

The Future of Redcliffs School

Redcliffs School Board of Trustees

This submission is in response to:
Hon Hekia Parata's interim decision to close Redcliffs
School.

31 March 2016



Through Challenge and Encouragement Comes Success

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1. Introduction

- 1.1 The Minister of Education, Honourable Hekia Parata, has made an interim decision to close Redcliffs School based on advice received from the Ministry of Education in the Education Report dated 9 November 2015 and appendices.
- 1.2 In this submission the Redcliffs School Board of Trustees (Board) presents arguments in favour of the school remaining open, including by providing new information.
- 1.3 This includes:
 - a. new technical advice which directly addresses the concerns that have been raised in the Education Report and the Minister's handwritten notes; and
 - b. new expert opinion that emphasises the importance of the school to its community, especially in the context of earthquake recovery. This information details the likely negative effects of closure on the social capital of Redcliffs, and the likely adverse outcomes for residents in terms of health, wellbeing and education.
 - c. new expert opinion confirming the negative transport effects of closure.
- 1.4 The Board considers that in light of this new information, the Minister's concerns have been addressed and the final decision must be that Redcliffs School should remain open and should return to its Main Road site.
- 1.5 The Board seeks continuing engagement in relation to these arguments during their consideration and evaluation. The Board understands that in presenting these (as provided for in section 154 Education Act) it is engaging in a process of submissions which will be followed by evaluation. In particular it seeks engagement between its experts and all experts whom the Minister may consult. On expert issues it proposes that the Minister invite experts to now confer and agree so that she may be guided correctly on expert issues.
- 1.6 The Board respectfully draws to the Minister's attention that the community and especially the school community is united in seeking to retain their school. This support has continued through five years of post-earthquake experience (during which there have been further earthquake experiences). This support would not exist if there were any actual risk from return to the school site. The Board believes that it is striking that those who are most risk averse and have the actual local experience are so completely committed to retaining this school.

2. Executive Summary

- 2.1 Framework for decision:
 - 2.1.1 In considering the decision under section 154 Education Act, the Minister must be satisfied, on the basis of appropriate advice and evidence that, for the reasons she has given, it is necessary to close the school.
 - 2.1.2 The Board considers that the reasons cited by the Minister are insufficient for her to be satisfied that the school should close. The Minister's concerns about the suitability of the Main Road site have been addressed by expert advice. In particular the

geotechnical advice from Eliot Sinclair confirms that mitigation measures can be implemented to ensure negligible risk of disruption.

- 2.1.3 Even if the expert evidence were sufficient to confirm that the Main Road site is unsuitable for a school, the Board considers that the Minister must then further explore suitable alternative sites. To date, only preliminary investigation of alternative sites has been undertaken.
- 2.1.4 The decision also falls to be considered in the context of earthquake recovery in Christchurch, which means the relevant framework is much wider than the Education Act. The Government's legislative and policy response to both earthquake recovery and to regeneration in Christchurch emphasise and prioritise the need for social recovery, and recognise the importance of community wellbeing, empowerment and resilience in achieving this. A cross-agency approach is required.
- 2.1.5 The earthquake recovery context is a key consideration when considering the negative effect of closure on the Redcliffs community (Section 5 below).
- 2.2 Mitigation of the Main Road site:
 - 2.2.1 The scope of the original mitigation works proposed by MWH did not include any consideration of potential disruption, instead focussing on design of mitigation measures sufficient to make the site sufficiently safe for occupation by a school.
 - 2.2.2 In response to concerns first raised by the Minister in the proposal to close the school, the Board engaged AECOM, which considered potential disruption for the first time, concluding that the MWH proposal would prevent disruption of the school in all but a large magnitude earthquake. Despite this, concerns remained and an interim decision was made to close the school.
 - 2.2.3 The revised solution recommended by Eliot Sinclair is specifically designed to address disruption and provides a solution where the potential for disruption is minimised to negligible.
 - 2.2.4 The Board notes that no disruption tolerance or threshold has been referred to, against which the Main Road site has been determined to be unsuitable and that requiring zero tolerance for disruption would not be appropriate or realistic. No comparative analysis been carried out to compare the potential exposure of Redcliffs students to disruption at the Main Road site against such exposure at Sumner or Mount Pleasant Schools. In the absence of a clear disruption tolerance, against which the potential disruption arising from a decision to close and a decision not to close can be assessed, the Board considers the Minister cannot be satisfied that the school should be closed for this reason.
 - 2.2.5 The other sources of uncertainty related to the Main Road site cited by the Minister in the interim decision, including regulatory concerns, demolition of cliff-top houses, questions as to ongoing responsibility and diversion of resources have now been addressed. None of these issues present a significant barrier to the implementation of the mitigation measures as recommended by Eliot Sinclair.
- 2.3 Negative effect of closure on the community:
 - 2.3.1 Closure of the school would deprive the community of a quality educational facility with its associated history and tradition and would have an associated negative impact on the future demographic of the Redcliffs community.

- 2.3.2 In addition, because the proposal is for closure, not merger, the effect would also be the loss of a unified school community. The current school community would be split between Sumner and Mount Pleasant schools.
- 2.3.3 The expert evidence is clear that schools are critical to connected and thriving communities, which in turn are key to enhancing recovery from disasters such as the earthquakes. The school has served an important purpose as an informal support network in the post-earthquakes and recovery periods. Its loss now would jeopardise the ability of the community to recover effectively.
- 2.4 Negative transport effects:
 - 2.4.1 The joint expert statement outlines key negative impacts of closure on traffic, including financial cost as well as an associated reduction in active transport options, which will have a negative effect on health. In addition, due to the roading network and geography, increased congestion would result which will inevitably increase safety risk. Importantly, the experts consider that further analysis is required.
 - 2.4.2 The Board emphasises that the significant additional distance which many Redcliffs students would be required to travel is an important factor in the decision. It argues that the proposed enrolment zones for Sumner and Mount Pleasant schools would be contrary to the intention in the Education Act that students can attend a reasonably convenient school.

3. Framework for Decision

3.1 Education Act

- 3.1.1 The decision falls to be considered under section 154 of the Education Act 1989 which deals with closure of schools. Under this section the Minister may, if satisfied after consulting with the Board, that a school should be closed, ask the Board for any arguments in favour of it staying open. After considering all arguments received from the board, the Minister may close the school.
- 3.1.2 What would have to be proven for closure to be directed under the Act is that there is evidence which is sufficient to prove to and so satisfy the Minister that, for the reasons she has identified, it is necessary to close the school. In making this assessment, the Minister must consider and weigh **all** matters including arguments and evidence against closure.
- 3.1.3 The Board does not consider that the Minister can be satisfied, on the basis of the current advice and evidence received, that the reasons she has identified make it necessary to close the school and that there are strong reasons and facts which support its continuation. This submission presents arguments, and evidence in support of those arguments, which demonstrate that the school should not be closed.
- 3.1.4 The Board notes that, to date, the decision in relation to Redcliffs School has focused on problems said to arise in respect of the school's Main Road site. As a result the consideration has been whether the Main Road site is suitable, rather than the real issue under the Act as to whether the school itself should close. The Board argues that the school site can be made suitable with mitigation in place. However even if, following appropriate expert conferral and peer review, this is demonstrated on the evidence not to be the case, then the Board

considers that an alternative option for its future will need to be considered¹. To date only preliminary consideration has been given to this.² Without this occurring the Board does not consider that the Minister can be satisfied that the school (as distinct from the site) should close.

