Tasman District Council – Long Term Plan 2024 – 2034

Submission

Nature and Climate Group, Nelson Tasman Climate Forum (NTCF) 28 April 2024

Introduction

As the Nature and Climate Group of the NTCF, we have applied a climate change and biodiversity lens to the Long Term Plan (LTP) and a number of the supporting documents, including some Activity Management Plans (AMPs).

We also refer Council relevant sections in to our concomitant and recent submissions on the:

- Climate Response Strategy and Action Plan (CRSAP);
- Parks and Reserves: Richmond Ward and Murchison Lakes Ward;
- Regional Pest Management Plan (RPMP).

Key Principles

In order for Council to effectively and equitably administer the district over the coming decade and beyond, we believe there are fundamental principles which need to be recognised. Some are self-evident and built into every Council policy and strategy, others are less widely integrated into Council thinking. All are important:

- Key requirement for prudent and wise use of financial and non-financial resources;
- Requirement to deliver appropriate Council services to ALL residents, equitably and effectively;
- Need to adapt to a rapidly changing operating environment, including changes in legislation, and advances in technology;
- Urgent need to address the climate crisis, including significantly decreasing greenhouse gas
 emissions, adapting to the impacts of climate change, and protecting the environment
 (including all indigenous biodiversity and ecosystems) within which we live.

It is this last principle that will be addressed through our feedback in this submission. We start by providing feedback on a number of associated documents, with our response to the six choices specifically requested by Council forming the second part of our submission.

Part 1: Feedback on LTP Documents

Forecasting Assumptions

In the document outlining the assumptions made in forecasting for the LTP, the assumptions relating to the impacts of climate change in the district are described (Chapter 2.1). This includes some analysis of how climate change impacts will affect communities, the built environment, the economic environment, biodiversity and the likelihood of adverse weather events.

The section concludes by noting that: "Council's business must respond to climate change now to ensure a level of preparedness for future impacts. Failure to respond will lead to significant future challenges and costs."

Given Council's recognition of the impacts of climate change across the district and the attendant costs, it is puzzling that the CRSAP currently outlines a greenhouse gas emission reduction target for

Council of 16% of 2020/21 levels by 2030. This is well below the required reduction of 43% to meet our international commitments, and to avoid the most dangerous extremes of climate change. Even with reductions of 43% or greater, there will be impacts from an increasing unstable climate over the period of the LTP.

We believe the current CRSAP target is a "failure to respond" that will cost us dearly. All entities – local and central government, businesses, industry and individuals – need to significantly reduce emissions to limit the extent to which our climate changes.

 We urge Council to respond to this challenge, to increase its CRSAP emissions reduction target to 43% and to work with the wider community to decrease emissions across the district by 43% or more by 2030.

Draft Infrastructure Strategy

Impacts of Climate Change

We applaud the recognition on page 2 of this Strategy that "Climate resilience is core to climate-resilient infrastructure and core to financial security. The costs of climate change and natural hazards on people's homes, businesses, and council assets and service delivery can be devastating. The more we can learn, understand, and plan for these events, the better positioned we will be to build community resilience and cope with them."

The Strategy analyses the potential risks and costs of climate change to the community, including infrastructure (pages 14-16) and the measures taken to manage those risks (page 30). One measure proposed is to shift the Motueka Wastewater Treatment Plant inland, to a site less at risk from the impacts of climate change, which is sensible – we encourage Council to make this shift.

Given the acknowledgement of climate-related risks throughout the Draft Infrastructure Strategy, why is there a map on page 19 of the <u>Draft Growth Projections</u> that indicates growth of new businesses in Richmond along the edge of Waimeha Estuary???

 We urge Council to resist the temptation to build any more infrastructure, or allow any development, in areas at risk of sea-level rise, flooding or land instability as a result of climate change.

Developments completed within the last decade have already occurred in places that are unsuitable for infrastructure due to climate change risks, despite these risks already being known. This is foolishness and will end up costing property owners in the long term. Development and infrastructure need to be located in areas where risks are low.

Stormwater

As climate instability increases, the district is likely to face more frequent high intensity rainfalls events. It is these high intensity events that test the capacity of stormwater systems, with system failures potentially causing catastrophic flooding and damage.

• We urge Council to work with developers, and others, to increase surface permeability and decrease hard surfaces in areas under development to mitigate increases in stormwater run-off.

