

**Before the Hearings Panel
Appointed by Whanganui District Council**

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Whanganui District Council
Plan Change 63

**STATEMENT OF EVIDENCE OF REUBEN DAUBE ON BEHALF OF
HERITAGE NEW ZEALAND POUHERE TAONGA**

Heritage Statement

4 June 2025

1. My name is Reuben George Daubé, and I am employed as Conservation Advisor for Heritage New Zealand Pouhere Taonga (HNZPT) based in the Central Region Office, Wellington.
2. I hold the qualification of Master of Museum and Heritage Practice (MMHP) from Victoria University of Wellington, graduating in 2019. I am currently an Emerging Professional Member of ICOMOS NZ and a member of the Professional Historians' Association of New Zealand Aotearoa (PHANZA).
3. I have 6 years' experience in heritage roles in New Zealand. My previous roles include working as Heritage Advisor RMA at Wellington City Council. I have previously presented evidence at district plan hearings for plan changes relating to Nelson City Council and Hutt City Council.
4. I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and have complied with it in when preparing this evidence. I have considered all the material facts that I am aware of that might alter or detract from the opinions I express. This evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.
5. HNZPT made submissions on the proposed Plan Change 63 (PC63). I provided input into preparation of the submission. I have been asked by HNZPT to assist by providing comment on the consequence of the PC 63's definition of maintenance and repair on heritage preservation work projects.
6. In preparing this evidence I have read relevant submissions, further submissions, and the Section 42A reports prepared by Council staff and/or consultants.
7. My evidence focuses on the appropriateness of the two definitions of 'minor works and maintenance' and 'maintenance and repair', and the associated rule framework.
8. The *Maintenance and Repair* of a heritage place should be encouraged by council through the district plan. This is usually done by way of supportive policies and a permitted activity rule for maintenance and repair.

9. The repair of decayed or damaged fabric is a desired outcome from a heritage perspective and, when practical, should be prioritised. This falls within the scope of Minor Works and Maintenance as defined in the District Plan. However, to prevent further deterioration of a place, there are cases when it is pragmatic and preferable to replace a larger amount of decayed fabric with like-for-like or near as practically possible. Under the two-tiered definitions in PC63, this category of work would trigger the need for a resource consent.
10. My concern is that a two-tiered definition of *Maintenance and Repair* could discourage an owner from undertaking critical works if resource consent is required, particularly an issue if routine maintenance has been deferred over a long period of time. In my experience, a broad definition of *Maintenance and Repair* is workable and should enable owners to stay on top of building maintenance without having to work through a consenting framework. This approach is similar to other councils, such as Wellington City Council and Hutt City Council.
11. In my opinion, a broader approach does not stop council requiring resource consent in cases where it is determined that a project goes beyond the scope of what can be deemed as maintenance and repair and falls in the category of alterations. This can be assessed on case-by-case basis.
12. For example, the like-for-like replacement of the corrugated steel roof at Antrim House (Wellington) was undertaken as a permitted activity. The works were assessed as maintenance and repair, and the actual impact of the works on the heritage values of the place was negligible.
13. In contrast, resource consent was required for the replacement of Welsh Slate roof at Goldies Brae (Wellington) with a rubber slate alternative. The works were assessed as an alteration as the introduction of the new fabric impacted on the authenticity of the place and required assessment.
14. There are a large number of heritage places in Whanganui relative to the size of the district. It would therefore be desirable to avoid the need for a consent process for simple repair projects; but rather focus resources on projects and situations where the assessment and oversight of a resource consent process is justified.

A handwritten signature in dark ink, appearing to read 'Reuben Daubé', with a stylized flourish at the end.

Reuben Daubé

4 June 2025