- 3.1.5 The Board also notes that the Christchurch City Council advised the Ministry in September 2015 that Barnett Park is not an option *“but Redcliffs Park could be if required and we are open to a discussion”*³. The Ministry’s cover letter in response to the Board’s information request which provides this email advises that *“Redcliffs Park is not considered viable as it is within Coastal Inundation Hazard Zones 1 and 2, which indicates that the site could be subject to flooding. Note that part of Sumner school site is within the same zone although there are obvious differences between an existing school site and a proposed one. There are no further emails or reports on this as it was dealt with during the work done by the Board and the ministry in 2012 and 2013.”* However, this statement is made without further input or advice from Council.

3.2 Earthquake recovery context

- 3.2.1 The Board emphasises that the Minister’s decision regarding closure should be approached having regard to the wider context of earthquake recovery, rather than simply as a closure decision under the Education Act. It is a decision which will affect earthquake recovery in terms of provision of education and in terms of psychosocial recovery. As such, it falls to be considered under the relevant earthquake recovery and regeneration framework.
- 3.2.2 The Shaping Education policy document (Directions for Education Renewal in Greater Christchurch)⁴ is part of the Recovery Strategy, which was developed under the Canterbury Earthquake Recovery Act 2011. This policy deals with the recovery of the education system in greater Christchurch and supports other programmes under the Recovery Strategy, including social recovery.⁵ The draft⁶ and final⁷ transition plans which deal with the transition phase from CERA to Regenerate Christchurch, and the Greater Christchurch Regeneration Bill, also reflect the importance of communities in the recovery phase.
- 3.2.3 The relevant legislative and policy framework for this earthquake recovery context is set out in detail in Appendix 1 to this submission.
- 3.2.4 The documents referred to demonstrate that the Government’s legislative and policy response to both earthquake recovery and to regeneration in Christchurch emphasise and prioritise the need for social recovery, and recognise the importance of community wellbeing, empowerment and resilience in achieving this.⁸
- 3.2.5 This is referred to specifically in terms of the provision of education and health services, which are the two critical sectors through which the Government can assist communities to work towards social recovery. The need to support local communities, which provide

¹ As noted at paragraph 53, Page 14 Education Report dated 6 March 2015 (proposal for closure).

² Referred to at paragraphs 54-58 Education Report dated 6 March 2015, which referred to an investigation by the Ministry into possible alternative sites. This refers only to Barnett Park and the possibility of the school remaining on VADEC site

³ Email from Simon Battrick, Development Manager at Council, 10/9/15, doc 32 of the documents released to the Board pursuant to its OIA request of 21 December 2011, by cover letter from Katrina Casey of MOE, received on 11 February 2016. Note this is expressed as “informal feedback”.

⁴ Appendix 2

⁵ Appendix 3 and Appendix 4

⁶ Appendix 5

⁷ Appendix 6

⁸ As detailed in Appendix 1

purpose and a sense of identity in difficult times, is a consistent theme. In the regeneration phase in particular, it is recognised that communities should be listened to in shaping and leading their own recovery.⁹

- 3.2.6 The Board argues that decisions made by the Government in relation to education in the recovery and regeneration phase must take into account this wider context and must recognise the importance of local communities as providing much-needed support to individuals as they progress towards recovery.
- 3.2.7 Decisions which relate to closure of schools will always affect local communities. However, where such decisions are made against the background of traumatic events such as the Canterbury earthquakes, the implications are much greater and have much wider and long-term consequences for those communities.
- 3.2.8 A decision to close Redcliffs school will have long-term negative impacts on a community which:
 - a. Has been unified as a group because of the difficult times it has been through together and the challenges it has faced;
 - b. Has provided an informal support network for teachers, parents, families and the wider Redcliffs community, providing connectedness and a sense of purpose and place since the earthquakes;
 - c. Has continued to thrive and achieve in the face of adversity.
- 3.2.9 The effect of closure would affect not only the provision of education to Redcliffs students, it would also split a community in half by creating a new enrolment zone, meaning that current Redcliffs students would be zoned either for Sumner or Mount Pleasant schools. They would not be able to choose which of these two schools they could attend. The implications for the community are more drastic than would arise from a merger of schools, which would mean an existing community could remain together, albeit as part of a larger school community.
- 3.2.10 These issues are further explored in Section 5 below.

4. Mitigation of the Main Road Site

4.1 Potential disruption

- 4.1.1 Concerns about potential disruption were first raised with the Board by the Ministry of Education in its Education Report dated 6 March 2015, which accompanied the proposal for closure.
- 4.1.2 This report acknowledged that MWH had concluded, based on its modelling, that the majority of the Main Road site could be made safe for use as a school by reducing the site area and constructing an earth bund on the boundary closest to the cliffs. The Education Report also noted that according to the modelling this would reduce the risk from rockfall to the level of “background risk” that all New Zealanders are exposed to and that this is also the level of risk that GNS suggests is acceptable for a school site.¹⁰

⁹ As detailed in Appendix 1

¹⁰ Paragraph 4 Executive Summary Education Report 6 March 2015

- 4.1.3 The report referred to MWH's recommendation that if Redcliffs School is returned to site with these mitigations in place, an operations and maintenance plan be established to define the response required after future rockfall events.¹¹ It further stated that if there was a future event that necessitated a reassessment to determine whether the site remained within the acceptable risk level, the school would be unable to operate on the site while that assessment and any required repairs, removal of rock or other mitigations were carried out.¹² Finally, it noted that such an eventuality would cause further disruption to teaching and learning and may affect the ongoing viability of the site.¹³
- 4.1.4 It is important to note that the Ministry did not instruct MWH to carry out the recommended operations and maintenance plan, despite agreeing this would be required.¹⁴ It is unclear on what basis the Ministry made the comments referred to above that the school would be unable to operate on the site while assessments and any required repairs were carried out.
- 4.1.5 The Board commissioned AECOM to do a preliminary investigation of events which might cause disruption on the site¹⁵. This referred to a meeting of technical experts on 5 May 2015 which considered whether the group expected the proposed MWH solution to prevent rockfall from disrupting the school. The report referred to agreement by the technical experts that the engineering solution proposed by MWH was appropriate, robust and conservative and would prevent disruption of the school in all but a large magnitude earthquake, which would almost certainly leave other areas of Christchurch with significant damage. This meant Redcliffs is no more vulnerable or unsafe than other buildings and schools in the region.¹⁶
- 4.1.6 However, the concerns regarding potential disruption persisted and are reflected in the Education Report of 9 November 2015 and the Minister's interim decision to close the school. In letters announcing the interim decision, the Minister stated:
- "I have made this interim decision because I remain concerned about the potential for future disruption to education provision if the school returns to the Main Road site. While your Board has argued that circumstances that could give rise to potential disruption are extremely unlikely, advice from technical experts has shown that these concerns cannot be ruled out. I am also concerned that the Ministry's continued consideration of the situation, as well as additional information from technical experts, has further highlighted the complexities and uncertainties around the ongoing monitoring and maintenance required if the school returned to its site."*¹⁷
- 4.1.7 In her handwritten notes accompanying the Education Report dated 9 November 2015, the Minister stated:
- "After considering all of the factors canvassed by the Board, the community and the consultant experts, I am not persuaded that the provision of education would go undisrupted if the school was returned to the Main Road site..."*
- 4.1.8 In her letter referred to above, the Minister also stated:

¹¹ Paragraph 5 Executive Summary Education Report 6 March 2015

¹² Paragraph 6 Executive Summary and paragraph 27, Education Report 6 March 2015

¹³ Paragraph 6 Executive Summary Education Report 6 March 2015

¹⁴ Paragraph 27 Education Report 6 March 2015

¹⁵ AECOM Report: Rockfall Risk to Redcliffs School 17 June 2015, Appendix A to Board's submission

¹⁶ AECOM Report 3.0 Conclusions, page 11

¹⁷ Letter Hon Hekia Parata to Craig Jones and to parents/caregivers dated 25 November 2015

"Please be assured that no final decision about the future of the school will be made until I have considered any additional information provided by your Board".

4.2 Geotechnical: mitigation of disruption

- 4.2.1 The Board has important new geotechnical information to present to the Minister regarding the Main Road site, being a report from geotechnical engineers Eliot Sinclair¹⁸. The report includes a review of the geotechnical reports and opinions to date and specifically addresses the concern as to potential disruption. Eliot Sinclair recommends a new mitigation strategy that will reduce the potential for disruption on the site to a negligible level.

Eliot Sinclair mitigation plan: site safety

- 4.2.2 The highly conservative nature of the mitigation proposed by Eliot Sinclair, placing the bund and operational school boundary on the 26 degree contour, provides even further assurances of safety on the site. This is demonstrated by Eliot Sinclair's performance criteria as follows¹⁹:

- Risk of fatality within the school grounds shall be nil
- Establish a revised school boundary at a conservatively located set-back
- No rock will cross the revised boundary

Eliot Sinclair mitigation plan: potential disruption

- 4.2.3 The report also sets a series of performance criteria designed to reduce potential disruption to a negligible level²⁰:

- Minimise risk of rock impacting or damaging the bund
- Minimise risk of rock requiring clearance from behind the bund (in the catch area)
- Minimise monitoring requirements
- Provide conservatively established ample storage capacity such that in the event of multiple large volume rockfall events, the rock is well contained in the catch area, and there would be no need for detailed reassessment of the slope stability.

- 4.2.4 Based on the Eliot Sinclair report, the Board considers that the issue of potential disruption has been fully addressed and the Minister can be assured that, with the mitigation measures in place, the Main Road site will be suitable for education on a long-term basis.

4.3 Disruption tolerance/threshold

- 4.3.1 In raising the potential for disruption, the Ministry has not referred to a threshold or tolerance level for disruption, against which the potential disruption arising from a return to the Main Road site has been measured, and has been determined to be unacceptable.
- 4.3.2 As noted in the Eliot Sinclair report, uninterrupted education cannot be provided in any part of New Zealand, largely due to our exposure to multiple natural hazards, including

¹⁸ Eliot Sinclair Report 30 March 2016, Appendix 8

¹⁹ Eliot Sinclair Report 30 March 2016, Appendix 8, page 14

²⁰ Eliot Sinclair Report 30 March 2016, Appendix 8, page 14

earthquake, floods and storms. Disaster planning by relevant agencies therefore includes planning and preparedness for multiple types of disruptive events.²¹

- 4.3.3 Eliot Sinclair considers, by reference to planning documents by such agencies, that it is not realistic or achievable to set an expectation or a threshold requiring uninterrupted education. They state that this is inconsistent with planning and preparedness advice for schools recommended by central and local government agencies, and with the NZ Building Code and the MOE's school design guidance.²²

Comparative risk of disruption

- 4.3.4 In the absence of a benchmark or tolerance level for disruption to education, it is not possible to assess the comparative risk of disruption between the Redcliffs School site, and the Mt Pleasant and Sumner school sites which the majority of Redcliffs students would attend if the school is closed. The Ministry of Education has confirmed that no such comparative analysis has been undertaken.²³
- 4.3.5 MWH was asked by the Ministry of Education in 2014 to summarise the relative vulnerability to various natural hazards faced by the Redcliffs school site, particularly to seismic related hazards, compared to other Christchurch schools.²⁴ This report considered rockfall, tsunami and ground deformation. It concluded:
- a. With the mitigation measures in place, the risk from rockfall is considered to be no higher on the school grounds than on any site remote from the Port Hills, with an Annual Individual Fatality Risk of 10^6 , which is the background level of risk that all New Zealanders face;²⁵
 - b. There is potential vulnerability of people travelling on the Port Hills Road network, including the purple cliff collapse risk zones which extend onto the main road that links Redcliffs and Sumner.²⁶ This hazard is present on many roads in the Port Hills network and is not unique to people travelling to and from the school.
 - c. Based on modelling available, nearby schools, including South New Brighton, Sumner and Van Asch schools have a higher level of vulnerability associated with tsunami than Redcliffs School.²⁷
 - d. The Redcliffs School site has a similar level of vulnerability concerning ground deformation as much of Christchurch and therefore many of the schools in Christchurch. Schools constructed near TC3 areas will generally have more vulnerability with respect to ground deformation than Redcliffs School and schools near rivers and other flat-land red zones will generally have the highest vulnerability around ground deformation.²⁸
- 4.3.6 However, the MWH report considered relative vulnerability or safety risk, not relative disruption risk. Despite no comparative analysis having been carried out as to potential for

²¹ Eliot Sinclair Report 30 March 2016, Appendix 8, page 9

²² Eliot Sinclair Report 30 March 2016, Appendix 8, page 9

²³ Letter of response from MOE to Board's request under Official Information Act dated 21 December, received 11 February 2016.

²⁴ MWH letter to Ministry of Education 5 September 2014 – Relative risk at Redcliffs School, Appendix 3 to Education Report dated 6 March 2015

²⁵ At Pg 3

²⁶ At Pg 3-4, referring to Figure 2-2

²⁷ At Pg 10

²⁸ At Pg 13

disruption, it must follow that the more susceptible a school to a particular natural hazard, the more susceptible it is likely to be to disruption arising from that natural hazard.