By increasing the extent of permeable surfaces through replacing pavement/concrete wherever possible, pressure on stormwater infrastructure during high intensity rainfall events will be lessened. In addition, there are fewer carbon emissions associated with natural surfaces than with concrete.

One option could be to mandate a minimum area that must be permeable, such as through use of natural materials (e.g., gravel) for pathways in a proportion of a new subdivision or commercial development. Another option is to mandate rainwater collection tanks to limit stormwater volumes and to store water for use in gardens, crops, or outdoor cleaning, during drier periods.

- We urge Council to mandate the implementation of Water Sensitive Urban Design (WSUD)
 principles wherever and whenever possible, in both Council infrastructure work and in
 development undertaken by commercial interests;
- For example, in Table 15 (page 61) of the Strategy, Council needs to mandate the use of onsite detention capacity.

Council also needs to ensure that the Annual Exceedance Probability (AEP) metrics used in stormwater planning reflect the likelihood of increased high intensity rainfall events as a consequence of climate change (page 62).

Transportation

We applaud and support all efforts to increase the use of public and active transport options (pages 72-73). We will expand on this below.

Rivers

In terms of flood mitigation (pages 80-82), we urge Council to ensure there is no new development of infrastructure (housing, commercial etc) in areas currently known to be flood-prone or on flood plains, and in areas that likely to be flood-prone under realistic climate change scenarios.

Draft Rivers AMP

The waterways that connect our mountains to the sea are vitally important landscape components that not only connect ecosystems from uplands to lowlands, but also connect horizontally across the landscape through river channels and floodplains. There are also important connections vertically, with the movement of water from the above-ground channel through the hyporheic zone into groundwater and aquifer systems.

Waterways are conduits for water, materials, energy and biota, and play a critical role in maintaining ecosystem health throughout the district.

Healthy waterways provide habitat for a wide range of biota, both terrestrial and aquatic. In turn, healthy biota promotes waterway health by reducing sedimentation and erosion, trapping pollutants, maintaining water quality, maintaining water temperatures through shading, attenuating high flow events and low flows during droughts.

In managing the rivers through flow through the district, Council's first priority is "to protect properties from flooding by implementing and maintaining river control works and flood protection assets", with river health a secondary consideration (1.2 Activity Goal, page 4).

• We urge Council to prioritise river health.

Without healthy waterways we cannot support healthy biodiversity, healthy ecosystems or healthy productive landscapes. Indeed, healthy productive landscapes rely on the deposition of sediment and nutrients that occur in periodic flood events to maintain soil health and hence productivity.

We appreciate that much of the district's existing infrastructure has been constructed on floodplains, as it common in a country where floodplains provide the only significant areas of flat land. This is an unavoidable reality of living in New Zealand.

 We urge Council to prevent further inappropriate development on flood-prone land, and to make those decisions using realistic climate scenarios to determine the probabilities of increased flood events (extent, frequency and severity).

Council also needs to be upfront in communicating flood risks to residents and industry, as it is not possible to flood-proof all infrastructure throughout the district, as noted in the AMP.

We appreciate that land use change has resulted in rivers that are classified as either X or Y (Table 2, pages 11-12) ranging from being relatively intact to highly modified, particularly in their lowland reaches. We encourage Council to facilitate riparian planting in as great an extent of these rivers as is feasible, using native species.

However, with rivers classified as Z, which encompasses the multitude of smaller waterways criss-crossing the district, there is the potential to enable these waterways to run freely and unconstrained across the landscape, occupying the full extent of their floodplains. Allowing these rivers to take their natural course through the landscape will mitigate flood risks and help maintain waterway and ecosystem health.

- We urge Council to work with land-owners to ensure rivers classified as Z to run freely across the landscape, including across their entire floodplains, without impediments or barriers;
- We urge Council to prevent any further infrastructure or development implementation along the channels and in the floodplains of class Z rivers, including agriculture or horticulture development on floodplains that constrains dynamic river flow.

Allowing rivers to be dynamic with ever-changing channels and floodplains is a key to maintaining their health. We ask that Council seeks the removal of any barriers to their natural flow and movement across the landscape.

By restoring the natural hydrology of these waterways, we will reap the benefits of healthier waterways including increased water quality and more natural flow regimes, healthier terrestrial ecosystems, healthier coastal, estuarine and marine ecosystems, decreased flood damage and increased flood resilience, increased biodiversity, increased climate resilience, and increased cultural and aesthetic values.

