



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Climate Change Policy
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Submission: ACT Climate Strategy to a Zero Net Emissions Territory Discussion Paper

Thank you for the opportunity to make a submission on the *ACT Climate Strategy to A Zero Net Emissions Territory Discussion Paper* (the Paper). The National Parks Association of the ACT (“NPA ACT”) is a community-based conservation organisation with more than fifty-five years of working to protect our natural environment through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs.

The NPA ACT has a strong interest in limiting the risks posed by climate change, adapting to a warming climate, and increasing collective resilience in the ACT. Climate change threatens the important environmental values of Namadgi National Park and other parklands in the ACT, which our members regularly visit, as well as the quality of the urban environment in which we live. Therefore, we fully endorse the ACT Government’s commitment to achieve net zero emissions for the ACT by 2050 at the latest. We also applaud the government’s recognition of the urgency of reducing greenhouse gas emissions in the Territory.

The NPA ACT broadly endorses the overall direction of the Paper, including its approach of combined flexible short-term and longer-term strategic planning with regular review of progress (and the accordingly required adjustments to targets and activities), given the variability of climate change outcomes depending on local conditions. We think that the three-pronged focus on reduction, adaptation and mitigation also is very pragmatic, since climate change impacts are already being experienced in the ACT and Australia-wide.

In particular, we support:

- The minimisation of the purchase of carbon offsets if the government does not meet its emission reduction milestones, instead reinvesting in further initiatives to reduce our actual emissions as much as possible. This course of action addresses the real need to ensure abatement projects are carried out within the ACT.

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- The use of natural carbon sinks in the Territory's forests and grasslands to offset carbon emissions, which implies sound management of the ACT's national parks, nature reserves and forestry plantations; and
- Monitoring of the clearing of trees and grasslands for development, limiting deforestation, and procuring additional land for afforestation and reforestation projects in the urban environment and along river corridors, etc. We look forward to the development of a *Living Infrastructure Strategy*, including targets for shade from trees, along with community input into its planning and implementation.

At the same time, the NPA ACT feels that there is scope for further action. Firstly, urban planning processes need to be strengthened and made more transparent and accountable for their potential climate change related impacts. While land clearing for urban development is recognized as an influencing factor in ACT emissions beyond 2020, and that "a vegetated landscape loses carbon if it is cleared" (p 20), there are no specific actions identified in the discussion paper beyond a broad statement about the improved planning reducing the pressure to expand Canberra's urban footprint (and remove grassland and open woodlands). We are concerned about the ever-expanding number of suburbs that are proposed or under construction in the Territory, even in fragile areas (such as river corridors). We would recommend no further land clearing be carried out in the ACT, in order to protect our valuable carbon sinks.

Within our urban and rural, we note with the concern the loss of established trees, which are valuable carbon sinks and, often, important environmental hotspots. The NPA ACT recommends that, wherever possible, established trees should not be removed.

We further note that developments which are currently planned or underway appear to have insufficient or ineffective environmental 'checks and balances' in the approval process. The recent experience of the loss of significant trees in Coombs despite concerns by the Conservator illustrates this. We would further recommend that specific actions be identified to strengthen attention to the climate change impacts of urban planning processes, as well as community input into this process. This can also help to build ongoing community interest and contributions to urban climate adaptation and mitigation across the range of need areas identified in the discussion.

In addition, the government should legislate to strengthen existing planning requirements to ensure new urban developments always include features such as passive solar orientation of buildings; double-glazing of windows (and doors); solar water heating; changing the ratio of building to block size so that enough room remains on the block around the building to plant trees and shrubs (including incentives to buy and plant trees and shrubs). Also, in the urban environment there should always be space for street trees to mitigate the heating effect of asphalt and concrete.

We would recommend that the role of the Conservator be expanded and strengthened to include a specific requirement for considering the impact of climate change when making decisions in regards to urban developments or other actions

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that will lead to the loss of biodiversity. Legislation governing the role of the Conservator should be amended to make decisions by the Conservator mandatory as the environmental concerns of the Conservator appear to be ignored under the current planning process.

Secondly, we would recommend that the ACT Government amend its current bushfire mitigation activities to achieve an approach which focuses bushfire mitigation around the assets that are required to be protected. This approach was strongly canvassed at the 2017 ACT Community Symposium - *Bushfires: Balancing the Risks*. Such an approach will lead to a reduction in the number of prescribed burns in our national parks and an increase in protection activities closer to the ACT's suburbs to provide more effective bushfire mitigation outcome. A reduction in the number of broadscale prescription burns would reduce the amount of greenhouse gas emissions being released and would be a positive contribution to the ACT Climate Strategy while still providing effective bushfire protection

The NPA ACT encourages the ACT Government to continue to maintain its international leadership position on climate change emissions reductions. We would be pleased to discuss ways in which our members can contribute, especially with regards to the protection of our national parks and urban reforestation.

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

Yours sincerely



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8 April 2018