

Redcliffs School and Redcliffs Park Submission Comments

	Do you agree with the proposed use of section 71 of the Greater Christchurch Regeneration Act 2016	Why do you agree/disagree	Other comments
1	Yes	I think that the proposed new school site will be a good alternative for Redcliffs school. The Redcliffs community will benefit hugely from having its school back at the centre of where families live.	
2	Yes	This community needs a school. The school is the heart of the community and they have waited a very long time to get back to Redcliffs.	
3	Yes	We want the school built back in Redcliffs and this site has been approved.	No
4	Yes	Redcliffs school needs to be back in the heart of its community. The community needs its school and park. The new site will be a great site for the school.	
5	No	I wish to express my opposition to the proposal to move Redcliffs School to Redcliffs Park. Redcliffs Park has been a valued seaside community park for over a hundred years and continues to attract new users with the new cycleway. As the Board of Trustees of Redcliffs School said in October 2016 submission, "The Board's view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board's view is based on the fact that there are no objective	As the Christchurch City Council said, "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. Both the Regional Policy Statement and the District Plan seek to avoid new development in such areas of high flood hazard, and

		<p>reasons why the school should not return to the Main Road site." Though the Board's view changed following the decision by the then-Minister of Education, Hekia Parata to move the school to Redcliffs Park, the facts have not:</p> <ul style="list-style-type: none"> • Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a re-location to any other site. • There is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has built in resilience to sea level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary. • The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community. • It is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated by a Canterbury earthquake, and can hit the shore in minutes with no warning. • The park is right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated, and is completely unnecessary. • Sea level rise of even a metre – which is absolutely inevitable – would obviously drown Redcliffs Park and mean that the school if relocated, would be perched overlooking not a park but the estuary. The danger of drowning would be even more 	<p>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." Therefore the proposal should address why it is being proposed in such an area. It didn't. It should be withdrawn.</p>
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		<p>acute, and there would be no playing fields. Worse, Redcliffs Park would have been taken for no reason.</p> <ul style="list-style-type: none"> • Redcliffs Park is used more and more every week. The Coastal Pathway brings cyclists, roller skaters, walkers and joggers to the Park in increasing numbers. The Fun Run brings hundreds at once once a year, the Park is used by school sports in weekend, and every single day by children playing in the park, by families picnicking, and by families kicking a ball around. There are far too few green spaces. To take one for a school, beside the ocean, particularly when it is unnecessary, is not only wrong, but would be a historic mistake. The Proposal failed to consider the three obvious alternatives: <ol style="list-style-type: none"> 1. Returning the school to the existing school on the current site, and 2. Rebuilding the school on the current site; and 3. Moving the school to another site such as Barnett Park. A review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the Greater Christchurch Regeneration Act 2016 (GCR Act). <p>We therefore request that</p> <ol style="list-style-type: none"> i) you reject or place on hold the exercise of power under section 71 of the GCR Act, and ii) Request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site. 	
6	No	<p>I wish to express my opposition to the proposal to move Redcliffs School to Redcliffs Park. Redcliffs Park has been a valued seaside community park for over a hundred years and continues to attract new users with the new cycleway. As the Board of Trustees of Redcliffs School said in October 2016 submission, ““The Board’s view is that the Minister should</p>	<p>As is noted in the proposal: the lower land levels of the proposed school site are identified as being subject to natural hazard risks comprising: flooding, liquefaction and tsunami. As the City Council said, “The flooding issues associated with the use of the lower part of the proposed school site have been</p>

	<p>confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board's view is based on the fact that there are no objective reasons why the school should not return to the Main Road site." Though the Board's view changed following the decision by the then-Minister of Education, Hekia Parata to move the school to Redcliffs Park, the facts have not:</p> <ul style="list-style-type: none"> • Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a re-location to any other site. • There is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has built in resilience to sea level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary. • The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community. • It is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated by a Canterbury earthquake, and can hit the shore in minutes with no warning. • The park is right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated, and is completely unnecessary. 	<p>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. 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." It did not, and should have. For that reason alone it should be withdrawn, and the Minister of Education asked to reconsider the decision made by the former Minister of Education to move the school, and to consider re-establishing the school on its current site, which is perfectly feasible.</p>
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7	Yes	Redcliffs needs a school in its community and this is the best site for it	
8	No	<p>I wish to express my opposition to the proposal to move Redcliffs School to Redcliffs Park. Redcliffs Park has been a valued seaside community park for over a hundred years and continues to attract new users with the new cycleway. As the Board of Trustees of Redcliffs School said in October 2016 submission, ““The Board’s view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board’s view is based on the fact that there are no objective reasons why the school should not return to the Main Road site.” Though the Board’s view changed following the decision by the then-Minister of Education, Hekia Parata to move the school to Redcliffs Park, the facts have not:</p> <ul style="list-style-type: none"> • Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a re-location to any other site. • There is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has built in resilience to sea level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary. • The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community. • It is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated by a Canterbury 	

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		<p>earthquake, and can hit the shore in minutes with no warning.</p> <ul style="list-style-type: none"> • The park is right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated, and is completely unnecessary. • Sea level rise of even a metre – which is absolutely inevitable – would obviously drown Redcliffs Park and mean that the school if relocated, would be perched overlooking not a park but the estuary. The danger of drowning would be even more acute, and there would be no playing fields. Worse, Redcliffs Park would have been taken for no reason. • Redcliffs Park is used more and more every week. The Coastal Pathway brings cyclists, roller skaters, walkers and joggers to the Park in increasing numbers. The Fun Run brings hundreds at once once a year, the Park is used by school sports in weekend, and every single day by children playing in the park, by families picnicking, and by families kicking a ball around. There are far too few green spaces. To take one for a school, beside the ocean, particularly when it is unnecessary, is not only wrong, but would be a historic mistake. <p>The Proposal failed to consider the three obvious alternatives:</p> <ol style="list-style-type: none"> 1. Returning the school to the existing school on the current site, and 2. Rebuilding the school on the current site; and 3. Moving the school to another site such as Barnett Park. <p>A review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the Greater Christchurch Regeneration Act 2016 (GCR Act).</p> <p>We therefore request that</p>	
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		<p>i) you reject or place on hold the exercise of power under section 71 of the GCR Act, and</p> <p>ii) Request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site.</p>	
9	No	I am 5. I love my park. I want to keep playing at the park. I don't want the school there.	
10	Yes	All the work has been done to show that this is the best area for the school.	
11	No	I am 9 and live near the park. I do not want the school to move to the park. Why does the school have to move? I want to keep playing at the park. What is wrong with where the school is now?	
12	No	I am a school pupil who lives near the park. I don't want to lose the park and don't understand why the school has to move at all. The reasons that have been given don't make sense.	
13	Yes	I agree because it is incredibly important to have Redcliffs School continue - it is such an important part of the local children's lives - the education they receive at the School is second to none. It would be remiss of the government not to consider this and should relocate the school to a local site. As a local parent with a young child at the current site in Van Asch, I feel compelled to urge the current government to please consider the needs of these local children - Redcliffs school is a community in itself and one that I value for my child very much. Please ensure the local education provision continues on this new proposed site. Thank you.	
14	No	The Redcliffs Park is more subject to flooding/tsunami, the existing school site is safer. None of the children who were pupils at the time of the 2011 earthquakes would be	

		returning to Redcliffs school (ie no trauma associated with the current school site). A school already exists at the current school site - is saving many millions important to the Govt?	
15	Yes	Redcliffs needs its school back and the park is the best place for it now that the current site is not an option.	s9(2)(a)
16	No	There is nothing to gain from the move and the new site is lower and consequently at greater risk from extraordinary high tide flooding, as well as tsunami. Don't do it!	That all that need be said!
17	Yes	There is a compelling need for a school in the Redcliffs community. Schools in surrounding areas are at capacity and would require difficult and unnecessary travel for the local children to attend. The school in Redcliffs is vital to keep the community together and allow the community to flourish and engage. There is widespread support for a school and the local community is very supportive of maintaining a local school. Given the widespread and ongoing disruption to the school since the earthquakes the proposal to relocate the school to this new site and to use the old site for other recreation purposes achieves the aim of re-establishing the school as soon as possible with the added benefit of increasing the sports/recreation facilities at the old site. I fully support this proposal and would like to see it progress as quickly as possible.	
18	Yes	I'd think Redcliffs needs it's school back in Redcliffs	
19	Yes		
20	Yes	The Redcliffs area needs it school back in the area. This has taken too long and this is the best option.	
21	No	Because Redcliffs school needs to exist in Redcliffs on its original site - relocated to the front of the site away from rock roll/fall, cliff collapse. City based Children should have a right to bike to school and from Redcliffs they can't bike to	I personally would like them home in their original site - away from wind, flooding and tsunami risk.

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		Mt pleasant and van Asch (due to the coastal pathway being incomplete).	
22	No	It isn't necessary. There is absolutely nothing wrong with the current location. It is SAFE. The idea of moving the school is insane, apart from cost, the new location is much less practicable given that it is more prone to flooding, future sea level changes, cost and potential tsunami's (which we had to drill for) when our children attended Redcliffs school. This is political and a nonsense!	
23	No	<p>One pager I wish to express my opposition to the proposal to move Redcliffs School to Redcliffs Park. Redcliffs Park has been a valued seaside community park for over a hundred years and continues to attract new users with the new cycleway. As the Board of Trustees of Redcliffs School said in October 2016 submission, ““The Board’s view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board’s view is based on the fact that there are no objective reasons why the school should not return to the Main Road site.” Though the Board’s view changed following the decision by the then-Minister of Education, Hekia Parata to move the school to Redcliffs Park, the facts have not:</p> <ul style="list-style-type: none"> • Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a re-location to any other site. • There is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has built in resilience to sea level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary. 	

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		<p>1. Returning the school to the existing school on the current site, and</p> <p>2. Rebuilding the school on the current site; and</p> <p>3. Moving the school to another site such as Barnett Park.</p> <p>A review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the Greater Christchurch Regeneration Act 2016 (GCR Act).</p> <p>We therefore request that</p> <p>i) you reject or place on hold the exercise of power under section 71 of the GCR Act, and</p> <p>ii) request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site.</p>	
24	Yes	Closer to the home of my nephews	No
25	Yes	Redcliffs needs a primary school back ASAP The community have been consulted many times on this subject and it is overwhelming in support of the School returning.	Only that it should proceed as soon as possible
26	Yes	Notwithstanding that Redcliffs school shouldn't need to be moved off its existing site at all, the Redcliffs community needs a school and a park. The proposal to use Section 71 of Greater Chch Regeneration Act 2016 will ensure that the Redcliffs community gets its school back as quickly as possible & also retains its open space areas.	
27	Yes	The Redcliffs School is long overdue to return to Redcliffs. There has been endless procrastination by the Government over the last 5-6 years. At last a decision was made and now it should be made as smooth as possible by the means available with the use of this section.	The proposal will always have naysayers and yet more people trying to hold it up. The only people it really affects are the children, the teachers, the parents and finally the wider community feeding into this great school. Those making the decisions would do well to remember the unity of our community as regards this school.
28	No	The current site and school is more than sufficient and relocation is unnecessary. The argument that future students	

		may suffer from any possible interrupted education outcomes if any new major event, such as an earthquake occurs, is self defeating, as this would likely occur at any new site. The cost involved in relocating is large, and, if earthquake protection such as that installed behind Peacocks Gallop near Sumner beach is sufficient to protect a major road, why is it not sufficient to protect a school?	
29	No	If it's for its safe for playground on old site it's safe for school. New site prone too flooding.	As above
30	Yes	It's the best option/site for the school to be returned to Redcliffs	
31	No	1/ Redcliffs Park is an extremely valuable and prime seaside (estuary) recreational facility for all members of the public to use at all times. 2/ The aesthetic qualities of Redcliffs Park must not be destroyed forever by school buildings. 3/ The existing parkside residential properties values will be decimated. 4/ The demolition of the old school and the construction of a new school will be very wasteful in terms of materials and carbon emissions. This kind of waste is not acceptable in this environmentally sensitive era.	Redcliffs Park is a very bad site for a school and the Christchurch City Council and the Minister for Greater Christchurch Regeneration should not go ahead with making Redcliffs Park available for use as a school.
32	No	First off Redcliffs needs its primary school. If there is no alternative but Redcliffs Park then I agree with the proposal. However I just can't see why the school cannot be returned to its original site. No one has said the site is dangerous. The main reason for the move is psycho social issues for children. That is just ridiculous so kids can play football or potentially skateboard there with no regard for PS concerns? If the new school is built the first thing children see when they walk onto Main Rd is a cliff face (moa bone cave). No PS issues there? It will be cheaper to reinstate the school on its current site. We know the site works because it has for over	

		<p>a hundred years. It never floods. Redcliffs park is constantly covered in large puddles in winter and does not drain well. It is exposed to the easterly and gets bitterly cold in winter. Building a new school will cause disruption and loss of quality of life for the residents bordering the park in this unique environment. According to the CCC the park is susceptible to climate change and potential inundation. It defys logic to waste tax dollars on this risk. It needs to last 100 years not 30. The reports refer to tsunami risk from far away off shore earthquakes however recently more risk is said to come from the Hikurangi Trench and Banks Peninsula being a wave amplifier. If the children were at the current Main Rd site they would get to higher ground much quicker. Someone in this new govt needs to be brave enough to overturn this strange decision by the previous minister and start proceedings to get the school back on its current site. It's what the community and the school board wanted originally.</p>	
33	No	<p>Site prone to coastal inundation, flooding, not a suitable site for a school, traffic congestion, the old site is still suitable. The negative effects to the surrounding properties of redcliffs park, the park is much more suitable for its current uses.</p>	The old site is still a suitable alternative
34	No	<p>The park is in a coastal inundation zone it is a hazard area where housing would not be allowed how could a school be safe there? Road congestion will be an issue turning in from the main road will be massively congested on a normal school day god forbid in an emergency what a catastrophe it would be.</p>	
35	No	<p>Redcliffs Park has been shown to be vulnerable to considerable flooding, is close to the Estuary which would make the site vulnerable in a tsunami, the original site of the school can be made safe in the case of future quakes by building of a bund. The classrooms are already there and the</p>	

		community hall could be demolished or moved forward. For the majority of children the old site does not involve them crossing the busy main road.	
36	No	<p>1. The current school site can be made safe. The Ministry accepts that the current school site can be made safe by the construction of a bund at the foot of the cliff. The safety analysis of the proposed site at Redcliffs Park does not take into account the proximity of the estuary to the park and the danger this poses to children.</p> <p>2. The site selection criteria used by the ministry to select Redcliffs Park are arbitrary and so meaningless. Alternative sites have been ranked according to a list of twenty criteria that are each scored on a 1 to 5 scale. The site with the highest total is then the "best" option. The problem with this method is that all criteria are assigned equal weight. This is arbitrary and so makes the final scores meaningless. If, for example, the "Cultural or other significance" and "Opportunities of co-location" criteria were both given twice the weighting of the other criteria, then the total scores for Redcliffs Park Location C and Barnett Park Location D would be about the same. Without a justification for giving all criteria equal weighting, the ranking methodology is meaningless. The Ministry specifically asked that the current school site not be included in the ranking process. It is arguable that using the current (flawed) ranking methodology the current site would score around 95, significantly higher than the "best" alternative site, Redcliffs Park Location C, which scored 71.4.</p> <p>3. A new school at Redcliffs Park would be built in an area identified as unsuitable for new building because of its susceptibility to inundation. Redcliffs Park is in the Christchurch City inundation zone. It was the City Council's intention to limit further building in this zone. Why is a school to be constructed in this zone?</p> <p>4. The minister's concerns about</p>	

		<p>potential psychosocial effects on children are unfounded and can easily be addressed. The minister has said she is concerned about the ability of the school to manage psychosocial effects in children and is using this as the main reason for relocating the school. This is overstated for the following reasons: - No children who will attend Redcliffs School from 2018 onwards were at the school at the time of the 22 Feb 2011 earthquake, which severely damaged the cliffs. - Parents who have concerns about the safety of the cliffs will be unlikely to send their children to the school. - Children in other areas of Christchurch have been affected by the earthquakes – have other schools had to manage psychosocial effects in their pupils to any great degree? - What evidence does the ministry have that the psychosocial effects in children returning to school at the current site (Main Road) will be an actual concern, rather than an imagined one, warranting the building of a completely new school? The psychosocial assessments that were commissioned indicated that any effects would be highly likely to be minor. 5. The minister's concerns about potential disruption at the current school site should also apply to the Redcliffs Park site. The minister said she is concerned about the potential for disruption of school services at the current site, resulting from future events. What possible events would cause disruption at the current site, but not also at Redcliffs Park? Significant earthquake events affecting Redcliffs would cause disruption at both the current site and the Redcliffs Park site. It is arguable that because of the location of the park alongside the estuary there could be a higher chance of disruption at the Redcliffs Park site. What is to be gained with respect to future disruption by moving the school? 6. The minister's (at the time) final decision leading to this whole process does not</p>	
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		<p>logically follow from the interim decision. The interim decision of 25 Nov 2015 was that Redcliffs School should close. The final decision of 1 Nov 2016 is that Redcliffs School can stay open, but must move to another location. The final decision does not logically follow from the interim decision: why wasn't the initial (interim) decision that the school could stay open if it relocated? Other schools in Christchurch have been closed in the wake of the earthquakes, so was this actually an attempt to add Redcliffs School to the list of closures in order to save money? There will undoubtedly be a lot of support for the proposal from people in Redcliffs who are directly connected with the school, but this is out of fear of losing the school altogether. When considering the responses it should be kept in mind that the school's initial position and response to the minister strongly supported keeping the school at its original site. All expert reports support this option too. The best response is to overturn the previous government's decision and keep the school at its current site</p>	
37	No	<p>Redcliffs School should return to the existing safe school on its existing site. The Ministry of Education has refused to give any cogent reason for abandoning the site. Section 71 prevents a proper hearing on this matter. Section 71 must not be used when there is a valid alternative to the proposed land swap.</p>	<p>Redcliffs Park is an excellent, much used public waterfront park. It is however flood prone (flooded twice in 2017) and unsuitable as a school site. The Ministry of Education consulted no-one about taking the park. Analysis of the options for a school site in Redcliffs make it the least suitable site of the three available. The existing school site is far away the best site according to the Ministry's site analysis tool.</p>
38	Yes	<p>Using Beachville Road access to the new school on the current Redcliffs Park site for school carparking and school pickups by parents (who sometimes double park and create irrational traffic moves when picking up children) there should be straightforward flow and less obstructions to</p>	

		manoeuvre around for all the types of traffic that use the Main Road at Redcliffs. Redcliffs Park is also in a central location with easy access for emergency vehicles such as fire and ambulance vehicles.	
39	Yes	<p>1. Redcliffs School is an important part of this community. It's re-opening with minimal delay is in the best interests of the community, the parents and the pupils.</p> <p>2. We support the school being re-opened on its existing Main Road site, a much better and safer site for a school. However we understand that this possibility is not part of this current consultation.</p> <p>3. It is essential that the existing school site is retained in public ownership. It will be needed in the future when the Redcliffs Park site is found to be unsuitable for a school, for the reasons of sea level rise and climate change, and relocation of the school is needed.</p>	There has been far too much time wasting and consultation, and action to re-open the school is well overdue.
40	Yes	We need the school back in Redcliffs and this is the best compromise that could be reached with the Ministry.	
41	Yes		
42	Yes	I highly value having a school in our neighbourhood and this seems the best allowable site.	
43	Yes	Because it is vital that Redcliffs school returns to Redcliffs and if this is the only option then it must be this.	No
44	Yes	It is essential for the community that Redcliffs school returns to Redcliffs, whether it be there or somewhere else is not that important to me, but it seems suitable.	The delays in this process have been unacceptable, too much talk not enough action. Get it done, return to normality please.
45	Yes	Because I think the school needs to be back into the community.	
46	Yes	A safe site close to the previous school site and within the community where the students live.	
47	Yes	To get a school back in Redcliffs	
48	No	The Redcliffs Park is unsuitable for a school because of the danger of flooding and tsunami, also some of the land is	

		toxic. Also the prevailing easterly wind can be very cold. The school are happy to go back to the old site which will save money. If it is considered safe for a park it must also be safe for a school.	
49	No	The argument as to why the school cannot go back to its original site on main road just doesn't stack up - if it is suitable for a public park, it is suitable for the school to go back there at what I would imagine would be far less cost and inconvenience to home owners, coastal pathway users and the general public in relocating the school to Redcliffs Park - a site vulnerable to flooding and coastal erosion - it just doesn't make sense. The school deserves to come home to Redcliffs, back to its original site which could be made safe at a fraction of the cost of developing a whole new site.	
50	Yes	It's crucial that these kids get back to Redcliffs and the school that was theirs and the new site would be a huge pasty of their mental rebuild.	
51	Yes	We need our school back and Redcliffs Park is the most suitable alternative site.	No
52	Yes	Because the children need a school in Redcliffs and this is deemed to be the best option.	No
53	Yes	I agree because the Redcliffs community needs its school back.	
54	Yes	The new site for the school seems like a good option and one which would keep the school in the local community which we are in need of. The new site is a very good option for the location of the new school, due to its proximity to the community and space.	
55	Yes	Need to re-establish Redcliffs school to or near it's original site, but at a safe distance from potential rockfalls, so the Redcliffs park site seems ideal.	No
56	No	There is absolutely no need to relocate the school and therefore no need for any re-zoning of either site. The	Why ask for feedback when the decision is taken?

		current school site has never been safer - if looked at in isolation from the angle of earthquake risk. The risk aversion of bureaucrats who fear anything happening on their watch should not be driving the process.	
57	Yes		Sooner the better. It's over 6 years. That's almost a whole school generation. Move on
58	Yes	I think this will be a great new location for my children to go to school.	I think this is a positive step in the right direction for a school that has gone through so much over the last 5 years.
59	Yes	Redcliffs community need a school in the area, the parents students and teachers have waited patiently and worked hard to ensure that this will happen.	The process has taken so long already, any more delays would be heartbreaking for this community!
60	Yes	It's important to keep the school in the community	No
61	Yes	I want Redcliffs School back in Redcliffs. Planning will take into account any issues people are talking about.	
62	Yes	To get the school back in Redcliffs this is the most current logical option	
63	Yes		
64	Yes	It's best for the Redcliffs community to have their school back locally. By moving the recreational zone to the original school site and shifting the school to the current park site the community isn't losing any of its facilities.	
65	Yes	Redcliffs needs a school as hasoon been widely debated, and agreed in by bipartisan governments. this park redesignation is the clearest path to allowing this to happen.	if the school could remain at the existing site it would be better.
66	Yes	I agree because the use of the Regenerate Act enables the return of Redcliffs school to it's rightful place in the community in the best possible timeframe. We have been waiting too long for this progress and the use of the Act delivers the school to the Redcliffs community in a much needed timely manner. It also encourages progress to be made relocating the sports facilities to the former school site	No. Let's do this!

		which provides direction and stability for the sports groups and public that use the park space.	
67	Yes	It's the only currently available option for keeping a school in Redcliffs	I would have preferred the school to return to its original site on main road. The National government ruled this out on the grounds of safety. Although the evidence proved that it was a safe site.
68	Yes	Redcliffs community needs a local community school and if it cannot be back on the old site it needs to go on Redcliffs Park	
69	Yes	I agree that Redcliffs school should remain in Redcliffs but I can't see why it can't be at the old site. I believe all sorts of tests gave been made to say that that site is alright. So, I disagree about the new site, it's so low lying.	I have written it all above.
70	No	The Redcliffs Park is not suitable for a school and the School site is a more safe location	The decision to relocate the school was not made using common sense , more about losing face by the Minister
71	Yes	Redcliffs need a school. We still want old sight. But if we can't have there, we should keep Redcliffs park.	We wait 7 years. I think that is enough. Redcliffs people need Redcliffs school, Redcliffs school need Redcliffs people.
72	Yes	A school needs to be built and this is the best site due to not being allowed back on the Main Road site.	
73	Yes	I believe that the history, community and whanau engagement is vital to our school. Relocating back to the Redcliffs community will help provide a sense of normality and new beginnings following extremely difficult circumstances following the earthquakes.. It also provides a new chapter for our school and a real opportunity for our students, whanau and community to work closely with us in the relocation process.	
74	Yes	To keep school local and maintain a park space. Perfect	
75	Yes	I think it is exciting to have the new school on the waterfront exciting learning opportunities and hopefully the new design will support interactions with the community	

76	Yes	TO enable the expediation of the planning changes required to progress this key community resource	While I personally still believe the old school site is appropriate, that argument is long gone. As such I fully support the relocation to the proposed site, it has a wonderful aspect and the initial plans look like a clever use of the site
77	Yes	It is a fresh start after a long journey. The new space can be developed to accommodate the increasing changes and demands of education providers without the restrictions of an old establishment.	The location is so beautiful and the grounds are so wide and spacious.
78	Yes		
79	Yes	We need a school in Redcliffs and Redcliffs park is a good option.	
80	Yes	Because I would love Redcliffs to have a school back in Redcliffs, it is a lovely community and there is a real need for a local school	There will be no more money or gas wasted on buses, and it will be a special place to raise and teach Tamariki and make the community stronger
81	Yes	s9(2)(ba)(i)	
82	Yes	I believe the Redcliffs community do need a local primary school	No
83	Yes	I would like to see a school back in the community.	
84	Yes	I didn't want the school to return to the original site.	No
85	No	I don't see a lot of positives from this change and, knowing that this question has surfaced many times, still don't see why the current site cannot be retained. Now that Heika Parata's ego is no longer an issue, why can't the site be protected by bunding and/or fencing. The move to the proposed site will cause traffic issues and places the school closer to the rising sea.	I believe that cost is a factor in the decision to shift. Is a copy of the business case for the shift available to fellow-residents?

