid, Spain

^c Baumhofstr. 39, 37520 Osterode, Germany

^d Consejería de Medio Ambiente, Junta de Castilla y León, C/Rigoberto Cortezoso, 14 47071 Valladolid, Spain

HIGHLIGHTS

- High frequency nonionizing radiation is becoming increasingly common.
- This study found a high level of damage to trees in the vicinity of phone masts.
- Deployment has been continued without consideration of environmental impact.

GRAPHICAL ABSTRACT

Bernartzky (1986), revisited:



ARTICLE INFO

Article history:

Received 6 June 2016

Received in revised form 19 July 2016

Accepted 6 August 2016

Available online xxxx

Editor: D. Barcelo

Keywords:

Electromagnetic radiation

Effects on trees

Phone masts

Radiofrequencies

ABSTRACT

In the last two decades, the deployment of phone masts around the world has taken place and, for many years, there has been a discussion in the scientific community about the possible environmental impact from mobile phone base stations. Trees have several advantages over animals as experimental subjects and the aim of this study was to verify whether there is a connection between unusual (generally unilateral) tree damage and radiofrequency exposure. To achieve this, a detailed long-term (2006–2015) field monitoring study was performed in the cities of Bamberg and Hallstadt (Germany). During monitoring, observations and photographic recordings of unusual or unexplainable tree damage were taken, alongside the measurement of electromagnetic radiation. In 2015 measurements of RF-EMF (Radiofrequency Electromagnetic Fields) were carried out. A polygon spanning both cities was chosen as the study site, where 144 measurements of the radiofrequency of electromagnetic fields were taken at a height of 1.5 m in streets and parks at different locations. By interpolation of the 144 measurement points, we were able to compile an electromagnetic map of the power flux density in Bamberg and Hallstadt. We selected 60 damaged trees, in addition to 30 randomly selected trees and 30 trees in low radiation areas ($n = 120$) in this polygon. The measurements of all trees revealed significant differences between the damaged side facing a phone mast and the opposite side, as well as differences between the exposed side of damaged trees and all other groups of trees in both sides. Thus, we found that side differences in measured values of power flux density corresponded to side differences in damage. The 30 selected trees in low radiation areas (no visual

* Corresponding author.

E-mail addresses: balmaral@jcy.es, abalmori@ono.com (A. Balmori).

contact to any phone mast and power flux density under $50 \mu\text{W}/\text{m}^2$) showed no damage. Statistical analysis demonstrated that electromagnetic radiation from mobile phone masts is harmful for trees. These results are consistent with the fact that damage afflicted on trees by mobile phone towers usually start on one side, extending to the whole tree over time.

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1. Introduction

For many years, there has been a discussion in the scientific community about whether artificial radiofrequency radiation has harmful effects on living organisms and, more specifically, on the environmental impact from mobile phone base stations (Panagopoulos et al., 2016). Trees have several advantages over animals as experimental subjects: they are continuously exposed to radiation in a constant orientation in the electromagnetic field due to their inability to move (Vian et al., 2016). Additionally, it is possible to easily document changes over time, such as disturbed growth, dying branches, and premature colour change of leaves. Moreover, the damage to trees is objective and cannot be attributed to psychological or psychosomatic factors.

Plants are specialized in the interception of electromagnetic radiation (light) but radiofrequency radiation impact on plants, which is becoming common in the environment because of the exponential use of mobile phone technology, has received little attention and his physiological effect has long been considered negligible.

Since the mid-twentieth century, several researchers have investigated the effects of electromagnetic radiation on plants, both in the laboratory (Kiepenheuer et al., 1949; Brauer, 1950; Harte, 1950, 1972; Jerman et al., 1998; Lerchl et al., 2000; Sandu et al., 2005; Roux et al., 2006, 2008; Sharma et al., 2009; Tkalec et al., 2005, 2009; Beaubois et al., 2007; Kundu and IEEE, 2013; Pesnya and Romanovsky, 2013; Cammaerts and Johansson, 2015; Grémiaux et al., 2016; Vian et al., 2016), and in nature (field observations) (Bernatzky, 1986; Volkrodt, 1987, 1991; Selga and Selga, 1996; Balodis et al., 1996; Haggerty, 2010). Both kinds of study have frequently found pernicious effects.

Around the world, phone masts have been deployed in the last two decades everywhere. Preliminary published studies have indicated deleterious effects of radiofrequency radiation on trees (Balmori, 2004; Van't Wout, 2006; Schorpp, 2011; Waldmann-Selsam, 2007; Waldmann-Selsam and Eger, 2013), cautioning that research on this topic is extremely urgent (Balmori, 2015). However, these early warnings have had no success and deployment has been continued without consideration of environmental impact.

In a review of the effects of environmental microwaves on plants (Jayasanka and Asaeda, 2013), it was indicated that effects depend on the plant family and the growth stage, as well as the exposure duration, frequency, and power density. This review concluded that most studies that address the effects of microwaves on animals and plants have documented effects and responses at exposures below limits specified in the electromagnetic radiation exposure guidelines and it is therefore necessary to rethink these guidelines (Jayasanka and Asaeda, 2013).

Since 2005, on the occasion of medical examinations of sick residents living near mobile phone base stations, changes in nearby trees (crown, leaves, trunk, branches, growth...) were observed at the same time as clinical symptoms in humans occurred. Since 2006 tree damages in the radiation field of mobile phone base stations were documented (<http://kompetenzinitiative.net/KIT/KIT/baeume-in-bamberg/>). In the radio shadow of buildings or that one of other trees, the trees stayed healthy.

Additionally, unilateral crown damage, beginning on the side facing an antenna, pointed to a possible link between RF-EMF (Radiofrequency Electromagnetic Fields) and tree damage. We carried out measurements on both sides of unilaterally damaged trees. Most of the trees had been exposed to RF-EMF for at least five years. Each time we

found considerable differences between the measured values on the damaged and on the healthy side.

The aim of the present study was to verify whether there is a connection between unusual (generally unilateral) tree damage and radiofrequency exposure.

2. Materials and methods

The official information of 65 mobile phone sites in the neighbouring cities Bamberg and Hallstadt was extracted from the EMF database (EMF-Datenbank) of the German Federal Network Agency (Bundesnetzagentur, in March 2011 and October 2015). Each site certificate ("Standortbescheinigung") provides information on the mounting height of antennas, the number and main beam direction of the sector antennas, the number of omnidirectional antennas (ND), the number of other transmitters, as well as the horizontal and vertical safety distances. The current specifications of the transmission facilities are available at: <http://emf3.bundesnetzagentur.de/karte/Default.aspx>

On most of the 65 mobile phone sites several sector antennas emitting RF-EMF with differences in frequency, modulation and other physical characteristics are installed (GSM 900, GSM 1800, UMTS, LTE (4th generation), TETRA). In 2011 there was a total of 483 sector antennas, in 2015 a total of 779 sector antennas.

Numerical code, address and UTM 32N coordinates for the 65 Mobile phone (base stations) sites in Bamberg and Hallstadt are shown in Table 1.

Between 2006 and 2015 there was observation and documentation of tree damages. There were some preliminary measurements on both sides of unilaterally damaged trees and approximately 700 trees in Bamberg and Hallstadt were visited. The condition of numerous trees has been documented in photographs. The photographs record the state of trees showing damage patterns not attributable to diseases, pests, drought or other environmental factors in order to monitor damage and growth over several years (in 2006, Olympus FE-100 was used; since 2007, Panasonic DMC-FZ50 was used).

In 2015 we selected a polygonal study site, with an approximate area of 30 km^2 , which includes partial municipalities of Bamberg and Hallstadt (70 km^2). The study area with the location of the phone masts in the layer of natural areas and municipalities is shown in Fig. 1. In this area, different measurements (see below) were done both for having a radiation map and for knowing which are the incident power densities beside different trees. In spite of the fact that measurements are changing continuously, they do not show significant differences between times (own data, see below).

In this polygon, we performed 144 measurements of the radiofrequency electromagnetic fields at a height of 1.5 m at different points in the city. These measurements were taken in streets and parks and allowed the preparation of an electromagnetic map of Bamberg and Hallstadt with their interpolation. The measurements were carried out with an EMF-broadband analyzer HF 59B (27–3300 MHz) and the horizontal-isotrope broadband antenna UBB27_G3, (Gigahertz Solutions). Measurements of the sum peak values of power flux density were in $\mu\text{W}/\text{m}^2$, which can be converted in V/m.

In general, a sector antenna covers an angle of 120° and the radiation of the sector antennas is distributed in main and secondary beams, bundled vertically and horizontally. The high-frequency emissions are reflected/diffracted and/or absorbed by buildings and trees. Therefore,

Table 1

Official information of the 65 mobile phone base stations in Bamberg and Hallstadt.

Code number	Adress in Bamberg and Hallstadt	X	Y	Code number	Adress in Bamberg and Hallstadt	X	Y
1	Altenburg	634268	5527019	34	Ludwigstr. 25 (Post)	636318	5529177
2	Am Borstig 2	636070	5531636	35	Luitpoldstr. 51	636241	5529232
3	Am Hirschknock	637511	5532267	36	Mainstraße, Ladekai 2	633924	5530319
4	An der Breitenau 2	637253	5530650	37	Mainstraße, Ladekai 3	633816	5530130
5	(An der Breitenau, P&R) ca.	637259	5526912	38	Margaretendamm 28	635341	5529331
6	(Artur-Landgraf-Straße)	635183	5526912	39	Memmelsdorfer Straße (Post) ca.	637769	5531392
7	Breitackerstr. 9	632965	5529621	40	Memmelsdorfer Str. 208a	637568	5531191
8	Coburger Str. 6a	635877	5529951	41	Memmelsdorfer Str. 208a	634861	5528541
9	Coburger Str. 35	635252	5530468	42	Mußstr. 1	634949	5528827
10	Erlischstr. 47/51	637291	5527903	43	Pödelndorfer Str. 144	637828	5529305
11	Franz-Ludwig-Str. 7	635843	5528490	44	Rheinstr. 16 ca.	632910	5530367
12	Geisfelder Str. 30	637689	5528020	45	Robert-Bosch-Str. 40	637767	5528292
13	Grüner Markt 1	635624	5528370	46	Schildstr. 81	637049	5529049
14	Grüner Markt 23	635640	5528565	47	Schranne 3	635511	5528166
15	Gutenbergr. 20	638448	5527180	48	Schützenstr. 23	636197	5527961
16	Hainstr. 4	635945	5528229	49	Schwarzenbergstr. 50	636762	5528732
17	Hainstr. 39	636341	5527550	50	Siemensstr. 37–43	638091	5528505
18	Hauptsmoorstr. 26a	638223	5530558	51	Theresienstr. 32	637487	5527866
19	Hauptsmoorwald, Pödelndorfer Straße	639683	5529635	52	Unterer Kaulberg 4	635350	5528084
20	Hauptsmoorwald, Geisfelder Straße	639890	5528022	53	Von-Ketteler-Str. 2	637905	5527553
21	Heiliggrabstr. 15	636054	5529240	54	Wilhelmsplatz 3	636316	5528259
22	Heinrichsdamm 1	635849	5528723	55	Zollnerstr. 181	637772	5530133
23	Heinrichsdamm 33a, P&R	636748	5527529	56	Heganger 18	634327	5530982
24	Hohenlohestr. 7	634794	5526480	57	Biegenhofstr. 13	633963	5531045
25	Kantstr. 33	637161	5530333	58	Seebachstr. 1	634399	5531764
26	Katzenberg	635374	5528266	59	Landsknechtstr.	634800	5531918
27	Kirschackerstr. 37	636649	5530756	60	Lichtenfelser Str.	634864	5532621
28	Kloster-Langheim-Str. 8)	637190	5529182	61	Michelinstr. 130 ca.	635629	5532106
29	Kronacher Str. 50	636722	5531496	62	Margaretendamm	634991	5529497
30	Kronacher Str. 4–6	634850	5529871	63	Mainstr. 36a/Kiliansplatz	634326	5532386
31	Lagerhausstr. 19	634304	5530136	64	Bamberger Straße	635964	5526050
32	(Laurenziplatz 20)	635207	5527404	65	Würzburger Str. 76	635359	5526709
33	Ludwigstr. 2	635207	5529103				

due to existing obstacles there is an inhomogeneous radiofrequency field distribution. Buildings and vegetation (trees and foliage) can shield and reduce radiation and thus affect the quality of signal propagation (e.g. Meng and Lee, 2010). Living material is not a perfect dielectric object and interferes with high frequency electromagnetic fields in a way that depends upon several parameters, including the general shape,

conductivity, and density of the tissue, and the frequency and amplitude of the electromagnetic radiation (Vian et al., 2016).

In the polygon mentioned before we selected 60 trees showing unilateral damage. The selection was limited by the fact that we were able to measure with the telescopic rod only up to a height of 6 m. Many trees (*Tilia*, *Betula*, *Quercus*, *Populus*, *Picea*) showing damage above the

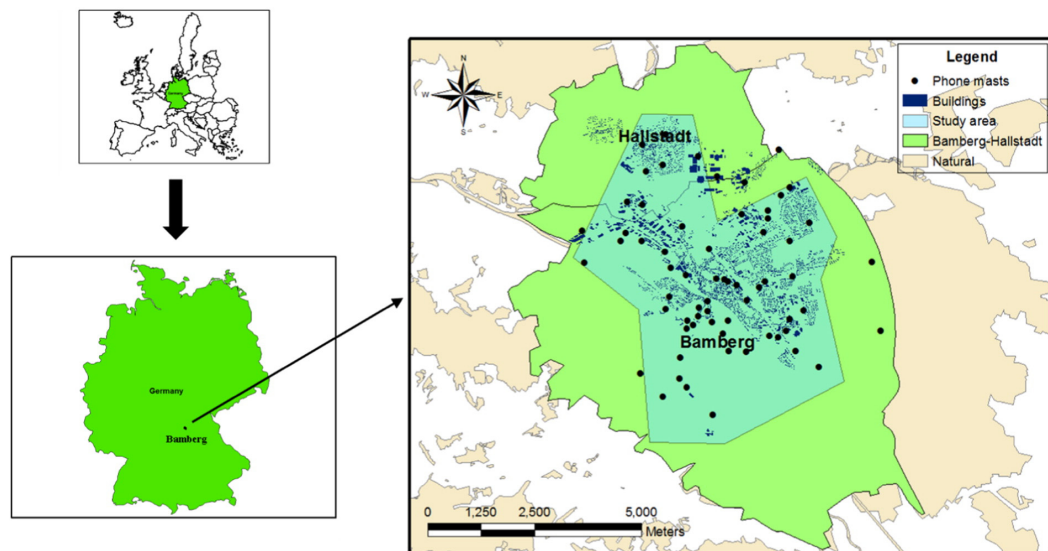


Fig. 1. The study area with the location of the phone masts in the layer of natural areas, buildings, and municipalities.

height of 6 m could not be included. The measurements at the trees were done between April and October 2015. *Acer platanooides*, *Carpinus betulus*, *Tilia* sp., *Taxus baccata* and *Thuja occidentalis* are widely spread in Bamberg and Hallstadt and can be reached for measurements. Therefore they are the most represented species.

The selected 60 trees from the study polygon show damage patterns that are not usually attributable to harmful organisms, such as diseases (fungi, bacteria, viruses) and pests (insects, nematodes) or other environmental factors (water stress, heat, drought, frost, sun, compaction of the soil, air and soil pollutants).














The main features of damage from this source are:

- Trees are mainly affected on one side (showing side differences and unilateral damage) and can appear in any orientation. The damage only originates on one side.
- Damage appears without external indications that the tree is infested with insects, nematodes, fungi, bacteria or viruses.

- Damage appears on trees, which have previously grown well. Damage appears on once healthy trees within one or two years after Antennas were put into operation.
- Damage increases from the outside to the inner part of the crown over time.
- Trees of different species in the same location also show damage.
- Damage appears in favourable (gardens, parks) as well as in unfavourable locations.
- Trees in the same location, but that are shielded by buildings or other trees, are healthy.

For these damaged trees, we used 13 damage codes that may be recognised with the naked eye (for explanations, see Table 2). In order to explain each type of damage visually, a photograph was added for each damage code.

Table 2
Tree damage codes.

01 Damage only on one side: The tree shows damage only on one side. The damage can be recognized with the naked eye.	
02 Crown transparency (sparse leaves or needles): The number of leaves or needles is reduced. The crown transparency increases from year to year.	
03 Brown leaves (start at leaf margins): The leaves begin to turn brown in June. The browning starts at the leaf margins. It looks similar to effects by salt.	
04 Colour change of leaves prematurely: Leaves become yellow, red or brown (in the whole) early in the year.	
05 Tree leaves fall prematurely: The leaves begin to fall already from June on.	
06 Dead branches: Over a period of some years it can be observed how little and big branches die.	
07 Tip of the main trunk dried.	
08 Irregular growth. The growth of deciduous and coniferous trees can be disturbed in different manners. One observation is that trees bend to a side.	
09 Not grow in height: Trees often stop to grow in height. The height was not measured. Only the visual impression was valued.	
10 Colour change of needles. Needles can change their colour to yellow, red or brown.	
11 Dead parts were trimmed down: When bigger branches die, it becomes necessary to remove these parts for the sake of security of people passing.	
12 Damage on different sides: The trees show damages on different sides.	
13 No damage: The tree shows the typical habitus of its species. With the naked eye no damage can be seen.	

PCC.010/25 Indara Corporation P/L lease proposal for Optus telecommunications infrastructure at Eltham Lower Park
Attachment 2. Submissions - redacted

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Table 3

144 selected points in Bamberg and Hallstadt with their measurements and UTM coordinates.

Number	Streets and parks in Bamberg and Hallstadt	Measurement $\mu\text{W}/\text{m}^2$	X	Y	Number	Streets and parks in Bamberg and Hallstadt	Measurement $\mu\text{W}/\text{m}^2$	X	Y
1	Wassermannpark	2300	637395	5530345	73	Ludwigstraße/Zollnerstraße	50	636228	5529444
2	Memmelsdorfer Str. 209	1830	637581	5531113	74	Landratsamt, Ludwigstraße, Einfahrt	670	636422	5529044
3	Holunderweg	10	638125	5530967	75	Wilhelmsplatz, Mitte	460	636250	5528263
4	Hauptsmoorstraße/Seehofstraße	3600	638039	5530857	76	Amalienstr. 16	16570	636303	5528086
5	Greiffenbergstr. 79	4210	638349	5530855	77	Otttostr. 7a	120	636133	5527878
6	Heimfriedweg 16	870	638393	5530621	78	Schönbornstr. 3	3640	636251	5527696
7	AWO, Innenhof, Parkplatz	3920	638223	5530584	79	Hainspielplatz	1530	636229	5527403
8	Ferdinand-Tietz-Str. 40	2600	637883	5530616	80	P&R Heinrichsdamm, Parkplatz bei Kirschen	3400	636706	5527667
9	Ferdinand-Tietz-Str. 38	80	637889	5530601	81	P&R Heinrichsdamm, südöstlich des Senders, Eichen	1690	636755	5527504
10	Petrinistr. 20	1340	637797	5530514	82	Luisenhain, Höhe Wasserwerk	260	636895	5526482
11	Petrinistr. 32	4700	637891	5530449	83	Kapellenstraße	2120	637050	5528148
12	Zollnerstraße 181	9300	637773	5530102	84	Geisfelder Str. 9, Gärtnerei	740	637410	5528164
13	Wassermannstr. 14	540	637424	5530125	85	Gereuthstr. 8	30	637621	5527424
14	Feldkirchenstraße/Kantstraße	2620	636803	5530069	86	Distelweg, Innenhof	15	637881	5527160
15	Breslaustr. 20	3890	637392	5530431	87	Am Sendelbach BSC 1920	30	637331	5526877
16	Berliner Ring	16920	637188	5530786	88	Am Sendelbach, Kleingartenanlage	10	637542	5526222
17	Rodezstr. 3	3780	637044	5530765	89	Robert-Bosch-Straße	2060	637504	5528200
18	Am Spinnseyer 3	880	637545	5530764	90	Ludwigstraße/Memmelsdorfer Straße	1000	635974	5529708
19	Kirschackerstr. 24	4290	636655	5530857	91	Coburger Straße, Neubau Studentenwohnheim	3460	635867	5529878
20	Kammermeisterweg	810	636283	5530282	92	Coburger Straße, junge Platane	3400	635835	5529941
21	Eichendorff-Gymnasium, Hof	6340	637194	5529084	93	Gundelheimer Str. 2	9000	635783	5529680
22	Starkenfeldstraße/Pfarrfeldstraße	3660	637092	5529138	94	Hallstadter Straße	12	635232	5530212
23	Parkplatz auf der Westseite der Polizei	9020	636921	5528970	95	Gerberstraße/Benzstraße	1280	635108	5530546
24	Starkenfeldstraße, Höhe Polizei	1120	636975	5529061	96	Coburger Straße, Einfahrt Fitnesszentrum	2000	635326	5530508
25	Starkenfeldstr. 2	860	637527	5529216	97	Kleintierzuchtanlage	890	635380	5530622
26	Pödelndorfer Str., Haltestelle	2180	636965	5529217	98	Margaretendamm, Eingang ehemaliges Hallenbad	1300	635455	5529178
27	Kindergarten St. Heinrich, Eingang	6450	637712	5529364	99	Margaretendamm/Europabrücke	1890	635200	5529365
28	Pödelndorfer Straße, Haltestelle Wörthstraße	1620	637654	5529433	100	Margartendamm 38, nahe Sendeanlage	5560	635003	5529497
29	Pödelndorfer Str. 142, Nordseite	30	637840	5529437	101	Hafenstraße/Regnitzstraße	7610	634719	5529740
30	Pödelndorfer Str. 142, Südseite	17060	637824	5529410	102	Lagerhausstraße	210	634556	5530102
31	Berliner Ring, Höhe Pödelndorfer Str. 144	4480	637900	5529380	103	Hafenstr. 28, Bayerischer Hafen	3200	634192	5530370
32	Schwimmbad Bambados, Vorgarten mit Bambus	1620	638074	5529315	104	Laubanger 29	160	634202	5530561
33	Schwimmbad Bambados, Parkplatz, Feldahorn	2540	638202	5529346	105	Heganger	1400	634341	5530812
34	Carl-Meinelt-Str.	5360	638043	5529094	106	Emil-Kemmer-Str. 2	5000	633822	5530863
35	Volkspark, FC Eintracht, Ostseite	120	638343	5529065	107	Emil-Kemmer-Str. 14	2500	634342	5531099
36	Michelsberger Garten, Teil Streuobst	5450	634831	5528673	108	Dr. Robert-Pfleger-Straße 60	90	634448	5530978
37	Michelsberger Garten, Terrassengarten, bei Eibe	2500	634988	5528508	109	Friedhof Gaustadt, Haupteingang	13100	632981	5529677
38	Michelsberger Garten, Südostecke, bei Holunder	910	635036	5528455	110	Friedhof Gaustadt, Ahornpaar	1400	632929	5529728
39	Michelsberg, Aussichtsterrasse, oberhalb Weinberg	1260	634924	5528463	111	Herzog-Max-Str. 21	1600	636245	5528071
40	Michelsberg, Aussichtsterrasse, Aussichtspunkt	780	634911	5528537	112	Gaustadter Hauptstr. 116	10	634042	5529457
41	Michelsberg, Nordostecke, bei jungen Linden	390	634874	5528565	113	Landesgartenschauelände, Hafenerlebnispfad	2000	633789	5529894
42	Storchgasse/Michelsberg	200	634725	5528415	114	Landesgartenschau, junge Baumgruppe	1270	633949	5529718
43	St. Getreu-Kirche, Südseite	55	634518	5528405	115	Würzburger Str.	340	635283	5527151
44	Villa Remeis, Garten	390	634295	5528203	116	Würzburger Straße/Arthur-Landgraf-Straße	1380	635355	5526862
45	Villa Remeis, Treppe	300	634400	5528237	117	Hohe-Kreuz-Straße/Würzburger Straße, Haltestelle	590	635383	5526733
46	Maienbrunnen 2	3920	634744	5528838	118	Hohe-Kreuz-Straße	10950	635469	5526729
47	Am Leinritt	2140	635071	5528617	119	Am Hahnenweg 6	3420	635332	5526729
48	Abtsberg 27	130	634526	5528935	120	Am Hahnenweg/Viktor-von-Scheffel-Straße	640	635307	5526710
49	Welcome Hotel, Garten	3200	634788	5529012	121	Am Hahnenweg 28 a	145	635028	5526654
50	Mußstraße, eingang Kindergarten	1670	634864	5529011	122	Schlüsselberger Straße	200	634712	5526534
51	Mußstraße/Schlüsselstraße	710	634846	5529034	123	Schlüsselberger Str./Haltestelle Hezilostr., Parkdeck	460	634749	5526549
52	Nebingerhof	2040	635069	5528901	124	Hezilostr. 13	70	634604	5526563
53	Graf-Stauffenberg-Platz	100	635120	5529009	125	Südkleinsweg, junge Hainbuchenhecke	75	634512	5526654
54	Don-Bosdo-Straße, Innenhof	10	635176	5529056	126	Röckleinsweg, oberes Ende	300	634708	5526789
55	Pfeuferstraße/Weide	1100	635222	5528820	127	Große Wiese	1500	634874	5526810

Table 3 (continued)

Number	Streets and parks in Bamberg and Hallstadt	Measurement $\mu\text{W}/\text{m}^2$	X	Y	Number	Streets and parks in Bamberg and Hallstadt	Measurement $\mu\text{W}/\text{m}^2$	X	Y
56	Weidendamm/Don-Bosco-Straße	1860	635166	5529195	128	Suidgerstraße	195	634508	5526409
57	Katzenberg/Karolinenstraße	1720	635316	5528239	129	Waizendorfer Straße	280	635317	5525864
58	Vorderer Bach	450	635305	5528141	130	Waizendorfer Straße, Einfahrt Gärtnerei	210	635326	5525582
59	Obere Brücke	8000	635565	5528289	131	Klinikum, Nähe Spielplatz	175	635732	5525672
60	Judenstraße	6	635479	5528040	132	Klinikum Weiher	100	635759	5525520
61	Tourist Information	4920	635674	5528172	133	Buger Straße/Bamberger Straße	2730	635829	5526082
62	Universität, Am Kranen 14, Innenhof	10	635501	5528535	134	Dunantstraße	470	635848	5526176
63	Fleischstraße	10	635703	5528683	135	Buger Straße/Paradiesweg	90	635743	5526286
64	ZOB	600	635882	5528541	136	Buger Straße/Abzweigung Münchner Ring	470	635528	5526499
65	Schönleinsplatz, Ostseite	900	636004	5528300	137	Hallstadt, Markplatz, bei Linde	2000	634582	5532426
66	Friedrichstraße, Parkplatz	165	635984	5528360	138	Hallstadt, Markplatz 21, Innenhof	8	634632	5532488
67	Franz-Ludwig-Straße/Luisenstraße	1720	636158	5528410	139	Hallstadt, Lichtenfelser Str. 12	4000	634659	5532474
68	Franz-Ludwig-Str, Strassenbauamt	90	636246	5528408	140	Hallstadt, Lichtenfelser Str. 8	9000	634720	5532516
69	Heiliggrabstraße, Nähe Sender	4740	636072	5529245	141	Hallstadt, Am Gründleinsbach/Kemmerner Weg	200	634743	5532784
70	Heiliggrabstr. 29, Landesjustizkasse	20	636063	5529399	142	Hallstadt, Valentinstraße/Seebachstraße	2200	634232	5532237
71	Heiliggrabstr. 57, Aussichtspunkt Schiefer Turm	4500	635797	5529410	143	Hallstadt, Johannistr. 6	5000	634805	5532078
72	Bahnhof, ParkplatzWestseite	1600	636300	5529374	144	Hallstadt, Bamberger Straße/Michael-Bienlein-Straße	1860	634805	5531969

For each selected tree, the types of damage and the Universal Transversal Mercator (UTM) coordinates were recorded. In addition, two measurements were recorded: on the side showing damage and on the side without damage, generally corresponding to opposite sides of each tree. On both sides, the measurements were carried out at a variable height of 1–6 m (depending on the height of the tree), using a telescopic rod, a ladder, and the broadband radiofrequency meter.

Most measurements were done in the afternoon or in the evening on different days between April and October 2015. But the measurements on the two sides of each single tree were done one after another immediately on the same day and at the same time. The measurements took about 5 min on each side. When we stood on the ground or on a ladder

we measured the peak values. When we used the telescopic rod we measured the peak hold values. Using the telescopic rod and measuring peak hold values it took longer, because the measurements had to be repeated often in cases where RF-EMF emitting cars or passengers disturbed the results. At each single tree the two measurements were done in the height where the damage had appeared. Because the height of the 120 trees differed, it was necessary to do the measurements at different heights.

In theory, although measurements are changing continuously there is no evidence about significant changes in power densities of electromagnetic radiation produced by phone masts over time. One study carried over one year in the city of Madrid showed no changes in terms of radiation intensity between the three rounds of measurements

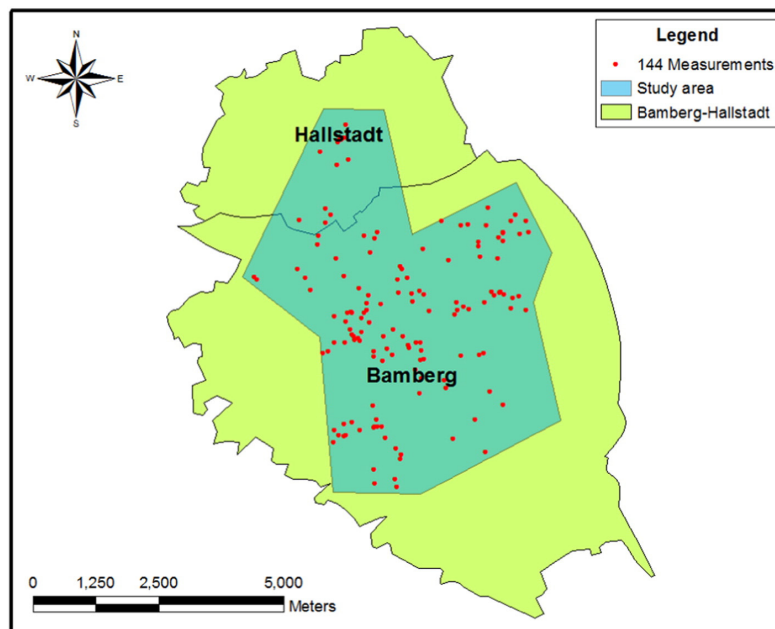


Fig. 2. Location of the 144 measurements points in Bamberg and Hallstadt in the study area.

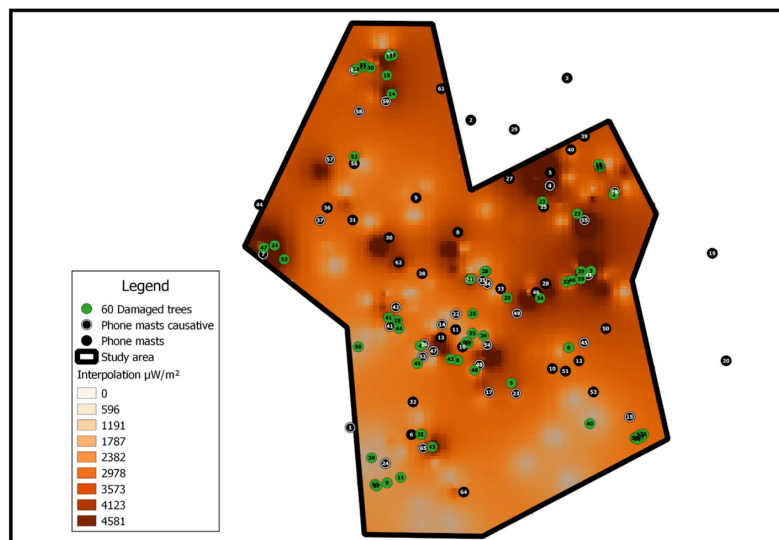


Fig. 3. Map showing the 60 damaged trees and phone masts (both with code numbers) over the interpolation electromagnetic map of the 144 measurement points.

performed in about 200 sampling points (own data). Repeatability analysis checked this. Despite the fact that the increase in sector antennas (observed between 2011 and 2015) would have probably increased the radiation in the environment of the study area, measurements used in this study were mostly done in 2015.

In an attempt to link the electromagnetic radiation measured at every tree to specific phone masts, the distances to the three nearest antennas that could be mainly responsible for the radiation measurements at each tree were calculated in meters with Geographical Information System (GIS) programs, following the general approach criteria of proximity. However, it must be taken into account that buildings and vegetation diminish radiation intensity and, in many cases, the nearest phone mast or masts may be obscured by obstacles. In other cases, the phone mast is in direct line of sight from the tree and the radiation can reach the tree directly.

Additionally, 30 random points were generated inside the polygonal study area and outside a layer of buildings, downloaded from: <http://www.mapcruzin.com/free-germany-arcgis-maps-shapefiles.htm> using a Random Points tool of QGIS 2.6.0-Brighton (QGIS Development Team, 2014) allowing create random points inside a specific layer. Therefore the points were randomly situated in specific places in the study area outside buildings but not frequently concur with the location of trees. That is why measurements were taken from the nearest tree for each random point, generating a random tree group. Measurements and damage characteristics were scored in the same way as with 60 damaged trees explained above, measuring the maximum value of radiation corresponding to opposite sides of each tree.

In areas of the city with low measurements of electromagnetic radiation (no visual contact to any phone mast and power flux density $<50 \mu\text{W}/\text{m}^2$), we scored another 30 trees in the same way as with 60 damaged trees and 30 random points. The UTM coordinates and the three nearest phone masts of each tree in these last two groups (random and low radiation trees) were also recorded.

To generate electromagnetic maps, we used ArcGis 9.3 (ESRI, 2008) and QGIS 2.6.0-Brighton (QGIS Development Team, 2014). To check possible differences between groups of data and taking into account that there were two measures made in each tree, repeated measures analysis of variance were applied, considering a repeated measures factor (within-subjects) and another between-subjects. The post hoc

Bonferroni test was used in all cases to elucidate significant differences. Statistics were performed using STATISTICA 7 program (StatSoft, Inc, 2004).

3. Results

The results of radiation measurements obtained at 144 points in Bamberg and Hallstadt at a height of 1.5 m were between $6 \mu\text{W}/\text{m}^2$ ($0.047 \text{ V}/\text{m}$) and $17,060 \mu\text{W}/\text{m}^2$ ($2.53 \text{ V}/\text{m}$) (for measurements and UTM coordinates, see Table 3). The measured values are far below the current limit values ($41 \text{ V}/\text{m}$ for GSM system and $61 \text{ V}/\text{m}$ for UMTS; ICNIRP, 1998).

The locations of these points in the study area are shown in Fig. 2. By interpolation of the 144 measurements points (Table 3), we prepared a map of the power flux density in Bamberg and Hallstadt (Fig. 3). This map is theoretical and approximate, since many factors affect the true electromagnetic values. However, the map is useful to provide approximate differences in exposure (electromagnetic pollution) throughout the city.

The 60 selected trees showing damage patterns not attributable to diseases, pests or other environmental factors are presented in Table 4. In this Table, we added the tree code number, the scientific name, the UTM coordinates, the measurements (power flux density) on both sides of each tree, and the distances (meters) and code numbers to the three nearest antennas for each tree, which may be mainly responsible for the electromagnetic radiation measured. We also included the orientation of the tree damage and the number of main (nearest) phone mast(s) in direct line of sight, whose lobe of radiation most directly affected each tree. Finally, we included the codes of damage observed in the 60 trees.

From all 60 selected trees, one or more phone mast(s) could be seen, with no obstacles between the phone mast and damaged tree. In many cases, one of the three closest antennas caused the main radiation on the tree surface. In ten trees (codes: 4, 7, 9, 10, 15, 26, 27, 31, 35, and 50), another antenna in direct line of sight caused the measured radiofrequency exposure. This was determined using topography and existing buildings (Table 4 and Fig. 3).

The 60 damaged trees (with their code number) and the phone masts are overlaid on the electromagnetic map prepared by interpolation of the 144 measurements points (Fig. 3). The likely antenna or

antennas causing radiation damage to each tree are also shown (Fig. 3). The measurements at all selected trees revealed significant differences between the damaged side facing a phone mast and the intact (or less

damaged) opposite side. On the side facing a phone mast, the measured values were 80–13,000 $\mu\text{W}/\text{m}^2$ (0.173–2.213 V/m). On the opposite side the values were 8–720 $\mu\text{W}/\text{m}^2$ (0.054–0.52 V/m).

Table 4

60 selected trees showing damage patterns not attributable to diseases, drought or other environmental factors.

N°	Scientific name	X	Y	Side antenna measurement $\mu\text{W}/\text{m}^2$	Opposite side measurement $\mu\text{W}/\text{m}^2$	Number of Phone Mast 1	Distance a 1	Number of Phone Mast 2	Distance a 2	Number of Phone Mast 3	Distance a 3	Direction of damage	Number of main phone mast(s) causing the radiation	Effect codes												
														1	2	3	4	5	6	7	8	9	10	11	12	13
														Damage only on one side	Sparse leaves or needles (crown transparency)	Brown leaves (start at leaf margins)	Colour change of leaves prematurely	leaves fall prematurely	Dead branches (Peak branches dried).	Tip of the main guide dried	Irregular growth	Not grow in eight	Color change of needles	Dead parts were trimmed down	damage on different sides	no damage
1	<i>Acer platanoides</i>	636298	5529366	970	130	35	145,6	34	190,1	21	274,6	S, SW	35,34,21	+	+	+		+	+	+		+				
2	<i>Acer platanoides</i>	638211	5530518	680	80	18	41,76	55	583,9	40	930,8	N	18	+	+	+		+	+		+		+			
3	<i>Acer platanoides</i>	637868	5529371	2100	290	43	77,18	28	703,9	55	768	S	43	+	+	+		+	+	+		+				
4	<i>Acer platanoides</i>	635316	5528245	2300	130	26	61,68	52	164,6	47	210,4	E, S	26,52,47, 14	+	+	+		+	+	+		+	+			
5	<i>Acer platanoides</i>	636677	5527688	3600	290	23	174,1	17	363,2	48	552,2	S	23	+	+	+		+	+	+		+	+			
6	<i>Acer platanoides</i>	637536	5528219	700	140	45	242,3	12	251	51	356,4	E	45	+	+	+		+	+	+						
7	<i>Acer platanoides</i>	635339	5526919	270	30	6	156,2	65	211	32	502,6	W	1	+		+		+	+	+		+	+			
8	<i>Acer platanoides</i>	635876	5528029	80	10	16	211,6	48	328,1	47	389,9	W	47	+	+	+		+								
9	<i>Acer platanoides</i>	634819	5526187	160	20	24	294,1	65	751,1	6	811,2	N	24, 1		+	+		+	+				+			
10	<i>Acer platanoides</i>	634638	5526163	180	55	24	353,3	65	904,4	6	926,3	N	24, 1		+	+		+	+							
11	<i>Acer platanoides</i>	635022	5526270	95	20	24	310	65	553,4	6	661,9	NW	24	+	+			+								
12	<i>Acer platanoides</i>	634854	5532596	11800	400	60	26,93	63	568,2	59	680,1	N	60	+	+	+		+	+	+		+				
13	<i>Acer platanoides</i>	634455	5532438	9900	620	63	139,1	60	448,1	59	624	W	63	+			+						+			
14	<i>Acer platanoides</i>	634890	5532028	3380	500	59	142,1	58	557,5	60	593,6	SW	59	+	+	+		+	+	+		+	+			
15	<i>Acer platanoides</i>	634815	5532307	1050	50	60	317,8	59	389,3	63	495,3	SW	58	+	+	+		+	+	+		+	+			
16	<i>Carpinus betulus</i>	638001	5530928	1210	120	18	431,5	40	506,6	39	518,8	S	18	+	+	+		+	+							
17	<i>Carpinus betulus</i>	637996	5530945	2520	150	18	448,7	40	493,7	39	501,3	S	18	+	+	+		+	+							
18	<i>Carpinus betulus</i>	637987	5530959	890	90	18	465,3	40	478,9	39	484,8	S	18	+	+	+		+								
19	<i>Carpinus betulus</i>	637984	5530970	670	10	40	471,1	39	473,6	18	476,3	S	18	+	+	+		+								
20	<i>Carpinus betulus</i>	636619	5528966	1000	200	33	169,6	49	274,2	34	367,6	SE	49		+	+		+	+		+	+				
21	<i>Carpinus betulus</i>	636068	5529245	430	20	21	14,87	35	173,5	34	259,1	W	21	+	+	+		+			+	+				
22	<i>Carpinus betulus</i>	637138	5530413	4340	110	25	83,24	4	263,4	5	450,6	NE	4	+	+	+		+	+	+		+				
23	<i>Carpinus betulus</i>	637664	5530231	990	60	55	145,8	25	513,2	4	586,9	E	55	+	+	+		+	+							
24	<i>Carpinus betulus</i>	633137	5529754	2700	50	7	217,4	44	653,7	37	776,2	E	37	+	+	+		+	+							
25	<i>Tilia sp.</i>	636098	5528729	870	150	22	249,1	11	349,5	14	486,5	W	22	+	+	+		+	+							
26	<i>Tilia sp.</i>	636261	5528398	410	20	54	149,5	16	358,4	11	428	W	14	+		+		+								
27	<i>Tilia sp.</i>	636030	5528283	680	160	16	100,7	11	279	54	287	S	48	+	+		+	+	+				+			
28	<i>Tilia sp.</i>	634972	5528626	660	170	41	139,8	42	202,3	26	539,6	SW	41	+	+	+		+	+	+		+	+			
29	<i>Tilia sp.</i>	636283	5529365	2450	160	35	139,5	34	191,2	21	260,9	SW	35, 34, 21	+		+		+			+	+				
30	<i>Tilia sp.</i>	634573	5532422	3800	420	63	249,6	60	352,5	59	552,8	NE	60	+	+	+		+	+				+			
31	<i>Tilia sp.</i>	635319	5526914	380	120	6	136	65	208,9	32	502,6	W	1	+	+		+	+	+	+						
32	<i>Quercus robur</i>	638598	5526911	860	130	15	308	53	944,7	12	1434	NW	15		+			+	+							
33	<i>Quercus rubra</i>	637501	5529207	1340	120	28	312	43	341,4	46	478,8	E	43	+	+			+	+							
34	<i>Quercus rubra</i>	637107	5528961	1650	250	46	105,4	28	236,1	49	414,1	SW	49	+	+			+								
35	<i>Aesculus hippocastanum</i>	636092	5528434	400	20	16	252,3	11	255,2	54	284,3	W	14	+	+	+		+	+	+		+				
36	<i>Robinia pseudoacacia</i>	638653	5526920	1300	40	15	331,1	53	979,9	12	1463	NW	15	+			+		+	+		+				

37	<i>Robinia pseudoacacia</i>	638619	5526874	660	240	15	350,5	53	985,3	12	1476	NW	15		+			+				+	
38	<i>Sorbus occuparia</i>	634587	5526564	84	8	24	223,4	1	555,7	6	690,2	N	1		+	+	+		+	+	+		+
39	<i>Acer negundo</i>	637722	5529366	3060	310	43	122,3	28	562,9	46	743,9	SE	43		+	+			+	+			+
40	<i>Acer saccharinum</i>	637852	5527078	840	180	53	477,9	15	604,7	51	868,4	E	15		+	+			+				
41	<i>Juglans regia</i>	634841	5528669	4500	590	41	129,6	42	191,4	26	668,2	N, E	42		+	+			+	+	+	+	+
42	<i>Taxus baccata</i>	635767	5528046	300	70	16	255,3	47	282,7	13	354,2	NW	47		+	+				+			+
43	<i>Taxus baccata</i>	635491	5526727	8970	190	65	133,2	6	359,3	32	734,2	W	65		+	+				+			+
44	<i>Taxus baccata</i>	634997	5528506	2500	240	41	140,4	42	324,6	26	446,9	N.E.W	41,42			+				+			+
45	<i>Taxus baccata</i>	635272	5527980	2700	70	52	130	47	302,8	26	303,6	NE	52		+	+				+			+
46	<i>Taxus baccata</i>	637586	5529231	1520	190	43	253,1	28	399	46	567	E	43		+	+						+	+
47	<i>Thuja occidentalis</i>	632975	5529719	910	30	7	98,51	44	651,3	37	936,1	S	7		+	+				+			+
48	<i>Thuja occidentalis</i>	636128	5527881	120	10	48	105,6	16	393,2	17	393,6	S	17		+	+				+			+
49	<i>Thuja occidentalis</i>	634900	5532611	13000	520	60	37,36	63	616,5	59	700,2	NW	60		+	+				+			+
50	<i>Thuja occidentalis</i>	634387	5528232	290	50	41	565,8	42	818,5	52	974,3	S	1		+	+				+	+		+
51	<i>Picea pungens</i>	638525	5526863	770	90	15	326,2	53	927,6	12	1427	NE	15		+	+				+			+
52	<i>Picea pungens</i>	634328	5531086	3080	310	56	104	57	367,3	58	681,7	W	57			+				+			+
53	<i>Picea pungens</i>	633280	5529546	1350	200	7	323,8	37	792,7	44	900,5	NW	7		+	+				+			+
54	<i>Pinus sylvestris</i>	638542	5526861	790	50	15	332,6	53	940,5	12	1439	NE	15			+				+	+		+
55	<i>Pinus sylvestris</i>	634461	5532462	5300	130	63	154,9	60	433,2	59	641	SW	63		+	+						+	
56	<i>Pseudotsuga menziesii</i>	638560	5526844	1720	60	15	354,2	53	965,2	12	1463	NE	15		+	+				+	+		+
57	<i>Juniperus communis</i>	634664	5526141	160	20	24	363,1	65	897,6	6	929,4	N	24		+	+				+			+
58	<i>Corylus avellana</i> 'Contorta'	634355	5532399	420	80	63	31,78	60	555,3	58	636,5	W	63		+	+	+			+	+		
59	<i>Corylus avellana</i>	637720	5529249	3880	720	43	121,7	28	534,2	46	700,2	N	43		+	+	+			+			+
60	<i>Symphoricarpos albus</i>	636002	5528299	1200	320	16	90,27	11	248,5	54	316,5	E	54		+	+				+	+	</	

Table 5
Results of the tree measurements at the 30 random points.

N°	Scientific name	X	Y	Side antenna measurement $\mu\text{W}/\text{m}^2$	Opposite side measurement $\mu\text{W}/\text{m}^2$	Number of Phone Mast 1	Distance a 1	Number of Phone Mast 2	Distance a 2	Number of Phone Mast 3	Distance a 3	Effect codes												
												1	2	3	4	5	6	7	8	9	10	11	12	13
												Damage only on one side	Sparse leaves or needles (crown transparency)	Brown leaves (start at leaf margins)	Colour change of leaves prematurely	leaves fall prematurely	Dead branches (Peak branches dried).	Tip of the main guide dried	Irregular growth	Not grow in eight	Color change of needles	Dead parts were trimmed down	damage on different sides	no damage
1	<i>Salix viminalis</i>	634095	5532455	10	10	63	241,1	58	754,9	60	786,7													+
2	<i>Thuja occidentalis</i>	634760	5532680	500	120	60	119,6	63	524,2	59	763		+				+	+			+		+	
3	<i>Abies alba</i>	634030	5530490	2200	900	36	201,2	37	418,8	31	447,7		+				+			+	+		+	
4	<i>Acer campestre</i>	634545	5530739	890	320	56	326,5	31	649,4	57	657,5	+	+				+							
5	<i>Acer platanoides</i>	634557	5530005	4600	1100	31	284,9	30	322,2	62	668,1	+	+	+		+						+		
6	<i>Picea abies</i>	635311	5530644	1900	210	9	185,6	8	894,8	30	900								+	+				
7	<i>Thuja occidentalis</i>	635635	5529879	10	10	8	252,5	38	621,9	9	702,6													+
8	<i>Acer platanoides</i>	635693	5529848	2600	310	8	210,9	38	625,5	21	707,1	+	+			+	+					+		
9	<i>Cornus sanguinea</i>	636415	5530248	40	30	27	559,3	8	614,5	25	750,8													+
10	<i>Acer pseudoplatanus</i>	637525	5530896	50	50	5	270,5	40	298,1	4	366,7													+
11	<i>Syringa</i>	638111	5531436	10	10	39	344,8	40	595,7	18	885,1													+
12	<i>Acer platanoides</i> 'Globorum'	637928	5530541	30	30	18	295,5	55	436,8	4	683,7													+
13	<i>Acer platanoides</i>	637159	5529361	20	15	28	181,7	46	330,8	43	671,3													+
14	<i>Quercus rubra</i>	638342	5528994	1480	570	50	549,7	43	600,8	45	907,4		+			+	+					+	+	
15	<i>Thuja occidentalis</i>	638359	5528569	25	20	50	275,5	45	653,6	12	866,2													+
16	<i>Tilia sp</i>	637412	5527922	460	320	51	93,6	10	122,5	12	293,8											+		
17	<i>Quercus robur</i>	637363	5527807	45	33	10	120	51	137,3	12	389,4													+
18	<i>Larix decidua</i>	637804	5527628	4400	3170	53	125,8	51	396,4	12	408,5		+				+		+				+	
19	<i>Acer pseudoplatanus</i>	637919	5527135	760	120	53	418,2	15	530,9	51	849,1	+	+			+	+	+				+		
20	<i>Acer negundo</i>	637329	5526888	190	30	23	865,1	53	879,8	51	990,7	+										+		
21	<i>Quercus robur</i>	637115	5527423	46	26	23	382	10	511,2	51	578,5													+
22	<i>Thuja occidentalis</i>	637315	5526260	40	13	64	1367	23	1390	53	1421	+								+				
23	<i>Salix matsudana</i> 'Tortuosa'	635403	5525413	15	12	64	848,8	24	1229	65	1297													+
24	<i>Populus tremula</i>	635410	5525828	15	9	64	596,8	65	882,5	24	897													+
25	<i>Salix matsudana</i> 'Tortuosa'	634981	5526161	41	23	24	369,8	65	665,7	6	777,7													+
26	<i>Prunus sp.</i>	634829	5526050	28	21	24	431,4	65	845,7	6	931,9													+
27	<i>Picea pungens</i>	634791	5526809	470	340	24	329	6	405,3	1	563,6		+				+		+					
28	<i>Cornus sanguinea</i>	635164	5527863	15	15	52	288,9	26	454,4	47	460,7													+
29	<i>Cornus sanguinea</i>	634905	5528779	20	20	42	65,12	41	242	26	695,1													+
30	<i>Acer negundo</i>	634202	5529092	8	8	42	792,6	41	859	62	886,9													+

significant or non-significant respectively differences between the measurements of the two sides are seen (Fig. 6). A post hoc Bonferroni comparisons test showed significant differences between the measurements from the exposed side of damaged trees and all other groups in the random points group (Table 8).

Of the 120 trees, those with lower mean distance to the three closest antennas have usually higher values of radiation (Fig. 7). However, screening is common in cities due to a large amount of buildings, thus some trees that are close to antennas show lower radiation values than expected. This means that radiation measurements at points close to antennas are variable (high and low) while trees farther from antennas always have low values.

A dossier with documentation gathered over the years and the examples of tree damages is presented in: <http://kompetenzinitiative.net/KIT/KIT/baeume-in-bamberg/>

4. Discussion

In the present study it was useful, that tree damages in the vicinity of phone masts in Bamberg and Hallstadt had been documented starting 2006. We found a high level of damage to trees in the vicinity of phone masts. The damage encountered in these trees is not attributable

to harmful organisms, such as diseases, pests or other environmental factors. These would impact upon the entire tree, whereas damage to trees in the present study was only found on parts of the tree and only on one side (unilateral). Therefore, these factors cannot explain the damage documented here. Generally in all trees of this study, damage is higher in areas of high radiation and occurs on the side where the nearest phone mast is located (Table 4 and Fig. 3). Moreover, areas with more antennas have more levels of radiation and damaged trees are found most often in these high electromagnetic polluted areas. These results showed that side differences in damage corresponded to side differences in measured values of power flux density. This paper look at the effects on trees, but also provides information on how electromagnetic radiation is distributed in a city (interpolation map and Fig. 7).

In this study deciduous and coniferous trees were examined under the real radiofrequency field conditions around phone masts in Bamberg and Hallstadt. From most phone masts a broad band of frequencies with different modulations and pulse frequencies and fluctuating power densities is emitted (GSM 900, GSM 1800, UMTS, LTE, TETRA). Different signals may have different effects due to their physical parameters (Belyaev, 2010; IARC, 2013). We do not discriminate between these different signals and cannot answer the question which part of the

Table 6

Results of the tree measurements in the 30 points with low radiation.

N°	Scientific name	X	Y	Side antenna measurement $\mu\text{W}/\text{m}^2$	Opposite side measurement $\mu\text{W}/\text{m}^2$	Number of Phone Mast 1	Distance a 1	Number of Phone Mast 2	Distance a 2	Number of Phone Mast 3	Distance a 3	Effect codes												
												1	2	3	4	5	6	7	8	9	10	11	12	13
												Damage only on one side	Sparse leaves or needles (crown transparency)	Brown leaves (start at leaf margins)	Colour change of leaves prematurely	leaves fall prematurely	Dead branches (Peak branches dried).	Tip of the main guide dried	Irregular growth	Not grow in eight	Color change of needles	Dead parts were trimmed down	damage on different sides	no damage
1	<i>Acer platanoides</i>	636741	5529855	26	20	25	636,3	33	784,1	35	798,8													+
2	<i>Carpinus betulus</i>	634853	5529041	10	8	42	234,5	62	476,4	41	500,1													+
3	<i>Carpinus betulus</i>	638311	5528439	12	10	50	229,7	45	563,5	12	750													+
4	<i>Carpinus betulus</i>	636753	5529880	8	8	25	609,6	33	811,5	28	823,5													+
5	<i>Carpinus betulus</i>	637817	5527130	15	12	53	432,1	15	633	51	806,6													+
6	<i>Carpinus betulus</i>	634931	5526731	15	15	24	286	6	310,3	65	428,6													+
7	<i>Tilia sp.</i>	636500	5529673	8	8	35	511,4	34	528,3	33	570,3													+
8	<i>Tilia sp.</i>	636824	5529794	17	9	25	635,7	28	713,1	33	755,3													+
9	<i>Quercus robur</i>	636455	5526130	9	8	64	497,5	65	1240	17	1425													+
10	<i>Quercus robur</i> 'Fastigiata'	636178	5528932	10	10	34	282,2	35	306,5	21	332													+
11	<i>Aesculus hippocastanum</i>	636828	5529780	10	10	25	645,5	28	699	33	744,2													+
12	<i>Aesculus carnea</i>	636463	5529709	12	12	35	526,1	34	551,4	33	608,6													+
13	<i>Robinia pseudoacacia</i>	635507	5528534	15	15	14	136,6	13	201,5	26	299,2													+
14	<i>Robinia pseudoacacia</i>	634720	5532783	8	8	60	216,7	63	559,3	59	868,7													+
15	<i>Acer campestre</i>	635697	5528689	40	30	14	136,5	22	155,8	11	246,8													+
16	<i>Acer campestre</i>	636486	5526116	6	6	64	526,2	65	1273	23	1437													+
17	<i>Juglans regia</i>	635744	5528667	20	15	22	119	14	145,7	11	202,8													+
18	<i>Platanus hispanica</i>	635496	5528529	17	15	14	148,4	13	204,1	26	289,9													+
19	<i>Prunus avium</i>	637958	5530874	10	8	18	412,4	40	502,6	39	551,4													+
20	<i>Prunus sp.</i>	636079	5528463	10	10	11	237,5	16	269,7	54	312,7													+
21	<i>Taxus baccata</i>	638407	5528502	5	5	50	316	45	673,6	12	864,8													+
22	<i>Taxus baccata</i>	638222	5531032	10	10	18	474	39	578,6	40	673,1													+
23	<i>Thuja occidentalis</i>	636518	5529853	9	9	8	648,4	35	680	34	705													+
24	<i>Thuja occidentalis</i>	635318	5528784	20	15	42	371,5	14	389,4	13	514,8													+
25	<i>Picea pungens</i>	636512	5529735	17	17	35	571,4	34	590,8	33	632													+
26	<i>Juniperus communis</i>	636549	5529756	8	8	35	607,8	34	623,4	33	653,7													+
27	<i>Cornus sanguinea</i>	638167	5529098	8	6	43	397,2	50	597,9	45	899,8													+
28	<i>Sambucus nigra</i>	635529	5525601	5	5	64	625,2	65	1121	24	1146													+
29	<i>Corylus avellana</i>	636422	5526181	5	3	64	476,4	65	1187	17	1371													+
30	<i>Corylus avellana</i>	636625	5529834	6	6	35	714	34	725,2	25	732,3													+

radiation has caused the damage. Nevertheless broad bands of frequencies, modulation, pulse frequencies, interferences and other physical characteristics may play an important role, since in some cases, damage already appears at low intensities. This can be a shortcoming of the study.

The aim of the present study was to find out whether there is a causal relationship between the unilateral tree damages, which had been observed since 2006, and the RF-EMF emitted from phone masts and a preliminary observation to find out whether various species react differently to RF exposure.

The selection of the 60 unilaterally damaged trees was limited by the fact that we could do measurements only up to a height of 6 m. Trees with damages above the height of 6 m could not be included.

Many factors can affect the health of trees: Air and soil pollutants, heat, frost, drought, as well as composition, compaction and sealing of the soil, road salts, root injury due to construction work, diseases and pests. Most of these factors do not affect a tree only on one side over a period of >5 years. Industrial air pollutants could eventually cause unilateral damage in direction to an industrial emitter. But the observed unilateral damages appeared in all directions and were not oriented to the incineration plant or other industrial plants. Root injury due to construction work can produce damage on one side of a tree, but 24 of the

60 selected trees were situated in gardens, parks or on the cemetery where they could not be affected by construction damages.

From the damaged side there was always visual contact to one or more phone mast (s). In each case measurements of the power flux density on the damaged side which was facing a phone mast and on the opposite side without (or with less) damage were carried out and the difference between the measured values on both sides was significant (Fig. 5), as well as between the exposed side of damaged trees and all other groups. In all 60 trees the gradient of damage corresponded to a gradient of measured values. The attenuation of the RF-EMF within the treetop offers an explanation: a part of the RF-EMF is absorbed by leaves or needles and another part is reflected, scattered and diffracted.

In the randomly selected group of 30 trees, 17 trees were situated on places with low radiation. These 17 trees showed no damages, the measured values were below $50 \mu\text{W}/\text{m}^2$ ($0.137 \text{ V}/\text{m}$) and there was no difference between opposite sides as in the low radiation group. On the other hand, 13 trees grew in the radiation field of one or more phone mast (s). These trees showed unilateral damage or damage on different sides. The measured values at damaged trees showed differences between both sides as in the previous group above.

In the group of 30 trees in areas with low radiation (radio shadow of hills, buildings or trees and without visual contact to phone masts)

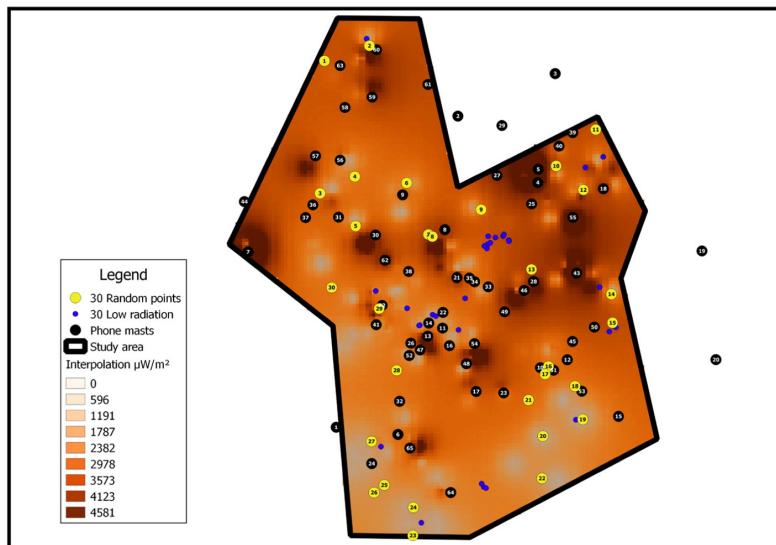


Fig. 4. Map showing the 30 trees at random points and the 30 trees in areas of low radiation (both with code numbers) over the interpolation electromagnetic map of the 144 measurement points. Phone masts (with code numbers) are also represented.

there were no unilateral damages. The measured values were below 50 μW/m² (0.137 V/m) and there was no difference between opposite sides. These results in the three groups point to a connection between unilateral tree damage and RF exposure.

In the electromagnetic field of all mobile phone base stations visited numerous tree damages were observed. The damage occurred in temporal relation with the putting into operation of new mobile phone base stations. Woody plants of all species are affected (deciduous and coniferous trees as well as shrubs).

In the five most represented species ($n \geq 4$) among the 60 damaged trees (*Acer platanoides*, *Carpinus betulus*, *Tilia* sp., *Taxus baccata* and *Thuja occidentalis*), most trees showed damage only on one side (Damage code 1, Tables 2 and 4). Most of these trees were characterized with sparse leaves or needles (crown transparency) (Damage code 2, Tables 2 and 4). In many of the trees with the one-sided damage, the leaves turned prematurely yellow or brown in June – this always began at

the leaf margins (Damage code 3, Tables 2 and 4). In many trees leaves fall prematurely (Damage code 5, Tables 2 and 4) or had dead branches (Peak branches dried) (Damage code 6, Tables 2 and 4). Some trees stopped growing in height while, in others, the main guide died (see Tables 2 and 4).

The differences in susceptibility of different species could be related to radiofrequency energy absorption properties of the trees (e.g., dielectric property). Perhaps this study cannot answer questions about these differences, however it is quite possible that differences are related to the electrical conductivity, related also with the density of the wood (species of fast or slow growth) and particularly with the percentage of water in the tissues. Poplars and aspen that grow near rivers and water bodies in Spain seem to be particularly sensitive to the effects of radiation. But the waves reflection in the water could also influence.

The results presented here lead us to conclude that damage found in the selected trees is caused by electromagnetic radiation from phone

Table 7

Repeated measures ANOVA analysis and Bonferroni post hoc comparisons ($p < 0.01$ values with *) in the three types of trees (damaged, random, and low radiation). Measurement Side 1/2 correspond to the maximum/minimum value of radiation respectively for the opposite sides of each tree.

		SS	Degr. of	MS	F	p		
Intercept		62663309	1	62663309	25.81460	0.000001*		
Type of tree		52931692	2	26465846	10.90280	0.000046*		
Error		284010086	117	2427437				
R1		33197069	1	33197069	18.28694	0.000039*		
R1*Type of tree		44608664	2	22304332	12.28656	0.000014*		
Error		212395158	117	1815343				
	Type of tree	R1	{1}	{2}	{3}	{4}	{5}	{6}
1	Damaged	Measurement Side1		0.000000*	0.001829*	0.000001*	0.000000*	0.000000*
2	Damaged	Measurement Side2	0.000000*		1.000000	1.000000	1.000000	1.000000
3	Random	Measurement Side1	0.001829*	1.000000		1.000000	1.000000	1.000000
4	Random	Measurement Side2	0.000001*	1.000000	1.000000		1.000000	1.000000
5	Low radiation	Measurement Side1	0.000000*	1.000000	1.000000	1.000000		1.000000
6	Low radiation	Measurement Side2	0.000000*	1.000000	1.000000	1.000000	1.000000	

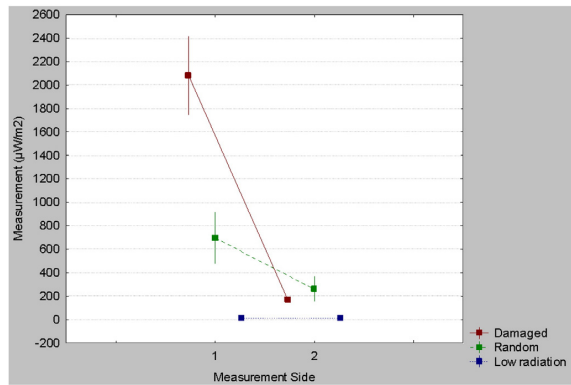


Fig. 5. Differences between measurements in both sides for the three different tree groups: damaged, random, and low radiation. Measurement Side 1/2 correspond to the maximum/minimum value of radiation respectively for the opposite sides of each tree. The bars represent means \pm standard errors. The central point represents the mean and the straight line \pm 0.95*SE.

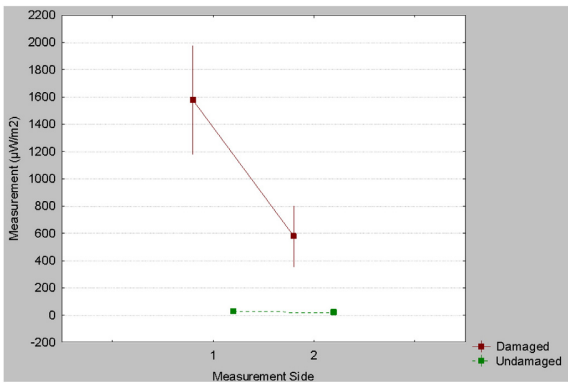


Fig. 6. Differences between measurements in both sides for the damaged and undamaged trees within the random trees group. Measurement side 1/2 correspond to the maximum/minimum value of radiation respectively for the opposite sides of each tree. The bars represent means \pm standard errors. The central point represents the mean and the straight line \pm 0.95*SE.

masts, as we proposed in previous studies (Balmori, 2004; Waldmann-Selsam, 2007; Waldmann-Selsam and Eger, 2013; Balmori, 2014). Interested parties are able to locate the damaged trees found in this work in Bamberg and Hallstadt with their UTM coordinates. However, trees with code numbers 20, 38 and 48 (Table 4) have been cut down and removed.

Research on the effects of radiation from phone masts is advancing rapidly. In February 2011 the first symposium on the effects of electromagnetic radiation on trees took place in Baarn, Netherlands (Schorpp, 2011 - <http://www.boomaantastingen.nl/>), where similar effects and results to those found in the current paper were presented.

Although there are some related experiments that show no effect of long-term exposure (3.5 years), 2450-MHz (continuous wave) and power flux densities from 0.007 to 300 W/m² on crown transparency, height growth and photosynthesis of young spruce and beech trees (Schmutz et al., 1996), this result may not be transferred to modulated 2450-MHz or to other pulsed and modulated frequencies. In addition, an increasing number of studies have highlighted biological responses and modifications at the molecular and whole plant level after exposure to high frequency electromagnetic fields (Vian et al., 2016). Plants can perceive and respond to various kinds of electromagnetic radiation over a wide range of frequencies. Moreover, a low electric field intensity (5 V/m) was sufficient to evoke morphological responses (Grémiaux et al., 2016). Electromagnetic radiation impacts at physiological and

ecological levels (Cammaerts and Johansson, 2015), and evokes a multitude of responses in plants. The effects of high frequency electromagnetic fields can also take place at the subcellular level: it can alter the activity of several enzymes, including those of reactive oxygen species (ROS) metabolism, a well-known marker of plant responses to various kinds of environmental factors; it evokes the expression of specific genes previously implicated in plant responses to wounding (gene expression modifications), and modifies the growth of the whole plants (Vian et al., 2016). It could be hypothesized that membrane potential variations in response to electromagnetic radiation exposure may initiate electrical waves of depolarization (AP and/or VP) that could initiate immediate or delayed growth responses (Grémiaux et al., 2016). It has been proposed that electromagnetic fields act similarly in plants and in animals, with the probable activation of calcium channels via their voltage sensor (Pall, 2016).

Electromagnetic radiation (1800 MHz) interferes with carbohydrate metabolism and inhibits the growth of *Zea mays* (Kumar et al., 2015). Furthermore, cell phone electromagnetic radiation inhibits root growth of the mung bean (*Vigna radiata*) by inducing ROS-generated oxidative stress despite increased activities of antioxidant enzymes (Sharma et al., 2009). Germination rate and embryonic stem length of *Triticum aestivum* was also affected by cell phone radiation (Hussein and El-Maghraby, 2014). After soybeans were exposed to weak microwave radiation from the GSM 900 mobile phone and base station, growth of

Table 8
Repeated measures ANOVA analysis and Bonferroni post hoc comparisons ($p < 0.01$ values with *) in the random trees group. Measurement Side 1/2 correspond to the maximum/minimum value of radiation respectively for the opposite sides of each tree.

	SS	Degr. of	MS	F	p	
Intercept	17829607	1	17829607	16.60985	0.000343*	
13 code	16391606	1	16391606	15.27023	0.000538*	
Error	30056202	28	1073436			
R1	3701923	1	3701923	16.73250	0.000329*	
R1*13 code	3627579	1	3627579	16.39647	0.000368*	
Error	6194761	28	221241			
	13 code	R1	{1}	{2}	{3}	{4}
1	Undamaged	Measurement Side 1		1.000000	0.002129*	0.416303
2	Undamaged	Measurement Side 2	1.000000		0.000034*	0.927155
3	Damaged	Measurement Side 1	0.002129*	0.000034*		0.000055*
4	Damaged	Measurement Side 2	0.416303	0.927155	0.000055*	

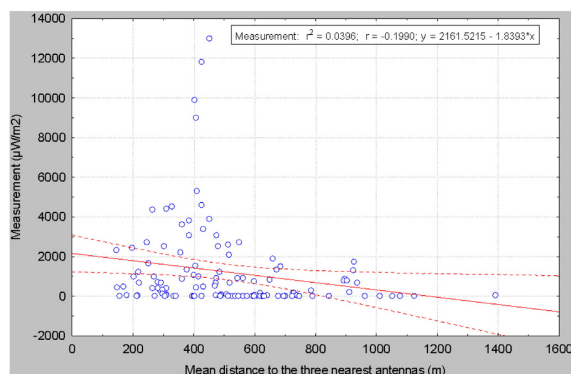


Fig. 7. Scatterplot showing the correlation between measurements from each of the 120 trees and the mean distance to the three nearest antennas. Dashed lines represent the 0.95 confidence interval.

epicotyl and hypocotyl was reduced, whereas the outgrowth of roots was stimulated. These findings indicate that the observed effects were significantly dependent on field strength as well as amplitude modulation of the applied field (Halgamuge et al., 2015). Phone mast radiation also affects common cress (*Lepidium sativum*) seed germination (Cammaerts and Johansson, 2015). In *Arabidopsis thaliana*, the long term exposure to non ionizing radiation causes a reduction in the number of chloroplasts as well as the decrease of stroma thylakoids and the photosynthetic pigments (Stefi et al., 2016). Finally, low-intensity exposure to radiofrequency fields can induce mitotic aberrations in root meristematic cells of *Allium cepa*; the observed effects were markedly dependent on the frequencies applied as well as on field strength and modulation (Tkalec et al., 2009).

