

REDCLIFFS SCHOOL SECTION 71 PROPOSAL

Summary and analysis of submissions

April 2018



**DEPARTMENT OF THE
PRIME MINISTER AND CABINET**
TE TARI O TE PIRIMIA ME TE KOMITI MATUA

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Background

On 1 November 2016, the Minister of Education made the decision that Redcliffs School would relocate to the nearby Redcliffs Park and the former school site would become a park.

In 2017, under section 65 of the Greater Christchurch Regeneration Act 2016, Regenerate Christchurch (acting on behalf of the Ministry of Education) drafted a Proposal to make the necessary Christchurch District Plan amendments to expedite designation and land use-zoning changes required.

The Minister for Greater Christchurch Regeneration invited public written comments in accordance with section 68 (c) of the Greater Christchurch Regeneration Act 2016 Act (invitation published on the DPMC website, in the Gazette on 9 March 2018 and The Press on 10 March).

The Proposal was available online (DPMC website) and hard copies made available for inspection at: Christchurch City Council service centres and libraries, and the main office of Selwyn and Waimakariri District Councils.

Anyone could make a written comment by 5pm, Tuesday 3 April 2018. A few written comments were received from the public outside this deadline and these were accepted.

Methodology

There were three channels for the public to provide their written comment: by email, through an online survey (via Survey Monkey), or by post (hard copy forms).

The primary question asked was:

“Do you agree with the proposed use of section 71 of the Greater Christchurch Regeneration Act 2016 to make the necessary planning changes to enable the relocation of Redcliffs School to the site of the current Redcliffs Park and the establishment of a park on the site of the current Redcliffs School?”

The following questions were also asked:

- Why do you agree/disagree and any other comments?
- If you consider there are compelling reasons why your name and/or feedback should be kept confidential, please outline below.

Respondents were also asked to provide their name and address.

Summary of submissions received

A total of 353 submissions were received. The majority of these were individual submissions (336 of total 353 submissions, or 95.2 percent), and the remainder were joint public submissions (12 submissions) and submissions from organisations (5 submissions).

The majority of submissions (287 of the 353 submissions, or 81.3 percent) were received through the online survey. The breakdown of channels is provided in Figure 1 on the next page.

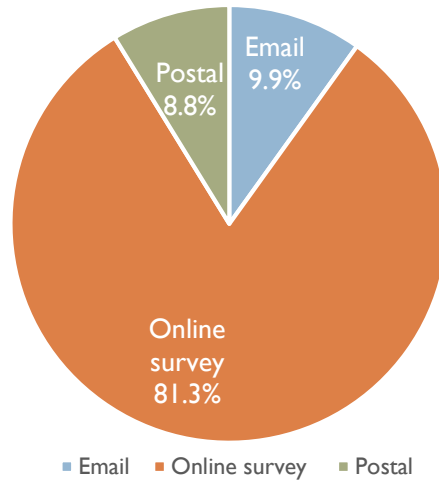


Figure 1: Submissions by channel

Submissions largely originated from individuals or organisations based in greater Christchurch (319 of total 353 submissions, or 90.4 percent), and the remainder originated from elsewhere in New Zealand or overseas. The breakdown of areas is provided in Figure 2 below.

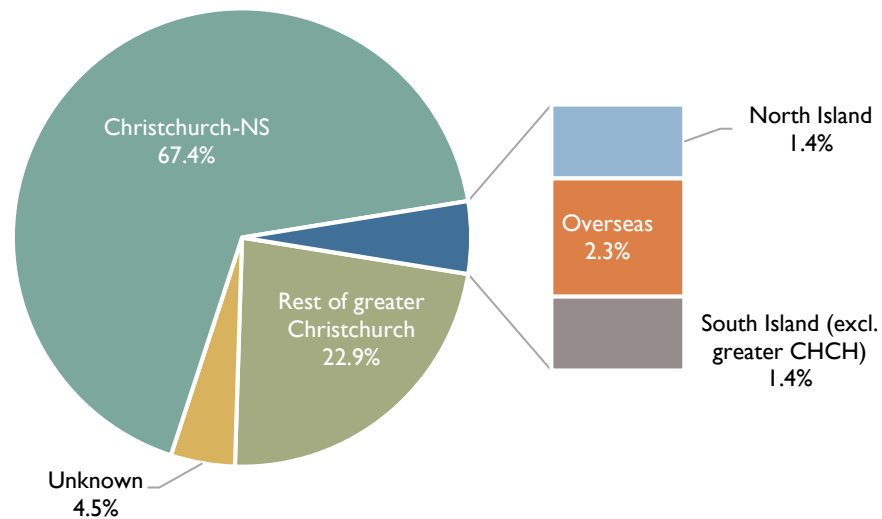


Figure 2: Submissions by area

Note: Christchurch NS (Neighbouring Suburbs) = Redcliffs and its seven neighbouring suburbs (Sumner, Richmond Hill, Clifton, Moncks Bay, Mount Pleasant, Ferrymead, and Heathcote Valley).