86	Yes	A school is critical in Redcliffs; after a long process the Redcliffs Park site has been identified as the most appropriate. The community now needs certainty.	I fully support the use of the powers under the Greater Christchurch Regeneration Act to allow this community to move on, based on expert advice that the site is suitable for a school.
87	Yes		
88	Yes	Redcliffs needs a primary school and this appears to be the only option the minister will allow.	
89	Yes	I believe it's a great way to get the plan moving forward and to get the school back in Redcliffs as soon as possible	
90	No	s9(2)(ba)(i)	
91	Yes	Redcliffs NEEDS a school. Hekia Parata decided this was the only option available. While my preference is to return the school to its original Main Road site, if moving to Redcliffs Park is the only option, I support it.	
92	Yes	Best option although returning g school to existing site is best option	
93	Yes	Although I think the school rebuild on Redcliffs Park is good for expediency for getting school back in community. However the main road site is a much better site not prone to flooding, it's not as exposed & a larger site. I do think it is short term view not to wait another year or two, for the process to get it back at Main Rd. Also the park at Main Rd would not have the protection of the bund, which the school would have. Seems ludicrous in terms of safety for one but not another.	Although I think the school rebuild on Redcliffs Park is good for expediency for getting school back in community. However the main road site is a much better site not prone to flooding, it's not as exposed & a larger site. I do think it is short term view not to wait another year or two, for the process to get it back at Main Rd. Also the park at Main Rd would not have the protection of the bund, which the school would have. Seems ludicrous in terms of safety for one but not another.
94	Yes	The school is desperately needed back in the community	
95	No	The school has been there for years move it closer to the road and leave the playing fields at the back .Easier access /parking for parents/pupils.	Think the move is crazy and expensive

96	Yes	Redcliffs needs a primary school back in Redcliffs!! I believe Redcliffs Park is a lovely site for this ,	
97	Yes	In principle a sound plan	Redcliffs main road site better option for a school. Less wind, sheltered by hill, less flooding
98	No	THE OLD SITE IS PERFECT	There are too many negatives for the Redcliffs Park site and the old Main Road site is still the best place for the school. Such a waste to not use the old school grounds and the buildings which could be brought up to modern standards much more cheaply than building a whole new school. Surely it's not too late for the Education Dept. to review the decision to re-site the school? Please consider my heartfelt plea as I have been following this vital debate with intrepidation!
99	No	The people who chose the site for Redcliffs School in 1907 had the right idea. The site is on higher ground that never floods and is the most sheltered site. The proposed site on Redcliffs park is on lower ground and is a very exposed site as well as being a flood site.	
100	Yes	I agree to the land swap only if there is no possible way for the school to remain on its original site. If it is possible for the school to stay where it is, on a site which is perfectly safe, then that is my preferred option.	The original site has been found perfectly safe to use so my initial vote is to use the original site. Should the Minister find the original site unsuitable then I agree to moving the school to Redcliffs Park and have the park moved to the school site.
101	No	Because it is a public space for the public to use in general not single use such as a school	The site the school sits on before the quakes is quite adequate for the school as long as the danger area is cordoned off there is more than enough room
102	Yes	I agree with this proposal because we need our school back in our community with the shortest delay possible. While I believe that the former main road site is also suitable, and the previous decisions to move from the former site were not evidence-based, the delays that would be necessitated at this stage are too long for our community and school.	

103	Yes	Redcliffs needs its primary school back in its community, it has been away far too long. The government and council need to do everything in its power to make sure this happens ASAP.	
104	No	It will be less disruptive for the community for the school to stay on its current site.	
105	No	s9(2)(ba)(i)	
106	No	I disagree. I'll try and sum up the scenario: Government closes school due to earthquake, even though four independent engineers have judged it to be safe. They decide to move it across the road, within metres of the sea on land which used to be a rubbish dump and that was subject to flooding. And this is well before climate change & rising sea levels have become a real problem. And on the site of Redcliffs Park, a brand new school is proposed. Well of course it is. Let's open a new school on an old rubbish dump and put children at risk from flooding and a potential tsunami. This is without mentioning the blindingly obvious parking problems at Redcliffs Park & the fact that the community will lose a rare and beautiful sea side park. And what's more because the site of the old school is so unsafe, a public park is proposed in its place. To a sane and mature person, this sounds like a farce. But, no this is reality. For the sake of common sense, let alone the total waste of time and money, which we the taxpayer are paying for, can some common sense please prevail.	
107	Yes	This process has taken too long and has left Redcliffs without a school for our young folk. Community growth is impossible without new young families settling in an area and Redcliffs has been left far too long without this essential component in its regeneration.	No

108	Yes	While I believe there is no reason to move, I think that now a decision has been made further delays are unnecessary and frustrating.	The prolonged delay has been caused by bad political decisions and redcliffs deserves better.
109	Yes	We need to keep the school and the Education Dept has made the ridiculous decision to not use the existing school site	Please stop procrastinating
110	Yes	It has be proven to be the best option for the school and the school is a crucial part of the community	The Redcliffs Park only gets used on occasion and is normally empty so it could be put to good use as a school.
111	Yes	Because it is logical & makes sense	Stop road blocking & get on with it!
112	No	The new site is highly likely to flood, is in an area badly effected by liquefaction, and with global warming high tides are a certainty.	The current sight is fine and a retaining wall as per Wakefield Ave would prevent any future rock fall. The school was used for the School Fair and showed that many of the building are in good state. Photos of the rock fall after the quakes show the area of damage which were mainly to the west and that once the hall is removed there are no other areas of rock fall.
113	No	It should stay where it is. There is a huge field out the back so surely it would make more sense to fence it off and bring the school forward? The grounds are bigger, the infrastructure is already there and the kids can cross safely at the crossing.	
114	Yes	It's time to get the school back to Redcliffs	Just hurry up
115	Yes	I agree. Redcliffs school is an integral part of the community, children and families already suffered the quakes, and then the subsequent closing of their school. This all has longterm effects on people's mental health. Swapping one park for another and resiting the park is a no brainer. Just do whatever needs to happen and get this community back together again ASAP.	No
116	Yes	Redcliffs community needs a school	It's very important for our community to continue to thrive that we have a school as soon as possible as

			the children have now been busing to Van Ash site for over 7 years now
117	Yes	It's my home town..love to see school open for Redcliffe kids.i went to the school.	No. Good luck
118	No	The park is susceptible to flooding. The original site is safe.	
119	Yes		
120	Yes	I agree as it should be original having Redcliffs school to be return to its original suburb	I believe the children would be much happier to return its suburb as out of VADEC area after being too far long out of Redcliffs and save hassle of traffic transport etc.
121	Yes	Because Redcliffs needs a school.	
122	No	Seems ridiculous to build new school when current buildings function have history and are deemed safe	No
123	Yes	Because it is the most efficient and effective approach to progress a process which has already been subject to extensive delays	Only that it will be a wonderful day when redcliffs kids can finally attend their local school IN Redcliff's
124	Yes	The children of Redcliffs deserve to have their pre-quake school back - one that they can walk to it is important to the community	No
125	Yes	Redcliffs have waited too long for their school to return, so anything that will speed this process up is good.	No as above
126	Yes	Because the school needs to stay in Redcliffs	
127	No	I disagree. There has been a change of government. Someone just needs to get the new Minister to propose they return to the old site with the Redcliffs BoT proposed mitigation measures. The proposed new site is in tsunami zone, prone to sea flooding and in 'filled' in the days when fill wasn't done very well. Goodness knows what they will find when they start digging, and therefore how much it will end up costing. I absolutely and fully support Redcliffs in having their own school however they need to be able to return to their old site. This is a much better option that the proposed site and someone just needs to have the gumption to be	

		brave and say the previous Minister (Hekia) got it way-wrong. I say be brave, admit a mistake happened (proposal to shift school) in order to avert a greater mistake (actually shifting the school to a shonky site). Get in touch with Minister Hipkins and do the right thing...	
128	Yes	Get the local school back to the Redcliffs community.	No
129	Yes	Redcliffs needs this community school	
130	Yes	Better than losing the precious school, though I prefer the old site	
131	Yes		
132	Yes	Our community is currently lacking in a heart, in the form of a school for our children. Young children give vitality and hope to a community. We need the children back in the Redcliffs area. A generation of our children have already been denied the right to attend a school based in their home community - action needs to be taken to ensure this happens in the very near future. The proposed land swap enables our children to return to the community for schooling whilst also retaining a recreation area. It appears to be a win-win situation.	NO
133	Yes	Redcliffs needs a local school to cater for local children. There is an opportunity to create a suitable community facility on the site	Mitigation against flood damage by elevation of the new buildings on the high part of the site should be expected
134	Yes	I believe it is a great site for the school	No
135	Yes	Because we need a school in our area and any further delays will just prolong the agony unnecessarily	Please hurry up and make the decision so we can have our school back in Redcliffs
136	Yes		
137	Yes	I think they need to have the school back and up and running	
138	Yes	I would prefer the existing location but this is the next best option. These students need to return to their school - it has taken too long.	
139	Yes	This is the perfect site for the new school, being in the middle of the Redcliffs area. Easy access and a really safe long term solution.	No

140	No	There is no substantive reason why the school should not return to its main Rd site	
141	Yes	Because Redcliffs school needs to existing they won't allow it to do so on the exisiting site.	
142	Yes	Keeping our school is imperative to our community it's the heart of our area. Keeping it in a location that is well established and the community knows as well as having the opportunity to make something amazing for our area.	
143	No	I think it should remain where it is. The evidence presented deems it safe.	
144	No	The original site is superior and safer.	
145	Yes	We need our school back where it belongs to serve the strong community of Redcliffs again towards proper education for our youth.	
146	Yes	Make sense after all the planning and time spent looking to relocate the site	Please just help this school get back into a functional place of their own!
147	No	I think the school should return to the original site.	Archaeological impacts (oldest in NZ?), sea level rise (site has <30 predicted lifespan) , it is an old dump site, main buildings planned on a pinch point (skinniest part of Main Road), Christchurch City Council and Canterbury Regional council both have issues with that site. Probably couldn't have picked a site with more potential issues to put the school. All of these are just going to add to the cost of the rebuild and it might not last a generation. Then in ~30 years the government will need to take more parkland to replace the school. Need to have a long term view not next few years. Everyone should be pushing to put it back at the old site. By the time it is rebuilt, there will be no kids who were present at the 2011 earthquake attending.

148	Yes	We need to have the school back in Redcliffs as soon as possible to bring the children back here. We are so lucky to have had it at van ash but it's so much better for the community to have them back. The new site is perfect, easily accessible	
149		I agree. My children will go to the new Redcliffs school. I'm keen to get the build underway.	
150	Yes	We need the school back in Redcliffs	
151	Yes	This proposal is vague, so let me make it clear that the school should be able to revert to its original site on the main road, as the site where it is supposed to be moved to is totally unsuitable. The original site is not endangered by rock fall risk, nor is it as endangered by sea level rise, the way the current site, insisted upon by the previous government, is.	
152	Yes	The suburb of Redcliffs needs their primary school back in the community, and since returning to the original site is not an option, I believe this is the next best scenario.	
153	No	Because there are no legitimate reasons it should not stay on its present site. The cost of relocating it is money which could be way better spent. The new site is low lying and floods regularly so would not be great for a playground. Neighbours on the new site object (to a plan which is unnecessary).	No
154	Yes	7 years without a school is just becoming a joke Just do everything possible to get a school back somewhere in our community	The original site is still the best option but because this has been so political and such a waste of time and money we just need action
155	Yes	The current school site is amazing has alot of history it should be kept as a useable space for Redcliffs families and encourage recreation and life after the quakes and bring the Redcliffs kids back together as they have to do extra curricular activities in sumner, ferrymead,mt pleasant .	

156	No	Because it was a dump and floods a lot . AND you can make the existing school site safer with a big stone wall at back by the cliff .	
157	Yes	Redcliffs school needs to be in redcliffs. Restore our community. All redcliffs needs is a school.	Stop stalling!!!
158	Yes		
159	Yes	Because Redcliffs needs a school sooner rather than later!!	Yes put the Redcliffs Medical Center on old school site
160	Yes	Our daughter Susannah Smith attended Redcliffs School. We know the park and community well	When Susannah was at Redcliffs School they had tsunami drills. Think the plan needs to allow for possible rising waters with Climate change. Like the elevated building concept. It looks good
161	No	Perfectly good school already on site new site has just as many issues ie flooding. Rockfall would only be at back and if you turn school site into a Park ok for children to play?	No
162	Yes	Redcliffs, as a community, needs it's own school situated in its own neighbourhood.	
163	Yes	There should be a school in Redcliffs	Redcliffs school should return to it's original site.
164		I feel this is an excellent location and Redcliffs needs it's school back in the Redcliffs Community.	
165	No	s9(2)(ba)(i)	
166	Yes	I believe that Redcliffs School should be reinstated to its community in Redcliffs as soon as possible. As Redcliffs Park has been identified as the only suitable location, I am keen to see it go ahead.	

167	Yes	The local community needs a local school to thrive and limited spaces available makes a land swap the best option. Temporary inconvenience for a long term community asset	Should have happened 5 years ago!
168	Yes	It's paramount that Redcliffs School returns to Redcliffs. Safe secure education for our local children. Also a hub for the community.	
169	No	Flooding, tsunamis risk Current site of the school is good Leave school where it is Do not take the park	Leave the school where it is
170	Yes	I agree as we just need to get on with it and if the act can speed up the process that is already long over due, use it.	
171	Yes	I agree as it will provide the community with a school locally and still have a park in the community	No
172	No	If it's safe to have a park there why not a school	Not fair on home owners by park. Not what they signed up for
173	No	If the existing site is fine for housing or recreation, then it is fine for a school. Also it makes no sense to site it even closer to the water than it is now	
174	Yes	As a parent of a former pupil, I believe that the local community needs a primary school which is located within the community, and within walking distance of the majority of its pupils. The interactions that this creates is a huge contributor to community spirit and health.	Please proceed with the proposal as soon as possible.
175	No	A. The current site has been certified as safe by a number of reports done by the school. There are currently homes closer to the cliff than the school. B. Redcliffs park has been prone to flooding for years and with sea levels expected to rise in future, I believe this site to be totally inappropriate.	Keep the school on the current site. Fiscally it must make more sense. Historically it belongs there.

176	Yes	It is most important to get the School operating back in Redcliffs where it should be. Hurry up and build it.	I find it absolutely appalling that a whole generation of children has missed out on attending the School in Redcliffs while it has been located in Sumner. The School is a vital part of the Redcliffs community and needs to be rebuilt there ASAP! I do however find it completely ridiculous that the old School grounds have been deemed safe enough to be a public park but not a School. The sooner this proposal is completed the better.
177	No	The school should stay where it is. park land to low	It will flood in winter
178	Yes	Because it brings the school back to the community. I was happy for it to go at the old site or Barnett Park also. I think it'll be great for the park (old school site) to be visable from the main arterial route, both will be a real asset to the community.	
179	Yes	There has been exhaustive investigation into whether or not this should happen, 7yrs on lets just get it done for the good of the community & cement it's future. Park on Main Road will be a visual amenity & a significantly better used resource than hidden away where it was.	As I understand it, the proposal allows for the Classrooms etc. to be primarily on the higher ground, so the concerns raised about the intermittent drainage/ flooding to the existing Redcliffs Park would largely be mitigated, only effecting the proposed School's playing fields, during which times I'd have thought most school's playing fields would be off limits anyway.
180	Yes	The new school will be a critical part of the area and needs to go somewhere. This decision needs to move forward for community resilience	Please go ahead and build the school
181	Yes	I think it's a good idea	N
182	Yes		

183	Yes	Because at least that means there is a school in Redcliffs, although I still don't believe there is a need to move the school from its historic site as it's entirely safe. However, I would rather there be a school in Redcliffs than not at all, and I don't trust that saying "no" will put the school on the original site - it's more likely to just stop progress. So yes, I am on board with the Redcliffs Park site on the grounds that Redcliffs students have their own school in Redcliffs, although there is no difference in safety or student wellbeing between either site.	
184	Yes	Redcliffs needs a local school. As a alumna of Redcliffs School, I feel strongly that the school has always been at the heart of the community. Moving the school to Redcliffs Park is a perfect solution to the problems of the current location. Furthermore, many of the buildings can easily be moved to the new site, minimising the costs of the rebuild.	
185	No	Redcliffs Park is far too close to the sea, even a small tsunami could be disastrous, or even a very high tide. There is no reason why buildings could not be on the road frontage of the old site, and the playing area at the back.	Hekia Parata is gone so there should not be any further hurt pride issues, just go back to the old site and get on with it.
186	Yes	Establishing the school in a timely manner is important for the children and community.	
187	No	I disagree because there is no reason why the school shouldn't just go back to the original site because it has been proven by professionals that it is safe. If it is safe enough to hold the school fair then it should be safe enough to have the school there.	
188	Yes		
189	No		If the old school site is safe for children to use as a Park why go to all the expense to start again on a new low lying site exposed to rising sea levels?

190	Yes	I am an ex student and It needs to stay in Redcliffs for the community	
191	Yes	Redcliffs MUST have a school in the current proposed timeframe. It is a tragedy that the Ministry of Education and the former Minister of Education would not consider the facts that showed the old school site was safe and unlikely to have long term psychological impact on those entering the grounds. Several thousand attended the school fair on site in 2017. The preparation planning for the school to open on the Redcliffs Park site is well underway. To avoid more delays in returning the school to Redcliffs the land swap is the only option even though not the preferred option. The old school site will make an amazing park that hopefully the school can fully utilize for sporting activity. Staff, pupils and parents are being psychologically impacted by the current delays and conflict. If the Ministry of Education, City Council and Government can 'guarantee' that Redcliffs School could open on the old school site 'in the same scheduled time frame' as the Redcliffs Park site that would always be the preferred option.	The Redcliffs School Staff, PTA and Board must be commended for ensuring that Redcliffs children have had and are having a stable, secure learning environment. It is time for personal agendas to be put aside so that full support can be given to this school in its own community.
192	Yes	To bring the school back to the community in Redcliffs	
193	Yes	Redcliffs needs it's school back in the community. Great location for a school. Good access from coastal pathway. All reports have been completed and now it's time to get on with rebuilding it. Please make a timely decision so this school community can have the certainty it desires and begin rebuilding.	
194	Yes	Redcliffs Park has been shown to be a suitable location for a school and we need our school to be back in Redcliffs as soon as possible 7 years already is far too long to wait.	
195	Yes	It will be so great to have a school back in our communittee after so long!	No

196	No	Disagree	The Redcliffs School should stay where it is.
197	Yes	The Redcliffs families and community needs to have its school back in the Redcliffs. They have been waiting long enough.	
198	Yes	I see this as the only way in which Redcliffs School can be returned to the suburb of Redcliffs in a timeframe which won't have a significant detrimental impact on the school morale and viability.	I understand that all potential technical concerns for Redcliffs Park have been addressed.
199	Yes	Redcliffs needs it's primary school to return to the local community. This move benefits the families of Redcliffs and the Bays community as a whole.	
200	Yes	The community needs a school to be back in Redcliffs.	No
201	No	<p>1. Redcliffs needs to retain their Primary school. Without it Redcliffs will become a retirement village with resultant loss of businesses associated with young families.</p> <p>2. The proposed site at Redcliffs Park has been well documented to be in a high flood management area.</p> <p>3. We strongly believe that retaining the school on the current site is the least risk option and the less expensive.</p> <p>4. While Regenerate Christchurch state that a new school on the Redcliffs Park site would be in use for 50 years, this is arguable with forecasted climate change evidence. Further more the old site can be rebuilt on over a more convenient time period.</p>	No
202	Yes		
203	Yes	The school is an integral part of the community and is highly valued. It is a wonderful school and needs a local home. The Govt wanted to move it to the new site so let's get on with it!	I'm just really excited for the school to get the final green light so the school can get back to a permanent local location. Can't wait. :)

204	Yes	I think the Redcliffs Park is a great site for Redcliffs School because it is in the heart of Redcliffs and is accessible to the children by foot, scooter or by bike.	We want our school back in Redcliffs as soon as possible. It has been too long already and we need it back as the heart of the community. We need to do this for the children so they can again walk, bike or scooter to school in their neighbourhood.
205	Yes	Redcliffs needs our school back to reunite the community. The existing site is not viable so Redcliffs park is the sensible option.	Ready to return!
206	Yes	Redcliffs community need a school in their own area. This has been deemed the only available site to rebuild the school.	
207	Yes	The school needs to be back in Redcliffs, if it cannot be on the original site this is the next best option.	
208	Yes	I agree with the use of section 71 as I believe the community desperately needs the schools return. The process to date has been protracted (my year 1 child at Redcliffs has now progressed to high school without returning to his community school site) and this land swap appears the only practical solution to advance. The community has been consulted and spoken on more than one occasion - Now let's make it happen!	
209	Yes	I agree because Redcliffs school is the heart of the community. Our children deserve to be in their community and to walk and bike to school.	
210	Yes	Redcliffs needs a school in its community and it's the best site for it.	
211	Yes	It's a great place for a local school. Redcliffs needs a local school	
212	Yes	The School needs to return to Redcliffs. Redcliffs children need their own school.	Help the community get their school back where it belongs.
213	Yes	Redcliffs needs its school back ASAP. And as the old site is no longer an option, I think Redcliffs Park is perfect. It has taken FAR TOO LONG!	

