



Draft Urban Forest Strategy 2020-2045 Via communityengagement@act.gov.au

# NPA ACT Submission on the Review of Tree Protection Act 2005: Discussion Paper October 2019

Thank you for the opportunity to comment on the draft Urban Forest Strategy 2020 - 2045 (the Strategy). The National Parks Association of the ACT (NPA ACT) is a community-based conservation organisation that has actively sought to protect our natural environment over the past 60 years. The NPA ACT was a key player in the creation of Namadgi National Park and maintains a strong on-going interest in Canberra Nature Park that adjoins much of the ACT's urban area.

#### **Summary**

The NPA ACT strongly supports the ACT Government for setting a target of 30% canopy cover and believes the Strategy sets a sound framework for this to be achieved. However, given the ACT's recognition of a climate change emergency and the important role that an urban forest can play in mitigating climate change effects, the NPA ACT would question whether the timeframe for achieving this goal is too long. The NPA ACT would therefore recommend that the ACT Government prioritise the achieving of the goals of the Strategy, and other climate change mitigation actions, within a much shorter timeframe.

The NPA ACT is particularly interested in conservation reserves. And, as connectivity between reserves is important in maintaining the health of the reserves, the NPA ACT is pleased to note the recognition within the Strategy of the importance of understorey plantings and no-mow areas to increase biodiversity. In particular, a restoration of habitats and tree planting on leased and public land should be planned to take into account the need for connectivity through corridors and other linkages between reserves.

Given the potential impacts of climate change, the choice of trees to be planted, and their ongoing care will be critical to the success of the Strategy.

The NPA ACT supports the use of offsets covering the removal of trees as identified in the Strategy.

While the canopy cover target of 30% is a target for the whole urban area, this should not mean that any suburban area is allowed to have a very small canopy cover, with the average achieved by a much greater canopy cover in other areas.

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Offsetting this is the need to recognise that some areas such as our important grasslands should be relatively treeless.

In supporting the direction of the Strategy, the NPA ACT also recommends that current and future Government adequately resource the actions outlined in the Strategy.

Should you require any further information regarding the NPA ACT's input, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, Convener, NPA ACT Environment Sub-committee.

Yours sincerely

Esther Gallant President

National Parks Association of the ACT

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**Environment Sub-committee** 

10 September 2020

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#### **Attachment A**

#### **Detailed Commentary**

Objective 1 - Protect the urban forest (Page 34) - Protection of the current urban tree forest is vital. Empirically there has been a constant loss of established trees within the urban environment and it is vital that measures are in place to protect existing trees on both public and private land. Urban developments must account for and seek to protect the existing trees wherever possible. The NPA ACT would support measures to improve tree friendly architectural designs and the introduction of offsets for any losses of trees.

In addition, this objective should also consider the conditions needed for maintaining healthy existing trees. Therefore, this objective should also consider mechanisms to improve water infiltration around trees and other methods to improve tree health.

Objective 2 - Grow a resilient forest (Page 36) - This objective forms a key part of this Strategy, driving the expansion of the tree canopy across Canberra. However, as identified in the Strategy it is not possible to create a uniform 30% tree canopy across the urban environment as the importance of areas such as grasslands need to be also considered. A resilient forest is also achieved through appropriate understory plantings to increase natural biodiversity that with promote good health in both native and exotic trees.

Sensitivity of plantings on other environmental objectives should also be considered for objectives such as solar access for passive solar homes, and for photo-voltaic systems.

And the choice of trees to be planted, and their ongoing care will be critical to the Strategy playing an important role in mitigating climate change.

The roadmap on page 38 is a good summary of the broad steps required for achieving the canopy target.

Objective 3 - Balance and Diversify the urban forest (Page 40) – A key statement in the Strategy is that to "meet the vision of a resilient forest our future urban forest must have a diverse range of species. Diversity is a key element of what creates a resilient urban forest". Implicit within this statement is the need to cover trees of differing heights and the introduction of shrubs and herbaceous plants to complement the tree plantings.

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Objective 4 - Take an Ecological Approach and Support Biodiversity (Page 44) -

As previously mentioned, the NPA ACT supports the use of a wide range of plantings of trees and other species as part of the Strategy and the introduction of no mow areas. The NPA ACT notes the important research into this approach that is being conducted by the Fenner School of the Australian National University

The benefits of a diverse forest are not limited to the urban environment but will also benefit the many units of Canberra Nature Park (CNP) adjoining Canberra's suburbs. Sensitive planning will enhance the connectivity between CNP's reserves that epitomise the nature on our doorstep characteristic of many of Canberra's suburbs, assisting in the maintenance of their biodiversity values.

Wherever possible the NPA ACT believes that it is better to leave safe dead trees and logs within the urban forests therefore providing more diversity and shelter for a range of organisms. Alternatively, they should be used to further rehabilitate reserves without significant wood debris or for the installation of standing dead trees such as being implemented in the new reserves in Central Molonglo.

Objective 5 - Develop Infrastructure to Support the Urban Forest and Liveability (Page 44) - While this objectives makes much mention of permeable surfaces to allow rain water penetration, and Actions 5.2.6 and 5.2.7 mention rain gardens and swales, there is a greater opportunity to create water sensitive design in all new suburbs, and retro fit older suburbs to use stormwater for urban forests. This will not only reduce stormwater problems, but will enhance tree survival in a drying climate. I note that there is considerable mention of trees on roadsides, but there no mention of the role of Transport Canberra and City Services who control these roads and the stormwater drainage from them.

Objective 6 - Partner with the Community (Page 46) – The NPA ACT welcomes the emphasis within the Strategy for community engagement. The Strategy has an ambitious target and community assistance will be essential to its success.