- We urge Council to work with land-holders to plant riparian buffer zones of appropriate widths with native species to restore these waterways to full health;
- In all situations, we urge Council to choose native species over exotic species, particularly willows as they have numerous detrimental impacts on waterway functioning and health.

Draft Parks and Facilities AMP

We refer Council to our recent submission on the Parks and Reserves: Richmond Ward and Murchison Lakes Ward, and the overarching principles and key points for management of all Council's Parks and Reserves contained therein.

We highlight the key principles again here:

- Manage all parks and reserves to enhance the resilience of native ecosystems and biodiversity in a changing climate;
- Wherever possible, plant native species rather than exotic species;
- Engage with iwi, neighbouring landowners and local communities to encourage stewardship of parks and reserves, and to educate the community about native ecosystems and biodiversity.

In addition, we highlight the following points in the AMP for Council to address, which focus on our areas of key concern – the climate and biodiversity crises.

Key issues that are missing from the AMP include:

- Climate change adaptation in face of sea level rise/land subsidence in coastal areas;
- Climate change **mitigation** and the need to significantly reduce carbon emissions of facilities (e.g. Richmond Aquatic Centre);
- The need to upgrade Council-owned housing stock for energy efficiency and reduced carbon emissions (through improved insulation, solar panels etc) – there is an opportunity to make them examples for other rental housing providers;
- The need to enhance connectivity of parks and reserves through strategic purchases of land where this is feasible, including connections with cycle paths/trails, to improve biodiversity outcomes:
- The need to ensure that plantings in parks and reserves prioritise native species and edibles in lieu of exotic trees and ornamentals.

Section 1.5.3.2: Reducing Parks and Reserves Maintenance Funding

- Consider the option to reduce areas planted with annual species and replace them perennial species that require little maintenance;
- Consider the option to reduce/replace non-recreational grassed areas with native shrubs and ground cover species to eliminate mowing (decreasing both costs and carbon emissions) and aid ecological restoration.

Section 1.5.5 Managing the Risks

Climate change impacts are included as risks, but there is no mention of their management, mitigation, or how these risks have influenced (or not) the proposed activities/spend of Council.

In Table 17 (page 38) mitigation of climate change is mentioned, but only as regards adaptation (evacuation plans, coastal retreat) and not mitigation (reducing emissions from key facilities).

The logistical and financial impacts of coastal retreat are not detailed, e.g.:

- Relocation of multiple sections of the Great Taste Trail this involves land purchase costs, agreement with new landowners and the cost of trail construction;
- Richmond Aquatic Centre located in the area with the greatest land subsidence rate in the
 district, combined with sea level rise, will make it likely vulnerable to storm surges within this
 LTP period;

• Implications for natural environment in coastal parks and reserves – inland retreat of salt marshes and estuarine ecosystems to land currently in pasture or in the built environment (residential, commercial/industrial) and the concomitant need for land purchase and remediation and/or restoration work as reserve areas move inland.

Section 1.5.6. Assumptions

A key assumption is missing from Figure 4 is that there will be more climate change related events (floods, landslips, coastal erosion, storm surges, wildfires, droughts) during the LTP period, with the attendant costs and disruptions.

This reality is highlighted in Table 18 (page 43), but the underpinning data is outdated (NIWA 2017). The latest IPCC report (AR6) indicates faster sea level rise and temperature increases than were expected in previous reports, including in the Australasian region. It is thus vital to plan for major adverse events, of increasing severity over time, across all facilities, parks and especially coastal assets. This is relevant to Section 9.1 on climate change too – the risks and costs are underestimated. For example, will asset insurance costs exceed current provisions as climate change impacts accelerate?

- We urge Council in its work to "mitigate emissions, work with the community and show leadership" (Table 18), to do all of these things with greater urgency and commitment, as per our submission on CRSAP;
- We also urge Council to consider the full breadth of climate risks to parks and facilities, not
 just sea level rise. Floods, droughts, storm events and wild fires all have the potential to
 damage and destroy parks, facilities, heritage trees etc.