The Final Results

Of the 353 submissions received, 236 (or 66.9 percent) were in favour of the Proposal, 114 (or 32.3 percent) were against the Proposal, and three submissions (or 0.8 percent) were neither for nor against the Proposal. Those not directly opposing or supporting the Proposal were all organisations, as opposed to members of the public. The breakdown of the results is provided in Figure 3: Final results from question one (agreement with proposal) below.

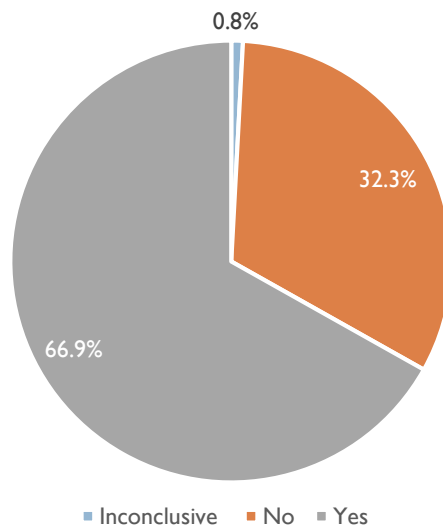


Figure 3: Final results from question one (agreement with proposal)

Analysing the responses

Due to the multi-channel approach (online survey, email, post), it was possible for the public to deliver multiple submissions. Submissions could also be made as an individual, or jointly (e.g. as a couple). Taking consideration of this, the impact of joint submissions and repeat submissions was tested (i.e. if a couple made a single submission, these were counted as two submissions, and repeat submissions were removed). The impact of these submissions on the final results is minimal, as illustrated in Figure 4 below.

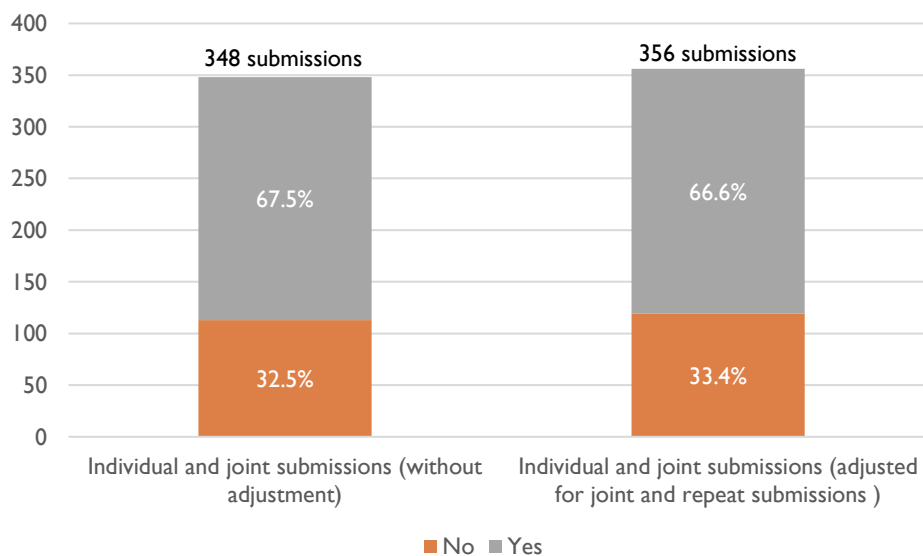


Figure 4: Compared results before and after adjustment (excluding the five submissions from organisations)

Thematic Analysis of Submissions Received

The unadjusted submissions were used for the thematic analysis. Each submission was reviewed, and patterns within the submissions were recorded. These patterns were grouped under the following five in scope common themes (themes ordered by number of submissions received):

Themes in support of the Proposal

- **Theme One** – Urgency to re-establish a school back within the community;
- **Theme Four** – Benefits of Redcliffs Park as proposed site.

Themes outlining concerns with the Proposal

- **Theme Two** – Natural hazards and other safety concerns with the proposed Redcliffs Park site;
- **Theme Three** – Loss of recreational space;
- **Theme Five** – Alternative legislative process.

It is noted that the themes may be perceived as being imbalanced towards the submissions that were against the Proposal. The reason for this perceived imbalance is that the submissions supporting the Proposal predominantly centred on the first theme, and these submissions were often concise.