- 4.3.7 This comparative analysis is particularly relevant when considering potential disruption to Redcliffs students who would attend Sumner School if Redcliffs school closes, given the vulnerability of Sumner School to tsunami. In the case of Redcliffs School, the susceptibility to rockfall hazard would be fully mitigated by the mitigation measures proposed, as compared to the unmitigated tsunami and flood risk at Sumner School.
- 4.3.8 The MWH report did not consider comparative flood risk. However, the letter from the Ministry of Education in response to the Board's information request²⁹ notes that Sumner school is also in the Coastal Inundation Risk Hazard Zones 1 and 2 *"which indicates that the site could be subject to flooding, and which has implications for minimum floor levels."* Sumner school therefore has increased vulnerability to flooding than Redcliffs School's Main Road site.
- 4.3.9 The Board considers that the Minister cannot be satisfied, based on a concern about the potential for disruption, that Redcliffs School should close in the absence of such a comparative analysis. This is because there is no evidence that the potential for disruption to the education of Redcliffs students would be less if the school closes and they attend Sumner or Mount Pleasant schools. To the contrary, there is evidence that Sumner school is more susceptible to both tsunami risk and to flooding and therefore there must be significant potential for disruption to education at that school.
- 4.3.10 Further, the Board considers, based on the Eliot Sinclair report, that if the Minister is requiring to be satisfied that no disruption will occur, or that education will be completely uninterrupted, this is an inappropriate threshold for making a decision in respect of closure of the school. If this were the threshold being applied, it would be inappropriate to allow Redcliffs students to attend Sumner school for the same reason.
- 4.3.11 In addition, there has been no detailed analysis as to what is and is not tolerable disruption to education in terms of when, why or for how long such disruption arises. For example, a fire drill will disrupt education, but this is seen as a necessary and tolerable disruption due to its purpose and length of time. Events which could cause disruption may occur inside or outside school hours (approximately 1600 hours out of 8740 hours per year) and, in many cases, due to timing, may not have any effect, or only a minor effect on education. These points demonstrate further that, in the absence of any qualitative or quantitative analysis of disruption, it is unsound to use this as a basis for closure.
- 4.3.12 In summary, the Board argues that there is no evidence that any future potential disruption will be mitigated by closure. The nature of any disruption may be different if Redcliffs students are at schools further away from their homes, but that is not mitigation. In fact, the impact on Redcliffs students could be much worse if they are subject to disruption at a school which is outside their own neighbourhood and further away from their parents/caregivers and other family members.
- 4.3.13 The Board emphasises finally that the Eliot Sinclair report confirms that, with the mitigation measures in place as now recommended, the potential for disruption on the Main Road site will be reduced to negligible. A degree of potential disruption exists at many schools in New Zealand (for different and various reasons) and must always be managed to reduce any negative effects on education.

²⁹ Letter MOE, Katrina Casey, to Kent France, received 11 Feb 2016

4.4 Other sources of uncertainty

- 4.4.1 In addition to the Minister's concerns about potential disruption to education provision on the Redcliffs School site, a number of concerns about uncertainties have been raised in the November 9 Education Report, and in the Minister's handwritten comments on that report.
- 4.4.2 The Board has considered these concerns and has sought expert advice in order to provide certainty that the Redcliffs School site is suitable for the long-term provision of education.

4.4.1 Regulatory

4.4.1.1 The Minister has raised concerns regarding the ability of the proposed mitigation measures to gain regulatory approval³⁰

4.4.1.2 The Board has obtained a legal opinion from Tavendale and Partners regarding the need for resource consent to construct rock-fall mitigation measures on the Redcliffs site.³¹ They advise that resource consent would not be required for the construction of the mitigation works. This opinion was also confirmed by the CCC Planning Department at a meeting with Tavendale and Partners in late 2015

"At the School's request we attended a meeting with Nathan O'Connell (Planning Team Leader) at Christchurch City Council last year. Mr O'Connell confirmed our view that resource consent would not be required to establish a protective bund on the School site."

4.4.1.3 The Ministry had already received advice from other planning experts in May 2014 that confirms this position:

*"The entire Redcliffs School site is designated in the Christchurch City Plan for 'primary school' purposes. The proposed bund is located wholly within the designation. Provided works are in accordance with the purpose of the designation, the Requiring Authority (Minister of Education) is able to progress works through the submission to Council of an Outline Plan under s.176A. In my view the proposed bund (or alternatively rockfall fence) are clearly within the purposes of the designation as the works are integral to enabling the safe functioning of the Redcliffs school. Without the bund the School would presumably not be able to operate from the site i.e. could not fulfil the purpose of the designation."*³²

4.4.1.4 Correspondence between the Ministry of Education and the CCC in September 2015, confirms the position that an outline plan only would be required and not a full resource consent process³³.

4.4.1.5 With regard to the construction of the mitigation works, the MWH report states:

³⁰ Education Report, 9 Nov 2015, Page 2, Minister's handwritten note and referred to at para 50 by as raised by Ian Wright of CCC

³¹ Letter from Tavendale and Partners, Appendix 11

³² Letter from Planz Consultants, 5 May 2014, Appendix 12

³³ Email from CCC (Case Manager, Commercial Building Control to David Hobern, Programme Manager, CSR Programme, MoE 1 September 2015

“The bund is located beyond (i.e. further from the cliffs) the point considered acceptable for residential occupation so the risk to workers during construction of the bund would be less than for many homeowners”.³⁴

4.4.1.6 The correspondence between the Ministry of Education and the CCC also states, in relation to building consent for the bund, that the MoE could choose to apply for a discretionary exemption or for building consent from the CCC.³⁵

4.4.1.7 The Board is aware that in another case where mitigation works have been constructed as part of the CERA/CCC jointly funded Port Hills mitigation project, including an earth bund, a discretionary exemption was obtained³⁶.