Section 7.1.11 Condition of Parks and Reserves

This section focuses on fixed assets and not on the natural environment, except for ornamental gardens and trees. There should be a section on enhancing native plants/ecologies within parks and reserves, as a means to improve biodiversity (including in urban environments). By replacing annual species with native, drought-tolerant perennial species, and replacing lawns with native ground cover species where feasible to decrease mowing requirements, Council could reduce costs, irrigation needs, and carbon emissions. This would alleviate some of the cost pressures outlined in Section 7.2.

Section 7.4.3 Forecast New Capital Expenditure

There is no provision in this section for land purchases and other costs associated with the managed retreat of coastal reserves (see feedback on Section 1.5.5 above). Nor is budget forecast for the repair and/or replacement of assets affected by adverse weather events as a result of climate change, such as storms, droughts, and fires.

Section 7.5.3. Disposal of Building Elements

As with all waste management, the carbon emissions of different options should be considered when making the decision to dispose of building elements.

Section 9.1 Climate Change

Embedding climate change into core business across Council may well be an important focus, but very little evidence of this is provided in this AMP.

Section 9.1.1.1 is extremely short, weak and not particularly helpful. The lack of thought and detail in this section is remarkable when contrasted the great specificity of most other sections of this AMP.

We are also puzzled by the assertion that Council is pursuing emissions reduction targets in line with government targets, given the targets outlined in CRSAP (Outcome 1c).

- We urge Council to identify specific actions that will achieve emissions reductions in the management of parks and facilities, by both Council and contractors (e.g., installation of solar panels on facilities, use of electric tools instead of those powered by fossil fuels);
- We urge Council to quantify the carbon sequestration potential of parks, and to identify
 opportunities to increase sequestration, for example by allowing inland migration of salt
 marsh ecosystems and by revegetating lawn areas in parks with woody native species.

As noted earlier, we are concerned that the regional risk assessment being conducted with Nelson City Council is based on outdated NIWA reports that significantly underestimate the impacts and risks of climate change (Section 9.1.1.2. Climate Change Adaptation). This flows through to risk assessments for parks, reserves and facilities, and the need to plan and build for resilience at pace, and needs to be addressed.

Appendix C Key Council Bylaws, Policies, Plans and Strategies

The Tasman Biodiversity Strategy is missing here, as is the Tasman Climate Response Strategy and Action Plan. Both are critical documents that should be underpinning the management of the district's parks, reserves and facilities and we ask that they be included in this appendix.

Draft Environmental Management AMP

The focus in Table 1 (page 5) on the sustainable management of resources is at odds with the world view that we are "of the environment" and "in the environment", rather than merely managers of the environment as something external to ourselves. The reality is that we cannot exist outside of the environment. All components of that environment – physical, chemical, biological – are critical to ensuring that the environment is healthy. We cannot survive if our environment is not healthy. Healthy ecosystems across land and water are essential to healthy, flourishing human communities. Our role is custodians of the environment, a subtly different role than that of managers.

We suggest a more appropriate opening sentence might be to ... "promote all aspects of environmental health, by..."

The risks associated with climate change outlined in Table 3 (page 7) do not include those of increasing minimum and maximum temperatures over the long term. These increases are likely to have considerable impacts on native biodiversity on both land and in the ocean, and will affect biosecurity risks as well. Ocean acidification is also not mentioned, despite its potential impact on our marine biodiversity.

Table 6 Levels of Service and Performance Measures (page 24)

Air Quality

Currently TDC measures PM_{10} , according to national standards. However, WHO guidelines (2021) include monitoring of $PM_{2.5}$ as well, as these smaller particles penetrate into the lungs and can cause serious health issues. WHO (2021) has quantified both daily and annual average limits:

PM₁₀ Annual average of 15 μ g/m³ PM_{2.5} Annual average of 5 μ g/m³

PM_{2.5} Daily average should not exceed 15 μg/m³ more than 4 days per year

We urge Council to upgrade current air quality monitoring to include PM_{2.5} as well as PM₁₀, with the appropriate equipment and related costs included in the budget.

We note that PM_{2.5} emissions from vehicles are a major issue in urban centres. Monitoring of air quality at congested road transport locations (e.g., in Richmond) would allow vehicle pollution to be taken into account in decisions relating to transport infrastructure and policy development in Tasman.

Pest Management

The performance measure in Table 6 is simply the presentation of an annual report, but this has no bearing on the outcomes of the Council's pest management strategy/operations. The report may conclude that pests are rapidly spreading through the region, and the level of service will be deemed compliant. This is not an acceptable performance indicator.