Note that multiple themes can be covered within one submission, and those that provided comments that fell under a theme in support of the Proposal, may not necessarily have supported the Proposal overall. Conversely, those who provided comments that outlined concerns with the Proposal, may have supported the Proposal overall.

Out of scope comments

As the former Minister of Education has made the decision (on 1 November 2016) that Redcliffs School would relocate to the nearby Redcliffs Park and the former school site would become a park, any comments seeking to re-litigate that specific decision were regarded as out of scope.

Out of the 353 submissions received, 127 submissions contained out of scope comments recommending a change in the policy decision made by the former Minister of Education and/or questioning whether the correct process was followed. Of these 127 submissions, 103 (or 81.1 percent) did not support the proposed use of section 71 of the GCR Act.

A number of those who recommended a change in the policy decision, commented that the School could either:

- *return to the original site on Main Road; or,*
- *move to an alternative site to the original and proposed sites (e.g. Barnett Park).*

Cost implications of moving the School to Redcliffs Park was one of the common reasons provided for retaining the School on the original site, with some commenting that the on-site risks could be mitigated.

In addition, some submissions raised concerns related to the process the Ministry of Education followed in advising the former Minister of Education, that Redcliffs School should be relocated to Redcliffs Park. In particular, the concerns relate to the opportunity for community input into this decision, and whether the former Minister was provided with adequate and balanced advice.

Theme One – Urgency to re-establish a school back within the community (214 submissions)

Out of all the themes identified through the thematic analysis of the 353 submissions received, the *urgency to re-establish a school within the community* was the most frequent theme encountered (214 out of the 353 submissions, or 60.6 percent). Out of these submissions, 197 (or 92.1 percent) supported the proposed use of section 71 of the GCR Act.

Two prevalent sub-themes have emerged:

- *The school's role as an essential part of the community; and,*
- *The need for a sense of urgency.*

The school's role as an essential part of the community (sample keywords: community, neighbourhood – 127 submissions)

“Redcliffs School is an important part of this community. Its re-opening with minimal delay is in the best interests of the community, the parents and the pupils.” – Individual submission

The role of the school in the community was frequently commented on, with 127 submissions (36.0 percent of the total submissions) emphasising the community benefits, and 23 submissions specifically commented on the School's role as the 'heart' or 'hub' for the Redcliffs community. Three of the submissions noted that the return of the school would encourage young families and/or families with children to move into the area, and that this in turn would help strengthen the Redcliffs community.

The need for a sense of urgency (sample keywords: time, years, wait – 50 submissions)

“[...] (This organisation) recognises and understands the importance of Redcliffs School to the Redcliffs community in particular, and is supportive of its speedy return to that community.” – Strategic Partner submission

A large number of the submissions within this theme (50 out of the 214 'Yes' submissions) commented on the length of time that the Redcliffs community has been left without a school (the school has been operating from the van Asch Deaf Education Centre in Sumner since the middle of 2011). The comments centred on the need to re-establish a school within Redcliffs as soon as possible, however the preferred time period for the reinstatement of the School within Redcliffs is not precisely defined in the submissions.

Theme Two – Natural hazards and other safety concerns with the proposed Redcliffs Park site (91 submissions)

As highlighted earlier in this report, a total of 114 submissions were against the Proposal to use section 71 of the GCR Act to make the necessary planning changes to enable the relocation of Redcliffs School. Natural hazards and other safety concerns were highlighted as common reasons for rejecting the Proposal (80 out of the 114 submissions, or 70.2 percent of the 'No' submissions).

Natural hazards encompasses a wide range of natural forces, however in the context of the Proposal flooding, liquefaction and tsunami risks have emerged as the most common concerns noted within the submissions.

Natural hazard risks (sample keywords: flooding, tsunami, inundation, tide, climate change, sea level – 49 submissions)

“In our opinion putting the Redcliffs School in Redcliffs Park has been poorly thought out, due to flooding. Last winter Celia Street was flooded on several occasions when there was a high tide and full moon. This is going to happen more frequently in the future with climate change.” – Individual submission

Natural hazards was a common concern raised by submitters. Using a sample of relevant keywords ('flooding', 'tsunami', 'inundation', 'tide', 'climate change', and 'sea level') a total of 49 submissions were opposed to the Proposal due to the perceived risk of flooding and a tsunami impacting the site.