4.4.1.8 Eliot Sinclair advises that its revised mitigation proposal is shorter, lower (2 metres high) and less complex to construct than the bund proposed in the MWH report.³⁷

4.4.2 Ownership of land

4.4.2.1 The Education Report dated 9 November 2015 states:

“While it is accurate that the neighboring properties are red-zoned, the majority of the cliff-face is privately owned by an owner who has not settled with the Crown. The Crown offer has now expired, adding further complexity to an arrangement to access the area behind the bund for reassessment, repair or debris removal.”³⁸

4.4.2.1 The Board’s understanding is that the majority of the cliff-face is now owned by the Crown, through CERA and the Department of Conservation.³⁹

4.4.2.2 In any event, the Eliot Sinclair report recommends a repositioning of the bund as previously designed by MWH, away from the school boundary. This means that a large amount of the area behind the bund is owned by the school and no “access arrangement” with a third party is necessary.⁴⁰

4.4.2.3 The Eliot Sinclair report also states that:

“Additionally, rock removal behind the bund is unlikely to be required, but access is provided should the need arise. These considerations have been taken into account in the design and location of the bund to specifically limit the requirement for maintenance. Concerns regarding ongoing maintenance are effectively eradicated due to the bund’s location and its low-tech form of construction and materials”⁴¹

³⁴ MWH Report August 2014, page 30

³⁵ Email from CCC (Case Manager, Commercial Building Control to David Hobern, Programme Manager, CSR Programme, MoE 1 September 2015

³⁶ Building Act Exemption BCN/2015/6199, 84 McCormacks Bay Road, Earthworks Bund

³⁷ Eliot Sinclair Report 30 March 2016, pages 26, 27

³⁸ Education Report 9 November 2015, paragraph 56

³⁹ As referred to in correspondence between CCC and MOE, Appendix 13

⁴⁰ See Eliot Sinclair Report 30 March 2016, Appendix 8, Figure B4, which details 4m wide service road, and page 16

⁴¹ Eliot Sinclair Report, 30 March 2016, Appendix 8, page 16

4.4.3 Demolitions of cliff-top houses

4.4.3.1 The Minister has raised concerns regarding the timeframe for the demolition of the remaining cliff-top houses, and how these demolitions might affect a timely return to site.⁴²

4.4.3.2 The Board has been in contact with the Demolitions Manager from LINZ who has confirmed that the two remaining houses directly above the school have been demolished. One house remains that is aligned with the Eastern school boundary but this house is set back some distance from the cliff edge and does not pose any realistic threat to the school. This remaining house has been settled with its insurer and demolition is set to commence imminently.⁴³

4.4.4 Timeframes for return to site

4.4.4.1 In her letter to the Board dated 25 November 2015 advising of the interim decision, the Minister states:

"...I am concerned about the uncertainty of the timing of a return to the Main Road site...It has been five years since the school was on its site, it could be several more years."

4.4.4.2 Throughout the school's time off-site, it has remained focussed on its core function of providing excellent teaching and learning; a fact demonstrated by the 2013 ERO report.⁴⁴ During that time a committed and cohesive school community has waited for the decision for our school to return to Redcliffs. This is the only certainty that the community requires.

4.4.4.3 The Minister has proposed that the date of closure would be January 2017. The Board has sought advice from architectural firms⁴⁵ and project managers as to construction timeframes which show that, with a timely decision, Redcliffs School could be back on its Main Road site for the 2017 school year⁴⁶, assuming a partial rebuild as recommended by Beca (Option 1A) and referred to in the 6 March Education Report.⁴⁷

4.4.4.4 If the school buildings were completely rebuilt, as referred to by Beca (Option 2) construction timeframes estimate that the school would be back on site for the beginning of the 2018 school year.⁴⁸

4.4.5 Responsibility for future risk assessment

4.4.5.1 The Minister has raised concerns about which agency would be responsible for future risk assessment at the Main road site⁴⁹. The Eliot Sinclair report makes it clear that the highly conservative nature of the new mitigation plan means that detailed reassessment is unlikely to be required:

⁴² Education Report 9 November 2015, Pg 2 Minister's handwritten note and paragraphs 69-70.

⁴³ Email from Brendan Winder, LINZ, 29 March 2016, and photograph, Appendices 14 and 15

⁴⁴ 2013 Education Review Office report

⁴⁵ See Appendix 9, Skews & Associates architectural designs

⁴⁶ Joseph & Associates indicative construction programme – existing buildings 24 March 2016

⁴⁷ Education Report 6 March 2015, paragraph 34 and Beca report June 2014

⁴⁸ Joseph & Associates indicative construction programme – new school 24 March 2016

⁴⁹ Education report 9 November 2015, handwritten note Pg 2, paragraph 53

"No requirement to provide detailed reassessment of the cliff stability hazard following a large event due to the ample storage capacity and separation distance from the cliff. A large rockfall would be of little consequence to the mitigation works or the on-going safety of the site – in lay terms, it "does not matter" if a large rockfall occurs and that another one could follow...

*With the proposed mitigation measures in place the risk of circumstances that could give rise to disruption due to rockfall is negligible"*⁵⁰

4.4.5.1 It is appropriate that future monitoring of the mitigation works will be the responsibility of the Board using the services of qualified geo-professionals⁵¹ and would not place any unreasonable obligation on the Board. Boards of Trustees routinely engage experts in a range of fields (architecture, engineering, fire protection and so) to provide advice to allow them to fulfil their role in managing school property. The monitoring and maintenance of the mitigation works would sit within this established practice.

4.4.6 Diversion of resources

4.4.6.1 The Minister has expressed concern regarding the potential diversion of resources away from the provision of education.

4.4.6.2 Eliot Sinclair advises that with the newly proposed mitigations in place, the need for ongoing monitoring and maintenance would be limited:

*"The highly conservative design and layout is such that even for very large volume rockfall events the material will be amply contained and the requirement to undertake detailed, time-consuming, costly rock source monitoring is not warranted."*⁵²

4.4.6.3 As mentioned above this would form part of a routine programme of property and infrastructure maintenance carried out by schools, where necessary with expert input.

5. Negative Effect of Closure on the Community

Overview

5.1 The Education Report of November 9 2015 states, in relation to submitters' concerns regarding the impact on the wider Redcliffs community, that:

*"The Ministry considers that it would be inappropriate to make decisions on the schooling network based on any actual or potential impact on housing prices or the demographic composition of a community. As Minister of Education, your decision-making needs to be guided by considerations relating directly to educational provision."*⁵³

⁵⁰ Eliot Sinclair Report, 30 March 2016, Appendix 8, page 27

⁵¹ See Eliot Sinclair report page 17 which notes there are several approved geo-professionals who can undertake the compliance monitoring, which would be consistent with the monitoring required for other recently constructed similar structures in Christchurch