We request that Council craft a performance indicator that directly relates to the outcomes
of the strategy and its operations on pest populations.

Dairy Monitoring

As for pest management, the performance measure in Table 6 is simply the presentation of an annual report describing compliance with obligations relating to effluent discharge.

 We urge Council to craft a performance indicator that directly relates to whether or not dairy discharges are compliant, and if non-compliance is an issue, what steps are being taken to ensure compliance.

Section 9 Climate Change, Natural Hazards and Environment

We refer the reader to our feedback above, under the Parks and Facilities AMP, as this section appears to be extremely similar in both AMPs, although even briefer in the Draft Environmental Management AMP, somewhat surprisingly.

Section 9.1.1.1 Mitigation

• Council must reduce emissions to 43% below 2020/21 levels by 2030 (a reduction of at least 7% each year until 2030), and 65% by 2035.

Section 9.1.1.2 Adaptation

This section provides no evidence of how Council intends to adapt to the changes climate change will bring to the environment of Tasman. There is no evidence of a plan for changing management of biosecurity operations as pest species ranges change with increasing temperatures, for example. There is no evidence of a plan to assess changes in biodiversity health, ecosystem health, waterway health, any environmental health metrics as our climate changes. Without a plan, it is hard to see how Council will manage those changes.

• We urge Council to develop effective plans to assess and manage the impacts of climate change on Tasman's environment, from the mountains to the sea.

As above, we ask that Council ensures that any risk assessments are based on the most up-to-date information and data. Without this, assessments will under-estimate risk and give Council, businesses and the broader community a deceptively false sense of security.

We note that resource consent applications and compliance are covered by this AMP. We remind Council that as climate changes and attendant risks increase, insurance costs will rise – indeed, they are already rising. It is highly likely that, within this planning period, many properties will become uninsurable, or face premiums so high that under-insurance becomes the norm. This will include Council-owned assets. Insurance companies are increasingly using climate data to estimate climate risks and adjust (upwards) premiums and even to withdraw from the market in some locations. It is vital that Council deploys a similar quality of granular and current data to derive its own plans and policies. If insurance companies manage risk better than Councils, then increases in premiums and/or market withdrawal may be used as a proxy for risk, for locations where managed retreat and asset relocation is required. Budgeting for much higher insurance premiums also needs to be built into the LTP.

Part 2: Response to Specific Questions

On page 7 of "Investing in Our Future: Tasman's 10 Year Plan", there is an infographic outlining the timeline for a range of projects and initiatives, starting at the top of the page with those due to commence in 2024 and winding down to those with later start dates. Some projects span the entire decade.

We are alarmed to see that sitting next to 2034 at the bottom of the page is "A programme of work that contributes to climate change adaptation and mitigation." As if this programme of work is relegated to some time period, 10 years hence. This may not be what is intended, but that is the message that is conveyed.

Is this really what Council is communicating to the community? That yes, we believe climate change is an issue but we can kick the can down the road for another decade? We know, and Council knows, we can do no such thing. We respectfully ask that you redraw the infographic if ever used again and place climate change adaptation and mitigation as the highest and most urgent priority, not tack it on as an after-thought at the end. Perceptions matter. Ensuring the community understands our reality is paramount.

Choice 1: Financial Stability

Option A: Continue to deliver the current levels of service, respond to climate change, and invest in community facilities

We support Council in Option A, and emphasise the need to invest in activities and programmes that mitigate greenhouse gas emissions, adapt to climate risks, and enhance native biodiversity and the health of native ecosystems.

We continue to urge Council to assess the funding of all projects and activities through a climate change-lens, ensuring that decisions are made that support a healthy climate, rather than locking in further climate instability. Every funding decision needs to be assessed against climate criteria:

- Will this decision increase or decrease our carbon footprint?
- Will this decision increase or decrease our climate resilience?

This includes prioritising urban intensification over greenfield development, prioritising energy efficiency and the use of active and public transport options, preventing development in areas likely

to be impacted by sea level rise and other climate-related risks, investing in renewable energy generation directly or indirectly, etc.

We are particularly concerned that if Council selects Option B, that the decreased funding for Parks and Reserves will have significant detrimental impacts on climate resilience, native biodiversity and ecosystems, and on community health and well-being.

