

Statement of evidence

My name is Hans Stoffregen and together with my family, own the properties located at 23 and 25 Lansdowne St, Clifton. I am one of the affected parties of RM 190876.

I am a Senior Ranger, Biodiversity and have been working for the Department of Conservation Office in Takaka since 1997. I completed a Masters degree in Conservation Science at Victoria University Wellington in 1994.

I take my submission to TDC dated 4th February 2020 as read.

I wish to make additional points

General

1. I recognise Council's responsibility to provide flood mitigation that protects property within the Ellis Bartlett and Clifton floodplains
2. I do not oppose any of the proposed river work as long as it does not pre-empt any future wetland restoration in this floodplain.
3. For this reason I am **strongly opposed** to the construction of the proposed timber wall starting at 14B Kohikiko Place and bunding of the true right bank of Bartlett Creek. This wall should be constructed behind the dwellings of 762- 734 Abel Tasman Drive to protect these from floodwater incursion. Building that structure as proposed will destroy another dune-slack wetland in this catchment.
4. As there are only ca 6% of wetland left in Golden Bay (and this includes the large Mangarakau wetland) there is no means of mitigation. This type of ecosystem is just too rare now in Golden Bay and even more so in the Tasman District
5. Any further development or subdivision at this location should be prevented and potential wetland restoration negotiated with the landowner, Richmond Holdings. This low-lying degraded wetland should be claimed as Reserve Contribution when there are future development proposals on this title. Richmond Holdings are currently developing the designated Special Housing Area, Golden Bay's most significant subdivision on this title.

6. Any low-lying wet area should be claimed as Reserve Contribution where there are future development proposals. Council should be pro-active in approaching owners of these marginal lands and offer them development opportunities with the aim to create recreational reserves that can be used as functioning flood plains.

7. As the Ellis Bartlett and Clifton Creek catchment is a fast-developing area that provides no public spaces for conservation and recreation it urgently needs a landscaping plan that addresses all social economic and ecological pressures.

Specific to the wider application

1. The applicant is TDC's Engineering Department. The application needs to align with all national and TDC policies and strategies relevant to this application.

These are:

National Policy Statement (gives effect to MfE's Te Mana o te Wai Strategy)

- stop further degradation of our fresh-water.
- start making immediate improvements so water quality improves within five years.
- **reverse past damage to bring our waterways and ecosystems to a healthy state within a generation.**

National Environmental Standards

NZ Coastal Policy Statement

- stormwater will ultimately enter the sea affecting coastal water quality
- Stormwater ability to discharge will be affected by sea level rise. Sea level rise has not been addressed in this application, however, the impacts are likely to compromise desired flood mitigation outcomes

Kotahitanga o te Taiao strategy

- enable system and behaviour changes in order to achieve landscape scale conservation benefits.
- A scorecard exercise for Kotahitanga has identified alluvial plains wetlands and the coastal environment as the most vulnerable ecosystems in Tasman District. These systems require the greatest restorative effort.

NZ Biodiversity Strategy Te Mana o te Taiao (ie page 20 wetlands)

Tasman Biodiversity Strategy (due end of 21)

Landscapes and Coastal Environment Project which currently includes the low parts of the Clifton to Pohara area

The objectives of these strategies and policies need to be addressed in this application.

Council has to be leading these transformational changes.

All TDC engineering work needs to be evaluated in this new context.

As this application is concerned with water and its quality Manawhenua ki Mohua iwi need to be actively involved .

Qu.1. How did the applicants involve Manawhenua ki Mohua?

In response to

Damien Velluppillai Evidence: In 9.1 re to Rosemary Jones and Daniel Te Tau:

For more extreme flooding events the proposed work will not mitigate impacts as catchment flows will be far in excess of the capacity of the main drainage channels.

Damien Velluppillai Evidence: In 9.3 re to Stoffregen: states that my submission proposes the status quo, the floodwaters are allowed to disperse into the floodplain in an uncontrolled manner.

I am proposing a different landscape of meandering streams that can carry larger volumes of water at a reduced speed.

The aim has to be decreased speed of water, a larger area for storm water dispersal and reduced amount of sediments into the sea.

The farmland, which really is the wider dune slack floodplain (as described in **Selena Conns** evidence) is currently not fully utilised for sequestering stormwater during floods. Council failed in the past nine years to remove large piles of fill that was “cleared from those drains” and that currently displaces water. Drains (ie Ellis, Bartlett and Clifton Creeks) are still straight, and confluences in formed at almost right angles.

Respective landowners should be consulted and agreements (via compensation or by offering development opportunities in exchange of Esplanade Reserves) negotiated. Much could have been achieved in nine years with the funds that have been already spent on this project.

Summary:

The objectives of this application are too narrow, and solution focused without considering predicted future scenarios such as:

- Coastal sedimentation
- Sea level rise
- Future development for housing (including impact of SHA)
- Need for public and recreational space
- Forestry impacts in the top of the catchment
- Erosion along the coastline

Specific to our properties

1. The applicants do not mention the newly established Esplanade Strip and how the proposed activity aligns with its easement instrument. **This Esplanade Strip was established to contribute to the protection of the conservation values of Ellis Creek.** How does the proposed work align with this objective?
2. The applicants did not consider in their models the proposed opening of the old Ellis Creek channel on this Esplanade Strip, which would utilise that dune slack area for dispersing stormwater during a significant flood event.
3. There is currently no landscaping plan for the proposed work.
4. Future access agreement for maintenance must reflect the conservation objectives of this Esplanade Strip.