⁵² Eliot Sinclair report 30 March 2016, Appendix 8, page 18

⁵³ Paragraph 88, Education Report dated 19 November 2015

- 5.2 The Board disputes this statement and considers that the impact of closing Redcliffs School, both on the school community and on the wider Redcliffs community is a significant consideration in the decision regarding closure which has not been given enough focus in the advice to the Minister to date.
- 5.3 The importance of communities in the recovery phase, and the need to prioritise psychosocial recovery following the earthquakes is recognised in the documents referred to above in this submission at Section 3, Framework for Decision and Appendix 1 Earthquake Recovery context – legislative/policy framework.
- 5.4 The Board refers to and relies on research and expert opinion which demonstrates that the impact of closing the school would have significant negative effects on the community as well as on the education of children in the Redcliffs community.
- 5.5 Education does not happen in a vacuum, but in the context of a community; in this case, a community currently in recovery following traumatic events.
- 5.6 The Board emphasises that the Minister must consider the wider implications of closure on the community in terms of not only educational outcomes, but also health and well-being outcomes and recovery outcomes. The expert evidence is clear that these are likely to be compromised by a decision to close the school.
- 5.7 The expert opinions, and the international research, show⁵⁴:
- The closure of a school in a community that has undergone significant trauma, such as that experienced by the Redcliffs community, can have long term, negative effects;
 - Schools bind and sustain communities. While schools are primarily places for teaching and learning, they also provide a vital eco-system that supports the people of local communities. Schools play a central role in the growth and development of social capital in any community and add value to people's lives through the networks they create between people and institutions in that community;
 - Schools are catalysts for the development of strong, cohesive networks that offer educational and health benefits to the whole community. Strong communities lead to better education and health outcomes;
 - The resilience of a community network is critically important when that community is faced with disaster. Strong communities are more resilient and sustainable better at coping with crisis or disasters and managing through a post-disaster recovery period;
 - Removing a school from a community in recovery is detrimental and can curtail, prolong or even prevent full recovery of individuals within that community.
- 5.8 These themes are further emphasised and supported by a letter from the Mayor, Honourable Lianne Dalziel in which she asks the Minister to reconsider her decision to close Redcliffs School. She refers specifically to the importance of schools in communities as part of their

⁵⁴ See letter from Bruce McNatty to the Board, March 21, 2016, Appendix 19 *"The closure of the school can only serve to protract the community's earthquake recovery"*; letter from Dr. Lucy Hone, to the Board March 11, 2016, Appendix 18 : *"It is my opinion that the removal of the school will have a significant negative impact on community cohesion"*; CDHB: The role of schools in communities and community recovery post disaster (2012) Appendix 18(a) at p 20: *"and the current proposed changes for the school sector in Christchurch may represent an additional burden that is unhelpful for their wellbeing in the wake of the earthquakes."*

recovery from the earthquakes, and to an urban planning expert who emphasises the importance of easy access to key community facilities.⁵⁵

Redcliffs School is the heart of the Redcliffs Community

- 5.9 Redcliffs School has been the centre of the Redcliffs community for 108 years. Established in 1907, Redcliffs School was opened because the people of Redcliffs were adamant that the area formed a distinct neighbourhood, separated from the other communities nearby because of its unique geographical position⁵⁶. The school has provided a sense of focus and cohesion to the community for the length of its history and offers multiple resources and amenities to the community that would be lost to them, should the school close.
- 5.10 Redcliffs School has also played a vital role in enabling community resilience throughout its long history.
- 5.11 The school was the main provider of support to the wider community during and following the earthquakes of 2011. The Redcliffs Board of Trustees established emergency community support networks. In addition to their core function of getting Redcliffs School back up and running, the Board also co-ordinated visits to local elderly people, provided information and advice to residents, assisted with access to the basics of shelter, water, toilet facilities, and safety. They maintained a central point for communications with other agencies by setting up a website and broadcasting key information; as well as creating a central physical presence in the village by providing and manning a caravan. Without the school stepping in to play a co-ordination role, the Redcliffs community would have been far less able to manage its basic needs during this crucial time.
- 5.12 This provided critical community cohesion during very difficult times and the school became a central resource for the community. The Board notes that Sumner School played the same role in Sumner, and Mt Pleasant provided a version of this for Mt Pleasant, as well as Heathcote School in Heathcote. This demonstrates that all schools in the Bays cluster are central to their own unique and distinct communities, and were drawn upon by those communities as a much-needed resource during the recent disasters that were experienced profoundly in this area of Christchurch.
- 5.13 The school remains an ongoing source of community strength and support through the current period of recovery.

Research and expert opinion: communities and the impact of school closure

- 5.14 In a report entitled, "The complexity of community and family influences on children's achievement in New Zealand: Best evidence synthesis"⁵⁷ the authors note:

*"A community has been defined as a relatively stable network of relationships among a group of people who have common interests, a network from which they draw support, friendship and a sense of identity or connectedness greater than that provided in a family alone. From a societal perspective, it is communities (and families) that create and preserve social cohesion."*⁵⁸

⁵⁵ Letter from Mayor Lianne Dalziel, 30 March 2016, Appendix 16

⁵⁶ Scott, E. (2007). The village school that came to town. Christchurch: Redcliffs School. (p14).

⁵⁷ Biddulph, F, Biddulph, J, Biddulph, C,] June 2003, (p15)

⁵⁸ This definition is drawn from Rogoff, Bartlett & Turkanis (2001) and Carnoy (2000). See: Rogoff, B., Bartlett, L. & Turkanis, C.G. (2001). "Lessons about learning as a community". In Rogoff, B., Turkanis, C.G. & Bartlett, L. (Eds). *Learning together: Children and adults in a school community*. Oxford: Oxford University Press. Carnoy,

- 5.15 In a letter to the Board, Professor Simon Kingham, Director of Geospatial Research Institute and GeoHealth Laboratory, University of Canterbury, summarises some emerging findings from new research he is conducting. He notes:

*"People in areas with clear geographical boundaries i.e. they know which community they live in, have a stronger sense of community. Redcliffs would fit into this category. A strong sense of belonging and community is an emerging sign of a faster post-disaster recovery."*⁵⁹

- 5.16 Professor Kingham also notes:

*"Schools are emerging as key gathering/bumping places. Communities that had such bumping/gathering places were better able to act collectively for the common good and recover stronger."*⁶⁰

- 5.17 In a letter to the Board, Clinical Family Therapist, Bruce McNatty M.Ed (Hons), comments:

*"There are several factors that bind the Redcliffs community and which contribute to strong connections amongst its residents. Redcliffs' naturally occurring geographical boundaries make it unique. It is very clear to its residents where Redcliffs physically begins and ends, so in that sense it has the feel and appearance of a small town or village, rather than being the suburb of a larger city."*⁶¹.

- 5.18 Dr. Rob Gordon is a clinical psychologist, expert clinician on disaster recovery, consultant to CERA and the Red Cross and has made eight visits to Christchurch to advise on mental health issues post-earthquakes. In a letter to the Board, he notes the important role that schools play in communities which have suffered disasters:

*"Schools include not only those who may have attended them when they were young, and have had successive generations of their families involved, but also other community members who have identified with it as a community feature. The sense of identity is multifaceted but is related to external, tangible community features which provide definition to the sense of self within a geographical locality and over time in history as belonging to a group of people. A sense of identity is an important component of personality and a vital resource for resilience. Disasters damage and destroy the environment, and since the physical features of the environment relate to identity, minimising this loss helps preserve the continuity of identity and social structures and the social capital invested in them."*⁶²

- 5.19 Dr. Lucy Hone, PhD, Researcher in resilience and well-being psychology at AUT, notes in a letter to the Board ⁶³:

"Community resilience relies on the presence of physical spaces where locals can meet and strengthen their bonds via opportunities for regular communication."