214	Yes	Because it would be wonderful to walk to school, bike to school, scooter to school. A school at the heart of our little village.	I hope it happens.
215	Yes	Redcliffs needs a school back in its heart. So much preparation has already gone ahead that the proposal just needs to keep moving forward now with the decision for Redcliffs Park	NO
216	Yes	Redcliffs Park will make a great site for a school with its easy access and safe grounds.	
217	Yes	Important to get the school back into the community, the park is an ideal site.	
218	No	There is nothing wrong with the current Redcliffs School site and the school should remain where it stands. There is one Junior classroom (removable) which I considered could be potentially too close to the rear rock face, but other than that the current site poses no dangerous threat to students.	It is so much more cost effective to leave the school on its current site and the intended new site will pose problems in the future should sea levels rise as predicted.
219	Yes	The school needs certainty and a permanent home. This solution was carefully thought through and researched. It now needs to happen.	No
220	Yes	Because Redcliffs needs a school.	
221	No	I am not convinced that the current school site has to be abandoned. I would like the school to remain at its current site with the appropriate rock work done.	
222	Yes	The school has been out of its area too long and needs to return to Redcliffs. If the original school site is not regarded as safe, Redcliffs Park is the best option being close to the original site on Main Rd.	The school community has been staunch in its efforts to return the school to Redcliffs. They deserve our support.
223	Yes	Great school, student demand for a school in the area, the school has gained local and national support, the community has been through enough and have complied with everything asked of them. It's time the Government wrapped its arms	This school community has been through enough. Let's get on with building this new school and restoring confidence in human nature.

		around this school, showed some mana and got on with building this promised school.	
224	Yes	Our community needs a local school and Redcliffs park has been decided on as the most desirable location.	
225	No	Waste of money as relocation serves no purpose. New location has higher risk to people than the existing address.	
226	Yes	Given the options proposed at the time by Minister Parata it is the only solution that is practical and timely.	
227	Yes		
228	Yes	Just makes complete sense - where else would it go.	No
229	Yes		
230	Yes	I have followed this debate for a long time and Redcliffs like no other community when threatened with closure have shown that a school in their community is hugely desirable , incredibly supported and has the ongoing and growing population base to sustain and grow . I believe also that the Redcliffs leadership staff and board of trustees have shown a model of leadership vision and direction that should be used as an example for best practice in other schools	I have rented a home by the park where the school is transferring to and it is not a highly used park in fact the old site becoming a park will have a higher profile and may be used more
231	Yes	Quite simply - it is the right thing to do. We need to follow our hearts.	It has been long enough for this community! Let's do this!
232	Yes	Extensive investigations and submissions support the selection of each site for its new purpose. Students, whānau and staff from Redcliffs School need to move forward and be able to focus on core business.	These people matter... let's move forward.

233	Yes	Great spot for the new school. Redcliffs school has been off its site for 7 years and the time is well overdue for it to return to the heart of its community.	
234	Yes	it's a suitable site for the school and they need to get back to their community	
235	Yes	A good solution for the community	no
236	Yes	It's a great site for the school, let's keep the ball rolling and give the Redcliffs school children some security.	No
237	Yes	We need our school back In Redcliffs, in our community	No, can't wait to get building work underway!
238	Yes	Redcliffs School needs to return to it's community. Schools should be the heart of their community so that they can be used as a hub to serve their learners and their families. The Redcliffs park provides such a place, and the landswap will allow this to happen.	
239	Yes	Redcliffs needs a primary school back in its enrolment zone. They have been away for too long. The experts have looked at all the options and chosen this as the preferred one. Well overdue to make it happen.	
240	Yes	1. Prospective parents & families will be happier with the new site. The new site is visually safer & less worrisome for all concerned. 2. Once in situ & landscaped the school will be visually appealing. The neighbourhood may not imagine the school being visually attractive now but in time the school will blend into the landscape.	No
241	Yes	best solution	
242	Yes	Research has shown that in the present circumstances this is the best choice.	The Redcliffs School community have been a model for public good and deserve a positive certainty.

243	Yes	Makes sense for safety to relocate to this site for future options, quiet away from traffic and less disruptive for the children	
244	Yes	It keeps the school in it's original zone and is the best place for the school to be relocated to. This will keep the community connected and it is a flat safe area for the school to be built.	
245	Yes	Because the school community needs to progress and move forward.	
246	Yes	I agree. Children should be educated near where they live, in walking & biking distance in heavily populated suburbs like Redcliffs especially when the area has a history of a successful school.	Yes, the ground level should be raised, by earth works before the school is built. This will help future proof the school in the event of rising sea levels.
247	Yes	I support the work of the Redcliffs Board and Staff	
248	Yes	There needs to be a school in Redcliffs. If this is the only spot the government will have the school then approval needs to be given	Please move on with this expeditiously so further families do not have to put up with the stress of having there children educated out of the suburb, and the stress of living with the unknown. Enough is enough.
249	Yes	It's time for this community to be able to move on.	
250	Yes	Redcliffs School needs to get back to it's community.	
251	Yes	It is crucial to get Redcliffs school open again and it should be located in its community.	No - best wishes to the school!
252	Yes	Significant planning, development and progress has already been completed to get to this point. For the benefit of the children and the school community things now need to move on with building their new school on the new site, and not go back to the drawing board.	

253	Yes	We need to get the school back into the Redcliffs community as soon as possible. A lot of work has already begun on making this happen.	Even though the school is not going back to its old site thanks to the decision made by Hekia Parata, it will do it's utmost to ensure the new build at Redcliffs Park becomes an asset to the whole community. They will work with nearby residents to ensure their residential rights are respected
254	Yes	Redcliffs School should return to their neighborhood. This is a viable site.	No
255	Yes	I believe it to be the best option not only for the school but for the community as a whole.	none

Released by the Minister for Greater Christchurch Regeneration

256	No	<p>I disagree to the relocation of Redcliffs School to Redcliffs Park because the grounds are too small, too prone to flooding, will be inundated as the sea levels rise through the century, will generate a traffic nightmare in the neighbouring narrow residential streets, and the whole project represents a massive waste in taxpayers and ratepayers money when a perfectly safe, genuinely long-term, and already developed school site already exists in the community, and the relocation would also see the demolition of century old historic school buildings. The Redcliffs Park site is utterly unsuited for school purposes for anything beyond 50 years. It is known that Redcliffs Park is in the high flood risk zone, and faces inundation before the end of this century as a result of climate change. For the land to be used beyond 50 years, and for a "genuine long-term location" the land would have to be heavily engineered, and raised well over a metre. This is also complicated by a pressurised sewerage pipe being laid across the middle of the park from the intersection of Celia and Beachville, to the approximate location of the old water tanks by Main Road. There is not enough space on the land for the school buildings necessary for a school with a roll the size of Redcliffs School. The classrooms, administration, assembly buildings, and staff car parking would consume most of the land on the Redcliffs Park site, leaving no chance of play separation between younger and older students (important to prevent injuries and conflict), and a very small play area and playground facility. The Main Road access-way to the existing school site was problematic in its use pre-earthquake, and the cause of modest traffic jams each morning and afternoon. An access-way on Celia Street or Beachville Road would be a disaster. There is almost no on-street parking in the vicinity of the school that is not taken up during the day by local resident's parking, and the construction of the Estuary</p>	<p>It is a less expensive option to build rock protection on the pre-earthquake boundary and to reinstate the school on its pre-earthquake grounds. It is a truly long-term site that will easily see out another century of education in the suburb on the historic school grounds while the park grounds are eaten away by rising water.</p>
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257	Yes	This site is the best option for the school and Redcliffs will still have a park	

258	Yes	I feel there needs to be a local school back in Redcliffs -one that is at the heart of the community and poses little disruption to neighbouring properties	The footpath along Main road on the Moa Cave side needs to be reinstated. Crossing the road at Mc Cormacks Bay/Main Road is completely dangerous to children/ elderly and many weekend runners /walkers
259	Yes	I'm a Redcliffs parent and I'm sure the school will be made safe. We need our school back and the site is ideal to cope with future growth.	I'm very happy with the proposal.
260	Yes	It's very important that the school be returned to Redcliffs after being in exile in summer since mid 2011. The ministry has been great providing buses but it's time to return.	The former Minister for Education was wrong to stop the school returning to its old site. However this is a great option and it will be fantastic having the kids back in the community. Unfortunately my oldest will miss out but my youngest will get to attend the new school.
261	Yes	School needs to come back to the community.	
262	Yes	The old school site has been deemed unsafe due to rockfall risk and our community needs our school back.	No
263	Yes	Safest place for the new school and a lovely spot for the children to be right near the water in a natural environment	I would never have sent my children to the old Redcliffs school site!!
264	Yes	We have relied now on the goodwill and dedication of the staff at Redcliffs School to provide an outstanding education to the children of Redcliffs for seven years. It is incredible that a school can continue to excel when the staff have faced continual uncertainty around their employment, they have had additional travel time and they have had to work in conditions that are not designed around best teaching practice in the 21st century. If it were not for the goodwill and dedication of these staff the children of Redcliffs School would have had a very different education experience over the last seven years. Lets not take these people for granted one more day than is necessary. We now have a generation of children that have never attended Redcliffs School in	Much has happened in the suburb of Redcliffs as part of the earthquake recovery strategy. The roading improvements, the library the supermarket the housing repairs and rebuilds and the beginnings of the coastal pathway. Redcliffs will however not be the suburb it once was until the school is back in its heart. While we appreciate everything that has been provided for our children over the last seven years we now need to move on and reclaim something so quintessential New Zealand, a school at the centre of our community, both physically, emotionally and spiritually.

		Redcliffs. Lets keep the children at the heart of this decision and lets not forget the amazing staff that have kept the heart of Redcliffs beating.	
265	Yes	The school needs to return to Redcliffs and the land swap makes logical sense and use of the existing land resources.	Lets get on with it.
266	Yes	It would keep the school in the heart of the community and give the kids the chance to walk and bike to school	The sooner the better we get this done. All this time is wearing on staff and the community. People have had enough of this process.Please hurry up!
267	Yes	To return Redcliffs school back to the heart of its community, whilst also retaining a valuable park facility in the village.	
268	No	There is a school already on Main Road (the old school) that is safe and able to be used with minor repairs. The old school site has been sitting unused for several years now since we were aware that the site had been proven safe to a very high level of confidence - especially with the addition of a bund in front of the cliff face. I'm not aware that a solid reason able to stand up to any scrutiny has ever been supplied to support the move?	
269	Yes	Redcliffs needs a school in the community	

270	Yes	The school has been without their own campus for 7 years and the Redcliffs community really needs their school back. This proposal will allow the school to re-establish itself back in their local community with a purpose built campus of exceptional standard to bring a great facility to the area.	No
271	Yes	The current Redcliffs Park is underutilized by the community in my view. Bringing the school there will make the best use of the area, away from the main thoroughfare. The current school site is central and has existing car parking facility, i hope a park will enable our community to gather and our children to enjoy our beautiful natural environment in the heart of the community. A park there is accessible and would be a safe option.	Actions are needed now - enough talking has been done
272	Yes	Redcliffs needs its school back!	
273	Yes	Family attending proposed school	
274	Yes	I agree because it will enable the land to be used as a school so that the school can return to its community. It will also enable the old school site to be reutilised as a park	No
275	Yes	We need a our school returned to Redcliffs community. The current Redcliffs Park site is the best option available at the moment.	
276	Yes	I agree because it will continue the Redcliffs School legacy in Redcliffs community and greater Christchurch. Good for students, good for parents, good for businesses in the area, good for sports clubs in the area, and good for wider community in general.	Keep the process as transparent as possible and let's all work together to achieve this goal.
277	Yes	Keeping Redcliffs school in Redcliffs is an important part of the community, and the redcliffs park site is ideal for the new school. Currently there are safety risks for the children waiting	I'm very happy about it!

		for a bus to transport to the temporary site - these will be removed by having the school again in Redcliffs	
278	Yes	The school is an important thing for the community. There is continued growth in the area. This is the only option for the school. If school closed then too dangerous to get to other schools such as Mt pleasant	Get on with it. Seven years!!!!!!
279	Yes	The school needs to return the community and this is a fair and reasonable location for the school. There are not alot of options for its location and their has been a lot of time and effort put into returning the school to redcliffs. The school has been away from the community for 7 years now and it is time to see them home.	
280	Yes	I am very satisfied that due diligence has been done to ensure that Redcliffs Park is a suitable site for our school. Redcliffs community benefits from having a school and a park in Redcliffs and our school will finally get to return to its beloved community and Redcliffs will feel like a humming community with its school back once again.	Thank you very much for your work on our school.
281	No	I agree only to the extent that the process would otherwise take too long and the Redcliffs community and School need the school to return as soon as possible. It is clear that the happiness and cohesiveness of the local community have been badly damaged by the Ministry of Education's refusal to permit the School to return to its site in Redcliffs in spite of favourable geotechnical reports. I have to fundamentally disagree though, as it is apparent from the document "Draft Redcliffs School Section 71 proposal" that the Minister has not been sufficiently briefed to be in a position to make this	I would request that the Minister for Greater Christchurch Regeneration liaise with the Minister for Education to ensure that the original decision to move the school be properly reviewed, so that this whole process may be rendered unnecessary and the School may be returned as soon as possible to its original site. I write this personally as a local resident, but in my role as secretary of the Redcliffs Residents Association I have taken a keen interest in this matter and heard representations from all sides of the community.

		<p>decision. In Para 1.3 It is stated that extensive analysis has been done "including investigations into the psychosocial effects on children attending the school..." This is actively misleading since the published reports actually supported the return of the school to its original site, with easily achievable mitigation efforts. The claimed extensive analysis did not in fact include any comparison of the benefits and risks of returning to the original site as compared with moving to Redcliffs Park or another site. Both Ecan and Christchurch City Council have concerns about the Park site. Residents have vehemently objected to losing the amenity of the estuary edge park site and there will be obvious adverse effects on traffic flow and the immediate neighbours. The usable area of the original site is the same size as Redcliffs Park, easier and quicker to build on, has better road access and is better from the point of view of coastal inundation risks. It is considered safe enough for a public park and community centre so there are no realistic safety concerns regarding rebuilding the school on its original site, which would be a lot faster than going through the proposed process. The Minister may wish to note that the decision by the Ministry of Education to rebuild on Redcliffs Park against the wishes of the community and the School Board of Trustees and without the support of specialist reports is currently subject to an investigation by the Office of the Ombudsman.</p>	
282	Yes	New school is a good idea	We are thinking of moving to Main Road Redcliffs, and we look after two young granddaughters. The main amenity that might be affected by the school is that there is a public pathway now from Main Road by the playground, across the playing field, to Beachville Road. This would be blocked by the new school which would mean that the new route to Beachville Road would mean a much longer walk along busy roads.

			Could a public pathway be ensured through the school grounds?
283	Yes	Great idea, let's not delay any further.	
284	No	I disagree with the proposed proposal because the Mayor Hon.Dalzell, said on the Radio that the Pacific Park development should never have been built on and asked Sir Bob Parker (Prev.Mayor) for an apology, because this had been a CCC Rubbish site, yet at the same time she urged CCC Councillors to vote to put a school on a Sumner Borough Council and Christchurch City Council rubbish site, near a very dangerous estuary where many people have drowned. it was always CCC Policy not to build on rubbish tip sites and in my view it is just a very stupid idea. Thank you	
285	No	I disagree for the following reasons 1) Road Safety. Main Road at the cutting has limited parking and is extremely busy. There have been many serious accidents in the area, due to the road conditions. parents dropping off and collecting children will cause major issues around the cutting and on the quiet residential streets of Beachville Rd and Celia Street. 2) Water Safety. The Heathcote and Avon River Estuary is adjacent to Redcliff's Park. The Estuary is open to the sea, and has extremely strong currents due to tidal movement and river flooding. A small child that wandered outside the school	1) The proposed land swap has split our small community. 2) Everyone wants to see Redcliffs School relocate back to our community. 3) The best location for Redcliffs School is on its original site 4) Please reject the land swap and request the Ministry of Education to reconsider its decision and locate Redcliffs School back to its original site.

		<p>grounds or walking to and from school, could well be placed in danger.</p> <p>3) Existing 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.</p> <p>4) Flooding. Redcliffs Park is low lying land and has flooded on many occasions. The water table is very close to ground level. If the ground levels were raised, to accommodate a school, then the adjoining properties would be flooded. This land is not suitable for a school.</p> <p>5) Tsunami Threat: Due to the reasons I have already outlined, Redcliffs Park would not be a good location for a school or community civil defence site.</p>	
286	No	<p>I disagree with the proposed plan to locate the Redcliffs School at the Redcliffs Park. I have studied the proposed plan and find that the safety of the school children is at higher risk especially entering through the Main Road entrance. It is placing the children to even higher risk of injury than the Redcliffs School original site. All parents please carefully the safety zone opposite the entrance. I would not let my grandchild attend that school if it was located at the Redcliffs Park. As a child I had witnessed many times the rockfalls from above the Moa Bone cave.</p>	<p>Reduce the number of children at the Redcliffs School and locate it back at the original site with the appropriate safety barriers.</p>

287	No	<p>Our family home will be severely impacted by this change of plan which will affect the livelihood of our whanau. The removal of a substation and old reservoir on this site may damage our home and cause stress. Please consider that you are changing a plan without a final design of the school. Recreational users of the park and estuary will suffer through this loss. You are already aware of the flooding issues and building on reclaimed land may not be in the best interest of taxpayers. I support a school in Redcliffs but not at the expense of the loss of this treasure.</p>	<p>At no stage of this process have I felt that this political decision has been honest. We have attended various meetings to voice our opinions and listen to come away feeling empty and helpless as I think that this is a 'done deal'. This decision has split our community which has already suffered enough from the Earthquakes. Return the kids back to the existing school site.</p>
288	No	<p>I wish to express my opposition to the proposal to move Redcliffs school and Redcliffs park. Redcliffs Park has been a valued seaside community park for over a hundred years and continues to attract new users with the new cycleway As the Board of Trustees of Redcliffs School said in October 2016 submission, "The Board's view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board's view is based on the fact that there are not objective reasons why the school should not return to the Main Road site". Though the Board's view changed following the decision by the then Minister of Education, Hekia Parata to move the school to Redcliffs park, the facts have not:</p>	<p>Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a relocation to any other site. There is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has built in resilience to sea level rise. It is much less at risk from a tsunami, and there is not risk to children from the estuary. The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community. It is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated by a Canterbury earthquake and can hit the short in minutes with no warning. The park is</p>

			<p>right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated and is completely unnecessary. Sea level rise of even a metre - which is absolutely inevitable - would obviously drown Redcliffs Park and mean that the school if relocated, would be perched overlooking not a park but the estuary. The danger of drowning would be even more acute, and there would be no playing fields. Worse, Redcliff's Park would have been taken for no reason. Redcliffs park is used more and more every week. The Coastal Pathway brings cyclists roller skaters, walkers and joggers to the Park in increasing numbers. The Fun Run brings hundreds at once once a year. The ark is used by school sports in weekend and every single day y children playing in the park by families picnicking and by families kicking a ball around. There are far too few green spaces. To take one for a school, beside the ocean, particularly when it is unnecessary is not only wrong, but would be a historic mistake. The Proposal fails to consider the three obvious alternatives: 1 Returning the school to the existing school on the current site. 2 Rebuilding the school on the current site 3 Moving the school to another site such as Barnett Park A review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the Greater Christchurch Regeneration Act 20016 (GCR Act) We therefore request that i) you reject or place on hold the exercise of power under</p>
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			<p>section 1 of the GCT Act, and ii) request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site.</p>
289	No	<p>To whom it may concern,</p> <p>I am appalled at the apparent continuation of plans to re-locate Redcliffs School to Redcliffs Park. I expected and hoped that a change in government would allow a re-assessment of the “disaster recovery” mentality which has seen so many poorly-reasoned decisions made across Christchurch, which have impacted the citizens and squandered millions of dollars of public funds.</p> <p>I understand geotechnical assessments have declared the existing school site safe (after construction of bund walls). The proposed site has flooding and land stability issues, and is also a valued recreation area which exists for the enjoyment of residents. The process of confiscating this site from the residents/ratepayers 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.</p>	