In general, polarization from man-made electromagnetic radiation appears to have a greater bioactive effect than natural radiation, and significantly increases the probability for initiation of biological or health effects (Panagopoulos et al., 2015).

Tree damages as in Bamberg and Hallstadt were documented by the authors in several countries: Spain (Valladolid, Salamanca, Madrid, Palencia, León), Germany (Munich, Nürnberg, Erlangen, Bayreuth, Neuburg/Donau, Garmisch-Partenkirchen, Murnau, Stuttgart, Kassel, Fulda, Göttingen, biosphere reserve Rhön, Tegernsee Valley and in several small towns), Austria (Graz), Belgium (Brussels) and Luxemburg.

Each phone mast can harm many trees and each tree can be affected by several phone masts belonging to the same or different base stations. Damaged trees seem to exist around each antenna and the several million phone masts in the world could potentially be damaging the growth and health of millions of trees. This can occur not only in cities, but also in well-preserved forests, and in natural and national parks, where base stations are being installed without the necessary prior environmental impact studies, due to a lack of knowledge of the problem. For this reason, it is essential for an assessment on the environmental impact of any new base station prior to implementation.

Additionally, phone masts can cause a drop in timber productivity in plantations of pine, poplar, etc., as well as fruits, nuts, etc. Thus, the industry must be required to pay damages to plantation owners. Similarly, as trees are a common social good, the industry should compensate for damaged and dead trees around the world due to radiation. Further, the money spent by municipalities to repair or replace damaged trees should enter into the computation of costs/benefits of this technology. For installation of any new technology, the burden of proof should be to the industry that requires demonstration of safety prior to deployment.

Electromagnetic radiation from telecommunication antennas affected the abundance and composition of wild pollinators in natural habitats and these changes in the composition of pollinator communities

associated with electromagnetic smog may have important ecological and economic impacts on the pollination service that could significantly affect the maintenance of wild plant diversity, crop production and human welfare (Lázaro et al., 2016).

Evidence for plant damage due to high frequency electromagnetic radiation was not taken into account in determining the current statutory regulations (the limit values). Once the problem becomes evident, the guidelines of radiation emitted by the antennas should be reviewed. Proper risk assessment of electromagnetic radiation should be undertaken to develop management strategies for reducing this pollution in the natural environment (Kumar et al., 2015).

Moreover, due to the lack of recognition, certain modern projects with interesting ideas for decreasing environmental pollution could have opposite effects than expected. For example, in the Netherlands, the TreeWiFi project (<http://treewifi.org/>), which aims to motivate people to use bikes and public transport in order to reduce the [NO₂] pollution providing free WiFi when air quality improves, could be favoring electromagnetic pollution with even more harmful effects as it has been demonstrated in this manuscript (see also: <http://www.greenpeace.org/canada/fr/Blog/le-wi-fi-tuerait-les-ar-bres/blog/33569/>).

In addition, the number of sector antennas has increased in Bamberg and this increase appears to be accelerating: 483 sector antennas in 2011 and 779 sector antennas in 2015. Both radiation and damaged trees represent a loss of quality of life for citizens. This study began after finding that patients who claimed to be affected by phone masts, referred to as radiation, live in areas where affected trees and plants are located. Evidence of radiation damage was even found in potted plants inside patient homes (Waldmann-Selsam and Eger, 2013). Thus, this study is certainly complementary to the study by Eger and Jahn (2010) and other research that has shown effects on the health of people by phone masts located in their vicinity (Santini et al., 2002; Eger et al., 2004; Wolf and Wolf, 2004; Abdel-Rassoul et al., 2007; Khurana et al., 2010; Dode et al., 2011; Gómez-Perretta et al., 2013; Shahbazi-Gahrouei et al., 2014; Belyaev et al., 2015).

In the introduction to the International Seminar on "Effects of Electromagnetic Fields on the Living Environment" in 1999 in Ismaning, Germany, organized by WHO, ICNIRP and German Federal Office for Radiation Protection (BfS), M. Repacholi, head of the International EMF Project of the WHO, said: "By comparison, influences of these fields on plants, animals, birds and other living organisms have not been properly examined. Given that any adverse impacts on the environment will ultimately affect human life, it is difficult to understand why more work has not been done. There are many questions that need to be raised: ..." and "...it seems that research should focus on the long-term, low-level EMF exposure for which almost no information is available. Specific topics that need to be addressed include: ... EMF influences on agricultural plants and trees" (Matthes et al., 2000).

5. Conclusions

In this study we found a high-level damage in trees within the vicinity of phone masts. Preliminary laboratory studies have indicated some deleterious effects of radiofrequency radiation. However, these early warnings have had no success and deployment has been continued without consideration of environmental impact.

We observed trees with unilateral damage in the radiation field of phone masts. We excluded the possibility that root injury due to construction work or air pollutants could have caused the unilateral damage. We found out that from the damaged side there was always visual contact to one or more phone mast (s).

Statistical analyses demonstrated that the electromagnetic radiation from cellphone towers is harmful to trees. Results show that the measurements in the most affected sides of damaged trees (i.e. those that withstand higher radiation levels) are different to all other groups. These results are consistent with the fact that damage inflicted on

trees by cellphone towers usually start on one side, extending to the whole tree over time.

The occurrence of unilateral damage is the most important fact in our study and an important argument for a causal relationship with RF-EMF, as it supplies evidence for non-thermal RF-EMF effects. This constitutes a danger for trees worldwide. The further deployment of phone masts has to be stopped. Scientific research on trees under the real radiofrequency field conditions must continue.

Acknowledgements

The work presented here was carried out without any funding. Francisco Cabrero and José Ignacio Aguirre from the Department of Zoology, University Complutense of Madrid suggested the interpolation points on the map of radiation. This paper is dedicated in memoriam to the great Swedish researcher and courageous man, Örjan Hallberg. Authors have not a conflict of interest to declare.




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Article

The Effect of Exposure to an Electromagnetic Field on Entomopathogenic Fungi

Dariusz Roman Ropek ^{1,*} , Krzysztof Frączek ¹ , Krzysztof Pawlak ², Karol Bulski ¹  and Magdalena Ludwiczak ²

¹ Department of Microbiology and Biomonitoring, University of Agriculture in Kraków, al. Mickiewicza 21, 31-120 Kraków, Poland; krzysztof.fraczek@urk.edu.pl (K.F.); karol.bulski@urk.edu.pl (K.B.)

² Department of Zoology and Animal Welfare, University of Agriculture in Kraków, al. Mickiewicza 21, 31-120 Kraków, Poland; krzysztof.pawlak@urk.edu.pl (K.P.); swadzba.magdalena@gmail.com (M.L.)

* Correspondence: dariusz.ropek@urk.edu.pl; Tel.: +48-126624402

Featured Application: There is a potential for the application of a 900 MHz electromagnetic field to stimulate the growth of the mycelium and the pathogenicity of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Abstract: Background: The rapid development of mobile communication has caused an increase in electromagnetic field (EMF) emissions in the environment. However, there is a lack of research on the impact of EMFs on microorganisms. Thus, the aim of the study was to determine the effect of exposure to 900 and 1800 MHz electromagnetic fields on the entomopathogenic fungi (EPFs) *Beauveria bassiana*, *Cordyceps fumosorosea*, and *Metarhizium anisopliae*. Methods: The entomopathogenic fungi developed under exposure to an EMF for seven days. After the termination of exposure, the linear colony growth, sporulation, germination, and pathogenicity of the EPFs were investigated. Results: The effect of EMFs on *B. bassiana*, *C. fumosorosea*, and *M. anisopliae* depended on the EMF frequency and the tested fungus species. Exposure to the 900 MHz frequency stimulated the growth of the mycelium and the pathogenicity of the entomopathogenic fungi, whereas the 1800 MHz electromagnetic field inhibited sporulation and spore germination. Conclusions: The exposure to the 900 MHz frequency stimulated the development of the mycelium of all tested species and the pathogenicity of *C. fumosorosea*. The sporulation and germ tube length of the entomopathogenic fungi were stimulated by the 900 MHz frequency. The 1800 MHz electromagnetic field inhibited the sporulation and spore germination of *B. bassiana*.

Keywords: electromagnetic field; 900 MHz; entomopathogenic fungi; stimulation; inhibition



Citation: Ropek, D.R.; Frączek, K.; Pawlak, K.; Bulski, K.; Ludwiczak, M. The Effect of Exposure to an Electromagnetic Field on Entomopathogenic Fungi. *Appl. Sci.* **2024**, *14*, 11508. <https://doi.org/10.3390/app142411508>

Academic Editor: Ramona Iseppi

Received: 11 October 2024

Revised: 29 November 2024

Accepted: 4 December 2024

Published: 10 December 2024



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1. Introduction

An electromagnetic field (EMF) is a naturally occurring phenomenon associated with solar activity, cosmic radiation, or lightning [1]. Technological development has caused more and more artificial sources of electromagnetic fields to occur in the human environment [2,3]. In recent years, the rapid development of mobile communication has been observed, which is associated with an increase in electromagnetic emissions in radio frequencies. While there is considerable research on the impact of EMFs on vertebrates or plants [4–8], there are relatively few studies showing the impact of this factor on microorganisms. Said-Salman et al. [9] found that 24 and 48 h EMF exposure at a frequency of 2.4 GHz causes increased antibiotic resistance and motility in *Escherichia coli* 0157H7, as well as enhancing biofilm formation by *Escherichia coli* 0157H7, *Staphylococcus aureus*, and *Staphylococcus epidermis*. Crabtree et al. [10] showed an inconclusive effect of electromagnetic fields emitted by mobile telephony on the microbiota of human skin. In their research, they showed that EMFs can cause both the increased growth and inhibition of bacterial colonies of the *Staphylococcus* genus: *S. pasteuri*, *S. lugdunensis*, and *S. epidermidis*.

On the other hand, Koyama et al. [11] and Chang et al. [12] found no effect of radio frequency electromagnetic fields on the development of *Salmonella typhimurium* colonies (TA98, TA100, TA1535, and TA1537) or *Escherichia coli* (WP2 uvrA) and found no increased frequency of reverse mutations or accelerated DNA degradation of *Escherichia coli* WP2 and TA102 or *Salmonella typhimurium* TA98 and TA1535.

Of the studies on the impact of EMFs on fungi, the majority have focused on yeast; however, these studies have mainly been concerned with the impact of so-called weak electromagnetic fields. Choe et al. [13] showed that, under exposure to a 60 Hz field, the concentration of intracellular cations of calcium, potassium, sodium, and zinc increased, which could be utilized in bioremediation processes in metal-polluted environments. Riffo et al. [14] found that an EMF can cause the loss of yeast cell membrane continuity. The susceptibility of yeast to weak electromagnetic fields was also demonstrated by Perez et al. [15]. These authors noted that the ethanol fermentation of molasses and *Saccharomyces cerevisiae* under exposure to a 50 Hz field resulted in statistically significantly higher ethanol production than in the control group. Veerana et al. [16] showed that a radio-frequency electromagnetic field (RF-EMF) can increase the extracellular level of fungal total proteins and α -amylase activity in the fungus *Aspergillus oryzae*. Anaya et al. [17] proved that an extremely low-frequency oscillating magnetic field can stimulate the growth of a pathogenic strain of *Candida guilliermondii*. *C. guilliermondii* showed a tropic response to an applied magnetic field, expressed by the fast growth of its pseudohyphae [17]. Luma et al. [18] reported that exposure to mobile waves may significantly inhibit the mycelium growth of the fungi *Trichophyton mentagrophytes*, *Aspergillus niger*, and *Penicillium* spp. An EMF may not only have an inhibitory effect on fungi but can also stimulate some of their activities.

Entomopathogenic fungi (EPFs) are a common group of pathogens in almost all soil environments and play an important role in regulating the pest insect population in agroecosystems. EPFs of the genera *Beauveria*, *Isaria*, and *Metarhizium* are soil-inhabiting organisms that colonize the plant rhizosphere [19–21] and may positively affect plant resistance against plant pathogenic microorganisms [22]. These fungi are regarded as important pathogens of insects and other invertebrates [23,24]. Species like *Beauveria bassiana*, *Cordyceps fumosorosea* (formerly *Isaria fumosorosea*), or *Metarhizium anisopliae* are used for controlling many pests which affect humans, such as mosquitos or ticks, or plants, such as bark beetles, aphids, whiteflies, thrips, or mites [25]. Entomopathogenic fungi-based biopesticides play an important role in the integrated pest management (IPM) programs of many crops [26–28]. *Beauveria bassiana*, *Cordyceps fumosorosea*, and *Metarhizium anisopliae* are the main species of EPF used in plant protection products.

EPFs colonize the soil environment or plants with hyphae that compose the mycelium [29]. They infect hosts mainly by penetrating their bodies through the exoskeleton. The hyphae and mycelium growth of these fungi depends on many abiotic and biotic factors, such as temperature, moisture, soil pH, nutrient availability, or pollutants [30]. It is possible to use some factors to stimulate or inhibit the growth and sporulation of fungi, bacteria, and other microorganisms on artificial media [30], which may be important, among other things, for the mass production of EPFs. One of the directions of research on entomopathogenic organisms is the search for factors that may increase their pathogenic abilities. Current research results indicate the possibility of using magnesium ions [31] or static electromagnetic fields [32], among other factors.

The aim of the study was to determine the effect of exposure to 900 and 1800 MHz electromagnetic fields on the colony growth, sporulation, and pathogenicity of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

2. Materials and Methods

2.1. Biological Material

This study was conducted under laboratory conditions. The fungi were grown on solid media. The commercially available potato dextrose medium (PDA, Biocorp, London, UK)

was used in the experiment. The laboratory tests were carried out following the procedures described by Inglis et al. [33]. The research material consisted of three species: *Cordyceps fumosorosea* (strain I1), *Beauveria bassiana* (strain B1), and *Metarhizium anisopliae* (strain M4). The tested strains of entomopathogenic fungi came from the collection of the Department of Microbiology and Biomonitoring at the University of Agriculture in Krakow. The tested strains were isolated using the trap method from field soil (under the cultivation of wheat). The larvae of *Tenebrio molitor* were used for isolation. Identification of the fungal strain of the species was made on the basis of microscopic analysis (morphological characteristics) using the appropriate mycological keys.

2.2. Electromagnetic Field

The electromagnetic field was produced by a specially designed generator, emitting radio frequency electromagnetic waves (Global System for Mobile Communications: 900/1800 MHz). The 900 and 1800 MHz frequencies were chosen in this experiment because they are used in mobile communications systems and were examined in previous studies [5,34] which proved that the electromagnetic field of these frequencies has a significant effect on living organisms (vertebrates), showing a stimulating, inhibiting, or no effect on them. However, the effect of these EMF frequencies on entomopathogenic fungi had not yet been studied.

The EMF emitter used in the experiment allowed emissions of electromagnetic fields identical to those generated by mobile communications (Global System for Mobile Communications: 900/1800 MHz). The device consisted of a generator (maximum emission power of 330 mW) emitting electromagnetic waves, a controller, a power supply, and a cylindrical transmitting antenna (indoor 8dBi, omni ceiling antenna bands: GSM-1800 MHz—a linear polarized antenna produced by IAPT, Tarnów, Poland). The generator was computer-controlled via a USB interface. The software made it possible to select the strength of the generated signal and generator operation time. Petri dishes with inoculated fungi were placed in an area where electric fields ranged from 4.23 V/m to 6.25 V/m (± 0.01 V/m) and magnetic fields from 0.010 A/m to 0.014 A/m (± 0.001 A/m). The power density fluctuated between 0.090 W/m² and 0.110 W/m² (± 0.001 W/m²), and the frequency was 1800 MHz. The electromagnetic field parameters were measured on the surface of the Petri dishes using a Tenmars TM-195 3-axis meter (Tenmars Electronics, Taipei, Taiwan), which enables, among other things, isotropic measurement of the intensity of electric fields (0.01–20.0 V/m) and the intensity of magnetic fields (0.1–532.6 mA/m), as well as power density (10.0–106.94 mW/m²) under frequencies of 50 MHz to 3.5 GHz. During the experiment, the wave generator antenna was at a constant distance of 24 cm above the dishes. The electromagnetic field was emitted continuously. The dishes were exposed to an EMF for seven days. In the control, the dishes were placed out of range of the electromagnetic field under the same growing conditions: in the dark, with a temperature of 22 °C. After seven days, all dishes were placed in the same conditions as the control. Before and during the experiment, the authors measured the so-called background electromagnetic radiation, which includes natural electromagnetic fields. This procedure was aimed at determining whether any disturbances in the field were present at the measurement location that could potentially influence the obtained results. Throughout the entire experiment, no significant disturbances in the background electromagnetic radiation were detected.

2.3. The Effect of EMFs on Fungi

The fungi were inoculated on PDA with the addition of chloramphenicol (reducing the risk of bacterial contamination) in Petri dishes (diameter 90 mm). A disc (5 mm) with the inoculum of the respective fungus was placed in the central part of the plate. The Petri dishes were sealed with parafilm. The experiment was carried out in 4 replications. The diameter of the mycelium was measured 7 days (the end of exposure to EMFs) and 14 days after the experiment began. The effect of EMFs on the growth of fungi was evaluated on the basis of an inhibition/stimulation coefficient calculated according to

Abbott's formula: $I = [(C - E)/C] \times 100\%$, where I—inhibition index of fungus linear growth (%); C—diameter of fungus colony in control; and E—diameter of fungus colony exposed to the EMF [35]. The coefficient of the linear growth rate was also calculated using the formula described by Gleń et al. [36]: $T = (A/D) + (b_1/d_1) + \dots + (b_x/d_x)$, where T—linear growth coefficient; A—colony diameter measured at the end of the experiment [mm]; D—number of days since the start of the experiment; b_1 , b_x —increase in colony diameter since the last measurement [mm]; and d_1 , d_x —number of days since the last measurement. The growth inhibition/stimulation coefficient (I) described above was used to evaluate the inhibitory effect of the EMF on EPF sporulation, spore germination ability, and germ tube length.

Sporulation was assessed 14 days after the start of the experiment by sampling a fragment of mycelium on the edge of the colony. The mycelium was placed in a tube with 10 cm³ of distilled water with Tween 80 (0.05% concentration) (Sigma–Aldrich, London, UK) and shaken for 10 min. The spore concentration in the suspension was determined in a Bürker chamber under a light microscope [33,37].

The fungi's spore germination ability was also assessed; to do this, a small amount (50 µL) of spore suspension was transferred by micropipette into a cavity on basic glass (so-called glass with a tear). The sheets of glass were placed in Petri dishes into which a small amount of distilled water was poured to prevent the spore suspension on the basic glass from drying out. After 24 h, the sheets of glass with a tear were placed under a scaled microscope to check the number of germinating spores. Germinated conidia were identified as those with germ tubes longer than the width of an ungerminated conidium [38,39]. To evaluate the effect of the EMF on the growth on the germ tubes, their length was measured 48 h after the start of the experiment. In total, 200 hundred conidia were examined for each germination and germ tube length test. Tests were performed in four replications.

The pathogenicity of the entomopathogenic fungi was assessed on the basis of the mortality of test insects treated with spores of the respective fungi. The test insects were *Tenebrio molitor* mature larvae of similar weight (ca. 140 mg). A total of 10 insects were used for each repetition. Insects were placed in sterile Petri dishes with moistened filter paper. The insects were then sprayed with 1 mL of a spore suspension of the tested fungus at a concentration of 1×10^7 mL⁻¹. The control insects were sprayed with distilled water. All dishes containing insects were kept in the same conditions: in the dark, with a temperature of 22 °C. The experiments were carried out in 4 replications. Insect mortality was checked every 24 h for 10 days. Dead larvae were put into Petri dishes lined with filter paper moistened with sterile distilled water. The mycelium development of EPFs on their bodies was the confirmed cause of their mortality.

2.4. Statistical Analyses

An analysis of variance (ANOVA) was used to determine the significance of the results. A post-hoc Tukey HSD test ($p = 0.05$) was performed to assess the significance of differences between means. Cumulative mortality data were corrected for natural (control) mortality. Prior to ANOVA, data for the test insects' mortality were subjected to arcsine transformation ($\arcsin \sqrt{x}$) and data for sporulation were subjected to log transformation to obtain normally distributed data sets. Data are presented as the mean \pm SD (standard deviation). In tables and figures, the data without transformation are shown. All statistical analyses were performed using EXCEL (Microsoft® Office 2007) and Statistica 12 [40].

3. Results

Analyses of the colony growth of EPFs after seven days' exposure revealed that the tested strains of entomopathogenic fungi were sensitive to exposure to 900 and 1800 MHz electromagnetic fields (Table 1). The diameter of the *B. bassiana* mycelium not treated with the EMF was 2.2 cm. In the object exposed to the 900 and 1800 MHz EMFs, the colony diameters were 3.1 cm and 1.9 cm, respectively (Figure 1). The diameter of the *C. fumosoroseus* mycelial colony treated with the higher-frequency EMF was 4.0 cm, while the diameter of the control object and that treated with a lower frequency were 2.9 and

2.8 cm, respectively (Figure 2). The diameter of the mycelial colony of *M. anisopliae* in the control group and that under exposure to a lower-frequency EMF did not significantly differ. However, the diameter of the *M. anisopliae* colony exposed to the lower EMF frequency was significantly larger than in the one exposed to the 1800 MHz electromagnetic field (Figure 3). Exposure to the 900 MHz frequency electromagnetic field had a stimulating effect on the colony growth of all of the tested EPFs (Table 2).

Table 1. The effect of exposure to 900 and 1800 MHz EMFs on the colony growth (after seven days) of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Colony Diameter [cm] ± SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
Control	2.20 abc ± 0.268	2.87 cd ± 0.160	2.15 abc ± 0.065
900 MHz	3.12 d ± 0.210	4.02 e ± 0.025	2.87 cd ± 0.240
1800 MHz	1.91 a ± 0.074	2.77 bcd ± 0.062	2.07 ab ± 0.070

Values within particular columns and rows marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

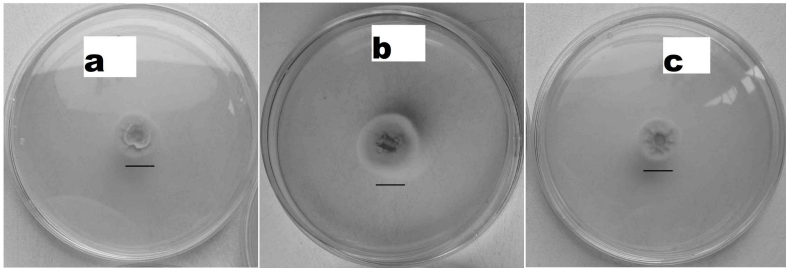


Figure 1. The effect of exposure to 900 and 1800 MHz EMFs on the colony growth (after seven days, reverse side) of the entomopathogenic fungi *B. bassiana*. ((a)—control; (b)—900 MHz; (c)—1800 MHz; bar = 1 cm).

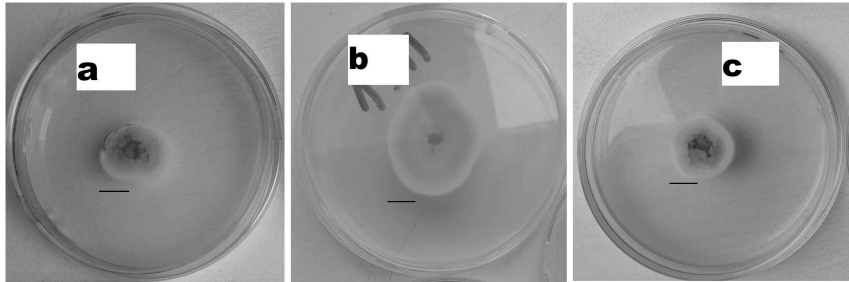


Figure 2. The effect of exposure to 900 and 1800 MHz EMFs on the colony growth (after seven days, reverse side) of the entomopathogenic fungi *C. fumosorosea*. ((a)—control; (b)—900 MHz; (c)—1800 MHz; bar = 1 cm).

The colony growth of EPFs after 14 days (seven days after the termination of exposure to the EMF) differs significantly depending on the applied frequency of the electromagnetic field (Table 3) and the fungus species. A significant stimulating effect was observed when fungi were exposed to a 900 MHz electromagnetic field (Table 4). The linear growth of *C. fumosorosea* and *M. anisopliae* in the control group and in objects exposed to 1800 MHz did not differ significantly. However, when comparing the mean value for all tested EPFs, those exposed to 1800 MHz showed significantly inhibited colony growth after 14 days. Exposure to a 900 MHz electromagnetic field had a stimulating effect on the growth rate of

all of the tested EPFs (Figure 4). However, the 1800 MHz EMF was not observed to have a significant effect on the growth rate of the EPFs.

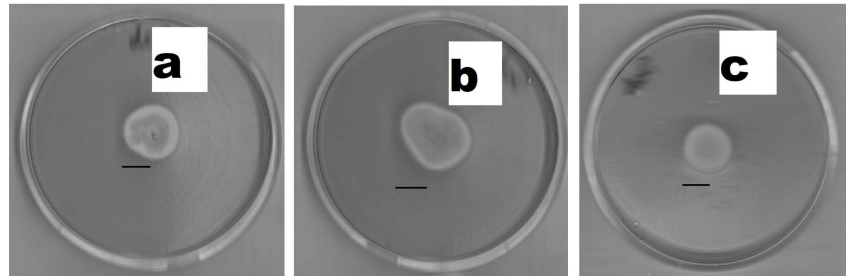


Figure 3. The effect of exposure to 900 and 1800 MHz EMFs on the colony growth (after seven days, reverse side) of the entomopathogenic fungi *M. anisopliae*. ((a)—control; (b)—900 MHz; (c)—1800 MHz; bar = 1 cm).

Table 2. The inhibition/stimulation effect of exposure to 900 and 1800 MHz EMFs on the colony growth (after seven days) of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Inhibition/Stimulation Coefficient [%] \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
900 MHz	$-42.0 \text{ a} \pm 9.53$	$-40.0 \text{ a} \pm 0.87$	$-33.7 \text{ a} \pm 11.13$
1800 MHz	$13.1 \text{ b} \pm 3.34$	$3.7 \text{ b} \pm 2.14$	$3.5 \text{ b} \pm 3.28$

Values within particular columns marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

Table 3. The effect of exposure to 900 and 1800 MHz EMFs on the colony growth (seven days after the termination of exposure to the EMF) of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Colony Diameter [cm] \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
Control	$6.45 \text{ b} \pm 0.202$	$7.25 \text{ c} \pm 0.132$	$7.35 \text{ c} \pm 0.096$
900 MHz	$7.27 \text{ c} \pm 0.085$	$8.10 \text{ d} \pm 0.071$	$8.30 \text{ d} \pm 0.071$
1800 MHz	$6.05 \text{ a} \pm 0.096$	$7.05 \text{ c} \pm 0.119$	$7.20 \text{ c} \pm 0.041$

Values within particular columns and rows marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

Table 4. The inhibition/stimulation effect of exposure to 900 and 1800 MHz EMFs on the colony growth (seven days after the termination of exposure to the EMF) of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Inhibition/Stimulation Coefficient [%] \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
900 MHz	$-12.8 \text{ a} \pm 1.32$	$11.7 \text{ a} \pm 0.97$	$-12.9 \text{ a} \pm 0.96$
1800 MHz	$6.2 \text{ b} \pm 1.48$	$2.7 \text{ b} \pm 1.64$	$2.0 \text{ b} \pm 0.55$

Values within particular columns marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

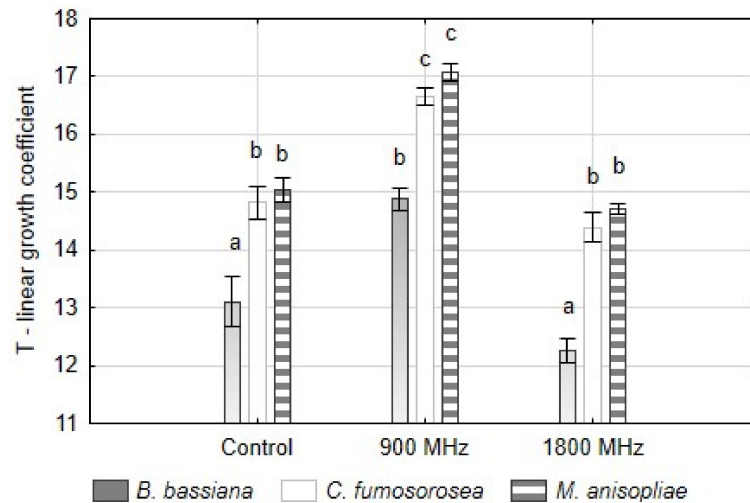


Figure 4. The effect of exposure to 900 and 1800 MHz EMFs on the colony growth rate (T—linear growth coefficient) of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*. a, b, c—bars indicated with the same letter do not differ significantly ($p \leq 0.05$). I—standard deviation.

The sporulation of the entomopathogenic fungi *B. bassiana* was significantly inhibited by the 1800 MHz electromagnetic field (Table 5). The highest sporulation of *B. bassiana* was observed when the 900 MHz electromagnetic field was used. The sporulation of *M. anisopliae* was affected by the EMF used in the experiment. The sporulation of *M. anisopliae* was highest when the 900 MHz electromagnetic field was used. Generally, the 900 MHz frequency significantly stimulated the sporulation of *C. fumosorosea* and *M. anisopliae* (Table 6).

Table 5. The effect of exposure to 900 and 1800 MHz EMFs on the sporulation of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Number of Spores [108] \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
Control	1.82 b \pm 0.042	19.8 c \pm 0.312	28.4 de \pm 0.591
900 MHz	1.93 b \pm 0.027	22.5 cd \pm 0.382	32.9 e \pm 0.842
1800 MHz	1.42 a \pm 0.062	18.0 c \pm 0.405	28.5 de \pm 0.431

Values within particular columns and rows marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

Table 6. The inhibition/stimulation effect of exposure to 900 and 1800 MHz EMFs on the sporulation of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Inhibition/Stimulation Coefficient [%] \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
900 MHz	−6.0 a \pm 1.49	−14.0 a \pm 1.93	−15.8 a \pm 2.97
1800 MHz	22.0 b \pm 3.42	8.9 b \pm 2.05	−0.5 b \pm 1.52

Values within particular columns marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

The percentage of germinating spores in the control depended on the tested fungus species, ranging from 95% for *M. anisopliae* to about 99% for *B. bassiana* and *C. fumosorosea*

(Table 7). The EMF was observed to have an inhibitory effect in the case of *B. bassiana* for both the lower and the higher EMF frequencies (Table 8). *B. bassiana* spores treated with 900 and 1800 MHz germinated in only 85.5 and 86.5% of cases, respectively. The exposure of *C. fumosorosea* to 900 MHz did not cause any significant change in the percentage of germinating spores. However the exposure to the 1800 MHz EMF resulted in a slight reduction in the germination of *C. fumosorosea* spores. The 900 MHz EMF affected the germination of *M. anisopliae* spores. Spore germination was lower than in the control group (91.8%). Generally, both the 900 MHz and the 1800 MHz frequencies reduced the percentage of spore germination.

Table 7. The effect of exposure to 900 and 1800 MHz EMFs on the spore germination of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Percent of Germinating Spores \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
Control	98.3 d \pm 0.48	99.3 d \pm 0.48	95.0 cd \pm 1.29
900 MHz	85.5 a \pm 2.75	96.8 d \pm 0.48	91.8 bc \pm 0.85
1800 MHz	86.5 a \pm 2.22	88.8 ab \pm 1.25	95.8 cd \pm 0.75

Values within particular columns and rows marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

Table 8. The inhibition/stimulation effect of exposure to 900 and 1800 MHz EMFs on the spore germination of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Inhibition/Stimulation Coefficient [%] \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
900 MHz	12.9 a \pm 2.80	2.5 a \pm 0.48	3.4 b \pm 0.89
1800 MHz	11.9 a \pm 2.26	10.6 b \pm 1.26	−0.8 a \pm 0.79

Values within particular columns marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

The effect of the electromagnetic field on the growth of the germ tube emerging from the spore was also examined (Table 9). In the control, the average length of the germinating *B. bassiana* hyphae was 2.5 μ m. In the objects treated with an electromagnetic field, the length of the germinating hyphae ranged from 2.12 (900 MHz) to 0.98 μ m (1800 MHz). In the case of *C. fumosorosea*, stimulation of hyphae development was observed under exposure to both EMF frequencies. However, in the case of *M. anisopliae*, the lower-frequency EMF stimulated hyphal development and the higher frequency caused inhibition (Table 10). Generally, the 900 MHz frequency significantly stimulated the growth of *C. fumosorosea* and *M. anisopliae* germ tubes.

Table 9. The effect of exposure to 900 and 1800 MHz EMFs on the germ tube lengths of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae* spores.

Treatment	Fungi Species Germ Tube Length [μ m] \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
Control	2.47 abc \pm 0.096	3.43 bcd \pm 0.148	2.56 abc \pm 0.053
900 MHz	2.12 ab \pm 0.073	4.16 cd \pm 0.170	4.66 d \pm 0.257
1800 MHz	0.98 a \pm 0.381	4.77 d \pm 0.342	1.82 ab \pm 0.331

Values within particular columns and rows marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

Table 10. The inhibition/stimulation effect of exposure to 900 and 1800 MHz EMFs on the germ tube lengths of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Treatment	Fungi Species Inhibition/Stimulation Coefficient [%] \pm SD		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
900 MHz	14.3 a \pm 2.93	−21.3 a \pm 4.96	82.5 a \pm 10.05
1800 MHz	60.5 b \pm 15.40	−39.1 a \pm 9.96	28.9 b \pm 12.95

Values within particular columns marked with the same letter do not differ significantly ($p \leq 0.05$). SD—standard deviation.

The mortality of the *T. molitor* larvae treated with EPFs after their exposure to 900 and 1800 MHz electromagnetic fields is presented in Table 11. The pathogenicity of *B. bassiana*, *C. fumosorosea*, and *M. anisopliae* did not differ significantly in the untreated control groups. There was no significant difference in the pathogenicity of the fungi *B. bassiana* and *M. anisopliae* exposed to electromagnetic fields and the untreated control groups. Only in the case of *C. fumosorosea* was a stimulating effect observed on its pathogenicity against the test insects—when exposed to the 900 MHz electromagnetic field. On average, the pathogenicity of the fungi exposed to 1800 MHz was significantly lower than those exposed to the 900 MHz electromagnetic field.

Table 11. The effect of exposure to 900 and 1800 MHz EMFs on the pathogenicity of *B. bassiana*, *C. fumosorosea*, and *M. anisopliae* against *T. molitor* larvae.

Treatment	Fungi Species Mortality of Larvae [%]		
	<i>B. bassiana</i>	<i>C. fumosorosea</i>	<i>M. anisopliae</i>
Control	87.5 ab \pm 4.78	80.0 a \pm 4.08	90.0 ab \pm 4.08
900 MHz	87.5 ab \pm 2.50	97.5 b \pm 2.50	90.0 ab \pm 4.08
1800 MHz	67.5 a \pm 2.50	77.5 a \pm 2.50	87.5 ab \pm 2.50

Values within particular columns and rows marked with the same letter do not differ significantly ($p \leq 0.05$).

4. Discussion

Exposure to an EMF may affect the growth of fungal mycelia [41]. Ruzic et al. [42] found that the growth of the mycorrhizal fungus *Pisolithus tinctorius* can be stimulated by a low-frequency field of 50 Hz at a density 0.025 and 0.1 mT. This magnetic field also increased the ergosterol content in the fungus mycelium [40]. Ergosterol is a component of fungal cell membranes and is important for fungal growth and their ability to adapt to environmental stresses [43]. Other authors did not find EMFs to have any effect on fungal growth [44]. It should be emphasized that both the type of EMF as well as the type of organism used in the experiment may affect the results [41,45]. The present study has revealed that exposure to 900 and 1800 MHz EMFs may significantly affect the colony growth of EPFs. However, the effect depends on the EMF frequency and the EPF species. The lower-frequency EMF used in the present experiment significantly affected the linear growth of *M. anisopliae*, *C. fumosorosea*, and *B. bassiana* when they were exposed for seven days to an electromagnetic field. The fungal growth was evaluated not only immediately after the seven days of exposure to the EMF but also seven days after the end of the treatment. Under 900 MHz EMF exposure, the colony diameter was significantly larger than in the untreated control group. This means that the stimulating effect of the lower-frequency EMF was observed not only when it was applied but also as a subsequent effect. The growth of *B. bassiana* was significantly inhibited by the 1800 MHz EMF. The growth of *C. fumosorosea* and *M. anisopliae* was also inhibited, but the effect was weaker. Albertini et al. [46] found that exposure to a static magnetic field inhibits the mycelia growth of *Fusarium culmorum*. According to Nagy and Fischl [47], a static magnetic field of 0.1 mT flux density decreased the growth

of plant pathogenic fungal colonies. However, other authors have suggested that a static magnetic field may stimulate development of EPFs [32]. Anaya et al. [48] concluded that an oscillating magnetic field (OMF) of 60 Hz/220 V and low density values (1–5 mT) stimulate the colony growth and physiology of filamentous fungi. Veerana et al. [16] showed that a radio-frequency electromagnetic field (RF-EMF) can enhance vesicle accumulation in the hyphae of the fungus *Aspergillus oryzae*. Vesicles have many functions in the lives of fungi [49–51]. They are involved in creating wall architecture, as well as the transportation of nutrients to the hyphal tip, which can be important for hyphal growth [52,53].

An important feature of EPFs is their ability to produce spores [38]. Sporulation depends on the fungal species, nutrient availability, and environmental factors like temperature or the presence of toxins or pesticides [54,55]. The sporulation of the entomopathogenic fungus *B. bassiana* was significantly inhibited by the 1800 MHz electromagnetic field. The inhibiting effect of EMFs on fungus sporulation has been confirmed by other authors [46]. Exposure to a static magnetic field (0.3 ± 0.03 T sMF) inhibited not only the colony growth of *Fusarium culmorum*, but also conidia formation [46], whereas Steffen et al. [56] reported that low-frequency electromagnetic fields stimulated the growth and sporulation of *Trichoderma asperelloides*. Similar results were obtained in the present study, as exposure to a 900 MHz EMF stimulated the sporulation of EPFs. The high sporulation of EPFs under in vitro conditions is advantageous for the mass production of these fungi.

An important aspect of mycoinsecticide quality is the concentration of propagules and their viability [38,39,57], which can be affected by many factors [38,58,59]. EMFs are one abiotic factor that can significantly affect fungus sporulation [46,48]. Albertini et al. [46] observed that exposure to a static magnetic field inhibited the germination of *Fusarium culmorum* conidia. In the present experiment, both lower and higher EMF frequencies were observed to have an inhibitory effect on the spore germination of *B. bassiana*. The spore germination of *C. fumosorosea* was inhibited only by the 1800 MHz EMF. The germination of *M. anisopliae* spores was affected by the EMF to a small extent only at the lower frequency. The proportion of fast-germinating conidia is an important factor in predicting the potential efficacy of EPF products [39]. The inhibiting effect of an EMF on spore germination observed in the present experiment appears to be small and dependent on the species but should be taken into account in attempts to use an EMF to stimulate EPF activity.

The germination of conidia and the formation of germ tubes is an important stage in the process of host infection [60,61]. Slow formation and growth of the germ tubes may adversely affect this process [46]. Exposure to the 900 MHz EMF either did not affect the growth of germ tubes (*B. bassiana* and *C. fumosorosea*) or significantly stimulated it (*M. anisopliae*). Inhibition of the hyphae development of *B. bassiana* and *M. anisopliae* was observed under exposure to the 1800 MHz electromagnetic field. Sztarfrowski et al. [62] also observed a static magnetic field to have a significant inhibition effect on *Candida albicans*' hyphal length. However, in the present study, we observed the EMF to have a subsequent effect. The spores germinated and grew without direct exposure to a 900 or 1800 MHz EMF. This means that the effect of exposure to an EMF lasts longer and can affect fungi in further stages of their development.

The pathogenicity of entomopathogenic fungi depends on many factors, including biotic (strain and host) and abiotic ones (pollutants, weather, and soil conditions) [63–65]. Jaworska et al. [32] concluded that, directly applied, a static magnetic field stimulates the pathogenicity of EPFs against *T. molitor* larvae. In their experiment [32], a static magnetic field was applied on two-week-old sporulating mycelium. The pathogenicity of *C. fumosorosea* and *M. anisopliae* was not significantly affected by exposure to a 1800 MHz EMF. However, a 900 MHz electromagnetic field was observed to have a stimulating effect on *C. fumosorosea*'s pathogenicity against the test insects. It is important that in the present experiment, only the subsequent effect of the electromagnetic field was studied—spores that were produced under exposure to an electromagnetic field were used to prepare a water suspension. As exposure to an EMF may induce biochemical changes in fungi [46], the observed stimulation or inhibition can probably be explained with this mechanism.

However, further studies on the effect of an EMF on the biochemical characteristics of EPFs are necessary.

EMFs are regarded as stress factors that can cause changes in the morphology and physiology of organisms [66,67]. Exposure to 2.4 GHz radiation was found to cause oxidative damage to the fungus *Serpula himantioidea* [66]. Increased ergosterol and fatty acid content in *S. himantioidea* was also observed, which was connected with defense mechanisms to stress factors. Also, the conditions under which fungi are grown may affect their stress tolerance [68,69]. Dias et al. [69] concluded that light irradiance during the growth of EPN stimulates a higher tolerance of the produced conidia to osmotic and oxidative stress. However, nutritional stress had a stronger positive effect on the stress tolerance of EPF conidia [69]. The reactions of the EPFs observed in the presented study may also be the result of the stress of being exposed to an EMF and the defense mechanisms induced by it.

5. Conclusions

1. The reaction of *B. bassiana*, *C. fumosorosea*, and *M. anisopliae* to EMF exposure depended on the investigated fungus species and the applied frequency.
2. Exposure to a 900 MHz electromagnetic field stimulated the linear growth of the mycelium of *B. bassiana* and *C. fumosorosea* and the pathogenicity of *C. fumosorosea*.
3. Exposure to a 900 MHz electromagnetic field stimulated the sporulation of the entomopathogenic fungus *M. anisopliae*.
4. A 1800 MHz electromagnetic field inhibited the sporulation and spore germination of *B. bassiana*.
5. The study suggests the need for further studies on the effect of a 900 MHz electromagnetic field on the growth and pathogenicity of the entomopathogenic fungi *B. bassiana*, *C. fumosorosea*, and *M. anisopliae*.

Author Contributions: Conceptualization, D.R.R., K.F. and K.P.; methodology D.R.R., K.F. and K.P.; software, K.B.; validation, K.B. and M.L.; formal analysis, D.R.R.; investigation, K.F.; resources, K.B.; data curation, M.L.; writing—original draft preparation, D.R.R.; writing—review and editing, D.R.R., K.F. and K.P.; visualization, K.B.; supervision, K.F.; project administration, D.R.R.; funding acquisition, D.R.R., K.F., K.B. and K.P. All authors have read and agreed to the published version of the manuscript.

Funding: The research was founded by the University of Agriculture in Krakow, grant number 010014-11.

Institutional Review Board Statement: Not applicable.

Informed Consent Statement: Not applicable.

Data Availability Statement: The original contributions presented in this study are included in the article. Further inquiries can be directed to the corresponding author.

Conflicts of Interest: The authors declare no conflicts of interest.

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Natalie Campion

Subject: FW: Proposed Optus Tower at Eltham Lower Park: Objections by the Friends of the
Eltham Copper Butterfly
Attachments: Proposed Optus Tower, ELP, objection, FoECB, FS.pdf

From: [REDACTED] >

Sent: Monday, July 21, 2025 9:32:35 PM

To: [REDACTED]

Subject: Proposed Optus Tower at Eltham Lower Park: Objections by the Friends of the Eltham Copper Butterfly

Dear Councillors,

Attached is a detailed submission objecting to the proposed mobile telecommunications tower at Eltham Lower Park (ELP) prepared in my role as co-convenor of the Friends of the Eltham Copper Butterfly (FoECB). The attached paper expands on the detail underlying the arguments contained in my submission lodged via the Participate Nillumbik webpage.

A colony of Eltham Copper Butterflies (ECB) was found at Hohnes Hill in December 2021. Habitat restoration work undertaken by volunteers and Council appointed contractors has led to a strong recovery of the ECB population at this location over the last three plus years. This colony now represents a significant proportion of the butterfly population (around 13% of Eltham's ECBs).

It is now generally accepted that electromagnetic radiation from 5G on humans generally does not have a major deleterious effect. However, there is growing evidence in the scientific literature expressing concerns about the thermal and non-thermal biological effects on insects of electromagnetic fields (EMFs) associated with 5G technology. Most of the host plants for this colony are located within 60 to 90 m of the proposed mobile tower site.

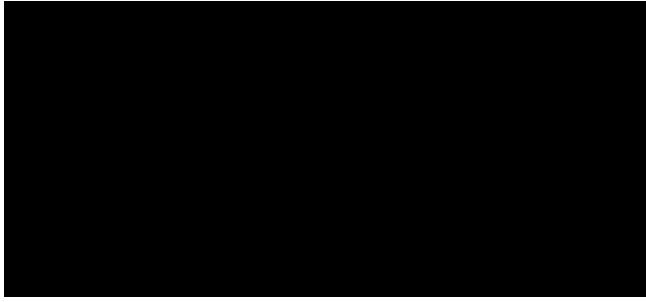
The attached paper argues this situation triggers the operation of the Commonwealth's *Environment Protection and Biodiversity Act* because the ECB is listed as a threatened species under that Act. The Act also imposes an obligation on decision makers (including Council) to apply the precautionary principle in considering development applications.

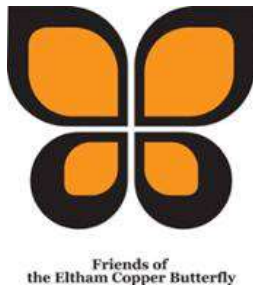
I look forward to further dialogue on the issues raised.

Be well

[REDACTED]

**PCC.010/25 Indara Corporation P/L lease proposal for Optus telecommunications infrastructure at
Eltham Lower Park
Attachment 2. Submissions - redacted**





TELECOMMUNICATIONS INFRASTRUCTURE AT ELTHAM LOWER PARK: OBJECTIONS TO THE INDARA LEASE PROPOSAL

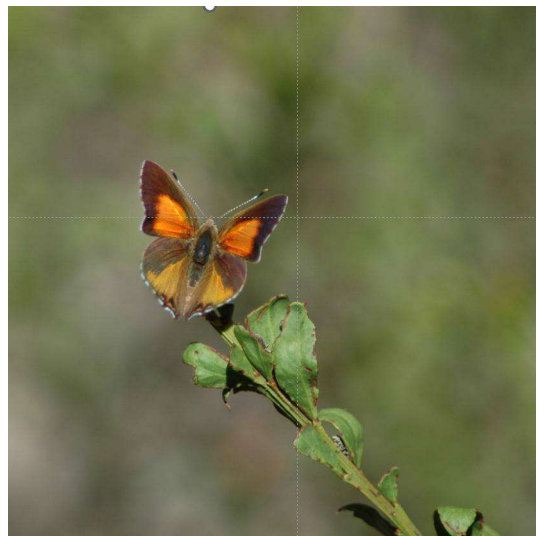
Detailed Submission Addressing Issues Associated with the Eltham
Copper Butterfly Colony at Hohnes Hill



Co-convenor

Friends of the Eltham Copper Butterfly

21 July 2025





I am writing this submission objecting to the proposed mobile telecommunications tower at Eltham Lower Park (ELP) in my role as co-convenor of the Friends of the Eltham Copper Butterfly (FoECB).

- This detailed paper expands on the underlying arguments contained in my submission lodged via the Participate Nillumbik webpage.

This submission provides:

- A summary of the objections presented in this paper (see Section 1)
- Background context, including information on
 - The presence of Eltham Copper Butterflies (ECBs) at the Hohnes Hill reserve, adjacent to the proposed tower location
 - The provisions in place to protect threatened species, including ECBs, listed under the Commonwealth *Environment Protection and Biodiversity Conservation Act, 1999* (EPBC Act)
 - A summary of recent scientific evidence on the deleterious effects of 5G on insects, and
- Detail of four objections based on the status of the ECB as a ‘threatened species’ listed under the EPBC Act, and misalignment with Council’s own Biodiversity Strategy (see Section 3).

1. OBJECTIONS TO THE PROPOSED TOWER LOCATION: SUMMARY

Objection 1: Risk of *significant impact* on ECBs under criteria specified in the EPBC Act: the proposed tower site is around 70 to 100 metres from known ECB larvae habitat. Recent scientific studies in reputable peer-reviewed journals suggest *radio frequency electro magnetic radiation* (RF—EMR) may induce heating and behavioural disruptions in insects, potentially threatening ECB reproduction and survival. This risk meets the criteria of "significant impact" under EPBC guidelines. It is noteworthy that where a species like the ECB is listed under the Act, the Commonwealth Minister and agencies are required to apply *the precautionary principle* (Section 3A(b) i.e., lack of full scientific certainty should not justify ignoring the risks of an action.

Objection 2: Failure by the developer to refer the proposal under the EPBC Act: Indara has not referred the proposed action to the Commonwealth for assessment. Under the EPBC Act, referral is mandatory if there is a real chance of significant impact to a listed threatened species. Construction must be deferred until this referral occurs.

Objection 3: Failure by Land Manager (Council) to Refer Action: Nillumbik Shire Council, as land manager responsible for Hohnes Hill reserve, has a shared legal duty to refer actions that may significantly impact a listed species. No referral has been made. Council must delay any authorisation of the development to avoid breaching the EPBC Act.

Objection 4: Inadequate Policy Context in Officer Report: The Officer’s Report to Council lacks proper assessment of:

- . The Environmental Significance Overlay (ESO) applicable to Hohnes Hill
- . Other overlays operable at Eltham Lower Park, and
- . Neglects to align the proposal with Council’s Biodiversity Strategy 2024–34, particularly Objective 1.1 on *integrating biodiversity into decision-making*.

2. CONTEXT

2.2.1 Eltham Copper Butterfly Presence at Hohnes Hill Reserve

The Hohnes Hill Flora Reserve (Hohnes Hill) directly borders the site of the proposed telecommunications tower. ECBs were first observed at Hohnes Hill in 1988 (Vaughan, 1988). However, no ECBs were seen at the site from the late 90s through to the early 2000s.

In 2013 Nillumbik Shire Council commissioned the ecologist Karl Just to undertake a flora and fauna survey at all Nillumbik locations where ECBs had previously been observed, including Hohnes Hill. The survey was enabled by a Victorian Government grant funded by the then Department of Sustainability and Environment. Just's 2014 report observed that ECBs were:

“not recorded at (Hohnes Hill) for over a decade” (Just, 2014, p. 44)

In December 2021 the Parks Victoria Ranger and ecologist, Cam Beardsell, and local ecologist Garry French re-identified ECBs at Hohnes Hill, at a new location within the reserve, along the track accessed at the north-east corner of the reserve (opposite the Play Group house); this track runs roughly parallel to the Hohnes Road fence line.

The primary method used to assess ECB population levels is larvae counts in the September/ October period (prior to pupation around November). ECBs typically emerge as adult butterflies from mid-November through to end January (although some adults have been recorded flying as late as April).

In the subsequent September 2022 survey, 17 ECB larvae were counted on 8 *Bursaria spinosa* plants (Wildlife Ecology, 2023).



Figure 1: One of the eight *Bursaria spinosa* host plants where newly located ECB larvae at Hohnes Hill reserve were identified in the September 2022 larvae counts, approximately 90 m from the proposed Optus Tower



Figure 2: details of the ECB larvae count tag applied to the newly located colony, to enable monitoring of larvae counts and overall colony size. Note the number, indicating plant was identified in the September 2022 count.

Since then, habitat restoration work (coppicing and weed removal) conducted by volunteers and contractors has led to a significant population recovery.



In the September / October 2024 larvae counts funded by Council there were 243 larvae recorded on 80 plants. Figure 3 and 4 on the next page show the colony’s reinvigoration in response to the habitat restoration.

Figure 3:
*Hobnes Hill colony,
September 2022
(coloured dots show
host larvae plants)*



Figure 4:
*Hobnes Hill colony,
September 2024
(coloured dots show
host larvae plants)*





These figures now place Hohnes Hill as the third most populous of the 11 Eltham ECB colonies, comprising 13 % of the total Eltham ECB population

- Pauline Toner Reserve has the most (901 larvae, 48%) and Western Colony, Diosma Rd (527 larvae, 28%).¹

Unlike the other colonies clustered around in Woodridge, the Hohnes Hill ECB colony is geographically distinct, adding to its importance as a buffer population in case of catastrophic events, such as wildfire.

2.2.2 ECBC Act, Listing and Relevance to the Proposed Development

Under the EPBC Act provisions **a person (including developers and local councils) must refer a proposed action to the Australian Government if that action has, will have, or is likely to have a significant impact on a *matter of national environmental significance*** (see Sections 68-70 and 75 of the Act). A matter of national significance includes actions that affect the well-being of a listed threatened species.

These provisions of the Act apply to the ECB (*Paralucia pyrodiscus lucida*) because it was listed as a threatened species under the ECBC Act in 2016.

Guidance about what constitutes a significant action affecting a threatened species is provided by the *Significant Impact Guidelines 1.1 – Matters of National Environmental Significance* issued under the EPBC Act. The Guidelines describe threshold considerations that will determine if an action may have a *significant impact*. This includes any action that leads to:

- A long-term decrease in the size of a population
- A reduction in the area of occupancy of the species
- Fragmentation of an existing population into two or more populations
- Disruption of the breeding cycle of a population
- Modification, destruction, removal, isolation, or reduction of the availability or quality of habitat to the extent that the species is likely to decline.

This submission contends that all 5 of these ‘significant impact’ provisions are potentially relevant to the Hohnes Hill ECB population.

Another key provision of the EPBC Act incorporates **the precautionary principle**.

The precautionary principle was stated by the United Nations Conference on Environment and Development via the Rio Declaration of 1992. This says that:

“In order to protect the environment, the precautionary approach shall be widely applied by [jurisdictions] according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”

United Nations Conference on Environment and Development (UNCED), Rio Declaration, 1992

¹ The 2024 ECB counts estimated there were 1,869 ECB larvae across 9 Nillumbik Shire locations (based on maps made available to the author as co-convenor of the FoECB). Larvae data for a further two sites – the Graves property and Pitt St Reserve – was not available at the time of preparing this submission, but these 2 further sites have relatively small populations.



The precautionary principle is explicitly embedded within Section 3A (b) of the EPBC Act. This section which states the following:

Section 3A — Principles of Ecologically Sustainable Development

In this Act, the principles of ecologically sustainable development are that:

(a).....

(b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

In other words, decision-making agencies should exercise caution in making decisions that may impact a listed threatened species. When considering actions that may affect the well-being of a listed species, they must apply the precautionary principle and avoid risk to that species, even where the scientific evidence is inconclusive.

2.2.3 Recent Scientific Evidence of the Deleterious Effects of 5G Radio-Frequency electromagnetic radiation (RF-EMR) on Insects

It is now generally accepted that RF-EMR from 5 G on humans generally does not have a major deleterious effect.

However, there is growing evidence in the scientific literature expressing concerns about the effects on insects of electromagnetic fields (EMFs) associated with 5G technology.

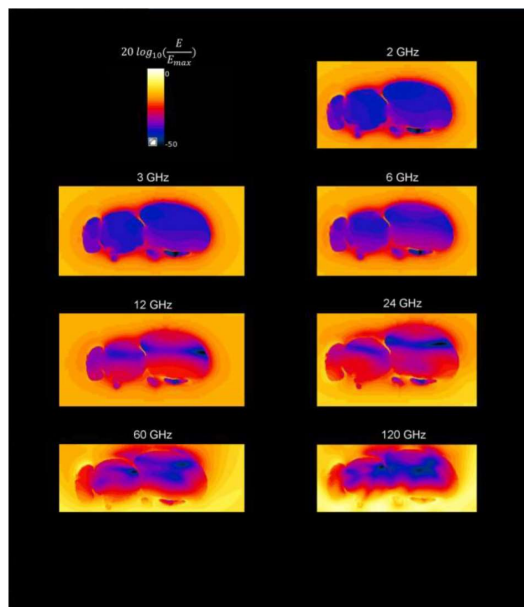
Cucurachi et al. (2013) in a review of 113 studies found that EMFs at levels present in the environment can influence insect development, reproduction, and navigation. Effects were often species-specific and more pronounced at higher frequencies.

A study by Thielens et al. (2018) investigated the absorption of radio-frequency electromagnetic radiation (RF-EMR) by four insect species (honeybee, beetle, mosquito, and fly). They found that RF absorption increased significantly with frequency (including in the 5G spectrum), particularly in the range of 6–120 GHz — frequencies proposed for 5G deployment at Eltham Lower Park. Using realistic 3D models of insects created with micro-CT scans and simulation methods, the study shows that absorption increases significantly at frequencies above 6 GHz, particularly when the wavelength is similar to the insect's body size.

Figure 5: This image is from the *Thielens et al. (2018)* study and shows how much **radio-frequency (RF) energy** a honeybee is modelled to absorb at different **frequencies, from 2 GHz to 120 GHz**—including those used in 5G.

As frequency increases, more of the bee's body lights up in red/yellow. This means the bee absorbs more energy at higher frequencies.

- *At low frequencies (2–3 GHz), the energy stays mostly on the outside of the bee's body.*
- *At higher frequencies (12–120 GHz), the energy penetrates more deeply and more parts of the bee's body absorb it.*
- *Around 24–60 GHz and beyond, there's a noticeable increase in total body exposure, which could lead to biological effects.*





This absorption can cause dielectric heating, potentially altering insect behaviour, physiology, and morphology over time. The results of Thielen et al's modelling suggest that even a 10% shift in RF power toward higher frequencies could increase absorbed power in insects by up to 370%, with smaller species most affected.

Findings from these studies suggest that insects are more susceptible to the effects of 5G EMFs than humans or other animals due to a range of factors:

- **Their small body size and surface-to-volume ratio:** insects are much smaller than humans and have a higher surface-to-volume ratio, making them more prone to absorbing EM radiation, particularly at higher frequencies where the wavelength is similar to insect body dimensions.
- **Resonance effects at high frequencies:** frequencies in the millimeter-wave range (used by 5G) overlap with the body sizes of many insects. This can lead to resonance effects, where energy absorption is disproportionately high. Humans are too large for such resonance effects to occur at these frequencies.
- **Lack of thermoregulation:** insects cannot regulate body temperature as effectively as mammals. Even small amounts of energy absorbed from EMFs could affect their metabolic processes.
- **Reliance on electromagnetic cues:** many insects use Earth's magnetic field and light polarization for navigation and communication. EMF interference could disrupt these systems.

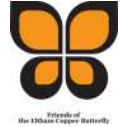
A study by Thill et al (2023) undertook a systematic review and meta-analysis of the results of studies investigating the toxicity of electromagnetic fields on insects, including low-frequency radiation (LF, e.g. power lines) and high-frequency radiation (HF, e.g. mobile networks). 587 publications were identified; after quality screening, 119 studies met inclusion criteria (64 LF, 55 HF). Of these, 53% of experiments (from 39% of studies) provided sufficient data for meta-analysis. Key findings were that:

- **Predominantly adverse effects:** laboratory studies consistently showed non-thermal biological impacts of EMR on insects; field results were less conclusive but suggestive
- **HF EMFs [i.e. mobile phone towers] were more impactful** than LF: Notably, exposure via mobile phones, DECT devices, and signal generators (e.g. towers) produced **statistically significant negative biological effects**
- **Biological effects documented:** effects spanned **reproduction, development, behaviour, orientation, metabolism, and DNA integrity**
- Studies consistently reported non-thermal disturbances, such as **oxidative stress** or **neurological impacts via ion channel disruption**.

Thill et al conclude their paper with a comment about implications of their study findings for future rollouts of technology, including 5G. Key extracts which deserve thoughtful consideration in the context of the Eltham Lower Park Optus Tower proposal are quoted below:

The 5G expansion is leading to a significant increase in EMF emissions, as suggested by recent measurements. Based on an assessment of the overall study situation on insects, we must warn against a careless deployment of further mobile telephony infrastructure, as harmful effects on insect populations would be likely, especially if interactions with other noxious agents are taken into account (including high-voltage power lines and artificial lighting). This might lead to further declines of already dwindling populations of pollinators, and would thereby entail costs for humanity....The ongoing 5G-deployment should be closely monitored, and toxicological testing for the evaluation of adverse effects should begin immediately, so that protective guidelines can be enacted....Toxic effects on insects may occur at radiation levels that are considered safe for humans, particularly in the higher frequency bands. We refer to the so-called precautionary principle, detailed in article 191 of the Treaty on the Functioning of the European Union. Pollinator conservation requires a stronger and broader application of the precautionary principle as currently practiced.

Thill, et al (2023, p.p. 863-864)



2.2.4 The precautionary principle: application to assessing the impact of 5G EMR under the EPBC Act

From the evidence presented in the section above, it's clear that the science of about the effects of 5G EMR is still evolving but is an issue of growing concern.

In such a context, it is important to apply the precautionary principle embedded in the EPBC Act. That is, the Commonwealth Minister and agencies making a decision affecting a listed threatened species (such as Nillumbik Shire Council) are legally required to consider the precautionary principle, including the potential effects of 5G EMR on a population of ECBs, even in the absence of scientific certainty.

2.2.5 Proximity of the Main Hohnes Hill ECB Colony to the Proposed Optus Tower

Representatives of Optus when lobbying for erection of the tower may refer to attenuation effects of the signal emitted by these towers. Attenuation is the gradual loss or weakening of a radio wave signal as it travels through space or through a material. In ideal conditions (open line-of-sight, no obstacles), power density (S) diminishes as $1/\text{distance}^2$. So, moving twice as far reduces exposure to a quarter.

It has been demonstrated that humans experience very low risk at >50 m from towers, due to rapid field attenuation. However, the findings of Thielens referred to above suggest that insects, especially small ones like ECB larvae and ants, can still absorb biologically meaningful RF energy even at moderate distances (e.g., 50–100 m), according to Thielens et al. and Thill et al. This supports a precautionary principle argument: low field strength alone doesn't guarantee safety for insects, due to their higher absorption efficiency and non-thermal sensitivity.

The author of this submission has mapped the distance of the newly found ECB colony on the north-east slope of Hohnes Hill proximate to the proposed tower. The results of that mapping are shown in Figure 6. This shows that the majority of the main Hohnes Hill ECB colony is at a distance of 50 to 100m from the proposed Optus Tower.

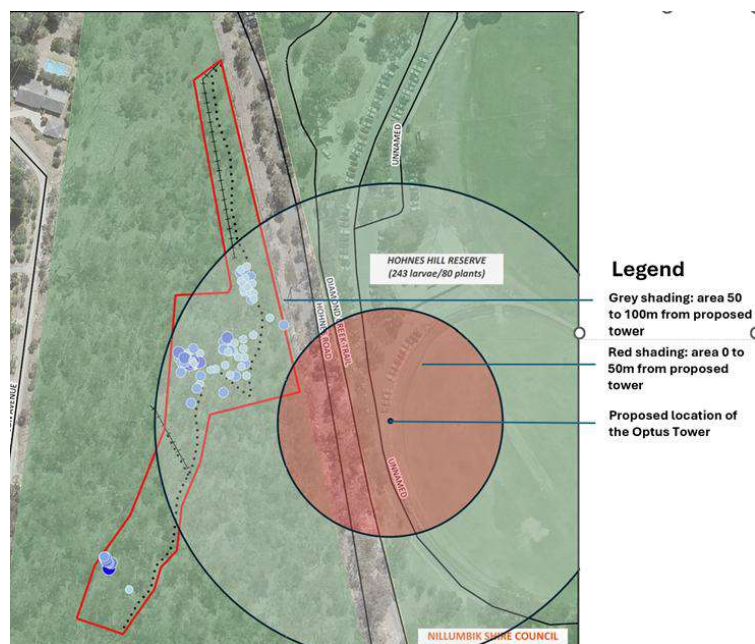


Figure 6: Distance of the main Hihnes Hill ECB colony from the proposed Optus Tower.



3.0 SPECIFIC OBJECTIONS TO THE ELTHAM LOWER PARK 5G TOWER PROPOSAL

Based on the contextual information provided in Section 2 above, I am lodging objections to the proposal for the current location of the 5G tower at Eltham Lower Park on four grounds. These are listed below.

Objection Ground #1: Risk of Significant Impact on ECBs

Bursaria spinosa plants supporting the new ECB colony along the track in the north east corner at Hohnes Hill are typically around 60 to 90 m from the proposed tower. The findings of Thielens, et al, provide credible evidence that:

- the ECB larvae and their symbiotic attendant ants (*Notoncus capitatus*)² on these plants could be adversely affected by 5G EMR emitted by the proposed tower due to possible thermal and non-thermal effects of the radiation;
- this may then affect the development, reproduction, and navigation of ECB larvae, and their attendant ants (*Notoncus capitatus*), and the subsequent flight and mating behaviour of ECB adults.

I submit the effect of proceeding with the proposed tower (the action) would constitute a significant impact on a listed threatened species- the ECB – in all of the following ways specified in the *Significant Impact Guidelines* issued under the authority of the EPBC Act:

- A long-term decrease in the size of a population
- A reduction in the area of occupancy of the species
- Fragmentation of an existing population into two or more populations
- Disruption of the breeding cycle of a population
- Modification, destruction, removal, isolation, or reduction of the availability or quality of habitat to the extent that the species is likely to decline

This would then constitute a matter of national significance under the EPBC Act, sections 68-69 and 75. Furthermore, the wording of the precautionary principle in Section 3A (b) in effect means “when there is credible concern about environmental damage, we should act to prevent it—even if all the science isn’t yet in.” i.e. don’t locate the tower in the current proposed location because the effects on the ECB could be irreversible.

Objection Ground #2: developers failure to refer the proposed action under the EPBC Act

Indara Corporation Pty Ltd has not made a referral for Federal assessment. This is a breach of the developer’s obligations under Section 69 of the EPBC Act.

Objection Ground #3: Council’s failure to refer as a land manager

Nillumbik Shire Council is the land manager responsible for day-to-day management of Hohnes Hill under the terms of a lease granted by the Crown to the Council in the early 1970s. Given the potential for significant impact, this is a breach of Council’s obligations under Section 70 of the EPBC Act.

² The attendant ants have two main functions in supporting ECB larvae: (1) shepherding the larvae on their evening journey to feed on *Bursaria spinosa* leaves, from March to end May and late August to mid-November. The larvae need protection from other hostile insects, including spiders, for the duration of their nightly feeding journeys.(2) Tending the larvae in the ant nests at the base of each host *Bursaria spinosa* plant in the larval phases (overnight after feeding and during winter, when they don’t feed), and during the pupation phase (typically later October through to mid-December).



Objection Ground #4: the officer's report is inadequate in its consideration of issues

The Officer's Report lacks consideration of a range of issues that could affect Councillor's consideration of how they exercise their authority, including:

- How the proposal affects application of the Environmental Significance Overlay that applies to Hohnes Hill
- The multiple other overlays operable at Eltham Lower Park, and
- Assessing conformity of the proposed tower construction with the principles of the Council's own Biodiversity Strategy, 2024-2034

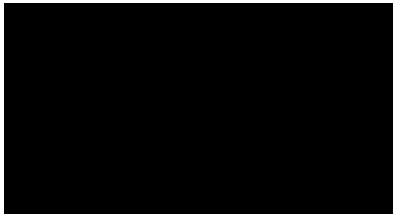
The Environmental Team could have provided advice on these issues. The lack of reference to these contextual issues in the Officer's Report points to possibly inadequate levels of engagement of relevant sections of the Council organisational structure in formulating the advice to Councillor's. For instance, the Biodiversity Strategy Action Plan for 2024-34 specifically committed Council to the following in 'Focus Area1, Objective 1: Leadership and Advocacy':

“ Consider biodiversity impacts and opportunities in day-to-day operations and when making Council decisions.”

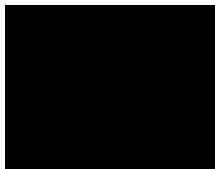
The Officer's Report failed in its analysis to consider Objective 1,1 of Focus Area 1 of the Biodiversity Strategy, 2024-2034, including supporting strategies 1.1, a to e.

Actions should be put in place to rectify this situation. This oversight should be remedied in all future Council decisions with biodiversity implications.

I look forward to the opportunity to further expand on any of the issues raised by this detailed submission.