While neither implicitly supporting nor rejecting the Proposal, Canterbury Regional Council advised that the use of Redcliffs Park *“does not meet the required exceptions under Policy 11.3.1 of the Canterbury Regional Policy Statement due to the site likely to require new or upgraded hazard mitigation works in the future to mitigate or avoid natural hazard risks.”*

In its submission, Christchurch City Council officers advised that *“[...] there are no current or future coastal mitigation measures proposed for this stretch of the coastline. This means that overtopping of the revetment-stonewall-boat ramp frontage in front of Redcliffs Park will occur with increasing frequency in the future”*. With this in mind, they have advised that:

- *“The Ministry of Education should be required to provide emergency vehicular access off Main Road as part of the design of the school, in light of the natural hazard and known flood risk. In Council officers’ view, it would be inappropriate to leave planning for alternative pick-up and drop-off locations through a Flood Response Management Plan, until after the layout of the school has already been determined (this situation is implied by the wording of proposed designation condition 18); and,*
- *“The Ministry of Education should explicitly acknowledge that the new site has flooding issues and while there is uncertainty, may become unsuitable as a school location within a 50 year time frame.”*

In addition, two submitters raised a concern on the logistical difficulties of evacuation in an emergency. One submitter noted that in the event of an emergency such as a tsunami or major storm, *“[...] school pupils would have further to go to escape to higher ground and traffic would impeded [sic] considerably on local residents in both Celia street and Beachville Road. These streets would also be attempting to evacuate under emergency circumstances the hundreds of children added to those numbers would mean major congestion and risks.”*

Other safety concerns

In addition to the natural hazard risks, some of the submitters raised concerns about the quality of the land. For example, five of the submissions noted that the Redcliffs Park site was previously used as a waste disposal site. Three submissions raised a concern that with the proposed site being close to the estuary, there was a risk that children’s lives may be endangered.

Theme Three – Loss of recreational space (32 submissions)

The potential negative impact of the loss of Redcliffs Park as a recreational facility was cited as a concern within 32 of the submissions (9.1 percent of the total submissions received). The use of the park for sports, popular events (e.g. the ASB Summer Starter which finishes at Redcliffs Park), and other community activities were cited as examples of the recreational activities that take place within the park. A total of 12 submissions noted that Redcliffs Park is used by a wide range of people, including young children, families, and the elderly. The privacy of the park was an example mentioned within one submission, as a reason for the elderly’s use of the recreation space.

Two prevalent topics were identified through the submissions received:

- *The unique location of the park; and,*
- *The impact on neighbouring properties.*

The unique location of the park

“The changing of the Redcliffs Park to a school does not enhancement [sic] of community facilities and public open space – it is a waterside park which currently enhances to local community and the new Coastal Pathway. The changing of park site to the current school will lessen the quality of the park by removing it from its coastal location.” – Individual submission

Although some submissions acknowledged that the old Redcliffs School site on Main Road would be used as a park, 15 noted that Redcliffs Park is unique due to its proximity to the sea. A total of 11 respondents also noted that Redcliffs Park is frequently used due to it being connected to the Coastal Pathway.

The impact on neighbouring properties

“Redcliffs Park is surrounded by residential properties on three sides. These properties have been established for many years and a number of them have recently been replaced due to land movement due to the recent Christchurch Earthquakes. Having a primary school locate onto Redcliffs Park will cause major issues for these rate paying land owners. Some of these issues will be land disturbance, noise and environmental pollution due to construction activity and loss of value due to other factors” – Individual submission

The impact on neighbouring properties was an issue raised within seven of the submissions. Possible impacts raised within the submissions included; loss of views, disturbance due to construction activity, loss of recreational space adjacent to properties, and reduction in property values. The impact to property values was raised within five of the submissions.

Theme Four – Benefits of Redcliffs Park as proposed site (4 submissions)

Four short submissions mentioned the benefits of Redcliffs Park as the proposed site for the School. These included:

- *The benefits of the surrounding natural environment to children;*
- *Flat and safe site enabling ease of construction; and,*
- *The school will complement the surrounding landscape.*

Theme Five – Alternative legislative process (3 submissions)

Out of the 353 submissions received, three submissions contained comments recommending the use of a different legislative tool than section 71 of the GCR Act to implement changes. One submission states that the proposed plans “[...] should go through the RMA and all correct checks and balances should be in place. I believe it should not be rushed through under the pretext of disaster recovery which will lack transparency.”

A second submission commented that “An alternative to s71 action is to have the proposal considered by a Joint Panel of the Christchurch City Council and the Canterbury Regional Council. This process has been standard practice in the past and used when there are issues in a proposal that both Councils must consider designation at both sites. Action under S71 is not appropriate or “Preferable”. The view held by Regenerate Christchurch that another process would “take time” is not correct as the Joint panel can meet in a relatively short time period.”