290	No	<p>My submission Re: Redcliffs School and Redcliffs Park relocation: Section 71 Proposal</p> <p>This is a submission on the Proposal to exercise section 71 power: in effect, to relocate Redcliffs School to Redcliffs Park</p> <p>I am writing to express my opposition to the proposal to move Redcliffs School to Redcliffs Park.</p> <p>Section 1.4 of the Proposal states <i>"In March 2015, the Ministry of Education (Ministry) announced an intention to close Redcliffs School. Following consultation on this proposal, the Minister of Education made an interim decision that the Redcliffs School should close."</i> And Section 1.4 says - <i>"Following comprehensive submissions from the Redcliffs School community, the Minister of Education chose not to confirm the decision to close Redcliffs School, but to undertake further analysis. Following extensive analysis, including investigations into the psychosocial effects on children attending the school, the Minister of Education announced on 1 November 2016 that Redcliffs School should be reopened but relocated to the nearby Redcliffs Park."</i></p> <p>☐ I recall thinking at the time that the Minister, Hekia Pirata, was saving face with her change of decision to close the school, that she would not back down but get her own way by saying it would remain open but be moved to a different location. Engineering reports saying the current school site is safe from rockfall were not acknowledged; local community opinion was not acknowledged; and current school site was not included in the assessment of suitable sites for the school. – this was hardly an open, complete and transparent process – the MOE therefore need to do a thorough assessment.</p> <p>☐ The Proposal should have, under section 65(1)(d), included <i>"(d) an explanation of why the proponent considers the exercise of the power is necessary and preferable to any alternatives to the exercise of the power;"</i>.</p>	
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		<p>The Proposal failed to consider the two obvious alternatives: Rebuilding the school on the current site; and Moving the school to another site such as Barnett Park. This failure is so egregious that the Proposal should be withdrawn and resubmitted.</p> <p>Under the Greater Christchurch Regeneration Act 2016, one of the purposes is stated in section 3(1) (c) as “(c) <i>enabling community input into decisions on the exercise of powers under section 71 and the development of Regeneration Plans:</i>” – you will know what this means as defined by the act.</p> <p>☐ The changing of the Redcliffs Park to a school does not enhance or improve 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 – therefore not an enhancement.</p> <p>☐ The quality of the school grounds if at Redcliffs Park would be greatly reduced as the Park floods in winter, and sporting games (there are currently 2 football fields based</p> <p>At the park) are cancelled due to the wet conditions on the park. This would not be an improvement for the school community. The City Council acknowledges this in their attachment also stating the park flooding is part of the flood mitigations for surrounding residential properties.</p> <p>☐ The risks associated with the nearby estuary would also pose an increased risk for pupils and an undue level of concern for the school staff while caring for students – not enhancing the community safety.</p>	
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		<p>☒ Shifting a school further away from the Redcliff communities 'centre' will NOT enhance the local community but make the local school less accessible, more difficult and unsafe for children to access.</p> <p>☒ The value of surrounding homes may also be negatively affected by this change of use and I have seen no discussion on this aspect – this surely cannot enhance the community.</p> <p>Section 4.4 of the Proposal states <i>“As set out in Section 5 of this proposal, using section 71 of the GCR Act to make these amendments to the District Plan allows for a significantly more expedited process than the alternative processes available under the Resource Management Act 1991. It is considered that the re-establishment of the school and community park in an expedited manner is both necessary for the social and emotional wellbeing of the community and preferable to the additional delays the use of other processes would create.”</i></p> <p>☒ 'expedited' actions are rushed through without proper consultation and result in poor decision making which communities then have to live with. The proper consultation had not been done by the MOE in the first instance. Following a more thorough, transparent and honest assessment of the Redcliff school site would ensure the correct decision is made for the longer term and futureproofing of the school. – a process the Ministry has not entered into in good faith or with open transparency to date and this stage has the opportunity to take stock and ensure that a PROPER PROCESS is completed by the MOE before it is too late.</p> <p>As noted above: The Proposal failed to consider the two obvious alternatives: Rebuilding the school on the current site; and Moving the school to another site such as Barnett Park. This failure is so egregious that the Proposal should be withdrawn and resubmitted.</p>	
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		<p>☐ I also note the MOE has stated the proposed school on the Redcliffs Park would be fit for purpose for 50years – the current school site has been fit for purpose for over 100 years so far and so a 50 year aim is rather short sighted than future proofed.</p> <p>☐ It has also been noted by the Christchurch City Council that Redcliffs Park as a flood risk area and tsunami risk area and that the Christchurch City Council had made a decision not do new builds on these areas – their decision to go against this will set a precedence. And again the CCC should have requested a more thorough assessment be done by the MOE to assess as noted above: to consider the two obvious alternatives:</p> <p>Rebuilding the school on the current site; and Moving the school to another site such as Barnett Park.</p> <p>☐ The current school site can also be utilised quickly with minimal repairs and minimal cost – the MOE’s original estimate for repairs was \$7million over what the school BOT estimated in 2016. This huge variable in an estimate in itself also shows the MOE process has been dubious.</p> <p>Ministry of Education actions, processes and decision making has been highly questionable. Even though there has been a change of Government the employees at the Ministry are the same and continue to push out the same ideas – for some they would rather save face and continue along the path they have chosen rather than go back on previous decision even though they are highly flawed. It has also been observed that the local MOE representative does not believe there is a climate change issue and therefore that land is at risk of flooding (quite contrary to much of the Government and Council conversations, planning and decision making.</p> <p>Flawed decision & process:</p>	
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	<p>☐ The MOE has refused to give any cogent reason for abandoning the current school site. Section 71 prevents a proper hearing on this matter. Section 71 must not be used when there is a valid alternative to the proposed land swap. In fact, the School Board of Trustees were gagged when they were threatened with no school or school on different site.</p> <p>☐ Engineering reports have stated that the current school site is not at risk from rockfall and I see that in the Appendix 2 Concise Statement of Views “Council’s geotechnical review identified that <i>there is potential rockfall hazard</i> 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.”</p> <p>☐ The current Redcliffs Park site is well known for flooding - More accurate is paragraph 4.7: “<i>Technical analysis indicates that the lower land levels of the proposed school site are identified as being subject to natural hazard risks comprising: flooding, liquefaction and tsunami.</i>” The assessment of inundation in paragraph 4.8 is misleading. It is based on assessments of sea level rise, and scientific knowledge of sea level rise is far from complete. The site is subject to inundation and that will be exacerbated by sea level rise. While the school buildings may be situated above the rising sea levels due to engineering, that ignores the fact that the school itself would be built on a site subject to inundation, and will have been moved from a much higher site to a lesser quality site for a school and will also mean it is not future proofed. These facts are obscured in the Proposal.</p> <p>Final Notes There are so many things through this whole process since the Earthquakes in 2011 that have been followed poorly and there has been a great lack of community consultation so far by the MOE.</p>	
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		<p>However, their lack and inability to properly assess & compare current and alternative sites is reprehensible and has caused unnecessary delay for the local community. But this should not mean that the process to quickly establish a school on a new site at Redcliffs Park should be pushed through quickly now. What should happen now is a sensible decision to stop the changes, send the Proposal back to the MOE instructing them to fully & openly assess ALL options before inflicting the local community with a school site that is a poor choice, chosen through a dubious process.</p> <p>These changes in the Proposal would result in the community losing its coastal park which would un-enhance community facilities and build a school and a poorer quality site than it currently is sited.</p> <p>I find it unbelievable that we are at this stage of looking at exercising section 71 when the process to get here is highly questionable due to the Ministry of Education. However, we are here and I can only hope that common sense will prevail, at last and a request for proper due process and assessment will be made rather than granting section 71 to be utilised.</p> <p>I request that i) you reject or place on hold the exercise of power under section 71, and</p> <p>ii) Request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site.</p> <p>Key Points</p> <p>Loss of Redcliffs Park from its current site will be a loss to the local community and not an enhancement.</p> <p>MOE assessment process flawed & incomplete - a full comparison of current site and Barnett Park was not included.</p> <p>Redcliffs Park site is lower quality site for a school than current school site or the alternative of Barnett Park.</p>	
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		<p>Redcliffs Park current site would not be an enhancement of school environment (an estuary view is not vital for educational establishment).</p> <p>CCC had made policy not to allow new building on flood risk areas and therefore this should not be revoked in this case</p>	
291	No	<p>I write to express my opposition to the proposal and hope that after your consideration of all relevant information that you will not grant consent. It aggrieves me that I, my wife and other likeminded people should find themselves in this situation and having to voice opposition after a poor political decision by the former Min of Ed Hekia Perata. Everyone I know in the local community and those from outside who are informed say "how dumb", "how stupid;", "how ridiculous" etc. When I say everyone I include some school pupil parents who would have been happy to go back to the existing school site if they had been given the opportunity. I do not believe Redcliffs Park should be rezoned for obvious reasons: The flawed comparative point scoring exercise of possible school locations. Flawed from concept because the existing Main Rd site was excluded. Redcliffs Park is not suitable for a school because: 1. There is a very limited area for buildings on a higher terrace which is sandwiched between the Main Rd/rock cliff face and lower lying flood prone hazard area of the main park. Buildings I understand will need to be cantilevered out over the terrace edge/lower ground. 2. The main area of the Park has been identified as flood prone and subject to coastal inundation/sea level rise issues. 3 It seems certain that a new school here would create a total bottle neck for traffic at the best of times, in the worst of times egg a tsunami there would be a very limited option of escape with rock cliffs immediately to the South, flooded estuary and causeway road immediately to the west, flooded estuary and school fields</p>	

		<p>immediately to the north. The only escape route would be back down the Main rd towards Redcliffs Village and the original school site. One can only imagine the chaos and grid locked road in a situation such as this. The original school site offers better safer options with more space and a larger area of land at the higher level. I have many other reasons for opposing the school on Redcliff's park but acknowledge that they are not relevant to your consideration of rezoning the land.</p>	
292		<p>3 April 2018 Greater Christchurch Group Department of the Prime Minister and Cabinet Private Bag 4999 Christchurch 8140 By email: info.gcg@dpmc.govt.nz Dear Greater Christchurch Group</p> <p>Canterbury Regional Council's submission of views on the Proposal for Redcliffs School and Redcliffs Park</p> <ol style="list-style-type: none"> 1. Canterbury Regional Council (CRC) appreciates the opportunity to comment on the Proposal to exercise the power under Section 71 of the Greater Christchurch Regeneration Act to designate Redcliffs Park for education purposes and for the existing Redcliffs School site to be rezoned as open space. 2. Our submission of views on the Proposal is provided for further consideration by the Minister when making the decision whether to approve the Proposal. 3. These views reflect our statutory responsibility under the Resource Management Act (RMA) to administer the Canterbury Regional Policy Statement (CRPS). The purpose of the CRPS is to set out objectives, policies and methods that achieve integrated management of natural and physical resources in the region, and help improve the quality of life for residents both now and in the future. 	Submission previously submitted

	<p>4. CRC provided feedback to Regenerate Christchurch on the draft Proposal as a strategic partner in November 2017. Key issues raised in this feedback related to natural hazards (particularly flooding and coastal hazards), contaminated land and transport (see Attachment A).</p> <p>5. The submission of views outlined in this letter reiterates CRC's key concern with the Proposal in relation to inconsistencies with the CRPS, specifically in regard to avoiding inappropriate land use and development in high hazard areas. We also comment on the proposed designation condition for a school travel plan.</p> <p>6. CRC recognises the importance of Redcliffs School for the regeneration of the Redcliffs community, and the urgent need for a new school to be established.</p> <p>However, we also emphasise the need for decision makers on this Proposal to have particular regard to relevant policies of the CRPS and the potential for long term adverse effects if natural hazard risks are not suitably taken into account.</p> <p><i>Risks from natural and coastal hazards</i></p> <p>7. The main interest for CRC in relation to the Proposal is whether the risks from natural hazards at the Redcliffs Park site have been adequately considered and addressed to ensure the safety and wellbeing of future occupants of the site, namely children, parents, staff and visitors of the new school.</p> <p>Page 2 of 3</p> <p>8. The CRPS sets out a policy framework that seeks to ensure that new subdivision, use or development does not increase the risk of natural hazards to people, property and infrastructure.</p> <p>9. This approach is consistent with Policy 25 of the New Zealand Coastal Policy Statement, which directs that in areas that will potentially be affected by coastal hazards over at least the next 100 years, an increase in the risk of social, environmental and economic harm from coastal hazards should be avoided.</p>	
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	<p>10. In this regard, Policy 11.3.1 of the CRPS seeks to “avoid new subdivision, use and development (except as provided for in Policy 11.3.4) of land in high hazard areas”, unless the subdivision, use or development meets a range of exceptions.</p> <p>11. CRC considers that the proposed designation of the Redcliffs Park site for a new school does not meet the required exceptions under Policy 11.3.1, in particular exception (3) due to the site likely to require new or upgraded hazard mitigation works to mitigate or avoid the natural hazard risk from flooding and coastal inundation. As stated in the Planning and Regeneration (PAR) Analysis prepared by Regenerate Christchurch:</p> <p><i>“...the lower level land of the site will begin to see issues emerging beyond the 30-year time horizon which are most likely to start requiring mitigation... New or upgraded hazard mitigation would be required to prevent that land from becoming permanently inundated within the 70-100 year timeframe.”</i></p> <p>12. Regenerate Christchurch acknowledges that the Proposal does not suitably meet this exception, stating in the PAR Analysis that:</p> <p><i>“...the proposed development of a school at the site will be inconsistent with certain aspects of the policy framework expressed in relevant RMA documents. Namely that the lower tier of the site will, over a longer-term time horizon and without mitigation, change in nature to become a tidal salt marsh.”</i></p> <p>13. The PAR Analysis also indicates agreement amongst experts that over the 30-70 year time horizon “there is increasing uncertainty... as to the nature of the natural hazard events, and their associated effects” and that “further work would be required to address that uncertainty.” This ambiguity around the materiality and impact of flooding and coastal inundation on the Redcliffs Park site during this period, as well as the related requirements for mitigation, should be more clearly reflected in the Proposal.</p> <p>14. The changing nature of the site from increased flooding and coastal inundation, and surface water ponding (resulting from sea</p>	
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	<p>level rise and related increases in groundwater level), will increase the potential risks and decrease the operability of a school at the site if hazard mitigation works are not appropriately implemented and managed.</p> <p>15. The effects of coastal inundation and erosion will also likely impact the form and operation of Beachville Road, which is proposed to be the main road providing access to the new school. This is likely to escalate potential risks at the site, with the proposed pick-up and drop-off area for the school located on this road.</p> <p>16. CRC is also concerned about the potential for new buildings to be located within the High Flood Hazard Management Area.</p> <p>Page 3 of 3</p> <p>17. The PAR Analysis notes that buildings that may extend into the <i>“lower tier of the site would be protected from storm inundation for at least the next 50 years if built to the minimum floor level specified in the District Plan.”</i> However, there is the potential beyond the 50 year time horizon that sea level rise will result in water levels being close to these floor level elevations.</p> <p>18. CRC considers that buildings that extend into the lower level of the site will be at greater risk to damage or loss resulting from natural hazard events, and reiterates that any new buildings at the proposed Redcliffs School site should be contained on the elevated land on the western side of the site and not intrude into the High Flood Hazard Management Area.</p> <p><i>Encouraging alternative modes of travel</i></p> <p>19. CRC supports the inclusion of a proposed designation condition that requires a travel plan to be developed prior to the opening of the new school that promotes public and active (walking and cycling) modes of travel, and the related reduction in the dependence on private motor vehicles.</p> <p><i>Concluding remarks</i></p>	
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		<p>20. CRC is of the view that the Proposal does not meet the required exceptions under Policy 11.3.1 of the CRPS due to the site likely to require new or upgraded hazard mitigation works in the future to mitigate or avoid natural hazard risks.</p> <p>21. CRC acknowledges that the Minister's final decision on the Proposal may not be constrained by provisions in any RMA documents, including the CRPS.</p> <p>22. However, CRC is mindful of the fact that the Royal Commission of Inquiry into the Canterbury Earthquakes was critical of CRC for failing to adequately advise Christchurch City Council about the unsuitability of land at Bexley for the then proposed residential development. The issue concerned natural hazards and in particular liquefaction.</p> <p>23. CRC does not want such criticism to be repeated, so we strongly encourage the Minister to give considerable weight to the advice given concerning the relevant provisions in the CRPS in the context of the management of the coastal hazard risks associated with the Redcliffs Park site.</p> <p>24. As noted above, these policies provide for the management of future development and land use activities in order to support sustainable development of natural and physical resources, and the wellbeing of both current and future generations.</p> <p>25. CRC staff are happy to discuss the content of this submission of views in further detail if necessary.</p> <p>Yours sincerely,</p>	
293	No	<p>I oppose the land swap to give the Ministry of education licence to build a new school in Redcliffs for these reasons. 1. The land is flood prone 2. The land is in the Tsunami red zone 3. The land is reclaimed land (who knows what lies underneath) 4 Our park is extensively used by all residents be they children or elderly and while the old school site maybe used for this purpose it is just not logical 5 Children's soccer is played there on a weekly basis (both training and competition) 6 It is safe for children and mothers due</p>	<p>As an area for a school it is a preposterous idea. 1 the high volume of traffic on Main road at its narrowest section is a major hazard not to mention an added complication for commuters. 2 I have already mentioned the inclusion in the Tsunami zone. 3 It faces, on Main Road, a rockfall site above the Moa cave 4. The site is very cramped (which will mean building onto the park itself) 5. The</p>

		to the very low traffic volume. 7 The land swap is/was only a ploy to circumvent opposition to the building of a new school.	proposed school site will be on archeologically significant ground which I'm sure will require further investigation (and if the investigation of our house site was anything to go by the bill could reach into the million dollar bracket) 6 I also object to the Ministry of Education spending a significantly large number of millions (taxpayer's money) on going ahead with such an ill-considered project when the existing school could be recommissioned for considerably less. 7. It seems as though the Ministry of Education is pig-headedly continuing on with this idea in spite of recommendations from their own experts and continuing to spend taxpayer's money all along. 8 Not to mention the additional costs the city must bear to change all the roading and the aggravation to all the residents in the area. I would like to state for any official record that we fully support the retaining of Redcliffs school at its' present site or even at Barnet Park. We oppose the effrontery of the Ministry of fruitless spending of our tax dollars.
294	Yes	The obvious and most practical option is to remain on the existing site of Redcliffs school and rebuild appropriately. However seeing this will not happen, if the only option left for a school is using Redcliffs Park then do it.	

295	No	<p>a) The park is flood prone and a Tsunami risk. B) Move the existing school buildings on the main road site forward to the road, use the rear for playing fields. Much cheaper option c) there are occupied houses under the cliff which have not been red-zoned i.e. no danger from cliffs</p>	
296		<p>SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON REDCLIFFS SCHOOL AND REDCLIFFS PARK: PROPOSAL TO UTILISE OF THE GREATER CHRISTCHURCH REGENERATION ACT</p> <p>Thank you for the opportunity to make a submission on the Section 71 Proposal for Redcliffs School and Redcliffs Park. We wish to be placed on your notification list for future proposals under the Greater Christchurch Regeneration Act 2016.</p> <ol style="list-style-type: none"> 1. Heritage New Zealand Pouhere Taonga is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. 2. The specific parts of the proposal that Heritage New Zealand's submission relates to are: <ul style="list-style-type: none"> ● 1.6a The cancellation of the vesting (in the Council) of the Crown owned land classified as Recreation Reserve at Redcliffs Park and this land being set aside as a school; and 	

		<p>● 1.6b The appointment of the Council by the Crown to control and manage the Crown owned land at Redcliffs School as Recreation Reserve under Section 28 of the Reserves Act 1977 for a new park.</p> <p>3. Heritage New Zealand's submission is as follows:</p> <p>Redcliffs/Te Rae Kura is a known area of cultural significance related to Māori occupation and activity. The following account of Redcliffs has been compiled by Christchurch City Libraries:</p> <p>Te Rae Kura has been home to many people for up to 1100 years.</p> <p>The Māori name for Redcliffs is Te Rae Kura meaning red, glowing headlands.</p> <p>Large groups of Māori settled here during the 14th century. A kāika was located at Te Rae Kura that was occupied by the early Waitaha people and then, later, by the Ngāti Māmoe tribe. Ngāi Tahu displaced Ngāti Māmoe in the 17th century and were still living in the area when the first Europeans began to arrive.</p>	
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		<p>The point at the Redcliffs Cutting is named Te Pou o te Tutemaro, in honour of an early Māori explorer.¹</p> <p>5. The NZ Archaeological Association Site Recording Scheme (ArchSite) records a high number of archaeological sites in Redcliffs, particularly associated with Māori occupation and activity. The former site of Redcliffs School is situated within the extent of a Māori occupation site regarded as 'one of the earliest and best-known Moa hunter sites in New Zealand'.² The site covers an area of approximately 1-2 hectares and is considered to be internationally significant for its rarity and information potential.</p> <p>6. There are also a number of recorded archaeological sites in close proximity to Redcliffs Park and there is potential for unrecorded archaeological to be present on the subject land area.</p> <p>7. There are known significant Māori values associated with this area of Redcliffs including a number of recorded archaeological sites. However, Heritage New</p>	
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		<p>Zealand's submission is not an assessment of Māori heritage values. Heritage New Zealand notes that feedback has been received from Te Rūnanga o Ngāi Tahu on the draft proposal for this land exchange and we encourage ongoing consultation with manawhenua.</p> <p>8. Heritage New Zealand seeks the following:</p> <p>As there are recorded archaeological sites on, or in the vicinity of, the subject properties current and future owners are advised to contact Heritage New Zealand's Area Archaeologist (ArchaeologistCW1@heritage.org.nz) to discuss the future management of these sites. Work affecting archaeological sites is subject to a consenting process under the Heritage New Zealand Pouhere Taonga Act 2014. If any activity, such as earthworks, fencing or landscaping, may damage or destroy any archaeological site(s), an authority (consent) from Heritage New Zealand must be obtained for the work prior to commencement. It is an offence to modify, damage or destroy a site for any purpose without an authority. The Heritage New Zealand Pouhere Taonga Act 2014 contains penalties for unauthorised site damage.</p> <p>The change in management and use of the land formerly associated with Redcliffs School, in particular, may present</p>	
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		<p>the opportunity to tell the stories of Māori occupation and activity in this area, in consultation with manawhenua. Heritage New Zealand is available to advise or assist on this suggestion.</p>	
297	No	<p>To: Department of Prime Minister & Cabinet (DPMC) website. Re: Redcliffs School and Redcliffs Park</p> <p>(This submission was posted via a Survey Monkey survey, but as no feedback was provided that the submission had been received, it is included here with an added introduction and further information).</p> <p>While a submissions regarding the land swap were said to be 80% in favour of the swap, this proportion was reached by a management of the poll by the school board, with individual submissions from a majority of the 190 pupils and with parents and board of trustees members urged to individually submit in favour of the swap; this was because the Ministry of Education had persuaded the board that it was a choice between a school on Redcliffs Park or no school at all. Thus the process was heavily slanted.</p> <p>With a new Government and new Minister of Education, the option for returning to the existing site can and must be reviewed.</p> <p>Redcliffs School should return to the existing safe school on its existing safe site. The Mistry of Education has refused to give any cogent reason for abandoning the site. Section 71 prevents a proper hearing on this matter. Section 71 must not be used when there is a valid alternative to the proposed land swap.</p> <p>Redcliffs Park is an excellent, much used public waterfront park. It is, however, flood prone (flooded twice in 2017), and is unsuitable as a school site. The Ministry of Education publicly consulted no-</p>	