21 July 2025



E: kinradew@gmail.com

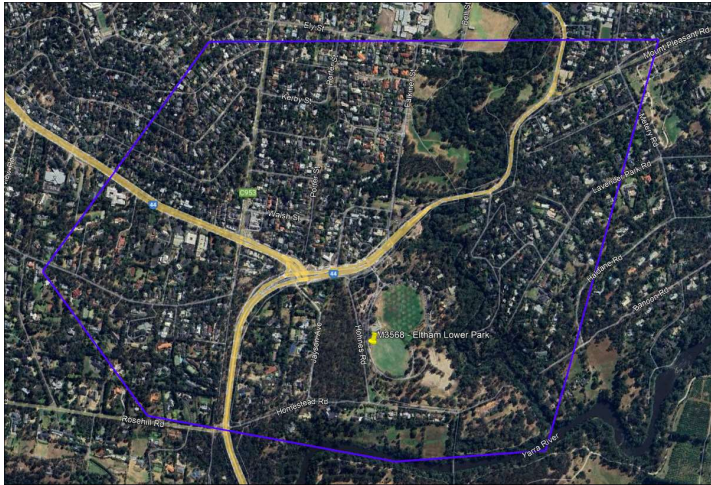
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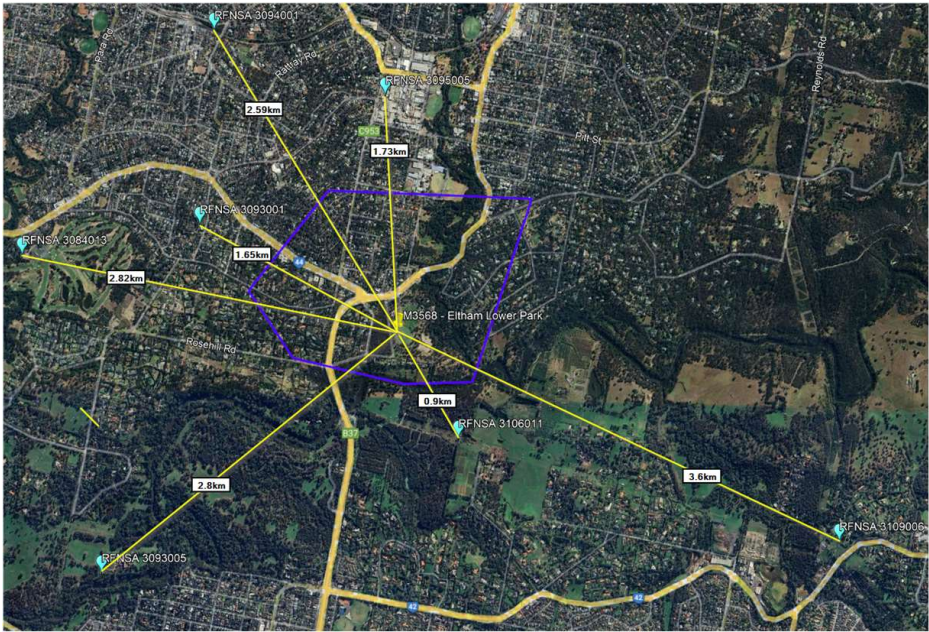
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1. Proposed Optus Site Location

Optus Site Name	Eltham Lower Park
Optus Site ID	M3568
Street Address	570 Main Road, Eltham VIC 3095
LGA Name	Nillumbik Shire Council
Coordinates (GDA94)	-37.735336, 145.139768
Proposed Optus Antenna Height (Azimuth)	31m (45/190/315)
Technology	4G, 5G
Lead Operator	Optus



Existing sites and Distance from new site proposal



Yellow Pin = Proposed Site Location
Blue Circle = Search Area

2. Optus Coverage Prediction Map from Proposed Site Location:



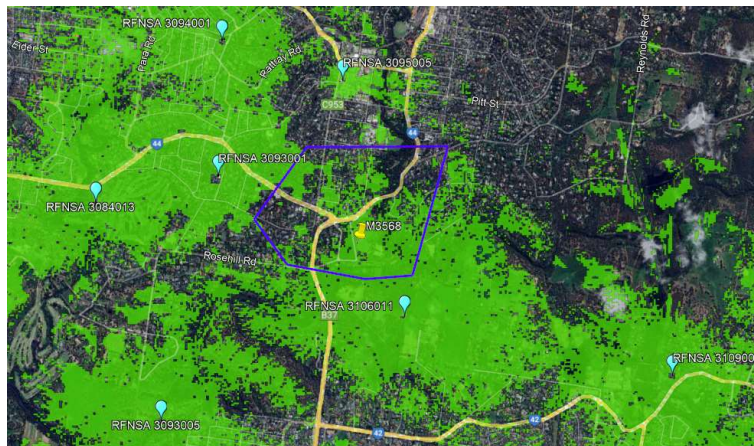
Coverage level plot green area depicts
Optus coverage from proposed candidate
for M3568 Eltham Lower Park

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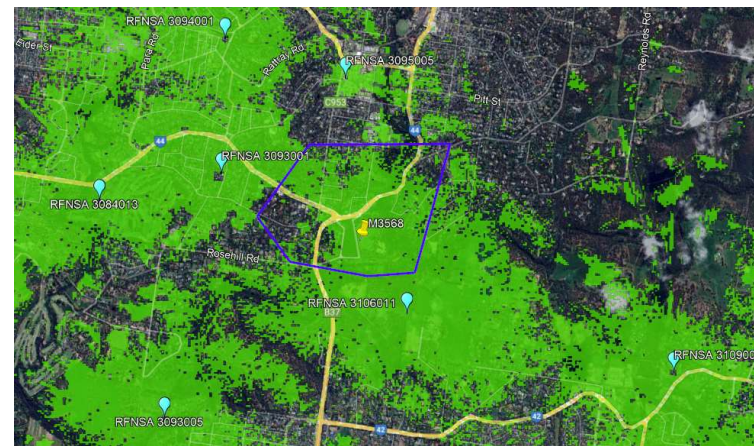
3. Coverage Benchmark (with & without Optus proposed site):

Coverage plots below show existing coverage with and without proposed M3568 Eltham Lower Park

Optus coverage level – Excluding M3568 Eltham Lower Park



Optus coverage level – Including M3568 Eltham Lower Park



Yellow Pin = Proposed Site Location
Blue Circle = Search Area

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Australian Government

Australian Radiation Protection
and Nuclear Safety Agency

Fact Sheet

Mobile Phone Base Stations and Health

Based on current research there are no established health effects that can be attributed to the low RF EME exposure from mobile phone base station antennas.

Introduction

There are mobile phone base station antennas on towers and buildings throughout Australia's populated areas. These antennas are part of the mobile phone network and they emit low level radiofrequency (RF) electromagnetic energy (EME). This fact sheet provides information about concern of adverse health effects arising from exposure to RF EME from base station antennas.

How does the mobile phone network operate?

When a call is made from a mobile phone, RF signals are transmitted between its antenna and the antenna at a nearby base station. The phone call is then routed through the phone network to the destination phone. Base station antennas must be elevated and located clear of physical obstruction to ensure wide coverage.

In an area of increasing mobile phone use the number of additional base stations needed to maintain service quality increases, even in areas where mobile network coverage already exists. If this is not done the mobile network will not operate properly and, as a result, mobile phone users may not be able to connect to their network.

Are base stations regulated in Australia?

The RF EME emissions from mobile phone base stations and other communications installations are regulated by the Australian Communications



and Media Authority (ACMA). The ACMA's regulatory arrangements require base stations to comply with the exposure limits in the ARPANSA RF Standard. The ARPANSA Standard is designed to protect people of all ages and health status against all known adverse health effects from exposure to RF EME. The ARPANSA Standard is based on scientific research that shows the levels at which harmful effects occur and it sets limits, based on international guidelines, well below these harmful levels.

The ACMA also requires base stations to comply with an industry code of practice which requires telecommunications carriers to inform and consult with the local community when planning, installing or upgrading base stations.

How much RF EME are people exposed to from base stations?

The maximum levels of exposure of RF EME from base stations may be calculated from details of the equipment installed. These calculations are made available in the ARPANSA EME reports provided by the telecommunications companies on the Radio Frequency National Site Archive website, www.rfnsa.com.au. The base station sites may be located by searching by postcode or town.

EME exposure to the public from base stations is typically hundreds of times below the limits of the ARPANSA RF Standard.

Do base stations cause any health effects?

Health authorities around the world, including ARPANSA and the World Health Organization, have examined the scientific evidence regarding possible health effects from base stations. Current research indicates that there are no established health effects from the low exposure to the RF EME from mobile phone base station antennas.

How about people who work very close to base station antennas?

Workers accessing rooftops and towers that house base station antennas must consult with building and facility management before entering the site. A guide to working safely near mobile phone base stations is available at <https://www.radioworksafes.com.au/>.

Conclusion

No adverse health effects are expected from continuous exposure to the RF EME emitted by the antennas on mobile phone base stations.

ARPANSA will continue to review the research into potential health effects of RF EME emissions from mobile phone base stations and other sources in order to provide accurate and up-to-date advice.

Useful Links

ARPANSA fact sheet on RF EME
www.arpansa.gov.au/RadiationProtection/basics/rf.cfm

The ARPANSA RF Standard
www.arpansa.gov.au/Publications/codes/rps3.cfm

WHO fact sheet on base stations
www.who.int/peh-emf/publications/facts/fs304/en/

AMTA information on Australian base stations
www.rfnsa.com.au
www.mobilesitesafety.com.au





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Acknowledgement of Traditional Owners

We acknowledge the Wurundjeri Woi-wurrung people as the Traditional Owners of the Country on which Nillumbik is located, we pay our respects to Elders past, present and future, and extend that respect to all First Nations People. We respect the enduring strength of the Wurundjeri Woi-wurrung and acknowledge that sovereignty was never ceded.

Inclusion statement

Nillumbik Shire Council is committed to creating a fair, equitable and inclusive community where human rights are respected, participation is facilitated, barriers are addressed and diversity is celebrated. We support the rights of all people regardless of age, gender, sexuality, ability or cultural identity. We value the diverse and changing nature of our community and understand that some groups and individuals experience more barriers than others.



Message from our Councillors

It is our great pleasure to present the Draft Council Plan 2025-2029, a plan that was developed through the valuable contributions and insights of our community. It reflects a shared vision for Nillumbik, a Shire that is inclusive, connected, sustainable and proud of its unique identity.

Since being elected in November 2024, we have been committed to developing a Council Plan that strongly aligns with the needs, priorities and sentiment of our community. To support this goal, we have introduced a more robust plan development process and taken the time to engage broadly and deliberatively to understand what matters most. This has included:

- broad-based community engagement through the Nillumbik Now and Beyond campaign (in February 2025), which involved surveys and community pop-up consultations;
- a 2-day deliberative community forum (held in May 2025) where a randomly selected, representative group of 20 residents came together to deliberate on broader community themes and Council priorities, and community contributions regarding recent council projects and consultations.

The culmination of this feedback has shaped the strategies and priority actions of this Council Plan.

Throughout our engagement with the community, we heard consistent messages. Our community wants to feel safe and supported, particularly in the face of increasing climate-related risks. Strengthening our emergency preparedness and response capabilities emerged as a clear priority, along with maintaining local roads, footpaths, and roadside vegetation, needs that are particularly pronounced in rural and bushfire-prone areas.

Improving safety on our roads for drivers, cyclists and pedestrians was also a key concern, with strong emphasis on school zones and high-traffic areas. The community also expressed a desire for improved public transport, stronger local connections, and better accessibility to support full participation in community life, particularly for older adults and residents in our townships.

Our community deeply values Nillumbik's environment, natural beauty, heritage and creative spirit. Protecting local waterways, sustaining our urban tree canopy, and conserving biodiversity were identified as essential to long-term liveability and environmental wellbeing. Celebrating what makes Nillumbik distinctive, including its rich history, local stories and vibrant arts is also important, as it fosters civic pride and strengthens our identity.

Underlying all of this is the need for strong, accountable leadership. Good governance, clear communication, sound financial management and genuine community engagement are essential to delivering on the aspirations of our residents.

We thank everyone who contributed to the development of this plan. Together, we will continue to build a thriving, resilient and inclusive Nillumbik, one that protects what we value today while preparing for the challenges and opportunities of tomorrow.

We look forward to receiving your feedback on our Draft Council Plan 2025-2029 and working with you to make our Shire an even better place to live, work and play.



About Nillumbik

History

The area now comprising the Shire of Nillumbik was inhabited for tens of thousands of years by the Wurundjeri-willam clan of the Woi-wurrung speaking people. Wurundjeri is the clan name, willam refers to a subsection of the clan associated with a specific land area recorded as the Yarra and Plenty. The Wurundjeri people called the region 'nillumbik', meaning shallow earth, a name later used by the Europeans who settled here.

European settlement of the Nillumbik area dates from the late 1830s, with land used mainly for grazing, timber cutting and viticulture. Despite this timber and agricultural activity, the area was slow to develop until the discovery of gold in the 1850s. Gold saw the establishment of townships such as Panton Hill, Research, Queenstown (now St Andrews) and Diamond Creek in the late 1850s and 1860s. From 1870 to 1900, orchards spread along the Diamond Valley, with the prosperity of the fruit-growing industry resulting in the townships of Arthurs Creek, Doreen, Plenty and Strathewen. A railway was built to Eltham and later Hurstbridge in the early 1900s supporting industry and residents.

Location

Renowned as "the Green Wedge Shire", Nillumbik is located in Melbourne's north-east and provides our residents with easy access to Melbourne, its services, job opportunities and facilities; along with access to an abundance of open space, vibrant communities and unique environmental landscapes.

Nillumbik Shire's boundaries are the Kinglake National Park in the north, the Yarra escarpment in the east, the Yarra River in the south, and the Plenty River and Yan Yean Road in the west. Nillumbik's location on the urban fringe along with its unique environmental characteristics make the area prone to bushfire. Our community's strong sense of belonging and high levels of engagement has strengthened its ability to prepare for, respond to and recover from bushfires.

Community

Nillumbik has a population of approximately 63,500 people who enjoy a healthy, safe and family-friendly lifestyle. The Shire is a collection of townships and villages, each with its own unique identity and heritage.

Nillumbik offers residents and visitors distinctive village-style shopping, access to professional services, public transport and places to meet and socialise. Rural properties, rich agricultural land, shared trail networks, orchards and award-winning wineries complement the Shire's unique and diverse landscape. These social, economic and environmental features enhance quality of life and make it a desirable place to live, work and play.

Green Wedge

Melbourne has 12 Green Wedges, widely known as the "lungs of Melbourne". The Nillumbik Green Wedge covers 91% of the total area of the Shire and is host to a number of state and national parks. Approximately 15,665 residents which represents those living in both the Rural Green Wedge (12,639) and the Urban Green Wedge (3,026). Nillumbik's Green Wedge is highly valued locally and regionally because of its biodiversity, natural beauty, recreation opportunities, visitor experiences, mixed-use trails, grazing land and agriculture, and offers residents and visitors a unique rural environment of bushland, small farms, rivers and forest.

The productivity of Nillumbik's Green Wedge is important to the Shire's economy. There is a growing number of artisan food and beverage producers across the Green Wedge, and opportunities continue to grow for farm gate initiatives, paddock to plate experiences and food and beverage trails.

Environment

The Shire contains an array of peri-urban areas, bushland, landscapes, open spaces, townships and communities. The Yarra River corridor is a special and defining element of the southern edge of the Shire and flows around the special environmental living zone of the Bend of Islands, on to North Warrandyte, Research and Eltham.

A distinguishing feature of the municipality is its vast Green Wedge with the key purposes of conservation, agriculture, active lifestyles and tourism.

Much of Nillumbik is characterised by open grassy woodland, with relatively shallow soils dominated by long leaved and red box eucalypts, and with the fertile soils of an old volcano at Kangaroo Ground offering localised rich farming land. The Arthurs Creek and Strathewen areas have seen a long history of orchards and cattle farming, yet retain many stands of ancient eucalypts. Nillumbik's suburbs and townships benefit from a generally high extent of tree canopy, with an average urban canopy coverage of 39%. This places Nillumbik's urban canopy cover as the second-highest in all of Melbourne.¹

The Shire is home to a vast array of indigenous flora and fauna species, including many that are listed significant and threatened species. Local fauna ranges from kangaroos, wombats, platypus and echidnas to a wonderful array of birds, and to rare Brush-tailed Phascogales, Eltham Copper Butterflies, Powerful Owls and Southern Toadlets.

Active lifestyles

Nillumbik has a higher level of participation in sport and recreation activities than the state and national averages. Walking for recreation is the most popular activity, followed by cycling, swimming and running. Horse riding is also a common activity as residents and visitors utilise the expansive shared trail network on offer.

Residents' participation in structured sports such as tennis, golf, football and netball are all higher than the state and national averages, and the Shire is currently experiencing unprecedented growth in women's participation in sport.

Artistic and cultural identity

Nillumbik is an arts-rich environment. Residents and visitors value the rich local artistic heritage, as well as the Shire's history and culture, both Indigenous and non-Indigenous. The creative life of the community is highly valued and artistic practices are seen as varied, flourishing and reflecting the connection to the natural environment.

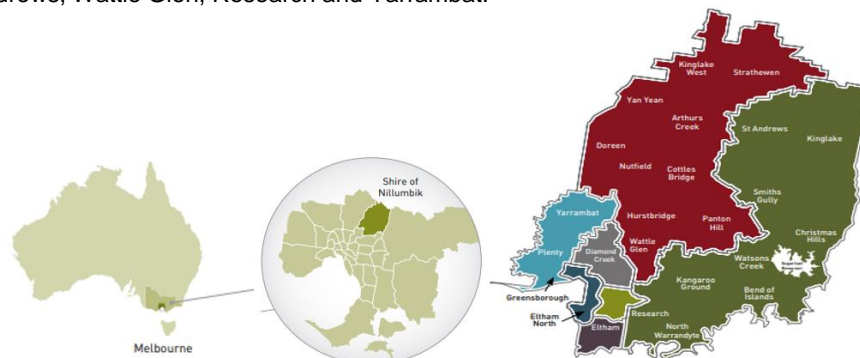
The strength of Nillumbik's artistic traditions, commencing with the early Australian Impressionist painters, the mudbrick movement and through to current practice in contemporary arts, is evident in Nillumbik's artist communities including Baldessin Press, Butterfly Studios, Dunmoochin and Montsalvat as well as the very popular Artists Open Studio weekends.

Nillumbik also has strong links to the performing arts and is proud to be home to acclaimed and emerging authors, photographers, filmmakers and musicians. Nillumbik's contribution to arts and culture is regularly showcased at local, regional and international forums.

Economy

Nillumbik has a diverse economy that generates \$2.55 billion in gross regional product with 37,330 employed residents. Our three largest industries by employment are construction, health care, social assistance and education and training.

Our 6,400 businesses create more than 16,700 local jobs. Nillumbik's key employment areas are predominantly concentrated in the major activities centres Eltham and Diamond Creek. There are also smaller neighbourhood centres such as Hurstbridge and the local centres of Greensborough, Pantom Hill, Smiths Gully, St. Andrews, Wattle Glen, Research and Yarrambat.



¹ Nillumbik Shire Council (2024) Nillumbik Urban Tree Canopy 2024-2040, p.7.



Nillumbik by numbers (to be converted to Infographics)

Land area by square kilometres: 432
Estimated residential population: 63,693
Female residents: 50.6%
Male residents: 49.4%
Forecasted population to 2036: Approximately 70,000
Aboriginal and Torres Strait Islander population: 0.6%
Overseas born: 16%
Language spoken at home other than English: 10%
Median age: 42 years
Residents aged 0-17 years: 23%
Residents aged 18-49 years: 37.7%
Residents aged 50-69 years: 28.6%
Residents aged 70-84 years: 9.3%
Residents aged 85+: 1.4%
Medium and high-density housing: 7%
Median weekly household income: \$2,482
Households with a mortgage: 47%
Households renting: 9%
University qualification: 32%
Trade qualification (certificate): 19%
Unemployment rate: 3.5%
Travel to work by car (as a driver or passenger): 50%
Public transport to work: 2.2%
Social-Economic Indexes for Areas (SEIFA) of disadvantage: 1093
1 in 5 residents (21%) sought professional help for a mental health problem in the last year
Almost 3 in 5 residents are overweight or obese
Volunteering: 16.9%
1,300 indigenous flora species
55 threatened indigenous flora species indigenous flora species
370+ indigenous fauna species
65 indigenous fauna species are threatened

Source: Australian Bureau of Statistics 2021 collated by .idcommunity Demographic Resources (**Population highlights | Nillumbik Shire | Community profile (id.com.au)**)

Additional information about Nillumbik's native plants can be found at **nillumbik.vic.gov.au/native-plants**.

Additional information about Nillumbik's native animals can be found at **nillumbik.vic.gov.au/native-animals**.

Our Community Vision – Nillumbik 2040

Under the *Local Government Act 2020*, the Council Plan must align with our community vision, which is an aspirational description, looking at least 10 years into the future, of what a community values and wants for the future.

The Nillumbik Community Vision – Nillumbik 2040 (the Vision) represents the shared aspirations of our community. Developed in partnership with the community, and subsequently adopted by Council in October 2021, the Vision guides Council's long-term planning and decision-making, ensuring we stay focused on the things that truly matter.

Our vision statement

Our people

Community is at the heart of the Shire of Nillumbik. We work to keep our community engaged, connected, active and supported in a healthy, safe and sustainable environment.

Our place

Nillumbik's places and spaces make an important contribution to health, wellbeing, culture, the environment, biodiversity and economic success. We continue to strengthen the Shire's identity through reinforcing existing natural and built form, improving accessibility and connectivity, protecting the environment, and enhancing both the Green Wedge and tree canopy in urban areas.

Our future

We acknowledge the pressures on liveability that in the future will likely challenge the way we live. We continue to strengthen Nillumbik's ability to manage and adapt to changing circumstances, to ensure the Shire and our community remain sustainable and resilient.

Our Council

With the trust and support within our community, Council goes further to deliver fundamental services and innovative programs to facilitate the best possible community outcomes.

To ensure the Vision remains relevant and aligned with community needs, Council undertook a review of the vision statement in 2025. This was informed by questions in the Nillumbik Now and Beyond community engagement survey and 2025 Annual Community Survey. The community feedback confirmed that this vision statement remains strong and meaningful, while also acknowledging evolving challenges — such as climate resilience, housing diversity, transport access and social connection.

This Council Plan sets out how we will respond to those challenges and deliver on the Vision over the next four years. It translates the long-term vision into strategies and actions over this term of Council.

The framework for the Council Plan has been designed using the following four themes aligned to our community vision, Nillumbik 2040.



Our Council Plan

The Council Plan 2025-2029 (the Plan) is Council's roadmap for the next four years, setting out the strategies and actions that will guide how we serve and support the Nillumbik community. Shaped through extensive community engagement, including online surveys, local precinct 'pop-up' sessions, internal workshops, and a deliberative community forum as part of the Nillumbik Now and Beyond campaign, this Plan reflects what our community told us matters most.

Every Victorian council is required to adopt a Council Plan within the first year of a new Council term, under *the Local Government Act 2020*. Our Plan responds directly to the community's long-term aspirations outlined in our Community Vision.

The Council Plan is structured around four key themes, each aligned with the Community Vision:

1. Inclusive living and participation
2. Liveable and connected communities
3. Sustainable futures and healthy environments
4. Responsible governance and community leadership.

These themes are supported by:

- Objectives – the outcomes we aim to achieve
- Strategies – how we will work towards our objectives
- Priority actions – what we will focus on
- Strategic indicators – how we will measure this.

Each year, we put this Plan into action through an Annual Action Plan, which sets out what we will deliver that year. Progress is reported quarterly and in our Annual Report, helping us stay transparent and accountable.

We also prepare an Annual Budget to support the delivery of the Council Plan. This outlines how we will fund our services and projects, making sure we balance community needs with financial sustainability.

Some of our performance measures are also published through the **Know Your Council** website, so our community can see how we're tracking compared to other councils.





1. Our people – Inclusive living and participation

Our shared vision

Community is at the heart of the Shire of Nillumbik. We work to keep our community engaged, connected, active and supported in a healthy, safe and sustainable environment.²

Our objective

We support and empower our diverse community by reducing barriers, strengthening connections, and creating a welcoming environment where everyone feels respected, included, and able to participate fully in community life.

How will Council achieve this?

Welcoming and inclusive communities	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
1.1 Advance equity and inclusion across the Shire by addressing barriers to participation and supporting opportunities for all people to contribute to, and benefit from community life, regardless of age, ability, identity or background.	1a) Strengthen Council's capability to embed equity and inclusion in decisions, services, and engagement through delivery of the: <ul style="list-style-type: none">• Access, Equity and Inclusion Policy• Gender Equality Action Plan• Nillumbik Health & Wellbeing Plan. 1b) Deliver targeted improvements to services, infrastructure and programs to remove barriers and enable equitable access for all community members across every life stage. 1c) Explore Council's role in supporting and advocating for the services and amenities that residents need to live well and stay in Nillumbik as they move through different life stages. 1d) Implement Council's <i>Reflect</i> Reconciliation Action Plan and continue to advance reconciliation.
1.2 Improve equitable access to inclusive services, infrastructure and opportunities across all life stages that support physical and mental wellbeing.	
1.3 Support lifelong learning through accessible community programs, libraries and neighbourhood houses to enhance social connection, build skills and support mental wellbeing across all life stages.	
1.4 In partnership with the Wurundjeri Woi-wurrung people as the Traditional Owners of Nillumbik, protect Aboriginal cultural heritage and work together towards reconciliation, through trust, education, and celebration.	
Community empowerment and participation	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
1.5 Strengthen inclusive participation in decision-making by empowering individuals and communities to influence matters that affect their lives, recognising and valuing their lived experience and local knowledge.	1e) Enable community leadership through supported networks and committees (including Council's Advisory Committees). 1f) Expand opportunities for community involvement through volunteering, including the Shire's 'Friends of' groups.
1.6 Support volunteering and community involvement to build strong connections, improve wellbeing, and create welcoming, active places for everyone.	

² From our community vision statement (page 8)

1.7 Create meaningful opportunities for participation and proudly celebrate the invaluable role volunteers and friends-of groups play in enriching community life.	1g) Support historical societies and community groups to preserve and share local knowledge, cultural heritage and shared histories. 1h) Explore initiatives such as a Parks Alive! Program to activate neighbourhood parks and reserves through locally-led events, volunteers and activities that foster community connection and wellbeing.
Health, equity and community connection	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
1.8 Address the social determinants of health by supporting initiatives that promote safe housing, education, community connection and food environments.	1i) Work in partnership with the Northern Councils Alliance (NCA) to advocate to the State Government to strengthen policy to support delivery of Affordable Housing in Nillumbik. 1j) Provide targeted financial support to local food pantries within Council Living and Learning Hubs aimed at enhancing their capacity to deliver healthy, and reliable food relief to residents in need.
1.9 In partnership with local organisations, agencies and service providers, deliver coordinated health and wellbeing outcomes.	1k) Work towards developing and securing funding for a Food Systems Strategy. 1l) Provide a range of community-based educational programs tailored to various age groups and life stages through Living & Learning Nillumbik, Neighbourhood Houses, Community Hubs, Nillumbik Youth Hub, Maternal Child Health Centres, libraries, and Edendale Community Environment Farm.
1.10 Strengthen local food systems to increase access to nutritious food and reduce food insecurity.	1m) Support Men's Sheds, Wadambuk St Andrews Community Centre and Allwood House.

How will we measure this?

Strategic indicators
<p>Number of Reconciliation Action Plan (RAP) actions delivered (Council records, Target: Increase)</p> <p>Number of Council volunteers (Council records, Target: Annual increase)</p> <p>% pre-school participation rate (Council records, Target: Maintain or increase)</p> <p>Proportion of the municipal population that are active library members (LGPRF, Target: Increase)</p> <p>Number of visits to local libraries (per population) (Council records, Target: Increase)</p> <p>Total enrolments in Living & Learning Nillumbik programs (Council records, Target: Increase)</p> <p>% of population who have worried about food insecurity (NEPHU annual, Target: Decrease)</p>

Services we deliver

Service	Description
Ageing well	We promote healthy ageing and support older people to stay active, connected and independent, including by helping them access local services and opportunities.
Community development	We build strong, connected communities by working alongside local groups, residents and services to support inclusion, participation, wellbeing and resilience.
Community facilities	We look after community centres and halls so people have welcoming spaces to gather, learn and connect.
Disability inclusion and volunteering	We deliver programs that support inclusion for people with disability, encourage volunteering, and raise awareness of access and equity in everything we do.
Early years	We provide services and support for young children and families, including early learning programs, parenting advice, and access to welcoming play and learning spaces.
Libraries	We offer welcoming library spaces and services that support lifelong learning, reading, digital access and social connection for people of all ages.
Living and Learning Nillumbik	We deliver inclusive lifelong learning through our neighbourhood houses, helping people connect socially, gain new skills and take part in community life.
Maternal and child health	We support families with young children through free health checks, immunisations and parenting advice, with a focus on healthy child development and early support.
Social planning and equity	We promote fairness, inclusion and wellbeing by leading work in public health, gender equity, inclusion and reconciliation.
Youth services	We support young people in Nillumbik through programs, events and services that promote connection, wellbeing, leadership and positive development.



2. Our place – Liveable and connected communities

Our shared vision

Nillumbik's places and spaces make an important contribution to health, wellbeing, culture, the environment, biodiversity and economic success. We continue to strengthen the Shire's identity through reinforcing existing natural and built form, improving accessibility and connectivity, protecting the environment, and enhancing both the Green Wedge and tree canopy in urban areas.³

Our objective

We create vibrant, inclusive neighbourhoods and rural townships through thoughtful planning, improved walking and transport links, diverse housing options, quality open spaces, and community infrastructure that reflect Nillumbik's unique character and the needs of our community.

How will Council achieve this?

Vibrant, safe and liveable activity centres and neighbourhoods	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
2.1 Advocate for planning outcomes that balance housing needs with the protection of local neighbourhood character and the unique identity of our communities.	2a) In response to State Government housing targets (additional 6,500 new dwellings by 2050), advocate for housing and planning reforms that protect local neighbourhood character.
2.2 Plan for community infrastructure and diverse amenities in our activity centres and townships to support growth, liveability, and a vibrant, accessible precinct.	2b) Update and finalise the Nillumbik Housing Strategy to support diverse housing options near transport hubs and within our activity centres and townships to create connected, sustainable communities that support our community to 'age in place'.
2.3 Support the concept of 'living locally' by making it easier for the community to meet most daily needs within the Shire.	2c) Complete the Diamond Creek Community Infrastructure Master Plan to inform infrastructure and service options for the community.
2.4 Enhance the transport network to improve safety, accessibility and connectivity.	2d) Undertake a parking audit and assessment in the Diamond Creek and Eltham Major Activity Centres, to identify and improve parking infrastructure to make it safer and more efficient.
2.5 Improve local road infrastructure to meet community needs while respecting neighbourhood character.	2e) Optimise car parking around the Diamond Valley Sports and Fitness Centre, particularly on occasions with large attendance at the stadium.
2.6 Encourage design in Council and community projects that respects and fits with Nillumbik's neighbourhood and rural character.	2f) Implement the Diamond Creek and Eltham Activity Centre Structure Plans to improve access and connectivity within Major Activity Centres. 2g) Prioritise pedestrian safety improvements to help inform capital works delivery by developing the following: <ul style="list-style-type: none"> • Road Safety Strategy • Safe Pedestrian Crossing Plan • Shire-wide Walking and Pedestrian Strategy.

³ From our community vision statement (page 8)

	<div>2h) Review and deliver on the footpath prioritisation program to optimise footpath network connectivity and accessibility.</div> <div>2i) Undertake a traffic and pedestrian safety audit and assessment of each of the Shire’s 27 primary and secondary schools to identify priorities and inform future capital delivery projects.</div> <div>2j) Undertake a Shire-wide Bus Network Review to identify connectivity and frequency improvements, particularly in rural areas.</div> <div>2k) Advocate for a pedestrian rail crossing and associated connections linking Coolabah Drive (Eltham) with the Diamond Creek Trail.</div> <div>2l) Prepare an issues and options paper around potential guidelines regarding nature strips and roadside planting that prioritises indigenous species.</div>
Rural character and communities	
<div>Strategy</div> <div>How will Council work towards its objective?</div>	<div>Priority actions</div> <div>What will Council focus on?</div>
2.7 Foster a strong connection to the Green Wedge by promoting its value and acknowledging its diverse activities and lifestyles.	<div>2m) Continue to implement the Green Wedge Management Plan, Biodiversity Strategy and the recommendations of the Nillumbik Planning Scheme Review.</div> <div>2n) Implement Land Management Incentive Programs to landholders to adopt sustainable and regenerative agricultural practices.</div> <div>2o) Advocate for improved public transport services, including to better connect rural communities through improved bus services by implementing the Integrated Transport Strategy, outcomes of the Bus Network Review and through shared advocacy with the Northern Councils Alliance (NCA).</div> <div>2p) Deliver an education campaign to support respectful use of shared public spaces both within the Green Wedge and in our urban environments.</div>
2.8 Protect the environmental values, heritage and rural character of the Shire through sustainable land use practices, biodiversity conservation and responsible land-use planning.	
2.9 Support the viability of rural activities and diverse lifestyles by encouraging sustainable agriculture and land stewardship that respect the landscape.	
2.10 Strengthen transport connections across the Shire by collaborating with partners and advocating for improved public transport, with a focus on enhancing rural bus services to support younger residents and reduce car dependence.	
2.11 Enhance and expand shared trail networks to support community access, recreation and enjoyment of the Shire.	
Protection of biodiversity	
<div>Strategy</div> <div>How will Council work towards its objective?</div>	<div>Priority actions</div> <div>What will Council focus on?</div>
2.12 Protect and enhance the Shire's natural environment and biodiversity to preserve the unique character, heritage and ecological health of our community.	<div>2q) Continue to implement the Biodiversity Strategy including to:</div> <div><div>• advocate for increased State and Federal government support to better manage pest plants, weeds and animals</div></div>

<p>2.13 Ensure consistent and effective enforcement of the planning scheme, including matters such as illegal dumping (including industrial waste and fill dumping), vegetation removal, and unauthorised land use or development.</p>	<ul style="list-style-type: none"> • continue to carry out long-term wildlife monitoring to assess the health of Nillumbik's wet and dry forests • foster multi-agency and community partnerships including with environmental volunteers. <p>2r) Advocate to the State Government for funding to trial virtual fencing to protect wildlife along roadsides and vehicle safety.</p> <p>2s) Strengthen enforcement of planning and building matters by fulfilling Council's obligations under the <i>Planning and Environment Act 1987</i> and <i>Building Act 1993</i>.</p>
<p>Open spaces and active places</p>	
<p>Strategy <i>How will Council work towards its objective?</i></p>	<p>Priority actions <i>What will Council focus on?</i></p>
<p>2.14 Promote active participation in sports, leisure, and recreation, with a focus on providing well-planned facilities to meet the needs of the community.</p>	<p>2t) Continue to review and innovate offerings and services at Council's contracted leisure facilities to increase participation and support health and wellbeing outcomes across the community.</p> <p>2u) Deliver capital works projects, including (but not limited to):</p> <ul style="list-style-type: none"> • Change room upgrade at Yarrambat War Memorial Park, Yarrambat
<p>2.15 Prioritise the ongoing enhancement and expansion of the Shire's shared trail network, with a focus of improving connectivity.</p>	<ul style="list-style-type: none"> • Extension to Diamond Creek Men's Shed at Challenger Street Reserve, Diamond Creek • New Community Recreation Park (BMX) at Challenger Street Reserve, Diamond Creek • Upgrade to Diamond Creek Outdoor Pool, Diamond Creek • New Hurstbridge Community Shed in Fergusons Paddock, Hurstbridge
<p>2.16 Plan, maintain, and improve open spaces, streetscapes, and public places to enhance safety, accessibility and amenity.</p>	<ul style="list-style-type: none"> • Open Space Plan implementation at Graysharps Road, Hurstbridge • Improvements to park pavilion at Eltham Lower Park, Eltham • Upgrade to the Eltham Rugby pitch, Eltham • New shared trail bridge at Alister Knox Park, Eltham. <p>2v) Seek funding opportunities for future capital works projects, balancing community need with budget constraints, including (but not limited to):</p> <ul style="list-style-type: none"> • Dedicated dog park at Diamond Hills Reserve, Greensborough • Equestrian pavilion upgrade at Yarrambat Park, Yarrambat • Tennis court upgrades at Challenger Street, Diamond Creek • Pavilion upgrade at Coventry Oval, Diamond Creek • Completion of the Graysharps Road precinct development, Hurstbridge

	<ul style="list-style-type: none"> Upgrades to sports infrastructure facilities in Panton Hill, Wattle Glen and Hurstbridge Upgrade Alan Marshall Reserve, Eltham. <p>2w) To further the Northern Recreation Trails Strategy, undertake a feasibility study to construct new section of trail connecting the Plenty River Trail (near Lear Court) to the Diamond Creek Trail at Allendale Road, east along the Maroondah Aqueduct across Diamond Creek Road.</p> <p>2x) Implement a 'rapid response' framework to better respond to cleanliness and maintenance of public amenities and spaces, helping to create welcoming and well cared-for places and spaces.</p> <p>2y) Develop a masterplan for Yarrambat Park to guide future improvements and use.</p> <p>2z) Design an amenity and concept plan for Alan Marshall Reserve (Eltham) to support recreation and community needs.</p>
Distinctive and creative communities	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
2.17 Support local art, culture and placemaking initiatives that enrich everyday community spaces and experiences.	2aa) Support placemaking initiatives, including public art projects, to enhance public spaces and community identity.
2.18 Encourage the development of creative infrastructure in Nillumbik that celebrates local stories, heritage and artistic expression.	2ab) Implement Nillumbik's Creative Infrastructure Framework to optimise the use of existing Council facilities and build partnerships with local artists and creative organisations to support diverse forms of creativity.
2.19 Strengthen Nillumbik's local economy by supporting businesses, growing local industries, attracting investment, and promoting vibrant events.	2ac) Promote Nillumbik as a tourism destination, celebrating its natural, cultural and creative assets through our Visitor Economy partnership with Yarra Ranges and Cardinia Shire councils. 2ad) Increase the use of local suppliers and services through procurement processes, in Council operations and capital works.

How will we measure this?

Strategic indicators
Percentage of Council planning decisions upheld at VCAT (LGPRF, Target: Increase)
Community satisfaction with the appearance and quality of newly constructed developments (Annual Community Survey, Target: Increase)
Percentage of annual capital works program completed (Council records, Target: Minimum 90%)
Total visitation at leisure and aquatic facilities (LGPRF, Bi-annually, Target: Increase)
Community satisfaction with on and off-road bike paths (Annual Community Survey, Target: Increase)

Community satisfaction with provision and maintenance of parks and gardens
(Annual Community Survey, Target: Increase)

Number of attendees at Council events and festivals
(Council records, Target: Increase)

Community satisfaction with arts and cultural programs, activities and events
(Annual Community Survey, Target: Increase)

Number of place-making projects implemented
(Council records, Target: Increase)

Community satisfaction with support for local businesses
(Annual Community Survey, Target: Increase)

Services we deliver

Service	Description
Arts and culture	We support arts and culture by managing local art, exhibitions and public art, and by creating opportunities for people to enjoy and take part in creative activities across the Shire.
Building maintenance	We keep Council buildings safe and in good condition through regular maintenance and safety checks.
Building safety and regulation	We make sure buildings are safe by checking plans, inspecting construction, and issuing building permits and safety certificates.
Capital works	We deliver building and infrastructure projects like roads, paths, playgrounds and community facilities by managing construction, upgrades and repairs across the Shire.
Community safety and local laws	We help keep the community safe by managing local laws, patrolling public areas, handling animal management, and regulating parking.
Design and development	We design roads, bridges, drainage and landscaping, and check the engineering side of planning applications and subdivision works.
Events and place	We plan and support local events and place-based initiatives that bring people together, celebrate culture and creativity, and activate public spaces across Nillumbik.
Open space maintenance	We care for parks, sportsgrounds, street trees, reserves and roadsides to keep them clean, safe and green.
Recreation and leisure	We look after sportsgrounds, recreation trails, playgrounds, and leisure centres so everyone can stay active and enjoy the outdoors.
School crossings	We help keep children safe by providing school crossing supervisors across the Shire.
Statutory planning	We manage the planning scheme by assessing applications, ensuring developments follow the rules, and supporting good planning outcomes for the Shire.
Tourism and business support	We support local businesses and tourism by offering guidance, networking opportunities, and promotional activities to help the local economy thrive.
Traffic and transport	We plan and manage transport and traffic projects to help people move around safely and easily.



3. Our future – Sustainable futures and healthy environments

Our shared vision

We acknowledge the pressures on liveability that in the future will likely challenge the way we live. We continue to strengthen Nillumbik's ability to manage and adapt to changing circumstances, to ensure the Shire and our community remain sustainable and resilient.⁴

Our objective

We lead with practical, local action to reduce the environmental and financial impacts of climate change, grow and protect our tree canopy, cut waste, and support a thriving natural environment for current and future generations.

How will Council achieve this?

Local climate action	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
3.1 Recognise and respond to climate change as both an environmental and financial priority for Council.	3a) Integrate climate risk into Council's financial and strategic planning.
3.2 Act locally on climate change by reducing Council's emissions and supporting our community to do the same, through a wide range of initiatives that promote clean energy, sustainable transport, efficient buildings, and climate-resilient practices.	3b) Strengthen governance and accountability for climate action through implementation of the Climate Action Plan.
3.3 Build capacity for climate-related emergencies by enhancing preparedness, information sharing and responsive infrastructure.	3c) Explore full electrification and low-emissions upgrades for Eltham Leisure Centre.
3.4 Advance sustainable procurement and waste minimisation practices that align with circular economy outcomes, low-emissions goals and green development.	3d) Progress delivery of a Nillumbik Environmental Climate Action Hub at Edendale Community Environment Farm.
3.5 Support the transition to a net zero-emission future by 2030, by enabling electric vehicle infrastructure and exploring electrification opportunities for key community facilities.	3e) Enable climate resilient and positive sustainability outcomes in the maintenance, renewal and construction of Council assets.
	3f) Facilitate third-party electric vehicle charging infrastructure at Council carparks or other carparks where appropriate.
	3g) Establish a Circular Economy Framework to guide Council and community action towards reducing waste, maximising resource recovery, and supporting local circular industries.
	3h) Advocate for the elimination of the State Government's fourth (purple) glass bin initiative due to insufficient evidence considering broader environmental impacts and lack of service cost feasibility.
Protection and enhancement of the tree canopy	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
3.6 Enhance the Shire's urban tree canopy as a means of climate adaptation, improving	3i) Protect mature trees to reduce canopy loss, revegetate suitable areas with low tree coverage

⁴ From our community vision statement (page 8)

neighbourhood character and habitat, as well as liveability.	and support biodiversity through implementation of the Urban Tree Canopy Strategy.
3.7 Foster community stewardship of the urban tree canopy.	3j) Supply annual indigenous seedling vouchers for community to support sustainable planting and improving habitat on private land.
Future planning and sustainable development	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
3.8 Strengthen environmental sustainability through integrated planning that prioritises long-term resilience, low-impact development, and climate-responsive design.	3k) Promote sustainable development through environmental impact assessments and green building practices by developing an Environmentally Sustainable Development (ESD) Policy.
3.9 Enhance climate resilience by sustainably managing water resources through upgrading drainage infrastructure and stormwater systems, increasing water capture and reuse and reducing flood risk to protect our community, natural environment and build assets.	3l) Progress the flood modelling process in partnership with Melbourne Water and embed flooding extents and mapping into the Nillumbik Planning Scheme.
3.10 Promote sustainable food systems by enhancing agriculture's role in climate resilience, using water-sensitive practices, and supporting low-emission methods for long-term sustainability.	3m) Review the Integrated Water Management Plan including a review of water-sensitive urban design principles and strategies to improve water security, reduce flood risk and build climate resilience.
	3n) Establish a plan to upgrade critical infrastructure including drainage and sewerage to support public health, sustainable development, population growth, climate change adaptation, and improved environmental outcomes.
	3o) Strengthen Council's capacity to support agriculture and food system initiatives through dedicated programs, workshops, and demonstration projects as identified in the Future of Agriculture in Nillumbik plan.

How will we measure this?

Strategic indicators
Community satisfaction with Council's performance in delivering climate action leadership and initiatives (<i>Annual Community Survey, Target: Increase</i>)
Percentage of tree canopy cover within the Shire (<i>Council records, Target: Increase %</i>)
Number of trees planted in streets and parks to maintain tree canopy (<i>Council records, Target: Increase</i>)
Volume of annual greenhouse gas emissions emitted within the Shire (<i>Ironbark snapshot, Target: Progress towards net-zero emissions by 2035</i>)
Volume of annual greenhouse gas emissions emitted by Council facilities and operations (<i>Council records, Target: Progress towards net-zero emissions by 2030</i>)
Volume of greenhouse gas emissions emitted by Council fleet vehicles (<i>Council records, Target: 100% zero emissions by 2030</i>)
Community satisfaction in meeting responsibilities in relation to the environment (<i>Annual Community Survey, Target: Increase</i>)

<p>Kerbside collection waste diverted from landfill (Council records, Target: Increase)</p>

Services we deliver

Service	Description
Edendale Community Environment Farm	We operate the farm as a hub for environmental education, offering programs, demonstrations, and a plant nursery to connect the community with sustainable practices.
Environment and conservation	We protect and enhance our natural areas by managing bushland reserves, providing conservation advice, and controlling invasive plants and animals to support local biodiversity.
Environmental health	We protect public health by regulating food safety, managing septic systems, and addressing issues like noise and pollution to ensure a safe environment for all.
Road and drainage maintenance	We maintain local roads, footpaths, trails, bus shelters, and bridges, and manage stormwater drains to keep our community safe and connected. We also handle street cleaning and the collection of deceased animals.
Strategic planning	We guide the future of our Shire by planning land use, urban design, and development, ensuring growth aligns with our community's values and vision.
Strategic waste and circular economy	We develop and implement strategies to manage waste effectively, aiming to reduce environmental impact and promote recycling and reuse within the community.
Sustainability	We promote sustainable living by supporting initiatives that reduce waste, conserve resources, and encourage environmentally friendly practices across the community.
Waste management and recycling	We oversee the collection of household waste, recycling, green waste, and hard waste, and coordinate programs to educate and reduce landfill use.



4. Our Council – Responsible governance and community leadership

Our shared vision

With the trust and support within our community, Council goes further to deliver fundamental services and innovative programs to facilitate the best possible community outcomes.⁵

Our objective

We strengthen governance and community leadership to ensure transparent, inclusive decision-making processes that engage all residents, build trust, and create sustainable solutions for Nillumbik's future.

What we will do to get us there

Good governance, communication and engagement	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
4.1 Make transparent, well-informed decisions that prioritise the community's best interests through practising good governance.	4a) Improve how we collect, manage and share data across the organisation to support evidence-based decision-making. 4b) Through an updated Communications Strategy: <ul style="list-style-type: none">• Build community understanding of Council roles, services and decision-making• Create meaningful engagement opportunities that build trust, reflect community priorities, and support active participation in Council decisions• Provide updates that show how community engagement has been considered in decision-making, to ensure engagement processes remain transparent and meaningful. 4c) Review and update financial plans to ensure they support strategic priorities, balances budgets, and accommodates future infrastructure needs.
4.2 Ensure transparent communication of Council's role and decisions, reflecting community values and priorities, to build trust and alignment with Council's purpose.	
4.3 Build strong community relationships through clear, consistent communication and meaningful engagement.	
4.4 Strengthen financial sustainability to support long-term service delivery and community infrastructure.	
4.5 Use data and evidence to drive innovative decision-making and identify future opportunities.	
Strengthening advocacy	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
4.6 Proactively advocate to all levels of government and key stakeholders to secure investment and support for community-prioritised projects.	4d) Review Council's approach to advocacy to positively influence Nillumbik's funding opportunities and legislative reform. 4e) Review advocacy priorities annually and report on key activities to the community. 4f) Continue to advocate to secure funding and support for priority projects, including: <ul style="list-style-type: none">• Coolabah Rail Reserve Crossing (Eltham)• Civic Drive/Diamond Creek Road Roundabout (Greensborough)• Improved public transport in rural areas• Northern Trails Stateave priorities
4.7 Identify and pursue innovative funding sources to enhance Council services and delivery of key infrastructure projects.	

⁵ From our community vision statement (page 8)

	<ul style="list-style-type: none"> • Key community infrastructure projects. <p>4g) Advocate for the Yan Yean Road Upgrade Stage 2 to minimise negative impacts to the local community and consider the objectives of Council's 2020 submission to the State Government.</p> <p>4h) Enable community-led action by developing tools and resources that support local advocacy, build capacity, and empower residents to address local needs independently.</p>
Responsive and efficient services	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
4.8 Continuously improve service delivery with a strong focus on customer experience and operational excellence.	4i) Strengthen Council's commitment to continuous improvement by using customer feedback and complaints to drive service enhancements, innovation, and an enhanced customer experience.
4.9 Ensure equity, accessibility and inclusion are embedded across all Council services and communications.	4j) Build capacity to explore emerging technologies that can improve services and reduce costs.
4.10 Maintain a supportive and inclusive workplace that attracts and retains high-performing staff and strengthens accountability across the organisation.	4k) Drive innovation, continuous improvement and efficiency in Council service delivery. 4l) Maintain Nillumbik's reputation as an employer of choice through leadership, culture, and staff delivering purposeful and meaningful work.
Risk management and emergency preparedness	
Strategy <i>How will Council work towards its objective?</i>	Priority actions <i>What will Council focus on?</i>
4.11 Enhance community safety, public health, amenity and the environment by promoting robust, fair and transparent approaches to maintaining compliance and enforcement.	4m) Strengthening Council's cyber security posture through tools and awareness and governance aligned with frameworks such as the Essential 8 Maturity Model.
4.12 Strengthen organisational resilience through proactive identification, assessment and management of strategic risk.	4n) Strengthen partnerships to deliver community emergency planning and preparedness workshops, enhancing local resilience and safety.
4.13 Support community resilience and safety by fulfilling emergency management responsibilities in collaboration with our partners.	4o) Provide accessible information about local laws and compliance processes, promoting voluntary compliance through education.
4.14 Ensure community wellbeing and safety during emergencies through inclusive relief and recovery support.	4p) Maintain and regularly review the strategic risk register to ensure emerging risks are identified, assessed and managed.
4.15 Prepare for the risks and impacts of a changing climate on our community, environment, infrastructure and services, and support our community to do the same.	4q) Implement fire and flood mitigation measures in line with Council's endorsed plans and risk frameworks (with other agencies), including ongoing review and monitoring of high-risk programs such as the roadside vegetation management (slashing) program.

How will we measure this?

Strategic indicators
Community satisfaction with Council making decisions in the best interests of the community (Annual Community Survey, Target: Increase)
Community satisfaction with Council's consultation and engagement (Annual Community Survey, Target: Increase)
Number of engagements and advocacy priorities (information) shared with local Members of Parliament and other influential stakeholders (Council records, Target: Increase)
Rates as a proportion of revenue (LGPRF, Target: Decrease)
Asset renewal and upgrade compared to depreciation (LGPRF, Target: Increase)
Percentage of successful grant applications applied for by Council (Council records, Target: % increase)
Community satisfaction with Council services (Annual Community Survey, Target: Increase)
Community satisfaction with customer service (Annual Community Survey, Target: Increase)
Community satisfaction in meeting responsibilities in relation to bushfire and emergency management (Annual Community Survey, Target: Increase)

Services we deliver

Service	Description
Advocacy, communications and engagement	We advocate for funding and support to deliver major projects the community values, and we engage with the community to ensure Council decisions reflect their needs and priorities.
Asset management	We plan for the long-term care of Council's roads, footpaths, and infrastructure. We schedule maintenance and renewal works and develop strategies to guide how we manage community assets now and into the future.
Corporate information and integrity	We manage Council's information and records to make sure they are handled properly and meet legal standards. We also look after incoming and outgoing mail, freedom of information requests, integrity policies, and infringement reviews.
Customer experience	We provide frontline support to residents, ratepayers, and visitors, helping them access information and services, and leading initiatives to improve the customer experience.
Emergency management	We work with partners and the community to prepare for and respond to emergencies, ensuring safety and resilience in times of crisis.
Finance and procurement	We manage Council's financial systems to make sure payments are accurate and on time. We look after budgeting, financial reporting, payroll, purchasing, rates collection, and property valuations to support responsible and sustainable financial management.
Governance	We manage Council's governance responsibilities, including organising Council meetings, supporting elections, ensuring we meet legal requirements, and providing resources and support to the Mayor and Councillors.
Human resources	We manage recruitment, staff development, and workplace relations to ensure Council has a capable, supported, and well-trained workforce.

Information technology	We provide reliable and secure technology, online services, and telecommunications to support Council operations. We manage systems, networks, and applications throughout their life to make sure they stay up to date and meet our needs.
Organisational performance	We provide performance reporting, occupational health and safety, risk management and insurance, and lead business transformation initiatives to ensure Council is aligned, efficient, and continuously improving.
Property	We manage Council-owned property, including buying, selling, leasing, and licensing land and buildings to support community and operational needs.



Implementation and reporting

We are committed to keeping the community informed about how we are delivering on the Council Plan 2025-2029.

The Council Plan also connects with other Council strategies and plans, ensuring our work is aligned across the organisation. These documents are guided by our Strategic Planning Framework, which supports a consistent and coordinated approach to planning and reporting.

In line with the *Local Government Act 2020*, this approach helps us link our long-term Community Vision, Council Plan, and other key documents. It ensures all our work is heading in the same direction, with a clear focus on what matters to the community.

Strategic planning framework

Authorisation	Legislation and regulation	
Aspiration	Community Vision – Nillumbik 2040	
Position	Access, Equity and Inclusion Policy	Community Engagement Policy
	Complaints Handling Policy	Information Privacy Policy
Strategic Planning	Annual Budget	Asset Plan
	Council Plan	Financial Plan
	Municipal Planning Strategy	Revenue and Rating Plan
	Nillumbik Health and Wellbeing Plan (incorporating the Disability Action Plan and Ageing Well Plan)	
Strategies and plans	Inclusive living and participation	Sustainable futures and healthy environments
	Early Years Infrastructure Plan Gender Equality Action Plan Reflect Reconciliation Action Plan	Climate Action Plan Integrated Water Management Plan Onsite Wastewater Management Plan Roadside Management Plan Urban Tree Canopy Strategy
	Liveable and connected communities	Responsible governance and community leadership
	Biodiversity Strategy Diamond Creek Major Activity Centre Structure Plan Economic Development Strategy Eltham Major Activity Centre Structure Plan Equine in Nillumbik Green Wedge Management Plan Housing Strategy Integrated Transport Strategy Neighbourhood Character Strategy Open Space Strategy Recreation and Leisure Strategy Road Management Plan	Advocacy Plan Communication Strategy Domestic Animal Management Plan Municipal Emergency Management Plan* Municipal Fire Management Plan* Municipal Relief and Recovery Plan* Municipal Storm and Flood Emergency Management Plan*
Action and implementation	Action and implementation plans	
	Department business plans	
	Nillumbik Planning Scheme	

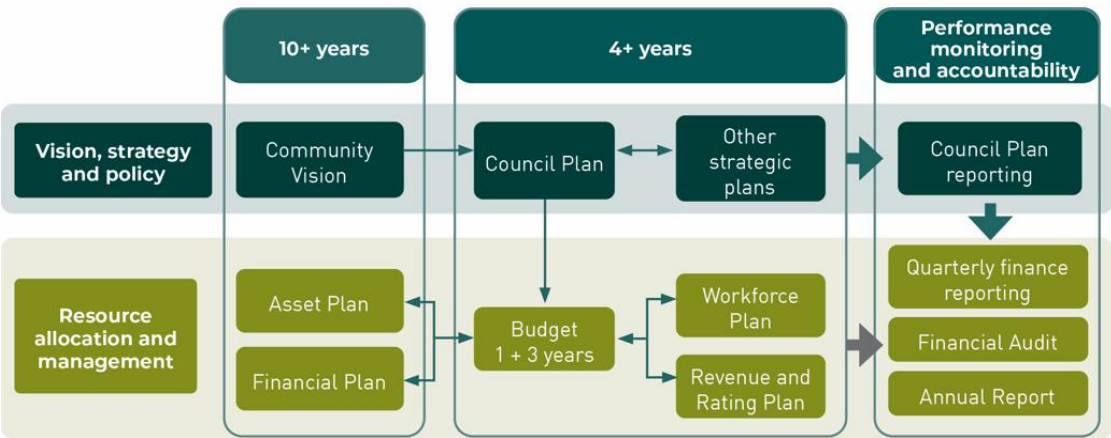
* Denotes a multi-agency plan

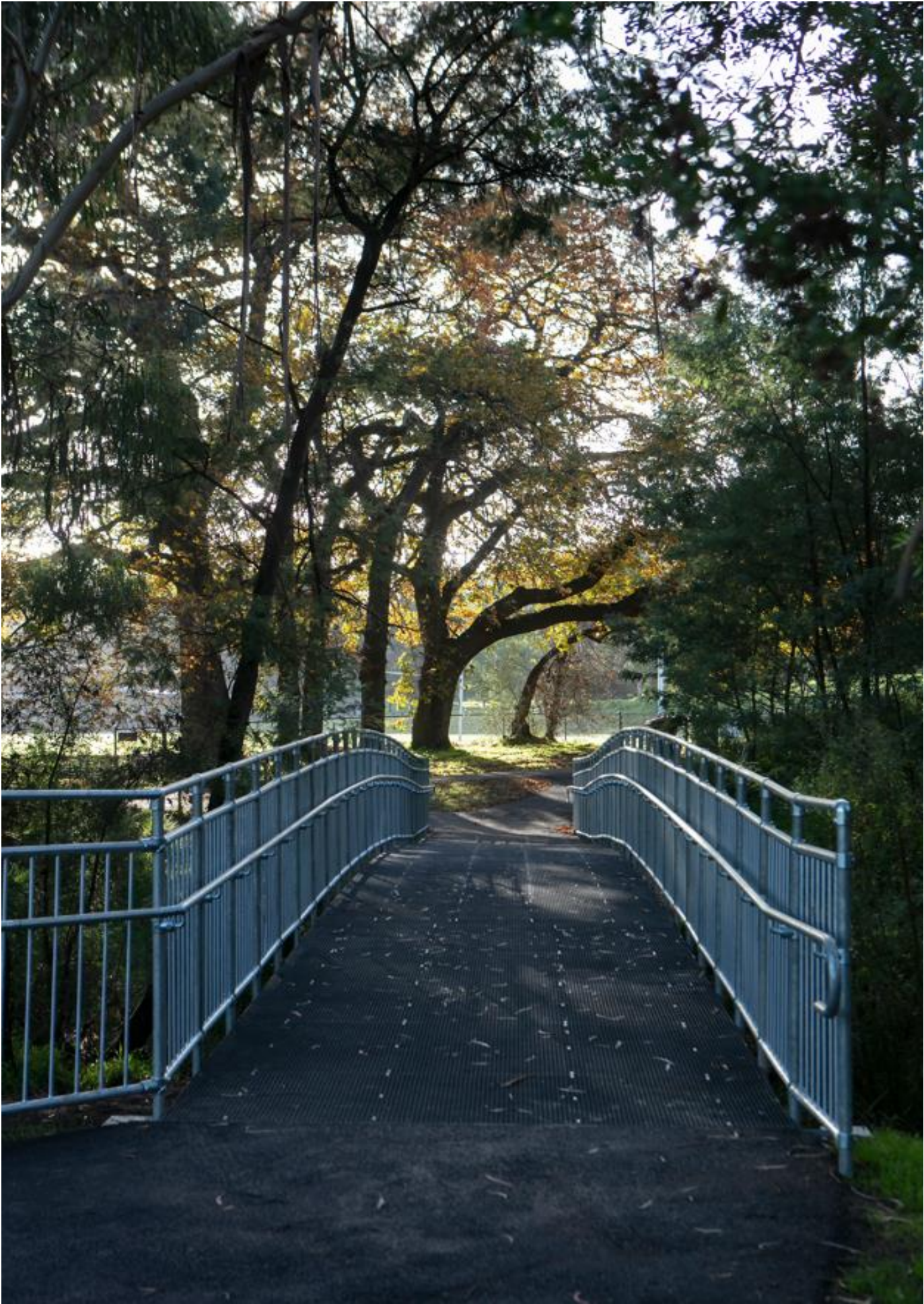
- The benefits of this integrated approach include:
- a clear and coordinated direction for Council’s work
 - better use of resources and reduced duplication
 - more transparent and accountable reporting
 - easy-to-understand plans and actions with clear outcomes and performance measures.

Each year, we create an Annual Action Plan that outlines the specific actions we will take to achieve the objectives in the Council Plan. Progress on these actions is reported every quarter at our public Council Meeting and a full update is provided each year in our Annual Report.

By tracking and sharing our progress, we make sure the community can see the results of Council’s work and how we are delivering on the things that matter most to Nillumbik.

