

ICOMOS NEW ZEALAND
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**Submission to Ministry for the Environment Manatū Mō Te Taiao -
Te mahere urutaunga ā-motu (tuhinga hukihuki) Draft National Adaptation Plan**

3 June 2022

Introduction

ICOMOS is an international non-governmental organisation of heritage professionals dedicated to the conservation of the world's historic monuments and sites. The organisation was founded in 1965 as a result of the international adoption of the Charter for the Conservation and Restoration of Monuments and Sites in Venice in the previous year. ICOMOS is UNESCO's principal advisor in matters concerning the conservation and protection of historic monuments and sites. The New Zealand National Committee was established and incorporated in 1987.

ICOMOS New Zealand (ICOMOS NZ) has 140 members made up of professionals with a particular interest and expertise in heritage issues, including architects, engineers, heritage advisers, archaeologists, lawyers, and planners.

In 1993 ICOMOS NZ published the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value. A revised ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value was approved in September 2010 and is available on the ICOMOS New Zealand website.

The heritage conservation principles outlined in the Charter are based on a fundamental respect for significant heritage fabric and the intangible values of heritage places.

Context of this submission

New Zealand's natural and built environments are unique and special. They provide us with places to live, learn, work and socialise and form a fundamental part of our local and national identity.

Cultural/historic heritage plays a valuable role in contributing to the sense of uniqueness and quality of built and natural environments we experience. It is a finite resource that helps ground our 'sense of place' and brings wellbeing benefits to present and future generations. Heritage places, for example:

- Enable us to appreciate our collective history of occupation and settlement, including a greater awareness of our people, places and stories
- Act as agents to bring diverse communities together, promoting social inclusion, cohesion and empathy

- Contribute to our tourism economy through enhancing the reputation and attraction of an area, along with their viability as visitor destinations in their own right
- Create, through their conservation, high quality employment and educational opportunities
- Contribute to our resilience in the face of significant change by providing a focus for community sentiment and sense of place
- Provide opportunities for emissions and building waste reduction through retention and adaptive reuse

Scope of this submission

In light of this context ICOMOS NZ welcomes the opportunity to respond to the Draft National Adaptation Plan.

General comments

ICOMOS NZ is broadly supportive of the coverage of heritage in the Draft National Adaptation Plan.

Specific Comments

We note that ‘Risks to Māori and European cultural heritage sites due to ongoing sea level rise, extreme weather events and increasing fire weather’ (H8) was identified in the Risk Statements and Urgency Scores table as the top Research Priority in the National Climate Change Risk Assessment for New Zealand Arotakenga Tūaru mō te Huringa Āhuaranga o Āotearoa (2020). Risks to Māori social, cultural, spiritual and economic wellbeing from loss and degradation of lands and waters, as well as cultural assets such as marae, due to ongoing sea level rise, changes in rainfall and drought’ (H6) was identified as the fifth priority for research.

ICOMOS NZ supports the identification in the Draft National Adaptation Plan of a critical action to ‘Support kaitiaki communities to adapt and conserve taonga/cultural assets and the timeframe of 1-6 years. We understand that critical actions are committed.

ICOMOS NZ supports the actions related to heritage in the future work programme proposals – Design methodology for risk assessments of public buildings (Years 3-4); partner with Māori and owners to increase the resilience of Māori-owned land (Years 2-3), homes and cultural sites; Research how cultural heritage contributes to community wellbeing and climate change adaptation (Years 1-4); Produce guidance for disaster risk management for cultural heritage (Years 2-5); develop a framework for assessing exposure and vulnerability of cultural heritage assets/taonga to climate change (Years 1-3).

ICOMOS NZ considers that some of these actions are necessary to achieve this critical action for heritage, and to address the research gap for heritage that was identified as the top research priority. In particular ‘develop a framework for assessing exposure and vulnerability of cultural heritage assets/taonga to climate change’ is vital to informing and achieving the critical action for taonga/cultural assets, and should be considered as a critical action.

ICOMOS NZ strongly supports the need for disaster risk management guidance for cultural heritage. Along with guidance for reducing risks before, during and after disasters, there is a need for funding to support owners to undertake Disaster Risk Management Planning. Beyond reduction of risk, there needs to be guidance, support and systems in place to improve readiness, response and recovery phases of emergency management. This is required in order to improve disaster- risk management for cultural heritage. There is a need for emergency management and cultural heritage to be integrated. The protection of cultural and historic heritage assets is identified as a primary objective in the National Civil Defence Emergency Management Plan Order 2015 (Part 8 Response, Section 113 (h)), however there is no guidance or explicit provision in the Coordinated Incident Management System (CIMS) for the role of heritage technical experts in the EOC in order to support this objective.

There is an opportunity though the critical action 'Modernise the emergency management system' to improve the integration of heritage protection and provision of technical heritage advice within the emergency management system. In the Government's Canterbury Earthquakes Symposium 29-30 November 2018, the lack of integration of heritage and emergency management was identified as a key contributor to the unnecessarily extensive demolition of heritage buildings in Christchurch (Lessons in Heritage – Caring for our Community Identity in a Disaster). The focus of the Symposium was on ensuring that we learn from the Canterbury experience and that we can apply those learnings so that New Zealand as a whole can be better prepared in future for any similar natural disasters.

Managed retreat, and adaptation of heritage buildings and places in response to climate change will require alterations to heritage fabric, and in some cases relocation. These changes may be significant interventions to heritage places. In particular, we are concerned that managed retreat may be used to support arguments for abandonment and/or demolition of buildings, structures, and other items of heritage value. We note that the ICOMOS NZ Charter provides guidance on appropriate interventions and adaptation of heritage places. We are in the process of updating our own guidance on these issues, but some national guidelines or standards that control retreat and the associated treatment of heritage are essential. ICOMOS NZ suggests that detailed guidance on heritage conservation management principles and processes for managed retreat and adaptation may also need to be specifically developed.

ICOMOS NZ believes that central government funding to support the adaptation of heritage buildings and structures, including relocation, is critical to ensuring that response to climate change and managed retreat does not result in a widespread loss of historic heritage. Funding should also be made available for other forms of recognition for heritage places that may be dislocated from their sites to ensure that intangible values, community connections and identity are recognised and preserved to the greatest possible extent.

Conclusion

ICOMOS NZ wishes to thank the Ministry for the opportunity to raise the matters outlined within this submission.

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