- 5.20 A literature review which considers the roles schools play in a post-disaster context carried out by the Information team, Community and Public Health of the Canterbury District Health Board (CDHB) in 2012⁶⁴ recognises that as the "centre of identity for their community," schools provide "...a sense of social cohesion and ultimately contributing to better wellbeing

M. (2000). *Sustaining the new economy: Work, family and community in the information age*. New York: Russell Sage Foundation.

⁵⁹ Letter to the Board, March 28,, 2016, Appendix 20

⁶⁰ Letter to the Board, March 28, 2016, Appendix 20

⁶¹ Letter to the Board, March 21, 2016, Appendix 19

⁶² Letter to the Board March 15, 2016, Appendix 17

⁶³ Letter to the Board March 11, 2016, Appendix 18

⁶⁴ CDHB: The role of schools in communities and community recovery post disaster (2012) Appendix 18(a) p3

for their community.” This research is referenced by Dr. Lucy Hone in her letter referred to above.

- 5.21 There is compelling international evidence that shows a strong link between a functional community with high social capital and high educational outcomes in that community. Research that has been largely led by Professor Robert Putnam, Kennedy School of Government, Harvard University, shows that the stronger the community, the better the educational outcomes of that community. In addition, he goes on to link better educational outcomes to a higher quality of life. These life outcomes might include higher levels of post-compulsory educational achievement, better employment outcomes, higher pay rates, greater engagement in the civil affairs of one’s country, lower crime statistics, and a range of other social good measures.⁶⁵

- 5.22 Conversely, Putnam also shows that the weaker the social capital of a community, the worse their educational outcomes will be. With reference to a graph showing U.S state social capital measures against U.S state education outcomes, Putnam describes the causal relationship:

“The relationship shown is strong enough to pass what is known in political science as the inter-ocular trauma test – it strikes one between the eyes. The relationship between educational performance and social capital is ... two orders of magnitude stronger than, for example ... spending on schools or teacher/pupil ratios or any of the obvious things that are more usually thought to increase educational performance.”⁶⁶

- 5.23 Dr. Rob Gordon also refers to the effect of closure on broader educational outcomes for the children of a community:

“For children, while they may continue to meet educational goals, the consequences may be felt in their social relationships and recreational activities. It is likely to be the social capital as a resilience resource which is affected, rather than core educational functions.”

- 5.24 The CDHB’s review⁶⁷ found that:

“success in school and years in education are major factors in future social and occupational status throughout life. Education, together with income and employment status, has been identified as critical to determining an individual’s social and economic position and ultimately their health outcomes.”

“The current and future health of our region’s children and young people is strongly associated with each individual’s educational achievements and level of qualification attained. Education, together with income and employment status, is critical to determining an individual’s social and economic position and ultimately their health outcomes. A low level of educational attainment is associated with poor health status.”

- 5.25 Additional research carried out by the CDHB’s Department of Community and Public Health division⁶⁸ focuses specifically on the role of education in determining health:

“Education is recognised as a key element of sustainable development and can be considered one of the most important underlying determinants of health outcomes for

⁶⁵ Putnam, (1995, 2000), and in an Advisory paper to Ministers of Education of the OECD (2004)

⁶⁶ Putnam, Advisory paper to Ministers of Education, OECD (2004)

⁶⁷ CDHB: The role of schools in communities and community recovery post disaster (2012) Appendix 18(a) p7

⁶⁸ CDHB: Community and Public Health division, Education as a determinant of health (2003) p1.

both individuals and communities. Education reduces poverty through increased employment, and provides skills for attaining better health."

- 5.26 The link between education and health outcomes referred to above is borne out in international research that finds that the presence of social networks and strong communities has a protective effect on health. This research shows that individuals embedded in a network or community rich in support, social trust, information, and norms, have resources that help achieve health goals.⁶⁹
- 5.27 This relationship between education and health is even more significant in a community that has been affected by disaster. Dr. Rob Gordon refers to this in his letter to the Board⁷⁰ noting that:

"...many people who are significantly affected [by disaster], have no prior knowledge of using formal mental health or welfare services and often do not see their relevance to their current situation. They do not approach formal support services, and consequently, their assistance has to come from their familiar informal systems and networks which supported their mental health before the disasters."

"Disruption is a significant stress factor in itself, which has been associated with long term health consequences such as increased blood pressure and the rise in age-specific death rates (Sperling and Eyer, 1988, quoted in Hammond, 2000). However, as a social stressor, it also reduces people's energy, the quality of their decision making, planning and thinking processes (Hammond, 2000) which in turn may affect the quality of their recovery. Hence minimising disruption of social routines and activities is an important resilience strategy."

- 5.28 In terms of the importance of resilient communities during and after a disaster, he notes:

"Longstanding international experience and research show that recovery from disasters is best supported by networks and activities as close to affected people's normal lives as possible. Adaption of pre-existing structures and networks is preferable to introduction of new ones, since they constitute an invisible social capital of existing relationships and history that have intangible but important assets for identity."

- 5.29 Dr. Lucy Hone also emphasises this, noting:

*"...Redcliffs School provides social cohesion – an important function for its community beyond that of providing a high quality educational experience. While the latter can be achieved elsewhere, closing Redcliffs School may have an effect on the community resilience."*⁷¹

- 5.30 The CDHB's Review notes:

"Schools have played a central role in providing a sense of normality for students and parents following disasters, including the Canterbury earthquakes. This is very important, as exposure to disasters can lead to mental health problems in children. Teachers can help monitor the ongoing mental health of children over time. However,

⁶⁹ See Hawe, P. & Shiell, A. (2000). Social capital and health promotion: a review. *Social Science & Medicine*, 51, 871-885. ; Kawachi, I. (1999). Social capital and community effects on population and individual health. *Annals of the New York Academy of Sciences*, 896, 120- 130.; Kawachi, I., Kennedy, B. P., & Glass, R. (1999a). Social capital and self-rated health: A contextual analysis. *American Journal of Public Health*, 89(8), 1187- 1193.

⁷⁰ Letter to the Board March 15, 2016, Appendix 17

⁷¹ Letter to the Board March 11, 2016, Appendix 18

teachers themselves need ongoing support following disasters, and the current proposed changes for the school sector in Christchurch may represent an additional burden that is unhelpful for their wellbeing in the wake of the earthquakes.”⁷²

Conclusion

- 5.31 Redcliffs School is inextricably linked to its community (which is both the school community and the wider community which is Redcliffs as a whole). Removing the school would:
- Split the school community in half, literally, because the proposal is to send half the families to Sumner and half to Mt Pleasant schools;
 - Weaken the community’s ability to connect and form linkages because people would have fewer opportunities to meet and make connections – this affects both the school community and Redcliffs as a whole;
 - Remove the school community as an informal system and network which supports the mental health of parents, teachers and students in the recovery phase;
 - Defeat and end the community/school joint commitment which currently exists and which is one of the core strengths of Redcliffs School;
 - Weaken the resilience of Redcliffs and reduce its ability to co-ordinate disaster response in future; and
 - Weaken the social capital of Redcliffs – which, as the research shows, also jeopardises the education, health and wellbeing, and recovery of the whole community post-disaster.