Choice 2: Transport

Choice 2.1 Sealed Road Maintenance

Option A: Invest to maintain sealed road condition

We support Council in Option A, with the caveat that Council advocates for more funding from the National Land Transport Fund for road maintenance and renewals that are primarily caused by heavy traffic, yet are paid for 49% by Council – effectively by ratepayers. Heavy trucks cause a vast majority of road damage and do not pay their fair-share of road maintenance.

Choice 2.2 Public Transport

Option B: Increased frequency of services BUT MORE URGENTLY

We support Council in Option B, but urge Council (and NCC) to expand the bus services much more rapidly that proposed. We urge both Councils to roll out weekend services to Wakefield and Motueka and increased bus frequency between Richmond and Nelson in peak hours in **2025**.

We need a paradigm shift in our transportation mindset as a community. We need people to be getting out of their fossil fueled cars and into electric buses to significantly reduce our greenhouse gas emissions, reduce congestion, reduce air pollution, reduce stress and reduce our climate risks. Putting off behaviour change until 2029 is not an option.

It may even turn out that investing more heavily in public transport will decrease the need to invest in roads and road maintenance as traffic decreases, saving Council money.

Choice 2.3 Safety for Pedestrians and Cyclists

Option B: Enhanced investment in improvements to safety for pedestrians and cyclists

We support Council in Option B, but urge Council to go further to increase investment in safe and accessible walking and cycling pathways across the district. We need to encourage the community to use active transport options to significantly reduce our greenhouse gas emissions, reduce congestion, reduce air pollution, reduce stress and reduce our climate risks.

We need to change the mindset of car first, to walk/bike/bus first. We need to make it easy to choose active transport over car transport.

We note that as they currently stand, Options A + B increase Council debt by \$7.2 m. While this may be of concern to some rate-payers, it is worth noting that in 2023, NZTA increased the capital value it places on a human life in its costings to \$12.5 m. If Council upgrades to the active transport network save one life, the investment will have paid off.

Choice 3: Climate Change and Resilience

Option B: Higher level of investment BUT GREATER INVESTMENT

We support Council in Option B, but urge Council to do more, go further, be braver, invest more. We refer Council to our separate submission on the CRSAP, and submissions from the NTCF on both CRSAP and the LTP, for further details of our expectations of Council to address the climate crisis.

We also wish to note that there is potential for confusion in the 10 Year Plan Consultation Document, with the impression given that Choices 1-4 and the Options therein, are costed independently of one another, and are to be assessed and analysed by the community as independent entities.

Following consultation with Council, we have discovered that this is not the case. The list of climate mitigation actions in Choice 3 (page 20) includes two options included in Choices 2.2 and 2.3:

- Expanding regional eBus services to weekends (\$26.2 m);
- Modest investment in safety improvements for pedestrians and cyclists (\$15.7 m).

The \$42 m associated with these activities is included in documentation in Choices 2.2 and 2.3 and AGAIN in the \$63 m listed under climate mitigation actions on page 20. However, the community is not being asked to pay for these actions twice.

Given that consultation on these two actions is separated out from consultation on climate change and resilience as a whole, we would have preferred Council to leave these two items off the list of climate mitigation actions. We acknowledge that investing in public and active transport is vital to our climate response, but would prefer that the list of actions includes only those actions not costed elsewhere.

Given the impact of these two items on the budget for climate mitigation, it is apparent that Council is only budgeting \$27.2 m over ten years for the 11 remaining adaptation and mitigation actions on their list, and any others that require investment over the decade. At \$272,000 pa, we believe this is a woefully inadequate budget for the greatest risk faced by Council and the community and urge Council to significantly increase it.

Choice 4: Investing in Community Facilities

Option A: Invest in new and improved community facilities

We support Council in Option A as we believe that developing and maintaining facilities such as these is core Council business and because building communities at place is an important way to reduce emissions of greenhouse gases from transportation.

However, we do urge Council to ensure that any new facilities are fit-for-purpose in a rapidly changing climate, and built to the highest standards of insulation, energy efficiency and water use efficiency. We advocate for new and refurbished builds to include solar energy generation potential, rainwater capture options and water recycling. The location of all new builds must take into account long term climate risks such as flooding and sea level rise, with locating of the Motueka Swimming Pool particularly important in terms of sea level rise. It would be prudent to build this facility in a site that is well protected from the most extreme predictions of sea level rise, to ensure its long term survival.

Submission collated by Group Convenor: Dr Fiona Ede