		<p>one about taking the park. Analysis of the options for a school site in Redcliffs make it the least suitable site of the three available. The existing school site is far away the best site, according to the Ministry's own site analysis tool.</p> <p>Furthermore, the existing site has a very attractive 10 room school already on it, which can be refurbished and re-occupied at a fraction of the cost and time required for a new school to be built on an unsuitable alternative site.</p> <p>The existing school continued to be operated for several months after the February 2011 earthquake - only fear precipitated the move to Sumner. Geotechnical studies subsequently established that this fear was unsubstantiated.</p>	
298	Yes	<p>Let's get this done as quickly as possible for the sake of the children. No point in wasting time and money on red tape and bureaucracy</p>	
299		<p>This is a community input under section 71 of the Greater Christchurch Regeneration Act 2016 on the Proposal to exercise the power under section 71 of the Greater Christchurch Regeneration Act (GCR Act) to designate Redcliffs Park for education purposes and for the existing Redcliffs School site to be rezoned as Open Space. The proposal is strongly opposed by Friends of Redcliffs Park, Inc.</p> <p>Friends of Redcliffs Park, Inc. (FORP) exists to protect and preserve Redcliffs Park and its amenities.</p> <p>Scope of Consultation</p>	<p>PDF presentation and Report also presented</p>

	<p>We challenge the advice given in section 5.9 of the Proposal to exercise the power under section 71 of the Greater Christchurch Regeneration Act (to designate Redcliffs Park for education purposes and for the existing Redcliffs School site to be rezoned as Open Space), that the policy decision to relocate the school has been made, and the relocation of Redcliffs School and establishment of a community park in Redcliffs involves a discrete scope...”</p> <p>The proposal is as stated by the title: “Proposal to exercise the power ... to designate Redcliffs Park for education purposes and for the existing Redcliffs School site to be rezoned as Open Space” Obviously the appropriateness of the designation of Redcliffs Park for education purposes is within the scope of the consultation. Any RMA process would consider the substantive basis of the decision. Any section 71 process must do so as well. Section 65(2) of the GCR Act states that the draft proposal must contain the: “(a) an explanation of what the exercise of the power is intended to achieve”. Clearly the object of the exercise of the power is not only an issue, but the main issue, under consideration.</p> <p>We maintain that the policy decision itself is flawed and is based upon inadequately and misleadingly prepared and presented recommendations by the Ministry of Education, without any consultation with the school or its community. The decision is fundamentally flawed and patently without basis.</p> <p>There is a second major flaw in the Proposal. The Proposal should have, under section 65(2), included “(d) an explanation of why the proponent considers the exercise of the power is necessary and preferable to any alternatives to the exercise of the power”. Inexplicably the Proposal failed to consider the three obvious alternatives:</p> <ol style="list-style-type: none"> 1. Returning the school to the existing school on the current site, and 	
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	<p>2. Rebuilding the school on the current site; and 3. Moving the school to another site such as Barnett Park.</p> <p>This failure is so egregious that the Proposal should be withdrawn, reconsidered and subject to that consultation, resubmitted. We further believe that a review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the GCR Act.</p> <p>For this reason, we consider that the Proposal is flawed on its face and should be withdrawn and re-issued if the move is pursued (see below). Otherwise members of the public will have been wrongly dissuaded from commenting and the purposes of the GCR Act will not have been achieved.</p> <p>We further believe that a proper and independent review of the recommendation, its background, and the policy decision, will result in a reversal of the policy and a new recommendation to retain the existing school. Frankly, the current policy decision is utterly indefensible. It was without a basis in fact when it was made and it remains without a basis. The “psychosocial effects” on schoolchildren is without basis and is ludicrous. No children who were students during the earthquake will be students in the reopened school. They will be in high school or beyond.</p> <p>With a review of the policy decision (and the concomitant decision to retain the existing school and site) as one of the alternatives for consideration, then the exercising of the section 71 designation becomes pointless, and should be rejected.</p> <p>The Friends of Redcliffs Park have a large number of reports and assessments available to assist in your decision making process, all of which we would be happy to make available to you. The two key documents which summarise the case are firstly the letter of</p>	
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		<p>rebuttal (attached below) sent by the Redcliffs School Board of Trustees to the Ministry of Education on 10 October 2016. In this letter the Board lays bare the inadequate nature of the reasons for abandoning the existing school site, and exposes the exaggeration (by about \$7M) of estimated costs to repair the existing 10 room school, intended to make it a less attractive option compared to a new school elsewhere.</p> <p>The second document is a presentation by the Friends of Redcliffs Park to the Linwood Central Heathcote Community Board in August 2017 (attached below), summarising the reason for retaining the existing school and noting that the Ministry's own site rating tool places the existing site far and away ahead of the other two sites identified in Redcliffs.</p> <p>We therefore request that i) you reject or place on hold the exercise of power under section 71, and</p> <p>ii) Request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site. Retention of the school on its current site will enable a much quicker and much more economical solution to the issue.</p> <p>Yours sincerely,</p>	
300	No	<p>Re: Redcliffs School and Redcliffs Park relocation: Section 71 Proposal</p> <p>This is a submission on the Proposal to exercise a section 71 power: to relocate Redcliffs School to Redcliffs Park.</p> <p>Scope and Objective of Consultation</p>	

	<p>Firstly, the scope of the Proposal is incorrectly stated in paragraph 5.9 when it states that</p> <p><i>“The policy decision to relocate the school has been made, and the relocation of Redcliffs School and establishment of a community park in Redcliffs involves a discrete scope – with the physical scope limited to Redcliffs Park and the current Redcliffs School site; and the scope of documents limited solely to the District Plan.”</i></p> <p>In fact, the proposal is as stated by the title: <i>“Proposal to exercise the power ... to designate Redcliffs Park for education purposes and for the existing Redcliffs School site to be rezoned as Open Space”</i>. Obviously, the appropriateness of the designation of Redcliffs Park for education purposes is within the scope of the consultation. Any RMA process would consider the substantive basis of the decision. Any section 71 process must do so as well. Section 65(2) of the Greater Christchurch Regeneration Act 2016 (GCR Act) states that the draft proposal must contain: <i>“(a) an explanation of what the exercise of the power is intended to achieve”</i>. Clearly the object of the exercise of the power is not only an issue, but the main issue, under consideration.</p> <p>This is important because the policy decision itself is flawed and is based upon inadequately and misleadingly prepared and presented recommendations by the Ministry of Education, without any consultation with the school or its community. The decision is fundamentally flawed and patently without basis.</p> <p>The current Minister, Dr Megan Woods, appreciates the importance of broad community engagement, creativity and vigilance. She said during the third reading of the Bill:</p> <p><i>“What we have got now is a very useful structure for how we can take our city and our region forward, but what it requires now is an operationalisation. As I have been saying, to many of the grassroots organisations in Christchurch: “Your job is not done. Your job is not complete here.”</i> We have a good piece of legislation,</p>	
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		<p>but we still need community involvement more than ever. We still need that level of engagement, we still need that level of creativity, and we still need the level of vigilance that we have seen from the community in Christchurch over its future for the next 5 years as we enter this new phase of our regeneration. That is something that the Labour Party will commit to doing for the next year and a bit that it is in Opposition. It will continue to be vigilant in holding the Government to account, but these are structures that can work if we all work together and work for the betterment of our city.”³</p> <p>So for this reason alone, the Proposal should be withdrawn and properly framed as a proposal to move the school to the Park, which is what it is. Better yet, the Minister of Education should be asked to re-assess the proposal, which is, as will be seen below, seriously flawed from its genesis and which continues to be seriously flawed. The metaphor of a slow train crash comes to mind. There is still time to turn the train around.</p> <p>The Proposal⁴ states misleadingly (paragraph 2.2) that “[t]he objective of this proposal is to support the regeneration of greater Christchurch through retaining both the primary school and a park within the Redcliffs community.” (Emphasis added).</p> <p>In fact, the objective is to move the primary school to the park: it is moving the school to the park, and the park to the school. It is not retaining either. The Proposal goes on to state that “Specifically, the exercise of power will expedite the change of use on these two sites such that the regeneration of the Redcliffs community is enabled.” That is not correct either.</p> <p>Under the GCR Greater Christchurch Regeneration Act 2016 Act, one of the purposes is stated in section 3(1) (c) as “(c) enabling community input into decisions on the exercise of powers under section 71 and the development of Regeneration Plans.</p>	
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		<p>” ‘Regeneration’ is defined by section 3(2) (b) to mean</p> <p><i>Improving the environmental, economic, social, and cultural well-being, and the resilience, of communities through— (i) urban renewal and development: (ii) restoration and enhancement (including residual recovery activity)”</i></p> <p>And</p> <p><i>“Urban renewal means the revitalisation or improvement of an urban area, and includes—</i></p> <p><i>(a) rebuilding:</i></p> <p><i>(b) the provision and enhancement of community facilities and public open space.”</i></p> <p>This is important for two reasons: the current proposal to relocate Redcliffs school to Redcliffs Park would mean not the provision and enhancement of community facilities and public open space, but the opposite: the conversion of community facilities (being the playground and the park) and public open space for use by the school. As such the relocation proposal is contrary to the purpose of the Act.</p> <p>So it is not correct that <i>“the regeneration of the Redcliffs community is enabled”</i>. Instead, community facilities and the open space would be irreparably damaged by this proposal. Regeneration can take place, far more simply, cheaply and safely, by returning the school to its original location, without further delay.</p> <p>This inaccurate reframing of the proposal is continued in paragraph 2.3 which states that <i>“The exercise of powers under section 71 will ensure that the Redcliffs community is once again served by a</i></p>	
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	<p>local school together with providing for the recreation needs of the community.”</p> <p>The recreational needs of the community are in no way provided for: they are irreparably damaged by taking over a valued waterfront park and putting a school in its place: a school that not only does not need to be on the waterfront, but should not be, due to inundation, sea level rise, danger to children from the ocean and tsunami risk.</p> <p>Paragraph 2.3 goes on to state that “[t]echnical analyses support the change in use of the two sites and confirm that a new school site can be safely located on the Redcliffs Park site.” That is not correct either. The analyses do not confirm that it is safe from a locally generated tsunami, do not confirm that it is safe from inundation, do not confirm that it is safe from sea level rise and do not confirm that children will be safe from drowning in the fast current immediately beside the current park.</p> <p>The error is repeated in paragraph 4.2 by stating that “[t]he exercise of power will facilitate the timely rebuilding of the Redcliffs School in a safe location”. For the reasons stated above, the location is not safe for a school. Nor is it appropriate.</p> <p>More accurate is paragraph 4.7: “Technical analysis indicates that the lower land levels of the proposed school site are identified as being subject to natural hazard risks comprising: flooding, liquefaction and tsunami.”</p> <p>The assessment of inundation in paragraph 4.8 is misleading. It is based on assessments of sea level rise, and scientific knowledge of sea level rise is far from complete. What we do know is that the site is subject to inundation and that will be exacerbated by sea level rise. While the school buildings may be situated above the rising sea levels due to engineering, that ignores the fact that the school itself would be built on a site subject to inundation, and will have been moved from a much higher site. These facts are</p>	
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	<p>obscured in the Proposal. More accurate is the expression by the Christchurch City Council in the Concise Statement of Views: <i>“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. 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.”</i> [Emphasis added]</p> <p>And by the Canterbury Regional Council in the same document: <i>“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. 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. 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.”</i></p> <p>As the CCC stated, the proposal should address why it is being proposed in such an area. T does not.</p> <p>The tsunami risk is mis-stated. Paragraph 4.12 states that <i>“[a]s with the surrounding areas, tsunami risk affects the site. However, as with the general area it is expected that there will be considerable warning time for a distant source tsunami such that risk to life is appropriately managed.”</i></p>	
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	<p>Anybody familiar with the October 2016 Kaikoura earthquake will be aware that it generated a tsunami, and that no timely warning was given. It is incontrovertible that a locally generated tsunami could inundate Redcliffs Park in a matter of minutes, with no warning. There has been no analysis of this.</p> <p>No practical alternatives considered</p> <p>The Proposal should have, under section 65(1)(d), included <i>“(d) an explanation of why the proponent considers the exercise of the power is necessary and preferable to any alternatives to the exercise of the power;”</i>.</p> <p>Inexplicably the Proposal failed to consider the three obvious alternatives:</p> <ol style="list-style-type: none"> 1. Rebuilding the school on the current site; 2. Returning the school to the existing school on the current site; and 3. Moving the school to another site such as Barnett Park. <p>This failure is so egregious that the Proposal should be withdrawn and resubmitted.</p> <p>Reasons the School Should Not be MOVED to Redcliffs Park</p> <p>Redcliffs School should return to the existing safe school on its existing safe site. The Ministry of Education has refused to give any cogent reason for abandoning the site. Section 71 prevents a proper hearing on this matter. Section 71 must not be used when there is a valid alternative to the proposed land swap. <i>“Psychosocial effects”</i> (paragraph 1.3 of the Proposal) are frankly ludicrous. No children who were at school during the earthquake will return to the re-opened school: they will be at high school. Added is the fact that the school remained open for an extended period after the 2011 earthquake. <i>“Psychosocial effects”</i> were used to justify moving the school when there were no engineering or other real reasons for</p>	
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		<p>moving it. The submissions in 2016 of the Board of Trustees of Redcliffs School⁵ say it better than I can:</p> <p>“The Board’s view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board’s view is based on the fact that there are no objective reasons why the school should not return to the Main Road site. The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community. No other issues remain relevant to the assessment, all having been dealt with in previous Board submissions and Education Reports. The Redcliffs’ school community has waited patiently for the results of this further enquiry, and there now appears to be no reason why the school should not return to its original site.The Board has already started to develop strategies and procedures to support the recommendations raised in the psychosocial report. (Appendix 1) These strategies and procedures will sit within the normal governance and management framework of the school. The Board considers that the plan detailed below will become a core part of the school’s normal consultation processes and development of policies, procedures, and its strategic, annual and curriculum plans.... Redcliffs Park (site C) is much closer to cliff faces than any school buildings on the Main Road site are, or will be. The Board’s view is that the psychosocial issues at both sites are likely to be similar and that the sort of support and normalisation of the environment recommended by the experts would need to occur irrespective of the site, simply because of the nature of the physical environment surrounding.”</p> <p>Redcliffs Park is an excellent, much used public waterfront park. It is, however, flood prone (it flooded twice in 2017), and is unsuitable</p>	
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	<p>as a school site. The Ministry of Education publicly consulted no-one about taking the park. Analysis of the options for a school site in Redcliffs make it the least suitable site of the three available. The existing school site is far and away the best site, according to the Ministry's own site analysis tool.</p> <p>Furthermore, the existing site has a very attractive 10 room school already on it, which can be refurbished and re-occupied at a fraction of the cost and time required for a new school to be built on an unsuitable alternative site.</p> <p>The existing school continued to be operated for several months after the February 2011 earthquake - only fear precipitated the move to Sumner. Geotechnical studies subsequently established that this fear was unsubstantiated.</p> <p>Threat to children</p> <p>The park is right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated, and is completely unnecessary.</p> <p>Tsunami</p> <p>As noted above, it is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated by a Canterbury earthquake, and can hit the shore in minutes with no warning. The tsunami warning was only issued hours after the Kaikoura quake: I was awake (living at Mt Pleasant at the time) and I was communicating by twitter with the civil defence authorities seeking confirmation that there was no tsunami. They assured me that there was not. They were wrong. Obviously Redcliffs Park is at risk of a tsunami and if there is a school there, there may be inadequate warning to evacuate. This is an obvious danger that has not yet even been assessed.</p> <p>Inundation and Climate Change</p>	
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	<p>The Ministry of Education has not taken into account climate change. In fact during a meeting at Redcliffs library in 2017, the Ministry official present expressed scepticism that climate change is real. Sea level rise of even a metre – which is absolutely inevitable – would obviously drown Redcliffs Park and mean that the school if relocated, would be perched overlooking not a park but the estuary. The danger of drowning would be even more acute, and there would be no playing fields. Worse, Redcliffs Park would have been taken for no reason. Whether it takes one, two or even three decades to be permanently inundated, it will be inundated. It makes far more sense to retain Redcliffs Park as a park, and, as was earlier suggested, make it a ‘soft edge’ with the estuary and integrate it with the estuary. That way at least the public would be able to enjoy it in upcoming years, and any inundation will be able to be dealt with by the Council as a park – such as simply by moving the cycleway further back, for example. And the Ministry would not have spent tens of millions of dollars to build a school which then has to be relocated.</p> <p>The Value of the Park</p> <p>Redcliffs Park is used more and more every week. The Coastal Pathway brings cyclists, roller skaters, walkers and joggers to the Park in increasing numbers. The Fun Run brings hundreds at once a year, the Park is used by school sports in weekend, and every single day by children playing in the park, by families picnicking, and by families kicking a ball around. There are far too few green spaces. To take one for a school, beside the ocean, particularly when it is unnecessary, is not only wrong, but would be a historic mistake.</p> <p>No Need</p> <p>As has been said, there is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has built in resilience to sea</p>	
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	<p>level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary.</p> <p>I have seen and endorse the submission of Friends of Redcliffs Park, Inc, and like that Society, attach the October 10, 2016 submissions of the Board of Trustees about the unsuitability of Redcliffs Park. That they have changed their mind since then can only be attributed to them having been in effect forced by the previous National Minister of Education into a submissive position against the threat that if they stood up for the current site, they would get no school. This wrong should be righted, now.</p> <p>In short, the site is perfect for a school. The decision to move the school was made for what can only be described as spurious reasons by the previous government. The bad decision must be rescinded.</p> <p>Conclusion</p> <p>It is worth repeating the CCC observation: “the proposal should address why it is being proposed in such an area” (being one of high flood hazard). It did not.</p> <p>For the reasons given in this submission, the Minister is respectfully requested to:</p> <ul style="list-style-type: none"> i) Reject or place on hold the exercise of power under section 71, and ii) Request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site. <p>Finally... a bullet point list for extra elucidation</p> <ul style="list-style-type: none"> 1. The high volume of traffic on Main road at its narrowest section is a major hazard not to mention an added complication for commuters. 2. We have already mentioned the inclusion in the Tsunami zone!!! 	
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		<ol style="list-style-type: none"> 3. It faces, on Main Road, a rockfall site above the Moa cave. 4. The site is very cramped (which will mean building onto the park itself) 5. The proposed school site will be on archeologically significant ground which I'm sure will require further investigation (and if the investigation of our house site was anything to go by the bill could reach into the million dollar bracket) 6. We also object to the Ministry spending a significantly large number of millions (taxpayer's money) on going ahead with such an ill-considered project when the existing school could be recommissioned for considerably less. 7. It seems as though the Ministry of Education is pig-headedly continuing on with this idea in spite of recommendations from their own experts and continuing to spend taxpayer's money all along. 8. Not to mention the additional costs the city must bear to change all the roading and the aggravation to all residents in the area. <p>I would like to state for any official record that we fully support the retaining of Redcliffs school at its' present site.</p> <p>We oppose the effrontery of the Ministry of fruitless spending of our tax dollars</p> <p>Yours sincerely</p>	
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301	<p>REDCLIFFS SCHOOL AND REDCLIFFS PARK: SECTION 71 GREATER CHRISTCHURCH REGENERATION ACT PROPOSAL</p> <p>Thank you for the opportunity to comment on the final version of this proposal to make changes to the Christchurch District Plan. In the short time available for submissions, the revised proposal has not been able to be reported formally to Council (but has been made available to all Councillors), so the following letter represents Council's views at an officer level.</p> <p>For the sake of completeness and clarity, we wish to resubmit the same feedback (which was approved by Council) provided previously to Regenerate Christchurch on the draft Section 71 proposal (see letter dated 13 November 2017, appended as Attachment A). The following comments should be seen as complimentary to our earlier formal feedback on the draft proposal. For the most part, Council officers comments in this letter simply expand on salient points made in our 13 November 2017 feedback. As previously reported, Council recognises and understands the importance of Redcliffs School to the Redcliffs community in particular, and is supportive of its speedy return to that community. Council officers are appreciative of the amendments that have been made to the designation conditions to reflect the concerns expressed in the CEO's letter dated 13 November 2017. These include conditions that the buildings be located as far as practicable from Mean High Water Springs, and that there be no filling of land within the High Flood Hazard Management Area without compensatory storage. In regard to the latter, Council officers note that Council originally sought that there be no filling below the terrace at all, i.e. that the condition also apply to the Flood Management Area which extends outside of the High Flood Hazard Management Area between the latter and the terrace. Any filling of the lower area of the park remains of concern in terms of its potential to displace floodwater onto surrounding properties.</p>	<p>Sec71 GCRA Proposal and Statement of conferencing discussion also submitted</p>
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	<p>It is noted that Council officers have largely reached agreement with the Ministry of Education on the roading improvements required for the new school, outside of the designation and rezoning process. However it is also noted that the wording of the condition proposed by Council relating to the results of a road safety audit (e.g. of pedestrian crossing location and design, and measures to address vehicle speeds in the vicinity of the school) has been amended. Condition 16 of the final proposal only states that “particular consideration” will be given to those matters. It is the view of Council officers that ensuring pedestrian and vehicle safety in the vicinity of the new site is not optional and requires stronger wording than “particular consideration”.</p> <p>Council officers’ foremost concern with the final proposal is the wording of Paragraphs 4.8 and 4.9 of the proposal in relation to flood risk (pages 8 and 9). These statements are not consistent with, and do not accurately reflect Council’s original advice, the peer review of Tonkin and Taylor’s Hazards Reports on the proposal by Jacobs Ltd dated 15 December 2017, <i>Page 2 20 March 2018 Redcliffs School and Redcliffs Park : Section 71 GCRA Proposal</i></p> <p>or the statement of the conferencing discussion between flooding experts (including Council’s expert) which took place on 19 December 2017.</p> <p>1 A copy of the flood conferencing statement is attached to this letter as Attachment B.</p> <p>The statements in the final proposal which Council officers disagree with are set out and discussed in 1) to 3) below:</p> <p>1) “The proposed development of the site as a school will result in an extremely low risk to life in the timeframe to 70 years” (paragraph 4.8).</p> <p>Jacob’s peer review advice is that while there may technically be a low risk to life, the 0.5m limiting depth for risk to children could occur in extreme estuary water level events even within a 50 year</p>	
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		<p>time horizon, and with a distant source tsunami event (with or without any sea-level rise).</p> <p>In contrast to the 70 year figure in statement (1), the flood experts conferencing record states in the table attached to the statement, that over the 30 -70 year time period, <i>“there is increasing uncertainty.... as to the nature of the natural hazard events, and their associated effects. Further work would be required to address that uncertainty”</i>. If undertaken, such work would generate <i>“greater understanding of the relationship between the frequency of the hazard (coastal inundation and/or rainfall event), the depth and extent of inundation and the time required to clear any water from around buildings and the lower park area.”</i></p> <p>Council officers are concerned that Statement 1) is being made in such a definite manner as the statement does not come from the peer review nor from the conferencing statement and is inconsistent with both. Officers do not agree with the unqualified statement that there is an extremely low risk to life in the timeframe to 70 years, and they consider the statement has the potential to mislead the public.</p> <p>2) “There is unlikely to be significant damage or loss to the proposed buildings as a result of inundation, subject to design and location requirements” (paragraph 4.8).</p> <p>The Jacobs peer review states that:</p> <p><i>“For time periods beyond 50 years, the effect of sea level rise on extreme estuary water levels has the potential to result in water levels across the park being close to those in 100 year ARI events, with the combined effects of sea level risk and increased ground water levels also resulting in longer duration ponded water around any buildings in these locations, following high rainfall events. Both of these situations could result in issues for water under buildings on piles, student egress to and from buildings, and potentially for the provision of services around the buildings.”</i></p>	
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	<p>3) “While the lower part of the site is likely to experience a long-term change in its nature in the absence of any community-wide mitigation, there will be no exacerbation of the effects of the natural hazards arising as a result of the proposal provided there is no filling on the site” (paragraph 4.9).</p> <p>This statement is accurate based on effects of a school on the natural environment itself. However it is the reverse which is actually the issue of concern, ie the effects of the natural environment and natural hazard risk on a school in this location, including use of the lower area of the site. The peer review indicates at paragraph 4.2, that ponded water depths could be twice as deep in the 100 year time horizon than in the 50 years, and there is likely to be reduced capacity to drain to the estuary due to higher base sea levels, with longer wet period <i>Page 3 20 March 2018 Redcliffs School and Redcliffs Park : Section 71 GCRA Proposal</i></p> <p>Inundation. Significantly, the peer review states that Beachville Road would most likely be impassable during extreme estuary water level or rainfall events within a 50 year time horizon, creating issues for the proposed pick-up/drop-off area on Beachville Road. Inundation by estuary water is also likely to have detrimental consequences for grass cover of playing fields and for landscaping. Council officers are concerned that Statement 3) is narrowly made, based only on effects of the school on the physical environment. “Effects” under the Resource Management Act include potential and actual effects on the wider environment, with the environment defined to include people and communities.</p> <p>Regional Policy Statement (RPS) Policy 11.3.1 “Avoidance of inappropriate development in high hazard areas” is given effect to in Policy 5.2.2.2.1 of the District Plan for High Flood Hazard Management Areas. This policy requires the avoidance of any increase in potential risk to people’s safety, wellbeing and property in High Flood Hazard Management Areas. The Redcliffs School</p>	
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	<p>proposal as submitted by Regenerate Christchurch introduces a population of school children into such an environment. The safety of school children is obviously the most critical matter, but not the only one that needs to be considered. For example, the “educational purposes” designation would provide for a wide range of school and community activities to take place both during and outside school hours, and inside and outside of the buildings. It remains unclear to Council officers that these issues have been adequately addressed in the proposal.</p> <p>Emerging Technical Information</p> <p>It should be noted that there has been recent work on the consequences of a near source tsunami originating from one or more of the faults in Pegasus Bay². On a 1 in 500 year basis (which is the same level of probability used for High Flood Hazard Management Areas), maximum wave heights are likely to be between 1m and 1.5m. This would result in water depths comparable with those resulting from more standard coastal flooding events, with a much shorter warning time than for a distant source tsunami. It would seem appropriate to cover this risk in the proposed Flood Response Management Plan. ECan classifies this area as within an “orange” tsunami evacuation zone (evacuate if you feel a long or strong earthquake).</p> <p>² Land Drainage Recovery Programme: Tsunami Study: NIWA, February 2018.</p> <p>Council is currently undertaking a Multi-Hazards Assessment Project under which design return period water levels have been re-evaluated, because of the occurrence of very high estuary water levels on several recent occasions. Preliminary indications from these technical evaluations are that the boundary elevation for the High Flood Hazard Area could be 440mm higher than the current boundary, and for the Flood Management Area up to 240mm higher than currently. This means that flooding and coastal inundation events may be larger, potential water depths greater,</p>	
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		<p>and the need for mitigation may occur earlier than projected at present for the Redcliffs School. More technical information is available on request.</p> <p>Summary</p> <p>As was the case with our earlier feedback on the draft proposal, Council officers are of the view that the proposal struggles to meet the intent of the RPS Policy in the case of each of the three statements in paragraphs 4.8 and 4.9 of the proposal. Council officers also wish to emphasise that there are no current or future coastal mitigation measures proposed for this <i>Page 4 20 March 2018 Redcliffs School and Redcliffs Park : Section 71 GCRA Proposal</i></p> <p>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.</p> <p>While Council officers acknowledge that under Section 69 of the Greater Christchurch Regeneration Act, the proposal cannot now be amended, they are of the view that inter alia:</p> <p>(a) 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).</p> <p>(b) 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. The relevant Council officers will also be happy to discuss further any of the technical matters raised in this letter.</p> <p>Yours sincerely</p>	
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302	Yes	<p>The Redcliffs School BoT fully supports the redesignation of Redcliffs Park to be used for education purposes to allow us to return our school to Redcliffs as expediently as possible. As time passes, the delays to our return are getting harder and harder for us to manage. We have already been off site for approaching 7 years and have managed to maintain a thriving school in this time through committed families, teaching staff and leadership. We have expended vast reserves of expertise, energy and good will to get us to where we are now. and our community is exhausted and ready to return home. The proposal to locate the school in Redcliffs Park has been the only viable option to return to Redcliffs ever given to us. We understand that all technical opposition to the school being built in Redcliffs park have been addressed, making this a good a site as any in Redcliffs to build a school. The MOE have committed to building our school, ready for opening in 2019, on this new site, no such option exists for any other site. We appreciate your complete openness in your decision making. Providing us with confidence that both a technically suitable, and publicly desirable solution has been reached.</p>	
303	Yes	<p>I totally agree with the proposal to use section 71 of the Greater Christchurch Regeneration Act 2016 to make changes to the District plan to designate Redcliffs park for education purposes, and for the existing Redcliffs school site to be rezoned as a park. This would speed up the process in returning Redcliffs school to the heart of its community whilst also retaining a valuable park in the village. The community has been resilient steadfast and patient in its support for redcliffs school to return. Whilst appreciative of the kind use of Van Asch in Sumner, as Redcliffs temporary school site, it is now time to move forward with the planning and building of our new school in Redcliffs, where it belongs. Thank you.</p>	