Council’s planning and reporting framework







Nillumbik Shire Council

Civic Drive (PO Box 476) Greensborough Victoria 3088
9433 3111 | nillumbik@nillumbik.vic.gov.au

  
nillumbik.vic.gov.au

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Unique ID	Submission	Officer response
1478	<p>Q3. In your view, do the strategies (1.1 - 1.10) address the things that matter most to you in relation to inclusive living and participation? No</p> <p>This should also talk about the First Peoples of the land our Wurundjeri Woi wurrung community. The short statement needs to include First Peoples here</p> <p>Q5. In your view, do the priority actions (1a - 1m) address the things that matter most to you in relation to inclusive living and participation? No</p> <p>This should be talking about inclusion and all peoples. The images in the plan does not reflect a multi-generational or multi-cultural community. Also many people are in reflective corporate gear - the document it doesn't look safe, inviting and warm.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We acknowledge your comments regarding the importance of recognising the Wurundjeri Woi-wurrung community within the strategies and statements, and the need to ensure these elements meaningfully reflect inclusion and respect for all people.</p> <p>Including an Acknowledgement of Country and the Aboriginal and Torres Strait Islander flag at the beginning of the Council Plan is an important expression of respect, inclusion, and recognition. It affirms Council's ongoing commitment to reconciliation and acknowledges the enduring connection of Traditional Owners to land, culture, and community. Further, the development and implementation of Council's Reflect Reconciliation Action Plan will support greater visibility, inclusion and meaningful engagement with Aboriginal and Torres Strait Islander peoples across the Shire.</p> <p>We also note your observations regarding the images used in the document and the importance of representing diversity within the Nillumbik community.</p> <p>These insights will be carefully considered in the ongoing refinement of the plan.</p>
1523	<p>Q3. In your view, do the strategies (1.1 - 1.10) address the things that matter most to you in relation to inclusive living and participation? No</p> <p>The plan is so lacking in details or specifics it is effectively useless as a planning or strategic documents. I had devised and implemented Strategic Plans across state government and this one seems lacking. It is full of aspirational statements, with no insight into engagement strategy KPI 's or a RACI model for implementation and consultation. There are no accountability or effectiveness indicators and there isn't even a definition of inclusiveness. As a disabled resident and rate-payer I am not confident that this plan comes anywhere close to what is needed. Objectives and details are NOT enunciated in any way. I have seen State government agencies use the same sort of aspirational statements, and then claim after a time that they have been successful. Considering the current anti DEI sentiments in some sectors, I am not even sure that your definition of 'inclusiveness' includes people with disabilities like myself. I know numerous people do not consider disability, favouring gender, race and religion as being part of the concept. There is not even a definition or glossary in the Plan. If this draft is the result of your consultations thus far, I think there is still a long way to go and I am far from filled with confidence. This Plan does not even set out Council's Values, to give any sort of guidance or confidence to me. Interestingly, the word 'disability' only appears in this plan ONCE! Yes, there is mention of 20% of the community have a mental health issue at some time in their lives, but it completely ignores the data that states that about 25% live with a disability of some sort. In this vein what definition of disability is being used in the document? The Disability Discrimination Act, the Equal Opportunity Act, Disability Act, the Social model of disability, the Human Rights Model? I do not have confidence in what you have produced thus far. I am happy to participate in further discussions about these issues I have raised.</p> <p>Q7. In your view, do other aspects of the plan address the things that matter most to you in relation to inclusive living and participation? No</p> <p>As stated above, the plan is too vague. It does not even list some of the barriers to participation that people of various groups may face. It seems that the document assumes we all know what these are.</p>	<p>Thank you for your feedback. We appreciate you taking the time to review the document and share your thoughtful insights.</p> <p>We note your comments about the importance of clearly recognising and addressing the barriers faced by people with disabilities. We also acknowledge your concerns regarding the language used, the way disability is represented in the plan, and the need for stronger references to relevant legislation.</p> <p>Council's Inclusion Statement, at the beginning of the draft document, outlines Council's commitment and statement of intent regarding inclusivity. Further, many of these issues are more explicitly addressed in Council's Municipal Public Health and Wellbeing Plan and Nillumbik's Access, Equity and Inclusion Policy, which together provide more detailed direction on actions and commitments relating to accessibility, inclusion, and community health outcomes for people with disability.</p> <p>These insights will be carefully considered in the ongoing refinement of the plan.</p>
1528	<p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? No</p> <p>I would like to include 'cultural heritage' or 'heritage' in this section somehow. Heritage is different to 'culture' - it is the legacy from the past, such as traditions and artefacts, while culture is the current way of life and shared practices of a community. Heritage embodies the tangible and intangible legacies of the past, encompassing artefacts, customs, and values inherited from ancestors and would also include Nillumbik's indigenous heritage which is not mentioned anywhere in this section.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We note your comments about the importance of including 'heritage' as distinct from 'culture' and recognising the history, traditions and stories that shape our community, including Nillumbik's indigenous heritage.</p> <p>We also acknowledge your views on the value of arts, culture and heritage in supporting community health and wellbeing, and your suggestion to strengthen our commitment to arts programs and events.</p>

Unique ID	Submission	Officer response
	<p>I would like to see a stronger commitment to arts and culture and an acknowledgement of the benefits arts, culture and heritage contributes to community health and wellbeing.</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? No</p> <p>See above.</p> <p>I would like to see a commitment to continue to deliver quality and valued arts programs (both local and national) and arts events in Nillumbik.</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? No</p> <p>I think the representation and commitment to arts, culture and heritage is very weak.</p>	<p>Council's commitment to arts and culture is reflected in the Creative Infrastructure Framework, which provides a strategic approach to planning, developing and managing arts and cultural spaces to support creative practice and community participation.</p> <p>Council's Arts and Cultural Development team continues to deliver a range of valued local and regional programs that celebrate creativity, supports our artists and strengthens community connection.</p> <p>Your feedback on these important issues will be carefully considered as part of the ongoing review and refinement process.</p>
1533	<p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? No</p> <p>There has not been enough consideration around the congestion in the Eltham roads, especially Silver St (which is being used as a rat run) and has seen multiple accidents both vehicles, bicycles and pedestrians, the volume is too much for a narrow street and should not have CLC coaches coming up that street. The new development behind Bunnings, will further increase the already congested roads on Bridge St and the lead down to Susan St. The congestion and narrowness of all these roads cannot handle the flow of traffic. This problem also exists at the intersection near McDonalds. Better road traffic management and flow needs to be adopted if we are too accommodate more people. Main Road cannot handle the traffic flow of more vehicles unless it is widened. We need the flow of traffic in an out of Eltham to be pushed to outer roads not the inner suburbs streets.</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? No</p> <p>The congestion of the inner roads as previously mentioned makes the living standards difficult. The noise levels are increasing year on year, with cars and larger vehicles moving through these narrow suburban streets from 5:30am to 10pm at night. It is almost impossible to get out of your driveway during peak hours. It disrupts sleep and can be very dangerous. Road rage from drivers has increased as well due to their frustrations. As such to leave for work takes another 30 minutes just to get out of Eltham during peak periods.</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? No</p> <p>Refer previous comments. The paper does not cover safety in terms of enough police to support the community. We have an ever increasing teenage gang problem, that have damaged house, commercial buildings and make going to the village uncomfortable for the community in the after school period. We need to create some problems which can support these teenagers and keep them off the streets.</p> <p>Q15. In your view, do the strategies (3.1 - 3.10) address the things that matter most to you in relation to sustainable futures and healthy environments? No</p> <p>My answered is 'partly'. Not a straight 'no'. The paper does cover some level of protection of our water ways and tree canopy and public transport, but other</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We note your comments about the significant impacts of traffic congestion and road safety concerns in Eltham, including issues with narrow streets, increased traffic volumes, noise, and safety risks for residents, pedestrians, and cyclists. We also acknowledge your suggestions for improved traffic management, better infrastructure to support future growth, and strategies to reduce traffic flow through local residential areas.</p> <p>The issues raised regarding traffic congestion and road safety are addressed in more detail in Council's Integrated Transport Strategy, which outlines actions to improve traffic flow, manage congestion, and enhance safety in local areas such as Eltham. Council also continues to advocate to state and federal governments for funding and support to deliver major transport projects that address broader infrastructure challenges.</p> <p>We also note your concerns about community safety and youth-related issues. Youth engagement is a key responsibility of Council, while matters relating to youth offending and community safety fall under the remit of Victoria Police. Through Council's Youth Strategy and Youth Priorities, we focus on providing safe spaces, programs, and support for young people to promote wellbeing, strengthen community connections, and help prevent disruptive or harmful behaviours. Much of this work is done alongside Victoria Police as well as other youth focused support agencies.</p> <p>Your feedback on these important issues will be carefully considered as part of the ongoing review and refinement process.</p>

Unique ID	Submission	Officer response
	<p>matters as I have mentioned have not been considered at all or in satisfactory detail. To accommodate more people and cars, these issues must be addressed.</p> <p>Q17. In your view, do the priority actions (3a - 3o) address the things that matter most to you in relation to sustainable futures and healthy environments? No</p> <p>Refer previous comments.</p> <p>Q19. In your view, do other aspects of the plan address the things that matter most to you in relation to sustainable futures and healthy environments? No</p> <p>Refer previous comments.</p>	
1535	<p>Refer to written submission 1.</p> <p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? There is no mention of road safety with respect to wildlife. This is a big issue for the community and the only mention is to a potential virtual fence - that is not a robust strategy to protect the community. The strategic indicator from the last term "number of dead animals collected needs to be reinstated in the plan. It is the only metric we have for human/animal trauma on our roads.</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? No</p> <p>I was party to two community groups that drew up detailed inputs and e-mailed them into Council to support both the pan and budget development. None of those inputs have been recognised. We were told that was a valid form of input.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We acknowledge your comments regarding the importance of addressing road safety for wildlife. We understand the need to consider how initiatives such as virtual fencing, arboreal bridges, and other measures can support the protection of wildlife across the Shire.</p> <p>We are pleased to hear that the strategies (2.1 – 2.19) resonate with you and reflect the things that matter most to you in relation to creating liveable and connected communities.</p> <p>We note your observations regarding the importance of road safety with respect to wildlife and the value of capturing wildlife impacts across the Shire, including your suggestion to reinstate the strategic indicator “number of dead animals collected by Council.”</p> <p>The metric referenced is from the 2021–2025 Council Plan and was originally aligned to an action focused on “investigating measures to protect wildlife across a range of settings, including roadsides”.</p> <p>As Council is not the only agency that collects deceased animals, this metric is limited in that it only captures animals collected by Council and does not reflect the full extent of incidents, particularly on main arterial roads where traffic volumes are higher. For this reason, the metric was not considered essential for inclusion in the Draft 2025–2029 Council Plan and was not included in any of the earlier draft iterations. However, Council will reinstate this measure while we also consider alternative metrics that more accurately reflect wildlife impacts across the Shire as we continue to refine the plan.</p> <p>Council's ongoing commitment to protecting and enhancing biodiversity is further supported through the Nillumbik Biodiversity Strategy 2024-2034. This strategy outlines a range of actions focused on habitat protection, reducing threats to native wildlife, and improving ecological connectivity, which together contribute to the broader goal of safeguarding wildlife across the Shire. Based on your feedback, an additional priority action will be added to the plan that addresses driver behaviour and its impact on wildlife trauma.</p> <p>Council will continue to work with the State Government and relevant agencies to explore practical ways to reduce wildlife-vehicle collisions. This includes investigating options like improved signage, road markings, speed reduction measures, and driver education campaigns to help protect native wildlife.</p> <p>We also acknowledge your detailed budget suggestions, ideas for community education, and your support for recognising the work of wildlife rescuers and carers. Your examples of proactive initiatives in other municipalities provide valuable context for consideration for future approaches in Nillumbik.</p> <p>Your feedback on these important issues will be carefully considered as part of the ongoing review and refinement process.</p> <p>We appreciate your willingness to continue working collaboratively with Council to improve outcomes for wildlife and the broader community.</p>
DOC/25/62472	Refer to written submission 2.	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We acknowledge your comments regarding the importance of addressing road safety for wildlife. We understand the need to consider how strategies and actions can incorporate data to support the protection of wildlife.</p>

Unique ID	Submission	Officer response
		<p>We note your observations regarding importance of capturing wildlife impacts across the Shire. The metric referenced is from the 2021–2025 Council Plan and was originally aligned to an action focused on “investigating measures to protect wildlife across a range of settings, including roadsides.”</p> <p>As Council is not the only agency that collects deceased animals, this metric is limited in that it only captures animals collected by Council and does not reflect the full extent of incidents, particularly on main arterial roads where traffic volumes are higher. For this reason, the metric was not considered essential for inclusion in the Draft 2025–2029 Council Plan and was not included in any of the earlier draft iterations. However, Council will reinstate this measure while we also consider alternative metrics that more accurately reflect wildlife impacts across the Shire as we continue to refine the plan.</p>
1536	<p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>I strongly support actions 2k and 4f.</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? No</p> <p>Priority Actions 2b, 2c, 2f, 2g, 2h, 2i and 2k could all be better supported with an additional Strategic Indicator. I propose inclusion of a measure of the form: Residential properties within a 20-minute walk of key community destinations (eg. schools, activity centres, libraries, sporting clubs). Target: Increase.</p> <p>This measure would allow Council to evaluate how effectively strategic infrastructure investments and planning decisions improve residents' access to essential services and community hubs.</p> <p>If count of residential properties presents a technical challenge to measure, residential area could be substituted. Isochrone mapping tools provide a data source.</p> <p>Priority Actions 2j and 2o could also be supported by a similar additional Strategic Indicators, for example: Residential properties within 15-minutes access to a train station by bus and walking. Target: Increase.</p> <p>Together, these indicators provide a meaningful framework for evaluating the reach and equity of Council's efforts to improve liveability and mobility for all residents.</p> <p>I would welcome further discussion on how best to support their implementation.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We note your strong support for the strategies and priority actions in relation to liveable and connected communities, particularly actions to advocate for a pedestrian rail crossing (and connections) linking Coolabah Reserve (Eltham) with the Diamond Creek Trail (2k) and other priority projects (4f).</p> <p>We also acknowledge your suggestion to include additional strategic indicators focused on walkability and access to community destinations and transport. Your detailed proposal for measures such as residential properties within a 20-minute walk of key community destinations, and within 15 minutes of train stations by bus and walking, is noted.</p> <p>References to such indicators are also reflected in the Integrated Transport Strategy 2024–2029, which promotes safe, accessible, and connected active and public transport networks. Identifying additional indicators in line with your feedback will be considered in the refinement of the document.</p> <p>Your proposed measures also align with the work underway to finalise the Nillumbik Housing Strategy, which focuses on providing diverse and accessible housing options close to services, activity centres, and transport, enabling residents to stay connected throughout different life stages.</p> <p>Furthermore, these ideas are reinforced by the Municipal Public Health & Wellbeing Plan, which prioritises equitable access to services, active transport infrastructure, and local opportunities that promote community.</p> <p>Your insights will be carefully considered as part of the ongoing review and refinement process to ensure the plan supports liveability, accessibility, and equitable access for all residents.</p> <p>We also appreciate your willingness to discuss these ideas further.</p>
1537	<p>Q3. In your view, do the strategies (1.1 - 1.10) address the things that matter most to you in relation to inclusive living and participation? Yes</p> <p>I particularly support the strategy at 1.3 re. lifelong learning; the number of venues may need to increase to satisfy an increasing demand for connection opportunities.</p> <p>Q5. In your view, do the priority actions (1a - 1m) address the things that matter most to you in relation to inclusive living and participation? Yes</p> <p>There's currently a gap / problem with Action 1f aiming to expand opportunities for community involvement through volunteering, including the Shire's 'Friends of' groups. I find that there's insufficient Council promotion of Friends Groups especially where each individual group seeks new members. Each group struggles with this - which leads to various ideas like random local signage (possibly generated using AI), letterboxing leaflets etc. - all of which costs willing locals time and money which could be better spent on 'real' local improvements.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciated you taking the time to review the document.</p> <p>We acknowledge your strong support for the strategies and actions across all themes. We note your particular support for lifelong learning and your suggestion regarding the potential need for additional venues to meet growing community demand for connection opportunities. This will be considered through ongoing service and infrastructure planning.</p> <p>Your comments regarding the promotion of Friends Groups are also noted. Council recognises the importance of improving support and visibility for these groups and acknowledge your suggestion that Council's proposal to explore initiatives to activate neighbourhood parks and reserves through locally-led events may help address this gap.</p> <p>We also note your support for strategies to retain neighbourhood character in Eltham, enable local downsizing opportunities. These comments align with the work underway to finalise the Nillumbik Housing Strategy, which focuses on providing diverse housing options close to services, and transport, enabling residents to stay connected throughout different life stages. Further, Council has prioritised an action to advocate to state government to support the delivery of affordable housing in Nillumbik.</p> <p>Your feedback on waste management, particularly your views regarding the fourth bin, and your support for tree canopy protection are acknowledged. Nillumbik's Urban Tree Canopy Strategy 2024–2040 sets out Council's plan to protect existing trees, plant more in low-canopy areas, and encourage tree planting on private land. The goal is to stop canopy decline and</p>

Unique ID	Submission	Officer response
	<p>The initiative at Action 1h may help and should be activated asap.</p> <p>Q7. In your view, do other aspects of the plan address the things that matter most to you in relation to inclusive living and participation? Yes</p> <p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>In Eltham, many ECAG supporters - myself included - would highly support all strategies and actions that lead to the retention of neighbourhood character, growth and liveability. A huge demand also exists for those wishing to downsize IN THE LOCALITY rather than moving away. Affordability issues could be countered by planning for nominated sites (small and not-so-small) that developers could be attracted to, thereby producing a win-win scenario that currently does not exist. Perhaps an audit of Council sites in the ACZ (and nearby) that could accommodate such a plan should be undertaken asap. Tree canopy decline must be reversed too. Additionally, support must be given to the arts community by the provision of a significant centre for gallery displays and which could also encourage tourism and business growth.</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>See my comments above. Also I'm in full agreement with Action 2aa.</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>Q15. In your view, do the strategies (3.1 - 3.10) address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>I strongly support Strategy and Actions at 3.6 and 3.7.</p> <p>Q17. In your view, do the priority actions (3a - 3o) address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>Re. Action 3h, I agree that there seems to be little support for a 4th bin! Any cost benefit analysis anywhere?!</p> <p>Q19. In your view, do other aspects of the plan address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>Q21. In your view, do the strategies (4.1 - 4.15) address the things that matter most to you in relation to responsible governance and community leadership? Yes</p> <p>Q23. In your view, do the priority actions (4a - 4q) address the things that matter most to you in relation to responsible governance and community leadership? Yes</p> <p>Q25. In your view, do other aspects of the plan address the things that matter most to you in relation to responsible governance and community leadership? Yes</p>	<p>gradually increase coverage to support biodiversity, reduce heat, and maintain township character. The Strategy also promotes community stewardship to help care for trees into the future.</p> <p>Council's commitment to arts and culture is reflected in the Creative Infrastructure Framework, which provides a strategic approach to planning, developing and managing arts and cultural spaces to support creative practice and community participation. Further, Council's Arts and Cultural Development team continues to deliver a range of valued local and regional programs that celebrate creativity, support artists, and strengthen community connections.</p> <p>Your feedback and suggestions will be carefully considered as part of the ongoing review and refinement process.</p>

Unique ID	Submission	Officer response
1539 and 1540	<p>Q3. In your view, do the strategies (1.1 - 1.10) address the things that matter most to you in relation to inclusive living and participation? No</p> <p>Q5. In your view, do the priority actions (1a - 1m) address the things that matter most to you in relation to inclusive living and participation? No</p> <p>Q7. In your view, do other aspects of the plan address the things that matter most to you in relation to inclusive living and participation? No</p> <p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? No</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? No</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? No</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p>
1543	<p>Q15. In your view, do the strategies (3.1 - 3.10) address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>Q17. In your view, do the priority actions (3a - 3o) address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>Q19. In your view, do other aspects of the plan address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>It would be interesting to know where exactly the revegetation areas for low tree canopy will be. It's all a bit vague.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>Further detail on priority areas for canopy enhancement is outlined in the Nillumbik Urban Tree Canopy Strategy 2024-2040, which identifies focus areas based on canopy cover data and local needs. This strategy will continue to guide the selection of sites as implementation progresses.</p>
1545	<p>Refer to written submission 3.</p> <p>Q3. In your view, do the strategies (1.1 - 1.10) address the things that matter most to you in relation to inclusive living and participation? Yes Please see attached document</p> <p>Q5. In your view, do the priority actions (1a - 1m) address the things that matter most to you in relation to inclusive living and participation? Yes Please see attached document</p> <p>Q7. In your view, do other aspects of the plan address the things that matter most to you in relation to inclusive living and participation? Yes Please see attached document</p> <p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? Yes Please see attached document</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? Yes Please see attached document</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? Yes Please see attached document</p>	<p>Thank you for your detailed submission on the Draft Council Plan 2025–2029. We appreciate the time taken to review the document and provide comprehensive feedback.</p> <p>We welcome your strong support for the overall direction of the Council Plan and its strategies across all four themes. The Plan is scheduled to take effect from 1 July 2025.</p> <p>Your comments regarding the State Government's housing targets align with Council's ongoing work to finalise the Nillumbik Housing Strategy. This Strategy seeks to provide diverse housing options near services and transport while protecting local character and enabling residents to remain connected through all stages of life. Council has also prioritised advocacy to the State Government to support the delivery of affordable housing that reflects the unique needs of the Nillumbik community.</p> <p>We acknowledge your call for a stronger commitment to inclusive participation in decision-making. Council values community input, including written and verbal submissions, and recognises the need to ensure this input is meaningfully considered. As part of our continuous improvement, we are currently reviewing both the Communications Strategy and Community Engagement Policy to better support inclusive, transparent, and accessible engagement practices. This includes exploring how feedback provided through Participate Nillumbik and other channels can be more visibly reflected in Council's planning and decision-making.</p> <p>Your suggestions to expand and refine strategic indicators across themes particularly those relating to health, wellbeing, biodiversity and the environment are noted. While the Council Plan includes a focused, high-level set of indicators (including those drawn from the Local Government Performance Reporting Framework), more detailed measures are captured in supporting strategies such as the Biodiversity Strategy 2024–2034, Urban Tree Canopy Strategy 2024–2040, and the Nillumbik Health and Wellbeing Plan 2025–2029. These plans include metrics such as canopy coverage, biodiversity condition, and community health participation data, and your suggestions will help inform ongoing work to align and strengthen Council's planning and reporting frameworks.</p> <p>In relation to Action 2I, we note your concerns regarding nature strip management and enforcement. The proposed issues and options paper is intended to explore these very challenges, including current limitations in resourcing and compliance. This work</p>

Unique ID	Submission	Officer response
	<p>Q15. In your view, do the strategies (3.1 - 3.10) address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>Please see attached document</p> <p>Q17. In your view, do the priority actions (3a - 3o) address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>Please see attached document</p> <p>Q19. In your view, do other aspects of the plan address the things that matter most to you in relation to sustainable futures and healthy environments? Yes</p> <p>Please see attached document</p> <p>Q21. In your view, do the strategies (4.1 - 4.15) address the things that matter most to you in relation to responsible governance and community leadership? Yes</p> <p>Please see attached document</p> <p>Q23. In your view, do the priority actions (4a - 4q) address the things that matter most to you in relation to responsible governance and community leadership? Yes</p> <p>Please see attached document</p> <p>Q25. In your view, do other aspects of the plan address the things that matter most to you in relation to responsible governance and community leadership? Yes</p> <p>Please see attached document</p>	<p>will inform the development of clearer guidelines and potential updates to local laws, with a focus on prioritising indigenous species, supporting biodiversity, and reducing invasive plants.</p> <p>We also note your concerns about the visibility of environmental initiatives within the Plan, particularly in relation to biodiversity. Nillumbik's Urban Tree Canopy and Biodiversity strategies provide the long-term frameworks for protecting and enhancing our natural environment. These include actions such as offset planting, habitat connectivity, ecological monitoring, and invasive species management. Council is committed to strengthening implementation, monitoring, and reporting under both strategies.</p> <p>We further acknowledge your comments on funding transparency and the alignment between strategic commitments and budget allocations. Council is continuing to explore ways to better communicate how resources are allocated and how they support the delivery of actions across the Council Plan and supporting documents.</p> <p>Your comments regarding advocacy and partnerships are also noted. Council is developing an Advocacy Framework that will highlight the importance of both in driving change and delivering outcomes that meet the needs of our community.</p> <p>Thank you again for your thoughtful contribution. Your feedback will play an important role in informing the finalisation of the Council Plan and associated strategies.</p>
DOC/25/64712	Refer to written submission 4.	<p>Thank you for your submission on the Draft Council Plan 2025–2029. We appreciate the time and thought taken to review the document and provide detailed feedback.</p> <p>We welcome your positive comments regarding the clarity and readability of the draft Plan.</p> <p>Your suggestions to strengthen Council's advocacy efforts—particularly in relation to affordable and diverse housing, biodiversity, and infrastructure funding—are noted. These areas remain key priorities for Council and are reflected across multiple sections of the Plan. In particular, Council continues to advocate for housing outcomes that reflect local character and community expectations, while also seeking stronger support from State and Federal Governments for infrastructure and service delivery.</p> <p>We note your feedback regarding Action 4.7. This action is intended to identify and pursue innovative funding opportunities to support community facilities, services and infrastructure. Housing policy and advocacy are addressed more directly under the themes of 'Our People' and 'Our Place' and will be further detailed in the finalisation of the Housing Strategy as well as the Neighbourhood Character Strategy.</p> <p>We acknowledge your suggestions regarding the New Resident Welcome Pack. Council has a new residents welcome pack and while it is limited in what it can include, it does provide a summary of key Council services and local information, with links directing new residents to more detailed content available on Council's website. This includes links to the Creative Infrastructure Framework, which provides a strategic approach to planning, developing and managing arts and cultural spaces to support creative practice and community participation. Furthermore, residents can access Nillumbik's Urban Tree Canopy Strategy 2024–2040 which provides the framework for protecting existing trees, increasing canopy in low-coverage areas, and encouraging planting on private land.</p>

Unique ID	Submission	Officer response
		<p>This strategy also emphasises the importance of managing canopy loss through offset planting and data-informed planning. Your suggestion to strengthen data tracking and transparency is valuable and will be considered as part of the ongoing implementation of this strategy.</p> <p>We also acknowledge your suggested editorial changes. These have been reviewed and updated in the final version of the document.</p> <p>Your feedback will inform the ongoing refinement of the Council Plan and its supporting strategies.</p>
1548	<p>Refer to written submission 5.</p> <p>Q3. In your view, do the strategies (1.1 - 1.10) address the things that matter most to you in relation to inclusive living and participation? Not answered</p> <p>Strategies 1.5, 1.6 and 1.7 are focussed on community participation and volunteering, and empowering our community. Councils' support should include the ongoing hosting of the Landcare coordinator role, as this role gives our hard-working land management volunteers the much-needed background support to continue doing what they do best - improving our natural environment and viable lands. Without this role, many of our landcare volunteer groups suffer from burnout and waning membership. Nillumbik SC should commit to continuing this role even if state government funding for the role were to be revoked.</p> <p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? Not answered</p> <p>The Green Wedge Protection Group note councils addressing of the state government housing targets and ensuring that those housing goals are in keeping with desired Neighbourhood Character. We recommend that council consider investigating the number of illegal dwellings already existing across the shire, bring those properties up to Code so that they become rateable properties and thus contribute to the required housing targets that have been set for Nillumbik. The Green Wedge Protection Group supports improved transport services, however cannot emphasis enough the importance of improved public transport services and connectivity, as well as support for an expected increase of ebike usage for both recreation and transport.</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? Not answered</p> <p>See comments above. Also Priority Action 2l is supported, and the GWPG encourage council to provide greater guidance to our community on where and what to plant. A council initiative should include the investigation of existing nature strip plantings particularly where non-indigenous and often invasive species have been used. A support program offering the "offending" households replacement indigenous plants may provide better outcomes than direct compliance action, although compliance action should still be a considered option if required. Any active education program should also include management guidance for roadsides and nature strips where native vegetation is found, discouraging the mowing and general "tidying up" of these areas, as well as discouraging any additional planting within vegetated road reserves. Strategy 2.8 and Action 2m - could this include a review of the GWMP to consider emerging issues that impact our rural character and natural areas? Such as: o Tiny homes, o Shipping containers (covered in the Local Laws but needs strengthening) o More urgency on weed management and control, including implementation of the CaLP Act . o Roadside management, to include issue of mowing, planting and landscaping, grading, herbicide use, o Issue of classification and management of Burgan , and its listing under schedule to Clause 52.17 o Long-overdue statutory reviews of ESO's and SLO's. o Increased "industrialisation" of rural properties by earthmoving contractors etc using site for vehicle storage.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>Council welcomes your support for the overall direction of the Draft Council Plan 2025–2029 and acknowledges the Green Wedge Protection Group's long-standing contribution to environmental advocacy in Nillumbik.</p> <p>We note your comments on the Green Wedge and reaffirm Council's commitment to protecting Nillumbik's unique identity as the Green Wedge Shire. Ensuring our planning and environmental policies reflect and uphold the Shire's conservation values remains a core priority.</p> <p>Your reference to the State Government's Planning for Melbourne's Green Wedges and associated actions is noted. Council will continue to monitor these developments and assess any implications for the Green Wedge Management Plan. The ongoing implementation of Council's Green Wedge Management Plan, Biodiversity Strategy 2024–2034, and Urban Tree Canopy Strategy 2024–2040 will support the protection and enhancement of Nillumbik's natural environment, alongside broader planning reforms and strategic reviews.</p> <p>Your specific suggestions relating to tiny homes, shipping containers, weed management, roadside practices, and local planning overlays (ESOs and SLOs) are appreciated. These intersect with Council's responsibilities in land management, compliance, and planning regulation and may warrant further consideration through future policy reviews.</p> <p>We acknowledge your feedback on the Housing Strategy and the need for a strong local response to the State Government's Housing Statement. The Draft Council Plan includes actions to finalise the Housing Strategy, which aims to provide for diverse, accessible and compliant housing while maintaining local character. Council also recognises the importance of advocacy and will continue to work with peak bodies such as the MAV where state reforms do not align with local needs.</p> <p>Your suggestion to identify and regularise illegal accommodation has been noted and will be considered in the context of planning enforcement, building regulations and broader housing objectives.</p> <p>We also acknowledge your support for the Peri-Urban Deer Control Plan and your recommendation to promote tools such as FeralScan to support local monitoring. Deer management remains a focus within Council's land and biodiversity programs.</p> <p>Finally, we appreciate your comments regarding community consultation and the desire for feedback to result in meaningful change. The development of the Draft Council Plan has been underpinned by both broad and deliberative engagement processes. As part of Council's continuous improvement, we are reviewing our Communications Strategy and Community Engagement Policy to better support inclusive, transparent and accessible engagement. This includes exploring ways to more visibly reflect community feedback in Council's planning and decision-making.</p> <p>Your feedback on these important issues will be carefully considered as part of the ongoing review and refinement process</p>

Unique ID	Submission	Officer response
	<p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>The Green Wedge Protection Group VERY STRONGLY support Strategy 2.13 and Priority Action 2s. The greatest losses of biodiversity and native vegetation often occur due to non-permitted vegetation removal and other site impacts. Without genuine responses to issues such as illegal vegetation removal, earthworks or soil dumping, and ensuring effective enforcement outcomes that include site remediation and possible prosecutions, we will see a continued decline in biodiversity and habitat values and an increase in rural land degradation across Nillumbik. We cannot continue throwing money at programs such as community environmental education, environmental grants, sustainable farm management, and revegetation works while we continue to ignore the elephant in the room - aka appropriate compliance action against planning breaches. Protecting existing areas of habitat and biodiversity importance, through both education and appropriate compliance action, will provide better "bang for buck" when aiming to retain biodiversity values and improve resilience of the natural environment during this time of climate change.</p> <p>Q15. In your view, do the strategies (3.1 - 3.10) address the things that matter most to you in relation to sustainable futures and healthy environments? Not answered</p> <p>Again, Strategy 3.8 include emphasis on environmental development around low impact development and climate-responsive design. One of the greatest contributors to our emerging and ever-present climate disaster is the broadscale loss of natural areas world-wide. Encouraging sustainable design in all developments is important. Even more important is keeping developments away from environmental areas, ensuring all developments practice vegetation avoidance in preference to vegetation loss minimisation. Discourage development in bushland or areas of important habitat value, where losses will be both immediate (direct losses due to site development) as well as long-term incremental (degradation of surrounding habitats through human activity, weed influx, altered hydrology, breaks in habitat continuity, etc)</p> <p>Q17. In your view, do the priority actions (3a - 3o) address the things that matter most to you in relation to sustainable futures and healthy environments? Not answered</p> <p>Green Wedge Protection Group support all listed Priority Actions 3a-3o, and encourage council to further consider the concerns we have raised above.</p> <p>Q21. In your view, do the strategies (4.1 - 4.15) address the things that matter most to you in relation to responsible governance and community leadership? Not answered</p> <p>Green Wedge Protection Group commend council on their commitment stated in 4.11 "promoting robust, fair and transparent approaches to maintaining compliance and enforcement. The Priority Action 4o is an important consideration when delivering on this strategy (see below)</p> <p>Q23. In your view, do the priority actions (4a - 4q) address the things that matter most to you in relation to responsible governance and community leadership? Not answered</p> <p>Priority Action 4g could also emphasise "minimise negative impacts to the natural environment including avoiding/minimising loss of native vegetation and significant trees". Priority Action 4o provides some level of commitment to keep community informed, within the bounds of both privacy and legal restrictions around planning or local laws breach investigations. Council often relies on the Nillumbik community to be the unpaid eyes and ears who are out on the</p>	

Unique ID	Submission	Officer response
	<p>ground witnessing land use breaches. Community members risk putting their heads on the chopping block when they provide information to council relating to local laws or planning breaches. There is a loss of community confidence in council when risks are taken to provide information around planning and local laws breaches, without there being any follow-up communications or visible evidence of site remediation or other positive outcomes. It is therefore important that council is both transparent with regard to actions they take AND to also provide follow-up to the community.</p> <p>Q38. In your view, do other aspects of the plan address the things that matter most to you in relation to increasing active living? Not answered</p> <p>Important that we consider the point mentioned in "Climate Changes Impacts on Health: having a resilient natural environment" MUST focus on the retention of, and minimise damage to, existing natural areas as well as improve connectivity between those areas. Healthy ecosystems extrapolate to healthy human environments and healthy human minds, and the health of our natural ecosystems starts with placing the protection of remnant habitats and biodiversity hotspots as a highest priority.</p>	
1549	<p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? No</p> <p>No strategic indicators for protection of biodiversity Strategic indicator for bike paths should be charged to shared trail network (equine, pedestrian, bike etc).</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We note your support for the strategies and priority actions relating to liveable and connected communities.</p> <p>Your suggestion to include a dedicated strategic indicator for biodiversity protection will be considered. More detailed and specific measures and monitoring actions can also be found in Council's Biodiversity Strategy 2024-2034. We also acknowledge your suggestion to broaden the bike paths indicator to acknowledge broader usage of the Trail Network.</p> <p>These insights will be carefully considered as part of the ongoing review and refinement process of the plan.</p>
1550	<p>Supporting information received – Forms part of the confidential (Attachment 3, submission 6).</p> <p>Q3. In your view, do the strategies (1.1 - 1.10) address the things that matter most to you in relation to inclusive living and participation? Yes</p> <p>Q5. In your view, do the priority actions (1a - 1m) address the things that matter most to you in relation to inclusive living and participation? No</p> <p>I wonder if Action 1i) "Work in partnership with the Northern Councils Alliance (NCA) to advocate to the State Government to strengthen policy to support delivery of Affordable Housing in Nillumbik ." will address the urgent and growing need for suitable housing for Nillumbik 's large proportion of ageing residents?</p> <p>Q7. In your view, do other aspects of the plan address the things that matter most to you in relation to inclusive living and participation? Yes</p> <p>Q9. In your view, do the strategies (2.1 - 2.19) address the things that matter most to you in relation to liveable and connected communities? No</p> <p>I believe in addition to Strategy 2. about advocating for "planning outcomes to balance housing needs with protection of local neighbourhood", there needs to be a specific strategy to WORK with government, community and developers to help create more and appropriate housing options for Nillumbik's ageing residents. Our Shire has the highest number of over 65's in all of Melbourne, and those residents helped create our unique community. They want to stay here and should be helped to do that, rather than be forced to leave because of a lack of suitable housing near their friends and lifelong services. Council must recognise this need and do more than advocate.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We note your support for the strategies relating to inclusive living and participation, as well as your reflections on areas that could be strengthened in relation to affordable and diverse housing to support ageing in place.</p> <p>Your comments regarding 'advocating for planning outcomes that balance housing needs with the protection of local neighbourhood character and the unique identities of our communities' and the need for a dedicated focus on partnerships and advocacy to deliver age-appropriate housing options are noted. These comments align with the work underway to finalise the Nillumbik Housing Strategy, which will provide a clearer direction for enabling diverse, accessible housing that allows older residents to age in place and stay connected to community, services, and long-standing social networks.</p> <p>We note your suggestion for Council to take a more active role in advocacy and partnership initiatives to support delivery. Council is developing an Advocacy Framework, which will recognise that both advocacy and partnerships play a critical role in shaping outcomes that meet the needs of Nillumbik's residents. Further, a proposed new initiative within the Council Plan, supporting infrastructure for all life stages also reinforces this direction.</p> <p>We also acknowledge your suggestion under responsible governance to introduce greater flexibility in the administration of community grants, to support new and innovative local initiatives. Council acknowledges the importance of supporting new and innovative initiatives, and we note that different grant programs are designed with specific purposes and outcomes in mind. As such, each program has its own criteria, often shaped by funding sources or broader strategic goals. We are committed to regularly reviewing our grant programs to ensure they remain responsive, inclusive and aligned with community needs.</p> <p>Your comments will be carefully considered as part of the ongoing review and refinement process of the plan.</p>

Unique ID	Submission	Officer response
	<p>Q11. In your view, do the priority actions (2a - 2ad) address the things that matter most to you in relation to liveable and connected communities? No</p> <p>For Strategies 2.17, 2.18 and 2.19, there needs to be a priority action around recognising the biennial Rotary Eltham Art Show as a Major Event and giving it commensurate support. It was lately ineligible for a triennial grant because it is not an annual event (similar to the Nillumbik Contemporary Art Prize). Please read the triennial grant application to see all the ways this event supports “distinctive and creative communities”. It has proven its worth, and deserves to be supported and celebrated as a Nillumbik event worth keeping.</p> <p>Q13. In your view, do other aspects of the plan address the things that matter most to you in relation to liveable and connected communities? Yes</p> <p>Q21. In your view, do the strategies (4.1 - 4.15) address the things that matter most to you in relation to responsible governance and community leadership? No</p> <p>I wondered if there ought to be a section encouraging Council to regularly review, or provide for flexibility in the determination of community grants such that new or innovative programs or events are not lost or precluded from support by strict application of funding criteria.</p> <p>Q23. In your view, do the priority actions (4a - 4q) address the things that matter most to you in relation to responsible governance and community leadership? Yes</p> <p>Q25. In your view, do other aspects of the plan address the things that matter most to you in relation to responsible governance and community leadership? Yes</p>	
DOC/25/58499	Refer to written submission 7.	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We note your call for Council to move beyond 'business as usual' in response to the growing urgency of climate and ecological issues. Your submission highlights a broad range of opportunities to enhance Council's environmental leadership, particularly in relation to roadside ecology, biodiversity, and meaningful community involvement.</p> <p>Your comments relating to increasing support for volunteer groups and expanding the Land Management Incentive Program align with Council's ongoing delivery of initiatives that encourage local conservation efforts. Feedback regarding the inclusion of wildlife and biodiversity-focused groups in community leadership opportunities and volunteering programs will be considered in the context of inclusive community participation under the theme of 'Our People'.</p> <p>We note your emphasis on specific environmental metrics and monitoring. While not all proposed indicators may be included in the final plan, Council acknowledges the importance of robust, measurable outcomes and will review the feasibility of incorporating more targeted biodiversity and canopy indicators. Additional data and indicators are also captured in the Nillumbik Biodiversity Strategy 2024-2034 and the Urban Tree Canopy Strategy 2024–2040 which outline a range of actions focused on reducing canopy decline, habitat protection, reducing threats to native wildlife, and improving ecological connectivity, which together contribute to the broader goal of safeguarding wildlife across the Shire.</p> <p>We note your observations regarding the importance of road safety with respect to wildlife and the value of capturing wildlife impacts across the Shire, including your suggestion to reinstate the strategic indicator 'number of dead animals collected by Council' which will be reflected in the final plan. Further, your comments that support pedestrian and animal safety, are noted and an additional priority action has been added to the plan that addresses driver behaviour and its impact on wildlife trauma.</p> <p>We also note your feedback in relation to Council taking a more active role in advancing environmental initiatives that require greater investment and sustained effort. Council is developing an Advocacy Framework which will recognise the vital role of partnerships and collaboration with other levels of government and external organisations in delivering outcomes beyond the Shire's immediate resources. Council will continue to align its strategic priorities with advocacy and funding opportunities to support long-term environmental outcomes for Nillumbik, as outlined in key strategic documents including the Climate Action Plan 2022–2032.</p>

Unique ID	Submission	Officer response
		<p>Your input regarding roadside and nature strip planting, mowing practices, and the use of indigenous species in the public realm is appreciated and aligns with Council's focus on rural character and sustainable land management. We note your concerns regarding nature strip management and enforcement. Action 2l, which proposes the development of an issues and options paper, is specifically intended to address these issues. This work will explore current challenges and will inform clearer guidelines and potential updates to local laws to better support biodiversity, prioritise indigenous planting, and reduce the spread of invasive species.</p> <p>Your comments on the need to improve accessibility and transparency in community engagement are also noted. The Council Plan was developed through a two-phase engagement process designed to ensure both broad and detailed input could shape the Plan's direction and content. Feedback such as yours will help inform the review of Council's Communications Strategy and future engagement approaches, particularly in strengthening how community voices are reflected in planning and decision-making.</p> <p>Thank you again for your thoughtful submission. Your feedback will be considered as part of the refinement of the final Council Plan.</p>



Nillumbik Council Plan 2025 - 2029
Wildlife Advocates of Nillumbik Submission

Who We Are

Wildlife Advocates Nillumbik is a community group that works to improve the safety and protection of native wildlife. We try and further that aim through education and advocacy. Our organisation includes members with specialist knowledge of wildlife rescue, wildlife care, treatment of infectious wildlife diseases, impacts of habitat loss and impacts of climate change. WAN has held one public meeting and participated in others. Our members predominantly live in semi-rural areas of Bunjil and Sugarloaf but with support from other areas both rural and within the Urban Growth Boundary.

METRICS

Under Place and Space

- Please retain the “number of dead animals collected by Council”. Although it’s not indicative of total fatalities it does show consistent trend data (which we now have for 4 years). This is the only “official” wildlife trauma data we have.

BUDGET

- Please add budget for virtual fences – the cost of \$10k/Km, installation and monitoring. Our estimate is \$100k
- Please add budget for more arboreal bridges – we suggest using existing designs to reduce consultancy fees. Estimation \$50k.

Other Requests/Information

- We appreciated access to a grant to enable us to print and distribute “who to call when you see wildlife in need” cards during the last Council term. Plus Council issuing wildlife numbers in their newsletter. We will always be happy to work proactively with Council on communication issues.
- We understand Wildlife Vic is working with some Councils to help reduce wildlife trauma and RACV has also promoted some new measures (as car insurance is obviously impacted by increased accidents). [How to drive safely around wildlife and minimise injuries | RACV](#)
- Macedon Ranges have the biggest issue with wildlife trauma on the roads. They have done some really interesting things to try and reduce this. They also held a very interesting community event on “Reducing the Road Toll Forum” [Living with wildlife - Macedon Ranges Shire Council](#). We would love to be part of a similar community event here in Nillumbik.
- I’m sure you are all aware and appreciate of our wildlife rescuers and carers in the Shire. They make the roads a safer place (and kinder) at a not inconsiderable personal expense. Any act of recognition for them (maybe an article in the Newsletter or an invitation to discuss issues they face) would be highly appreciated.

We also support all work to improve biodiversity and tree management in the Shire. Our wildlife is integrated into such a complex eco system. Although road trauma is the biggest killer we can also help with stopping habitat removal and improving what is left. I believe these will be addressed in more detail by specific community groups.

Thanks you for the opportunity to input into this very important process.

Wildlife Advocates of Nillumbik Committee

February 2025



Nillumbik Council Plan 2025 – 2029 – Version 2

Wildlife Advocates of Nillumbik Submission

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METRICS

Under Our Place and Connected Communities

- 2g Please add under the road safety priority action “including interactions with wildlife”
- 2q Please make the priority action less passive by using the words from the former plan “implement measure to protect wildlife across a range of settings, including roadsides”
- 2q Retain the strategic indicator “number of dead animals collected by Council”. Although it’s not indicative of total fatalities it does show consistent trend data (which we now have for 4 years). This is the only “official” wildlife trauma data we have.

BUDGET

- Please add budget for virtual fences – the cost of \$10k/Km, installation and monitoring. Our estimate is \$100k
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Wildlife Advocates of Nillumbik Committee

July 2025

From:
Sent:
To:
Cc:
Subject:

Tuesday, 1 July 2025 1:14 PM

Nillumbik

Draft Council Plan 2025-2029

Please find below the input from Wildlife Advocates Nillumbik (WAN) with respect to the latest draft Council Plan.

In our original input in February, we asked that the Strategic Indicator "number of dead bodies collected by Council" be retained in this terms plan. It appears to have been deleted.

Source: Council records

Number of dead animals collected by Council

Source: Council records

We strongly request this metric is reinstated as it is the only metric, publicly available form Council, that indicate the level of road trauma caused by animal collisions. We need this data if we are to fight to make our roads safer.

Many thanks,

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 1 July 2025 1:29 PM
To: Nillumbik
Subject: Council Plan 2025- 2029

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi,

I believe it is important for Council to keep monitoring the dead animals that are collected from the roadside as a result of car-strike, and to make this data public. There were 4 years of data on the website but this appears to have been removed.

Can the Strategic Indicator "number of dead animals collected by council" be included in this year's plan please?

Warm regards

[REDACTED]

Friends of Nillumbik Inc.

P.O. Box 258 Eltham 3095

mail@friendsofnillumbik.org



Submission to Participate Nillumbik in response to draft Council Plan 2025-29

Friends of Nillumbik Inc. (FoN) provides this written submission in response to Nillumbik Shire Council's (NSC) invitation to provide feedback on the draft Council Plan 2025-2029.

Summary Response

FoN extensively supports the draft Council Plan 2025-29 (the Plan) and is encouraged by the more robust plan engagement and development processes applied to this Plan.

We support the Message from our Councillors, including its valuing of Nillumbik's environment, including '*protecting local waterways, sustaining our urban tree canopy, and conserving biodiversity*' as being '*essential to long-term liveability and environmental wellbeing*'. We also note and support emergency preparedness and response, along with improved road safety and public transport. We think that this message should also be recognise current threats that Council must attend to, primarily the State Government's housing targets and the need for Council to engage effectively with the community to protect neighbourhood character inform housing diversity and planning amendments.

We support the Vision Statement and, although developed by a previous Council, is still relevant and appropriate for the foreseeable future of Nillumbik.

Themes summary comment.....

Timing of the Plan

We understand this Plan will only be effective from July 2026 onwards, approaching halfway through this Council's term, with the Council Budget 2025-2026 already approved and fundamentally drawn from the previous Council's priorities. The Council Plan should be developed earlier to reflect the current Council makeup and inform the first full year budget in a Council's term.

Theme 1 – Our people – inclusive living and participation

We agree with the majority of the strategies and priority actions under this theme, and suggest some improvements:

- Reflecting on our past experience in making written and verbal submissions to Council on many issues, and that few of these have resulted in any improvement to the subject draft Strategy or Plan, we suggest an increased commitment by Council as follows, in addition to **Priority Action 1e)** or as a separate point: '*Ensure inclusive participation in*

decision-making by actively considering community input through Participate Nillumbik including submissions and presentations to Council.'

- The strategic indicators for this theme are limited and cover few of the proposed strategies and actions. A much improved set of indicators is needed, considering which strategies and actions are most important to delivery of the theme objective and on which Council may have a larger influence. For example, strategic indicators could include: proportion of mothers and babies involved in maternal health services; proportion of child population fully immunised; number of ageing in place homes; or perhaps some of the key indicators proposed in the Nillumbik Health and Wellbeing Plan 2025-2029.

Theme 2 – Our place – Livable and connected communities

The shared vision is appropriate and reinforces the importance of the Green Wedge and our natural environment and biodiversity. However, the title of 'livable and connected communities' and the objective appear to focus entirely on the built environment.

We would suggest an addition to this objective to include: **'We value our Green Wedge and protect and enhance its natural environment and biodiversity.'**

We agree with the majority of the strategies and priority actions under this theme, and suggest some improvements:

- Given the critical nature (both a threat and an opportunity) of the State Government housing targets to Nillumbik's distinctive neighbourhood character and environment, indeed its essence, significant attention should be given to this issue. We suggest **Priority Action 2a)** should be much stronger, for example: *'In response to State Government housing targets (additional 6,500 new dwellings by 2050), **strenuously seek to secure** housing and planning reforms that protect local neighbourhood character **and Nillumbik's unique natural environment.**'* Similarly for **Priority Action 2b)** *'Update and finalise the Nillumbik Housing Strategy to **secure** diverse housing options near transport hubs and within our activity centres and townships to create connected, sustainable communities that support our community to 'age in place'.'*
- Priority Action 2l) is a welcome addition, except that to simply seek to prepare an issues and options paper over the next four years is inadequate. Council cannot meet its current operational obligations for management of nature strips and roadside planting, a high proportion of properties do not comply with the current Local Law, and Council is incapable of enforcing it. We suggest an amended **Priority Action 2l) 'Review current Local Law and rules, and develop and implement guidelines regarding nature strips and roadside planting that prioritises indigenous species, **reduces invasive species and increases biodiversity.**'**
- Priority actions under sub-theme **Protection of Biodiversity** are totally inadequate. The Message from our Councillors, as referred to above, stresses the importance of the environment and biodiversity in Nillumbik, but this importance is not reflected in this sub-theme. Indeed, the specifics associated with environment and biodiversity are insignificant when compared with, for example, the listing of projects under Priority Actions 2u), 2v) and 2w). Far more attention (and funding) is given to dog parks,

recreational trails and BMX parks than to the environment. One of the primary objectives of the Biodiversity Strategy is to arrest the decline of biodiversity in the Shire, but there is no hope of that with current funding and lack of more specific priority actions and strategic indicators. Significant additions to **Priority Action 2q** is warranted, and we suggest a selection of the following actions from the Biodiversity Strategy be adopted (some of which may be already included in the Implementation Plan, but we are not privy to this document):

- *Implement and enforce Council's regulatory tools that support biodiversity protection.*
- *Increase the conservation values (e.g. restoration and improved connectivity) of Council's reserves, wetlands and roadsides.*
- *Determine where there are opportunities for new or replacement planting in parks, reserves, activity centres and along urban streets; and implement a long-term planting (and tree maintenance) program.*
- *Seek investment and commitment from all levels of government and other funding bodies to help monitor, protect and enhance the Shire's biodiversity.*
- *Identify opportunities for Council and the community to participate in training, programs and initiatives that Care for Country and build cultural awareness with Traditional Owners.*
- *Identify opportunities to enhance the condition, extent, connectivity and function of indigenous vegetation and ecosystems (terrestrial and aquatic) across the Shire — including through collaborations, investigations and targeted projects.*
- *Manage Council's 100+ bushland reserves and wetlands, and vegetation along Council roadsides, with available funds targeted in a strategic manner.*
- *Undertake and seek opportunities to monitor the distribution, abundance data and ecological information of Nillumbik's species and communities to help inform priority actions to prevent local extinctions.*
- *Work collaboratively to support the implementation of recovery plans for threatened species and ecological communities.*
- *Implement a biosecurity approach to guide the prioritisation and management of invasive species on Council land and seek opportunities to increase budget.*
- *Apply a landscape scale approach to reducing the presence of invasive species across all land tenures.*
- *Preserve high-quality fauna habitats and improve connectivity of habitat through restoration and invasive species management.*
- As with Theme 1, the strategic indicators for Theme 2 are limited and cover few of the proposed strategies and actions, and **none** relate to environment and biodiversity. We suggest inclusion of the targets or important indicators from the Biodiversity Strategy, such as: Net gain in extent of native vegetation (based on Ecological Vegetation Classes). Measured by Victorian Government approximately every 10 years; zero new local extinctions; improved condition of habitat in Council bushland reserves, based on an adapted habitat hectares assessment at point locations (with each reserve assessed every three years on a rolling rotation).
- Under **Services We Deliver**, we note that **Open Space Management** includes 'reserves and roadsides' along with parks, sportsgrounds and street trees. To improve transparency of actions and budgets, we suggest the services associated with reserves

and roadsides with their specific environmental objectives and their attendant budgets, be separated from other open space services.

Theme 3 – Our Future – Sustainable futures and healthy environments

We agree with the majority of the strategies and priority actions under this theme, in particular those associated with local climate action, and suggest some improvements:

- The inclusion of Open Space reserves and roadsides services and the implementation of the Biodiversity Strategy in Theme 2, while environment and conservation services (with references to bushland reserves and biodiversity) is included in Theme 3, is confusing. For transparency and clarity, we suggest Council reconsider how and where these categories of services are placed in the Plan.
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Theme 4 – Our Council – Responsible governance and community leadership

We agree with the majority of the strategies and priority actions under this theme, and suggest some improvements:

Budget submission.....

However, we register some concerns with the budget, and the lack of detail on proposed expenditure, as follows:

1. The budget is based on a primary assumption of zero growth in NSC service capacity, and the 3.00% increase in rates is caused by cost increases (inflation) alone. There appears to be **no or minimal allowance for any housing/rateable property growth** which would affect forecast revenues and expenditure through increased demand for services. **This shortcoming gives an inaccurate and potentially misleading view of the budget projections and should be addressed.**
2. There is **insufficient detail** in the budget document to ascertain where changes to expenditure are proposed, especially for large expenditure items. A request to NSC for this information, and for trend information over time, elicited no further details. **It is difficult to review and provide meaningful comment on the budget without this information.**
3. While there appears to be an increase in expenditure for Parks and Reserves Maintenance and Environment and Conversation, there is no specific mention of the critical actions or expenditure relating to the Green Wedge Management Plan 2019, the Biodiversity Strategy 2024 or the Urban Tree Canopy Strategy 2024-2040. **Specific mention and budget allocations to these strategies are necessary.**
4. There are **no service performance outcome measures relating to environment, biodiversity and climate action**, despite monitoring and outcome performance being

integral to commitments in these various strategies. **Appropriate service performance outcome indicators are requested for these items.**

5. Allocation of funds to capital replacements and renewals is below desired levels of funding over the forecast 10-year period. Council could potentially fund some of this shortfall through its operating surpluses and increasing cash reserves to maintain infrastructure and facilities to their required service levels.

Notes: What % of funds go to the environment???

Housing Strategy an important action

Many action areas. Difficult to allocate funds across all areas.

Specific Comments on draft Budget 2025-26

1. Expenditure for Environment, Biodiversity and the Green Wedge

As some limited examples of the commitment of NSC to the environment and biodiversity:

- The Green Wedge Management Plan 2019 (GWMP) states in its Vision: *‘Management of the Nillumbik Green Wedge will **lead the way** [our emphasis] in supporting a vibrant, resilient, connected and diverse community; living in the landscape to enhance the environmental, social and economic sustainability of Nillumbik’s green wedge. Council will ensure that the natural environment of the green wedge is preserved and nurtured for current and future generations. ... Harnessing the shared values of our community and supporting their commitment to managing the green wedge will be the key objective over the 10-year lifetime of this plan.’* Further, the Monitoring and Evaluation section of the GWMP states: *‘Annual implementation plans will be prepared and reported on through Council’s annual planning, budgeting and reporting processes. **Expenditure and activity associated with this plan will be tagged in Council’s public budget** and performance statements to inform the community on its progress.’*
- The Biodiversity Strategy 2024-2034 in its Supporting Strategies included: *‘Embed delivery of the Biodiversity Strategy within the CEO’s contract / performance plan.’*, as well as commitments to allocate time and resources to the Strategy that reduced the presence of invasive species, encourage revegetation and restoration of reserves and roadsides, supporting landholders in managing biodiversity, protect threatened species, etc.
- The Urban Tree Canopy Strategy, similar to the above, proposes that funding for its initiatives will be considered in Council’s annual budgeting process. Importantly, it includes a range of initiatives that include: developing a Tree Inventory; developing and implementing an Urban Tree Maintenance, Planting and Renewal Plan; and implementing the Local Law and other actions to reduce and eliminate non-permitted clearing / removal of trees from Council and private land.
- The Council Plan Quarterly Performance Report 2024-25 – Q2, reported that *‘No funding is allocated to the implementation of the Green Wedge Management Plan (GWMP) as a ‘stand-alone’ initiative in the 2024-2025 financial year, therefore actions must be funded through grants or allocation to projects that support the actions.’* Similarly, this report

made commitments to address The Year 1 Biodiversity Implementation Plan (2024-25) and the Year 1 Key Urban Tree Canopy Actions (2024-25) in 2025.

- The current level of funding for programs such as invasive species control on both private and Council land, management of roadside reserves, and arresting declining biodiversity are totally inadequate.

It is a **significant omission** in the budget that there is no explicit funding or indeed even a mention, of these strategies, given their stated importance to the community and the clear NSC commitments to their budgetary consideration. **Further, the budget allocations appear to be insufficient to deliver on environmental and biodiversity commitments.**

2. Service Performance Outcome Indicators

Given the apparent emphasis in the budget document and apparent budget allocations relating to environment, biodiversity and climate action, it is incongruous to find that there are precisely **zero** service performance outcome indicators for these items. This appears to be a serious shortfall. Many potential measures and suggested targets are proposed in the relevant strategy or plan documents, but none have found their way to the budget. Eg, Achieving a net gain in the extent, connectivity and condition of habitat. We understand that the indicators included in the budget are a standard set developed by Local Government Victoria for all councils.

We consider this inadequate. NSC should develop appropriate indicators and targets to reflect actions and commitments to the environment, biodiversity and climate action.

These indicators may also be appropriate for other councils and could be developed in conjunction with Local Government Victoria.

3. Capital Replacements and Renewals

Allocation of funds to capital replacements and renewals appears sufficient in the 2025-26 year, but is well below desired levels of funding over the forecast 10-year period, especially capital replacements. The budget states that Council is reliant on external funding sources to achieve the desired outlays, which it appears has been met for 2025-26. We are concerned that a funding shortfall in the projections will result in a deterioration in infrastructure and facilities. Could Council potentially fund some of this shortfall through its operating surpluses and cash reserves, or find a more reliable way to gain an external funding commitment?

We ask: Does our community want Council to have cash in the bank or roads with fewer potholes and facilities that are safe? We certainly do.

We look forward to presenting our submission to the Planning and Consultation Committee.

Thank you.

Sincerely,



Friends of Nillumbik Inc.

mail@friendsofnillumbik.org

7th July, 2025

SUBMISSION ON DRAFT COUNCIL PLANS 2025

SUBMITTER: Eltham Community Action group (**ECAG**)

CONTACT EMAIL ADDRESS: elthamcag@yahoo.com

DATE: 8 July 2025

SUBMISSION

ECAG's submission on the *Draft Council Plan 2025-2029*, the *Draft Asset Plan 2025 – 2035* and the *Draft Municipal Health and Wellbeing Plan 2025 – 2029* is as follows:

1. Draft Council Plan 2025 – 2029

This document is clearly written and easy to comprehend. It lays out information to the reader in such a way that the purpose of the document is not 'wordy' but is succinct.

ECAG would like Council to consider a few changes to reinforce or clarify some points and to make some additions.

1. Our People

Priority Actions

- on page 15:

2a) **Strongly** advocate for **adequate** funding of infrastructure by **State & Federal Governments in the light of the current planning reforms together with ensuring that the new** housing and planning reform protect local Neighbourhood Character.

Please consider using the wording in bold above that is stronger and clearer than the existing draft statement.

- Similarly, add the word **Strongly** before 'advocate' at the beginning of 2q and 2r.

3. Our Future

- At:

Protection and enhancement of the Tree Canopy	
Strategy How will Council work towards its objective?	Priority actions What will Council focus on?
3.6 Enhance the Shire's urban tree canopy as a means of climate adaptation, improving neighbourhood character and habitat, as well as liveability.	3i) Protect mature trees to reduce canopy loss, revegetate suitable areas with low tree coverage and support biodiversity through implementation of the Urban Tree Canopy Strategy.
3.7 Foster community stewardship of the urban tree canopy including in new developments through a 'New Resident' pack of information that is a welcome pack outlining all Council services and pertinent regulations	3j) Supply annual indigenous seedling vouchers for community to support sustainable planting and improving habitat on private land.
3.8 Develop and maintain in real time, a publicly available spreadsheet that collects data to show where and how trees have been removed from both private & public land and the species and size of each tree. This is in order to direct landholders and council to replace tree loss as close as possible to the original site and, if this is not possible on private land, on public land in the local community area.	

Please use either the wording in bold that we have inserted above or similar wording that mirrors the intent of the bolded wording. Regarding the strategy that we have suggested at 3.8, ECAG notes that off-set planting regulations do not ensure that the existing tree coverage is maintained in the same local area.

- on page 23 at:

'Edendale Community Environment Farm

We operate the farm as a hub for environmental education, offering programs, demonstrations, and a plant nursery, to connect the community with sustainable practices.'

Comment – Please delete the comma after demonstrations and replace it after nursery, otherwise it reads as if it is only the nursery that connects to the community.

4. Our Council

At page 25:

- 4.6 & 4.d - Insert the word shown in bold to become: 'proactively and **strongly** advocate.....'
- 4.7 - Reference back to the current State & Federal Government push to increase housing as the reason for the need to advocate for funding for new infrastructure because of increases in population.
- Add a new point:

4.8 Develop content of a Council 'Welcome Package' for new residents, either renters or owners. This will need the cooperation of estate agents.

The idea is that newcomers will need information about Council services, a little about the history and culture of the area (including environmental values & information) so that the area where they now live will be similar for future generations. Obviously, this will not be read by all but something is better than nothing. This area is unique and it needs to be made known to all residents.

2. Draft Asset Plan 2025 – 2035

ECAG has, for many years, been asking Nillumbik Council to make spreadsheets of tree removals both on private and public land.

The Draft Asset Plan demonstrates why this should occur and the glossary on page 3 quoted below makes this absolutely clear. Trees are assets.

Asset	An item, thing or entity that has actual or potential value to an organisation.
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Until Nillumbik Council understands that trees have 'an actual or potential value to an organisation' we will never fully be an environmentally forward thinking municipality – other Councils like Melbourne City Council plan for climate change, so it is possible here too.

On page 4 the Glossary states:

Renewals	Works to replace existing assets or facilities with assets or facilities of equivalent capacity or performance capability.
Replacement	Definition Value Cost the entity would incur to acquire the asset on the date that is reported. The cost is measured by

	reference to the lowest cost at which the gross future economic benefits could be obtained in the normal course of business or the minimum it would cost, to replace the existing asset with a new modern equivalent asset with the same economic benefits allowing for any differences in the quantity and quality of output and in operating costs.
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Council already plants and replaces trees so why are they not counted as assets? Admittedly they are living items or things but their existence has a value and, again, on page 3 the definition of Value could apply to trees.

ECAG realises that some 'original thinking' would apply to thinking about and accepting that trees are assets – if other municipalities do, why not Nillumbik?

Food for thought for the next 4-year Asset plan.

This Asset plan must accommodate the issues that will occur with the increased population proposed by the State Government.

Page 31 shows that it is being considered as follows:

Documentation	Requirements.
Eltham Lower Park Masterplan	Provides a strategic direction for the future development of the park by establishing a priority works plan to meet the needs of Council, permanent tenants, passive users and casual visitors
Eltham Major Activity Centre / Structure Plan	Sets out the overall vision, objectives, strategies and actions for the town centre of Eltham. It provides the scope for change, renewal and identifies the means of providing future physical infrastructure and community facilities.

In the 'Requirements' for the Eltham Lower Park Masterplan a reference to 'passive users' is missing. ECAG submits that this group should also be considered and reference to it should be inserted as shown above in bold. Please include those two words in the final document.

Pages 34-5 show that, in the 25 year timeline being considered in this document, the Nillumbik population will be raised by 10,000 people (using the document's figures 2021- 63,487 to 2046 to 73,089 residents).

Most of the increased population will live in dwellings in Eltham.

Eltham Central will have a 33.52% increase of 1,134 dwellings

Eltham E	“ “	6.98%	“	93 ‘
Edendale		7.97%		88 “
Eltham South		19.10%		224
Eltham North		8.72%		136

Page 36 states:

- Council **may** need to expand services and facilities to cater for the community growth.

Surely this should read 'WILL need' to expand services and facilities to cater for the community growth.

Again on Page 39 at:

Drainage

Demand Driver	Category	Change in Demand	Impact of Services
Climate change: annual rainfall volume within South-east Australia	Drainage	Annual rainfall expected to decrease 10% by 2030 and 35% by 2070	Less rainwater will increase the demand for uptake of stormwater for reuse. This • may require upgrades to existing infrastructure, or acquisitions, to fulfil these demands

. •**Surely this should read 'WILL require'**.

Elsewhere on page 39 there are a number of instances of '**may need**' that should be changed to '**will need**' in order to cope with climate change.

With the long timeframe being considered in this document a crystal ball would have been a useful tool in regarding climate change effects but the needs of an increased population are already apparent and planning should be developed for the worst case scenario rather than hoping for the best.

3. Draft Municipal Health and Wellbeing Plan (MHWP) 2025 – 2029

This high-level document is aiming to show how the overall MHWP is tying together six main aspects of concern to do with the health & wellbeing of the Nillumbik community and, at the same time, referencing other State & Council documents to show how Nillumbik is planning to comply with all aspects of concern and the legal requirements in the next four years.

As such complex documents are not easy for the average reader to comprehend, there need to be clear signs of what the practical outcomes are to be. Sentences with many adjectives tend to make statements unclear.

Until page 30 the document was basically 'setting the scene' with the average reader not being comfortable as to where the document was heading in practical terms.

The fact that Monitoring and Assessment procedures had been developed should have been flagged prior to the 'Setting the scene' sections.

It is only at page 19 that there was an obvious clear aim when priority areas were listed and then, finally, on page 30 of 33, there was what should have been far closer to the beginning – the Implementation.

Implementation

A detailed set of actions to support the implementation of the strategies in this Plan will be collaboratively developed annually across Council in response to local data, community engagement, and Councillor feedback. These actions will guide the implementation of the Health and Wellbeing Plan over its four-year lifespan.

These annually developed action plans will detail:

- *The actions to be delivered*
- *Timeframes for delivery*
- *Responsible Council teams*
- *Partner organisations involved*

The development and review of these annual plans will be undertaken in partnership with the Health and Wellbeing Advisory Committee, other relevant advisory committees, and through the Health and Wellbeing Partnership Forum. Both the Annual Action Plans and accompanying progress reports will be published on Council's website to ensure transparency and accountability.

It was very interesting reading this document as the 'setting the scene' sections did this comprehensively.

It would have been educative on page 21, where indicative targets were shown, to include past information and comparison statistics with other peri-urban LGAs as this would have given a more accurate picture. We are fortunate to be living here and comparing our statistics with urban councils does not give the full local situation.

EGAG would like Council to point out to residents the figures relating to Nillumbik in the loss of money per adult on gaming machines (page 27). That there is a \$190 per adult daily spend across 2 venues in Nillumbik, is astounding. ECAG suggests that the statements in the snapshots on page 8 of hospitalisation due to drug (both medical & illicit) and alcohol being higher in Melbourne also need more detailed information.

Local residents need to become more aware of these problems within our community. Spending on developing programs would be more accepted if the reality was known and understood.

It is to be hoped that, in the final document, a couple of possible omissions can be rectified:

Page 9: 7th dot point is marked as having x number of submissions.

Page 10: at line 4 a date needs to be inserted.



July 9, 2025

The Green Wedge Protection Group (GWPG) was formally incorporated in 1995, following municipal amalgamations. Less formally, the Group has existed since the early 1970s. The Purposes of the Green Wedge Protection Group include:-

- Working to ensure that residents and public officials of the Shire of Nillumbik act together to protect the environment; develop a high quality urban lifestyle within limited designated areas; and promote a rural lifestyle with sensitive farming and enhanced conservation objectives.
- Ensuring the Green Wedge is the strategic focus of the Shire of Nillumbik as outlined by the Local Government Review Board's final recommendation.
- Providing input to the Shire of Nillumbik and other decision making bodies on any matter considered relevant to the Green Wedge.

The Green Wedge Protection Group is heavily involved in state and local planning issues, both currently and prior to the group's formal inception, and will continue to provide advice and direction to authorities to ensure the intent of our Green Wedges is upheld at all levels of Government, and the values protected. The GWPG has involvement in the Green Wedges Coalition, and makes many submissions on state-level planning and environmental issues.

1.0 Green Wedge Concerns

The Green Wedge Protection Group (GWPG) would like to bring to your attention several areas in which we believe Nillumbik Council has dropped the ball. Nillumbik proudly calls itself The Green Wedge Shire, however, has done very little in the last 2 terms of council to ensure that it remains so. We would appreciate your consideration of the information provided on a few of the environmental problems that we believe need to be rectified if Nillumbik is to retain the mantle of The Green Wedge Shire. These issues should be considered **within the Council Plan, with additional discussion points included in Section 2.0:**

Major Concerns:

1. Illegal vegetation removal – there is a long history of communications between GWPG and Council around this issue and lack of appropriate compliance action. This will be covered in a follow-up letter.
2. Weed control and maintenance – concerns are a reduction in funding, and Nillumbik's lack of implementation of the CALP Act. See Appendix 3 for an article published in the Manningham and Nillumbik Bulletin. Appendix 4 lists 6 Regionally restricted weeds and some of their extensive infestations within Nillumbik, the majority of locations are on private land. There are at least another 21 Regionally restricted weeds within Nillumbik that should also be controlled. The following links provided for your information:
CALP ACT: <https://www.legislation.vic.gov.au/in-force/acts/catchment-and-land-protection-act-1994/072>
CALP Listed Species: <https://agriculture.vic.gov.au/biosecurity/protecting->

[victoria/legislation-policy-and-permits/consolidated-lists-of-declared-noxious-weeds-and-pest-animals](#)

3. Cat curfew – disappointingly, The Green Wedge Shire has failed to implement a 24 hr cat curfew, unlike neighbouring shires Manningham, Whittlesea and Yarra Ranges.

The GWPG strongly emphasizes the importance of ongoing Council support for Landcare. This includes maintenance of the Landcare Facilitator position. We currently have an excellent coordinator in Scott Allen – his enthusiasm and support for the Landcare groups is exemplary. We would strongly support his reappointment to this role. We also strongly endorse the continuation and enhancement of the Land Management Incentive Program (LMIP). We would also like to see the reactivation of the Forest Health Monitoring Program with the involvement of the Nillumbik Landcare Network. GWPG also recommends Nillumbik explore the creation of urban landcare networks and the development of Intrepid Landcare groups.

The following is the conclusion to the GWPG submission to Council on the 2024 Biodiversity Strategy which we include to reinforce our comments above:

“In conclusion:

The most impressive Biodiversity Strategy with lofty, ambitious intentions is only as good as the will of those who are in the position to implement those goals and ambitions. Sadly, there has been little will by councillors within the last two council terms to preserve Nillumbik’s biodiversity. The lack of will by both council and councillors to arrest illegal vegetation removal, to confront the ongoing wildlife carnage wrought by cats and the rampant spread of CaLP classified weeds across the shire are only three of the many major issues, left unaddressed by our recent past and current councillors, that are destroying our natural heritage. Ultimately it is the councillors that direct council actions, most have not risen to the occasion!

This Biodiversity Strategy needs to address these three issues with strong statements on direction and implementation timelines.

- Illegal removal of vegetation must cease, compliance and rehabilitation management plans are essential - to implement these actions requires a timeline of not more than twelve months.
- 24 hour cat curfews can be achieved within twelve months saving countless faunal lives.
- Weed control requires a longer term of commitment. The life of this Biodiversity Strategy will be around ten years. For effective control and maintenance of the shires burgeoning weed problems, a ten year strategy for weed control will need to be developed and included within the current draft Biodiversity Strategy. Ongoing funding for these initiatives is essential and immediate implementation required, prolonging implementation will only add further costs to both the environment and councils bottom line.

Thank you for the opportunity to comment on this draft plan. The objectives, content and structure of this Draft Strategy are commendable, and the Green Wedge Protection Group thank Council and staff for committing to the production of this important document. We now look forward to very positive biodiversity outcomes within our unique and highly valued Nillumbik Shire. “

Nillumbik Council was created under the Kennett Governments policy of Local Government Restructure. The Chair of the Local Government Restructure Board, Leonie Bourke, recommended the formation of the Shire of Montsalvat (later renamed Nillumbik) as a “conservation council, with the Green Wedge as its strategic focus” to “allow for better protection and enhancement of the natural resource base, sustainable land management, and provide a high quality environment for residents and visitors.”

2.0 Council Plan Discussion Points

The Council Plan will be a major plank in outlining this councils objectives, directions, goals and aspirations for Nillumbik over the next four years.

Nillumbik in the past has shown leadership, vision and innovative thinking that placed the Shire at the forefront of environmental sustainability, we are the Green Wedge Shire. This is not a slogan, but a reflection of our creation as a “conservation Shire with the Green Wedge as its strategic focus”.

Nillumbik as a Shire should build on its strengths, it is a wonderful place to work, live and to participate in a huge choice of recreational activities. Nillumbik is blessed with a rich and diverse environment that is loved and valued by its residents.

Nillumbik is not an economic powerhouse and to attempt to portray it as such is futile. Communities and small businesses should be supported, but through the lens of maintaining a clear focus on why Nillumbik was created.

Councillors will need to work cooperatively together and with the community, to produce a plan that reflects the combined goals as, too often, the bureaucracy impose their will upon the outcome. While we know that community consultation will be sought, it appears to be purely a box-ticking exercise, for generally, from past experience, it does not result in any effective change to the draft. This is your opportunity to make a positive impact on the future of Nillumbik by setting a progressive agenda within the Council Plan for the next 4 years.

Points to consider within the Council Plan development:

- Green Wedge Management Plan may need rewriting under State Government Action Plan: Planning for Melbourne’s Green Wedges and Agricultural Land future Key Actions 10 and 11. These Practices Notes will direct the production and standardise Green Wedge Management Plans. Issues that do require addressing include, but are not restricted to:
 - Tiny homes,
 - Shipping containers (covered in the Local Laws but needs strengthening)
 - Weed management and control, including implementation of the CaLP Act.
 - Roadside management, to include issue of mowing, planting and landscaping, grading, herbicide use,
 - Classification and management of Burgan
 - Long-overdue statutory reviews of ESO’s and SLO’s.
 - “Industrialisation” by earthmoving contractors etc using site for vehicle storage.
- Housing Strategy:
 - Develop a strong planning-based position in response to the state government’s Housing Statement
 - Work with Local Government organisations such as MAV, to unite against Government ill-conceived impositions,
 - Recommend that Nillumbik locates all illegal accommodation and provide retrospective permits by enforcing building codes to bring illegal accommodation up to code. This can have the triple benefit of removing illegal accommodation, improving the rate base, and coming part way to meeting the State Government housing objectives.
- ResCode concerns include, but not limited to:
 - Removal of third party rights
 - Proposed removal of neighbourhood character objectives and standards
 - Proposed changes to building setbacks, site coverage, building heights.

- Deer control:
 - Remain committed to the Peri-urban Deer Control Plan.
 - Encourage the use of the app FeralScan to monitor deer activity and movement.

In conclusion:

We thank the Nillumbik Shire Council for this opportunity to comment on the draft Council Plan 2025-2029. We support the document as presented, having made some comments and recommendations for further considerations in both this document and the online survey.

We congratulate all those involved in the formulation of this Draft and look forward to seeing the final endorsed document when it is released.

Regards



Green Wedge Protection Group

nillumbikgwpg@gmail.com

Green Wedge Protection Group c/o Smiths Gully Post Office 3760

Road and Roadside Ecology (RARE) Input to the DRAFT 2025 – 2029 Council Plan

Background

RARE, Roads and Roadside Ecology Northern Nillumbik is a local community group working to protect the environment in Nillumbik.

Over several years we have met with Council, made submissions in regard to Council policies and strategies, raised community environment concerns with authorities; both Council and State, and provided information to the community about works in the area that may impact the environment.

We thank the Council for the opportunity to input to the development of the 2025-2025 Council Plan. We are asking Council to consider moving beyond “Business As Usual” to allow us to keep abreast of our fast moving climate and environment. Our requests/suggestions are as follows (denoted in red):

1, Our People – Inclusive Living and Participation








Actions Pertaining to the current “Our People – inclusive living and participation”

Strategies	Priority Actions	Strategic Indicators	Budget Implications
	1e) Enable community leadership through supported networks and committees (including Council’s Advisory Committees). Could wildlife groups be included in this?		
	1f) Expand opportunities for community involvement through volunteering, including the Shire’s ‘Friends of’ groups.		Increase funding for Land Management Incentive budget to encourage conservation and biodiversity activities. Suggest increase to \$200k. This should tie to Biodiversity Plan actions.
		Add: surveying and reduction of Chilean Needle Grass ↓	Add \$100k. Should be in line with Biodiversity Plan actions.
		Add: Reinstate the biodiversity surveying on private property ↑	Add \$100k. Should be in line with Biodiversity Plan actions.
1.8 Address the social determinants of health	Add publicly shared, government accredited air quality stations in Nillumbik.	Add: Air quality ↑	\$tbd for air quality stations

Note: for every \$ invested by volunteers the return is \$3.70. Source: State of Volunteering in Victoria 2020. Vic Government.