6. Negative Transport Effects of Closure

- 6.1 In the 30th June 2015 Board submission in response to the Minister’s proposal to close Redcliffs School, Darren Fidler of Jacobs New Zealand was the author of Appendix D: “Transport Impact Assessment of Closure”.
- 6.2 Andy Carr of Carriageway Consulting was commissioned by the Ministry of Education to undertake a review of the Board’s submission on the proposed closure of Redcliffs School, and in particular Appendix D. His conclusions are set out in a report dated 11 September 2015.⁷³
- 6.3 Following this review, Darren Fidler and Andy Carr met to discuss the likely transport outcomes and areas of agreement and disagreement. The outcome of this meeting is summarised in a Joint Statement of Transport Planning Witnesses, Appendix 23 to this submission.
- 6.4 The Ministry has not undertaken any transport assessment to establish the likely impacts around Sumner and Mt Pleasant Schools, which both experts agree would be prudent to

⁷² CDHB: The role of schools in communities and community recovery post disaster (2012) Appendix 18(a) p 20

⁷³ Appendix 8 to Education Report dated 9 November 2015

ensure that no adverse safety or efficiency effects will arise as a result of the increase in vehicle numbers⁷⁴ This assessment would consider likely impacts and mitigation measures.

Economic Effects

- 6.5 The transport experts agree that proposed closure of Redcliffs School will likely result in negative economic effects as follows:
- increased travel time, which has an estimated economic cost of between \$0.5 million and \$0.9million⁷⁵ based on net present value; and
 - increased vehicle operating costs of between \$0.4 million and \$0.8 million⁷⁶ over a standard 40 year evaluation period with a 6% discount rate applied. If the school roll increases as expected, these figures will also increase.

Reduction in Active Transport

- 6.6 Many Redcliffs School students are currently able to walk to the Main Road site unchaperoned due the close proximity. If they are required to attend Sumner or Mount Pleasant School, in most cases this would not be appropriate because of the larger distances and route safety to neighbouring school sites.
- 6.7 It is likely that, rather than caregivers accepting an additional 3 hours of travel time a day walking to neighbouring school sites, there will be a reduction in students walking or cycling to school. This would result in a **minimum** economic cost (through associated health issues) of \$1.27 million over a standard 40 year evaluation period.⁷⁷
- 6.8 Ministry of Education advice notes that⁷⁸:
- "one of the best ways to ease traffic congestion is to reduce vehicular traffic which is to encourage students, caregivers and staff to come to school by walking or cycling."*
- 6.9 A reduction in active transport will result in wider negative implications as set out by the Ministry of Health^{79,80} and the NZ Transport Agency⁸¹ which specifically highlight the benefits of introducing children to cycling and the benefits of investing in walking and cycling.
- 6.10 Such a reduction is also contrary to the four goals of the Christchurch City Council Transport Strategic Plan⁸² which are as follows:
- Improve access and choice;
 - Create safe, healthy and liveable communities;
 - Support economic vitality; and
 - Create opportunities for environmental enhancements."

⁷⁴ Joint statement of transport planning witnesses, Appendix 23, paragraph 16

⁷⁵ Joint statement of transport planning witnesses, Appendix 23, paragraph 9

⁷⁶ Joint statement of transport planning witnesses, Appendix 23, paragraph 14

⁷⁷ Joint statement of transport planning witnesses, Appendix 23, paragraph 12

⁷⁸ <http://www.education.govt.nz/school/property/state-schools/day-to-day-management/traffic-management/>

⁷⁹ <http://www.health.govt.nz/your-health/healthy-living/food-and-physical-activity/physical-activity/activity-guides/cycling>

⁸⁰ <http://www.health.govt.nz/your-health/healthy-living/food-and-physical-activity/physical-activity/activity-guides/walking>

⁸¹ <https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/benefits-of-investing-in-cycling/>

⁸² <http://www.ccc.govt.nz/the-council/plans-strategies-policies-and-by-laws/strategies/transport-strategic-plan-2012/>

- 6.11 The concerns about any reduction of active transport are reflected in the letter from the Mayor, Hon Lianne Dalziel, who refers to the Ministry of Health's Childhood Obesity plan and also cites Charles Montgomery, urbanist, who notes that individuals are happier and healthier when communities can walk or cycle to critical facilities such as schools, community centres, and transport links.⁸³

Increased Congestion

- 6.12 With additional traffic to and from neighbouring school sites there will be increased delays on existing routes which are already severely congested⁸⁴. The Board argues that this is likely to increase the risk of accidents on these routes, however further analysis is required as recommended by the transport experts.
- 6.13 There will be an increased risk of accidents due to more vehicles turning right onto Main Road⁸⁵ as well as increased vehicular traffic volumes at Sumner and Mt Pleasant schools.

Enrolment Zones

- 6.14 It is also noted that the provisions in the Education Act 1989 which deal with enrolment zones reflect an intention to ensure that students can attend a "reasonably convenient" school.⁸⁶ A school's home zone must be an area for which the school is a "reasonably convenient" school for a student living in that area to attend.⁸⁷
- 6.15 A "reasonably convenient" school means a State school that a reasonable person living in the area in which the school is situated would judge to be reasonably convenient for a particular student, taking into account such factors as the age of the student, the distance to be travelled, the time likely to be spent in travel, the reasonably available modes of travel, common public transport routes, and relevant traffic hazards.⁸⁸
- 6.16 The Board argues that the proposed change to the enrolment zones for Sumner and Mount Pleasant Schools would result in a situation where these zones extend to Redcliffs students, for whom those schools would not be "reasonably convenient".

7. Conclusion

- 7.1 The Board, in this submission, has provided arguments based on new expert evidence which address the Minister's reasons for closure, as well as the significant negative impacts of closure. These arguments, based on the evidence, demonstrate that closure of Redcliffs School is neither necessary, nor warranted.
- 7.2 The Board argues that, in view of the relevant framework for the decision, the expert evidence and the significant negative impacts of closure, the only reasonable decision is that Redcliffs School should remain open, and should return to the Main Road site. A solutions-focussed approach should be taken to expedite this to provide the only certainty and outcome desired by the community.

⁸³ Letter from Mayor Lianne Dalziel, 30 March 2016, Appendix 16

⁸⁴ Joint statement of transport planning witnesses, Appendix 23, paragraphs 10 and 11

⁸⁵ Joint statement of transport planning witnesses, Appendix 23, paragraph 15

⁸⁶ Section 11I (1)(b) Education Act

⁸⁷ Section 11 E Education Act

⁸⁸ Section 11 B Education Act

