

APPENDIX 2 – Concise statement of views

Organisation	Summary of feedback
Christchurch City Council	<p>If the site is appropriate for use as a school, there are good reasons to expedite the process to provide for that school in the District Plan, and that the proposal to use section 71 will accord with the purposes of the GCR Act by supporting regeneration and urban renewal.</p> <p>This should not come at the expense of meaningful community engagement or result in any less than thorough consideration of the relevant policies and assessment of adverse effects.</p>
	<p>Supportive of the additional community engagement process that the Ministry of Education is developing in conjunction with the Board of Trustees to obtain the public’s input on designs for the new school.</p>
	<p>While accepting that the Minister’s decision under section 71 is not constrained by the provisions of the Resource Management Act (RMA), nor the objectives and policies in related planning documents, the Council considers that these provisions ought to be given considerable weight by the Minister when assessing whether to provide for the use of the Redcliffs Park site for a school.</p>
	<p>Consideration should be given to amending the zoning of the proposed school site to the Specific Purpose School Zone rather than leaving it as the Open Space Community Parks Zone, noting this could be the alternative (default) zoning for the land.</p>
	<p>The flooding issues associated with the use of the lower part of the proposed school site have been understated. Much of the lower part of the site is within a High Hazard Area as defined in the CRPS, and is within the High Flood Hazard Management Area in the District Plan.</p> <p>Both the Regional Policy Statement and the District Plan seek to avoid new development in such areas of high flood hazard, and the proposal should address why it is being proposed in such an area. The proposal should also address the implications of the flood hazard and proposed mitigation measures.</p>
	<p>Noted that the majority of the proposed school site is lower than the surrounding residential areas, and forms an informal stormwater detention basin which partially protects those surrounding residential areas from flooding.</p>

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	<p>Council does not support any filling of the lower portion of the site without equivalent volumes of compensatory storage in the vicinity.</p> <p>There needs to be early and specific consideration in the Proposal and in subsequent building, site and access design to access to and from the school buildings during flood events.</p>
	<p>Council's geotechnical review identified that there is potential rockfall hazard arising from the rock island at 1 Main Road, which extends into the proposed school site by approximately 2m. There should be no building in this area and access should be prevented. Detailed site-specific modelling and an Annual Individual Fatality Risk (AIFR) assessment should be undertaken for 1 Main Road.</p>
	<p>Council commissioned a review of the residual rockfall risk at the current school site if the site is to be used for a park. That review considers that the site is suitable for the proposed recreational use without requiring a bund to be built. Council considers that this matter should be addressed in the Proposal in the context of the suitability of the site as a park.</p>
	<p>Council seeks additional information in the proposal to address transport effects on Main Road and the intersection of Beachville, Main and McCormacks Bay Roads, including a copy of the model used to inform the assessment undertaken to date.</p> <p>Council proposed two additional conditions be included on the designation relating to the requirement for a Road Safety Audit to be undertaken and implemented prior to the opening of the school; and that specific physical works are undertaken to Celia Street.</p> <p>Council considers that the costs of all road and pedestrian safety improvements resulting from the proposed use of the site as a school should be met by the Ministry, other than contributions by Council already identified in the Long Term Plan (LTP).</p>
	<p>The Council set out a series of considerations that should be had regard to in relation to urban design, but did not seek any specific amendments to the proposal or any specific conditions.</p>
	<p>Council proposed that a designation condition is included which requires compliance with District Plan standards relating to glare in order to manage potential effects on adjoining properties.</p>

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	<p data-bbox="507 197 1406 465">Council seeks that the condition on the designation that relates to acoustic fencing should be amended such that acoustic fencing is required along specific boundaries, in addition to specifying the design and materials of this fencing. Council also seeks that a noise limit applies to the night-time operation of any external plant or equipment.</p> <p data-bbox="507 510 1406 645">Demolition of buildings on the current school site should not proceed until confirmation that a new school will be built on the Redcliffs Park site.</p>
<p data-bbox="264 685 475 808">Department of Prime Minister and Cabinet</p>	<p data-bbox="507 685 1406 775">The Draft Proposal provides most of the information required under section 65(2) of the GCR Act</p> <p data-bbox="507 808 1406 954">Further explanation as to how the proposal meets the 'preferable' aspect of the 'necessary and preferable' test in section 65(2)(d) of the GRC Act</p> <p data-bbox="507 987 1406 1155">The proposal needs to address the High Flood Hazard overlay and clearly explain how this is being managed as investment in significant new infrastructure and development, and vulnerable activities are being proposed at the site.</p>
<p data-bbox="264 1205 480 1283">Canterbury Regional Council</p>	<p data-bbox="507 1205 1406 1384">Based on the information provided in the draft proposal, CRC considers that the proposed development is inconsistent with Policy 11.3.1 of the Canterbury Regional Policy Statement (CRPS), which relates to high hazard areas.</p> <p data-bbox="507 1406 1406 1541">Once the building footprint and design are determined, CRC considers that further assessment will be required to determine whether an exception to Policy 11.3.1 applies.</p> <p data-bbox="507 1563 1406 1888">If an exception to this Policy does not apply, CRC considers that development should be avoided in the High Flood Hazard Management area in the District Plan, and the Assessed Inundation Area shown in Figure 4 of the Coastal Hazard Assessment prepared by Tonkin and Taylor. To formalise this, CRC would expect an additional designation condition that limits buildings to the elevated land on the western side of the site.</p> <p data-bbox="507 1921 1406 2056">CRC is satisfied with the conclusions in the 'Redcliffs Park: Ground Contamination Investigation' that there is no evidence of waste disposal at the site or of residual persistent pesticide contamination.</p>

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	CRC notes that CCC is responsible for ensuring the provisions of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) are complied with.
	CRC is supportive of the promotion of active modes and public transport for school travel and the aim to reduce private vehicle dependence. CRC supports the proposed designation condition for the development of a Travel Plan prior to the opening of the school.
Te Rūnanga o Ngāi Tahu	Te Rūnanga o Ngāi Tahu sought that the draft proposal confirm that the Right of First Refusal by Te Rūnanga o Ngāi Tahu remains in place on both sites.
	Te Rūnanga o Ngāi Tahu considers that the draft proposal should articulate the opportunity to advanced improved community use i.e. a health hub at the current school site.
Selwyn District Council	Confirmed that it has no views on the proposal
Waimakiriri District Council	Confirmed that it has no views on the proposal