2. Our Place and Liveable and Connected Communities

Strategies	Priority Actions	Strategic Indicators	Budget Implications
	2g) Prioritise pedestrian safety improvements to help inform capital works delivery by developing the following: • Road Safety Strategy Add: including interaction with wildlife	Maintain the metric from last terms plan “number of dead animals collected by Council”	
2.6 Encourage design in Council and community projects that respects and fits with Nillumbik’s neighbourhood and rural character.	2l) Support: Prepare an issues and options paper around potential guidelines regarding nature strips and roadside planting that prioritises indigenous species. ADD: <ul style="list-style-type: none"> • Support for Nature Strip Gardening Guidelines (details in PPT available). • Support for Rural Greening Project (details in PPT available). • Support for Roadside Maintenance Program Integrating Biodiversity (details in PPT available). 		
2.12 Protect and enhance the Shire’s	2q) continue to carry out long-term wildlife	Add - Number of surveys for threatened	Contain within current resources?









natural environment and biodiversity to preserve the unique character, heritage and ecological health of our community.	<p>monitoring to assess the health of Nillumbik's wet and dry forests</p> <p>Add less passive statement (from last terms plan): Implement measures to protect wildlife across a range of settings, including roadsides</p>	<p>species detected within the shire </p> <p>Add: number of dead trees removed </p> <p>Add – Increase in number of habitat hectares in Council owned land as measured using the government methodology. </p> <p>Add: Increase in biodiversity as measured by number of species detected during the regular surveys that we have included in the report and number and population indication of threatened species detected. </p>	<p>Increased funding \$tbd for the protection of all species and their habitat– not just for threatened species</p> <p>Environmental budget should be dedicated to the environment.</p>
	<p>Add - Review mowing policy: Reduce cost of mowing, fossil fuel consumption (carbon), increases biodiversity of plant species and wildlife (including invertebrates) reliant on indigenous vegetation. Increase area that is predominantly native grass cover in council managed roadsides, that does not require mowing – save cost, encourage shade cover. Lower fire hazard by encouraging native grasses on roadsides. See further details is Section 3.</p>	<p>Stop mowing areas of native grass on roadsides and reserves measured by # hectares where mowing has been stopped. </p> <p>Reduce mowing of vegetated areas in parks measured by # hectares where mowing has been avoided by expansion of native vegetation in reserves. </p> <p>Existing biomass to be retained and natural regeneration allowed on roadsides. </p>	<p>Aim to make a cost saving by revising policy</p>

2.13 Ensure consistent and effective enforcement of the planning scheme,	Add: Amenity table to be established to define the minimum fine for illegal removal of trees. Using Manningham method with ecological and lifetime carbon storage added.	Maintain the Strategic Indicator “Number of dead animals collected by Council” ↓ Add “Reduction in roadside speed limits in wildlife trauma hot spots” ↓	Minimal cost impact
2.16 Plan, maintain, and improve open spaces, streetscapes, and public places to enhance safety, accessibility and amenity.	2w) Partially Support: To further the Northern Recreation Trails Strategy, undertake a feasibility study to construct new section of trail connecting the Plenty River Trail (near Lear Court) to the Diamond Creek Trail at Allendale Road, east along the Maroondah Aqueduct across Diamond Creek Road.	Any action should maintain current biodiversity at a minimum or enhance. ↑	Funding may be required to improve biodiversity outcomes.
2.12 Protect and enhance the Shire’s natural environment and biodiversity to preserve the unique character, heritage and ecological health of our community.	DO not support current words: continue to carry out long-term wildlife monitoring to assess the health of Nillumbik’s wet and dry forests – this is far too passive. Use words from last Plan: Implement measures to protect wildlife across a range of settings, including roadsides		Add costs for virtual fencing trial (\$100k for 5km of fence and installation) Add costs for arboreal fauna bridges using a standard design to avoid consultation fees (\$50K) Speed limit reduction (and most effective method of reducing roadkill) = no cost
2.16 Plan, maintain, and improve open spaces,	Add: Increase number of rural roads accepted as “place” by	Increase number of rural roads accepted as “place” by Council and Vic Roads. ↑	No cost implications

streetscapes, and public places to enhance safety, accessibility and amenity.	Council and Vic Roads. Consider all non-arterial roads. Advocate for all non arterial roads to be considered “place” by Vic Roads		

3. Sustainable Futures and Healthy Environments

Actions Pertaining to the current “Sustainable Futures and Healthy Environments

Priority Actions	Strategic Indicators	Budget Implications
3b) Strengthen governance and accountability for climate action through implementation of the Climate Action Plan.	<p>Add:Account for stored carbon, biomass for biodiversity and climate. Use Infrastructure Sustainability Council metrics to provide meaningful quantitative data </p> <p>Add: Reduction of measured fuel hazard as measured by the only peer reviewed model for fire behaviour in SE States – Frame model. </p> <p>Add: Reduction in wind adjusted factor measured by CSIRO Vesta Mark II - Rate of Fire Spread model </p> <p>Add: actual carbon emissions (including embodied carbon from all Council projects - measured by Infrastructure Sustainability Council sustainability measurement tool. </p>	The cost of membership of the Infrastructure Sustainability Council is \$1,450 and they have reasonably priced training for Council staff
3i) Protect mature trees to reduce canopy loss, revegetate suitable areas with low tree coverage and support biodiversity through implementation of the Urban Tree Canopy Strategy.	<p>Delete - Number of trees planted in streets and parks to maintain tree canopy – as this does not take account of number of trees lost, their size or age</p> <p>Add:Increase in tree canopy measured by Nearmap. To consider increase in canopy, height, density and wind reduction factor </p> <p>Add: Number of trees removed illegally </p> <p>Add:Proportion of illegal trees removals legally prosecuted </p>	
Add: Establish and enhance the tree canopy of non urban areas of the Shire	Add: Reduction in wind adjusted factor measured by CSIRO Vesta Mark II - Rate of Fire Spread model 	No cost implications

<p>Add: Review Councils tree management policy and supporting guidelines.</p> <p>Add: All Council projects and operations that require a planning permit be obliged to apply and receive a permit (Council to reject \$2m exclusion limit from permit option).</p> <p>Add: All permit applications from Council to themselves be advertised.</p> <p>Add: As per clause 52.17 of the Planning Schedule; all Council projects which encroach on the Structural Root Zone (SRZ) or over 10% of the Tree Protection Zone (TPZ) of native trees be required to go through the Planning Department unless a written, independent arborist report confirms no future impact from the project will occur.</p> <p>Add: All tree removal or pruning works for safety reasons to have QTRA carried out. The QTRA/Nillumbik tree management guidelines risk table to be observed. Gross disproportion* in decision making for tree works be avoided. Where proportionality is questioned then an ecologist report can be written and considered. Finally, reassessment of the tree in 12 months can be considered instead of tree removal.</p>	<p>Add: Reduction of non compliant Council works. ↓</p>	<p>Minimal cost implications</p>
<p>3,6 Support: Neighbourhood character strategies.</p> <p>Add: and rural areas, and to include trees on Council land.</p>		

* See definition of gross disproportion in the QTRA

4. Responsible Governance and Community Leadership

“To facilitate the best possible outcomes for our community, by demonstrating strong leadership and working actively to achieve the community’s objectives”

Actions Pertaining to “Responsible Governance and Community Leadership” Objective

A priority action should be to allow easier and more **flexible access** to community engagement. Easier for residents. The “participate” process is slowly getting more and more difficult to input anything meaningful – it just allows you to prioritise actions that are already being planned. It feels very curated. There didn’t seem to be an option to submit items from community groups. No written inputs appear to have been considered in the formation of the Draft Council Plan or Budget), This is 100% goes against your own priority action below. This statement is meaningless without any actions:

*4b) Through an updated Communications Strategy: •Build community understanding of Council roles, services and decision-making •Create **meaningful engagement opportunities** that build trust, reflect community priorities, and support active participation in Council decisions •Provide updates that show how community engagement has been considered in decision making, to ensure engagement processes remain transparent and meaningful.*

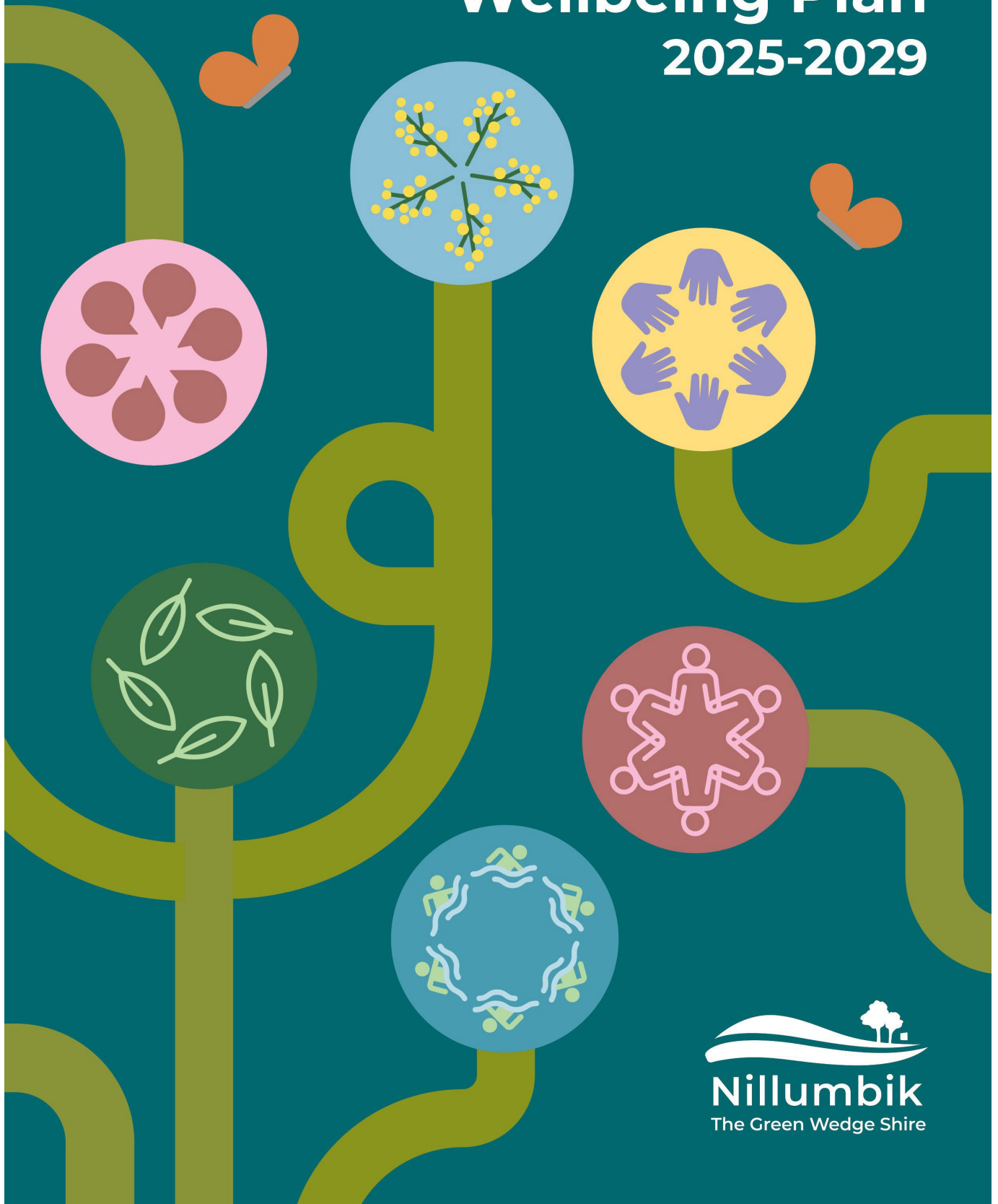
Thank you for the opportunity to feedback on the Draft Plan and we look forward to an update that shows how our community engagement has been considered in decision making on this subject.

Regards,

 for Road and Roadside Ecology (RARE)

July 2025

Draft Nillumbik Health and Wellbeing Plan 2025-2029



Acknowledgement of Country

Nillumbik Shire Council respectfully acknowledges the Wurundjeri Woi-wurrung people as the Traditional Owners of the Country on which Nillumbik is located, and we value the significance of the Wurundjeri people's history as essential to the unique character of the Shire. We pay tribute to all First Nations People living in Nillumbik, give respect to Elders past, present and future, and extend that respect to all First Nations People.

We respect the enduring strength of the Wurundjeri Woi-wurrung and acknowledge the ongoing impacts of past trauma and injustices from colonial invasion, massacres and genocide committed against First Nations People. We acknowledge that sovereignty was never ceded.

Wurundjeri Woi-wurrung people hold a deep and ongoing connection to this place. We value the distinctive place of our First Nations People in both Nillumbik and Australia's identity; from their cultural heritage and care of the land and waterways, to their ongoing contributions in many fields including academia, agriculture, art, economics, law, sport and politics.

For Australian First Nations People, good health is more than the absence of disease or illness; it is a holistic concept that includes physical, social, emotional, cultural and spiritual wellbeing, for both the individual and the community. Culture is also recognised as a strong determinant of health and wellbeing for First Nations People. In line with this, this plan emphasises a holistic approach to health and wellbeing.

Council is committed to Reconciliation and the process of healing.

A journey of acknowledgement, recognition and respect, our commitment to Reconciliation involves:

- celebrating the rich history, cultures and achievements of Australian First Nations People as the oldest continuing cultures on the planet
- addressing the causes of division and misunderstanding between First Nations People and other Australians
- taking responsibility and ownership of past trauma and injustices
- addressing inequities in health, education and justice
- developing a shared, common understanding between First Nations People and other Australians.

Through this plan, Council outlines our commitment to Reconciliation through development of our Reconciliation Action Plan, focus on reducing health inequalities for First Nations People and communities and support for equity and inclusion across Council services, programs and planning.



Inclusion statement

Nillumbik Shire Council is committed to creating a fair, equitable and inclusive community where human rights are respected, participation is facilitated, barriers are addressed, and diversity is celebrated. We support the rights of all people regardless of age, gender, sexuality, ability or cultural identity. We value the diverse and changing nature of our community and understand that some groups and individuals experience more barriers than others.

Alternative formats

For more information or to request a copy of the Nillumbik Health and Wellbeing Plan 2025-2029 in an alternative format or large font, call 9433 3111 or email nillumbik@nillumbik.vic.gov.au

TIS Information:

Council can be contacted through the National Relay Service (NRS). The NRS is available as a phone solution for people who are deaf or have a hearing or speech impairment. All calls are confidential. Users must be registered via www.relayservice.gov.au to make and receive calls:

- TTY users phone 133 677, then ask for Council on 9433 3111.
- Speak and Listen (speech-to-speech) users phone 1300 555 727, then ask for Council on 9433 3111.
- A Hearing loop is located at the Customer Service Counter, Civic Centre, Civic Drive, Greensborough
- Communication boards are available at the Civic Drive Customer Service Counter, Civic Centre, Civic Drive Greensborough.
- Interpreting services are available

Add links here:

- 'Plan on a page'
- 'DAP on a page'
- Easy English version
- Plain text, large font version



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Message from the Council

As your local Councillors, we are proud to present the *Nillumbik Public Health and Wellbeing Plan 2025–2029*. This Plan reflects our shared vision for a thriving, inclusive and resilient community – one where every person has the opportunity for social participation and to be healthy and well as they grow, live, learn, work, play and age.

Local government has a legislated responsibility to protect, improve and promote public health and wellbeing within its municipality. Councils do this by shaping the social, environmental and economic conditions that allow our community to live well and be included. This Plan steps-out how we will achieve this over the next four years.

We are excited to be incorporating the Disability Action Plan and Ageing Well in Nillumbik Plan into this Plan. This innovative change aims to elevate the voices and needs of people with disability, carers and older people, and strengthen impact and efficiency, whilst removing duplication.

Our Nillumbik community enjoys comparatively high levels of health and wellbeing, however there are some areas where health outcomes need to be improved, and some groups and individuals that experience discrimination and disadvantage, resulting in poorer health outcomes. There are also emerging health challenges that need action, including climate change, vaping, cost-of-living increases, and social polarisation. That is why we are committed to embedding health and equity into our decision-making, plans, policies, programs, and infrastructure.

Health and wellbeing are shaped by many factors, influenced by our built and natural surroundings, the fairness of our systems, access to services, and the strength of our social connections. This Plan aims to create and improve these conditions and systems to support good health outcomes for everyone – no matter their age, background, ability, identity or postcode.

This Plan reflects the voices of our community. Through consultation and collaboration, we've listened closely to what matters most – and responded with actions that are place-based, inclusive and comprehensive. We will continue to work closely with community and sector partners to achieve positive change across our six priority areas:

1. Improving mental wellbeing and social connection
2. Preventing discrimination and violence
3. Increasing active living
4. Improving food systems
5. Reducing harm from alcohol, drugs, vaping, tobacco, and gambling
6. Advocating for and improving access to services, facilities and housing

The *Nillumbik Health and Wellbeing Plan 2025-2029* is a cornerstone of Council's strategic direction, complementing the *Council Plan 2025-2029* including the *Community Vision Nillumbik 2040*, and contributing to the goals of the *Victorian Public Health and Wellbeing Plan 2023-2027*. It reflects our strong commitment to the powerful role local government must play in shaping the conditions for a healthy, equitable and connected life for all.

On behalf of Council, we thank every community member and sector partner that shared their voice and ideas. We look forward to working alongside you to foster a Shire where wellbeing is not just a goal – but a reality for all.

Introduction

The Nillumbik Health and Wellbeing Plan 2025-2029 (Plan) outlines priorities and actions to enable people living in our shire to achieve optimum health and wellbeing.

The *Victorian Public Health and Wellbeing Act 2008* recognises the important role local councils play in helping people live healthier, happier lives. Councils have a statutory obligation to develop a Health and Wellbeing Plan within 12 months of each Council election.

Nillumbik Shire Council plays a crucial role in supporting the health and wellbeing of our community through services, advocacy, partnerships and projects. Many of the services council delivers have a direct impact on public health e.g. childhood immunisation, maintaining clean and safe public spaces, food safety, overseeing accommodation standards, wastewater management, enhancing community safety, enforcing smoking and vaping laws, controlling infectious diseases, and planning for emergencies. Many other aspects of council work also have a significant impact on community health by helping to create environments where people can stay healthy, active, and connect with others. These include urban planning, roads and transport, playgrounds and parks, sporting clubs and recreational facilities, children and family services, youth services, and libraries and community, arts, and cultural centres.

Our health and wellbeing vision is:

"A community where everyone has equitable access to the services, infrastructure, environments, and opportunities that support health, wellbeing and inclusion. We work together to remove systematic barriers, build safe, connected and resilient neighbourhoods, ensure local culture promotes health wellbeing and happiness, and foster a shared connection to each other and nature."

The Nillumbik Health and Wellbeing Plan 2025–2029 shares our goals and priorities for supporting the health and wellbeing of our community over the next four years. It also outlines the steps we'll take to help everyone in Nillumbik stay well, connected, and supported.

The Plan is shaped by evidence about our community's health needs and extensive community engagement. It is built on strong partnerships, in recognition that working together with others will amplify positive impacts to health outcomes for our community.

The Health and Wellbeing Advisory Committee agreed that the six priority health and wellbeing areas identified by Council aligned with the work of partners, and the Advisory Committee endorsed these priority areas and approach, as follows:

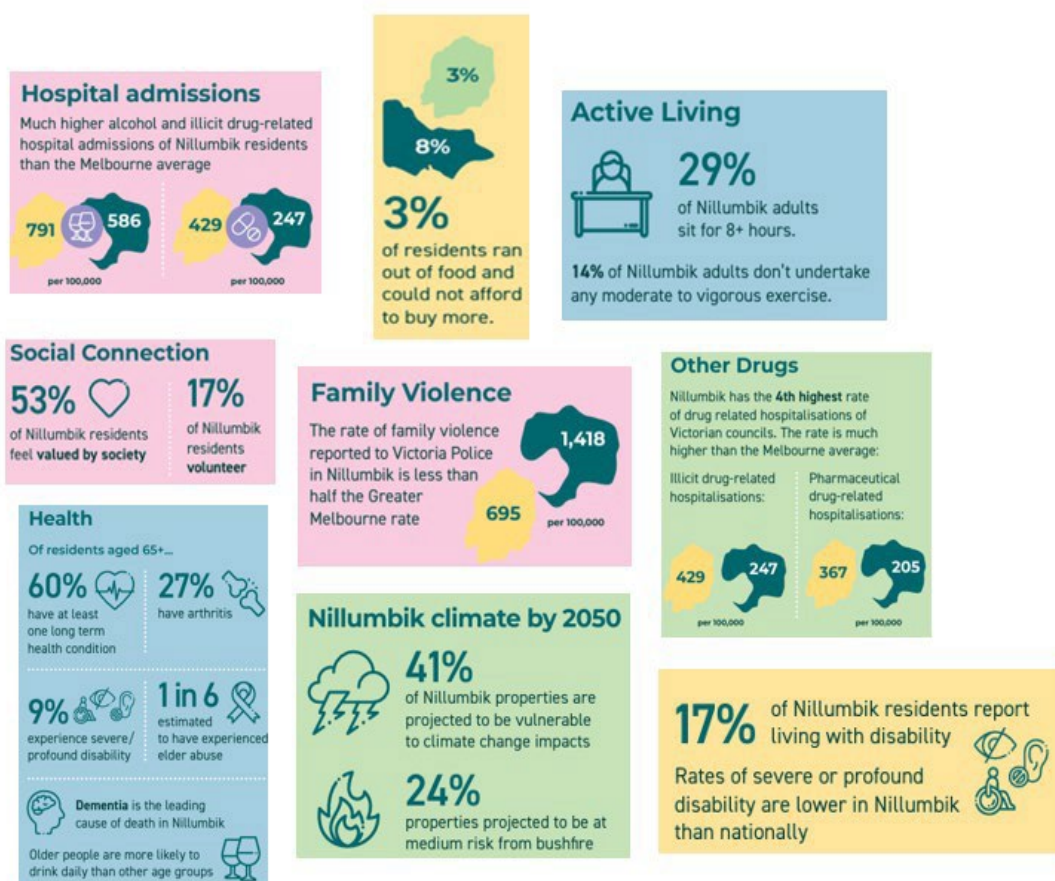
1. Improving mental wellbeing and social connection
2. Preventing discrimination and violence
3. Increasing active living
4. Improving food systems
5. Reducing harm from alcohol, drugs, vaping, tobacco, and gambling
6. Advocating for and improving access to services, facilities and housing

Nillumbik Health and Wellbeing Profile 2025

The Nillumbik Health and Wellbeing Profile 2025 is a research paper that analyses available health and social data and evidence to identify local health status, needs and priorities. The Profile looks at data related to the social and environmental determinants of health, as well as health risks and demographics. An equity lens was applied to identify groups and regions experiencing health inequities.

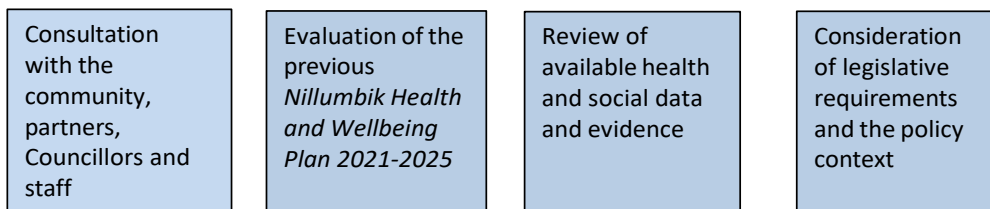
The evidence in the Profile has been used to inform the *Nillumbik Health and Wellbeing Plan 2025-2029* and other strategic plans.

Health and Wellbeing Snapshots and Factsheets have been developed to provide shorter summaries of the key findings. These are grouped by health priority area or priority population. A plain-text, large font version is also available. All of these documents are available to the general public on Council's website at [Health and Wellbeing Plan - Nillumbik Shire Council](#).



Development of the Plan

This Plan was developed in line with legislative requirements under the *Public Health and Wellbeing Act 2008* over a period of 12-months. The main components were:



Community Engagement Snapshot

Listening to the community and partners and embedding local voices and experiences into the Plan is essential to ensuring local priorities and needs are addressed, and that strategies and actions are appropriate, effective, relevant and sustainable within the Nillumbik context.

An integrated community engagement approach was designed to gather community insights. This included 3 phases throughout the Plan's development. The approach focused on reaching individuals and groups representing the diversity of our community, across all areas of the Shire. Council's Advisory committees, local agencies and service providers were also included in the engagement. As this Plan incorporates the Disability Action Plan, it was important that we also included questions and discussion regarding the health and wellbeing of those living with a disability.

Below is a snapshot of the community engagement reach:

- 601 survey respondents
- 560+ people reached at pop-ups in Eltham, Diamond Creek and Hurstbridge
- 450+ people reached through Phase 2 activities
- 59 attendees at the Health and Wellbeing Partnership Forum
- 98 attendees at the Health and Wellbeing Profile Workshop
- 5 Advisory Committees consulted throughout
- X submissions received on the draft Plan
- Consultation with Wurundjeri Woi-wurrung Traditional Owners

Phase 1 – General Engagement

In February 2025, Council undertook a broad community survey, *Nillumbik Now and Beyond* to identify what is important to the community and inform high-level priority areas for Council. Community Engagement activities included a survey and pop-ups.

Phase 2 – Targeted Engagement

In March and April 2025, Council conducted a number of outreach community engagement activities. The Phase 2 activities included focus groups, drop-in sessions, and outreach with community groups, local services, community centres and schools. These activities aimed to target priority populations who may have been missed in the online survey in Phase 1.

Phase 3 – Public Exhibition of the draft Plan

In June and July 2025, the draft Plan was made available for public comment through the Participate Nillumbik online platform and at a Planning and Consultation Committee meeting on Insert date

The extensive engagement process revealed that top 10 most important health and wellbeing issues for our community are:

- Access to transport
- Access to education
- Access to housing
- Healthy, affordable, and sustainable food
- Preventing family violence
- Mental health
- Increasing active living
- Preventing elder abuse
- Promoting social inclusion, reducing isolation
- Prevention of physical, chronic health conditions

These have directly informed the development of Council's Health and Wellbeing priorities.

Evaluation of the Health and Wellbeing Plan 2021-2025

Review and evaluation of the earlier Nillumbik Health and Wellbeing Plan 2021-2025 informed the development of this new Plan. The assistance of the Health and Wellbeing Advisory Committee was deeply appreciated in this review. The review considered what worked well and could be expanded, learnings and challenges, and opportunities for improvement and elevation.

Legislative and Strategic Alignment

Strategic Alignment

Under the Public Health and Wellbeing Act 2008, a Municipal Public Health and Wellbeing Plan must be consistent with the Council Plan and Municipal Planning Strategy.

The Local Government Act 2020 promotes an integrated approach to strategic planning and reporting which seeks to ensure strong alignment between strategic documents and policies that direct and influence initiatives, activities and projects undertaken by Council.

Council's Strategic Framework describes how we will achieve our community's aspirations. It outlines the relationship between strategies and plans and how we resource, implement, monitor and review action.

Strategic planning framework

Authorisation	Legislation and regulation	
Aspiration	Community Vision – Nillumbik 2040	
Position	Access, Equity and Inclusion Policy	Community Engagement Policy
	Complaints Handling Policy	Information Privacy Policy
Strategic Planning	Annual Budget	Asset Plan
	Council Plan	Financial Plan
	Municipal Planning Strategy	Revenue and Rating Plan
	Nillumbik Health and Wellbeing Plan (incorporating the Disability Action Plan and Ageing Well Plan)	
Strategies and plans	Inclusive living and participation	Sustainable futures and healthy environments
	Early Years Infrastructure Plan Gender Equality Action Plan Reflect Reconciliation Action Plan	Climate Action Plan Integrated Water Management Plan Onsite Wastewater Management Plan Roadside Management Plan Urban Tree Canopy Strategy
	Liveable and connected communities	Responsible governance and community leadership
	Biodiversity Strategy Diamond Creek Major Activity Centre Structure Plan Economic Development Strategy Eltham Major Activity Centre Structure Plan Equine in Nillumbik Green Wedge Management Plan Housing Strategy Integrated Transport Strategy Neighbourhood Character Strategy Open Space Strategy Recreation and Leisure Strategy Road Management Plan	Advocacy Plan Communication Strategy Domestic Animal Management Plan Municipal Emergency Management Plan* Municipal Fire Management Plan* Municipal Relief and Recovery Plan* Municipal Storm and Flood Emergency Management Plan*
Action and implementation	Action and implementation plans	
	Department business plans	
	Nillumbik Planning Scheme	

* Denotes a multi-agency plan

Community Vision

The *Community Vision – Nillumbik 2040* represents the shared aspirations of our community. Developed in partnership with the community, and subsequently adopted by Council in October 2021, the Vision guides Council's long-term planning and decision-making, ensuring we stay focused on the things that truly matter. *Community Vision – Nillumbik 2040* is an aspirational description of what our community values and wants for the future. It contains vision statements that align to feedback received from over 2,000 community participants.

This Plan is considerate of this vision and responds directly to the aspirations of our community in Nillumbik.

Council Plan

The Council Plan 2025-2029 is Council's commitment to delivering on the community's aspirations outlined in *Community Vision – Nillumbik 2040* over the next four years. It will guide the organisation's work to deliver on the priorities of Council and the community, and to manage and deliver services for the Nillumbik community during Council's term. Our Council Plan 2025-2029 is divided into the following 4 Key Themes which align closely to the community vision:



Municipal Planning Strategy

Health and wellbeing in Nillumbik are strongly influenced by the built and natural environment. The Municipal Planning Strategy provides an overview of important local planning issues, sets out the vision for future use and development in the municipality and establishes strategic directions about how the municipality is expected to change through the implementation of planning policy and the planning scheme. Many objectives of the Municipal Planning Strategy support the priorities of the Health and Wellbeing Plan and address matters such as:

- Accessible buildings for the provision of social, health, cultural and education services
- Climate preparedness and protection of natural landscapes
- Resilience against natural emergency events
- Efficient and safe walking, cycling and transport networks
- Protection and provision of open space
- Housing provision and diversification of housing options

The Victorian Public Health and Wellbeing Plan 2023-2027

The *Victorian Public Health and Wellbeing Act 2008* recognises the important role local councils play in helping people live healthier, happier lives. The Act requires councils to create a health and wellbeing plan within 12 months of each council election. The Plan must be evidence-based, involve the local community, and be delivered in partnership. Fundamental to this context, is alignment with the *Victorian Public Health and Wellbeing Plan 2023-2027* and its priorities. In addition, over 25 strategic plans and policies covering

health priority areas and priority populations at the national, state and regional level have been reviewed and have been considered in the development of this Plan.

The Nillumbik Municipal Public Health and Wellbeing Plan must have regard to the Victorian Public Health and Wellbeing Plan 2023-2027, which sets the direction and provides a framework for coordinated action, with the aim of delivering improved public health and wellbeing outcomes for Victorians. The table below outlines the 10 priority areas in the State Plan and demonstrates clear alignment with the 6 priority areas of this Plan.

Nillumbik Health and wellbeing priorities →	Improving mental wellbeing and social connection	Preventing discrimination and violence	Increasing active living	Improving food systems	Reducing harm from alcohol, drugs, vaping, tobacco and gambling	Advocating for and improving access to services, facilities and housing
Victorian Public Health Priorities ↓						
Improving sexual and reproductive health						
Reducing harm from tobacco and e-cigarette use					☑	
Improving wellbeing	☑					
Increasing healthy eating				☑		
Increasing active living			☑			☑
Reducing harm from alcohol and drug use					☑	
Tackling climate change and its impacts on health	☑		☑	☑		☑
Preventing all forms of violence		☑				
Decreasing antimicrobial resistance across human and animal health						
Reducing injury			☑			☑

Measures to reduce family and gender-based violence

It is a requirement of the Public Health and Wellbeing Act 2008 that Council specifies measures to prevent family violence and respond to the needs of victims of family violence in the local community within its health and wellbeing plan. Our approach is aligned with the Women's Health in the North "[Building a Respectful Community Partnership 2022-2026](#)" and Council's Gender Equality Action Plan.

Men's violence against women encompasses all forms of violence experienced by women because of their gender, perpetrated by men. This includes physical, sexual, emotional, financial and cultural violence, as well as a wide range of controlling and coercive

behaviours. This violence has serious and long-lasting effects on the health and wellbeing of women, especially related to mental health and sexual and reproductive health.

Family violence also includes abuse experienced by older people, children, gender-diverse people and the LGBTIQ+ community. The effects of family violence are disproportionately experienced by women and children.

Strategies in this plan form part of Council's approach to respond to and reduce family violence in the Nillumbik community, and support victim survivors. Everyone in our community has a role to play in reducing and eliminating gender-based violence and family violence.

Progressing gender equality

Nillumbik Shire Council recognises the important role that local government plays in promoting gender equality and preventing gender-based violence. Council aligns its gender equality work to regional, state, national and international research, strategies and frameworks which determine that addressing the drivers of gender inequality reduces violence against women, and gender-based violence.

The Gender Equality Act 2020 commenced on 31 March 2021 and seeks to improve workplace gender equality in the Victorian public sector, universities and local councils. Local councils are required to promote gender equality in the workplace and in policies, programs and services that have a direct and significant impact on the community.

'Preventing discrimination and violence' has been highlighted as a priority area with specific strategies responding to Family Violence, Elder Abuse and gender equality. A gender lens has been applied across all priorities and strategies in this Plan, and Equity Impact Assessments will continue to be undertaken for actions and projects throughout the implementation of this Plan.

Considerations of climate change impacts on health

The Climate Change Act 2017 requires councils to consider climate change when preparing their Health and Wellbeing Plan. Councils are ideally positioned to take action to help mitigate and adapt to climate change and its impacts on health at the local level.

There are many ways climate change impacts health. Here in Nillumbik, this may include:

- Heat-related illnesses and deaths
- Poor air quality
- Increased spread of infectious diseases
- Food and water insecurity
- Mental health impacts
- Injury and trauma from extreme weather events
- Displacement and loss of housing
- Strain on health systems
- Exacerbation of existing inequalities
- Reduced access to green space and physical activity

This Plan complements work being undertaken through the Nillumbik Climate Action Plan. The Climate Action Plan includes mitigation and adaptation strategies that will seek to deliver health co-benefits for our community in the areas of:

- Climate action leadership and culture
- Having a climate-resilient, adaptive and safe community
- Having a climate-resilient natural environment
- Having climate-responsive Council services, facilities and infrastructure
- Reducing Council and community energy-use emissions
- Enhancing sustainable transport
- Achieving a zero-waste and circular economy.

Incorporating the Disability Action Plan

Nillumbik Shire Council is committed to building a community that is inclusive and accessible to everyone. We want all people, regardless of ability, to take part in community life. This includes access to our buildings, services, programs, information, communication, and employment opportunities.

Council is incorporating the Disability Action Plan into the Health and Wellbeing Plan 2025-2029. There is strong alignment between these Plans and they both have similar legislative requirements. This innovative change aims to elevate the voices and needs of people with disability and carers, and strengthen impact and efficiency, whilst removing duplication. People with disability and carers have been consulted and engaged throughout the development of the Health and Wellbeing Plan to ensure their lived experience, needs, ideas and feedback has been embedded throughout the Plan.

Based on national data from the 2022 Survey of Disability, Ageing and Carers, approximately 21.4% of Australians have a disability. According to the 2021 Census this suggests that around 13,464 residents may have some form of disability. The [Disability Factsheet 2025](#) provides more information and data.

The definition of disability in the Disability Discrimination Act 1992 (DDA) includes:

- Physical
- Intellectual
- Psychiatric
- Neurological
- Cognitive or sensory (e.g. hearing or vision impairment)
- Learning difficulties
- Physical disfigurement
- Immunological (e.g. disease-causing organisms)

Disability inclusion is about fairness, respect, and equal opportunity. It means removing barriers so people with disability can fully participate. These changes also help others—like older adults, carers, parents with prams, or people with short-term injuries or health conditions.

We recognise that people with disability may face other forms of discrimination. This could be due to their age, cultural background, gender identity, sexual orientation, or if they are from First Nations or refugee communities. We aim to take a broader, more inclusive approach that considers all aspects of a person's identity.

The disability inclusion measures in this Plan help Council meet its responsibilities under the:

- *Victorian Disability Act 2006*
- *Disability Discrimination Act 1992 (DDA)*
- *Charter of Human Rights and Responsibilities Act 2006*
- *United Nations Convention on the Rights of Persons with Disabilities 2006*
- *Equal Opportunity Act 2010*

Council's priorities for disability inclusion are based on the four key goals in the Victorian Disability Act 2006:

- Reducing barriers to people with disability accessing Council goods, services and facilities
- Reducing barriers to people with disability obtaining and maintaining employment
- Promoting inclusion and participation in the community
- Achieving tangible changes in attitudes and practices that discriminate against people with disability

With the incorporation of the Disability Action Plan into this Plan, the Plan must also respond to the four disability goal areas in the Disability Act 2006. The table below demonstrates how the disability goal areas have been incorporated and embedded into the priority areas in this Plan.

Nillumbik Health and Wellbeing priorities →	Improving mental wellbeing and social connection	Preventing discrimination and violence	Increasing active living	Improving food systems	Reducing harm from alcohol, drugs, vaping, tobacco and gambling	Advocating for and improving access to services, facilities and housing
Victorian Disability Act Goals ↓						
Reducing barriers to people with disability accessing Council goods, services and facilities	✓		✓	✓		✓
Reducing barriers to people with disability obtaining and maintaining employment		✓				
Improving wellbeing by promoting inclusion and participation in the community		✓	✓	✓		✓
Achieving tangible changes in attitudes and practices that discriminate against people with disability	✓	✓				✓

Working in Partnership

The health, social and equity issues and needs of our community are complex. A whole-of-community approach is therefore needed to protect, promote and improve health and wellbeing. As such, partnerships and collaboration play an integral role in the development, implementation, and evaluation of this Plan.

Partnership within this Plan takes many forms, including:

- Collaborating on project development and delivery
- Resource sharing such as venues, training and staff time
- Shared communications, promotion, information and referrals
- Submitting shared grant applications
- Joint advocacy submissions
- Governance (e.g. Advisory Committees)
- Networks and working groups

An annual Health and Wellbeing Partnership Forum will be held to share local health information and knowledge, inform each Annual Action Plan, build relationships, and to develop and commit to collaboration projects and actions. Local organisations, services and community groups whose work aligns with the priority areas and/or priority populations in this Plan, will be invited to participate.

We are committed to working collaboratively with community and partners to deliver this Plan. We thank the many individuals and groups, organisations and agencies who have shared their ideas, experiences and expertise to shape the Nillumbik Health and Wellbeing Plan. We look forward to partnering and working together over the next 4 years, to create effective and sustainable change that meets local needs and improves local lives.

Access, Equity and Inclusion

Council's commitment to equity is detailed in the Access, Equity and Inclusion Policy. This important approach is embedded within everything Council does, including this Plan. The Access, Equity and Inclusion Policy has identified the following priority populations in Nillumbik:

- Carers
- Children and young people
- Cultural and linguistically diverse people
- First Nations People
- LGBTIQ+ communities
- Gender diverse people
- Older people
- People experiencing financial insecurity
- People who live rurally or are geographically isolated
- People with a disability, chronic disease and/or mental illness
- Refugees and people seeking asylum
- Women and girls

In developing this Plan, we have ensured that the voices of priority populations are heard and that their current and future needs are addressed.



Social Determinants of Health



Source: [Social Determinants of Health | NACCHO Aboriginal and Torres Strait Islander Health News](#)

The Social Determinants of Health (SDoH) describe the interconnected factors that shape our health. They show that health is influenced not only by genetics or personal choices, but also by social inclusion, access to education, employment, public services, legal rights, and the political environment. These determinants can be protective—like having a job—but may also pose risks, such as unsafe working conditions. This Plan is grounded in a strong understanding of the SDoH and their impact on health and wellbeing.

PRIORITY 1 - Improving mental wellbeing and social connection

Mental wellbeing and social connection are essential to living a healthy, fulfilling life. When people feel mentally well, they are better able to manage stress, build positive relationships, and participate fully in their communities. Just as important is the sense of connection we feel with others—whether through family, friends, neighbours, or community groups. Feeling connected gives us a sense of belonging and support, which can protect against loneliness, anxiety, and depression. Together, mental wellbeing and strong social connection help people thrive, contributing to healthier, more resilient communities where everyone has the opportunity to feel safe, valued, and supported.

Objective: A connected and resilient community that promotes and protects mental wellbeing, where everyone feels a sense of belonging and has the relationships they need to participate in society and live a healthy and happy life.

Indicators and targets:



Decrease in proportion of people who feel lonely.
In Nillumbik, 21% of residents report feeling lonely (1)



Decrease in rate of psychological distress
In Nillumbik, 16% of adults report high or very high psychological distress (2)



Decrease in number of adults who sought help for a mental health problem
In Nillumbik, 20.9% of adults sought professional help for a mental health problem

Strategies:

- Deliver and partner on a range of social connection programs across the Shire, ensuring and promoting inclusion and accessibility
- Support opportunities for unstructured social connection and sense of belonging in town centres and spaces, through arts and cultural activities and place-activation
- Provide a range of accessible and inclusive volunteering opportunities at Council that respond to declines since covid
- Promote help-seeking and reduce stigma regarding mental ill-health
- Build resilience of the community to respond to emergencies that have a health impact

Council Plan Strategy Alignment

Our people - Welcoming and inclusive communities
Our people - Health, equity and community connection
Our people - Community empowerment and participation
Our future – Local climate action
Our Council – Responsive and efficient services

(1) 2023 Victorian Population Health Survey, unpublished.

(2) Source : Population Profile of the NEPHU Catchment Area 2025. All statistics under the Health and Wellbeing Priorities section are sourced from this document unless otherwise stated.



PRIORITY 2 – Preventing discrimination and violence

Everyone deserves to live in a community where they feel safe, respected, and included. Discrimination and violence—especially violence against women—have serious and lasting impacts on health and wellbeing. They can lead to physical injury, mental health challenges such as anxiety and depression, and a loss of trust in the places and people that should offer support. Discrimination, whether based on gender, race, disability, sexuality, or other factors, can limit access to opportunities and services, and contribute to social isolation. Preventing violence and discrimination is not just about safety—it's about creating a healthier, fairer community where everyone has the chance to thrive.

Objective: A community where discrimination and violence against marginalised groups are actively prevented through inclusive policies, safe and accessible public spaces, equitable support services, and education and a local culture that promotes respect, safety, and belonging for everyone.

Indicators and targets:



Decrease in rates of incidence of family violence
In Nillumbik, there are over 400 incidents per year and the figure is growing (3)



Decrease in rates of incidents of elder abuse
In Nillumbik, 1 in 6 older people have experienced elder abuse (4)



Decrease in percentage of people reporting having experienced discrimination in the last 12 months
In Nillumbik, 12.4% of people have experienced discrimination in the last 12 months



Increase in income for women
In Nillumbik, 24% of women earn under \$500 per week

Strategies

- Promote gender equality in Council's policies, programs and services and address the gendered drivers of violence.
- Proactively work towards preventing family violence in the local community.
- Proactively work towards preventing elder abuse in the local community.
- Achieve tangible changes in attitudes and practices which discriminate against persons with a disability.
- Prevent discrimination and increase LGBTIQ+ inclusion and participation through leadership and Council policies, plans and programs.
- Prevent discrimination and increase inclusion and participation of culturally diverse communities through leadership and Council policies, plans and programs.
- Take tangible steps to advance reconciliation, truth-telling and local knowledge of First Nations peoples, cultures and histories.
- Promote social cohesion and reduce polarisation in the community through leadership and supporting community-led activities.
- Remove barriers to employment for people with disability

Council Plan Strategy Alignment

Our people - Welcoming and inclusive communities
Our people - Health, equity and community connection
Our people - Community empowerment and participation

(3) AIHW, <https://www.aihw.gov.au/family-domestic-and-sexual-violence/resources/fdsv-summary>
(4) Qu, L., Kaspiw, R., Carson, R., Roopani, D., De Maio, J., Harvey, J., Horsfall, B. (2021). National Elder Abuse Prevalence Study: Final Report. (Research Report). Melbourne: Australian Institute of Family Studies.

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PRIORITY 3 – Increasing Active Living

Active living plays a vital role in supporting the health and wellbeing of our local community by encouraging people of all ages and abilities to move more, connect with others, and enjoy the spaces around them. Nillumbik offers a unique blend of natural landscapes, vibrant townships, and strong community spirit which create the perfect environment for movement and connection. When individuals engage in regular physical activity—whether it's walking to the shops, playing in the park, or joining a local sports group—they not only improve their physical health but also boost their mental wellbeing and sense of belonging. A community that embraces active living is one where people feel safer, more connected, and more empowered to lead healthier lives. By making it easier and more enjoyable to be active every day, we help build a stronger, more resilient community for everyone.

Objective: An active community where physical infrastructure and an inclusive culture supports people of all ages and abilities to move more every day.

Indicators and targets:



Increase in proportion of adults undertaking sufficient physical activity
In Nillumbik, 51% of people do less than the recommended 150 minutes of physical activity per week



Decrease in proportion of the population who are sedentary
In Nillumbik, 29% of adults sit for more than 8 hours per day



Increase in proximity to local park
In Nillumbik, 84% of residents live within 400m of a park or open space (5)



Decrease in obesity rates
In Nillumbik, 57.3% of adults self-report their BMI as indicating they are overweight or obese

Strategies:

- Remove barriers for participation in sport and recreation for women and girls, people with disability, LGBTIQ+ people, people from culturally diverse backgrounds, and First Nations People.
- Increase active living among older people and people with disability to promote health, prevent falls and support recovery.
- Provide opportunities for people living rurally to engage in sports and recreation activities
- Increase safety and accessibility for active transport
- Encourage active and non-structured recreation in the natural environment, parks, open spaces and trails

Council Plan Strategy Alignment

Our people - Health, equity and community connection
Our place – Vibrant, safe and liveable activity centres and neighbourhoods
Our place – Open spaces and active places
Our Council – Strengthen advocacy

(5) Nillumbik Community Profile 2025 <https://www.nillumbik.vic.gov.au/files/assets/public/v/1/community/health/profile-nillumbik-community-health-and-wellbeing-profile-january-2025-final.pdf>



PRIORITY 4 - Improving food systems

A strong, equitable food system is essential for the health and wellbeing of our community. When people have reliable access to affordable, nutritious food, they are better able to thrive—physically, mentally, and socially. In Nillumbik, improving food systems means not only increasing access to healthy food options but also empowering communities to take part in local solutions, such as food share programs, community gardens, and farmers' markets. These initiatives help reduce food insecurity, foster social connection, and support local producers, creating a more resilient and sustainable food future for everyone.

Objective: A healthy, sustainable, and equitable food system where everyone has access to affordable, nutritious food, local food production is supported, and community connections are strengthened through shared food experiences.

Indicators and targets:



Increase in proportion of adults who meet fruit consumption guidelines
In Nillumbik 41% of adults meet fruit consumption guidelines



Increase in proportion of adults who meet vegetable consumption guidelines
In Nillumbik, 8.4% of adults meet vegetable consumption guidelines



Decrease in proportion of people reporting food insecurity
In Nillumbik, 17.2% of the population has worried about food insecurity in a 12-month period

Strategies

- Respond to increasing food insecurity
- Strengthen and facilitate connections and participation across the community food network
- Work towards developing and securing funding for a Food Systems Strategy
- Create a food environment that promotes access to nutritious, sustainable and inclusive food and drink and minimises access to ultra-processed food and drink
- Provide opportunities for the community to develop skills and connection to food growing and cooking
- Enhance sustainability and reduce the carbon-footprint of the local food system

Council Plan Strategy Alignment

Our people - Health, equity and community connection
Our future - Future planning and sustainable development



PRIORITY 5 - Reducing harm from alcohol, drugs, vaping, tobacco, and gambling

Reducing harm from alcohol, drugs, vaping, tobacco, and gambling is vital to protecting the health, safety, and wellbeing of our community. These issues can have far-reaching impacts—not only on individuals, but also on families, workplaces, and the broader social fabric. In Nillumbik, we are committed to creating environments that support informed choices, reduce stigma, and provide access to early intervention and support services. By working together with local partners, schools, and community groups, we can help prevent harm, promote healthier lifestyles, and ensure that everyone has the opportunity to live a safe, connected, and fulfilling life.

Objective: A community where harm from alcohol, drugs, tobacco, vaping, and gambling is minimised through supportive environments, effective regulation, and community-wide approaches that prioritise health, equity, and prevention.

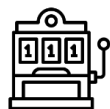
Indicators and Targets:



Decrease in proportion of adults who smoke and/or vape daily
In Nillumbik, 18% of the population smokes or vapes daily



Increase in proportion of adults who consume alcohol within NHMRC guidelines
In Nillumbik, 72% of adults consume alcohol within accepted guidelines



Decrease in expenditure on gaming machines
In Nillumbik, there is a \$190 per adult daily spend across 2 venues ⁽⁶⁾

Strategies

- Foster a positive alcohol culture in Nillumbik
- Investigate drug use in Nillumbik to identify and respond to local needs
- Expand smoke-free and vape-free environments
- Elevate youth voices and partner with services and schools to address vaping among young people
- Minimise gambling capability in Nillumbik
- Partner with sports clubs, services and schools to address online gambling, especially among young people and men.

Council Plan Strategy Alignment

Our people - Health, equity and community connection
Our Council – Responsive and efficient services

(6) Victorian Gambling and Casino Control Commission,
<https://www.vgccc.vic.gov.au/files/yearlydensitystatisticalreleasenov24xlsx>

PRIORITY 6 - Advocating for and improving access to services, facilities and housing

Council plays a vital role in supporting the health and wellbeing of our community by advocating for fair and inclusive access to essential services. We work to ensure that everyone—regardless of age, ability, or background—can participate fully in community life. This includes promoting inclusive practices among local businesses and groups, making our communications and customer services more accessible, and embedding sustainability and climate resilience into our projects. We work closely with residents, service providers, and other levels of government to identify local needs and remove barriers to access. Through thoughtful planning, partnerships, and community engagement, we aim to make Nillumbik a healthier, more connected, and resilient community where everyone has the opportunity to thrive.

Objective: A liveable and inclusive community where everyone has equitable access to essential services, accessible infrastructure, and appropriate and affordable housing that supports health and wellbeing across all life stages.

Indicators and targets:



Increase in the proportion of rental properties affordable for low-income workers
In Nillumbik, 3.7% of rental properties are affordable for low-income workers (7)



Decrease in levels of homelessness
In Nillumbik, there are approximately 90 people experiencing homelessness



Increase access to health services
In Nillumbik, there is one General Practice facility for every 5700 residents (8)



Increase in level of kindergarten enrolment
In Nillumbik, 93% of eligible children are enrolled in kindergarten

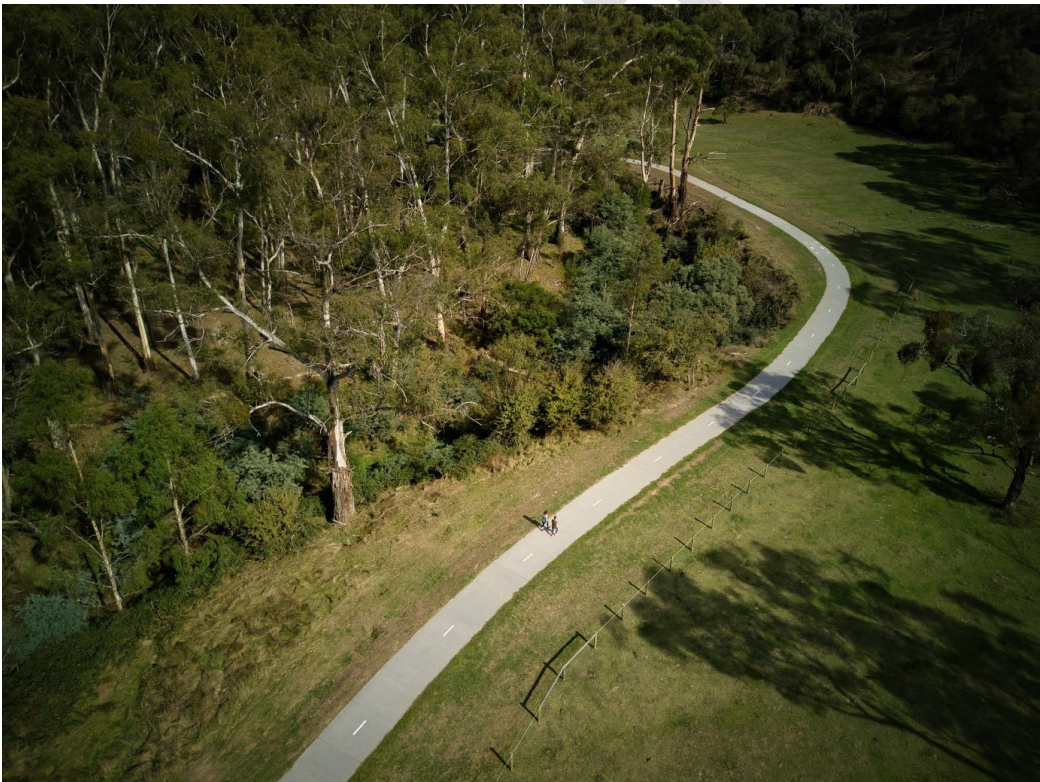
Strategies

- Improve access to and inclusion in Council services, facilities and infrastructure
- Promote to local businesses and community groups approaches and programs that support inclusion for people with a disability
- Ensure Council communications and customer services are accessible and inclusive
- Ensure sustainability and climate adaptation is embedded into infrastructure and capital works projects
- Advocate for increased public transport in rural areas
- Advocate for improved access to local healthcare, ageing and disability services

Council Plan Strategy Alignment

Our people – Welcoming and inclusive communities
Our people - Health, equity and community connection
Our place – Vibrant, safe and liveable activity centres and neighbourhoods
Our place – Rural character and communities
Our future - Future planning and sustainable development
Our Council – Strengthening advocacy
Our Council – Responsive and efficient services

(7) <https://www.nillumbik.vic.gov.au/files/assets/public/v/1/community/health/profile-nillumbik-community-health-and-wellbeing-profile-january-2025-final.pdf>
(8)Eastern Melbourne Primary Health Network, Local government area summaries 2021, https://emphn.org.au/wp-content/uploads/2024/08/HNA-LGA-Summaries-2021_final-report.pdf



Monitoring and evaluation

Governance

Council engages with the community, partners, and key stakeholders through a range of advisory committees, which serve as vital channels for consultation and collaboration.

The Health and Wellbeing Advisory Committee plays a central role in guiding this Plan. As a collaborative governance body, its members contribute knowledge, expertise, and strategic advice, while also supporting the planning, implementation, and oversight of initiatives that promote positive health and wellbeing outcomes across Nillumbik.

In addition to this Committee, Council will seek input from the following advisory groups to inform the development of each Annual Action Plan, as well as relevant actions, projects, and policies:

- Inclusion and Access Advisory Committee
- Positive Ageing Advisory Committee
- Youth Council
- Environment and Sustainability Advisory Committee

Implementation

A detailed set of actions to support the implementation of the strategies in this Plan will be collaboratively developed annually across Council in response to local data, community engagement, and Councillor feedback. These actions will guide the implementation of the Health and Wellbeing Plan over its four-year lifespan.

These annually developed action plans will detail:

- The actions to be delivered
- Timeframes for delivery
- Responsible Council teams
- Partner organisations involved

The development and review of these annual plans will be undertaken in partnership with the Health and Wellbeing Advisory Committee, other relevant advisory committees, and through the Health and Wellbeing Partnership Forum. Both the Annual Action Plans and accompanying progress reports will be published on Council's website to ensure transparency and accountability.

Monitoring and evaluation

Councils are required under the Public Health and Wellbeing Act 2008 to review and, if needed, update their Health and Wellbeing Plan annually. This includes monitoring actions to prevent family violence and support victims, in line with the Act.

Annual progress reports will track achievements across priority areas, highlight key initiatives through case studies, identify improvement opportunities, and guide the next year's action plan.

Each of the priority areas of the Plan includes a sample of indicators of the health status of our Nillumbik community. It is often the case that improvements in health and wellbeing are long term and often the result of collaborative cumulative effort over time. Our monitoring of

this Plan will include a report on the trajectory of movement in these indicators in the final evaluation to be conducted prior to this Plan's expiry in 2029.



Glossary

Access, Equity and Inclusion

A policy approach that ensures all individuals, regardless of background or ability, can participate fully in community life by removing barriers and promoting fairness.

Disability Action Plan (DAP)

A strategic plan that outlines actions to reduce barriers and promote inclusion for people with disabilities.

Equity Impact Assessment (EIA)

A tool used to assess how policies, programs, or projects may affect different population groups, particularly those experiencing disadvantage.

Health and Wellbeing Advisory Committee

A governance group that provides strategic advice and oversight for the implementation of the Health and Wellbeing Plan.

NEPHU North Eastern Public Health Unit

NEPHU one of nine Local Public Health Units (LPHUs) across Victoria, funded by the Victorian Government and hosted by Austin Health. NEPHU serves the northern and north-eastern metropolitan region of Melbourne, including areas like Nillumbik, Whittlesea, Hume, and the Yarra Ranges, covering a population of over 1.8 million people across 12 local government areas.

Priority Populations

Groups identified as experiencing greater barriers to health and wellbeing, such as people with disabilities, First Nations People, LGBTIQ+ communities, and those experiencing financial insecurity.

Social Determinants of Health (SDoH)

The conditions in which people are born, grow, live, work, and age that influence health outcomes, such as education, income, housing, and social inclusion.

Appendices

1. Nillumbik Community Health and Wellbeing Profile 2025

Nillumbik Shire Council

Civic Drive (PO Box 476) Greensborough Victoria 3088
9433 3111 | nillumbik@nillumbik.vic.gov.au



nillumbik.vic.gov.au

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Summary of submissions to Draft Nillumbik Health and Wellbeing Plan 2025-2029

Unique ID	Submission	Officer response
1. Rainbow Local Government	Refer to submission 1 below	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We note your comment welcoming the inclusion of LGBTIQ+ communities and gender diverse people as priority populations in the Plan.</p> <p>We note your recommendation to include data from the Snapshot on Priority Populations, including LGBTIQ+ people, in the Health and Wellbeing Profile 2025 section. This section is focused on health outcomes data, rather than demographic groupings. We recognise the importance of addressing the needs of priority groups across the broader plan.</p> <p>We note your observations regarding existing Council strategies and advisory committees and your recommendation to include the following two strategies under Priority 2:</p> <ul style="list-style-type: none"> - Initiate a Gender Equality and LGBTIQ+ Advisory Committee - Develop an LGBTIQ+ Action Plan <p>We also acknowledge the request that terms of reference be prepared within a reasonable timeframe for an advisory committee. As per Council resolution 25 March 2025, the request to establish an LGBTIQ+ Advisory Committee is under review. Your feedback will be considered as part of this process.</p> <p>We note your recommendation to develop an LGBTIQ+ factsheet for Council's Health and Wellbeing Plan webpage. This feedback will be considered as part of the ongoing review.</p> <p>We acknowledge your comment regarding the absence of an indicator for the strategy to remove barriers to participation in sport and recreation for women and girls, people with disability, LGBTIQ+ people, people from culturally diverse backgrounds, and First Nations people. We also note your suggested indicator referencing increased participation across these groups, aligned with Council's Fair Access Policy.</p> <p>While this intent is strongly supported, comprehensive data that captures participation across all these population groups is currently limited. Council will continue to explore opportunities to improve data collection through partnerships with local clubs, state sporting bodies and other agencies. In the meantime, we will consider proxy measures or qualitative reporting to help track progress in delivering more inclusive and equitable access to sport and recreation.</p> <p>We are pleased to hear that you welcome the inclusion of a statement in the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029 that "family violence also includes abuse experienced by... the LGBTIQ+ community."</p>
2. Eltham Community Action group	Refer to submission 2 below	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We acknowledge your comments regarding the readability of the Plan and the need for clearer articulation of practical outcomes, as well as the structure and sequencing of the Plan. We understand that complex documents can be challenging to navigate and will take this feedback into consideration when refining the language and presentation of key actions and outcomes. Our aim is to ensure the Plan is both accessible and meaningful to the broader community. We will consider ways to improve the flow and accessibility of the document. In addition, the following will be developed:</p> <ul style="list-style-type: none"> - Plan on a page - Disability Action Plan on a page - Easy English version - Plain text, large font version

Unique ID	Submission	Officer response
		<p>We acknowledge your feedback regarding the inclusion of localised data and comparison with other peri-urban LGAs. Your suggestions to enhance community understanding through clearer presentation of gambling, alcohol, and drug-related data are appreciated and will be considered as part of the ongoing review. However, in some instances, it may not be possible to include comparative peri-urban data due to limited data availability, consistency, or relevance.</p> <p>Council recognises the importance of meaningful, accessible data and continues to work with regional partners and state agencies to improve the availability and quality of localised data to better inform planning, advocacy, and community engagement.</p>
3. ID1529	<p>Q36. In your view, do the strategies in the plan address the things that matter most to you in relation to increasing active living? Yes</p> <p>Q37. Provide your comments Congratulations on the development of your draft Health and Wellbeing Plan 2025–2029—an impressive and well-considered document that clearly reflects extensive consultation, expertise, and commitment to community health and well-being. As you continue refining the plan, we encourage consideration of a crucial yet often overlooked factor: cool, UV-protective shade. With more than 95% of skin cancer due to UV exposure, effective shade solutions play a vital role in reducing skin cancer risk. Shade also supports equitable access to outdoor spaces creating cool, safe, comfortable environments for community engagement, recreation, and active mobility. Incorporating specific mention of UV-protective shade in the plan would help ensure that public, play, and mobility spaces are designed with both thermal comfort and UV protection in mind. Without thoughtful integration, some shade designs and surface materials may inadvertently increase UV exposure, leading to unintended health risks. Please see 'Nillumbik Shire Council - SunSmart (CCV) suggestions for new Council Plans' at https://www.sunsmart.com.au/downloads/local-government-plans/Nillumbik%20Shire%20Council%20-%20SunSmart%20(CCV)%20suggestions%20for%20new%20Council%20Plans.pdf for suggestions on integrating UV into your new draft plan. We greatly appreciate your time and thoughtful consideration of this important opportunity to enhance public health outcomes through smart urban design. Thank you.</p>	<p>We are pleased to hear your thoughtful feedback and kind words regarding the Plan.</p> <p>We acknowledge the important role that UV-protective shade plays in supporting community health, particularly in reducing skin cancer risk and promoting equitable access to safe outdoor spaces. Your suggestion to incorporate UV considerations into the design of public, play, and mobility spaces is appreciated and will be reviewed as we refine the Plan</p> <p>Council is also keen to work with partners to identify funding opportunities that support the installation of UV-protective infrastructure, and will continue to consider shade and UV protection in the design of any new construction or upgrades to public places and spaces in line with existing plans and strategies.</p> <p>Thank you also for sharing the SunSmart resource, this will help inform future planning.</p>
4. ID1530	<p>Q28. In your view, do the strategies in the plan address the things that matter most to you in relation to improving mental wellbeing and social connection? No</p> <p>Q29. Provide your comments There is no cohesiveness when people can no longer be civil, whether it is the supermarket, within one's own property, or general getting around minding one's own business. So many are so prepared to be outraged, instantly, with no checks or balances on their various behaviors. It is all about them and their 'rule books' at the time. What is the point of Nillumbik Shire claiming they are preparing for the future, at any of the levels investigated, if people are increasingly duplicitous and refuse to get on. Collective consciousness no longer exists socially, respect for others is merely a glibly over-utilised word. No-one cares about the effects their behaviors might affect others</p> <p>Q30. In your view, do other aspects of the plan address the things that matter most to you in relation to improving mental wellbeing and social connection? No</p> <p>Q31. Provide your comments Living in a RCZ3+ zone we desperately wish to live with the attributes that we have preserved over decades, instead we have unrestrained excess light pollution, screaming children, excessively amplified door-slammings [rubbish bin lids/car doors/dwelling] doors, traffic. Need to have peace and quiet and zero light pollution for sanity, we all do! Other peoples' idea of peace and quiet is to exercise as much over stimulation as they want.</p> <p>Q32. In your view, do the strategies in the plan address the things that matter most to you in relation to preventing discrimination and violence? No</p> <p>Q33. Provide your comments There is no respect.</p>	<p>Thank you for taking the time to provide detailed feedback on the draft Health and Wellbeing Plan. We acknowledge your concerns. Your comments on public safety and social cohesion will be considered as we refine the Plan.</p>

Unique ID	Submission	Officer response
	<p>Sport has become an excuse to yell, bellow and scream and sound as violent as possible, as loudly as possible, not just contact sports-ball but cycling [repeat road users every week-end] as well.</p> <p>A stop needs to be incorporated to prevent turning every physical activity into a PB competition.</p> <p>Youth crime and weaponry has to stopped, NOW.</p> <p>Create a weapon amnesty, turn weapons into sculpture.</p> <p>Q34. In your view, do other aspects of the plan address the things that matter most to you in relation to preventing discrimination and violence?</p> <p>No</p> <p>Q35. Provide your comments</p> <p>Weeds Shire wide need eradicating.</p> <p>Feral deer have breed so much there is no feed, they are destroying everything, peoples' gardens/ orchards/ livestock feed, it is heartbreaking.</p> <p>Native Flora has been trashed, the rutting season still isn't over this year, they have become increasingly bold, it is downright dangerous having them collectively charging around our [and everyone else's] house/places/properties EVERY night.</p> <p>Am sick of finding aggressive males/youths with no manners acting how they want in public.</p> <p>Good manners cost nothing.</p> <p>Neighbours threatening to have others under surveillance.....what are you going to do about that????</p> <p>Q67. Any additional feedback you would like to provide on the consultation process?</p> <p>Please do not ignore increasing lighting pollution,[domestic and businesses], retrospective reduction implementation needs to be made so much easier.</p> <p>State Government legislation needs to be upgraded to facilitate reducing :- light pollution/noise pollution.</p> <p>Too much sensitivity towards minority groups inclusion issues, further shreds society.</p>	
5. ID1531	<p>Q28. In your view, do the strategies in the plan address the things that matter most to you in relation to improving mental wellbeing and social connection?</p> <p>Yes</p> <p>Q29. Provide your comments</p> <p>Quite comprehensive</p> <p>Q30. In your view, do other aspects of the plan address the things that matter most to you in relation to improving mental wellbeing and social connection?</p> <p>Yes</p> <p>Q31. Provide your comments</p> <p>Quite comprehensive</p> <p>Q32. In your view, do the strategies in the plan address the things that matter most to you in relation to preventing discrimination and violence?</p> <p>Yes</p> <p>Q33. Provide your comments</p> <p>Quite comprehensive</p> <p>Q34. In your view, do other aspects of the plan address the things that matter most to you in relation to preventing discrimination and violence?</p> <p>Yes</p> <p>Q35. Provide your comments</p> <p>Quite comprehensive</p> <p>Q36. In your view, do the strategies in the plan address the things that matter most to you in relation to increasing active living?</p> <p>Yes</p> <p>Q37. Provide your comments</p> <p>Quite comprehensive</p> <p>Q38. In your view, do other aspects of the plan address the things that matter most to you in relation to increasing active living?</p> <p>Yes</p> <p>Q39. Provide your comments</p> <p>Quite comprehensive</p> <p>Q40. In your view, do the strategies in the plan address the things that matter most to you in relation to improving food systems?</p> <p>Yes</p> <p>Q41. Provide your comments</p> <p>Quite comprehensive</p>	<p>We are pleased to hear your feedback and support of the plan. We acknowledge your response and appreciate you taking the time to review the document.</p>

Unique ID	Submission	Officer response
	<p>Q42. In your view, do other aspects of the plan address the things that matter most to you in relation to improving food systems? Yes</p> <p>Q43. Provide your comments Quite comprehensive</p> <p>Q48. In your view, do the strategies in the plan address the things that matter most to you in relation to advocating for and improving access to services, facilities and housing? A great priority</p> <p>Q50. In your view, do other aspects of the plan address the things that matter most to you in relation to advocating for and improving access to services, facilities and housing? Yes</p> <p>Q51. Provide your comments Especially for the aged and downsizing</p> <p>Q67. Any additional feedback you would like to provide on the consultation process? Extremely good communication There are those in the community that don't take an interest and are quick to complain They should be ignored</p>	
6. ID1534	<p>Q48. In your view, do the strategies in the plan address the things that matter most to you in relation to advocating for and improving access to services, facilities and housing? No</p> <p>Q49. Provide your comments To increase active living and to improve access to services, etc the recommendation from the PAAC is missing here - free access to 80+ people to use Council's gyms and pools. Strategies are very general and no defined actions listed.</p> <p>Q50. In your view, do other aspects of the plan address the things that matter most to you in relation to advocating for and improving access to services, facilities and housing?</p> <p>Q51. Provide your comments Confusing layout with Indicator and Target heading across plan and then immediately underneath a finding listed. Sometimes in the one sentence? Need to change layout and font. Paragraph 4 on page 6 needs improvement</p> <p>Q67. Any additional feedback you would like to provide on the consultation process? Graphics are good on cover and throughout. But want to see the health and wellbeing action plan and how implemented as this is a planning framework only.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>As we refine the plan we will review the layout and readability of the Plan.</p> <p>We acknowledge your comment on recommendations from the Positive Ageing Advisory Committee. All recommendations received through the community engagement process were carefully considered in developing the Plan. The recommendation from the PAAC will be considered by Council later this year.</p>
7. NEPHU	<p>Q28. In your view, do the strategies in the plan address the things that matter most to you in relation to improving mental wellbeing and social connection? Yes</p> <p>Q29. Provide your comments The plan contains a target to 'Decrease number of adults who sought help for a mental health problem'. Was this intended? It is important for people to seek help early, and as needed, to stay well. I would suggest removing a specific target relating to this indicator, however, it is an important one to monitor.</p> <p>Q67. Any additional feedback you would like to provide on the consultation process? Ideally, feedback about the consultation process would be anonymous. Otherwise good though!</p> <p>Reword NEPHU definition to include sentence about LPHUs: NEPHU one of nine Local Public Health Units (LPHUs) across Victoria, funded by the Victorian Government and hosted by Austin Health. <i>LPHUs work at regional level and collaborate with a range of partners, including local government, to improve population health.</i> NEPHU serves the northern and northeastern metropolitan region of Melbourne, including areas like Nillumbik, Whittlesea, Hume, and the Yarra Ranges, covering a population of over 1.8 million people across 12 local government areas.</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We acknowledge your comment highlighting the importance of encouraging early help seeking. This insight will be considered as we continue to review and refine the plan.</p>
8. Green Wedge Protection Group	<p>Q38. In your view, do other aspects of the plan address the things that matter most to you in relation to increasing active living?</p> <p>Q39. Provide your comments Important that we consider the point mentioned in "Climate Changes Impacts on Health: having a resilient natural environment" MUST focus on the retention of, and minimise damage to, existing natural areas as well as improve connectivity between those areas. Healthy ecosystems extrapolate to healthy human environments</p>	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We acknowledge the importance of protecting natural areas and biodiversity as part of supporting active living and community wellbeing, and climate which is also reflected in the Biodiversity Strategy 2024-2034 and the Climate Action Plan 2022-2032 which prioritise the protection of remnant vegetation, improving habitat connectivity, and creating environments</p>

Unique ID	Submission	Officer response
	and healthy human minds, and the health of our natural ecosystems starts with placing the protection of remnant habitats and biodiversity hotspots as a highest priority.	that support both ecological resilience and human health. Your comments will be considered as we continue to review and refine the plan.
9. Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation	<p>A specific consultation with Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation was held on 11 July 2025. The following items were discussed:</p> <ul style="list-style-type: none"> • Acknowledgment of Country to be updated as per report coming to Council for endorsement on 30 September. Request to include a statement on what health and wellbeing means to First Peoples. • During the discussion on Priority 3 – Increase Active Living, it was suggested that promoting sport and recreation opportunities and supporting people who can't afford sport be included. • In relation to Priority 4 – Improving Food Systems, it was recommended that the strategy "Provide opportunities for the community to develop skills and connection to food growing and cooking" be expanded to include "nutrient-dense bush foods." In addition the strategy "Enhance sustainability and reduce the carbon-footprint of the local food system" to include "by growing nutrient dense bush food". • While discussing Priority 6 – Advocating for and Improving Access to Services, Facilities and Housing, there was a suggestion to specifically include social housing in the wording. 	<p>We acknowledge the Aunties response to the Plan and appreciate their time to review the document.</p> <p>We acknowledge the importance of updating the Acknowledgement of Country to include a statement on what health and wellbeing means to First Peoples and note that the current Nillumbik Health and Wellbeing Plan 2021- 2025 includes this statement.</p> <p>Feedback from the Aunties will be considered as we continue to review and refine the plan.</p>

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Locker 11
Victorian Pride Centre
79-81 Fitzroy Street
St Kilda, Victoria 3182
vicpridelobby.org

SUBMISSION 1

22 June 2025

Via email: engagement@nillumbik.vic.gov.au

To whom it may concern,

Re: Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029

Thank you for the opportunity to provide input on the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029.

