



12th December, 2024.

Schedule 17.4A: **Sea level trigger**. We highly commend TDC planning staff for proposing this amendment. We hope this example will be followed throughout the country. It is aligned with the National Adaptation Plan (2022) which requires councils to consider climate change scenarios in order to reduce vulnerability and enhance adaptive capacity. This foresight in reducing climate risk exposure is also a step in implementing the Tasman Climate Response and Resilience Strategy and Action Plan (2022-2035).

The Sea Level Trigger is carefully defined and includes vertical land movement. However we have concerns about the additional strains on stormwater provisions under inundation.

Given the large number of piped and overland streams in the Lower Queen and McShane Road areas, we are concerned that the capacity of storm-water systems to drain in extreme weather will become increasingly problematic. Combined with the known impacts of rising water tables in coastal areas as a result of sea level rise, the risk of severe flooding in these areas is likely to rapidly increase over time. This issue needs to be taken into account in the proposed trigger mechanism.

It is important that the stormwater on these new industrial sites is properly treated on site before discharge, according to the Nelson-Tasman Land Development Manual. Contamination issues have arisen from the low-lying industrial properties on Beach Road eg timber treatment site, auto wreckers, coal storage, concrete manufacture, and it is important that new industrial activities are future-proofed.

Policy 6.5.3.10 amendment: **That industrial buildings are relocatable** in circumstances related to the Sea Level Trigger. This is obviously prudent, and will limit risks and costs to private owners as well as public risks and costs in the face of expected inundation risks of greater frequency and magnitude.

Council consents need to ensure that no toxic materials are stored on sites in the designated areas. The risks of seepage and long-term contamination are very high on such vulnerable sites because of the types of porous sandy soil there, the high water table and risks from storm surge and sea level rise contamination. Council therefore needs to specify the types of businesses that can use this land-ie businesses which do not use toxic materials or other potentials for seepage contamination.

We suggest more specificity is provided in such circumstances about the time for relocation and dealing with residues and wastes.

Policies 6.8.3.11 and 13.1.3.7A We support the recognition of **retreat** as a necessary response to sea level rise and inundation risk. This is a difficult phenomenon to incorporate into planning, for financial

and emotional reasons, but climate science informs us of its utter inevitability. Early recognition and planning for it will lessen eventual costs. The planning staff is to be commended for this.

Policy 16.3 Subdivision. We strongly support limitation or prevention of subdivision on properties at risk of inundation, such as the land in Lower Queen St., Richmond. Subdivision will increase risk exposure with more buildings and equipment and more public health risks with increased possibility of use of toxic materials which become widely spread in inundation. It increases difficulties of implementation of adaptive response with more stakeholders owning more infrastructure.

Applying these policies to Richmond West properties RW1 and RW2, we support Assessment B Option A. This prevents the risk inherent in subdivision, allows best use of the land up to the Sea Level trigger point, then allows some flexibility about exit from the land thereafter.

Further comments.

We note that currently there is no consideration in the plan for contingency planning in the specified locations for further major extreme weather events and consequent major flooding of those areas and hazard risks *before* the trigger is activated by sea-level rise. Contingency planning for flooding caused by extreme weather events effecting the Lower Queen and Patons Rocks areas before the trigger is activated by sea level rise, needs to be part of this plan.

References

<https://www.sciencedirect.com/science/article/abs/pii/S0022169422011246#:~:text=In%20coastal%20watersheds%2C%20SLR%20has,of%20SLR%20on%20coastal%20flooding.>