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Banks Peninsula Destination Management Plan submission

Thank you for the opportunity to comment on the Banks Peninsula Destination Management Plan. We note the definition of the Destination Management Plan as “the opportunity for communities to define how tourism can best serve their people and their land”. It is in that spirit and with that aspiration that we write this submission.

We value the opportunity to provide this feedback on the Plan, and thank you for the opportunity to be involved in the earlier stakeholder workshops. We note, however, that the Rod Donald Banks Peninsula Trust is not included in the list of organisations consulted with on page 3 of the consultation document, or in the acknowledgements on page 2 of the draft Plan. We also note that for a piece of work of this significance, consultation timeframes have been relatively short. We would also be interested in what peer review of methodologies and stakeholder engagement might have taken place or be planned.

We generally support the draft vision, although suggest adding the word “environment”, which is wider than the current “geography”. We support the “regenerative tourism” objective, although note that the plan needs to be structured to achieve this, rather than being aspirational in this regard. A significant shift is required to move from destination marketing to destination management, and many of the initiatives proposed in the Plan seem to support a continued mass tourism approach, rather than a regenerative one. Examples of this would be proposals to upgrade transport infrastructure and to increase the capacity of tourism facilities. A focus on slow tourism, and a particular focus on local and domestic visitors, would be most sustainable.

We also note the need for deep engagement and partnership with Mana Whenua, both in the development of the plan, and in its language, substance, and any proposed actions and their implementation. This will need to occur with each of the Banks Peninsula hapū. A Treaty based approach will be required. We note that there is an obvious tension between guardianship of the environment and the land, and the idea of that same land and environment being a natural visitor attraction.

We note the absence of any focus on resilience to climate change and climate change adaptation in the Plan. These must go hand in hand with regenerative tourism, and must be top of mind when planning new initiatives. Similarly, any focus on marine tourism needs to go hand in hand with protection of marine reserves and the marine mammal sanctuary in order to protect the species which attract visitors.

A partnership approach will be required with organisations which are already working on biodiversity, ecological restoration, geological interpretation, knowledge, education and outdoor recreation projects. These include the Banks Peninsula Conservation Trust, Pest Free Banks Peninsula, the Banks Peninsula

Geopark, and the Rod Donald Trust. Wider consultation, involvement and partnership with these groups will be required, rather than just with community and business groups.

The Rod Donald Trust is already working on Te Ara Pātaka, the Head to Head Walkway, recreational opportunities in the Little River area, the Little River Rail Trail, the Banks Peninsula Walking Festival, and other educational, biodiversity and outdoor recreation projects. We request that we are included in discussion of any proposals or actions in the Plan relating to these projects, or other similar projects in which we may be involved or which fall within our areas of strategic focus - Access, Biodiversity, Knowledge and Partnership.

The nine pillars are a useful approach, although we note the comments regarding implementation. We would encourage ensuring that the recommendations and interventions set out in the plan are capable of being funded and implemented, to avoid a risk of raising expectations through the creation of a plan which does not result in action.

Cruise tourism requires management. If the intention is for visitor activity on Banks Peninsula to be regenerative, there will be a need for a significant reduction in cruise activity, a change in the way the activity is carried out, or realistic and valuable offset in the form of grants for ecological restoration or other activities that allow for the activity to be net regenerative. It should be borne in mind that Lyttelton is a commercial port, whereas Akaroa is not. Both harbours are unique natural environments, and controls should be in place to limit cruise activity to avoid negative environmental and social impact. The impact of cruise ships on the environment and on our communities must be measured, understood and managed. Appropriate regulation is required and must be enforced. Akaroa being over-run by unsustainable numbers of cruise passengers is unacceptable, as is the inability of Lyttelton residents to use public transport and other key infrastructure because of the impacts of cruise.

The improvement of roading and other infrastructure across Banks Peninsula will benefit residents and visitors alike. We support the waterway and catchment management initiatives proposed, and would encourage that this work be carried out in partnership with agencies and groups that are already focused on this work.

Upgrading the State Highway will bring benefits, whereas upgrading other minor and unsealed roads to improve visitor access may have the unintended result of changing the nature of our remote and isolated rural communities, and encouraging visitors into difficult and potentially dangerous terrain. The suggestion to improve the route from Lyttelton to Pigeon Bay is one such example - this is a minor route through small, remote communities which by its nature would challenge many drivers. The level of upgrading required to make this a suitable route for visitors would be significant, and would need to include the similarly remote and difficult return route out of Pigeon Bay to join the State Highway. This project, and any other similar proposals are not supported, being both impractical and undesirable.