The Victorian Pride Lobby is a community based advocacy group that represents lesbian, gay, bisexual, queer and same sex attracted Victorians of all ages, including those who live, study, work and recreate in Nillumbik.

We welcome the inclusion of LGBTIQ+ communities and gender diverse people as priority populations in the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029.

We recommend that data from the Snapshot on Priority Populations, including LGBTIQ+ people, be included in the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029 under the Nillumbik Health and Wellbeing Profile 2025.

We note that there is no action plan or advisory committee for LGBTIQ+ communities, unlike other priority populations.

Carers	No action plan or advisory committee
Children and young people	Youth Strategy 2022 – 2026 Factsheet: Children and Families 2025 Factsheet: Young People 2025 Nillumbik Youth Council
Cultural and linguistically diverse people	No action plan or advisory committee
First Nations People	Reconciliation Action Plan Nillumbik Reconciliation Group
LGBTIQ+ communities Gender diverse people	No action plan or advisory committee



Older people	Ageing Well in Nillumbik Action Plan 2019 – 2022* Factsheet: Older People 2025 Positive Ageing Advisory Committee
People experiencing financial insecurity	Financial Hardship Policy 2021 No advisory committee
People who live rurally or are geographically isolated	No action plan or advisory committee
People with a disability, chronic disease and/or mental illness	Disability Action Plan 2020 – 2024* Factsheet: People with a Disability 2025 Inclusion and Access Advisory Committee
Refugees and people seeking asylum	No action plan or advisory committee
Women and girls	Gender Equality Action Plan 2021 – 2025 No advisory committee

* These action plans have been incorporated into the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029.

We recommend that the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029 include two strategies, under Priority 2 - Preventing Discrimination and Violence, as follows:

- "Initiate a Gender Equality and LGBTIQA+ Advisory Committee"
- "Develop an LGBTIQA+ Action Plan"

The former recommendation is based on the Gender Equality and LGBTIQA+ Advisory Committee in neighbouring Manningham. We note that, at its 25 March 2025 meeting, Council agreed to receive and note a petition to establish an LGBTIQA+ Advisory Committee, refer the petition to the Director of Communities for investigation and review, receive a briefing on the outcomes of this review, and advise us - as the petition organiser - of the outcome of this review.

We understand that the request to establish an LGBTIQA+ Advisory Committee is still under review, and we request that this be taken into consideration as part of that review and that terms of reference be prepared for approval by Council within a reasonable time.

We also recommend that Council develop a factsheet on LGBTIQA+ communities to be included on the Health and Wellbeing Plan webpage on Council's website.



We welcome the inclusion of strategies relating to the health and wellbeing of LGBTIQ+ communities in the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029, including:

- Prevent discrimination and increase LGBTIQ+ inclusion and participation through leadership and Council policies, plans and programs.
- Remove barriers for participation in sport and recreation for women and girls, people with disability, LGBTIQ+ people, people from culturally diverse backgrounds, and First Nations People.

The former is connected to an indicator of a “decrease in percentage of people reporting having experienced discrimination in the last 12 months.” However, there is no indicator connected to the latter.

We recommend that the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029 include an indicator, under Priority 3 - Increasing Active Living, as follows: “Increase in participation in sport and recreation by women and girls, people with a disability, LGBTIQ+ people, people from culturally diverse backgrounds, and First Nations people, in line with Council’s Fair Access Policy.”

We also welcome the inclusion of a statement in the Nillumbik Draft Municipal Health and Wellbeing Plan 2025 - 2029 that “family violence also includes abuse experienced by... the LGBTIQ+ community.”

We thank you for the opportunity to make this submission and look forward to your consideration and response.

Yours sincerely,

[Redacted signature]

Victorian Pride Lobby - Rainbow Local Government campaign

SUBMISSION 2

SUBMISSION ON DRAFT COUNCIL PLANS 2025

SUBMITTER: Eltham Community Action group (**ECAG**)

CONTACT EMAIL ADDRESS: elthamcag@yahoo.com

DATE: 8 July 2025

SUBMISSION

ECAG's submission on the *Draft Council Plan 2025-2029*, the *Draft Asset Plan 2025 – 2035* and the *Draft Municipal Health and Wellbeing Plan 2025 – 2029* is as follows:

1. Draft Council Plan 2025 – 2029

This document is clearly written and easy to comprehend. It lays out information to the reader in such a way that the purpose of the document is not 'wordy' but is succinct.

ECAG would like Council to consider a few changes to reinforce or clarify some points and to make some additions.

1. Our People

Priority Actions

- on page 15:
2a) **Strongly** advocate for **adequate** funding of infrastructure by **State & Federal Governments in the light of the current planning reforms together with ensuring that the new** housing and planning reform protect local Neighbourhood Character.

Please consider using the wording in bold above that is stronger and clearer than the existing draft statement.

- Similarly, add the word **Strongly** before 'advocate' at the beginning of 2q and 2r.

3. Our Future

- At:

Protection and enhancement of the Tree Canopy	
Strategy How will Council work towards its objective?	Priority actions What will Council focus on?
3.6 Enhance the Shire's urban tree canopy as a means of climate adaptation, improving neighbourhood character and habitat, as well as liveability.	3i) Protect mature trees to reduce canopy loss, revegetate suitable areas with low tree coverage and support biodiversity through implementation of the Urban Tree Canopy Strategy.
3.7 Foster community stewardship of the urban tree canopy including in new developments through a 'New Resident' pack of information that is a welcome pack outlining all Council services and pertinent regulations	3j) Supply annual indigenous seedling vouchers for community to support sustainable planting and improving habitat on private land.
3.8 Develop and maintain in real time, a publicly available spreadsheet that collects data to show where and how trees have been removed from both private & public land and the species and size of each tree. This is in order to direct landholders and council to replace tree loss as close as possible to the original site and, if this is not possible on private land, on public land in the local community area.	

Please use either the wording in bold that we have inserted above or similar wording that mirrors the intent of the bolded wording. Regarding the strategy that we have suggested at 3.8, ECAG notes that off-set planting regulations do not ensure that the existing tree coverage is maintained in the same local area.

- on page 23 at:

'Edendale Community Environment Farm

We operate the farm as a hub for environmental education, offering programs, demonstrations, and a plant nursery, to connect the community with sustainable practices.'

Comment – Please delete the comma after demonstrations and replace it after nursery, otherwise it reads as if it is only the nursery that connects to the community.

4. Our Council

At page 25:

- 4.6 & 4.d - Insert the word shown in bold to become: 'proactively and **strongly** advocate.....'
- 4.7 - Reference back to the current State & Federal Government push to increase housing as the reason for the need to advocate for funding for new infrastructure because of increases in population.
- Add a new point:

4.8 Develop content of a Council 'Welcome Package' for new residents, either renters or owners. This will need the cooperation of estate agents.

The idea is that newcomers will need information about Council services, a little about the history and culture of the area (including environmental values & information) so that the area where they now live will be similar for future generations. Obviously, this will not be read by all but something is better than nothing. This area is unique and it needs to be made known to all residents.

2. Draft Asset Plan 2025 – 2035

ECAG has, for many years, been asking Nillumbik Council to make spreadsheets of tree removals both on private and public land.

The Draft Asset Plan demonstrates why this should occur and the glossary on page 3 quoted below makes this absolutely clear. Trees are assets.

Asset	An item, thing or entity that has actual or potential value to an organisation.
-------	---

Until Nillumbik Council understands that trees have 'an actual or potential value to an organisation' we will never fully be an environmentally forward thinking municipality – other Councils like Melbourne City Council plan for climate change, so it is possible here too.

On page 4 the Glossary states:

Renewals	Works to replace existing assets or facilities with assets or facilities of equivalent capacity or performance capability.
Replacement	Definition Value Cost the entity would incur to acquire the asset on the date that is reported. The cost is measured by

	reference to the lowest cost at which the gross future economic benefits could be obtained in the normal course of business or the minimum it would cost, to replace the existing asset with a new modern equivalent asset with the same economic benefits allowing for any differences in the quantity and quality of output and in operating costs.
--	---

Council already plants and replaces trees so why are they not counted as assets? Admittedly they are living items or things but their existence has a value and, again, on page 3 the definition of Value could apply to trees.

ECAG realises that some 'original thinking' would apply to thinking about and accepting that trees are assets – if other municipalities do, why not Nillumbik?

Food for thought for the next 4-year Asset plan.

This Asset plan must accommodate the issues that will occur with the increased population proposed by the State Government.

Page 31 shows that it is being considered as follows:

Documentation	Requirements.
Eltham Lower Park Masterplan	Provides a strategic direction for the future development of the park by establishing a priority works plan to meet the needs of Council, permanent tenants, passive users and casual visitors
Eltham Major Activity Centre / Structure Plan	Sets out the overall vision, objectives, strategies and actions for the town centre of Eltham. It provides the scope for change, renewal and identifies the means of providing future physical infrastructure and community facilities.

In the 'Requirements' for the Eltham Lower Park Masterplan a reference to 'passive users' is missing. ECAG submits that this group should also be considered and reference to it should be inserted as shown above in bold. Please include those two words in the final document.

Pages 34-5 show that, in the 25 year timeline being considered in this document, the Nillumbik population will be raised by 10,000 people (using the document's figures 2021- 63,487 to 2046 to 73,089 residents).

Most of the increased population will live in dwellings in Eltham.

Eltham Central will have a 33.52% increase of 1,134 dwellings

Eltham E	“ “	6.98%	“	93	‘
Edendale		7.97%		88	“
Eltham South		19.10%		224	
Eltham North		8.72%		136	

Page 36 states:

- Council **may** need to expand services and facilities to cater for the community growth.

Surely this should read 'WILL need' to expand services and facilities to cater for the community growth.

Again on Page 39 at:

Drainage

Demand Driver	Category	Change in Demand	Impact of Services
Climate change: annual rainfall volume within South-east Australia	Drainage	Annual rainfall expected to decrease 10% by 2030 and 35% by 2070	Less rainwater will increase the demand for uptake of stormwater for reuse. This• may require upgrades to existing infrastructure, or acquisitions, to fulfil these demands

. •**Surely this should read 'WILL require'**.

Elsewhere on page 39 there are a number of instances of '**may need**' that should be changed to '**will need**' in order to cope with climate change.

With the long timeframe being considered in this document a crystal ball would have been a useful tool in regarding climate change effects but the needs of an increased population are already apparent and planning should be developed for the worst case scenario rather than hoping for the best.

3. Draft Municipal Health and Wellbeing Plan (MHWP) 2025 – 2029

This high-level document is aiming to show how the overall MHWP is tying together six main aspects of concern to do with the health & wellbeing of the Nillumbik community and, at the same time, referencing other State & Council documents to show how Nillumbik is planning to comply with all aspects of concern and the legal requirements in the next four years.

As such complex documents are not easy for the average reader to comprehend, there need to be clear signs of what the practical outcomes are to be. Sentences with many adjectives tend to make statements unclear.

Until page 30 the document was basically 'setting the scene' with the average reader not being comfortable as to where the document was heading in practical terms.

The fact that Monitoring and Assessment procedures had been developed should have been flagged prior to the 'Setting the scene' sections.

It is only at page 19 that there was an obvious clear aim when priority areas were listed and then, finally, on page 30 of 33, there was what should have been far closer to the beginning – the Implementation.

Implementation

A detailed set of actions to support the implementation of the strategies in this Plan will be collaboratively developed annually across Council in response to local data, community engagement, and Councillor feedback. These actions will guide the implementation of the Health and Wellbeing Plan over its four-year lifespan.

These annually developed action plans will detail:

- *The actions to be delivered*
- *Timeframes for delivery*
- *Responsible Council teams*
- *Partner organisations involved*

The development and review of these annual plans will be undertaken in partnership with the Health and Wellbeing Advisory Committee, other relevant advisory committees, and through the Health and Wellbeing Partnership Forum. Both the Annual Action Plans and accompanying progress reports will be published on Council's website to ensure transparency and accountability.

It was very interesting reading this document as the 'setting the scene' sections did this comprehensively.

It would have been educative on page 21, where indicative targets were shown, to include past information and comparison statistics with other peri-urban LGAs as this would have given a more accurate picture. We are fortunate to be living here and comparing our statistics with urban councils does not give the full local situation.

EGAG would like Council to point out to residents the figures relating to Nillumbik in the loss of money per adult on gaming machines (page 27). That there is a \$190 per adult daily spend across 2 venues in Nillumbik, is astounding. ECAG suggests that the statements in the snapshots on page 8 of hospitalisation due to drug (both medical & illicit) and alcohol being higher in Melbourne also need more detailed information.

Local residents need to become more aware of these problems within our community. Spending on developing programs would be more accepted if the reality was known and understood.

It is to be hoped that, in the final document, a couple of possible omissions can be rectified:

Page 9: 7th dot point is marked as having x number of submissions.

Page 10: at line 4 a date needs to be inserted.

Unique ID	Submission	Officer response
DOC/25/64712 Eltham Community Action Group	Please refer to submission attached – Attachment 1.1	<p>1. Recognition of Trees as Assets We thank you for your submission to the draft Asset Plan 2025-2035, and acknowledge that trees provide environmental, economic and social value to the community and contribute meaningfully to climate resilience, biodiversity, and amenity.</p> <p>Despite the acknowledged benefits of trees, Councils typically do not recognise them as financial assets in their balance sheets or asset plans due to current accounting standards and valuation challenges. Unlike traditional infrastructure, trees do not have a clear acquisition cost, predictable lifespan, or easily measurable market value, making it difficult to apply conventional asset accounting principles.</p> <p>Additionally, the intangible and non-monetary nature of many of their benefits, such as shade, habitat, and aesthetic contribution, complicates efforts to quantify them in financial terms. As a result, while trees are critically important to urban environments, they are managed through service delivery and planning strategies rather than formal asset registers.</p> <p>2. Inclusion of 'Passive Users' in the Eltham Lower Park Masterplan We agree with ECAG's recommendation to explicitly acknowledge "passive users" as a user group in the context of the Eltham Lower Park Masterplan.</p> <p>The wording in the requirements section for the Eltham Lower Park Masterplan (Page 31 of the draft Asset Plan) will be updated in the final version to include passive users alongside other park stakeholders.</p> <p>3. Population Growth and Language in the Draft Asset Plan Section 8 of the draft Asset Plan refers to projected changes in population and climate (e.g. reduced annual rainfall) and their potential impact on Council services and infrastructure. These forecasts are based on the best-available data but involve an element of uncertainty due to their long-range projection.</p> <p>For this reason, the term "may" is used deliberately, as it reflects the current evidence and planning assumptions. While we acknowledge the importance of proactive planning, using "will" would suggest a level of certainty that is not yet supported by available data.</p> <p>No change to the language is proposed at this stage, but we will continue to monitor trends and review terminology as forecasts evolve.</p>

Unique ID	Submission	Officer response
1533	Q53. Provide your comment on the Asset Plan 2025-2035. (Blank)	Thank you for your submission. Upon review, we note that your submission does not contain specific feedback or comment related to the content or direction of the draft Asset Plan. As such, no changes to the Plan are proposed in response to this submission.
1548 Green Wedge Protection Group	Please refer to submission attached – Attachment 1.2	Thank you for your submission. Upon review, we note that your submission does not contain specific feedback or comment related to the content or direction of the draft Asset Plan. As such, no changes to the Plan are proposed in response to this submission.
1551	Please refer to submission attached – Attachment 1.3	<p>Thank you for your feedback, We acknowledge your response and appreciate you taking the time to review the draft Asset Plan.</p> <p>1. Currency and Use of Referenced Documents The Council documents listed in Section 7 of the draft Asset Plan remain active until they are formally superseded. These plans, policies, and strategies continue to guide asset planning and decision-making, even where they may not directly reflect more recent context or projects.</p> <p>Endorsement dates have not been included within this section, as newer versions may be adopted over the life of the Plan. Including fixed dates could unintentionally suggest that the listed versions will remain static. As the Asset Plan is reviewed every four years, Council will reassess and update document references accordingly to reflect any newly endorsed versions.</p> <p>2. Identification of Outdated Documents and Information Gaps While the current Asset Plan presents a high-level view of supporting documentation, Council recognises the value in clearly identifying information gaps. This approach will be considered for inclusion in future versions, particularly through asset plan updates and internal planning registers, where more detailed tracking of documentation age and review priorities is maintained.</p> <p>3. Climate Emergency, Innovation and Integrated Asset Management The draft Asset Plan aligns with the Local Government Act 2020, which requires a 10-year strategic view of asset classes and outlines Council's responsibilities over infrastructure assets. The asset categories in the Plan are aligned with Council's four existing asset management plans and follow industry-typical groupings.</p> <p>Council acknowledges the importance of integrated planning and innovation, specifically with regards to climate change. Work is underway across departments to strengthen collaboration, adapt infrastructure to</p>

Unique ID	Submission	Officer response
		<p>climate pressures, and implement nature-based and forward-thinking solutions.</p> <p>Your suggestion to include diagrammatic representations of how asset categories overlap and influence one another is noted and will be considered, in particular for supporting documents.</p> <p>4. Internal Culture, Collaboration, and Implementation</p> <p>Feedback Summary:</p> <p>Council acknowledges that cultural change and internal collaboration are key enablers of effective asset planning. Efforts are underway to embed innovation, shared accountability, and continuous improvement across teams. Strategic planning processes, including the Asset Plan and its supporting frameworks, will continue to evolve in line with best practice and community expectations.</p>

SUBMISSION ON DRAFT COUNCIL PLANS 2025

SUBMITTER: Eltham Community Action group (**ECAG**)

CONTACT EMAIL ADDRESS: elthamcag@yahoo.com

DATE: 8 July 2025

SUBMISSION

ECAG's submission on the *Draft Council Plan 2025-2029*, the *Draft Asset Plan 2025 – 2035* and the *Draft Municipal Health and Wellbeing Plan 2025 – 2029* is as follows:

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This document is clearly written and easy to comprehend. It lays out information to the reader in such a way that the purpose of the document is not 'wordy' but is succinct.

ECAG would like Council to consider a few changes to reinforce or clarify some points and to make some additions.

1. Our People

Priority Actions

- on page 15:
2a) **Strongly** advocate for **adequate** funding of infrastructure by **State & Federal Governments in the light of the current planning reforms together with ensuring that the new** housing and planning reform protect local Neighbourhood Character.

Please consider using the wording in bold above that is stronger and clearer than the existing draft statement.

- Similarly, add the word **Strongly** before 'advocate' at the beginning of 2q and 2r.

3. Our Future

- At:

Protection and enhancement of the Tree Canopy	
Strategy How will Council work towards its objective?	Priority actions What will Council focus on?
3.6 Enhance the Shire's urban tree canopy as a means of climate adaptation, improving neighbourhood character and habitat, as well as liveability.	3i) Protect mature trees to reduce canopy loss, revegetate suitable areas with low tree coverage and support biodiversity through implementation of the Urban Tree Canopy Strategy.
3.7 Foster community stewardship of the urban tree canopy including in new developments through a 'New Resident' pack of information that is a welcome pack outlining all Council services and pertinent regulations	3j) Supply annual indigenous seedling vouchers for community to support sustainable planting and improving habitat on private land.
3.8 Develop and maintain in real time, a publicly available spreadsheet that collects data to show where and how trees have been removed from both private & public land and the species and size of each tree. This is in order to direct landholders and council to replace tree loss as close as possible to the original site and, if this is not possible on private land, on public land in the local community area.	

Please use either the wording in bold that we have inserted above or similar wording that mirrors the intent of the bolded wording. Regarding the strategy that we have suggested at 3.8, ECAG notes that off-set planting regulations do not ensure that the existing tree coverage is maintained in the same local area.

- on page 23 at:

'Edendale Community Environment Farm

We operate the farm as a hub for environmental education, offering programs, demonstrations, and a plant nursery, to connect the community with sustainable practices.'

Comment – Please delete the comma after demonstrations and replace it after nursery, otherwise it reads as if it is only the nursery that connects to the community.

4. Our Council

At page 25:

- 4.6 & 4.d - Insert the word shown in bold to become: 'proactively and **strongly** advocate.....'
- 4.7 - Reference back to the current State & Federal Government push to increase housing as the reason for the need to advocate for funding for new infrastructure because of increases in population.
- Add a new point:

4.8 Develop content of a Council 'Welcome Package' for new residents, either renters or owners. This will need the cooperation of estate agents.

The idea is that newcomers will need information about Council services, a little about the history and culture of the area (including environmental values & information) so that the area where they now live will be similar for future generations. Obviously, this will not be read by all but something is better than nothing. This area is unique and it needs to be made known to all residents.

2. Draft Asset Plan 2025 – 2035

ECAG has, for many years, been asking Nillumbik Council to make spreadsheets of tree removals both on private and public land.

The Draft Asset Plan demonstrates why this should occur and the glossary on page 3 quoted below makes this absolutely clear. Trees are assets.

Asset	An item, thing or entity that has actual or potential value to an organisation.
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Until Nillumbik Council understands that trees have 'an actual or potential value to an organisation' we will never fully be an environmentally forward thinking municipality – other Councils like Melbourne City Council plan for climate change, so it is possible here too.

On page 4 the Glossary states:

Renewals	Works to replace existing assets or facilities with assets or facilities of equivalent capacity or performance capability.
Replacement	Definition Value Cost the entity would incur to acquire the asset on the date that is reported. The cost is measured by

	reference to the lowest cost at which the gross future economic benefits could be obtained in the normal course of business or the minimum it would cost, to replace the existing asset with a new modern equivalent asset with the same economic benefits allowing for any differences in the quantity and quality of output and in operating costs.
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Council already plants and replaces trees so why are they not counted as assets? Admittedly they are living items or things but their existence has a value and, again, on page 3 the definition of Value could apply to trees.

ECAG realises that some 'original thinking' would apply to thinking about and accepting that trees are assets – if other municipalities do, why not Nillumbik?

Food for thought for the next 4-year Asset plan.

This Asset plan must accommodate the issues that will occur with the increased population proposed by the State Government.

Page 31 shows that it is being considered as follows:

Documentation	Requirements.
Eltham Lower Park Masterplan	Provides a strategic direction for the future development of the park by establishing a priority works plan to meet the needs of Council, permanent tenants, passive users and casual visitors
Eltham Major Activity Centre / Structure Plan	Sets out the overall vision, objectives, strategies and actions for the town centre of Eltham. It provides the scope for change, renewal and identifies the means of providing future physical infrastructure and community facilities.

In the 'Requirements' for the Eltham Lower Park Masterplan a reference to 'passive users' is missing. ECAG submits that this group should also be considered and reference to it should be inserted as shown above in bold. Please include those two words in the final document.

Pages 34-5 show that, in the 25 year timeline being considered in this document, the Nillumbik population will be raised by 10,000 people (using the document's figures 2021- 63,487 to 2046 to 73,089 residents).

Most of the increased population will live in dwellings in Eltham.

Eltham Central will have a 33.52% increase of 1,134 dwellings

Eltham E	“ “	6.98%	“	93	‘
Edendale		7.97%		88	“
Eltham South		19.10%		224	
Eltham North		8.72%		136	

Page 36 states:

- Council **may** need to expand services and facilities to cater for the community growth.

Surely this should read 'WILL need' to expand services and facilities to cater for the community growth.

Again on Page 39 at:

Drainage

Demand Driver	Category	Change in Demand	Impact of Services
Climate change: annual rainfall volume within South-east Australia	Drainage	Annual rainfall expected to decrease 10% by 2030 and 35% by 2070	Less rainwater will increase the demand for uptake of stormwater for reuse. This • may require upgrades to existing infrastructure, or acquisitions, to fulfil these demands

. •**Surely this should read 'WILL require'**.

Elsewhere on page 39 there are a number of instances of '**may need**' that should be changed to '**will need**' in order to cope with climate change.

With the long timeframe being considered in this document a crystal ball would have been a useful tool in regarding climate change effects but the needs of an increased population are already apparent and planning should be developed for the worst case scenario rather than hoping for the best.

3. Draft Municipal Health and Wellbeing Plan (MHWP) 2025 – 2029

This high-level document is aiming to show how the overall MHWP is tying together six main aspects of concern to do with the health & wellbeing of the Nillumbik community and, at the same time, referencing other State & Council documents to show how Nillumbik is planning to comply with all aspects of concern and the legal requirements in the next four years.

As such complex documents are not easy for the average reader to comprehend, there need to be clear signs of what the practical outcomes are to be. Sentences with many adjectives tend to make statements unclear.

Until page 30 the document was basically 'setting the scene' with the average reader not being comfortable as to where the document was heading in practical terms.

The fact that Monitoring and Assessment procedures had been developed should have been flagged prior to the 'Setting the scene' sections.

It is only at page 19 that there was an obvious clear aim when priority areas were listed and then, finally, on page 30 of 33, there was what should have been far closer to the beginning – the Implementation.

Implementation

A detailed set of actions to support the implementation of the strategies in this Plan will be collaboratively developed annually across Council in response to local data, community engagement, and Councillor feedback. These actions will guide the implementation of the Health and Wellbeing Plan over its four-year lifespan.

These annually developed action plans will detail:

- *The actions to be delivered*
- *Timeframes for delivery*
- *Responsible Council teams*
- *Partner organisations involved*

The development and review of these annual plans will be undertaken in partnership with the Health and Wellbeing Advisory Committee, other relevant advisory committees, and through the Health and Wellbeing Partnership Forum. Both the Annual Action Plans and accompanying progress reports will be published on Council's website to ensure transparency and accountability.

It was very interesting reading this document as the 'setting the scene' sections did this comprehensively.

It would have been educative on page 21, where indicative targets were shown, to include past information and comparison statistics with other peri-urban LGAs as this would have given a more accurate picture. We are fortunate to be living here and comparing our statistics with urban councils does not give the full local situation.

EGAG would like Council to point out to residents the figures relating to Nillumbik in the loss of money per adult on gaming machines (page 27). That there is a \$190 per adult daily spend across 2 venues in Nillumbik, is astounding. ECAG suggests that the statements in the snapshots on page 8 of hospitalisation due to drug (both medical & illicit) and alcohol being higher in Melbourne also need more detailed information.

Local residents need to become more aware of these problems within our community. Spending on developing programs would be more accepted if the reality was known and understood.

It is to be hoped that, in the final document, a couple of possible omissions can be rectified:

Page 9: 7th dot point is marked as having x number of submissions.

Page 10: at line 4 a date needs to be inserted.



July 9, 2025

The Green Wedge Protection Group (GWPG) was formally incorporated in 1995, following municipal amalgamations. Less formally, the Group has existed since the early 1970s. The Purposes of the Green Wedge Protection Group include:-

- Working to ensure that residents and public officials of the Shire of Nillumbik act together to protect the environment; develop a high quality urban lifestyle within limited designated areas; and promote a rural lifestyle with sensitive farming and enhanced conservation objectives.
- Ensuring the Green Wedge is the strategic focus of the Shire of Nillumbik as outlined by the Local Government Review Board's final recommendation.
- Providing input to the Shire of Nillumbik and other decision making bodies on any matter considered relevant to the Green Wedge.

The Green Wedge Protection Group is heavily involved in state and local planning issues, both currently and prior to the group's formal inception, and will continue to provide advice and direction to authorities to ensure the intent of our Green Wedges is upheld at all levels of Government, and the values protected. The GWPG has involvement in the Green Wedges Coalition, and makes many submissions on state-level planning and environmental issues.

1.0 Green Wedge Concerns

The Green Wedge Protection Group (GWPG) would like to bring to your attention several areas in which we believe Nillumbik Council has dropped the ball. Nillumbik proudly calls itself The Green Wedge Shire, however, has done very little in the last 2 terms of council to ensure that it remains so. We would appreciate your consideration of the information provided on a few of the environmental problems that we believe need to be rectified if Nillumbik is to retain the mantle of The Green Wedge Shire. These issues should be considered **within the Council Plan, with additional discussion points included in Section 2.0:**

Major Concerns:

1. Illegal vegetation removal – there is a long history of communications between GWPG and Council around this issue and lack of appropriate compliance action. This will be covered in a follow-up letter.
2. Weed control and maintenance – concerns are a reduction in funding, and Nillumbik's lack of implementation of the CALP Act. See Appendix 3 for an article published in the Manningham and Nillumbik Bulletin. Appendix 4 lists 6 Regionally restricted weeds and some of their extensive infestations within Nillumbik, the majority of locations are on private land. There are at least another 21 Regionally restricted weeds within Nillumbik that should also be controlled. The following links provided for your information:
CALP ACT: <https://www.legislation.vic.gov.au/in-force/acts/catchment-and-land-protection-act-1994/072>
CALP Listed Species: <https://agriculture.vic.gov.au/biosecurity/protecting->

[victoria/legislation-policy-and-permits/consolidated-lists-of-declared-noxious-weeds-and-pest-animals](#)

3. Cat curfew – disappointingly, The Green Wedge Shire has failed to implement a 24 hr cat curfew, unlike neighbouring shires Manningham, Whittlesea and Yarra Ranges.

The GWPG strongly emphasizes the importance of ongoing Council support for Landcare. This includes maintenance of the Landcare Facilitator position. We currently have an excellent coordinator in [REDACTED] – his enthusiasm and support for the Landcare groups is exemplary. We would strongly support his reappointment to this role. We also strongly endorse the continuation and enhancement of the Land Management Incentive Program (LMIP). We would also like to see the reactivation of the Forest Health Monitoring Program with the involvement of the Nillumbik Landcare Network. GWPG also recommends Nillumbik explore the creation of urban landcare networks and the development of Intrepid Landcare groups.

The following is the conclusion to the GWPG submission to Council on the 2024 Biodiversity Strategy which we include to reinforce our comments above:

“In conclusion:

The most impressive Biodiversity Strategy with lofty, ambitious intentions is only as good as the will of those who are in the position to implement those goals and ambitions. Sadly, there has been little will by councillors within the last two council terms to preserve Nillumbik’s biodiversity. The lack of will by both council and councillors to arrest illegal vegetation removal, to confront the ongoing wildlife carnage wrought by cats and the rampant spread of CaLP classified weeds across the shire are only three of the many major issues, left unaddressed by our recent past and current councillors, that are destroying our natural heritage. Ultimately it is the councillors that direct council actions, most have not risen to the occasion!

This Biodiversity Strategy needs to address these three issues with strong statements on direction and implementation timelines.

- Illegal removal of vegetation must cease, compliance and rehabilitation management plans are essential - to implement these actions requires a timeline of not more than twelve months.
- 24 hour cat curfews can be achieved within twelve months saving countless faunal lives.
- Weed control requires a longer term of commitment. The life of this Biodiversity Strategy will be around ten years. For effective control and maintenance of the shires burgeoning weed problems, a ten year strategy for weed control will need to be developed and included within the current draft Biodiversity Strategy. Ongoing funding for these initiatives is essential and immediate implementation required, prolonging implementation will only add further costs to both the environment and councils bottom line.

Thank you for the opportunity to comment on this draft plan. The objectives, content and structure of this Draft Strategy are commendable, and the Green Wedge Protection Group thank Council and staff for committing to the production of this important document. We now look forward to very positive biodiversity outcomes within our unique and highly valued Nillumbik Shire. “

Nillumbik Council was created under the Kennett Governments policy of Local Government Restructure. The Chair of the Local Government Restructure Board, Leonie Bourke, recommended the formation of the Shire of Montsalvat (later renamed Nillumbik) as a “conservation council, with the Green Wedge as its strategic focus” to “allow for better protection and enhancement of the natural resource base, sustainable land management, and provide a high quality environment for residents and visitors.”

2.0 Council Plan Discussion Points

The Council Plan will be a major plank in outlining this councils objectives, directions, goals and aspirations for Nillumbik over the next four years.

Nillumbik in the past has shown leadership, vision and innovative thinking that placed the Shire at the forefront of environmental sustainability, we are the Green Wedge Shire. This is not a slogan, but a reflection of our creation as a “conservation Shire with the Green Wedge as its strategic focus”.

Nillumbik as a Shire should build on its strengths, it is a wonderful place to work, live and to participate in a huge choice of recreational activities. Nillumbik is blessed with a rich and diverse environment that is loved and valued by its residents.

Nillumbik is not an economic powerhouse and to attempt to portray it as such is futile. Communities and small businesses should be supported, but through the lens of maintaining a clear focus on why Nillumbik was created.

Councillors will need to work cooperatively together and with the community, to produce a plan that reflects the combined goals as, too often, the bureaucracy impose their will upon the outcome. While we know that community consultation will be sought, it appears to be purely a box-ticking exercise, for generally, from past experience, it does not result in any effective change to the draft. This is your opportunity to make a positive impact on the future of Nillumbik by setting a progressive agenda within the Council Plan for the next 4 years.

Points to consider within the Council Plan development:

- Green Wedge Management Plan may need rewriting under State Government Action Plan: Planning for Melbourne’s Green Wedges and Agricultural Land future Key Actions 10 and 11. These Practices Notes will direct the production and standardise Green Wedge Management Plans. Issues that do require addressing include, but are not restricted to:
 - Tiny homes,
 - Shipping containers (covered in the Local Laws but needs strengthening)
 - Weed management and control, including implementation of the CaLP Act.
 - Roadside management, to include issue of mowing, planting and landscaping, grading, herbicide use,
 - Classification and management of Burgan
 - Long-overdue statutory reviews of ESO’s and SLO’s.
 - “Industrialisation” by earthmoving contractors etc using site for vehicle storage.
- Housing Strategy:
 - Develop a strong planning-based position in response to the state government’s Housing Statement
 - Work with Local Government organisations such as MAV, to unite against Government ill-conceived impositions,
 - Recommend that Nillumbik locates all illegal accommodation and provide retrospective permits by enforcing building codes to bring illegal accommodation up to code. This can have the triple benefit of removing illegal accommodation, improving the rate base, and coming part way to meeting the State Government housing objectives.
- ResCode concerns include, but not limited to:
 - Removal of third party rights
 - Proposed removal of neighbourhood character objectives and standards
 - Proposed changes to building setbacks, site coverage, building heights.

- Deer control:
 - Remain committed to the Peri-urban Deer Control Plan.
 - Encourage the use of the app FeralScan to monitor deer activity and movement.

In conclusion:

We thank the Nillumbik Shire Council for this opportunity to comment on the draft Council Plan 2025-2029. We support the document as presented, having made some comments and recommendations for further considerations in both this document and the online survey.

We congratulate all those involved in the formulation of this Draft and look forward to seeing the final endorsed document when it is released.

Regards



Lynlee Tozer
Vice President
Green Wedge Protection Group

nillumbikgwpg@gmail.com

Green Wedge Protection Group c/o Smiths Gully Post Office 3760

Draft Asset Plan 2025 – 2035 09.07.2025

“...effective asset management is the way that those tangible assets are managed and evaluated in such a way that they continue to deliver the services that the community needs and expects to be delivered in an effective economic way, made to last and perform at their best.”

Is the Draft Asset Plan essentially a catalogue of all the documents that relate to Council Assets with a very brief analysis of what each document presents as key findings?

In preparing this review and providing comment we asked ourselves how does this document benefit the Community and help Council make informed decisions?

Just randomly looking at the section “Council Requirements for All Asset Categories”

- Under Documentation, a specific document is referred to. It would be beneficial to **state the date of every endorsed Council document referred to.**

For example, Eltham Lower Park Masterplan, the date for this endorsed masterplan is 2008 this is currently missing from the Draft Asset Plan.

Next to the documentation listing for Eltham Lower Park Masterplan the heading Requirements is provided, with noted relating to ELPM .. *“Provides a strategic direction for the future development of the park by establishing a priority works plan to meet the needs of Council, permanent tenants and casual visitors.”*

If you actually look at the physical Eltham Masterplan document it does not actually meet any of the above requirements. This document does not reference any other current document relating to important issues such as climate change etc and this is due to the fact it is simply out of date. The document is so broad and high level that it is not referred to in relation the recent / current / in progress 2 million dollar upgrades that are occurring within Eltham Lower Park Currently.

- The key point is, by stating the date of each document referred to in the draft asset plan we can immediately see that we are basing a 10 year Asset strategy around documents that are significantly out of date.
- The question is **how many other Council documentation reports are referred to that are also significantly out of date.**
- By **identify all the information gaps** (out of date documentation plans etc – that are not of a suitable standard and quality of information expected and required to make informed decisions) The itemisation of gaps of information would be useful to qualify for every Asset topic and could be presented as a series of Action Items that would require corresponding funding to address and make relevant.
- **How could the Draft Asset Plan 2025 – 2035 address areas such as innovative solutions?** This 10 year time frame is critical to making a significant contribution in relation to a number of pressing issues such as mitigating impacts of a changing climate. It is essential that the entire Council workforce is on the same page together and looking to innovative solutions to review and implement asset plans going into the future.

- **Every topic is compartmentalised and reviewed in isolation.** We find this is a very simplistic approach that really hinders the need for action now, and the adaption an up take for applying and testing innovative solutions. Open Space is separate from Drainage is a particular point in question that we find glaring example of the disconnected approach to asset management. It would be prudent for Council to get up to speed in current modern day, best practise approaches to managing assets to *“deliver the services that the community needs and expects”*.
- Draft Asset Plan 2025 – 2035 reads like it is **rolling out a ‘business as usual’ approach**, and we have not been in a ‘business-as-usual’ situation for some time now. We understand the Shire of Nillumbik has made an *“official Declaration of a Climate Emergency”*. This does seem to be a critical lens to view all approaches through.
- We believe more work needs to be done to see how asset areas overlap and require a collaborative approach, within Council from the ground up. Council should move to a diagrammed format that show the how relevant asset areas over lapping. This diagram could also demonstrate the adaption of new innovative approaches that are currently occurring and planned for future projections. The approaches would also reference all the up-to-date relevant reports, studies and documents in a hierarchical system so that everyone can see how the directions and actions have been informed and made. We understand many people working within Council are highly motivated and knowledgeable yet feel let down by senior management due to their lack of rigor, enthusiasm and risk adverse attitudes stifling innovation. We would be really excited to see support for practical high quality innovative thinking planning and application to get down to the work required for mitigating impacts of a changing climate. This is the key factor and issue for all Plans Council is compiling currently.

Many thanks for the opportunity to review Nillumbik’s Draft Asset Plan 2025 – 2035
Thank you

[Redacted Signature]

Unique ID	Submission	Officer response
1496	I find it objectionable that a service fee needs to be paid when requesting an outcome from the council. Council pays employees to do a job and then I need to pay extra to get an outcome. I.E. if I need to cut down a tree that is dead (confirmed by an arborist) I need to fill in a form and pay a fee for the council officer to say yes. My rates payes for the council employee to do a job. So why am I paying twice to get an outcome	<p>Thank you for your feedback. We acknowledge your response and appreciate you taking the time to review the document.</p> <p>We strive to apply an equitable and consistent approach in managing public resources and services, ensuring fairness for all ratepayers across the municipality. While general rates fund a wide range of community services, specific application fees help cover the direct costs of assessment and ensure compliance with regulations. This approach ensures fairness by making sure individual services are funded by those who use them, rather than by all ratepayers.</p>

<p>1545 Friends of Nillumbik Inc</p>	<p>Please refer to submission attached – Attachment 2.1</p>	<p>We note that submissions to the Budget 2025-2026 were considered at the 13 May 2025 Planning and Consultation Committee meeting, however we do acknowledge the time and effort taken to review the budget and associated strategic documents and thank you for your contribution.</p> <p>Growth Assumptions and Revenue Forecasting The budget currently assumes an annual increase of approximately 130 new properties, consistent with recent historical growth trends. We acknowledge your concern that this assumption may underestimate future housing growth in light of State Government housing targets. At this stage, Council has taken a cautious and conservative approach, pending further clarity and confirmation on how these targets will be implemented locally.</p> <p>We agree that, over time, increased housing growth will generate both additional rate revenue and increased demand on services and infrastructure. Future budgets will incorporate adjustments as further information becomes available. We note your point that more explicit modelling of growth scenarios could enhance transparency and better inform community understanding of future financial planning, and we will take this into consideration for future budget development.</p> <p>Detail on Expenditure Changes We acknowledge the concern regarding limited detail provided in the budget documents about changes in expenditure, particularly for large line items. The format of the budget is based on the State Government's Local Government Model Budget framework, which standardises how councils present financial data.</p> <p>While this format ensures compliance and comparability across councils, it does have limitations in terms of granularity. However, we agree that improved accessibility and transparency of financial data, such as comparative year-on-year figures and breakdowns of significant projects or programs, would help stakeholders provide more meaningful input. Council is actively reviewing ways to improve the presentation of future budget documents and supporting materials.</p> <p>Funding for Environmental Strategies and Implementation We acknowledge the important role of the Green Wedge Management Plan 2019, the Biodiversity Strategy 2024–2034, and the Urban Tree Canopy Strategy 2024–2040. These strategies form a critical part of Council's long-term environmental and sustainability commitments.</p>
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		<p>While the 2025–2026 Budget includes increased allocations to Parks & Reserves and Environment & Conservation, we acknowledge that it does not explicitly identify or tag funding aligned to the implementation of these specific strategies. Council will review how it recognises and reports funding aligned to key strategies in future budgets and reports.</p> <p>Additionally, we are continuing to develop implementation plans for both the Biodiversity Strategy and Urban Tree Canopy Strategy, and aims to more clearly align future budget lines to those actions. Resourcing of key actions, including invasive species control, revegetation, and tree canopy protection, is under consideration as part of Council's operational budget review processes.</p> <p>Allocation to Environment in Overall Budget In response to your query about the proportion of the total budget allocated to environment-related initiatives, we are currently preparing more detailed internal reporting to clarify and communicate this breakdown. While environment-related expenditure spans several service areas (e.g., Environment & Conservation, Parks & Reserves, Planning, and Waste Management), we acknowledge that a clearer summary would enhance transparency.</p> <p>Service Performance Outcome Indicators Your feedback on the absence of environment, biodiversity, and climate action performance indicators in the budget is noted and appreciated. You are correct that the indicators published in the budget are based on the mandatory set provided by Local Government Victoria and currently do not include environment-specific measures.</p> <p>We agree that this is a limitation. While we are required to report against the existing Local Government Victoria framework, we also recognise the importance of developing and reporting meaningful local indicators that reflect our strategic environmental goals and progress. Council will explore options to:</p> <ul style="list-style-type: none"> • Develop and publish internal service performance indicators aligned to key environmental strategies. • Advocate to Local Government Victoria for the inclusion of environment-related indicators in the standard set used across councils. • Work with relevant stakeholders to define robust and measurable indicators that can track outcomes such as
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		<p>biodiversity improvement, tree canopy coverage, and climate adaptation.</p> <p>Capital Replacement and Renewals Funding</p> <p>We acknowledge your concern about long-term funding for capital replacements and renewals. While the 2025–26 allocation is adequate and aligns with planned works, the 10-year financial plan shows a funding gap that is indeed reliant on securing external grants and funding commitments.</p> <p>We regularly review our long-term financial strategy to ensure infrastructure and asset renewal needs are met, and that asset condition and service levels are sustained.</p> <p>We share your view that community expectations for safe, functional, and well-maintained infrastructure must be a priority. This will continue to be a key factor in annual capital works prioritisation decisions.</p> <p>Your submission and suggestions put forward will be considered in the development of future budgets.</p>
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1547	Please refer to submission attached – Attachment 2.2	<p>We note that submissions to the Revenue and Rating Plan 2025-2029 were considered at the 10 June 2025 Planning and Consultation Committee meeting, however we acknowledge and thank you for the time and effort taken to review the plan and associated documents.</p> <p>Context, Purpose and Format of the Plan We acknowledge the observation that the Revenue and Rating Plan is a legislated document, prepared in accordance with the Local Government Act 2020 and associated guidelines from Local Government Victoria. While this structure ensures consistency across councils and compliance with state requirements, it does present limitations in terms of depth and narrative.</p> <p>We agree there is value in going beyond compliance to provide a clearer articulation of the strategic and financial context in which the revenue and rating decisions are made and will consider your feedback when reviewing future iterations of the Plan.</p> <p>Absence of Expenditure and Broader Financial Context We agree that while the Plan focuses on revenue sources, it offers limited insight into how this revenue relates to expenditure or strategic priorities. The Revenue and Rating Plan is not intended to duplicate the detail of the Annual Budget or the 10-Year Financial Plan and as such does not offer the same narrative connection between revenue decisions and future expenditure pressures.</p> <p>Assumptions Behind Rate Increases The assumed 3.00% annual rate increases reflect the estimated annual rate cap under the State Government's Fair Go Rates System, and are used as a base for long-term financial modelling. However, as you point out, Council is not required to adopt the full cap each year and has in the past applied increases below the cap.</p> <p>We agree that future versions of the Plan could include greater explanation of the rationale for these assumptions, as well as discussion of the potential for variation based on emerging financial conditions, community sentiment, or changes to State policy.</p> <p>Waste Charge Increases and Cost Justification You have raised a valid concern regarding the uniformity of the proposed increase across different waste service charges. This increase is based on Council's overall waste service cost forecasts, which reflect rising contractor, transport, and processing costs.</p>
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		<p>Equity Considerations and Rating Differentials Your submission raises important questions regarding rating equity and the rationale for differentials such as those applied to farmland and vacant land.</p> <p>Council's current differential rating structure is based on a combination of historical precedent, policy intent, and community feedback. The farmland differential recognises the importance of supporting agricultural activity and reflects a view that farmland contributes to landscape and environmental values with lower service consumption.</p> <p>However, your points regarding the tax deductibility of farmland rates and the need to periodically reassess the rationale for differentials are well taken. Council is committed to ensuring that rating differentials remain fair, transparent, and fit for purpose, and we will take your comments into account during the next review of differential rate categories.</p> <p>Vacant Land Surcharge and Land Banking Disincentives We recognise the use of the vacant land rate differential as a tool to discourage land banking and support housing growth targets. Council acknowledges that under the State Government's housing plans, Nillumbik is expected to accommodate over 3,000 additional dwellings by 2046, and that planning and rating levers must work in concert to achieve this.</p> <p>The vacant land differential is intended in part to encourage timely development. We will give further consideration to whether this rate could be increased, in a way that balances housing supply objectives with fairness and viability for landowners.</p> <p>Your suggestion to explore a Betterment Levy on re-zoned land is noted. While this would likely require a broader legislative or policy shift at the State level, Council is supportive of mechanisms that capture the value uplift from planning changes to fund infrastructure and community benefits. We will continue to advocate for appropriate tools to support housing and land use outcomes in line with community expectations.</p> <p>Data Alignment and Accuracy Thank you for highlighting the discrepancy between the 2025–26 data in the Revenue and Rating Plan and the adopted budget. The figures used are captured at a point in time, using data available. At the time drafts of both documents were prepared, the Valuer General Victoria had not finalised the valuations of properties across the Shire and as such the final rate in the dollar was unable</p>
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		<p>to be calculated. In instances where this timing discrepancy occurs, a small footnote is inserted into the document noting this until the figures can be updated.</p> <p>We also acknowledge the incomplete update of monetary fee unit information and CPI references in the document. Updates do occur post adoption to the extent possible, in the interests of providing accurate and current information.</p> <p>Need for Greater Strategic Context We appreciate the broader point you raise about the need for this Plan to present not only revenue strategies but also a sense of Council's broader direction and financial intent — particularly in the face of growth, climate resilience, infrastructure aging, and community expectations.</p> <p>While this document must comply with prescribed structures, we will consider incorporating a clearer summary of long-term strategic pressures and how the rating and revenue strategies align with the Council Plan and Financial Plan in future editions.</p>
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1552	Please refer to submission attached – Attachment 2.3	<p>Thank you for your detailed submission to the Draft Financial Plan 2025–2035.</p> <p>Targets for Financial Policy Statements You raise a fair question about the basis for the financial indicators presented in the Plan and the importance of understanding whether they are actively justified or simply inherited. We can confirm that the indicators are drawn from a combination of legislative requirements, professional standards, and sector benchmarks, particularly from the Local Government Performance Reporting Framework (LGPRF) and the Victorian Auditor-General's Office (VAGO). These targets are reviewed periodically by Council in the context of our financial strategy, and are not simply passed down unexamined.</p> <p>While your suggestion to provide detailed historical data (10–20 years) for each indicator is well-intentioned and could help illustrate variability, we also note some limitations. In particular, long-term financial environments change significantly over time (e.g. changes in accounting standards, rate capping, COVID-19 impacts), and backward-looking data may not always provide a reliable guide to current or future risk.</p> <p>The provision of some summary trend information exists within Council's annual report and offer useful context, particularly for key indicators such as the Current Ratio. These outcomes are presented in a manner that enhances the narrative and risk assessment in the context of both historical and projected data.</p> <p>Budget Projections and Use of CPI Long-term financial projections involve uncertainty and assumptions, and that the further out the projection, the more these resemble high-level estimates based on inflation and trend modelling. This is a limitation shared by all councils and is a known feature of 10-year financial planning as required by the Local Government Act 2020.</p> <p>There is a underlying thought that the value of these forward estimates lies not in their precision, but in their ability to flag structural issues and long-run sustainability trends. While projections beyond Year 2 are not operational budgets, they are critical for ensuring future commitments, particularly asset renewal, debt servicing, and capital planning, can be met without compromising service delivery.</p> <p>Your critique of CPI-based projection methods and the potential for “money illusion” is well taken. We agree it is useful to remind stakeholders that nominal growth does not equate to real growth.</p>
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		<p>However, most readers have a high-level awareness of this, and CPI-based projections are a standard and broadly understood convention in public sector financial planning. Presenting both real and nominal figures may add complexity that not all readers find useful, and could risk confusion.</p> <p>Population Growth and Asset Pressures Council's long-term planning does incorporate population growth forecasts and associated impacts on infrastructure and service delivery, including through the Asset Plan.</p> <p>While it may not be immediately obvious in the Financial Plan, these projections inform underlying assumptions — such as capital expenditure, operational costs, and asset renewal requirements. That said, we acknowledge that the connection between growth forecasts and financial projections could be more explicitly drawn out in the narrative and will look for opportunities to reflect this when finalising the document.</p>
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Friends of Nillumbik Inc.

P.O. Box 258 Eltham 3095

mail@friendsofnillumbik.org



Submission to Participate Nillumbik in response to draft Council Plan 2025-29

Friends of Nillumbik Inc. (FoN) provides this written submission in response to Nillumbik Shire Council's (NSC) invitation to provide feedback on the draft Council Plan 2025-2029.

Summary Response

FoN extensively supports the draft Council Plan 2025-29 (the Plan) and is encouraged by the more robust plan engagement and development processes applied to this Plan.

We support the Message from our Councillors, including its valuing of Nillumbik's environment, including *'protecting local waterways, sustaining our urban tree canopy, and conserving biodiversity'* as being *'essential to long-term liveability and environmental wellbeing'*. We also note and support emergency preparedness and response, along with improved road safety and public transport. We think that this message should also be recognise current threats that Council must attend to, primarily the State Government's housing targets and the need for Council to engage effectively with the community to protect neighbourhood character inform housing diversity and planning amendments.

We support the Vision Statement and, although developed by a previous Council, is still relevant and appropriate for the foreseeable future of Nillumbik.

Themes summary comment.....

Timing of the Plan

We understand this Plan will only be effective from July 2026 onwards, approaching halfway through this Council's term, with the Council Budget 2025-2026 already approved and fundamentally drawn from the previous Council's priorities. The Council Plan should be developed earlier to reflect the current Council makeup and inform the first full year budget in a Council's term.

Theme 1 – Our people – inclusive living and participation

We agree with the majority of the strategies and priority actions under this theme, and suggest some improvements:

- Reflecting on our past experience in making written and verbal submissions to Council on many issues, and that few of these have resulted in any improvement to the subject draft Strategy or Plan, we suggest an increased commitment by Council as follows, in addition to **Priority Action 1e)** or as a separate point: *'Ensure inclusive participation in*

decision-making by actively considering community input through Participate Nillumbik including submissions and presentations to Council.'

- The strategic indicators for this theme are limited and cover few of the proposed strategies and actions. A much improved set of indicators is needed, considering which strategies and actions are most important to delivery of the theme objective and on which Council may have a larger influence. For example, strategic indicators could include: proportion of mothers and babies involved in maternal health services; proportion of child population fully immunised; number of ageing in place homes; or perhaps some of the key indicators proposed in the Nillumbik Health and Wellbeing Plan 2025-2029.

Theme 2 – Our place – Livable and connected communities

The shared vision is appropriate and reinforces the importance of the Green Wedge and our natural environment and biodiversity. However, the title of 'livable and connected communities' and the objective appear to focus entirely on the built environment.

We would suggest an addition to this objective to include: **'We value our Green Wedge and protect and enhance its natural environment and biodiversity.'**

We agree with the majority of the strategies and priority actions under this theme, and suggest some improvements:

- Given the critical nature (both a threat and an opportunity) of the State Government housing targets to Nillumbik's distinctive neighbourhood character and environment, indeed its essence, significant attention should be given to this issue. We suggest **Priority Action 2a)** should be much stronger, for example: *'In response to State Government housing targets (additional 6,500 new dwellings by 2050), **strenuously seek to secure** housing and planning reforms that protect local neighbourhood character **and Nillumbik's unique natural environment.**'* Similarly for **Priority Action 2b)** *'Update and finalise the Nillumbik Housing Strategy to **secure** diverse housing options near transport hubs and within our activity centres and townships to create connected, sustainable communities that support our community to 'age in place'.'*
- Priority Action 2l) is a welcome addition, except that to simply seek to prepare an issues and options paper over the next four years is inadequate. Council cannot meet its current operational obligations for management of nature strips and roadside planting, a high proportion of properties do not comply with the current Local Law, and Council is incapable of enforcing it. We suggest an amended **Priority Action 2l) 'Review current Local Law and rules, and develop and implement guidelines regarding nature strips and roadside planting that prioritises indigenous species, **reduces invasive species and increases biodiversity.**'**
- Priority actions under sub-theme **Protection of Biodiversity** are totally inadequate. The Message from our Councillors, as referred to above, stresses the importance of the environment and biodiversity in Nillumbik, but this importance is not reflected in this sub-theme. Indeed, the specifics associated with environment and biodiversity are insignificant when compared with, for example, the listing of projects under Priority Actions 2u), 2v) and 2w). Far more attention (and funding) is given to dog parks,

recreational trails and BMX parks than to the environment. One of the primary objectives of the Biodiversity Strategy is to arrest the decline of biodiversity in the Shire, but there is no hope of that with current funding and lack of more specific priority actions and strategic indicators. Significant additions to **Priority Action 2q** is warranted, and we suggest a selection of the following actions from the Biodiversity Strategy be adopted (some of which may be already included in the Implementation Plan, but we are not privy to this document):

- *Implement and enforce Council's regulatory tools that support biodiversity protection.*
- *Increase the conservation values (e.g. restoration and improved connectivity) of Council's reserves, wetlands and roadsides.*
- *Determine where there are opportunities for new or replacement planting in parks, reserves, activity centres and along urban streets; and implement a long-term planting (and tree maintenance) program.*
- *Seek investment and commitment from all levels of government and other funding bodies to help monitor, protect and enhance the Shire's biodiversity.*
- *Identify opportunities for Council and the community to participate in training, programs and initiatives that Care for Country and build cultural awareness with Traditional Owners.*
- *Identify opportunities to enhance the condition, extent, connectivity and function of indigenous vegetation and ecosystems (terrestrial and aquatic) across the Shire — including through collaborations, investigations and targeted projects.*
- *Manage Council's 100+ bushland reserves and wetlands, and vegetation along Council roadsides, with available funds targeted in a strategic manner.*
- *Undertake and seek opportunities to monitor the distribution, abundance data and ecological information of Nillumbik's species and communities to help inform priority actions to prevent local extinctions.*
- *Work collaboratively to support the implementation of recovery plans for threatened species and ecological communities.*
- *Implement a biosecurity approach to guide the prioritisation and management of invasive species on Council land and seek opportunities to increase budget.*
- *Apply a landscape scale approach to reducing the presence of invasive species across all land tenures.*
- *Preserve high-quality fauna habitats and improve connectivity of habitat through restoration and invasive species management.*
- As with Theme 1, the strategic indicators for Theme 2 are limited and cover few of the proposed strategies and actions, and **none** relate to environment and biodiversity. We suggest inclusion of the targets or important indicators from the Biodiversity Strategy, such as: Net gain in extent of native vegetation (based on Ecological Vegetation Classes). Measured by Victorian Government approximately every 10 years; zero new local extinctions; improved condition of habitat in Council bushland reserves, based on an adapted habitat hectares assessment at point locations (with each reserve assessed every three years on a rolling rotation).
- Under **Services We Deliver**, we note that **Open Space Management** includes 'reserves and roadsides' along with parks, sportsgrounds and street trees. To improve transparency of actions and budgets, we suggest the services associated with reserves

and roadsides with their specific environmental objectives and their attendant budgets, be separated from other open space services.

Theme 3 – Our Future – Sustainable futures and healthy environments

We agree with the majority of the strategies and priority actions under this theme, in particular those associated with local climate action, and suggest some improvements:

- The inclusion of Open Space reserves and roadsides services and the implementation of the Biodiversity Strategy in Theme 2, while environment and conservation services (with references to bushland reserves and biodiversity) is included in Theme 3, is confusing. For transparency and clarity, we suggest Council reconsider how and where these categories of services are placed in the Plan.
-

Theme 4 – Our Council – Responsible governance and community leadership

We agree with the majority of the strategies and priority actions under this theme, and suggest some improvements:

Budget submission.....

However, we register some concerns with the budget, and the lack of detail on proposed expenditure, as follows:

1. The budget is based on a primary assumption of zero growth in NSC service capacity, and the 3.00% increase in rates is caused by cost increases (inflation) alone. There appears to be **no or minimal allowance for any housing/rateable property growth** which would affect forecast revenues and expenditure through increased demand for services. **This shortcoming gives an inaccurate and potentially misleading view of the budget projections and should be addressed.**
2. There is **insufficient detail** in the budget document to ascertain where changes to expenditure are proposed, especially for large expenditure items. A request to NSC for this information, and for trend information over time, elicited no further details. **It is difficult to review and provide meaningful comment on the budget without this information.**
3. While there appears to be an increase in expenditure for Parks and Reserves Maintenance and Environment and Conversation, there is no specific mention of the critical actions or expenditure relating to the Green Wedge Management Plan 2019, the Biodiversity Strategy 2024 or the Urban Tree Canopy Strategy 2024-2040. **Specific mention and budget allocations to these strategies are necessary.**
4. There are **no service performance outcome measures relating to environment, biodiversity and climate action**, despite monitoring and outcome performance being

integral to commitments in these various strategies. **Appropriate service performance outcome indicators are requested for these items.**

5. Allocation of funds to capital replacements and renewals is below desired levels of funding over the forecast 10-year period. Council could potentially fund some of this shortfall through its operating surpluses and increasing cash reserves to maintain infrastructure and facilities to their required service levels.

Notes: What % of funds go to the environment???

Housing Strategy an important action

Many action areas. Difficult to allocate funds across all areas.

Specific Comments on draft Budget 2025-26

1. Expenditure for Environment, Biodiversity and the Green Wedge

As some limited examples of the commitment of NSC to the environment and biodiversity:

- The Green Wedge Management Plan 2019 (GWMP) states in its Vision: *‘Management of the Nillumbik Green Wedge will **lead the way** [our emphasis] in supporting a vibrant, resilient, connected and diverse community; living in the landscape to enhance the environmental, social and economic sustainability of Nillumbik’s green wedge. Council will ensure that the natural environment of the green wedge is preserved and nurtured for current and future generations. ... Harnessing the shared values of our community and supporting their commitment to managing the green wedge will be the key objective over the 10-year lifetime of this plan.’* Further, the Monitoring and Evaluation section of the GWMP states: *‘Annual implementation plans will be prepared and reported on through Council’s annual planning, budgeting and reporting processes. **Expenditure and activity associated with this plan will be tagged in Council’s public budget** and performance statements to inform the community on its progress.’*
- The Biodiversity Strategy 2024-2034 in its Supporting Strategies included: *‘Embed delivery of the Biodiversity Strategy within the CEO’s contract / performance plan.’*, as well as commitments to allocate time and resources to the Strategy that reduced the presence of invasive species, encourage revegetation and restoration of reserves and roadsides, supporting landholders in managing biodiversity, protect threatened species, etc.
- The Urban Tree Canopy Strategy, similar to the above, proposes that funding for its initiatives will be considered in Council’s annual budgeting process. Importantly, it includes a range of initiatives that include: developing a Tree Inventory; developing and implementing an Urban Tree Maintenance, Planting and Renewal Plan; and implementing the Local Law and other actions to reduce and eliminate non-permitted clearing / removal of trees from Council and private land.
- The Council Plan Quarterly Performance Report 2024-25 – Q2, reported that *‘No funding is allocated to the implementation of the Green Wedge Management Plan (GWMP) as a ‘stand-alone’ initiative in the 2024-2025 financial year, therefore actions must be funded through grants or allocation to projects that support the actions.’* Similarly, this report

made commitments to address The Year 1 Biodiversity Implementation Plan (2024-25) and the Year 1 Key Urban Tree Canopy Actions (2024-25) in 2025.

- The current level of funding for programs such as invasive species control on both private and Council land, management of roadside reserves, and arresting declining biodiversity are totally inadequate.

It is a **significant omission** in the budget that there is no explicit funding or indeed even a mention, of these strategies, given their stated importance to the community and the clear NSC commitments to their budgetary consideration. **Further, the budget allocations appear to be insufficient to deliver on environmental and biodiversity commitments.**

2. Service Performance Outcome Indicators

Given the apparent emphasis in the budget document and apparent budget allocations relating to environment, biodiversity and climate action, it is incongruous to find that there are precisely **zero** service performance outcome indicators for these items. This appears to be a serious shortfall. Many potential measures and suggested targets are proposed in the relevant strategy or plan documents, but none have found their way to the budget. Eg, Achieving a net gain in the extent, connectivity and condition of habitat. We understand that the indicators included in the budget are a standard set developed by Local Government Victoria for all councils.

We consider this inadequate. NSC should develop appropriate indicators and targets to reflect actions and commitments to the environment, biodiversity and climate action.

These indicators may also be appropriate for other councils and could be developed in conjunction with Local Government Victoria.

3. Capital Replacements and Renewals

Allocation of funds to capital replacements and renewals appears sufficient in the 2025-26 year, but is well below desired levels of funding over the forecast 10-year period, especially capital replacements. The budget states that Council is reliant on external funding sources to achieve the desired outlays, which it appears has been met for 2025-26. We are concerned that a funding shortfall in the projections will result in a deterioration in infrastructure and facilities. Could Council potentially fund some of this shortfall through its operating surpluses and cash reserves, or find a more reliable way to gain an external funding commitment?

We ask: Does our community want Council to have cash in the bank or roads with fewer potholes and facilities that are safe? We certainly do.

We look forward to presenting our submission to the Planning and Consultation Committee.

Thank you.

Sincerely,

Don Vincent (President)

Friends of Nillumbik Inc.

mail@friendsofnillumbik.org

7th July, 2025

Nillumbik Council: Draft Revenue and Rating Plan 2025-2029

The following comments are based on the Draft Revenue and Rating Plan 2025-2029 which underpins the Council's Financial Plan and, therefore, all of Council's other plans.

"The purpose of the Revenue and Rating Plan is to determine the rating and revenue strategy which, in conjunction with other income sources, will adequately finance the objectives proposed in the Council Plan."

Like so much of what Victorian councils do, this draft revenue and rating plan is mandated by the Victorian Government which probably even provides councils with a proforma to use. It's understandable therefore, that busy council officers frequently adopt a box-ticking approach to such tasks.

Even so this draft plan is an inadequate skeleton devoid of all muscle.

The document includes a pie chart on budgeted income for 2025-26, but why nothing on expenditure when revenue and spending need to be related to each other to add any meaning to the revenue plans and to understand council finances. And while on spending, where is the necessary discussion of the implications of expected or planned spending on the maintenance, improvement and extensions of Nillumbik's infrastructure which will increase with the growth in population and dwellings indicated by the Government.

Sure, it's a revenue and rating plan but such a plan is irrelevant without some cost information and some vision about what Council aims to do in future.

Apart from the information on rates increases since 2021-22 why is all the statistical information truncated on 2025-26? If it is the implicit assumption that assumed and projected future values are presented in the Budget 2025-26, why not – to help better and more easily inform readers – is there not at least some summary of the Budget projections.

[As an aside on the Budget projections, anyone with even cursory experience of forward budgeting will acknowledge that it is only the current and next year that have any practical relevance because after that these exercises become nothing more than aimless reverting to trend straight-line projections. Still, the revenue plan needs to be seen in context.]

A serious omission is the lack of any substantive explanation or rationalisation of the various assumptions.

There is no explanation of why the uniform 3.27% increases across the range of waste service charges are necessarily relevant to the future. If the Plan is to charge user fees in keeping with costs, is it necessarily the case the cost increases for 2025-26 are uniform across these service categories and that that uniformity is "future relevant".

According to the Plan document: “In council’s view the proposed revenue and rating strategy puts due emphasis on equity”.

What equity trade-offs are implied, for example in relation to the discounts and premiums over the standard household rate based on CIV?

And: “The budget projections have been prepared on the basis of a 3.00 percent rate increase in 2025-2026 followed by increases of 3.00 percent in each of the following years.”

Why? This is a convenient assumption. But councils can choose to impose rate increases smaller than the allowed maximum, as has happened in Nillumbik on at least two occasions. Moreover, there is nothing to prevent councils lowering rates and they can even increase rates by more than the Fair Go Rating System amount, provided they can make a good case for that.

What are the sources and reasons for the discounts and premia on the basic household rate. Have these details just emerged from the ancient mists of times past or is there some rationale for why, for example, the unit rate on farmland should be 15 percentage points lower than the general rate. After all farmland appears to be defined as land **actually being used for farming**, so presumably the rates are tax deductible which they are not for urban householders.

Under the State Government’s plans, Nillumbik will need to provide over 3,000 more dwelling spaces in the years to 2046, an increase of 14.5%. This growth would be facilitated by significantly reducing the incentives for land banking. According to Nillumbik’s Asset Plan 2022-2032 “Population growth [and growth in the number of dwellings] will be mostly supported by green-field developments resulting in a greater number of new road and footpath assets being gifted to Council, leading to increased maintenance costs in the future.”

To achieve the increase in the number of dwellings, Council will have to address land banking by disincentivising the practice.

One way of doing that would be to significantly increase the rate surcharge for vacant land. Some simple modelling based on the 2025-26 data suggests an increase in the rates surcharge for vacant land could be used to reduce the pressure on general rates while still keeping the rates increase to around a weighted average of 3%.

Such a realignment of the rates structure is completely within Council’s remit.

Council might also consider charging a “Betterment Levy” on re-zoned greenfields land, which, just like an increased rates premium, would reduce the incentive for holding onto undeveloped land.

Aside from their probable self-interested political lobbying, landowners do nothing to warrant the huge increases in land values when land is re-zoned to permit higher value uses.

A Betterment Levy could be set at all of the increase in land value due to re-zoning or perhaps somewhat less to allow for the rates that have been paid over some period, say ten years, or since the most recent beneficial change of ownership.

Finally, two points about some statistical sloppiness and inadequate information.

First, the data in the table below show discrepancies between the numbers shown for the year 2025-26 in the Draft Revenue and Rating Plan and the numbers in the adopted budget for 2025-26 – the data in the Draft Revenue and Rating Plan shown as being for 2025-26 are actually the numbers for the year before, 2024-25.

The differences are minor but as the Revenue and Rating Plan appeared AFTER the budget, surely somebody should have incorporated the latest correct figures for 2025-26.

Second, the Revenue and Rating Plan refers to the schedule of fees and charges attached to the 2025-26 budget. In that schedule fees for some items are shown as “monetary fee unit” and for others as a dollar amount “+ CPI”. These descriptions are reasonable as far as the draft budget goes because the required information is not available at the time the draft is completed. Since then, however, the Victorian Treasury has released the monetary fee unit information – on 22 May. However, in terms of providing information for the Revenue and Rating Plan they are incomplete.