304	No	<p>Dear Minister, You have sought submissions by 5pm on 3rd April 2018.</p> <p>1 Do I agree with the proposed use of section 71 of the GCR Act 2016? ----- No</p> <p>2 Reasons for not using Section 71 Circumstances have changed since the original suggestion that action under s71 may be the appropriate process to consider the Ministry of Education Proposal .</p> <p>(i) Referring to s65 (2) of the GRC Act it is not “necessary” because the then Minister’s main concern was for the pupil safety of the current school site. Subsequent investigation determined that the current Main Rd site can be used for a school without considering alternates. The danger from rock fall was refuted by the School Board of Governors’ consultant Geotechnical engineers at the time when submissions on the closure of the school were sought Submissions were invited for support or otherwise for the school at its existing site.</p> <p>Support from the community and school was overwhelming but the Minister in reply proposed “ no school or a new school on Redcliffs Park” The previous Minister’s concern has not been justified. Now included in the summary of feedback from the City Council on the current proposal is the comment “<i>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</i>” Given that the current site can be used (without a bund) for a park it can also be use for a school.</p>	
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	<p>(ii) Also referring to s65(2) of the GRC Act 2016 action under s71 is not “preferable” because there is an alternate. If the proposal to move the school to Redcliffs Park does not proceed an immediate start can be made on refurbishment of the existing buildings on site or if necessary the building of a new school. No planning redesignations would be needed. The focus of the current proposal is the suitability of Redcliffs Park for the school community. If the proposal proceeds the issue of the benefits of Redcliffs Park to the wider community must be given equal and high priority.</p> <p>An alternative to s71 action is to have the proposal considered by 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. The wider issues can be considered in this process and not limited to the changes of 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. Again action under s71 is not “necessary or preferable”.</p> <p>3 Items to be considered if the s71 process proceeds</p> <p>High Flood Hazard Zone Redcliffs Park is in a High Flood Hazard Zone. The current school site is not.</p> <p>Site Coverage It would not be possible to build the whole new school on the high land beside Main Rd. The 4 metre set back would leave approximately a short 15 wide metre high strip. No filling is proposed on lower levels. (Canterbury Regional Council request)</p> <p>Traffic Issues</p>	
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		<p>Council Plans for Main Rd between the Moa Cave and the Main Rd frontage of the proposed school are not compatible with the intention to build on the high ground, Council intends to remove the eastern bus stop outside 5 Main Rd. A footpath is scheduled for the western side of Main Rd in front of Moa Cave. Two cycle lanes and two 3.3 metre traffic lanes are shown on draft plans. There may be not sufficient space in the road corridor for this. Additional Council owned land on the east of Main Rd may be required. The traffic report for Regenerate Christchurch takes no account of traffic increases expected when Evan Pass / Sumner Rd to Lyttelton opens at the same time as the new school would. This traffic including larger trucks will be negotiating the intersection of Main Rd / Beachville Rd / McCormacks Bay Rd.</p> <p>Other Infrastructure</p> <p>All services, water, stormwater, sewer, power, telecoms, and landscaping are on the current site. All are to be provided or reticulated on the Redcliffs Park site. Relocation of some services (sewer vents and sewer pipes) recently installed across Redcliffs Park will require additional funding by whom.</p> <p>Demolition of Existing School Buildings.</p> <p>None of the remaining buildings on the current school site are to be removed until the Redcliffs Park site has full approval to proceed, Some of the school buildings have been removed since the Earthquakes. There must be always the option to come back to the current school site if unforeseen issues arise. e.g. contamination, future flooding, funding issues, before a new school is built.</p>	
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 Greater Christchurch Regeneration

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To: info.gcg@dpmc.govt.nz

Re: [Redcliffs School and Redcliffs Park relocation: Section 71 Proposal](#)

This is a submission on the Proposal to exercise a section 71 power: to relocate Redcliffs School to Redcliffs Park.

Scope and Objective of Consultation

Firstly, the scope of the Proposal is incorrectly stated in paragraph 5.9 when it states that

“The policy decision to relocate the school has been made, and the relocation of Redcliffs School and establishment of a community park in Redcliffs involves a discrete scope – with the physical scope limited to Redcliffs Park and the current Redcliffs School site; and the scope of documents limited solely to the District Plan.”

In fact, the proposal is as stated by the title: “Proposal to exercise the power ... to designate Redcliffs Park for education purposes and for the existing Redcliffs School site to be rezoned as Open Space”. Obviously, the appropriateness of the designation of Redcliffs Park for education purposes is within the scope of the consultation. Any RMA process would consider the substantive basis of the decision. Any section 71 process must do so as well. Section 65(2) of the Greater Christchurch Regeneration Act 2016 (GCR Act) states that the draft proposal must contain: “(a) an explanation of what the exercise of the power is intended to achieve”. Clearly the object of the exercise of the power is not only an issue, but the main issue, under consideration.

This is important because the policy decision itself is flawed and is based upon inadequately and misleadingly prepared and presented recommendations by the Ministry of Education, without any consultation with the school or its community. The decision is fundamentally flawed and patently without basis.

The current Minister, Dr Megan Woods, appreciates the importance of broad community engagement, creativity and vigilance. She said during the third reading of the Bill:

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		<p>“What we have got now is a very useful structure for how we can take our city and our region forward, but what it requires now is an operationalisation. As I have been saying to many of the grassroots organisations in Christchurch: “Your job is not done. Your job is not complete here.” We have a good piece of legislation, but we still need community involvement more than ever. We still need that level of phase of our regeneration. That is something that the Labour Party will commit to doing for the next year and a bit that it is in Opposition. engagement, we still need that level of creativity, and we still need the level of vigilance that we have seen from the community in Christchurch over its future for the next 5 years as we enter this new It will continue to be vigilant in holding the Government to account, but these are structures that can work if we all work together and work for the betterment of our city.”⁶</p> <p>So for this reason alone, the Proposal should be withdrawn and properly framed as a proposal to move the school to the Park, which is what it is. Better yet, the Minister of Education should be asked to re-assess the proposal, which is, as will be seen below, seriously flawed from its genesis and which continues to be seriously flawed. The metaphor of a slow train crash comes to mind. There is still time to turn the train around.</p> <p>The Proposal⁷ states misleadingly (paragraph 2.2) that “[t]he objective of this proposal is to support the regeneration of greater Christchurch through retaining both the primary school and a park within the Redcliffs community.” (emphasis added). In fact, the objective is to move the primary school to the park: it is moving the school to the park, and the park to the school It is not retaining either. The Proposal goes on to state that “Specifically, the exercise of power will expedite the change of use on these two sites such</p>	
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		<p>that the regeneration of the Redcliffs community is enabled.” That is not correct either.</p> <p>Under the GCR Greater Christchurch Regeneration Act 2016 Act, one of the purposes is stated in section 3(1) (c) as “(c) enabling community input into decisions on the exercise of powers under section 71 and the development of Regeneration Plans.”</p> <p>‘Regeneration’ is defined by section 3(2)(b) to mean</p> <p style="padding-left: 40px;">“(b) improving the environmental, economic, social, and cultural well-being, and the resilience, of communities through— (i) urban renewal and development: (ii) restoration and enhancement (including residual recovery activity)”</p> <p>And</p> <p style="padding-left: 40px;">“urban renewal means the revitalisation or improvement of an urban area, and includes—</p> <p style="padding-left: 80px;">(a) rebuilding:</p> <p style="padding-left: 80px;">(b) the provision and enhancement of community facilities and public open space.”</p> <p>This is important for two reasons: the current proposal to relocate Redcliffs school to Redcliffs Park would mean not the provision and enhancement of community facilities and public open space, but the opposite: the conversion of community facilities (being the playground and the park) and public open space for use by the school. As such the relocation proposal is contrary to the purpose of the Act.</p> <p>So it is not correct that “the regeneration of the Redcliffs community is enabled”. Instead, community facilities and the open space would be irreparably damaged by this proposal. Regeneration can take place, far more simply, cheaply and safely, by returning the school to its original location, without further delay.</p>	
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		<p>This inaccurate reframing of the proposal is continued in paragraph 2.3 which states that “The exercise of powers under section 71 will ensure that the Redcliffs community is once again served by a local school together with providing for the recreation needs of the community.” The recreational needs of the community are in no way provided for: they are irreparably damaged by taking over a valued waterfront park and putting a school in its place: a school that not only does not need to be on the waterfront, but should not be, due to inundation, sea level rise, danger to children from the ocean and tsunami risk.</p> <p>Paragraph 2.3 goes on to state that “[t]echnical analyses support the change in use of the two sites and confirm that a new school site can be safely located on the Redcliffs Park site.” That is not correct either. The analyses do not confirm that it is safe from a locally generated tsunami, do not confirm that it is safe from inundation, do not confirm that it is safe from sea level rise and do not confirm that children will be safe from drowning in the fast current immediately beside the current park.</p> <p>The error is repeated in paragraph 4.2 by stating that “[t]he exercise of power will facilitate the timely rebuilding of the Redcliffs School in a safe location”. For the reasons stated above, the location is not safe for a school. Nor is it appropriate. More accurate is paragraph 4.7:</p> <p>“Technical analysis indicates that the lower land levels of the proposed school site are identified as being subject to natural hazard risks comprising: flooding, liquefaction and tsunami.”</p> <p>The assessment of inundation in paragraph 4.8 is misleading. It is based on assessments of sea level rise, and scientific knowledge of sea level rise is far from complete. What we do know is that the site is subject to inundation and that will be exacerbated by sea level rise. While the school buildings may be situated above the rising sea</p>	
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	<p>levels due to engineering, that ignores the fact that the school itself would be built on a site subject to inundation, and will have been moved from a much higher site. These facts are obscured in the Proposal. More accurate is the expression by the Christchurch City Council in the Concise Statement of Views:</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. 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.” [emphasis added]</p> <p>And by the Canterbury Regional Council in the same document: “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. 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. 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>As the CCC stated, the proposal should address why it is being proposed in such an area. T does not.</p> <p>The tsunami risk is mis-stated. Paragraph 4.12 states that “[a]s with the surrounding areas, tsunami risk affects the site. However, as</p>	
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	<p>with the general area it is expected that there will be considerable warning time for a distant source tsunami such that risk to life is appropriately managed.”</p> <p>Anybody familiar with the October 2016 Kaikoura earthquake will be aware that it generated a tsunami, and that no timely warning was given. It is incontrovertible that a locally generated tsunami could inundate Redcliffs Park in a matter of minutes, with no warning. There has been no analysis of this.</p> <p>No practical alternatives considered</p> <p>The Proposal should have, under section 65(1)(d), included “(d) an explanation of why the proponent considers the exercise of the power is necessary and preferable to any alternatives to the exercise of the power;”.</p> <p>Inexplicably the Proposal failed to consider the three obvious alternatives:</p> <ol style="list-style-type: none"> 1. Rebuilding the school on the current site; 2. Returning the school to the existing school on the current site; and 3. Moving the school to another site such as Barnett Park. <p>This failure is so egregious that the Proposal should be withdrawn and resubmitted.</p> <p>Reasons the School Should Not be Moved to Redcliffs Park</p> <p>Redcliffs School should return to the existing safe school on its existing safe site. The Ministry of Education has refused to give any cogent reason for abandoning the site. Section 71 prevents a proper hearing on this matter. Section 71 must not be used when there is a valid alternative to the proposed land swap. “Psychosocial effects” (paragraph 1.3 of the Proposal) are frankly ludicrous. No children who were at school during the earthquake will return to the re-opened school: they will be at high school. “Psychosocial effects” were used to justify moving the school when there were no engineering or other real reasons for moving it. The submissions in</p>	
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	<p>2016 of the Board of Trustees of Redcliffs School⁸ say it better than I can:</p> <p>“The Board’s view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board’s view is based on the fact that there are no objective reasons why the school should not return to the Main Road site. The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community. No other issues remain relevant to the assessment, all having been dealt with in previous Board submissions and Education Reports. The Redcliffs’ school community has waited patiently for the results of this further enquiry, and there now appears to be no reason why the school should not return to its original site.The Board has already started to develop strategies and procedures to support the recommendations raised in the psychosocial report. (Appendix 1) These strategies and procedures will sit within the normal governance and management framework of the school. The Board considers that the plan detailed below will become a core part of the school’s normal consultation processes and development of policies, procedures, and its strategic, annual and curriculum plans.... Redcliffs Park (site C) is much closer to cliff faces than any school buildings on the Main Road site are, or will be. The Board’s view is that the psychosocial issues at both sites are likely to be similar and that the sort of support and normalisation of the environment recommended by the experts would need to occur irrespective of the site, simply because of the nature of the physical environment surrounding.”</p> <p>Redcliffs Park is an excellent, much used public waterfront park. It is, however, flood prone (it flooded twice in 2017), and is unsuitable</p>	
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		<p>as a school site. The Ministry of Education publicly consulted no-one about taking the park. Analysis of the options for a school site in Redcliffs make it the least suitable site of the three available. The existing school site is far and away the best site, according to the Ministry's own site analysis tool.</p> <p>Furthermore, the existing site has a very attractive 10 room school already on it, which can be refurbished and re-occupied at a fraction of the cost and time required for a new school to be built on an unsuitable alternative site.</p> <p>The existing school continued to be operated for several months after the February 2011 earthquake - only fear precipitated the move to Sumner. Geotechnical studies subsequently established that this fear was unsubstantiated.</p> <p>Threat to children</p> <p>The park is right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated, and is completely unnecessary.</p> <p>Tsunami</p> <p>As noted above, it is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated by a Canterbury earthquake, and can hit the shore in minutes with no warning. The tsunami warning was only issued hours after the Kaikoura quake: I was awake (living at Mt Pleasant at the time) and I was communicating by twitter with the civil defence authorities seeking confirmation that there was no tsunami. They assured me that there was not. They were wrong. Obviously Redcliffs Park is at risk of a tsunami and if there is</p>	
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	<p>a school there, there may be inadequate warning to evacuate. This is an obvious danger that has not yet even been assessed.</p> <p>Inundation and Climate Change</p> <p>The Ministry of Education has not taken into account climate change. In fact during a meeting at Redcliffs library in 2017, the Ministry official present expressed scepticism that climate change is real. Sea level rise of even a metre – which is absolutely inevitable – would obviously drown Redcliffs Park and mean that the school if relocated, would be perched overlooking not a park but the estuary. The danger of drowning would be even more acute, and there would be no playing fields. Worse, Redcliffs Park would have been taken for no reason. Whether it takes one, two or even three decades to be permanently inundated, it will be inundated. It makes far more sense to retain Redcliffs Park as a park, and, as was earlier suggested, make it a ‘soft edge’ with the estuary and integrate it with the estuary. That way at least the public would be able to enjoy it in upcoming years, and any inundation will be able to be dealt with by the Council as a park – such as simply by moving the cycleway further back, for example. And the Ministry would not have spent tens of millions of dollars to build a school which then has to be relocated.</p> <p>The Value of the Park</p> <p>Redcliffs Park is used more and more every week. The Coastal Pathway brings cyclists, roller skaters, walkers and joggers to the Park in increasing numbers. The Fun Run brings hundreds at once once a year, the Park is used by school sports in weekend, and every single day by children playing in the park, by families picnicking, and by families kicking a ball around. There are far too few green spaces. To take one for a school, beside the ocean, particularly when it is unnecessary, is not only wrong, but would be a historic mistake.</p>	
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	<p>No Need</p> <p>As has been said, there is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has built in resilience to sea level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary.</p> <p>I have seen and endorse the submission of Friends of Redcliffs Park, Inc, and like that Society, attach the October 10, 2016 submissions of the Board of Trustees about the unsuitability of Redcliffs Park. That they have changed their mind since then can only be attributed to them having been in effect forced by the previous National Minister of Education into a submissive position against the threat that if they stood up for the current site, they would get no school. This wrong should be righted, now.</p> <p>In short, the site is perfect for a school. The decision to move the school was made for what can only be described as spurious reasons by the previous government. The bad decision must be rescinded.</p> <p>Conclusion</p> <p>It is worth repeating the CCC observation: “the proposal should address why it is being proposed in such an area” (being one of high flood hazard). It did not.</p> <p>For the reasons given in this submission, the Minister is respectfully requested to:</p> <ul style="list-style-type: none">i) reject or place on hold the exercise of power under section 71, andii) request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site. <p>Sincerely</p>	
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306	No	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.	
307	No	The school should stay where it is. Redcliffs park not suitable - issues are flooding - tsunami risk - not fair on residents at edge of park. Parking issues and a waste of money.	
308	No	You will be recreating the new school on an area prone to flooding - check past history of this park. The obvious solution I would have through is to move the present school buildings closer to the main road and have the grounds at the back. Much cheaper too. Locals believe the present school site will pass to Maori hands.	
309	No	<p>Dear Minister,</p> <p>I oppose the proposal to move Redcliffs School to Redcliffs Park. Redcliffs Park has been a valued seaside community park for many years and continues to attract new users with the new cycleway. As the Board of Trustees of Redcliffs School said in October 2016 submission, "The Board's view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board's view is based on the fact that there are no objective reasons why the school should not return to the Main Road site." Though the Board's view changed following the decision by the then-Minister of Education, Hekia Parata to move the school to Redcliffs Park, the facts have not:</p> <p><input checked="" type="checkbox"/> There is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs</p>	