Water transport from Akaroa to Wainui has been discussed in the past, and would enhance outdoor recreation activities including a possible route for the Te Ara Pātaka walkway, linking Lyttelton with Akaroa. We support a serious investigation of this opportunity, in conjunction with the Rod Donald Trust's further proposed development of Te Ara Pātaka. We support the extension of Public Transport networks to Governors Bay, Little River and Akaroa, either in the form of scheduled services or "on demand" models. These would benefit both visitors and residents, potentially reducing private vehicle use and associated emissions. We support early and deliberate investigation and trials of these proposals.

We support better signage regarding weather and road conditions, particularly for Evans Pass, Dyers Pass, Gebbies Pass and the Hilltop. Similarly, we support additional EV charging stations at key locations on Banks Peninsula, particularly including increased facilities to meet demand in Little River and Akaroa, and addition of new facilities in other relevant locations which would benefit both visitors and residents.

We do not support the addition of any tourism infrastructure development and new attractions which would drive unsustainable levels of visitor activity, cause environmental degradation or change the nature of Banks Peninsula. We do, however, support the development of low-impact and regenerative activities which are in harmony with our communities and environment, such as low-impact outdoor recreation, cultural and educational activity, and activities which contribute to positive environmental and ecological outcomes. In particular we support the development of the Head to Head Walkway and the extension of Te Ara Pātaka to Akaroa, along with recognition of the Little River Rail Trail as one of the key recreational access routes onto Banks Peninsula. Appropriate funding and resourcing should be in place to support work in partnership with the Rod Donald Trust and other agencies already involved in the delivery of these projects.

We would welcome improved internet coverage and communications connectivity across the Peninsula. This would benefit visitors and residents and increase community resilience and safety.

In developing a “narrative” for Banks Peninsula, it must be borne in mind that the Peninsula consists of a large variety and diversity of communities and environments. Any “narrative” exercise must be community led, genuine and authentic to be valid. Similarly, any committee formed to oversee or guide the implementation of the Plan would need to be locally led, involving a range of existing Banks Peninsula organisations and the elected Community Board.

In developing the “communities of special character” concept, the guiding principle must be that these are Banks Peninsula towns where residents live, not visitor playgrounds. Both Lyttelton and Akaroa have significant heritage values and are physically constrained, which limits their ability to sustainably absorb further development. The work to develop the “communities of special character” concept must be community led, and supported by resident communities - “done with”, not “done to”. We are concerned by statements such as “activating” communities and “widening the range of activities” as potentially changing the nature of these settlements for the benefit of increased numbers of visitors. We are concerned that this initiative could have the effect of promoting mass tourism, rather than a regenerative model, and that market driven mass tourism would destroy some of the character which is intended to be promoted and preserved, and which is the very same character which attracts visitors.

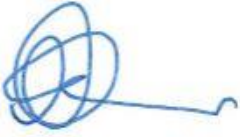
We support the wayfinding, information sharing, connectivity, mapping and messaging initiatives outlined, on the basis that these promote sustainable and regenerative visitor activity which is supported by our communities.

We are concerned by the concept of “increasing capacity of tourism facilities for visitors and residents”. Any proposed activity must be sustainable and regenerative in nature. For example, provision of additional parking spaces may generate additional private vehicle demand which is not environmentally sustainable. We support initiatives which see a shift from private vehicles to public transport, walking and biking as more sustainable transport options. The upgrading of public toilet and other facilities may be desirable, but the carrying capacity of already fragile local infrastructure and limited resources, for example Akaroa’s limited water supply or the lack of reticulated infrastructure in Port Levy, needs to be considered.

Overall, we support the focus on sustainably balanced and regenerative tourism, however note the Plan needs to be structured to deliver this. We support the identification of biodiversity, ecological restoration, environmental protection and low-impact outdoor recreation as areas of focus. The key to the successful implementation of any Destination Management Plan for Banks Peninsula will be a regenerative, community-led approach to determine and achieve the right number of visitors who appreciate what the Peninsula has to offer, rather than one which seeks to create additional attractions and results in an increased number of visitors putting pressure on our already fragile infrastructure and environments.

Should you wish to discuss any aspect of this submission further, we would be happy to do so.

Regards

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Andrew Turner
Trust Manager