The final Budget was presented to and agreed by Council on 27 May, a week later – so time enough to update the information concerning the actual fees determined by the monetary fees unit system. The relevant CPI data would probably not have been available at that date.

	Budget 2025-26		Revenue Rating 2025-26
	Rates/CIV	Rates/CIV	Rates/CIV
	Actual 2024-25	Budget 2025-26	Draft Budget 2025-26
General	0.002378	0.002384	0.002378
Farmland	0.002021	0.002026	0.002021
Commercial/Industrial	0.002758	0.002765	0.002758
Vacant Land - Residential, etc	0.003551	0.003576	0.003551
Cultural and Recreational	0.000927	0.000930	0.000927



Nillumbik Council: Draft Financial Plan 2025-2035

Nillumbik's Financial Plan is an important document that helps underpin the Community Vision, the Council Plan and links to other planning matters governing the activities of Council. The Financial Plan is based on a number of management and performance principles listed in the Plan document.

To do its job the Plan has to provide information that convinces the Nillumbik community that in following the Plan the Council will be working from soundly based and provided information that helps to identify financial and other risks and opportunities facing the Council and Community.

I have two criticisms regarding the information provided in the Plan.

TARGETS FOR FINANCIAL POLICY STATEMENTS

The issue here should be **not** the "statements" **but** the outcomes.

The latter point aside, the published indicators seem reasonable enough at first glance. But the Plan should provide some explanation of the origins of and reasons for the various targets indicated. For example, have these details just emerged from the ancient mists of times past with the numbers being passed on without question from each Chief Finance Officer to his or her successor?

It would also be relevant to indicate how variable have been the historical outcomes across the indicators relative to numbers shown in the document. A time frame of at least ten years might suffice but a twenty-year time frame would be much better. Presumably Council has a readily accessible data base that includes such information

Such information would say a lot about the risks in achieving the desired outcomes.

As an example, take just the indicator Current Assets / Current Liabilities, with a target value of 1.5 and assume hypothetically that the projected values are actual historically recorded values and assume a Normal or Bell Curve probability distribution. Under those assumptions there is a 16% chance that the indicator will come in **under** its target and an equal 16% chance it will come in above target. The latter result is unlikely to be a problem, but the risk of the former possibility may be cause for concern.

BUDGET PROJECTIONS

Making budget projections running out for ten years – to 2034-35 in this case – represents a considerable task. The job has obviously involved both Council officers and councillors who from early in 2025 have had to make many assumptions and trade-offs involving many personal judgements in arriving at the draft Financial Plan.

Unfortunately, as presented the projections have little value in identifying risks and opportunities and informing Council decisions in the years to 2034-35.

As an aside on budget projections generally, anyone with even cursory experience of forward budgeting will acknowledge that it is only the current and next year or so that have any practical relevance. After those years such exercises usually become little more than reversions to more or less trend straight-line projections. That's understandable given officers and councillors can't know the future and are busy people.

However, that very common and routine procedure reduces the information provided by any budget, especially when so many of the projected values are based on a common assumption about the CPI driving the future values, as in this case.

The use of a common CPI assumption to drive future values raises the issue about money illusion. As defined by Investopedia: "Money illusion is an economic theory that suggests that people tend to view their wealth and income in nominal dollar terms rather than in real terms. Put simply, money illusion means that people don't account for inflationand wrongly believe that a dollar [tomorrow, say in ten years is worth the same as a dollar today – my edit]

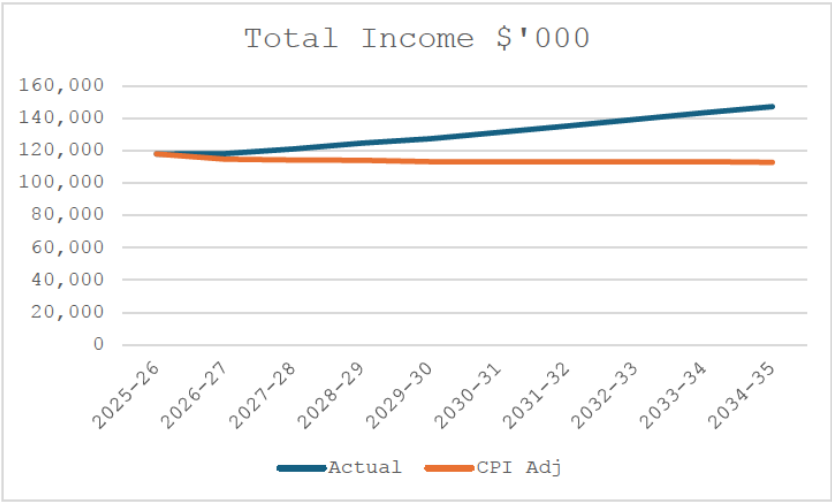
As a point of reference given a CPI growth of 3% annually, Having \$100 in ten years has an equivalent purchasing power of only \$76 today.

The Comprehensive Income Statement Forward Estimates in the Council's Financial Plan can be used to illustrate the point by taking the standard CPI inflator of 3.00% **out of the numbers**. The **actual or nominal** values shown in the Plan and the **deflated or real** Total Income data are compared in the figure below.

When adjusted for inflation the real purchasing power of future total income **does NOT rise but FALLS** over the projection horizon.

That means we will not be able to do as much with the future income as we can with the income in 2025-26.

And that problem for service delivery is probably more serious than indicated below because the Plan seems to make no account of the increase in Nillumbik's dwellings and population demanded by the State Government. As a guide to the overall growth expected in the Shire, the latest projections by the Victorian Government indicate [updated 29 April 2025] increases of 5.1% and 7.3% respectively in the numbers of people and dwellings in Nillumbik in 2036 compared with 2026.



Moreover, according to Nillumbik’s Asset Plan 2022-2032 “Population growth [and growth in the number of dwellings] will be mostly supported by green-field developments resulting in a greater number of new road and footpath assets being gifted to Council, leading to increased maintenance costs in the future.” It is not clear whether those increases are allowed for in the budget projections.

9 July 2025.

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Draft Asset Plan 2025-2035

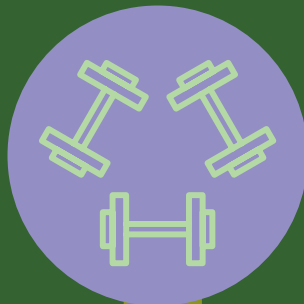
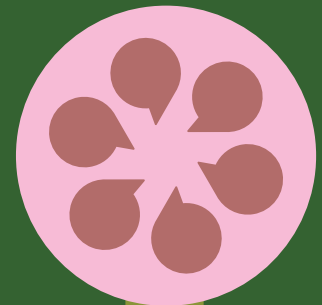
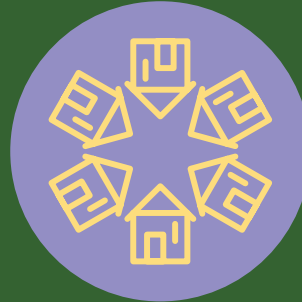


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Acknowledgement of Country

Nillumbik Shire Council respectfully acknowledges the Wurundjeri Woi-wurrung people as the Traditional Owners of the Country on which Nillumbik is located, and we value the significance of the Wurundjeri people's history as essential to the unique character of the Shire. We pay tribute to all First Nations People living in Nillumbik, give respect to Elders past, present and future, and extend that respect to all First Nations People.

We respect the enduring strength of the Wurundjeri Woi-wurrung and acknowledge the ongoing impacts of past trauma and injustices from European invasion, massacres and genocide committed against First Nations People. We acknowledge that sovereignty was never ceded.

Wurundjeri Woi-wurrung people hold a deep and ongoing connection to this place. We value the distinctive place of our First Nations People in both Nillumbik and Australia's identity; from their cultural heritage and care of the land and waterways, to their ongoing contributions in many fields including academia, agriculture, art, economics, law, sport and politics.

Glossary

Term	Definition
Accumulated Depreciation	Depreciation is the reduction in the value of an asset due to usage, passage of time, environmental factors, wear and tear, obsolescence, depletion or inadequacy. Accumulated depreciation is the total amount of that reduction in value of an asset from when it was first recognised as an asset to a given point in time.
Acquisition	The acquisition or obtainment of an asset through the purchase of the asset or any other means.
Asset	An item, thing or entity that has actual or potential value to an organisation.
Asset Management	The systematic and coordinated activities and practices of an organisation to realise the value of an asset.
Condition	Physical state of an asset.
Customer	Any person who uses the asset or service, is affected by it or has an interest in it either now or in the future. This definition does not necessarily require that payment is made for use of the asset.
Expansions	Extends the capacity of an existing asset to provide benefits to new users at the same standard as is provided to existing beneficiaries.
Financial Plan	The Financial Plan provides a long-term view of the resources that we expect to be available and how these will be allocated and prioritised over the next ten years.
Levels of Service	The parameters or combination of parameters that reflect social, political economic and environmental outcomes that the organisation delivers.
Operational & Maintenance	Actions required for retaining practical asset condition to deliver required function.

Term	Definition
Renewals	Works to replace existing assets or facilities with assets or facilities of equivalent capacity or performance capability.
Replacement Value	Cost the entity would incur to acquire the asset on the date that is reported. The cost is measured by reference to the lowest cost at which the gross future economic benefits could be obtained in the normal course of business or the minimum it would cost, to replace the existing asset with a new modern equivalent asset with the same economic benefits allowing for any differences in the quantity and quality of output and in operating costs.
Risk	The effect of uncertainty on objectives. Risk events are events which may compromise the delivery of the organisation's strategic objectives.
Risk Management	Coordinated activities to direct and control an organisation with regards to risk.
Upgrades	Capital works carried out on an existing asset to provide a higher level of service. This is different to renewal which restores an asset to its original condition.
Valuation	The process of determining the worth of an asset or liability. Assessed asset value which may depend on the purpose for which the valuation is required.
Written Down Value	The Gross Replacement Value of an asset less the Accumulated Depreciation, calculated on the basis of such cost to reflect the consumed or expired future benefits of the asset.

1. Introduction

Many of the services provided to the Nillumbik community are underpinned by different sets of physical assets that are required to be managed.

As custodian of these assets, Council has the responsibility of managing these assets in the most effective way, ensuring they are safe, fit for purpose and sustainable in the delivery of reliable services for current and future generations.

Council responds to this responsibility by managing all of the community's assets through their lifecycle: from creation and acquisition, through maintenance and operation to rehabilitation or disposal.

This Asset Plan provides a strategic and financial view of how Council will manage those assets over the next ten years. It defines high-level strategic asset management priorities and addresses all aspects of the lifecycle management of those assets.

Community feedback obtained through various surveys such as *Help Shape Nillumbik Now and Beyond* have influenced the development of this Plan.

1.1 What is an asset?

In the simplest of definitions, it is something that provides value.


There are two types of assets: tangible and intangible.

Tangible assets can be seen and touched, like roads, footpaths and ovals; intangible assets are non-physical in nature, but they can still be appreciated, their existence acknowledged - intellectual property being an example.


This Asset Plan deals with the tangible assets that Council owns and controls on behalf of the community like buildings, roads, playgrounds, sports fields, trails and drains.


These assets have been classified into four major categories:

Category	Assets included
Buildings	Civic centres, sports pavilions, libraries, neighbourhood house, recreation, community and leisure centres, public toilets
Drainage	Swales, open drains, underground pipes, pits
Open Space	Playgrounds, fitness parks, playing surfaces, trails, walkways, public and sporting shelters
Transport	Bridges, major culverts, car parks, footpaths, kerbs, roads

Buildings Portfolio	Quantity	Value	
Facilities	411 No	\$240M	
			\$240M

Drainage Network	Quantity	Value	
Surface Drainage	13 ha	\$5M	
Stormwater Pits	19354 No	\$65M	
Stormwater Drains	408 km	\$142M	
			\$212M

Open Space Network	Quantity	Value	
Playground & Fitness Parks	99 No	\$9M	
Trail & Walkways	89 km	\$16M	
Playing Surfaces	96 No	\$40M	
Public & Sporting Shelters	180 No	\$2M	
			\$67M

Transport Network	Quantity	Value	
Roads (Sealed)	487 km	\$138M	
Roads (Unsealed)	302 km	\$65M	
Footpaths	299 km	\$40M	
Kerbs	709 km	\$31M	
Car Parks	241 No	\$5M	
Bridge & Major Culverts	121 No	\$21M	
			\$300M

1.2 What is Asset Management and why is it important?

Asset management refers to the series of activities that, properly coordinated, monitor and maintain the value of these assets, and the services that these assets provide are efficient and welcomed by the community, over their entire lifespan.

Also, effective asset management is the way that those tangible assets are managed and evaluated in such a way that they continue to deliver the services that the community needs and expects to be delivered in an effective economic way, made to last and perform at their best.

2. Strategic Asset Management Framework

The diagram below shows the linkage between Council's strategic objectives and asset planning at the strategic, tactical, and operational levels. Council's asset management framework aims to ensure that a systematic approach to asset management delivers prudent and efficient outcomes to meet both community and asset management objectives.



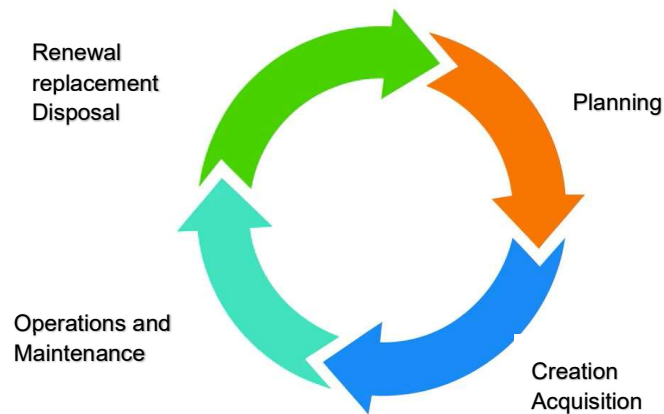
Document	Role
Community Vision	Describes the community's aspirations for the future. It helps council to understand the community's priorities, guides strategic planning and decision-making.
Council Plan	The Council Plan sets the strategic direction of the four-year Council term. It guides the organisation's work to deliver on priorities, manage and deliver services for the community during the Council term.
Financial Plan	A forecast view of the financial sustainability of Council over 10 years, outlining the financial resources necessary to implement the objectives and strategies of the Council Plan to achieve the Community Vision.
Asset Plan	Provides a high level strategic and financial view on how Council intends to manage its transport, building, drainage, and open space asset categories over the next ten financial years within compliance of the Local Government Act 2020.
Asset Management Policy	Provides a framework and direction for asset management by identifying Council's asset management objectives and tactics required to link them to organisational strategic objectives.
Asset Management Plan	Outlines the current state of Council's asset portfolio, asset management system and forecasts the improvements required to meet the level of service required by the community as described in the Council Plan and Asset Management Policy.

3. Lifecycle Management

The ultimate objective of an effective asset management system is to ensure that assets deliver the required level of service in the most cost-effective manner through their entire lifecycle. Key elements for this effective asset management are:

- Adopting a formalised asset management system with a life-cycle approach
- Developing cost-effective asset management strategies for the long term based on defined and agreed levels of service
- Monitoring performance
- Understanding the impact of the change on the community's service needs
- Managing risk associated with asset failures
- Continually improving asset management processes and practices

The asset management industry best-practice includes the following four key stages in the asset lifecycle:



3.1 Lifecycle Strategies

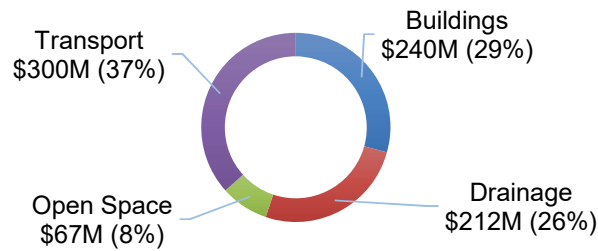
Each of these lifecycle stages has its own delivery activities. This delivery strategy includes Council's approach to ensure that each stage systematically and consistently achieves its own objectives.

Stage	Activities
Planning	<p>Needs assessments are conducted to ensure assets are fit-for-purpose and meet the service needs of the community.</p> <p>Future asset planning and service design consider and balance the key principles of affordability, equity and the environment.</p> <p>Council uses transparent, informed decision-making processes that consider the whole-of-life implications of acquiring, operating, maintaining and disposing of an asset.</p>
Creation / Acquisition	<p>Asset-creation projects are comprehensively defined so that their objectives are clear.</p> <p>Appropriate procurement strategies are designed to ensure we work with the right project partners and achieve value for money.</p> <p>We integrate environmentally sustainable approaches to the design and construction of assets.</p> <p>Newly acquired/created/adopted assets are checked for quality before they are put into service.</p>
Operations and Maintenance	<p>Assets are operated, inspected and maintained to ensure:</p> <ul style="list-style-type: none"> - They continue delivering the service they were designed for over their useful life - They are safe and compliant - The risk of critical asset failure is minimised - Their ongoing lifecycle costs are met <p>Through its Asset Management System, Council records the information on its assets and monitors performance.</p>
Renewal, Replacement, Disposal	<p>Council periodically assess the condition of its assets.</p> <p>We aim to optimise the timing of the renewal or replacement of our assets so that they remain safe and functional and to minimise overall lifecycle costs.</p>

4. Valuations

Council manages a significant portfolio of assets that have a replacement value of \$819 million as at 30 June 2024. This amount covers buildings, drainage, open space and transport assets.

The replacement value by category is:

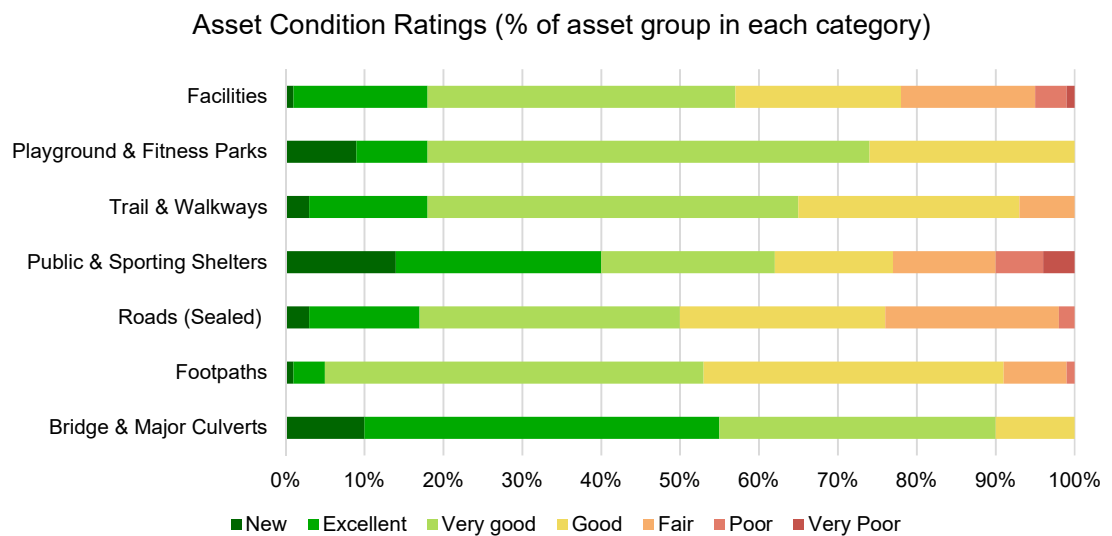


Assets	Replacement Value \$ (Million)	Accumulated Depreciation \$ (Million)	Written Down Value \$ (Million)
Facilities	\$240	\$86	\$154
Surface Drainage	\$5	\$5	\$0
Stormwater Pits	\$65	\$22	\$43
Stormwater Drains	\$142	\$54	\$88
Playground & Fitness Parks	\$9	\$4	\$5
Trail & Walkway	\$16	\$9	\$7
Playing Surfaces	\$40	\$11	\$29
Public & Sporting Shelters	\$2	\$1	\$1
Roads (Sealed)	\$138	\$46	\$92
Roads (Unsealed)	\$65	\$32	\$33
Footpaths	\$40	\$22	\$18
Kerbs	\$31	\$15	\$16
Car Parks	\$5	\$2	\$3
Bridge & Major Culverts	\$21	\$8	\$13
TOTAL	\$819	\$317	\$502

5. Current State of Assets

The constant use of these assets mean they deteriorate and get damaged over time; depending on their usage some more quickly than others.

To assess the level of deterioration and determine maintenance, replacement, renewal or expansion levels, Council has inspection regimes to ensure these assets can continue delivering services to the community. The standard to which they are maintained and the extent to which they are grown and improved are key considerations in setting and delivering on our Community Vision and Council Plan.



Condition Rating	Description
New	Brand new asset
Excellent	Fit for purpose, very low maintenance required
Very Good	Minor maintenance required in addition to programmed maintenance cycle
Good	Moderate maintenance required in addition to programmed maintenance cycle
Fair	Significant maintenance required. Capital renewal maybe required within the next five years
Poor	Significant renewal works required to restore the capacity and service levels, or extend the asset life
Very poor	End of asset life; no service potential

6. Levels of Service

Buildings

Category	Customer Values
Buildings	Buildings are accessible and have equal access for all users
	Buildings are fit for their intended purposes
	Buildings are safe for use and occupation

Category	Level of Service	Service Attributes	Service Standard	Delivery Mode
Buildings	Technical	Sustainability	• Provide buildings that are climate-considerate, water and energy-efficient and cost-effective	• Climate Action Plan
		Operation & Maintenance	• Buildings are maintained to meet service requirements	• Maintenance program
		Upgrade	• Buildings are fit for purpose • Buildings are accessible by all users	• Asset assessment program • Early Years Infrastructure Plan • Master plans • Recreation and Leisure Strategy • Climate Action Plan
		Renewal	• Building components are in good condition to meet service requirements	• Identifying renewals through life-cycle modelling
		Disposal	• Buildings that are excess to service delivery or obsolete in nature are disposed	• Asset Sale and Disposal Policy
		Asset Re-purpose	• Excess or redundant assets are re-purposed for community requirements	• Master plans and service plans

Category	Level of Service	Service Attributes	Service Standard	Delivery Mode
Buildings	Community	Function	• Building features such as layout, thermal comfort, ventilation, furniture and equipment meet user requirements and support the services the building intend to provide	• Asset assessment program
		Quality	• Buildings are in good condition and provide comfortable amenity for all users	• Asset assessment program
		Accessibility (Disability)	• Buildings cater for disability access	• Asset assessment program • Upgrading buildings to be compliant at the time of renewal as much as possible
		Safety	• Buildings are safe for occupation	• Essential service program
		Availability	• Public buildings are available at the times required except for planned shutdowns	• Website information

Drainage

Category	Customer Values
Drainage	Drainage network remains free of obstructions and blockages
	Integrate drainage systems into natural water storage areas effectively
	Limit flooding of public and private properties

Category	Level of Service	Service Attributes	Service Standard	Delivery Mode
Drainage	Technical	Operation & Maintenance	<ul style="list-style-type: none"> • Drainage network is maintained to meet service requirements • Assets are inspected and responded to in a pre-determined frequency or on an as-required basis 	<ul style="list-style-type: none"> • Annual roadside pit inspection program • Reactive maintenance program
		Upgrade	<ul style="list-style-type: none"> • Upgrade existing drainage network to reduce flood risk 	<ul style="list-style-type: none"> • Drainage design guidelines • Drainage network flood modelling study
		Renewal	<ul style="list-style-type: none"> • Drainage network is kept in good condition to meet service requirements 	<ul style="list-style-type: none"> • Identifying renewals through life-cycle modelling program or customer requests
		Acquisition	<ul style="list-style-type: none"> • New assets are acquired to meet community requirements when needed 	<ul style="list-style-type: none"> • Special Rate and Special Charge Policy and guidelines • Capital improvement program
	Community	Capacity	<ul style="list-style-type: none"> • The drainage network is able to transport stormwater generated by frequent rainfalls (one in ten year rainfall event) 	<ul style="list-style-type: none"> • Drainage design guidelines • Drainage network flood modelling study
		Function	<ul style="list-style-type: none"> • Any disruption caused by drainage blockages will be resolved quickly and allow for safe use of adjoining roads, pathways, and reserves 	<ul style="list-style-type: none"> • Reactive maintenance program
		Quality	<ul style="list-style-type: none"> • The drainage network is in good condition and limits flooding caused by rainfall events or blockages 	<ul style="list-style-type: none"> • Roadside pit inspection and cleaning program • Drainage design guidelines

Open Space

Category	Customer Values
Open Space	Open space network is fit for purpose
	Playgrounds are up to modern standards
	Trails are well connected and in a good condition

Category	Level of Service	Service Attributes	Service Standard	Delivery Mode
Open Space	Technical	Operation & Maintenance	<ul style="list-style-type: none"> Open space network is maintained to meet service requirements Assets are inspected on a pre-determined, frequent or as-required basis Defects identified as above intervention levels are fixed and hazards are addressed within pre-determined response times 	<ul style="list-style-type: none"> Northern Regional Trails Strategy Trail operating levels of service Proactive maintenance inspection program Open space level of service
		Upgrade	<ul style="list-style-type: none"> Upgrade existing playgrounds including play equipment to meet legislative requirements and modern standards 	<ul style="list-style-type: none"> Asset assessment program
		Renewal	<ul style="list-style-type: none"> Open space network is kept in a good condition to meet service requirements 	<ul style="list-style-type: none"> Identifying renewals through life-cycle modelling program Asset assessment program
		Expansion (New)	<ul style="list-style-type: none"> Expand current trail networks to accommodate missing links 	<ul style="list-style-type: none"> Northern Regional Trails Strategy
		Acquisition	<ul style="list-style-type: none"> New recreational trails, playing surfaces and playgrounds are acquired in areas where there are no provision 	<ul style="list-style-type: none"> Northern Regional Trails Strategy Green Wedge Management Plan Open Space Strategy

Category	Level of Service	Service Attributes	Service Standard	Delivery Mode
Open Space	Community	Function	• Play equipment is fit for purpose and up to modern standard	• Asset assessment program
			• Residents have access to recreational trails, ovals and playgrounds within reasonable distance from their homes	• Recreation and Leisure Strategy • Green Wedge Management Plan • Health and Wellbeing Plan
			• Trails and playgrounds are accessible (disability) and pram compliant	• Upgrading any non-compliant assets to - as much as possible - be compliant at the time of renewal
		Quality	• Open Space network is in good condition and meets user requirements	• Asset assessment program
		Safety	• Open space network is safe for all users	• Trail operating levels of service

Transport

Category	Customer Values
Transport	Transport network is safe and hazard-free
	Transport network provides connectivity within the shire
	Transport network provides smooth and comfortable pedestrian and vehicular movement

Category	Level of Service	Service Attributes	Service Standard	Delivery Mode
Transport	Technical	Operation & Maintenance	<ul style="list-style-type: none"> • Transport network hazards/defects are inspected and responded to within reasonable timeframes • Grading of unsealed roads 	<ul style="list-style-type: none"> • Road Management Plan
		Upgrade	<ul style="list-style-type: none"> • Bridges are upgraded to cater for increase in traffic and load limits • Unsealed roads are upgraded to meet community requirements when needed 	<ul style="list-style-type: none"> • Master plans • Asset assessment program • Unsealed Roads Improvement Prioritisation Policy • Special Rate and Special Charge Policy and guidelines • Developer contribution program
		Renewal	<ul style="list-style-type: none"> • Transport network is kept in a good condition to meet service requirements 	<ul style="list-style-type: none"> • Identifying renewals through life-cycle modelling program • Asset assessment program
		Expansion (New)	<ul style="list-style-type: none"> • Expand current footpath and trail networks to accommodate missing links 	<ul style="list-style-type: none"> • Nillumbik footpath missing links • Green Wedge Management Plan
		Acquisition	<ul style="list-style-type: none"> • New footpaths are acquired in areas where there is no footpath provision 	<ul style="list-style-type: none"> • Integrated Transport Strategy • Footpath Strategy • Nillumbik footpath missing links • Green Wedge Management Plan

Category	Level of Service	Service Attributes	Service Standard	Delivery Mode
Transport	Community	Capacity	<ul style="list-style-type: none"> • Bridges are structurally sound and meet acceptable load capacities 	<ul style="list-style-type: none"> • Asset assessment program
		Function	<ul style="list-style-type: none"> • Transport network is adequate to handle amount of traffic and users and can get to places within a reasonable time based on speed limits 	<ul style="list-style-type: none"> • Traffic count monitoring program • Local Area Traffic Management Plan • Northern Regional Trails Strategy
			<ul style="list-style-type: none"> • Footpaths and bus shelters are accessible (disability) and pram compliant 	<ul style="list-style-type: none"> • Capital works plan • Upgrade non-compliant assets to be compliant at the time of renewal where possible and appropriate
		Quality	<ul style="list-style-type: none"> • Transport network is accessible to users and provides connectivity across the shire, allowing efficient traffic and pedestrian movement 	<ul style="list-style-type: none"> • Integrated Transport Strategy • Green Wedge Management Plan
			<ul style="list-style-type: none"> • Signage is adequate across the network and easily seen and understood by all users 	<ul style="list-style-type: none"> • Road Management Plan
			<ul style="list-style-type: none"> • Transport network is in good condition and provides comfortable walk /ride quality to all users 	<ul style="list-style-type: none"> • Asset assessment program
			<ul style="list-style-type: none"> • Transport network is maintained clean, free from debris and excessive vegetation 	<ul style="list-style-type: none"> • Road Management Plan • Street sweeping program
		Safety	<ul style="list-style-type: none"> • Transport network is safe for all users 	<ul style="list-style-type: none"> • Road Management Plan • Road safety program • Box clearance program • Black spot program

7. Legislative & Council Requirements

Asset management is not a stand-alone exercise. The planning, design, creation, operation/maintenance and renewal/upgrade/expansion/disposal of assets that meet the needs of a community are related to a significant number of legislative and council documents and requirements. These are:

Buildings

Type: Legislative

Documentation	Category	Requirements
Building Act 1993	Buildings	The Act sets out the framework for the regulation of building construction, building standards and the maintenance of specific building safety features.
Building Code Australia (BCA)	Buildings	The goal of the BCA is to enable the achievement of nationally consistent, minimum necessary standards of relevant: health; safety (including structural safety and safety from fire); and amenity and sustainability objectives, efficiently.
Children Services Act 1996	Buildings	Aims to reduce poverty. Supporting parents to find and keep work increases the child's environment and living circumstances, thereby reducing inequalities among children most at risk of poverty via deprivation/disadvantages and promoting social mobility.
Children, Young and Families Act 2005	Buildings	The Act builds on the foundations of the Child Wellbeing and Safety Act 2005 (CWSA) to provide guidance on additional considerations in promoting positive outcomes for children who are vulnerable as a result of their family circumstances.
Children's Services Regulations 2020	Buildings	The objective of these Regulations is to regulate the licensing and operation of children's services.

Documentation	Category	Requirements
Green Building Council Australia green star rating	Buildings	Assesses the sustainable design, construction and operation of buildings, fit outs and communities.

Type: Council

Documentation	Category	Requirements
Early Years Infrastructure Plan	Buildings	Addresses long term supply and demand, functionality and quality solutions for Council's early years' infrastructure facilities.
Ecologically Sustainable Development Policy	Buildings	Provides direction for sustainable building and maintenance activities, including those related directly to the project and those for ongoing use of the asset.
Edendale Farm Master Plan	Buildings	Directs the future development and operation of Edendale Farm and enhances its ability to grow to a regional centre for environmental sustainability.
Public Toilet Strategy	Buildings	Guides the planning and decision making in relation to the provision of public toilets in public open space throughout Nillumbik Shire.
Water Tank Policy for Council owned/managed land	Buildings	Articulates the administrative requirements for the installation of water tanks on Council owned/managed land to ensure installations occur in an effective manner and to a high standard.

Drainage

Type: Legislative

Documentation	Category	Requirements
All other relevant Australian standards, regulations and codes of practice	Drainage	<p>Australian Rainfall and Runoff guideline (2019). Provides 'Australian designers with the best available information on design flood estimation' and in turn provides 'a sound basis for the sizing of works and structures that are subject to floods.'</p> <p>Australian standard – Design charts for stormwater and sewerage AS2200-2006. This document provides design charts for fluids in pipes.</p>
Building Act 1993 and Building Regulations 2018	Drainage	<p>To provide for the regulation of building and building standards (S1) Provides for:</p> <ul style="list-style-type: none"> - Consent from Council to build over easements vested in Council (reg. 130); - A report to be gained from Council on the points of discharge (reg. 133); and - Control of buildings in flood prone areas (reg. 153).
Catchment and Land Protection Act 1994	Drainage	<p>Includes setting up a framework for the integrated management and protection of catchments (S1).</p> <p>The Act establishes the catchment management authorities (S11).</p>

Documentation	Category	Requirements
Nillumbik planning scheme	Drainage	Clause 56.07-4 covers the discharge of urban run-off. This clause requires minimal damage and inconvenience to residents from urban run-off, ensures that streets operate adequately during major storm events and provides for public safety, minimises increases in stormwater run-off and protects environmental values and physical characteristics of receiving waters from degradation by urban run-off. Only applies to urban areas.
Water Act 1989	Drainage	Includes the integrated management of all elements of the terrestrial phase of water (S1). The Act gives the rights and responsibilities for the use, flow and control of water. The Act creates waterway management authorities (e.g. Melbourne Water).

Type: Council

Documentation	Category	Requirements
Building Over Easement Policy	Drainage	Guidelines for the reporting and consent process for works proposed over or within easements vested in Council.
Drainage design guidelines	Drainage	Design principles for the efficient, environmentally sensitive and cost effective control of stormwater runoff to ensure a high level of safety and amenity for the public at all times.
Drainage of unserviced allotments	Drainage	Describes the application of on-site absorption in the event an underground Council drainage system does not service an allotment.

Documentation	Category	Requirements
Integrated Water Management Strategy	Drainage	Promotes the integration of multi-functional infrastructure that progressively reduces reliance on mains supply.
Water sensitive urban design (WSUD) and wetland maintenance guidelines	Drainage	Provides a series of maintenance standards for wetlands and WSUD assets.

Open Space

Type: Legislative

Documentation	AP Category	Requirements
All other relevant guidelines, Australian standards and codes of practice	Open Space	AS 4685.0:2017, Playground equipment and surfacing – Part 0: Development, installation, inspection, maintenance and operation. AS 4373:2007 Pruning amenity trees. AS 2550.10 2006 Elevated working platforms. Code of Practice on electrical safety for the distribution businesses in the Victorian Electricity Supply Industry.
Electricity Safety (Electric Line Clearance) Regulations 2020	Open Space	Code of practice for electrical line clearance.
Flora and Fauna Guarantee Act 1988, Amendment Act 2019	Open Space	Provides procedures for the conservation, management or control of Victoria's native flora and fauna.

Type: Council

Documentation	Category	Requirements
Northern Regional Trails Strategy	Open Space	Identifies a strategic direction for Council to the future provision of shared recreation trails within the Nillumbik Shire to accommodate equestrian, cyclists, walking and land care groups.
Open Space Strategy	Open Space	Identifies opportunities for future open space and highlights ways to more effectively link existing conservation areas and trails. The strategy also provides the criteria for acquiring and managing open space.
Lifetime Play Strategy	Open Space	Provides a framework for the long term re-imagining of public play spaces across the Nillumbik Shire.
Recreation and Leisure Strategy	Open Space	Provides strategic priorities and objectives that will inform the development of sport and active recreation in Nillumbik.
Trail operating levels of service and service standards	Open Space	Details the standards of service and maintenance required for trails within the Nillumbik Shire.

Transport

Type: Legislative

Documentation	Category	Requirements
Road Management (General) Regulations 2016	Transport	Sets out general regulations for the management of roads.
Road Management (Works and Infrastructure) Regulations 2015	Transport	Sets out works and infrastructure requirements for management of roads.

Documentation	Category	Requirements
Road Management Act 2004	Transport	Establish and promote safe and efficient state and local public road networks.
Road Safety Act 1986	Transport	Sets out safe, efficient and equitable road use.
Road Safety Road Rules 2017	Transport	Establishes rules to be observed by road users.
Transport Act 1983	Transport	Outlines Council's responsibility for main roads within its municipal district (is modified according to the Road Management Act 2004).
Transport Integration Act 2010	Transport	Provides the framework for the provision of an integrated and sustainable transport system in Victoria.

Type: Council

Documentation	Category	Requirements
Footpath Strategy	Transport	Aims to promote walking as a healthy and safe way of exercising and accessing community services and facilities. The strategy is concerned with the provision of new footpaths on roads that do not currently have footpaths.
Integrated Transport Strategy	Transport	Aims to quantify and qualify action targets to improve and integrate land-use-related activity with transport options and requirements.

Documentation	Category	Requirements
Road Management Plan	Transport	Outlines Council's road management responsibilities, lists the road assets and details the standards of service and maintenance for roads within the Nillumbik Shire.
Unsealed Roads Improvement Prioritisation Policy	Transport	Provides a strategic framework for the assessment and prioritisation of unsealed roads across the municipality for future sealing and improvement.

Legislative Requirements for All Asset Categories

Documentation	Requirements
All local laws and relevant policies of the Council	Infrastructure Assets Local Law Clause 9. Asset protection. Clause 11. Equipment and materials delivery. Clause 14. Stormwater protection. Clause 15. Drains and water courses. Clause 16. Stormwater drainage connections. Clause 17. Construction of a vehicle crossing. Amenity local law. Clause 10. Council signs. Clause 20. Actions affecting Council land. Clause 21. Removal of vegetation on Council land. Clause 29. Trees and plants not to obstruct or obscure.
Asset Management Accountability Framework (AMAF), (Department of Treasury and Finance Victoria)	The AMAF details mandatory asset management requirements as well as general guidance for agencies responsible for managing assets.
Disability Discrimination Act 1992	Sets out the responsibilities of Council and staff in dealing with access and use of public infrastructure.

Documentation	Requirements
Emergency Management Act 2013	<p>The Emergency Management Act 2013 (the Act) establishes Emergency Management Victoria (EMV), which consists of:</p> <p>The Emergency Management Commissioner (EMC) who is responsible for coordinating the response to major emergencies (including ensuring appropriate control arrangements are in place) and operating effectively during Class 1 and Class 2 emergencies. The EMC is also responsible for co-ordinating consequence management and recovery for all major emergencies.</p> <p>The Chief Executive of Emergency Management Victoria who is responsible for the day-to-day management of Emergency Management Victoria, and the coordination of investment planning for large scale strategic projects for the responder agencies including major procurement and communications and information systems.</p>
Environment Protection Act 2017	<p>To provide a legislative framework for the protection of the environment in Victoria having regard to environment protection principles (S1A).</p> <p>Establishes the Environment Protection Authority (EPA) and details the powers, duties and functions of that authority (Part II).</p>
Heritage Act 2017	<p>The purpose of the Act is to provide protection and conservation of the cultural heritage of Victoria. The Act creates a framework to identify the most important non-Aboriginal heritage in Victoria, and regulates changes to those places. The Act also creates offences and other enforcement measures to protect and conserve heritage.</p>
Local Government Act 1989 Local Government Act 2020	<p>Sets out the responsibilities of Council and staff in dealing with access and use of public infrastructure.</p>
Local Government Finance and reporting Regulations 2004	<p>Sets out role, purpose, responsibilities and powers of local governments including a requirement for the preparation of 10-year asset plans.</p>

Documentation	Requirements
Native Title Act 1993	Provides for the recognition and protection of native title as well as establishing ways in which future dealings affecting native title may proceed and to set standards for those dealings.
Occupational Health and Safety Act 2004	Aims to secure the health, safety and welfare of people at work. It lays down general requirements that must be met at places of work in Victoria. The provisions of the Act cover every place of work in Victoria. The Act covers self-employed people as well as employees, employers, students, contractors and other visitors.
Occupational Health and Safety Regulations 2017	Outlines minimum actions to be taken to comply with the OH&S Act. It explains plant and equipment such as lifts, boilers maintenance, inspection and testing and WorkCover registration requirements.
Planning and Environment Act 1987	Planning and Environment Act 1987. Sets the legislative requirements for planning and environmental concerns in new and upgraded areas. Allows for the impact of asset construction and growth and sets parameters to trigger Council activities/actions.
Subdivisions Act 1988	Requires engineering plans to be provided for developments in accordance with relevant standards.
Workplace Health and Safety Act 2011	The objective of this Act is to prevent a person's death, injury or illness being caused by a workplace, a relevant workplace area, work activities, or by plant or substances for use at a relevant place.

Council Requirements for All Asset Categories

Documentation	Requirements
Asset Management Policy and Strategy	Provides a framework and direction for asset management by identifying Council's asset management objectives and tactics required to move asset management within the organisation forward.
Asset Sale and Disposal Policy	Documents the process involved in the sale or disposal of assets, appropriate methods of disposal, the type of public consultation required (if any), delegations of authority, and the documentation required during the process.
Climate Action Plan	Provides a response to climate change with a focus on the roles and responsibilities of Council. It includes actions Council will take relevant to its operations and services.
Conditions of use - Shire sports grounds and pavilions	The purpose of the Conditions of Use policy is to provide sport and recreation clubs with clear guidelines and responsibilities for the effective management and maintenance of Council owned sporting facilities.
Council Plan	Outlines Council's values and describes how services will be planned and delivered. The plan is reviewed annually and revised during each council term.
Diamond Creek Major Activity Centre / Structure Plan	Sets out the overall vision, objectives, strategies and actions for the town centre of Diamond Creek. It provides the scope for change, renewal and identifies the means of providing future physical infrastructure and community facilities.
Disability Action Plan	Provides the framework for Council to address disability and other access issues, across all areas of the organisation's operations and to support Council to meet its requirements under relevant legislation.

Documentation	Requirements
Eltham Lower Park Masterplan	Provides a strategic direction for the future development of the park by establishing a priority works plan to meet the needs of Council, permanent tenants and casual visitors.
Eltham Major Activity Centre / Structure Plan	Sets out the overall vision, objectives, strategies and actions for the town centre of Eltham. It provides the scope for change, renewal and identifies the means of providing future physical infrastructure and community facilities.
Eltham North Reserve Masterplan	Masterplans provide a strategic direction for the future development specified areas and aim to balance the needs of permanent tenants and casual visitors as well as passive and active recreational and environmental concerns.
Green Wedge Management Plan	Directs Council policy and planning decisions relating to the Nillumbik Green Wedge and is a reference document in the Nillumbik planning scheme.
Health and Wellbeing Plan	A guide for Council's medium to long term approach to planning and service provision needs for older people living in Nillumbik Shire. The framework establishes and prioritises service standards and delivery in response to increasing demands for improved infrastructure and to increase facilities and activities where people can socialise and to support health and wellbeing.
Heritage Strategy	Provides guidance for the advancement of heritage protection and interpretation within the Nillumbik Shire.
Hurstbridge Township Strategy	Provides a framework for the planning and delivery of capital works in the Hurstbridge township area, landscape and urban design initiatives and environmental works projects.

Documentation	Requirements
Kangaroo Ground War Memorial Park Management Plan	Outlines a range of capital and operational improvement works that would maintain and enhance the existing character and function of the park.
Local laws, standards and policies	Adherence to established practices and guidelines regarding asset management.
Municipal Emergency Management Plan	The aim of this plan is to detail the arrangements for the privation and preparedness for response to and recovery from emergencies within Nillumbik Shire. Council recognises it has a key role in prevention and mitigation activities. Council's policies on land management, building codes, regulations and urban planning are combined to ensure that all possible measures are addressed to reduce the likelihood and impact of emergencies.
Municipal Fire Management Plan	Seeks to prevent and mitigate against the occurrence of unplanned fires and includes priority risk environment categories, which include, but are not exclusive: accommodation (including special accommodation, aged care, residences, hotels, motels, boarding houses, caravan parks) and places of assembly and institutions (health care, education, public halls and entertainment venues).
Plenty War Memorial Park Masterplan	Provides a strategic direction for the future development of the park by establishing a priority works plan to meet the needs of Council, permanent tenants and casual visitors.
Project plans	These plans are prepared for major projects and assets. They include benefit cost ratios, expected strengths, weaknesses, opportunities and threats to the project or asset. By developing a project plan, it is intended to identify projects that return the most benefit to the community and ensure that major assets continue to provide value for money.

Documentation	Requirements
Risk Management Policy	Outlines objectives to achieve better risk management and greater accountability. These principles are incorporated in the Asset Management Plan to enable informed decisions regarding the management of risks associated with council's assets.
Soccer Strategy	Provides a guide to the current and future demand for soccer in Nillumbik and the surrounding region and facility development/redevelopment opportunities, including indicative capital cost estimates.
Standard drawings	Details typical design standard drawings for road and drainage infrastructure.
Special Rate and Special Charge Policy and guidelines	Guides the implementation of special charge schemes for road and drainage infrastructure.
St Andrews Township Plan	Aims to guide land use, community development and infrastructure improvements and provide an opportunity for the community of St Andrews to shape the future of the township.
Strategic Resource Plan	This plan incorporates the financial forecast and resource allocation in a standard statement format which are required to help deliver the Council Plan.
Sustainable Water Management Plan	Aims to reduce Council's water consumption and to establish targets for the quality of stormwater discharged within the Nillumbik Shire.
Wattle Glen Township Strategy	Provides a framework for the planning and delivery of capital works in the Wattle Glen township, environmental education initiatives and environmental works projects.
Yarrambat Local Structure Plan	Provides the framework for the co-ordinated development of rural residential land at Yarrambat.

8. Future Demands

The ability to predict future demand for services, enables Council to plan ahead and identify the best way of meeting that demand. This section analyses the various drivers influencing the services supported by major asset classes.

Demographics, Current and Future

Age Category	Age Group	2021	2046
Children	0 to 4	3,340	3,187
	5 to 9	3,985	3,796
	10 to 14	4,675	4,091
	15 to 19	4,645	4,329
	Total	16,645	15,403
Young Adults	20 to 24	3,874	4,196
	25 to 29	2,663	2,775
	30 to 34	3,043	2,754
	Total	9,580	9,725
Adults	35 to 39	3,712	3,591
	40 to 44	4,064	4,032
	45 to 49	4,892	4,688
	50 to 54	5,023	5,258
	55 to 59	4,745	5,591
	Total	22,436	23,160
Older people	60 to 64	4,568	5,249
	65 to 69	3,676	4,512
	70 to 74	2,878	4,145
	75 to 79	1,879	3,601
	80 - 84	965	2,971
	85+	860	4,323
	Total	14,826	24,801
Summary		63,487	73,089

Suburb	2021 Dwellings	2046 Dwellings	Dwelling Change	Dwelling % Change
Diamond Creek	4,370	5,068	698	15.97%
Eltham (Central)	3,384	4,518	1,134	33.51%
Eltham (East)	1,333	1,426	93	6.98%
Eltham (Edendale)	1,104	1,192	88	7.97%
Eltham (South)	1,173	1,397	224	19.10%

Suburb	2021 Dwellings	2046 Dwellings	Dwelling Change	Dwelling % Change
Eltham North	1,559	1,695	136	8.72%
Greensborough	1,883	1,906	23	1.22%
Hurstbridge	1,304	1,411	107	8.21%
Kangaroo Ground - Wattle Glen	393	393	0	0.00%
North Warrandyte	1,043	1,178	135	12.94%
Panton Hill - St Andrews	858	1,036	178	20.75%
Plenty - Yarrambat	1,333	1,495	162	12.15%
Research	934	1,026	92	9.85%
Rural East	478	478	0	0.00%
Total	21,149	24,219	3,070	14.52%

Buildings

Demand Driver	Category	Change in Demand	Impact of Services
Climate change - Zero emission targets and reduction of CO2 emissions	Buildings	<ul style="list-style-type: none"> • Parts of Nillumbik are within fire prone areas, where asset loss is a major concern for council. • Continuous improvement of energy efficient buildings. • Global warming impact. 	<ul style="list-style-type: none"> • Increased upfront costs for specialised materials, equipment, fittings and products. • Building upgrades and a Climate Action funding program. • Weather change may lead to increased need for reactive maintenance from storm and flood damage repair. • Assets will need to be built and renewed to a standard that can withstand at least 1.5 degrees of warming. This may require different materials, methods of construction and other innovative approaches.
Consumer preference / change in society expectations / cultural change	Buildings	<ul style="list-style-type: none"> • Some facilities are by their nature more popular than others, because they provide better service or are better located. 	<ul style="list-style-type: none"> • Adjustment of facilities opening hours depending on usage and popularity.

Demand Driver	Category	Change in Demand	Impact of Services
Demographic profiles change	Buildings	<ul style="list-style-type: none"> Population of older residents (over 60) is expected to have the largest proportional increase (relative to its population size), with a forecast growth of 9,975 persons by 2046. The number of children (aged under 19) is forecast to decrease, whereas adult (aged 20 to 59) age groups are expected to slightly increase by 2046. 	<ul style="list-style-type: none"> Increase in age-based facilities, appropriate sporting pavilions and disability access across sites, service changes due to demographics.
Population change	Buildings	<ul style="list-style-type: none"> Nillumbik's residential population of 63,487 in 2021 is forecast to grow by approximately 15% to 73,089 by 2046. 	<ul style="list-style-type: none"> Council may need to expand services and facilities to cater for the community growth.

Drainage

Demand Driver	Category	Change in Demand	Impact of Services
Climate change: annual rainfall volume within South-east Australia	Drainage	<ul style="list-style-type: none"> Annual rainfall expected to decrease 10% by 2030 and 35% by 2070. 	<ul style="list-style-type: none"> Less rainwater will increase the demand for uptake of stormwater for reuse. This may require upgrades to existing infrastructure, or acquisitions, to fulfil these demands.
Climate change: variance in daily rainfall	Drainage	<ul style="list-style-type: none"> An expected increase in single-day rainfall volume. 	<ul style="list-style-type: none"> Larger variance in rainfall implies more frequent flooding and expectant increase for drainage protection.
Commercial & industrial development	Drainage	<ul style="list-style-type: none"> Currently there are no plans for industrial expansion within the municipality. 	<ul style="list-style-type: none"> Minimal impact on services.

Demand Driver	Category	Change in Demand	Impact of Services
Cultural change	Drainage	<ul style="list-style-type: none"> Community awareness and involvement in sustainable and environmental issues has risen over the last two decades. Stormwater reuse is receiving attention due to the dual pressures of water sustainability and environmental awareness. 	<ul style="list-style-type: none"> As the community focuses on reusing stormwater, the network's ability to re-uptake stormwater will need to increase. This may require upgrades to existing infrastructure, or acquisitions, to fulfil these demands.
Demand for increased services in areas where drainage is not currently provided	Drainage	<ul style="list-style-type: none"> The demand for expanding the drainage network is expected to increase as community expectations change. 	<ul style="list-style-type: none"> Serviceability of the drainage network is unlikely to meet customer values, which may lead to increased pressure for drainage network extension.
Increase in impervious areas	Drainage	<ul style="list-style-type: none"> Currently there are no plans for industrial expansion within the municipality. 	<ul style="list-style-type: none"> Most multi-lot and smaller subdivisions are required to either construct drainage or absorb stormwater on site to limit discharge rates from the property, whereby the effects of increased impervious area are mitigated.

Demand Driver	Category	Change in Demand	Impact of Services
Residential development	Drainage	<p>The number of dwellings in Nillumbik is forecast to grow from 21,149 in 2021 to 24,219 in 2046 (14.5% increase).</p> <ul style="list-style-type: none"> Residential development within the municipality is heavily constrained due to state government and Council planning controls. Most of the municipality lies outside the urban growth boundary, defined by Melbourne 2030, which prevents land from being developed for residential use. 	<ul style="list-style-type: none"> The adequacy of Council's existing drainage network will be challenged due to the projected increase in residential development, placing pressure on Council to upgrade and extend the drainage network to support this additional growth.
Town planning requirements	Drainage	<ul style="list-style-type: none"> The current requirement of providing drainage services to all properties in new subdivisions is expected to continue. 	<ul style="list-style-type: none"> Existing un-serviced drainage areas may need to be reconsidered for drainage provision at the time of redevelopment. This is, however, difficult to achieve on a single lot basis. The location of the redevelopment (i.e., urban or green wedge) may also influence the need for town planning instruction.

Open Space

Demand Driver	Category	Change in Demand	Impact of Services
Changes in customer expectation	Open Space	<ul style="list-style-type: none"> Nillumbik residents enjoy relatively high socioeconomic and educational status compared to surrounding councils. Residents' expectations on council delivered services are relatively high. 	<ul style="list-style-type: none"> Providing high quality open space assets that are up to modern standards will lead to an increase in renewal, upgrade and expansion costs.

Demand Driver	Category	Change in Demand	Impact of Services
Climate change	Open Space	<ul style="list-style-type: none"> Increased intensity and frequency of extreme weather events. 	<ul style="list-style-type: none"> Increased flooding will see frequent flooding of trails, playgrounds and open spaces making them inaccessible. Some footbridges are susceptible to flooding inducing trail closures. In the longer-term, there may be greater community demand for weather protection, for sports and leisure activities that have traditionally occurred outdoors.
Demographic profile	Open Space	<ul style="list-style-type: none"> Population of older residents (over 60) is expected to have the largest proportional increase (relative to its population size), with a forecast growth of 9,975 persons by 2046. The number of children (aged under 19) is forecast to decrease, whereas adult (aged 20 to 59) age groups are expected to slightly increase by 2046. 	<ul style="list-style-type: none"> The demographic profile change is not expected to impact the open space network significantly, however Council should continue to focus on providing infrastructure that promotes access and equity.
Increased awareness of healthy lifestyles	Open Space	<ul style="list-style-type: none"> Growth in people using recreational space. 	<ul style="list-style-type: none"> Increase in trail usage and demand for open space where activities such as yoga and pilates can be carried out.
Increased female participation and gender diversity in sports	Open Space	<ul style="list-style-type: none"> Growing number of female participation in all sports and a gradual increase in previously male-dominated sports such as cricket and football. 	<ul style="list-style-type: none"> Council may need to expand services and upgrade facilities such as change room and toilets.
Population growth	Open Space	<ul style="list-style-type: none"> Nillumbik's residential population of 63,487 in 2021 is forecast to grow by approximately 15% to 73,089 by 2046. 	<ul style="list-style-type: none"> Council may need to expand the open space network to cater for community growth.

Demand Driver	Category	Change in Demand	Impact of Services
Technology changes - increased trend in going back to nature play	Open Space	<ul style="list-style-type: none"> Increased demand for a diverse range of accessible, attractive, challenging and complementary play spaces offering experiences for all ages and abilities within a natural setting. 	<ul style="list-style-type: none"> Increased cost in upgrading traditional playgrounds.

Transport

Demand Driver	Category	Change in Demand	Impact of Services
Change in customer expectation	Transport	<ul style="list-style-type: none"> Nillumbik residents enjoy relatively high socioeconomic and educational status compared to surrounding councils. Resident's expectations on council delivered services are relatively high. 	<ul style="list-style-type: none"> Expectation of high quality transport network will continue.
Climate change	Transport	<ul style="list-style-type: none"> Climate change will see an increase in risk of extreme weather events including storm events, drought, flooding and fire. 	<ul style="list-style-type: none"> Insufficient kerb and channel capacity impacting road users. Table drains on unsealed roads are prone to high level of erosion from intense rainfall and flooding. Loss of vegetation due to bushfires can lead to abutment/embankment erosion.

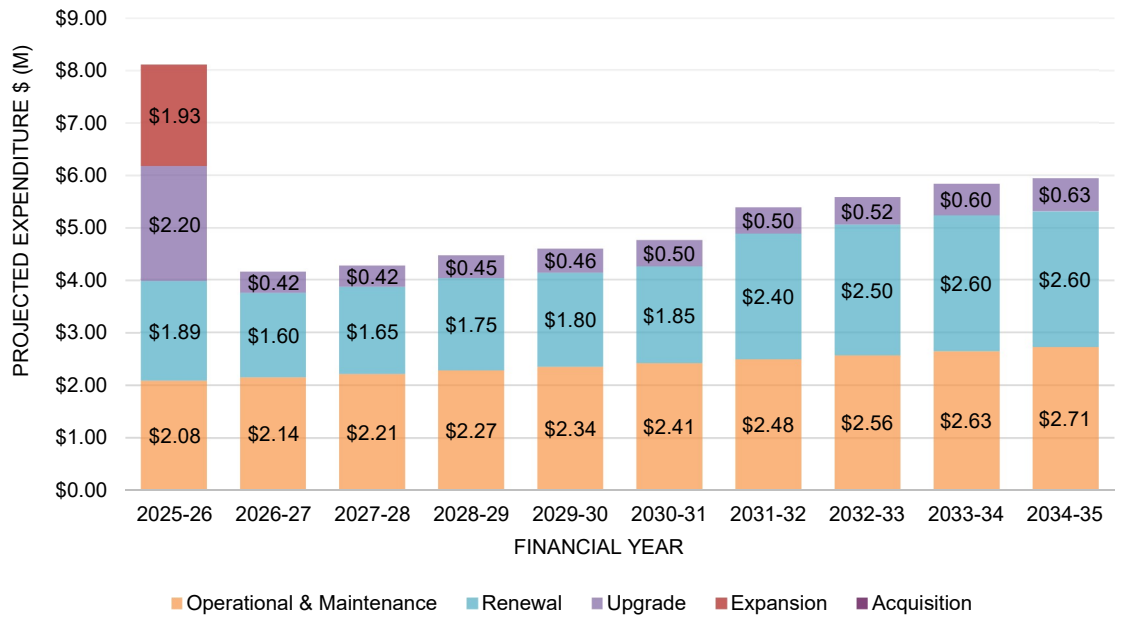
Demand Driver	Category	Change in Demand	Impact of Services
Demographic profile change	Transport	<ul style="list-style-type: none"> Population of older residents (over 60) is expected to have the largest proportional increase (relative to its population size), with a forecast growth of 9,975 persons by 2046. The number of children (aged under 19) is forecast to decrease, whereas adult (aged 20 to 59) age groups are expected to slightly increase by 2046. 	<ul style="list-style-type: none"> The demographic profile change is not expected to impact on the transport network significantly, however Council should continue to focus on providing infrastructure that promotes access and equity.
Increased awareness of sustainability and healthy lifestyles	Transport	<ul style="list-style-type: none"> Growth in public transport, carpooling, cycling or walking as a mode to get to places. 	<ul style="list-style-type: none"> Decrease in vehicular usage and increased demand for safe, accessible and interesting walking routes for people of all abilities.
Population change	Transport	<ul style="list-style-type: none"> Nillumbik's residential population of 63,487 in 2021 is forecast to grow by approximately 15% to 73,089 by 2046. 	<ul style="list-style-type: none"> Population growth will be mostly supported by green-field developments resulting in a greater number of new road and footpath assets being gifted to Council, leading to increased maintenance costs in the future.
Technology change	Transport	<ul style="list-style-type: none"> Development of new sustainable technologies. 	<ul style="list-style-type: none"> New road renewal materials or efficient cars that can alter the renewal costs and useful lives of the assets.

9. Funding Levels

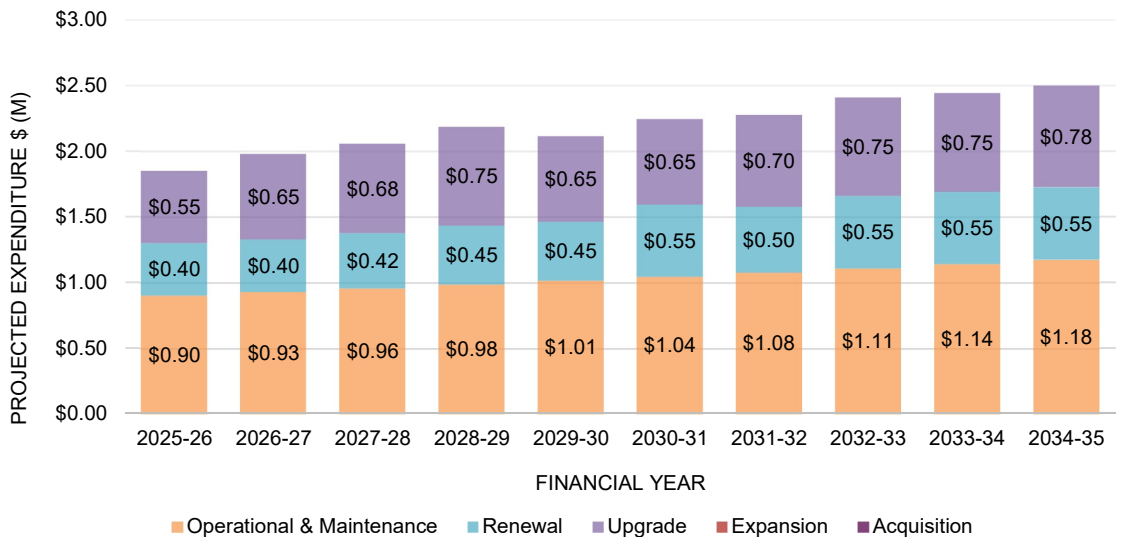
Council's 10-year Financial Plan 2025-2035 provides a forecast view of the financial sustainability of Council over 10 years, with services to be maintained at current levels and continued management of Council's significant asset portfolio.

In line with the Financial Plan, this Asset Plan outlines the projected expenditure requirements for Council's infrastructure assets over the next ten years.

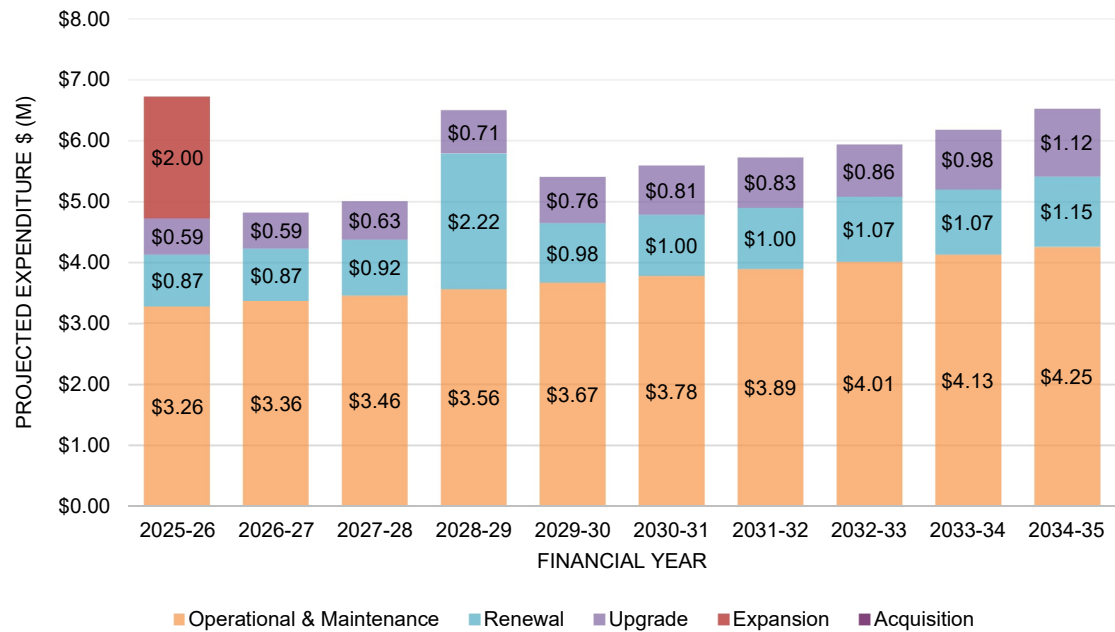
Buildings



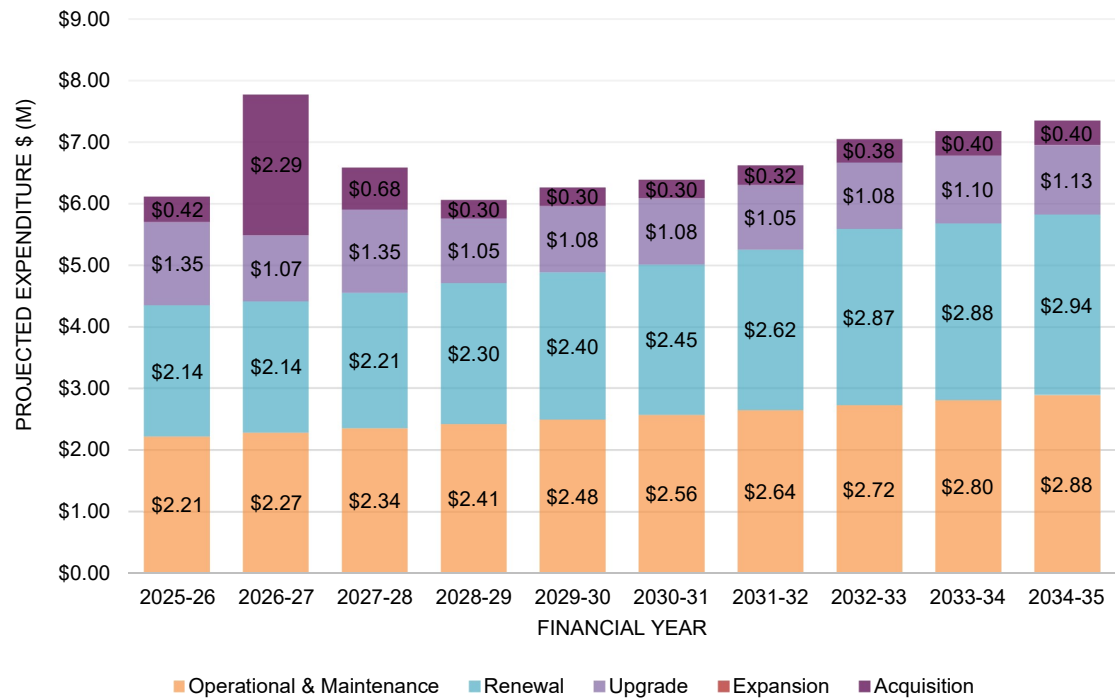
Drainage



Open Space



Transport



10. Risk Management

Council's Risk Management Policy sets the overall framework for addressing risk within the framework of ISO31000-2018. This section of the Asset Plan enables informed decisions to be made regarding the management of risks associated with Council assets.

Risk	Consequence	Cause	Controls
Failure to manage Council's community assets	<ul style="list-style-type: none"> Community infrastructure does not meet current service requirements or operate as originally designed or intended Potential for litigation against Council High life-cycle costs Increasing asset vulnerability in supporting service delivery Premature asset failure Accelerated asset deterioration Assets requiring frequent renewal or maintenance Personal safety risk Loss of an asset 	<ul style="list-style-type: none"> Failure to execute asset renewal and or maintenance works in a timely manner Lack of planning to develop and deliver the renewal program Delaying decisions to dispose of transport assets or undertake renewal works Deferral of acquisition/upgrade/renewal/expansion asset projects due to changing priorities Inappropriate or outdated asset design guidelines, installations or environmental impacts Various climate change scenarios such as more frequent extreme weather events (heavy rainfall, bush fires and droughts) and global warming Increase costs in asset upgrade, renewal, operation and maintenance Increase in user and community expectations for Council to provide climate resilient asset network 	<ul style="list-style-type: none"> Implementation of ongoing condition audit programs Preparation of renewal programs based on asset life-cycle modelling Financial Plan Dedicated maintenance funding Monitor works through asset management system Asset Management Plans Council strategies and structure plans Community Engagement Policy Capital works program Asset maintenance system monitoring failures and optimised renewal program Planning controls Climate Action Plan

11. Continuous Improvement

To ensure Council's asset management approach is effective, improvement plans are prepared during asset management planning.

Continuous improvement in asset management processes and systems will also improve Council's ability to plan for future funding accurately.

This Asset Plan will be reviewed every four years by 31 October in the year following a Council election.