		<p>Park and thus has built in resilience to sea level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary.</p> <p>☐ Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a re-location to any other site.</p> <p>☐ Children at Redcliffs School during the earthquakes are now at high school, and the psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community.</p> <p>☐ It is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated by a Canterbury earthquake, and can hit the shore in minutes with no warning.</p> <p>☐ The park is right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated, and is completely unnecessary.</p> <p>☐ Sea level rise of even a metre as predicted would drown Redcliffs Park and mean that the school if relocated, would be perched overlooking not a park but the estuary. The danger of drowning would be even more acute, and there would be no playing fields.</p> <p>☐ Redcliffs Park is used more and more every week. The Coastal Pathway brings cyclists, roller skaters, walkers and joggers to the Park in increasing numbers. The Fun Run brings hundreds once a year, the Park is used by school sports in weekend, and every single day by children playing in the park, by families picnicking, and by families kicking a ball around. There are far too few green spaces.</p>	
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		<p>To take one for a school, beside the ocean, particularly when it is unnecessary, is not only wrong, but would be a historic mistake.</p> <p>The proposal fails to consider the three obvious alternatives:</p> <ol style="list-style-type: none"> 1. Returning the school to the existing school on the current site; 2. Rebuilding the school on the current site; 3. Moving the school to another site such as Barnett Park. <p>A review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the Greater Christchurch Regeneration Act 2016 (GCR Act).</p> <p>I therefore request that</p> <ol style="list-style-type: none"> i) you reject or place on hold the exercise of power under section 71 of the GCR Act, and ii) request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site. 	
310	No	No comments	
311	No	<p>FEEDBACK ON EXERCISE OF POWER UNDER SECTION 71 OF THE GREATER CHRISTCHURCH REGENERATION ACT 2016 TO RELOCATE REDCLIFFS SCHOOL TO REDCLIFFS PARK</p> <p>Proposal to exercise the power under section 71 of the Greater Christchurch Regeneration Act 2016 to designate Redcliffs Park for education purposes and for the existing Redcliffs School site to be rezoned as Open Space (referred to as “the Proposal”).</p> <p><u>I DISAGREE</u> with the Proposal.</p> <p><u>THE REASONS WHY I DISAGREE</u> with the Proposal:</p>	

		<p>If the Minister for Greater Christchurch Regeneration, Hon Dr Megan Woods proceeds with the Proposal, she is exercising her powers on the basis of unreasonable and unjustified decisions, and unfair and improper processes ridden with failings to the Redcliffs community and wider Christchurch including its ratepayers.</p> <p>Examples of the unreasonable and unjustified decisions, and the unfair and improper processes, made to relocate the Redcliffs School from its existing site to Redcliffs Park include:</p> <ol style="list-style-type: none">1. Duress from the former Minister of Education Hekia Parata on the Redcliffs School Board of Trustees<ul style="list-style-type: none">I am aware that the former Minister of Education Hekia Parata flew members of the Redcliffs School Board of Trustees, together with the principal of the School, to meet with her after a backlash on her decision to first close the School and then move the School to the Redcliffs Park site. My understanding is that the former Minister of Education made those people sign Non-Disclosure Agreements and threatened closure of the Redcliffs School if they did not support her decision to relocate the School to the Redcliffs Park site. Before that meeting, the Redcliffs School Board of Trustees were firmly in support of the School remaining on its existing site.2. Undue influence from the Redcliffs School:<ul style="list-style-type: none">After the meeting with the former Minister of Education Hekia Parata mentioned above, the School (driven by the Board of Trustees) influenced the School students and	
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		<p>community to support the relocation of the Redcliffs School to the Redcliffs Park site. This included the School's students writing submissions in support of the relocation of the School to the Redcliffs Park site during school time with their teachers, and hence those submissions from the students skewed the statistics of submissions favouring the relocation to the Redcliffs Park site.</p> <p>3. Without a fair time frame and process for public consultation:</p> <ul style="list-style-type: none"> • The decision makers have conveyed that there was extensive public consultation undertaken. • You will be aware this was undertaken from 29 May to 26 June 2017 and there was a panel hearing. • I do not consider the consultation time frame was long enough. • The panel hearing was unreasonable in that it favoured those in favour of the decision to relocate the School to the Redcliffs Park site, and those opposed to that decision had shorter time frames given to them during the hearing. <p>I personally had a representative orally speak to my submission as I had work commitments that I could not re-schedule on the day of the panel hearing. My representative was cut short by the convenor of the hearing and did not get the full designated time slot to speak. My representative was speaking on his own behalf, my neighbour's behalf and my behalf, and was only given approximately 7 minutes to speak, whereas all other speakers were given 5 minutes per submission.</p>	
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		<ul style="list-style-type: none"> • There was bias given during the panel hearing where the Redcliffs School student leaders were given a lot of media attention at the beginning of the hearing and the focus was mainly on the School students who were heavily influenced by the Redcliffs School Board of Trustees. <p>4. Without proper due diligence as to the suitability of the Redcliffs Park site including its hazards:</p> <ul style="list-style-type: none"> • The media has recently released that the Christchurch City Council has commissioned its own investigations as to the suitability of the Redcliffs Parks site as a school. The Council has a memorandum which warns the site is not sustainable for use as a school and will require extra protective measures within 30 years. The media has quoted the memorandum as stating the site is “not sustainable to be used for school purposes in the medium to long term”. • A Ministry of Education commissioned Tonkin & Taylor geo-technical report on Redcliffs Park has identified a site susceptible to liquefaction, surface flooding, geo-technical risk and coastal inundation within the next 50 years. As an adjacent property owner to Redcliffs Park, I have personally witnessed severe flooding on a number of occasions. • Where the Redcliffs Park is located is a quiet sleepy part of the Redcliffs community. I am confident the majority of residents in Celia Street/Beachville Road area are older and enjoy peaceful surroundings and regularly use the park for their own activities including walking and interacting with their dogs. Moving the Redcliffs School into this area of the Redcliffs community will significantly 	
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		<p>negatively impact the quiet and peaceful amenity to this area and the existing uses of the Redcliffs Park for these residents.</p> <ul style="list-style-type: none"> • I believe most families with primary school age children live on the same side of Main Road as the existing Redcliffs School site. If the School is moved to the Redcliffs Park site, there will be increased pedestrian traffic across a very busy Main Road and congestion around the ingress and egress of the School entrances. This creates a significant traffic hazard and risk to our young children in the community. There is no doubt that there will be increased costs associated with attempting to mitigate these hazards. <p>5. Without proper classification or investigation as to the suitability of the existing Redcliffs School site:</p> <ul style="list-style-type: none"> • The former Minister of Education Hekia Parata commissioned a report identifying suitable alternate sites for the Redcliffs School after the School was closed due to the February 2011 earthquake. This is the report that identified the Redcliffs Park site as the preferred site. That report omitted the existing Redcliffs School site from consideration. The report scored the identified alternate sites against a number of criteria. Subsequent investigations have exposed that the existing Redcliffs School site rated higher than all of the considered alternate sites. • I was eye witness to the damage to the area after the February 2011 earthquake. There was no damage to any of the Redcliffs School buildings resulting from rockfall. • Decisions regarding the School at the time were made in haste with parents in alarm resulting from aerial 	
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		<p>photography in the media showing rubble that had been moved and piled adjacent to the Redcliffs School Hall as part of the co-ordinated clean up in the area at the time.</p> <p>6. Without proper justification given to the decision to relocate the Redcliffs School to the Redcliffs Park site:</p> <ul style="list-style-type: none"> • If the existing Redcliffs School site is not suitable or safe for its students, why is the site being considered as a public amenity park? I am aware that there are plans that if this Proposal proceeds, the existing Redcliffs School site will become a sporting and recreational facility for the community. The users of this facility including students from the School will be susceptible to the same perceived risk. • The former Minister of Education eventually agreed the existing Redcliffs School site meets the safety requirements for a school but stated the relocation was necessary on 2 grounds: <ul style="list-style-type: none"> ○ The existing Redcliffs School site would be susceptible to disruption should there be a future event; and ○ The psycho-social effects on the Redcliffs School students returning to the existing Redcliffs School site being a barrier. • The Christchurch City Council's investigations detailed in my point 4 above have identified significant disruptive hazards to the Redcliffs Park site that I challenge are greater than those identified by the former Minister of Education in respect of the existing Redcliffs School site. • There will be no Redcliffs School students who would have been on site at the time of the February 2011 	
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		<p>earthquake who will be returning to the School due to the time frame that has passed.</p> <ul style="list-style-type: none"> • There will, however, be some of those former Redcliffs School students who would have been on site at the time of the February 2011 earthquake remaining in the Redcliffs community who will likely be forced to use the existing Redcliffs School site if it becomes a sporting and recreational facility. • The same psycho-social effects that the former Ministry of Education outlined as a barrier for the Redcliffs School to return to its existing site, equally apply to members of the community who are identified as being the users of the Redcliffs School site for a sporting and recreational facility. • If the existing Redcliffs School site becomes a sporting and recreational facility, there is a significant hazard for balls from that site landing or rolling into the traffic on a busy main thoroughfare. <p>7. Without proper consideration of the impact on the whole of the local Redcliffs community:</p> <ul style="list-style-type: none"> • Applying the Public Open Space Strategy (“POSS”), Heathcote ward already has a shortage of sporting /recreational space and the population of the ward is projected to grow. Christchurch City is meeting 87% of the POSS ideal, whereas Heathcote ward is currently only 73% with the inclusion of Redcliffs Park. The existing Redcliffs Park site is 4% bigger than the existing Redcliffs School site which poses the question of why would Minister for Greater Christchurch Regeneration Hon Dr Megan Woods exercise her power to make this already unsatisfactory situation worse. 	
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		<p>8. Without proper consideration of the costs associated with the relocation of the Redcliffs School to the Redcliffs Park site:</p> <ul style="list-style-type: none"> • Significant costs are required to: <ul style="list-style-type: none"> ○ Develop the Redcliffs School at the Redcliffs Park site (I understand estimated to be in the vicinity of \$10 million) where the amenities on the existing Redcliffs School site were not significantly damaged and were operational after the February 2011 earthquake. ○ Mitigate the hazards associated with increased pedestrian traffic across a very busy Main Road and congestion around the ingress and egress of the School entrances. ○ Develop the infrastructure requirements associated with the Redcliffs School being relocated to the Redcliffs Park site. ○ Develop the new sporting and recreational facility proposed at the existing Redcliffs School site (including the costs associated with the inherent geo-technical challenges including rockfall mitigation and ensuring an appropriately engineered public barrier is installed on that site). • The monetary impact of this decision is significant: <ul style="list-style-type: none"> ○ Burdening the ratepayers of Christchurch unnecessarily; ○ Coming at the opportunity cost to the Redcliffs community and wider Christchurch. 	
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		<p>9. Without proper consideration of the existing use and amenity that the Redcliffs Park gives to the community at its existing site:</p> <ul style="list-style-type: none"> • The existing Redcliffs Park site is a perfectly positioned amenity space for sporting activities due to the lower traffic volume (as a result of it being situated in the quiet sleepy part of the Redcliffs community). • The Redcliffs Park's existing use as a sporting ground compliments the other activities that members of the community currently use this space for including walking and interacting with their dogs. • If the Minister for Greater Christchurch Regeneration Hon Dr Megan Woods exercises her powers to achieve the Proposal, it is taking an open space amenity from the existing users of Redcliffs Park and not providing them with a suitable alternative space. • If the existing Redcliffs School site becomes an open space to replace Redcliffs Park, it is unlikely the Park's existing users will utilise the new proposed sporting and recreational facility at the existing Redcliffs School site due to its location on a busy main thoroughfare and its distance from the water and coastal pathway. <p>Additional comments: I am a long term resident of Redcliffs and its surrounding area including a former student of Redcliffs School. My three children are also past students of Redcliffs School. I am supportive of the Redcliffs community having a primary school. However, I believe that the former Ministry of Education Hekia Parata has made an unjustified and unreasonable decision to relocate the Redcliffs School which comes at a great cost and risk to the ratepayers of Christchurch and the Redcliffs community as I have set out above.</p>	
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	<p>I implore the Minister for Greater Christchurch Regeneration to consider what her decision in connection with the Proposal would do to reinforcing the unfair and improper processes that have already been imposed on the Redcliffs community and decide to not exercise her privilege to fast track the rezoning of the two sites. I request the Minister for Greater Christchurch Regeneration decides not to exercise her power in connection with the Proposal. If the Minister for Greater Christchurch Regeneration decides not to exercise her power in connection with the Proposal, it will highlight the failings of the former Minister of Education and will allow the Christchurch City Council adequate time to consider all risks and options available, and more importantly provide the Redcliffs community with a fair and proper process with regard to the proposed rezoning.</p> <p>I wish to see Redcliffs Park continue as an open space amenity to the Redcliffs community. It is a superior site for a park and loosing it would be a huge loss of unique amenity value to both the local and wider community. The current park site advantages are:</p> <ul style="list-style-type: none"> - Unique seaside park with open vista to estuary/marine environment - Linked with Coastal Pathway (ease of access) - Bigger site (when compared to alternative) - Safer sporting environment (not fronting onto a busy road) - Well utilised for – sporting events (Ferrymead Bays), community events (e.g Fun Run), recreational and leisure activities (and lets not forget about the dogs!) - Strong historical/archaeological/cultural significance - Relatively private space – which leads to a more relaxed space and tends to appeal to a wider age group and those wanting to get some exercise without being on display. - Etc 	
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		<p>There is no public open space benefit in the park/school being relocated – only increased risks, costs and time to the community, Council and rate payers.</p> <p>For the reasons stated above, I request the Minister of Greater Christchurch Regeneration to NOT exercise her power pursuant to section 71 of the Greater Christchurch Regeneration Act to vacate the current and much loved Redcliffs Park.</p>	
312	Yes	<p>I am writing in support of the re designation Redcliffs parks to become the sites of Redcliffs school. Redcliffs needs a local school for its children..... It is a unique community that has sadly missed a local school over the past 7 years..... Being a local resident and a parent of children that go to Redcliffs school @ Van Asch... it is well over due that this decision is confirmed so that stability can return to our children and their ongoing education and wider hauora needs. Whilst the use of the Van Asch site has been fantastic it is still no substitute to for a local school in our community. Thank you for your consideration and support for our young people.</p>	
313	No	<p>The land at Redcliffs park floods - surely an unsuitable space to build a school? Geotech professionals have deemed the original school site to be safe. Surely now we have a change of government the pathetic decision of the Education Minister could be revised/changed?</p>	
314	Yes		

315	Yes	After so long it is critical that this relocation happens with some urgency. The community needs some certainty. As a local resident I still witness each day how uncertainty is damaging our connectedness as a community. Please just get on with the relocation as a high priority. Thank you	
316	Yes	We would like to make several points 1) the last government made the decision to move the school, against the wishes of the local community who wanted it reinstated on the original site. 2) the geotechnical report stated that the school site could be made safe, with the possible exclusion of the hall 3) All of the children who were at school during the earthquake will have moved on to secondary school and therefore will not be upset by returning to the original site. 4) if further remedial work is needed to make the current site safer, this will be easier than combatting future rising sea levels on the proposed Redcliffs park site, 5) the lower area of Redcliffs park has always been damp. Given the projected rise in sea level the area will be prone to flooding, making access to the school difficult. 6) we have yet to meet anyone in Redcliffs/Sumner/Mount Pleasant area that thinks this is a good idea. But rather than have the school removed from the community we would very reluctantly accept this proposal. We have lived in the area for 38 years, our three children attended the school from 1980 to 1992 and we appreciated having a local school within the community.	
317	No	The present site of the school does not present the dangers stated while the Redcliffs park is low lying and subject to threats from rising sea levels.	
318	No	I object to the land swap because it is not necessary as the current site for a school has been chosen by report to the Ministry as the best. If a new school is deemed appropriate please build it on the current site and avoid the waste of time and money exploring other	

		less feasible options. Furthermore the proposed Redcliffs Park site is on a floodplain and is a beautiful park that shouldn't be lost to the community.	
319	No	As a resident of Redcliffs, my concerns are listed below..... Redcliffs school should remain on its present site because - the school is intact - its hall, now fenced off, would not remain as part of it - Refurbishment costs would be minor compared to the millions quoted for a new school - Engineering reports have shown the site can be made safe, in fact the CCC is suggesting using the site as a park and keeping the rear building on the southeast corner for public use. So there would still be public use of the present school site - Suggested psychological problems for students would not be relevant as no student who previously attended the school will be at primary level. Also students have met at the school twice daily for transport to and from Sumner school for the Deaf. - Redcliffs Park is prone to flooding and high tides will affect it. - Most children would need to cross a busy road twice daily to reach a school at Redcliffs park site - there appears to be no logic at all in the stance of the MOE.	
320	No	<p>Re: Redcliffs School and Redcliffs Park section 71 Proposal</p> <p>We wish to register our objection to the Proposal.</p> <p>We have been resident in the area, close to the school, for some 47 years, and all of our three children attended Redcliffs School. We personally served, separately, on both the School Council and the School PTA at different times. We therefore believe we have a good understanding of the issues relevant to the Proposal.</p>	

		<p>Our submission relates primarily to the following issues in the Proposal document:</p> <p><i>1.3 Following comprehensive submissions from the Redcliffs School community, the Minister of Education chose not to confirm the decision to close Redcliffs School, but to undertake further analysis. Following extensive analysis, including investigations into the psychosocial effects on children attending the school, the Minister of Education announced on 1 November 2016 that Redcliffs School should be reopened but relocated to the nearby Redcliffs Park.</i></p> <p><i>1.4 The relocation proposal requires the designation and rezoning of the Redcliffs Park land to facilitate development of a school, and rezoning of the Redcliffs School land to facilitate development of a park. Regenerate Christchurch (the proponent) is proposing the exercise of power under section 71 of the GCR Act to facilitate the necessary rezoning and designation of land in accordance with the relocation proposal.</i></p> <p>We clearly remember the substantial and sustained objections to the original plan to close the school, made to the then Minister by the then School governing body. That body's opinion – guided by professional geotechnical experts, was that the existing fallen rocks could be used to form a bund at the rear of the school site, to contain any further rock falls. If carried out to proper geotechnical standards, there would be no need to require moving the whole school to another site.</p> <p>The bund would be of the same general nature as the larger one recently constructed only about a kilometre away, at the Peacock's</p>	
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	<p>Gallop site. That bund is deemed adequate to protect a very heavily-trafficked "Lifeline" road through to Sumner.</p> <p>At the time, the then Minister overruled the School by using the argument that "... <i>psychosocial effects on children attending the school...</i>" required that the school be relocated.</p> <p>At the very least, that argument was controversial at the time, but it appeared that the ministerial decision was final. On the face of it, the DPMC Proposal has implicitly accepted that Ministerial decision without further question.</p> <p>The recent change in Government has meant that the Minister has also changed, and for that reason we feel it is timely to revisit that argument, using the best geotechnical and risk assessment information currently available.</p> <p>Further, given the City Council's view that "<i>The flooding issues associated with the use of the lower part of the proposed school site have been understated</i>", and that "<i>Much of the lower part of the site is within a High Hazard Area as defined in the CRPS</i>", we see it as undesirable to continue with urgency, to adopt the Proposal. Canterbury Regional Council's feedback makes a similar point.</p> <p>Yet another point is made by the City Council, which "... <i>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.</i>"</p> <p>This raises the question of whether children are to be physically excluded from the proposed recreational park. When the previous Minister is clearly on record as believing that "... <i>psychosocial</i></p>	
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	<p><i>effects on children attending the school...</i>" on that same area of land were sufficient to require that the school be closed and a new one built, we do not see that one can have it both ways. Either the site is safe or it is not!</p> <p>Overall, our opinion is that, subject to professional assessment of the geological risks associated with remedial work at the current school site, there would be considerable economic arguments in favour of carrying out the geotechnical repairs, plus refurbishment of the existing buildings other than those at the very rear of the site. If that is indeed feasible, the economic waste associated with building the new school, plus demolishing the old one and converting it into a park, could be avoided. The flooding risks associated with the proposed new site, taken together with reputable projections of sea level rise over the next few decades, would mean that the new school would have a very limited lifespan.</p> <p>Finally, we wish to emphasise that not only would re-opening the school on the existing site make economic sense as outlined above, it is what the wider Redcliffs community has consistently hoped for all along. The school community agreed to the shift of site under duress – they faced the choice of no school in Redcliffs or a shift of site.</p> <p>We submit that the school should be opened again on the existing site, consistent with the best of current geotechnical advice, as soon as reasonably possible.</p> <p>31 March 2018</p>	
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321	No	The entire situation is total madness and no common sense has prevailed at any stage during this debacle. We should never be discussing this other site at all. The original site has been declared safe from rockfall etc and all that needs to be done is an extra safety Bundment similar to what was used on the Sumner Road near Evans Pass built behind the school and then tidy up the existing classrooms or rebuild new ones that site. The new site is totally unsuitable re flooding, housing, parking for pick up and drop off and who goes Tsunami. Don't waste any more time or money with consultations or reviews just get on and go back to its home base.	
322	No	Not only will there be a problem in the future with rising water levels but this area is already prone to a high water table. For parents dropping children off and returning to the main road and right towards town traffic could also be a problem.	
323	No	This is not a good idea. We are all aware of the coastal inundation and these properties have been made aware of the future problems. The city council should not allow building in unsafe area. This is asking for trouble. Don't go there. Our children must be safe.	
324	No No	a) at risk from a major tsunami b) at risk from flooding in the future due to rising sea levels c) is space restricted d) no significant risks have been proved on the old site 3) it is cheaper to move existing buildings forward from the cliff face f) officialdom is riding rough shot over public opinion. The school should stay where it is. If it is okay to have a park there with people wandering around it must be safe so why not keep the status quo. It's a terrible waste of resources to demolish that beautiful school and then build on a flood prone area.	