Document Control

Draft Asset Plan 2025 – 2035

Date	Reviewed By	Summary of Changes	Version No.
14/03/2025	Nadine Sinclair	Preliminary draft for initial review	1.0

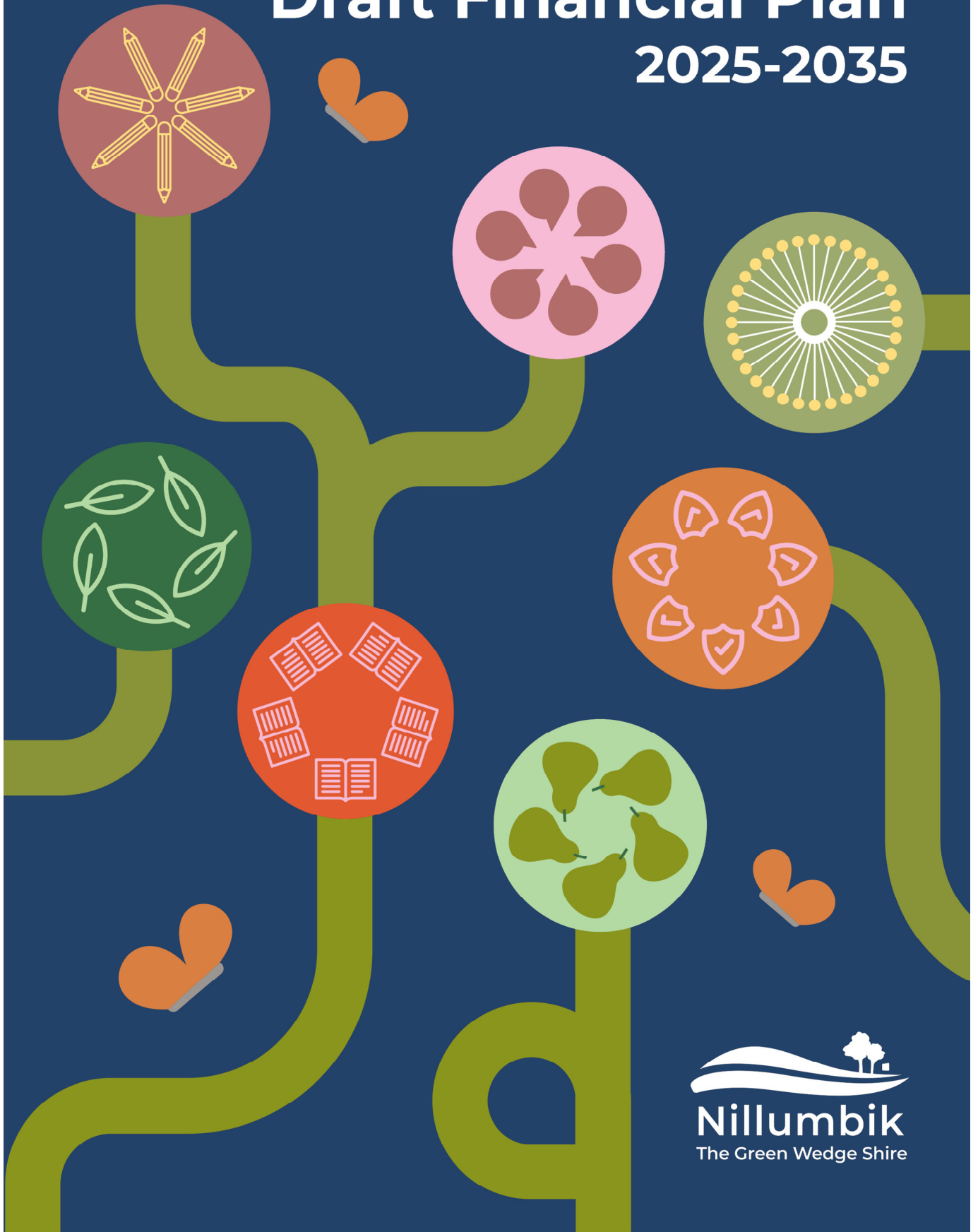


Nillumbik Shire Council

Civic Drive (PO Box 476) Greensborough Victoria 3088
9433 3111 | nillumbik@nillumbik.vic.gov.au

  
nillumbik.vic.gov.au

Draft Financial Plan 2025-2035



Acknowledgement of traditional owners

Nillumbik Shire Council respectfully acknowledges the Wurundjeri Woi-wurrung people as the Traditional Owners of the Country on which Nillumbik is located, and we value the significance of the Wurundjeri people's history as essential to the unique character of the shire. We pay tribute to all First Nations People living in Nillumbik, give respect to Elders past, present and future, and extend that respect to all First Nations People.

We respect the enduring strength of the Wurundjeri Woi-wurrung and acknowledge the ongoing impacts of past trauma and injustices from colonial invasion, massacres and genocide committed against First Nations People. We acknowledge that sovereignty was never ceded.

Wurundjeri Woi-wurrung people hold a deep and ongoing connection to this place. We value the distinctive place of our First Nations People in both Nillumbik and Australia's identity; from their cultural heritage and care of the land and waterways, to their ongoing contributions in many fields including academia, agriculture, art, economics, law, sport and politics.

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The draft Financial Plan, including financial statements, has been prepared in accordance with the requirements of the *Local Government Act 2020* and the *Local Government (Planning and Reporting) Regulations 2020* and with the Australian Accounting Standards Board standards.

1. Legislative Requirements

This section describes how the Financial Plan links to the achievement of the achievement of the Community Vision - Nillumbik 2040 and the four year Council Plan within the Integrated Strategic Planning & Reporting framework. This framework guides the Council in identifying community needs and aspirations over the long term (Community Vision), medium term (Council Plan) and short term (Annual Budget) and then holding itself accountable (Annual Report).

The following diagram provides an overview of the core legislated elements of an integrated strategic planning and reporting framework and outcomes.

Strategic planning framework

Authorisation	Legislation and regulation	
Aspiration	Community Vision – Nillumbik 2040	
Position	Access, Equity and Inclusion Policy	Community Engagement Policy
	Complaints Handling Policy	Information Privacy Policy
Strategic Planning	Annual Budget	Asset Plan
	Council Plan	Financial Plan
	Municipal Planning Strategy	Revenue and Rating Plan
	Nillumbik Health and Wellbeing Plan (incorporating the Disability Action Plan and Ageing Well Plan)	
Strategies and plans	Inclusive living and participation	Sustainable futures and healthy environments
	Early Years Infrastructure Plan Gender Equality Action Plan Reflect Reconciliation Action Plan	Climate Action Plan Integrated Water Management Plan Onsite Wastewater Management Plan Roadside Management Plan Urban Tree Canopy Strategy
	Liveable and connected communities	Responsible governance and community leadership
	Biodiversity Strategy Diamond Creek Major Activity Centre Structure Plan Economic Development Strategy Eltham Major Activity Centre Structure Plan Equine in Nillumbik Green Wedge Management Plan Housing Strategy Integrated Transport Strategy Neighbourhood Character Strategy Open Space Strategy Recreation and Leisure Strategy Road Management Plan	Advocacy Plan Communication Strategy Domestic Animal Management Plan Municipal Emergency Management Plan* Municipal Fire Management Plan* Municipal Relief and Recovery Plan* Municipal Storm and Flood Emergency Management Plan*
Action and implementation	Action and implementation plans	
	Department business plans	
	Nillumbik Planning Scheme	

* Denotes a multi-agency plan

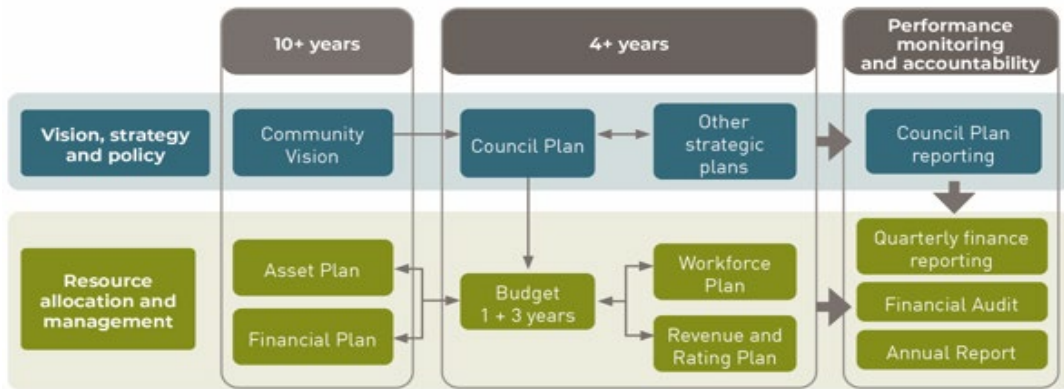
Image: Council's Strategic Planning Framework



Image: Council's Strategic Planning Framework

The following image demonstrates how each element might inform or be informed by other parts of the integrated framework.

Council's planning and reporting framework



1.1 Strategic Planning Principles

The Financial Plan is developed in the context of the following strategic planning principles:

- Council has an integrated approach to planning, monitoring and performance reporting.
- The Financial Plan addresses the Community Vision by allocating funds towards the actions in the four year Council Plan.
- The Financial Plan statements articulate the 10-year financial resources necessary to implement the objectives and strategies of the Council Plan to achieve the Community Vision.
- Council's strategic planning principles identify and address the risks to effective implementation of the Financial Plan. The financial risks are included at section 1.2.2 below.
- The Financial Plan provides for the strategic planning principles of progress monitoring and reviews to identify and adapt to changing circumstances.
- Advocacy and collaboration are considered to be an important aspect when reviewing cost management and exploring any opportunities to increase revenue.

1.2 Financial Management Principles

The Financial Plan demonstrates the following financial management principles:

- 1.2.1 Revenue, expenses, assets, liabilities, investments and financial transactions are managed in accordance with Council's financial policies and strategic plans and the Australian Accounting Standards Board accounting standards.
- 1.2.2 Management of the following financial risks:
 - a) the financial viability of Council (refer to section 2.1 Financial Policy Statements).
 - b) the management of current and future liabilities of Council. The estimated 10 year-liabilities are disclosed in section 3.2 Balance Sheet projections.
 - c) the management of risk also extends to social, climate, environmental and economic risks potentially impacting Council.
- 1.2.3 Financial policies and strategic plans are designed to provide financial stability to the community.
- 1.2.4 Council maintains accounts and records that explain its financial operations and financial position (refer section 3 Financial Statements).

1.3 Engagement Principles

The Council Plan 2025-2029 has been informed by community engagement through the 'Nillumbik Now and Beyond' community engagement initiative undertaken in February 2025, results from the 2025 Annual Community Survey and expands on the themes and aspirations of our Community Vision – Nillumbik 2040. The plan is also the result of Councillor and staff planning workshops to identify directions and outcomes

The Financial Plan 2025-2035 provides the context through which the objectives and strategies of the Council Plan can be funded and ultimately achieve the aspirations of Community Vision.

Council has developed a comprehensive community engagement framework. Council has implemented the following consultation process to ensure due consideration and feedback is received from relevant stakeholders.

- a) Draft Financial Plan preparation is informed by Council Plan and Community Vision;
- b) Draft Financial Plan adopted for public exhibition at the June 2025 Council meeting for a period of 28 day and calling for public submissions;
- c) Community engagement may be conducted using local news outlets and social media;
- d) Hearing of public submissions to the Financial Plan in August 2025;
- e) Financial Plan, including any revisions, presented to in September 2025 to Council for adoption.

1.4 Service Performance Principles

Council services are designed to be purposeful, targeted to community needs and value for money. The service performance principles are listed below:

- a) Services are provided in an equitable manner to the community. The four year Council Plan will guide the organisation's work to deliver on the priorities of Council and the community, and to manage and deliver services for the Nillumbik community during Council's term.
- b) Services are accessible to users within the community.
- c) The Local Government Performance Reporting Framework (LGPRF) is designed to communicate Council's performance regarding the provision of services.
- d) Council considers and responds to community feedback and complaints regarding service provision.

1.5 Asset Plan Integration

Integration to the Asset Plan is a key principle of Council's strategic financial planning principles. The purpose of this integration is designed to ensure that future funding is allocated in a manner that supports service delivery in terms of the plans and the effective management of Council's assets into the future, across each asset category and condition.

The Asset Plan will identify the operational and strategic practices and will ensure that Council manages assets across their lifecycle in a financially sustainable manner. The Asset Plan, and associated asset management policies, provide Council with a sound base to understand the risk associated with managing its assets for the community's benefit.

2. Financial Plan Context

This section describes the context and external / internal environment and consideration in determining the 10 year financial projections and assumptions.

2.1 Financial Policy Statements

This section defines the measures that demonstrates Council's financial sustainability in order to fund the aspirations of the Community Vision - Nillumbik 2040 and the four year Council Plan.

Policy Statement	Measure	Target	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35
Consistent underlying surplus results	Adjusted underlying result	>5%	0.28%	0.94%	1.28%	1.43%	1.72%	2.27%	2.84%	3.02%	3.93%	4.10%
Ensure Council maintains sufficient working capital to meet its debt obligations as they fall due.	Current Assets / Current Liabilities	>1.5	1.32	1.32	1.40	1.56	1.70	1.88	2.05	2.18	2.46	2.66
Allocate adequate funds towards renewal capital in order to replace assets and infrastructure as they reach the end of their service life.	Asset renewal and upgrade expenses / Depreciation	100%	117.6%	81.5%	88.7%	85.8%	90.1%	94.7%	98.3%	103.0%	109.7%	97.3%
That Council applies loan funding to new capital and maintains total borrowings in line with rate income and growth of the municipality.	Total borrowings / Rate revenue	<60%	19.7%	15.5%	11.8%	8.4%	6.4%	4.4%	2.9%	1.7%	0.5%	0.2%
Council maintains sufficient unrestricted cash to ensure ongoing liquidity as well as to address unforeseen cash imposts if required.	Unrestricted cash / current liabilities	>80%	34.3%	-0.9%	0.9%	6.8%	16.8%	31.3%	45.6%	61.6%	79.8%	97.4%
Council generates sufficient revenue from rates plus fees and charges to ensure a consistent funding for new and renewal capital.	Capital Outlays as a % of Own Source Revenue	>30%	20.1%	12.8%	11.9%	10.8%	11.0%	11.1%	11.0%	11.0%	11.3%	9.5%

2.1 Financial Policy Statements continued

As can be seen from the above table, the results across the indicators for the current financial year demonstrate that overall financial sustainability is being maintained through active management of Council's underlying financial practices. The forecast results in the outer years are indicating fluctuating trends highlight the reliance on grant funding.

The forecast **underlying surplus** results show a stabilising trend, reflecting limited growth in own-source revenue and maintenance of operational expenditure in line with service levels. The trend reinforces the reliance on external funding sources, such as grants from other levels of government.

Council's **liquidity** forecasts are stable and reflects liabilities, including borrowing maturities and a greater proportion of the provision for landfill rehabilitation becoming current and cash balances lowering as capital projects are completed.

Council continues to invest in public infrastructure and community **asset renewal** with an underlying criteria being the renewal gap, to ensure Council's responsibility remains at a manageable level. The forecast results mirror the capital works program currently scheduled and in future years; and again highlights the reliance on external funding.

Council continues to repay its existing **loans and borrowings** and has budgeted to take out further loans in 2025/2026. This is offset by borrowing maturities schedule to occur each year, resulting in the declining overall debt balance and trend.

Council does not budget for non-recurrent grant funding where there is a high degree of uncertainty or lack of assurance of receipt. As such **unrestricted cash** balances fluctuate but remain at sustainable levels.

Council is highly reliant on external funding sources in order to achieve the desired level of **capital outlay**, as demonstrated in the forecast results.

2.2 Strategic Actions

The strategic actions are included in the 10-year financial plan.

1. That Council adopt the following statements as being an integral part of the budget setting process for current and future budgets.
2. That the working capital ratio be targeted to reach and then exceed a ratio of 1.5.
3. That rates funded capital expenditure on asset renewal projects (and upgrades that have a significant renewal component) be given priority over capital expenditure on new assets to achieve consistent and sustainable asset renewal, and that grant funding is actively sought to address the need or desire for new and expanded community infrastructure.
4. That any new projects that require loan funding be given priority if the projects that are driven by legislative requirements, represent a significant benefit to Council's longer term sustainability, or will have proven cash flows in future periods to 'repay' the cash outlays required in the initial periods.
5. That Council consider the most appropriate fees and charges strategy so that adequate funds are recovered to offset operational expenses in annual and future budgets.

2.3 Assumptions to the financial plan statements

This section presents information in regard to the assumptions to the Comprehensive Income Statement for the 10 years from 2025-26 to 2034-35.

Description and table of annual escalations, for the 10 year period, for each income and expenditure line item contained in the Comprehensive Income Statement.

Escalation Factors	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35
CPI	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Growth (assessments)	130	130	130	130	130	130	130	130	130	130
Rates and charges	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Statutory fees and fines	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
User fees	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Grants - operating	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Grants - capital	<i>Capital grants are forecast in line with anticipated capital works.</i>									
Interest revenue	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%
Contributions - monetary	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Other income	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Employee costs	2.75%	2.75%	3.00%	3.25%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Materials and services	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Depreciation & amortisation	<i>Budgeted depreciation and amortisation is based on current depreciation, plus an increase based on budgeted capital works, less a retirement/ renewal factor.</i>									
Other expenses	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%

The above factors are used in combination with specific growth factors when modelling operational expenditure, particularly where contracts are in place or other known cost escalations exist.

2.3.1 Rates and charges

Rate revenue will increase by 3.00% for the 2025-26 year, based on the state government rate cap, with estimated future annual increases of 3.00% per annum for the ensuing years of the long term financial plan.

Waste charges are estimated to increase in line with the CPI growth increases to ensure Council continues to recover the full costs of providing waste services and to rehabilitate former landfill sites at Plenty and Kangaroo Ground.

2.3.2 Statutory fees and fines

The Financial Plan indexes statutory fees, set by legislation, according on the estimated annual rate of CPI.

2.3.3 User fees

User charges relate mainly to the recovery of service delivery costs through the charging of fees. The key principle for determining the level of user charges has been to ensure that increases are generally consistent with cost increases.

Revenue increases for the ensuing years are in line with growth assumptions in the state government rate cap.

2.3.4 Grants

Operating grants include all monies received from State and Federal sources for the purposes of funding the delivery of Council's services. Overall, the level of operating grants is expected to decrease by 27.83 percent or \$2.22 million. This is mainly due to a large number one-off non-recurrent grants received in 2024-25.

2.3.5 Contributions

Council receives contributions from developers. These contributions represent funds to enable council to provide the necessary infrastructure and infrastructure improvements to accommodate development growth. The contributions are for specific purposes and require Council to outlay funds for infrastructure works before receipt of this income source. These contributions are statutory contributions and are transferred to a restricted reserve until utilised for a specific purpose through the capital works program or delivered as works in kind by developers.

2.3.6 Other income

Revenue from other income mainly comprises investment income plus the recovery income from a variety of sources and rental income received from the hire of Council buildings.

2.3.7 Employee costs

Employee costs include all labour related expenditure including; wages and salaries and on-costs for both casual employees and permanent employees. Salaries and wages have been increased based on Council's Enterprise Agreement which provides a 2.75 percent increase. The superannuation rate for the 2025-26 financial year has been increased to 12 percent to reflect changes in the superannuation guarantee legislation.

This is reflective of budgeted annual increases of 2.75 percent for 2026-27, 3.0 percent for 2027-28, 3.25 percent for 2028-29 and 3.0 percent up to 2034-35 to provide for annual EBA increases.

2.3.8 Materials and services

Material costs include items required for the maintenance and repairs of Council buildings, roads, drains and footpaths. Other associated costs included under this category are utilities and purchase of consumable items for a range of services. Council also utilises external expertise on a range of matters. These costs are kept to within CPI levels year on year.

2.3.9 Depreciation & amortisation

Depreciation is an accounting measure which allocates the value of Council's property, plant and equipment including infrastructure such as roads and drains assets over their useful life. Depreciation and amortisation is based on prior year depreciation, plus an increase based on budgeted capital works, less a retirement/ renewal factor.

2.3.10 Borrowing costs

Borrowing costs comprise the interest expense to service Council's loan portfolio that is described in Section 5.1 Borrowing Plan.

2.3.11 Other expenses

Other expenses include administration costs such as Councillor allowances, election costs, sponsorships, partnerships, community grants, lease expenditure, remittance of the emergency services and volunteers fund, audit costs and other costs associated with the day to day running of Council.

3. Financial Statements

This section presents information in regard to the Financial Statements and Statement of Human Resources. The budget information for the year 2025-2026 has been supplemented with projections to 2034-2035.

This section includes the following financial statements prepared in accordance with the *Local Government Act 2020* and the *Local Government (Planning and Reporting) Regulations 2020*.

The appendix includes the following budgeted information:

- Comprehensive Income Statement
- Balance Sheet
- Statement of Changes in Equity
- Statement of Cash Flows
- Statement of Capital Works
- Statement of Human Resources

Comprehensive Income Statement
For the five years ending 30 June 2030

	Financial Plan Projections				
	2025-26	2026-27	2027-28	2028-29	2029-30
	\$'000	\$'000	\$'000	\$'000	\$'000
Income / Revenue					
Rates and charges	83,361	86,237	88,821	91,495	93,321
Statutory fees and fines	2,077	2,140	2,204	2,270	2,338
User fees	19,267	19,845	20,440	21,053	21,685
Grants - operating	5,750	5,922	6,100	6,283	6,472
Grants - capital	5,348	1,904	1,478	1,478	1,478
Contributions - monetary	104	107	110	113	116
Contributions - non-monetary	-	-	-	-	-
Net gain/(loss) on disposal of property, infrastructure, plant and equipment	-	-	-	-	-
Fair value adjustments for investment property	-	-	-	-	-
Share of net profits/(losses) of associated and joint ventures	-	-	-	-	-
Other income	2,078	2,033	1,991	2,014	2,038
Total income / revenue	117,985	118,188	121,144	124,706	127,448
Expenses					
Employee costs	43,723	45,175	46,640	48,036	49,474
Materials and services	46,355	47,770	49,203	50,650	52,139
Depreciation	14,354	14,191	14,169	13,972	13,893
Allowance for impairment losses	0	0	0	0	0
Depreciation - right of use assets	572	456	542	475	519
Borrowing costs	800	759	608	467	355
Finance costs - leases	204	182	178	141	102
Other expenses	6,208	6,554	6,688	7,616	7,205
Total expenses	112,216	115,087	118,028	121,357	123,687
Surplus / (deficit) for the year	5,769	3,101	3,116	3,349	3,761
Other comprehensive income					
Items that will not be reclassified to surplus or deficit in future periods					
Net asset revaluation gain /(loss)	-	-	-	-	-
Share of other comprehensive income of associates and joint ventures	-	-	-	-	-
Items that may be reclassified to surplus or deficit in future periods					
Total comprehensive result	5,769	3,101	3,116	3,349	3,761

Comprehensive Income Statement Forward Estimates

For the five years ending 30 June 2035

	Financial Plan Projections				
	2030-31	2031-32	2032-33	2033-34	2034-35
	\$'000	\$'000	\$'000	\$'000	\$'000
Income					
Rates and charges	96,187	99,118	102,189	105,369	108,019
Statutory fees and fines	2,408	2,481	2,555	2,632	2,711
User fees	22,335	23,005	23,696	24,406	25,139
Grants - operating	6,666	6,866	7,072	7,284	7,502
Grants - capital	1,478	1,478	1,478	1,478	1,478
Contributions - monetary	120	124	127	131	135
Contributions - non-monetary	-	-	-	-	-
Net gain/(loss) on disposal of property, infrastructure, plant and equipment	-	-	-	-	-
Fair value adjustments for investment property	-	-	-	-	-
Share of net profits/(losses) of associated and joint ventures	-	-	-	-	-
Other income	2,069	2,100	2,133	2,166	2,200
Total income	131,263	135,172	139,250	143,466	147,184
Expenses					
Employee costs	50,955	52,481	54,052	55,671	57,338
Materials and services	53,673	55,253	56,881	58,557	60,284
Depreciation	13,765	13,549	13,282	13,137	12,855
Allowance for impairment losses	-	-	-	-	-
Depreciation - right of use assets	431	431	431	431	431
Borrowing costs	271	190	125	64	20
Finance costs - leases	77	77	77	77	77
Other expenses	7,552	7,794	8,643	8,338	8,604
Total expenses	126,724	129,775	133,491	136,275	139,609
Surplus (deficit) for the year	4,539	5,397	5,759	7,191	7,575
Other comprehensive income					
Items that will not be reclassified to surplus or deficit in future periods					
Net asset revaluation gain /(loss)	-	-	-	-	-
Share of other comprehensive income of associates and joint ventures	-	-	-	-	-
Items that may be reclassified to surplus or deficit in future periods	-	-	-	-	-
Total comprehensive result	4,539	5,397	5,759	7,191	7,575

Balance Sheet

For the five years ending 30 June 2030

	Financial Plan Projections				
	2025-26	2026-27	2027-28	2028-29	2029-30
	\$'000	\$'000	\$'000	\$'000	\$'000
Current assets					
Cash and cash equivalents	22,222	22,430	23,943	26,391	29,790
Trade and other receivables	7,079	7,091	7,269	7,482	7,647
Prepayments	-	-	-	-	-
Other financial assets	250	250	250	250	250
Non-current assets classified as held for sale	-	-	-	-	-
Other assets	33	33	33	34	34
Total current assets	29,584	29,804	31,495	34,157	37,721
Non-current assets					
Trade and other receivables	456	365	292	234	187
Other financial assets	5	5	5	5	5
Investments in associates and joint arrangement and subsidiaries	1,650	1,650	1,650	1,650	1,650
Property, infrastructure, plant & equipment	1,065,188	1,064,636	1,063,132	1,061,196	1,059,720
Right-of-use assets	1,865	1,294	1,739	1,432	1,351
Investment property	-	-	-	-	-
Intangible assets	-	-	-	-	-
Total non-current assets	1,069,164	1,067,950	1,066,818	1,064,517	1,062,913
Total assets	1,098,748	1,097,754	1,098,313	1,098,674	1,100,634
Current liabilities					
Trade and other payables	5,999	6,198	6,383	6,634	6,776
Trust funds and deposits	3,729	3,729	3,729	3,729	3,729
Provisions	8,506	8,665	8,827	8,992	9,161
Contract and other liabilities	802	286	222	222	222
Interest-bearing liabilities	3,028	2,947	2,759	1,696	1,774
Lease liabilities	321	721	615	621	508
Total current liabilities	22,385	22,546	22,535	21,894	22,170
Non-current liabilities					
Provisions	15,764	15,216	14,668	14,121	13,574
Interest-bearing liabilities	13,392	10,445	7,686	5,990	4,217
Lease liabilities	1,544	573	1,124	810	843
Total non-current liabilities	30,700	26,234	23,478	20,921	18,634
Total liabilities	53,085	48,780	46,013	42,815	40,804
Net assets	1,045,663	1,048,974	1,052,300	1,055,859	1,059,830
Equity					
Accumulated surplus	421,333	424,435	427,550	430,900	434,660
Reserves	624,330	624,539	624,750	624,959	625,170
Total equity	1,045,663	1,048,974	1,052,300	1,055,859	1,059,830

Balance Sheet Forward Estimates

For the five years ending 30 June 2035

	Financial Plan Projections				
	2030-31 \$'000	2031-32 \$'000	2032-33 \$'000	2033-34 \$'000	2034-35 \$'000
Current assets					
Cash and cash equivalents	33,277	37,367	41,249	45,781	50,995
Trade and other receivables	7,876	8,110	8,355	8,608	8,831
Prepayments	-	-	-	-	-
Other financial assets	250	250	250	250	250
Non-current assets classified as held for sale	-	-	-	-	-
Other assets	34	35	35	35	36
Total current assets	41,437	45,762	49,889	54,674	60,112
Non-current assets					
Trade and other receivables	150	120	96	77	61
Other financial assets	5	5	5	5	5
Investments in associates and joint arrangement and subsidiaries	1,650	1,650	1,650	1,650	1,650
Property, infrastructure, plant & equipment	1,058,854	1,058,694	1,059,288	1,060,501	1,062,489
Right-of-use assets	1,098	1,613	1,244	1,109	1,109
Investment property	-	-	-	-	-
Intangible assets	-	-	-	-	-
Total non-current assets	1,061,757	1,062,082	1,062,283	1,063,342	1,065,314
Total assets	1,103,194	1,107,844	1,112,172	1,118,016	1,125,426
Current liabilities					
Trade and other payables	6,988	7,195	7,461	7,632	7,864
Trust funds and deposits	3,729	3,729	3,729	3,729	3,729
Provisions	9,333	9,508	9,687	9,870	10,056
Contract and other liabilities	222	222	222	222	222
Interest-bearing liabilities	1,308	1,170	1,231	248	260
Lease liabilities	508	508	508	508	508
Total current liabilities	22,088	22,332	22,838	22,209	22,639
Non-current liabilities					
Provisions	13,027	12,481	11,935	11,389	10,844
Interest-bearing loans and borrowings	2,909	1,739	508	260	-
Lease liabilities	590	1,105	735	601	601
Total non-current liabilities	16,526	15,325	13,178	12,250	11,445
Total liabilities	38,614	37,657	36,016	34,459	34,084
Net assets	1,064,580	1,070,187	1,076,156	1,083,557	1,091,342
Equity					
Accumulated surplus	439,200	444,597	450,356	457,547	465,122
Reserves	625,380	625,590	625,800	626,010	626,220
Total equity	1,064,580	1,070,187	1,076,156	1,083,557	1,091,342

Statement of Changes in Equity

For the five years ending 30 June 2030

* Balances at the end of the financial year may be subject to rounding differences.

	Total \$'000	Accum Surplus \$'000	Revaluation Reserve \$'000	Other Reserves \$'000
2025 Forecast Actual				
Balance at beginning of the financial year	1,025,902	399,771	590,134	35,997
Surplus / (deficit) for the year	15,795	15,795	-	-
Net asset revaluation gain / (loss)	20,600	-	20,600	-
Transfer to other reserves	2,276	-	-	2,276
Transfer from other reserves	(22,876)	-	-	(22,876)
Balance at end of the financial year	1,041,697	415,566	610,734	15,397
2026				
Balance at beginning of the financial year	1,041,697	415,566	610,734	15,397
Surplus / (deficit) for the year	5,769	5,769	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	2,276	-	-	2,276
Transfer from other reserves	(4,079)	-	-	(4,079)
Balance at end of the financial year	1,045,663	421,335	610,734	13,594
2027				
Balance at beginning of the financial year	1,045,663	421,335	610,734	13,594
Surplus / (deficit) for the year	3,101	3,101	-	-
Net asset revaluation increment / (decrement)	-	-	-	-
Transfer to other reserves	2,290	-	-	2,290
Transfer from other reserves	(2,080)	-	-	(2,080)
Balance at end of the financial year	1,048,974	424,436	610,734	13,804
2028				
Balance at beginning of the financial year	1,048,974	424,436	610,734	13,804
Surplus / (deficit) for the year	3,116	3,116	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	1,527	-	-	1,527
Transfer from other reserves	(1,317)	-	-	(1,317)
Balance at end of the financial year	1,052,300	427,552	610,734	14,014
2029				
Balance at beginning of the financial year	1,052,300	427,552	610,734	14,014
Surplus / (deficit) for the year	3,349	3,349	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	527	-	-	527
Transfer from other reserves	(317)	-	-	(317)
Balance at end of the financial year	1,055,859	430,901	610,734	14,224
2030				
Balance at beginning of the financial year	1,055,859	430,901	610,734	14,224
Surplus / (deficit) for the year	3,761	3,761	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	527	-	-	527
Transfer from other reserves	(317)	-	-	(317)
Balance at end of the financial year	1,059,830	434,662	610,734	14,434

Statement of Changes in Equity Forward Estimates

For the five years ending 30 June 2035

* Balances at the end of the financial year may be subject to rounding differences.

	Total \$'000	Accum Surplus \$'000	Revaluation Reserve \$'000	Other Reserves \$'000
2031				
Balance at beginning of the financial year	1,059,830	434,662	610,734	14,434
Surplus / (deficit) for the year	4,539	4,539	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	527	-	-	527
Transfer from other reserves	(316)	-	-	(316)
Balance at end of the financial year	1,064,580	439,201	610,734	14,645
2032				
Balance at beginning of the financial year	1,064,580	439,201	610,734	14,645
Surplus / (deficit) for the year	5,397	5,397	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	527	-	-	527
Transfer from other reserves	(317)	-	-	(317)
Balance at end of the financial year	1,070,187	444,598	610,734	14,855
2033				
Balance at beginning of the financial year	1,070,187	444,598	610,734	14,855
Surplus / (deficit) for the year	5,759	5,759	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	527	-	-	527
Transfer from other reserves	(317)	-	-	(317)
Balance at end of the financial year	1,076,156	450,357	610,734	15,065
2034				
Balance at beginning of the financial year	1,076,156	450,357	610,734	15,065
Surplus / (deficit) for the year	7,191	7,191	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	527	-	-	527
Transfer from other reserves	(317)	-	-	(317)
Balance at end of the financial year	1,083,557	457,548	610,734	15,275
2035				
Balance at beginning of the financial year	1,083,557	457,548	610,734	15,275
Surplus / (deficit) for the year	7,575	7,575	-	-
Net asset revaluation gain / (loss)	-	-	-	-
Transfer to other reserves	527	-	-	527
Transfer from other reserves	(317)	-	-	(317)
Balance at end of the financial year	1,091,342	465,123	610,734	15,485

Statement Cash Flows

For the five years ending 30 June 2030

* Balances at the end of the financial year may be subject to rounding differences.

	Financial Plan Projections				
	2025-26	2026-27	2027-28	2028-29	2029-30
	\$'000	\$'000	\$'000	\$'000	\$'000
	Inflows / (Outflows)	Inflows / (Outflows)	Inflows / (Outflows)	Inflows / (Outflows)	Inflows / (Outflows)
Cash flows from operating activities					
Rates and charges	83,931	86,318	88,752	91,382	93,236
Statutory fees and fines	2,105	2,139	2,195	2,259	2,330
User fees	19,295	19,844	20,431	21,042	21,677
Grants - operating	5,487	5,818	6,078	6,272	6,464
Grants - capital	4,211	1,490	1,418	1,467	1,470
Contributions - monetary	104	107	110	113	116
Interest received	1,350	1,283	1,218	1,218	1,218
Dividends received	-	-	-	-	-
Trust funds and deposits taken	-	-	-	-	-
Other receipts	728	751	773	796	820
Net GST refund / payment	-	-	-	-	-
Employee costs	(43,551)	(44,999)	(46,461)	(47,853)	(49,287)
Materials and services	(52,924)	(48,128)	(49,577)	(50,959)	(52,554)
Trust funds and deposits repaid	-	-	-	-	-
Other payments	(6,208)	(6,554)	(6,688)	(7,616)	(7,205)
Net cash provided by / (used in) operating activities	14,529	18,068	18,250	18,122	18,285
Cash flows from investing activities					
Payments for property, infrastructure, plant and equipment	(21,600)	(13,526)	(12,888)	(11,991)	(12,482)
Proceeds from sale of property, infrastructure, plant and equipment	271	91	427	159	269
Payments for investments	-	-	-	-	-
Proceeds from sale of investments	-	-	-	-	-
Loan and advances made	-	-	-	-	-
Payments of loans and advances	-	-	-	-	-
Net cash provided by / (used in) investing activities	(21,329)	(13,435)	(12,461)	(11,832)	(12,213)
Cash flows from financing activities					
Finance costs	(800)	(759)	(608)	(467)	(355)
Proceeds from borrowings	2,100	-	-	-	-
Repayment of borrowings	(2,746)	(3,028)	(2,947)	(2,759)	(1,696)
Interest paid - lease liability	(204)	(182)	(178)	(141)	(102)
Repayment of lease liabilities	(572)	(456)	(542)	(475)	(519)
Net cash provided by / (used in) financing activities	(2,223)	(4,425)	(4,276)	(3,842)	(2,672)
Net increase / (decrease) in cash & cash equivalents	(9,023)	208	1,513	2,448	3,401
Cash and cash equivalents at the beginning of the financial year	31,245	22,222	22,430	23,943	26,391
Cash and cash equivalents at the end of the financial year	22,222	22,430	23,943	26,391	29,792

Statement of Cash Flows Forward Estimates

For the five years ending 30 June 2035

* Balances at the end of the financial year may be subject to rounding differences.

	Financial Plan Projections				
	2030-31	2031-32	2032-33	2033-34	2034-35
	\$'000	\$'000	\$'000	\$'000	\$'000
	Inflows /	Inflows /	Inflows /	Inflows /	Inflows /
	(Outflows)	(Outflows)	(Outflows)	(Outflows)	(Outflows)
Cash flows from operating activities					
Rates and charges	96,041	98,960	102,017	105,185	107,855
Statutory fees and fines	2,397	2,469	2,543	2,619	2,700
User fees	22,324	22,993	23,684	24,393	25,128
Grants - operating	6,655	6,854	7,060	7,271	7,491
Grants - capital	1,467	1,466	1,466	1,465	1,467
Contributions - monetary	120	124	127	131	135
Interest received	1,224	1,231	1,237	1,243	1,249
Dividends received	-	-	-	-	-
Trust funds and deposits taken	-	-	-	-	-
Other receipts	845	869	896	923	951
Net GST refund / payment	-	-	-	-	-
Employee costs	(50,765)	(52,287)	(53,854)	(55,469)	(57,132)
Materials and services	(54,022)	(55,604)	(57,176)	(58,941)	(60,612)
Trust funds and deposits repaid	-	-	-	-	-
Other payments	(7,552)	(7,794)	(8,643)	(8,338)	(8,604)
Net cash provided by / (used in) operating activities	18,734	19,281	19,357	20,482	20,628
Cash flows from investing activities					
Payments for property, infrastructure, plant and equipment	(12,984)	(13,288)	(13,736)	(14,497)	(14,711)
Proceeds from sale of property, infrastructure, plant and equipment	289	102	63	350	72
Payments for investments	-	-	-	-	-
Proceeds from sale of investments	-	-	-	-	-
Loan and advances made	-	-	-	-	-
Payments of loans and advances	-	-	-	-	-
Net cash provided by / (used in) investing activities	(12,695)	(13,186)	(13,673)	(14,147)	(14,639)
Cash flows from financing activities					
Finance costs	(271)	(190)	(125)	(64)	(20)
Proceeds from borrowings	-	-	-	-	-
Repayment of borrowings	(1,774)	(1,308)	(1,170)	(1,231)	(248)
Interest paid - lease liability	(77)	(77)	(77)	(77)	(77)
Repayment of lease liabilities	(431)	(431)	(431)	(431)	(431)
Net cash provided by / (used in) financing activities	(2,553)	(2,006)	(1,803)	(1,803)	(776)
Net increase / (decrease) in cash & cash equivalents	3,487	4,090	3,882	4,532	5,214
Cash and cash equivalents at the beginning of the financial year	29,790	33,277	37,367	41,249	45,781
Cash and cash equivalents at the end of the financial year	33,277	37,367	41,249	45,781	50,995

Statement of Capital Works

For the five years ending 30 June 2030

Financial Plan Projections

	2025-26	2026-27	2027-28	2028-29	2029-30
	\$'000	\$'000	\$'000	\$'000	\$'000
Property					
Land	-	-	-	-	-
Land improvements	-	-	-	-	-
Total land	-	-	-	-	-
Buildings	4,178	2,250	2,320	2,480	2,558
Heritage buildings	-	-	-	-	-
Building improvements	-	-	-	-	-
Leasehold improvements	-	-	-	-	-
Total buildings	4,178	2,250	2,320	2,480	2,558
Total property	4,178	2,250	2,320	2,480	2,558
Plant and equipment					
Heritage plant and equipment	-	-	-	-	-
Plant, machinery and equipment	1,614	469	1,896	480	1,493
Fixtures, fittings and furniture	-	-	-	-	-
Computers and telecommunications	-	-	-	-	-
Library books	-	-	-	-	-
Total plant and equipment	1,614	469	1,896	480	1,493
Infrastructure					
Roads	2,830	2,880	2,940	3,020	3,070
Bridges	285	2,160	560	175	200
Footpaths and cycleways	630	580	580	620	650
Drainage	950	1,050	1,100	1,200	1,100
Recreational, leisure and community facilities	6,973	1,738	1,565	2,605	1,385
Waste management	2,792	1,763	1,000	-	-
Parks, open space and streetscapes	635	640	680	765	790
Aerodromes	-	-	-	-	-
Off street car parks	-	-	-	-	-
Other infrastructure	570	605	890	1,270	1,878
Total infrastructure	15,666	11,416	9,316	9,655	9,073
Total capital works expenditure	21,457	14,135	13,532	12,614	13,124
Represented by:					
New asset expenditure	2,645	2,563	960	630	610
Asset renewal expenditure	9,774	6,054	7,364	6,417	7,886
Asset expansion expenditure	1,956	-	-	-	-
Asset upgrade expenditure	7,108	5,518	5,208	5,567	4,628
Total capital works expenditure	21,484	14,135	13,532	12,614	13,124
Funding sources represented by:					
Grants	5,348	1,904	1,478	1,478	1,478
Contributions	-	-	-	-	-
Council cash	14,036	12,231	12,054	11,136	11,646
Borrowings	2,100	-	-	-	-
Total capital works expenditure	21,484	14,135	13,532	12,614	13,124

Statement of Capital Works Forward Estimates

For the five years ending 30 June 2035

	Financial Plan Projections				
	2030-31 \$'000	2031-32 \$'000	2032-33 \$'000	2033-34 \$'000	2034-35 \$'000
Property					
Land	-	-	-	-	-
Land improvements	-	-	-	-	-
Total land	-	-	-	-	-
Buildings	2,655	3,260	3,405	3,595	2,558
Heritage buildings	-	-	-	-	-
Building improvements	-	-	-	-	-
Leasehold improvements	-	-	-	-	-
Total buildings	2,655	3,260	3,405	3,595	2,558
Total property	2,655	3,260	3,405	3,595	2,558
Plant and equipment					
Heritage plant and equipment	-	-	-	-	-
Plant, machinery and equipment	1,192	580	240	1,302	1,493
Fixtures, fittings and furniture	-	-	-	-	-
Computers and telecommunications	-	-	-	-	-
Library books	-	-	-	-	-
Total plant and equipment	1,192	580	240	1,302	1,493
Infrastructure					
Roads	3,120	3,290	3,450	3,450	3,070
Bridges	200	200	220	230	200
Footpaths and cycleways	650	695	830	850	650
Drainage	1,200	1,200	1,300	1,300	1,100
Recreational, leisure and community facilities	1,440	1,445	1,530	1,625	1,385
Waste management	-	-	-	-	-
Parks, open space and streetscapes	815	820	870	940	790
Aerodromes	-	-	-	-	-
Off street car parks	-	-	-	-	-
Other infrastructure	2,372	2,467	2,573	1,913	1,878
Total infrastructure	9,797	10,117	10,773	10,308	9,073
Total capital works expenditure	13,644	13,957	14,418	15,205	13,124
Represented by:					
New asset expenditure	610	645	740	790	610
Asset renewal expenditure	8,057	8,138	8,301	9,136	7,886
Asset expansion expenditure	-	-	-	-	-
Asset upgrade expenditure	4,977	5,175	5,377	5,279	4,628
Total capital works expenditure	13,644	13,957	14,418	15,205	13,124
Funding sources represented by:					
Grants	1,478	1,478	1,478	1,478	1,478
Contributions	-	-	-	-	-
Council cash	12,166	12,479	12,940	13,727	13,949
Total capital works expenditure	13,644	13,957	14,418	15,205	15,427

For the five years ending 30 June 2030

Financial Plan Projections					
	2025-26	2026-27	2027-28	2028-29	2029-30
	\$'000	\$'000	\$'000	\$'000	\$'000
Staff expenditure					
Employee costs - operating	42,429	43,702	45,013	46,364	47,755
Employee costs - capital	-	-	-	-	-
	EFT	EFT	EFT	EFT	EFT
Permanent EFT numbers	333.31	333.31	333.31	333.31	333.31
Limited tenures	2.00	2.00	2.00	2.00	2.00
Total staff numbers	335.31	335.31	335.31	335.31	335.31

Statement of Human Resources Forward Estimates

For the five years ending 30 June 2035

Financial Plan Projections					
	2030-31	2031-32	2032-33	2033-34	2034-35
	\$'000	\$'000	\$'000	\$'000	\$'000
Staff expenditure					
Employee costs - operating	49,187	50,663	52,183	53,748	55,361
Employee costs - capital	-	-	-	-	-
	EFT	EFT	EFT	EFT	EFT
Permanent EFT numbers	333.31	333.31	333.31	333.31	333.31
Limited tenures	2.00	2.00	2.00	2.00	2.00
Total staff numbers	335.31	335.31	335.31	335.31	335.31

A summary of human resources expenditure categorised according to the organisational structure of Council is included below:

Directorate	Composition				
	Budget	Permanent		Casual	Temp
	2025-26	Full time	Part time		
	\$'000	\$'000	\$'000	\$'000	\$'000
Operations	13,695	13,545	150	-	-
Planning, Environment and Strategy	9,026	8,141	885	-	-
Community Services	7,535	4,064	3,203	-	268
Culture and Performance	5,362	4,340	1,022	-	-
Governance, Communications and	6,812	5,372	1,440	-	-
Total expenditure	42,429	35,462	6,700	-	268

A summary of the number of full time equivalent (FTE) Council staff in relation to the above expenditure is

Directorate	Compositio			
	Budget	Permanent		Temp
	2025-26	Full time	Part time	
Operations	113.60	112.00	1.60	-
Planning, Environment and Strategy	69.02	61.00	8.02	-
Community Services	57.50	29.00	26.50	2.00
Culture and Performance	41.40	32.00	9.40	-
Governance, Communications and	53.79	38.00	15.79	-
Total staff	335.31	272.00	61.31	2.00

Summary of Planned Human Resources Expenditure

For the five years ending 30 June 2030

	Budget	Projections			
	2025-26	2026-27	2027-28	2028-29	2029-30
	\$'000	\$'000	\$'000	\$'000	\$'000
Operations					
Permanent - Full time	13,545	13,951	14,370	14,801	15,245
Female	4,528	4,664	4,804	4,948	5,096
Male	9,017	9,287	9,566	9,853	10,149
Self-described gender	-	-	-	-	-
Permanent - Part time	150	155	159	163	167
Female	45	46	47	48	49
Male	106	109	112	115	118
Self-described gender	-	-	-	-	-
Total Operations	13,696	14,106	14,529	14,964	15,412
Planning, Environment and Strategy					
Permanent - Full time	8,141	8,385	8,636	8,895	9,162
Female	3,993	4,113	4,236	4,363	4,494
Male	4,043	4,165	4,290	4,419	4,552
Self-described gender	104	107	110	113	116
Permanent - Part time	885	911	938	966	995
Female	787	811	835	860	886
Male	97	100	103	106	109
Self-described gender	-	-	-	-	-
Total Planning, Environment and Strategy	9,026	9,296	9,574	9,861	10,157
Community Services					
Permanent - Full time	4,064	4,187	4,313	4,442	4,575
Female	3,205	3,301	3,400	3,502	3,607
Male	735	757	780	803	827
Self-described gender	125	129	133	137	141
Permanent - Part time	3,470	3,574	3,681	3,791	3,905
Female	3,470	3,574	3,681	3,791	3,905
Male	-	-	-	-	-
Self-described gender	-	-	-	-	-
Total Community Services	7,534	7,761	7,994	8,233	8,480
Culture and Performance					
Permanent - Full time	4,256	4,384	4,515	4,651	4,790
Female	1,753	1,805	1,859	1,915	1,972
Male	2,504	2,579	2,656	2,736	2,818
Self-described gender	-	-	-	-	-
Permanent - Part time	1,022	1,053	1,084	1,117	1,151
Female	814	839	864	890	917
Male	208	214	220	227	234
Self-described gender	-	-	-	-	-
Total Culture and Performance	5,278	5,437	5,599	5,768	5,941
Governance, Communications and Community Safety					
Permanent - Full time	5,353	5,514	5,680	5,851	6,026
Female	4,008	4,128	4,252	4,380	4,511
Male	1,345	1,386	1,428	1,471	1,515
Self-described gender	-	-	-	-	-
Permanent - Part time	1,440	1,483	1,528	1,574	1,621
Female	989	1,019	1,050	1,082	1,114
Male	451	464	478	492	507
Self-described gender	-	-	-	-	-
Total Governance, Communications and Community Safety	6,793	6,997	7,208	7,425	7,647

Summary of Planned Human Resources Expenditure

For the five years ending 30 June 2035

	Forward Estimates				
	2030-31 \$'000	2031-32 \$'000	2032-33 \$'000	2033-34 \$'000	2034-35 \$'000
Operations					
Permanent - Full time	15,702	16,173	16,658	17,158	17,673
Female	5,249	5,406	5,568	5,735	5,907
Male	10,453	10,767	11,090	11,423	11,766
Self-described gender	-	-	-	-	-
Permanent - Part time	172	178	184	190	196
Female	50	52	54	56	58
Male	122	126	130	134	138
Self-described gender	-	-	-	-	-
Total Operations	15,874	16,351	16,842	17,348	17,869
Planning, Environment and Strategy					
Permanent - Full time	9,437	9,721	10,013	10,313	10,623
Female	4,629	4,768	4,911	5,058	5,210
Male	4,689	4,830	4,975	5,124	5,278
Self-described gender	119	123	127	131	135
Permanent - Part time	1,020	1,043	1,067	1,091	1,124
Female	908	928	949	970	999
Male	112	115	118	121	125
Self-described gender	-	-	-	-	-
Total Planning, Environment and Strategy	10,457	10,764	11,080	11,404	11,747
Community Services					
Permanent - Full time	4,712	4,853	4,998	5,148	5,303
Female	3,715	3,826	3,941	4,059	4,181
Male	852	878	904	931	959
Self-described gender	145	149	153	158	163
Permanent - Part time	4,022	4,143	4,267	4,395	4,527
Female	4,022	4,143	4,267	4,395	4,527
Male	-	-	-	-	-
Self-described gender	-	-	-	-	-
Total Community Services	8,734	8,996	9,265	9,543	9,830
Culture and Performance					
Permanent - Full time	4,934	5,082	5,235	5,392	5,554
Female	2,031	2,092	2,155	2,220	2,287
Male	2,903	2,990	3,080	3,172	3,267
Self-described gender	-	-	-	-	-
Permanent - Part time	1,186	1,221	1,257	1,295	1,334
Female	945	973	1,002	1,032	1,063
Male	241	248	255	263	271
Self-described gender	-	-	-	-	-
Total Culture and Performance	6,120	6,303	6,492	6,687	6,888
Governance, Communications and Community Safety					
Permanent - Full time	6,206	6,392	6,584	6,782	6,985
Female	4,646	4,785	4,929	5,077	5,229
Male	1,560	1,607	1,655	1,705	1,756
Self-described gender	-	-	-	-	-
Permanent - Part time	1,669	1,719	1,770	1,823	1,878
Female	1,147	1,181	1,216	1,252	1,290
Male	522	538	554	571	588
Self-described gender	-	-	-	-	-
Total Governance, Communications and Community Safety	7,875	8,111	8,354	8,605	8,863

Summary of Planned Human Resources Expenditure

For the five years ending 30 June 2030

	Budget	Projections			
	2025-26	2026-27	2027-28	2028-29	2029-30
	FTE	FTE	FTE	FTE	FTE
Operations					
Permanent - Full time	112.00	112.00	112.00	112.00	112.00
Female	35.00	35.00	35.00	35.00	35.00
Male	77.00	77.00	77.00	77.00	77.00
Self-described gender	-	-	-	-	-
Permanent - Part time	1.60	1.10	1.10	1.10	1.10
Female	1	-	-	-	-
Male	1.10	1.10	1.10	1.10	1.10
Self-described gender	-	-	-	-	-
Total Operations	113.60	113.10	113.10	113.10	113.10
Planning, Environment and Strategy					
Permanent - Full time	61.00	61.00	61.00	61.00	61.00
Female	30.00	30.00	30.00	30.00	30.00
Male	30.00	30.00	30.00	30.00	30.00
Self-described gender	1.00	1.00	1.00	1.00	1.00
Permanent - Part time	8.02	8.02	8.02	8.02	8.02
Female	7.13	7.13	7.13	7.13	7.13
Male	0.89	0.89	0.89	0.89	0.89
Self-described gender	-	-	-	-	-
Total Planning, Environment and Strategy	69.02	69.02	69.02	69.02	69.02
Community Services					
Permanent - Full time	29.00	29.00	29.00	29.00	29.00
Female	22.00	22.00	22.00	22.00	22.00
Male	6.00	6.00	6.00	6.00	6.00
Self-described gender	1.00	1.00	1.00	1.00	1.00
Permanent - Part time	28.50	28.50	28.50	28.50	28.50
Female	28.50	28.50	28.50	28.50	28.50
Male	-	-	-	-	-
Self-described gender	-	-	-	-	-
Total Community Services	57.50	57.50	57.50	57.50	57.50
Culture and Performance					
Permanent - Full time	32.00	32.00	32.00	32.00	32.00
Female	15.00	15.00	15.00	15.00	15.00
Male	17.00	17.00	17.00	17.00	17.00
Self-described gender	-	-	-	-	-
Permanent - Part time	9.40	9.40	9.40	9.40	9.40
Female	7.40	7.40	7.40	7.40	7.40
Male	2	2	2	2	2
Self-described gender	-	-	-	-	-
Total Culture and Performance	41.40	41.40	41.40	41.40	41.40
Governance, Communications and Community Safety					
Permanent - Full time	38.00	38.00	38.00	38.00	38.00
Female	30.00	30.00	30.00	30.00	30.00
Male	8.00	8.00	8.00	8.00	8.00
Self-described gender	-	-	-	-	-
Permanent - Part time	15.79	15.79	15.79	15.79	15.79
Female	10.49	10.49	10.49	10.49	10.49
Male	5	5	5	5	5
Self-described gender	-	-	-	-	-
Total Governance, Communications and Community Safety	53.79	53.79	53.79	53.79	53.79

Summary of Planned Human Resources Expenditure

For the five years ending 30 June 2035

	Forward Estimates				
	2030-31 FTE	2031-32 FTE	2032-33 FTE	2033-34 FTE	2034-35 FTE
Operations					
Permanent - Full time	112.00	112.00	112.00	112.00	112.00
Female	35.00	35.00	35.00	35.00	35.00
Male	77.00	77.00	77.00	77.00	77.00
Self-described gender	-	-	-	-	-
Permanent - Part time	1.10	1.10	1.10	1.10	1.10
Female	-	-	-	-	-
Male	1.10	1.10	1.10	1.10	1.10
Self-described gender	-	-	-	-	-
Total Operations	113.10	113.10	113.10	113.10	113.10
Planning, Environment and Strategy					
Permanent - Full time	61.00	61.00	61.00	61.00	61.00
Female	30.00	30.00	30.00	30.00	30.00
Male	30.00	30.00	30.00	30.00	30.00
Self-described gender	1.00	1.00	1.00	1.00	1.00
Permanent - Part time	8.02	8.02	8.02	8.02	8.02
Female	7.13	7.13	7.13	7.13	7.13
Male	0.89	0.89	0.89	0.89	0.89
Self-described gender	-	-	-	-	-
Total Planning, Environment and Strategy	69.02	69.02	69.02	69.02	69.02
Community Services					
Permanent - Full time	29.00	29.00	29.00	29.00	29.00
Female	22.00	22.00	22.00	22.00	22.00
Male	6.00	6.00	6.00	6.00	6.00
Self-described gender	1.00	1.00	1.00	1.00	1.00
Permanent - Part time	28.50	28.50	28.50	28.50	28.50
Female	28.50	28.50	28.50	28.50	28.50
Male	-	-	-	-	-
Self-described gender	-	-	-	-	-
Total Community Services	57.50	57.50	57.50	57.50	57.50
Culture and Performance					
Permanent - Full time	32.00	32.00	32.00	32.00	32.00
Female	15.00	15.00	15.00	15.00	15.00
Male	17.00	17.00	17.00	17.00	17.00
Self-described gender	-	-	-	-	-
Permanent - Part time	9.40	9.40	9.40	9.40	9.40
Female	7.40	7.40	7.40	7.40	7.40
Male	2	2	2	2	2
Self-described gender	-	-	-	-	-
Total Culture and Performance	41.40	41.40	41.40	41.40	41.40
Governance, Communications and Community Safety					
Permanent - Full time	38.00	38.00	38.00	38.00	38.00
Female	30.00	30.00	30.00	30.00	30.00
Male	8.00	8.00	8.00	8.00	8.00
Self-described gender	-	-	-	-	-
Permanent - Part time	15.79	15.79	15.79	15.79	15.79
Female	10.49	10.49	10.49	10.49	10.49
Male	5	5	5	5	5
Self-described gender	-	-	-	-	-
Total Governance, Communications and Community Safety	53.79	53.79	53.79	53.79	53.79

4. Financial performance indicators

The following table highlights Council's projected performance across a range of key financial performance indicators. These indicators provide an analysis of Council's 10 year financial projections and should be interpreted in the context of the organisation's objectives and financial management principles.

Indicator	Measure	Notes											Trend	
			2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	+o/-	
Operating position														
Adjusted underlying result	Adjusted underlying surplus (deficit) / Adjusted underlying revenue	1	0.28%	0.94%	1.28%	1.43%	1.72%	2.27%	2.84%	3.02%	3.93%	4.10%	o	
Liquidity														
Working Capital	Current assets / current liabilities	2	132.2%	132.2%	139.8%	156.0%	170.1%	187.6%	204.9%	218.4%	246.2%	265.5%	o	
Obligations														
Loans and borrowings	Interest bearing loans and borrowings / rate revenue	4	19.7%	15.5%	11.8%	8.4%	6.4%	4.4%	2.9%	1.7%	0.5%	0.2%	+	
Loans and borrowings	Interest and principal repayments on interest bearing loans and borrowings / rate revenue		4.3%	4.4%	4.0%	3.5%	2.2%	2.1%	1.5%	1.3%	1.2%	0.2%	+	
Indebtedness	Non-current liabilities / own source revenue		28.7%	23.8%	20.7%	17.9%	15.6%	13.4%	12.1%	10.1%	9.1%	8.3%	+	
Asset renewal	Asset renewal and upgrade expense / Asset depreciation	5	117.6%	81.5%	88.7%	85.8%	90.1%	94.7%	98.3%	103.0%	109.7%	97.3%	-	
Stability														
Rates concentration	Rate revenue / adjusted underlying revenue	6	74.1%	74.2%	74.3%	74.3%	74.2%	74.2%	74.2%	74.2%	74.3%	74.2%	o	
Rates effort	Rate revenue / CIV of rateable properties in the municipality		0.31%	0.31%	0.32%	0.33%	0.33%	0.34%	0.35%	0.36%	0.36%	0.37%	o	

Key to Forecast Trend:

- + Forecasts improvement in Council's financial performance/financial position indicator
- o Forecasts that Council's financial performance/financial position indicator will be steady
- Forecasts deterioration in Council's financial performance/financial position indicator

Indicator	Measure	Notes											Trend
			2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	+o/-
Efficiency													
Expenditure level	Total expenses/ no. of property		\$4,622	\$4,715	\$4,810	\$4,919	\$4,988	\$5,083	\$5,179	\$5,300	\$5,382	\$5,486	o
Revenue level	Total rate revenue / no. of property assessments		\$3,397	\$3,499	\$3,604	\$3,712	\$3,823	\$3,938	\$4,056	\$4,178	\$4,303	\$4,432	o
Workforce turnover	No. of permanent staff resignations & terminations / average no. of permanent staff for the financial year		10.0%	10.0%	10.0%	10.0%	10.0%	10.0%	10.0%	10.0%	10.0%	10.0%	o
Sustainable Capacity													
Population	Total expenses/ Municipal population		\$1,730	\$1,766	\$1,804	\$1,847	\$1,874	\$1,912	\$1,949	\$1,997	\$2,030	\$2,071	o
Population	Value of infrastructure / Municipal population		\$16,420	\$16,340	\$16,246	\$16,147	\$16,055	\$15,973	\$15,903	\$15,844	\$15,795	\$15,759	o
Population	Municipal population / Kilometres of local roads		83.60	83.96	84.33	84.69	85.06	85.43	85.79	86.16	86.52	86.88	o
Own-source revenue	Own source revenue / Municipal population		\$1,646	\$1,692	\$1,734	\$1,778	\$1,809	\$1,855	\$1,903	\$1,953	\$2,004	\$2,048	o
Recurrent grants	Recurrent grants / Municipal population		\$89	\$91	\$93	\$96	\$98	\$101	\$103	\$106	\$108	\$111	o

Key to Forecast Trend:

- + Forecasts improvement in Council's financial performance/financial position indicator
- o Forecasts that Council's financial performance/financial position indicator will be steady
- Forecasts deterioration in Council's financial performance/financial position indicator

Notes to indicators

1. Adjusted underlying result

An indicator of the sustainable operating result required to enable Council to continue to provide core services and meet its objectives. Improvement in financial performance expected over the period. Council is projecting to achieve surpluses and projected financial sustainability remains a priority and challenge for Council.

2. Working Capital

The proportion of current liabilities represented by current assets. The working capital forecast remains steady, Council will continue to maintain the ability to service short term obligations. The working capital indicator is showing Council will be able to service its projected short-term obligations into the future. The result also considers specific purpose grant funding which contributes to the trend.

3. Debt compared to rates

The results illustrate Council's commitment to pay down existing loans.

4. Asset renewal

A strong focus is placed on Council's capital works program with asset renewal playing a significant role. The trend indicates Council will work towards increasing the amount of renewal spending to a sustainable level over the next ten years.

5. Rates concentration

Reflects extent of reliance on rate revenues to fund all of Council's on-going services. The trend indicates Council will have a continual reliance on rate revenue compared to all other revenue sources. No significant changes are projected to Council operations, with the reliance on rates projected to remain consistent indicating no significant growth in rateable assessments.

Calculation of Adjusted Underlying surplus / (deficit)

The following table shows how the adjusted underlying result has been calculated.

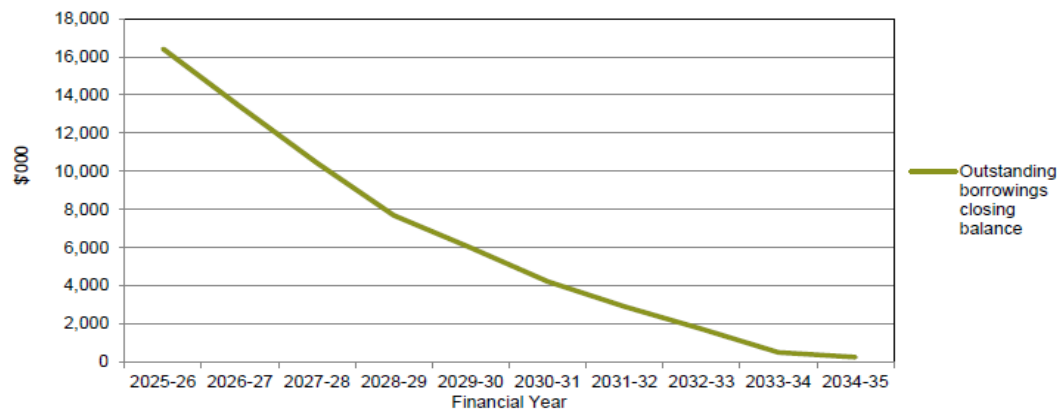
Adjusted Underlying Result	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35
	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
Total Income	117,985	118,188	121,144	124,706	127,448	131,263	135,172	139,250	143,466	147,184
Total expenses	112,216	115,087	118,028	121,357	123,687	126,724	129,775	133,491	136,275	139,609
Surplus/(deficit) for the year	5,769	3,101	3,116	3,349	3,761	4,539	5,397	5,759	7,191	7,575
Less non-operating income and expenses										
Grants - Capital (non-recurrent)	(5,348)	(1,904)	(1,478)	(1,478)	(1,478)	(1,478)	(1,478)	(1,478)	(1,478)	(1,478)
Contributions - monetary (capital)	(104)	(107)	(110)	(113)	(116)	(120)	(124)	(127)	(131)	(135)
Contributions - non-monetary	-	-	-	-	-	-	-	-	-	-
Adjusted underlying surplus/(deficit)	317	1,090	1,528	1,758	2,167	2,941	3,795	4,154	5,582	5,962

5. Strategies and Plans

This section describes the strategies and plans that support the 10 year financial projections included to the Financial Plan.

5.1 Borrowing Strategy

Council is anticipating to take out \$2.1 million dollars in new borrowings in 2025-2026 loan funds will be used to fund part of the new capital works program. Council has set aside \$1.33 million to enable Council to respond to potential Government grant funding opportunities. The graph below outlines Council's existing loan borrowings with the declining trend reflective of current repayment schedules. Borrowings remain within the Auditor-General's low risk range.



5.1.1 Current Debt Position

The anticipated total amount borrowed as at 30 June 2025 is 17.066 million.

5.1.2 Future Borrowing Requirements

		2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35
		\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
Opening balance		17,066	16,420	13,392	10,445	7,686	5,990	4,216	2,908	1,738	507
Plus New loans		2,100	-	-	-	-	-	-	-	-	-
Less Principal repayment		(2,746)	(3,028)	(2,947)	(2,759)	(1,696)	(1,774)	(1,308)	(1,170)	(1,231)	(248)
Closing balance		16,420	13,392	10,445	7,686	5,990	4,216	2,908	1,738	507	259
Interest payment		800	759	608	467	355	271	190	125	64	20
Borrowing Performance Indicators	Target	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35
Total borrowings / Rate revenue	Below 60%	19.70%	15.53%	11.76%	8.40%	6.42%	4.38%	2.93%	1.70%	0.48%	0.24%
Debt servicing / Rate revenue	Below 5%	4.25%	4.39%	4.00%	3.53%	2.20%	2.13%	1.51%	1.27%	1.23%	0.25%
Debt commitment / Rate revenue	Below 10%	4.25%	4.39%	4.00%	3.53%	2.20%	2.13%	1.51%	1.27%	1.23%	0.25%
Indebtedness / Own source revenue	Below 60%	28.75%	23.79%	20.69%	17.91%	15.61%	13.44%	12.09%	10.09%	9.10%	8.29%

5.2 Reserves Strategy

Council maintains statutory reserves and specific purpose discretionary reserves.

5.2.1 Current Reserves

Statutory reserves funds must be applied for specified statutory purposes in accordance with various legislative and contractual requirements.

- Car parks reserve - external developer contributions to undertake car park works
- Public open space reserve - external developer contributions for the acquisition of public open space
- Yarrambat drainage reserve - external developer contributions paid by developers to undertake drainage works as required
- Street light contribution - external developer contributions for street lighting as per planning permit conditions
- Street trees reserve - external developer contributions for planting trees as per planning permit conditions
- Development planning overlay open space reserve - external developer contributions for open space within DPO 1, 2 and 4
- Development planning overlay infrastructure reserve - external developer contributions for infrastructure works within DPO 1, 2 and 4
- Development contribution construction - funds paid by developers to undertake future works
- Native vegetation - external developer and private builder contributions set aside for native vegetation

Discretionary reserves relate to previous Council decisions regarding the future use of these funds.

- Cricket pitch replacement - club contributions for future cricket pitch replacement works
- Public arts program - funds the purchase of art works
- Leisure facilities - Council resolution in place for the replacement of Eltham North soccer pitch
- Bridgeford Estate - Funds bequeathed by the late Robert Bridgeford. These funds support local groups and organisations to implement projects that result in the betterment and advancement of indigenous people within the municipality of Nillumbik.

5.2.2 Reserve Usage Projections

Reserves	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35
	\$000's	\$000's	\$000's	\$000's	\$000's	\$000's	\$000's	\$000's	\$000's	\$000's
Statutory										
Carparks	97	97	97	97	97	97	97	97	97	97
Public open space	5,897	5,977	6,057	6,137	6,217	6,297	6,377	6,457	6,537	6,617
Yarrambat drainage	653	658	664	669	675	680	686	691	697	702
Street light contribution	28	28	28	28	28	28	28	28	28	28
Street trees	79	79	79	79	79	79	79	79	79	79
Development planning overlay - open space	4,737	4,797	4,856	4,916	4,975	5,035	5,094	5,154	5,213	5,273
Development planning overlay - infrastructure	757	812	867	922	978	1,033	1,088	1,143	1,199	1,254
Development contribution construction	196	201	205	209	213	217	222	226	230	234
Native vegetation	436	442	449	455	462	468	475	481	488	494
Discretionary										
Cricket Pitch Replacement	35	35	35	35	35	35	35	35	35	35
Public arts program	262	262	262	262	262	262	262	262	262	262
Leisure facilities	380	380	380	380	380	380	380	380	380	380
Bridgeford Estate	38	37	37	36	35	34	34	33	32	32

6. Glossary

Consumer Price Index

CPI is a measure of the average change over time in the prices paid by households for a fixed basket of goods and services. In Australia, the CPI measures the changes in the price of a fixed basket of goods and services, acquired by household consumers who are residents in the eight State/Territory capital cities.

Comprehensive income statement

The comprehensive income statement captures the financial performance of Council for each financial year ended 30 June. The performance is measured through capturing the value of all revenues (moneys earned or awarded through grants) and the value of all expenses (moneys spent in delivery of services or routine maintenance). The expenses captured do not include any costs associated with the purchase, renewal, upgrade or expansion of Council assets.

All revenue and expenses which are pertinent to the operations of the year are captured in the statement, which include revenue yet to be received or expenses yet to be paid. This approach is referred to as accrual based accounting and is in compliance with statutory accounting standards. Under the accrual based accounting, non-cash transactions may influence the overall performance of Council for the year.

The overall intent of the statement is to calculate if Council achieved a surplus or deficit for the year. This performance figure is calculated by deducting the total expenses from total revenues. While Council is a 'not-for-profit' organisation, the budget is established at the start of the year with a view of achieving a surplus to ensure future financial sustainability.

Balance sheet

The balance sheet provides a snapshot of the financial position of Council at the end of the year. The overall intent is to capture the net worth of Council. The balance sheet comprises of the three sections: assets (what Council owns or is owed), liabilities (what Council owes) and equity (what Council is worth which has built up over years).

The assets and liabilities are separated into current and non-current. Current refers to items falling due in the next 12 months, non-current refers to items held for a longer term than 12 months. The net current assets is an important measure of Council's ability to meet its debts as and when they fall due.

The equity section of the balance sheet captures Council's reserves and surpluses accumulated from prior years. The total equity represents the net financial worth of Council.

Statement of changes in equity

The statement of changes in equity provides a detailed breakdown of the amounts shown in the equity section of the balance sheet. The drivers for the movement in the amounts shown include:

- A surplus or deficit recorded in the comprehensive income statement
- The use of monies from reserves
- An increase in the value of non-current assets resulting from the revaluation of those assets.

Cash flow statement

The cash flow statement captures all cash amounts received and payments made during the year. This statement verifies the bank balance stated in the balance sheet through capturing all cash transactions under three types of activities:

- Cash flows from operating activities arising from delivering the various services of Council. The net result shows the ability to generate a cash surplus which can be directed to be used to fund the purchase of assets.
- Cash flows from investing activities arising from the purchase and sale of Council's non-current assets.
- Cash flows from financing activities arising from the raising of new borrowings and the respective repayment.

Statement of capital works

The statement of capital works details amounts incurred on capital works by class and type of asset. This statement captures the entire asset portfolio which Council owns and oversees for the safe enjoyment of the community.

Underlying surplus

Council's net operating surplus, after adding back external funding, including grants and contributions received.

Liquidity

A measure of Council's ability to use its current assets to meet its current or short-term liabilities.

Unrestricted cash

Council's cash and cash equivalents that are not subject to external restrictions and are available for operational use.

Asset renewal

Expenditure on an existing asset or on replacing an existing asset that returns the service capability of the asset to its original capability.

Capital outlay

Expenditure for the acquisition cost of capital assets, such as infrastructure, plant and equipment, or expenditures to make improvements to capital assets that materially increase their value or useful life.