325	No	The school should stay where it is. If it is okay to have a park there with people wandering around it must be safe so why not keep the status quo. It's a terrible waste of resources to demolish that beautiful school and then build on a flood prone area.!!	
326	No	I disagree because I am a long term resident of this part of Christchurch and have observed flooding of Redcliff's Park on certain occasions of storms (eg Wahine) and heavy rainfall. Besides this Tsunamis are likely in this age of Global warming. Just use the present site but move the rooms at the back up to the rooms near the road. PS Sumner school is nearer cliffs (which also fell down, and no one worries about that)	
327	No	Keeping the school at its original site makes lots of sense, lots of car and bus parking, and area room to manoeuvre in and out of the school grounds so as not to cause congestion etc.	
328	Yes	The children and the community have waited long enough. We need our heart back and that is the school!	
329	No	Waste of \$\$ What is the difference both areas will be used for children in either learning or sport. Redcliffs park has the risk of contaminated soil and tsunami along with the new blind corner on Beachville road. The current school site with most of the buildings is the perfect solution.	
330	No	I feel the present site of the school on Main Road is where our Redcliffs school should remain. Buildings are already there. The site on Beachville is prone to flooding and many people are unhappy to build a school there. Dollars can be saved by not reinventing what is already available.	
331	No	Dear Minister,	

I wish to express my opposition to the proposal to move Redcliffs School to Redcliffs Park. Redcliffs Park has been a valued seaside community park for over a hundred years and continues to attract new users with the new cycleway. As the Board of Trustees of Redcliffs School said in October 2016 submission, "The Board's view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board's view is based on the fact that there are no objective reasons why the school should not return to the Main Road site." Though the Board's view changed following the decision by the then-Minister of Education, Hekia Parata to move the school to Redcliffs Park, the facts have not:

- Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a relocation to any other site.
- There is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has the built-in resilience to sea level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary.
- The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community.
- It is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated

		<p>by a Canterbury earthquake, and can hit the shore in minutes with no warning.</p> <ul style="list-style-type: none"> · The park is right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated and is completely unnecessary. · Sea level rise of even a meter – which is absolutely inevitable – would obviously drown Redcliffs Park and mean that the school if relocated, would be perched overlooking not a park but the estuary. The danger of drowning would be even more acute, and there would be no playing fields. Worse, Redcliffs Park would have been taken for no reason. · Redcliffs Park is used more and more every week. The Coastal Pathway brings cyclists, roller skaters, walkers and joggers to the Park in increasing numbers. The Fun Run brings hundreds at once a year, the Park is used by school sports in the weekend, and every single day by children playing in the park, by families picnicking, and by families kicking a ball around. There are far too few green spaces. To take one for a school, beside the ocean, particularly when it is unnecessary, is not only wrong but would be a historic mistake. <p>The Proposal fails to consider the three obvious alternatives:</p> <ol style="list-style-type: none"> 1. Returning the school to the existing school on the current site; 2. Rebuilding the school on the current site; 3. Moving the school to another site such as Barnett Park. <p>A review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the Greater Christchurch Regeneration Act 2016 (GCR Act).</p>	
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Released by the Minister for Greater Christchurch Regeneration

		<p>We, therefore, request that</p> <p>i) you reject or place on hold the exercise of power under section 71 of the GCR Act, and</p> <p>ii) request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site.</p>	
332	No	<p>Dear Minister,</p> <p>I wish to express my opposition to the proposal to move Redcliffs School to Redcliffs Park. Redcliffs Park has been a valued seaside community park for over a hundred years and continues to attract new users with the new cycleway. As the Board of Trustees of Redcliffs School said in October 2016 submission, “The Board’s view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible. The Board’s view is based on the fact that there are no objective reasons why the school should not return to the Main Road site.” Though the Board’s view changed following the decision by the then-Minister of Education, Hekia Parata to move the school to Redcliffs Park, the facts have not:</p> <ul style="list-style-type: none"> • Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a re-location to any other site. • There is simply no need to move the school. Engineering reports have shown that the site can easily be made safe. The site has shown to be suitable by a school for over a hundred years. It can be used for another hundred years. It is much higher than Redcliffs Park and thus has built in resilience to sea level rise. It is much less at risk from a tsunami, and there is no risk to children from the estuary. • The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be 	

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		<p>managed by the Board, school management team and staff, and the school community.</p> <ul style="list-style-type: none"> • It is clear from consultation documents that the Ministry of Education consultants were only thinking of a tsunami generated from Chile. Since the Kaikoura earthquake, we now know that a tsunami can be generated by a Canterbury earthquake, and can hit the shore in minutes with no warning. • The park is right beside the estuary. The outgoing tide cannot be swum against. Hundreds of children attending the school, and toddlers accompanying their parents, will be at risk of drowning in the estuary. That risk cannot be ameliorated, and is completely unnecessary. • Sea level rise of even a metre – which is absolutely inevitable – would obviously drown Redcliffs Park and mean that the school if relocated, would be perched overlooking not a park but the estuary. The danger of drowning would be even more acute, and there would be no playing fields. Worse, Redcliffs Park would have been taken for no reason. • Redcliffs Park is used more and more every week. The Coastal Pathway brings cyclists, roller skaters, walkers and joggers to the Park in increasing numbers. The Fun Run brings hundreds at once once a year, the Park is used by school sports in weekend, and every single day by children playing in the park, by families picnicking, and by families kicking a ball around. There are far too few green spaces. To take one for a school, beside the ocean, particularly when it is unnecessary, is not only wrong, but would be a historic mistake. <p>The Proposal fails to consider the three obvious alternatives:</p> <ol style="list-style-type: none"> 1. Returning the school to the existing school on the current site; 2. Rebuilding the school on the current site; 	
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		<p>3. Moving the school to another site such as Barnett Park.</p> <p>A review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the Greater Christchurch Regeneration Act 2016 (GCR Act).</p> <p>We therefore request that</p> <ul style="list-style-type: none"> i) you reject or place on hold the exercise of power under section 71 of the GCR Act, and ii) request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site. 	
333		<p>As a resident of Beachville Road, Redcliffs, I am concerned about the proposal to place Redcliffs School onto Redcliffs Park nearby. I do not live close enough to that space to be disturbed by a school itself with the increased traffic flow and noise, I feel most noise is happy noise. My concern is about the unsuitability of the land for a school. It is used well as a park for sports when the weather is suitable, although often there is surface flooding. The main concern I have is in case of an emergency such as a tsunami or major storm. Along this stretch there is a high risk for flooding is severe storms and much of the soil is already affected badly from dried liquefaction and sandy. The park area is not very large either, unsuitable for too many structures, and there is almost no shade from hot sun. In the case of flooding or emergency school pupils would have further to go to escape to higher ground and traffic would be impeded 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.</p>	

		There also is many homes surrounding the field where property values would be decreased, although my main objection is the safety factor. Please reconsider the proposal. The current location of Redcliffs School on Main Road would be preserved and possibly classrooms relocated or rebuilt closer to the road down the front field there. If under some rare circumstance the nearby cliff becomes a worry. Thank you for this opportunity to put my case.	
334	Yes	But - Better option is still a return to current school. Rezoning is better than losing a school.	
335	No	Redcliffs Park used to be a dump. Who knows what's under the ground. In wet weather the whole area becomes a lake. Redcliffs school should be re-instated on the main road. Property moving would be a huge waste of taxpayer's dollars!	
336	No	The CCC and Environment Canterbury have expressed "concerns" about the siting of the new school at Redcliffs Park. To my knowledge those concerns have not been enumerated but I would imagine they will be cantered on flooding and tsunami risk? Why then is the land swap not abandoned on these two factors alone? We're talking here about children's (and adults) lives being put a risk. How can those two above organisations live with that risk on their minds if the swap goes ahead? Canterbury Regional Council "Consultation on the long term plan 2018-2028, Page 10, on "Hazards, Risk and Resilience", under "Flood protection", states "Flood protection and control infrastructure is a big-ticket item in our budget and it is necessary in order to protect billions of dollars of assets and human lives from the risk of flooding" In the same document under "Coastal Environment Hazards" it states, "While many would think of tsunami risk when thinking about coastal hazards, slower acting hazards such as sea level rises due to climate change and coastal erosion from storms and weather events are an	

		area of risk also" In the interest of human lives surely we should be eliminating any risk. The decision of the previous Minister of Education to build a new school on a site that is known to be flood and tsunami prone was simply ill conceived and wrong. The new school could be built on the existing site, right across the sites, where there is no risk whatsoever	
337	Yes	I am writing in support of the proposal to use Section 71 of the GCG 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. This is not an easy proposal to support, because the original Redcliffs School site should never have been abandoned. However, given that it is now nearly April 2018, it is critical that the school is returned to its own community in the shortest possible timeframe, and the previous decisions that have been made mean that this proposal is the only one that can deliver that outcome. The passage of time has made this the only viable outcome. It is hard to express in words how important this school has been to the heart of our community. Particularly post February 2011 earthquakes. It has provided security, friendship, excellent education and support for the Redcliffs community, hit particularly hard by the quakes. It has been the continuity necessary for local residents in order to retain their sense of place – despite being located in three different places since that first quake. It is extraordinary how the Board, Principals and staff have maintained an extremely high level of professionalism and motivation for their students and families. They deserve our utmost admiration and support. To quote from the 25 June 2017 submission of the Board of Trustees in regard to the land swap “The return of Redcliffs school to Redcliffs has always been the Board of Trustees’ primary objective, backed by the overwhelming support of the Redcliffs community. It is with this mandate, therefore, that we support the proposed land swap to	

		<p>enable our move to Redcliffs Park, which we believe will make an excellent alternative location for our school.” And further “We do feel like we’ve moved heaven and earth to keep our school in Redcliffs, and now it’s time to go home, home not only to a quality, local school, but to a community resource in a beautiful and inspiring location.”</p> <p>I totally agree with their comments. It is well past time to make the decision, get the build of the new school underway, and allow this strong, well connected and proud Redcliffs community to get on with their lives. They have been left in limbo for far too long and yet they have maintained the highest level of educational achievements and maintained a strong school and community culture. They deserve to have this decision made soon and I look forward to the opening of the new school, back in the heart of the community where it belongs.</p>	
338	Yes	<p>However - I believe the current school could still be used. Contain rock face with meeting - move classrooms forward. Ridiculous that this current school and buildings will not be used.</p>	
339	No	<p>I am writing to expressly state that I oppose the proposal of Redcliffs School to move to Redcliffs Park. We have lived near Redcliffs park in the same home for almost 19 years. We have four children aged 2, 5, 9 and 12. While I believe that every suburb should have a local school, I feel very strongly that the Redcliffs Park should not be used for this purpose, particularly since the original site for the school is deemed safe to use for the public and some of the infrastructure (buildings and playground) are going to be retained.</p> <p>The situation has been extremely traumatic for the whole</p>	

	<p>community. Since the earthquakes we have had to deal with damage and disruption from the quakes, flooding, uncertainty and infrastructure reconstruction (causeway, sewage etc.) for years now. So many of the retired folk and others in the area have had to have their homes fixed/rebuilt or are still struggling with insurance (our house is still very damaged!). Now we have to deal with further upheaval of losing a park that has provided refuge to many in these tricky times. The old school site has been shown to be safe (both physically and psychologically) and it would be perfectly safe with some work on the cliff (this will need to be done anyway).</p> <p>A new school on our beloved park site is a mistake. The park is fine for recreational use, however it is prone to flooding. With climate change and sea level rise, this build will be at high risk from Tsunamis. The children would be at risk as well when unattended before and after school as they would be exposed to king tides if they go exploring at the estuary. There have been drownings in the area in the past. The previous Minister of Education, Hekia Parata's decision to move the school to Redcliffs Park was made without local understanding and knowledge. The previous school site is far more fit for the purpose of have a school than Redcliffs Park.</p> <p>Over the years the community fought to keep the school. Numerous hours were put into fighting the possibility of closure. Now that the decision to keep the school has been made. People appear to be interested in pushing ahead with a site that is not the best option for the long term. It would be much better to have a school rebuilt or fixed on the original site for multiple reasons: it is on higher ground and at less risk of flooding, it is more sheltered from high winds, safer in terms of proximity to the estuary and King tides and so forth.</p> <p>This whole process has been exhausting for the individuals involved</p>	
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		<p>and the community as a whole. The community does not have the funds to follow through with a judicial review. A number of us have spent countless hours writing to numerous officials, but so far with no results. So, here I would respectfully like ask that a review of the policy decision must be considered as one of the alternatives referred to in section 65(2) (d) of the Greater Christchurch Regeneration Act 2016 (GCR Act).</p> <p>I therefore request that</p> <ul style="list-style-type: none"> i) you reject or place on hold the exercise of power under section 71 of the GCR Act, and ii) request the Minister of Education to conduct an independent review of the policy decision and its supporting documentation to relocate Redcliffs School to an alternative site. <p>I would be grateful if you could offer our little community some stability and sense of post-quake closure by making a decision to keep Redcliffs Park as a park and recommend that the original school site be reconsidered by the Ministry of Education under the new government.</p>	
340	No	<p>I would like to give feedback on the Redcliffs School Relocation Proposal.</p> <p>I oppose the proposal for the following reasons:</p> <ul style="list-style-type: none"> - Redcliffs Park is not a suitable site for building a new school, the site is within the coastal inundation zone. Current sea level rise studies indicate that the site would need extensive coastal defence work to maintain the use of the site as a school within 30 years. - The site of the existing school is a far more suitable long term site, 	

		<p>the rock fall issues can be easily mitigated. A new school built on the existing site would have a much longer existence than 30-50 years.</p> <p>I believe Redcliffs needs a school, but building one in Redcliffs Park would be ignoring the issue of sea level rise. It would be a very short term solution and in the long term, a huge waste of money.</p>	
341	No	<p>2 April 2018</p> <p>The Minister The Department of the Prime Minister and Cabinet Greater Christchurch Group</p> <p>Dear Minister</p> <p>REDCLIFFS SCHOOL SECTION 71 GCR ACT PROPOSAL SUBMISSION</p> <p>You have sought submissions by 5pm on 3rd April 2018.</p> <p>Do I agree with the proposed use of Section 71 of the GCR Act 2016 NO</p> <p>My point of view is not on the technical issues but from an observation of impact on issues possibly overlooked.</p> <p>WHY CHANGE what has worked perfectly - until the Quake caused doubt on safety of the sight. Quite rightly a thorough investigation ensued and safety has now been resolved on the original school site.</p> <p>The existing school buildings are already available on existing school site virtually ready to move into now.</p>	

	<p>CONSTRUCTION PLANS FOR A NEW SCHOOL: I was told the cost to prepare these plans has gone too far ahead to discard.....But why discard? Why not have the plans available for any new school in any part of New Zealand These plans do NOT need to be discarded. However if it is considered the old school needs a new design why not build these new plans on the existing school site.</p> <p>COST OF REBUILDING ON REDCLIFFS PARK IS UNNECESSARY: All amenities and all infrastructure already exist on the existing school site. So much cost will be involved changing the roads, the pedestrian crossings Landscaping -signage etc. The present site does not have any roading intersections. The loading and off-loading of pupils with the present pedestrian crossing is convenient and works well.</p> <p>HEALTH OF FAMILIES: We live opposite the existing school and confirm it exists in a micro climate sheltered from all the weathers experienced in Christchurch.</p> <p>It is understandable that weather would not be obvious unless you experience the area. Whilst it is warm and relatively windless at the school – try walking to the causeway and it is like walking into another climate. The easterly winds can be extremely bitter cold and Redcliffs Park is 100% exposed to this and the southerly winds. It is very likely that children will suffer from winter colds and flu which will pass to other family members and the transfer to Redcliffs Park will be highly criticized and regretted.</p> <p>NEW ZEALAND FINANCES: We are constantly reminded of the “blow out” results on most projects. Whatever cost has been assigned to the new school</p>	
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		<p>building at Redcliffs Park one can expect the same outcome..."blow out of budget" which has 2 outcomes-</p> <ul style="list-style-type: none"> a. The final cost will exceed all predictions and who will pay? b. Funding for a new school on a new site denies more important issues facing Christchurch. <p>Therefore there seems no reason not to reconsider the intention to re-locate be changed to re-turn to original site.</p> <p>I am pleased to have the opportunity to comment and thank you.</p>	
342	No	<p>The current Redcliffs school site is by far the best location for the school from both a safety and practical point of view. This has been proven in the many reports provided by the community. We live overlooking the existing school. Parata had either a hidden agenda or her pride wouldn't allow her to go back on her decision to move the school. The school however is essential to the community.</p>	
343	No	<p>Because if proposed land swap goes ahead it then leaves the way open for existing school location to become available as a skate park!! Most undesirable! Re school to Redcliffs Park - Not totally satisfactory for various reasons already debated</p>	
344	No	<p>I object to this land swap on the grounds that it is unnecessary and a poor investment in time and energy. The current site for a school has been chosen by reports to the Ministry as the best. If the Ministry wants to build a new school, please do it there.</p> <p>The Redcliffs Park proposed site is on a floodplain, is a beautiful park, and shouldn't be lost to the community as one of the only urban sea-side parks Christchurch/Otautahi has.</p> <p>I believe this process should go through the RMA. We're not in a disaster any more, this act is not relevant to this important</p>	

		community decision. We need proper process to deliver all sorts of aspects about using a much more low-lying site, let alone the loss of a cherished park.	
345	No	<p>In my opinion Redcliffs Park is not a suitable site for the Redcliffs School and should not be rezoned for a school for the following reasons.</p> <p>The Redcliffs Park is a higher hazard risk than the current site. The Redcliffs Park is in the Coastal Inundation Zone. New residential development would not be allowed in this area. Why would the development of a school be permitted? The relocation of the school would increase the potential risk to children and teachers for their safety and wellbeing. The Redcliffs park has the potential for liquefaction. There will be considerable traffic congestion turning from Beachville Rd in to the Main Rd or the Causeway.</p> <p>In the event of an emergency, it would be extremely chaotic evacuating the site and for traffic turning into The Main Rd or Causeway. The low lying playing fields are very wet in the both summer and winter as they are impacted by the high water table due to proximity to the estuary. Too boggy for school playing fields. Any raising of the land with hardfill would have negative consequences for the neighbours. The old school would be mostly demolished so there will be more waste in the landfill.</p> <p>Our home, in Celia St shares 80% of the eastern boundary with the Redcliffs Park. We bought this home after our Clifton Tce home was red zoned. We were attracted to the lovely unencumbered park side site and paid a premium for this privilege. We did not ever consider that a school could be built there which would take our park, impact our view, our peace and devalue our house.</p> <p>I urge you to not proceed with the change of designation and then, hopefully, the Redcliffs School could return to the original much more suitable site on The Main Rd saving our country several</p>	

		million dollars. Please register my name with a NO for the change of designation.	
346	Yes	Really want a new school site	
347	No	I am against the proposal to shift Redcliff's school to Redcliff's park. The CCC has done extensive research and has come to the conclusion that due to flood hazards the site (a landfill) is not sustainable to be used for school purposes in the medium to long term. Presumably if the existing school site is safe enough to be utilised as an open space natural zone for recreational purposes - why is not safe enough to be re-instated as a school? The cost of changing sites will be considerable and the government should be aware that the chch ratepayer is already burdened through the re-build. It is time to show some common sense and change a flawed decision made by the previous government. Returning the school to its original site will be a safer and more sustainable long term option. PS I walk on the park every day and witness first hand know easily it floods.	
348	No	Listen to the older residents of Redcliffs to hear how the proposed site was tidal, cold, wet. Original site of school absolutely safe. Looking 50 years out from building a school and saying that's all it has to last Govt speak. We live here, our children schooled here. Bringing school forward still plenty of room. Name not to be published.	
349	Yes	Because our community needs a local school, sooner rather than later, an because the MOE has indicated that this is the only place they would site a school	

350	No	You know all this stuff comes under the heading of (Much ado about nothing) I have lived in this district for 30 years plus - the community needs the school and I think it is better on its original site - get on with it. This whole process reminds me of a film - The pecking order	
351	Yes	I support this process however the MOE have not given the community an alternative option to return to the original site, despite its proven safety	
352		Please take note of what the city council is saying. So what is going to happen in 50 years - A tsunami to drown all children? How stupid to say go ahead with a school in a swamp	
353	No	I object to this land swap on the grounds that it is unnecessary and a poor investment in time and energy. The current site for a school has been chosen by reports to the Ministry as the best. If the Ministry wants to build a new school, please do it there. The Redcliffs park proposed site is on a floodplain, is a beautiful park, and shouldn't be lost to the community as one of the only urban sea-side parks Christchurch/Otautahi has. I believe this process should go through the ROMA. We're not in a disaster anymore, this act is not relevant to this important community decision. We need proper process to deliver all sorts of aspects about using a much more low-lying site, let alone the loss of a cherished park.	