DRAFT HEALTH PROMOTION POLICY CONSULTATION DOCUMENT

20 24



Healthy Beverages, Smokefree and Vapefree, and Sun Protection 2024

pncc.govt.nz/healthpolicies



Introduction

Palmerston North City Council (the Council) is proposing to adopt the draft Health Promotion Policy (Healthy Beverages, Smokefree and Vapefree, and Sun Protection) 2024. This policy will replace three existing health policies which are Healthy Beverages, Auahi Kore Smokefree and Vapefree Outdoor Areas, and Sun Protection. The consultation document sets out the proposed changes, the reasons for the changes, and how you can let us know your views and if we got this policy right.

Health outcomes are determined by the social and economic environment, the physical environment, and a person's individual characteristics and behaviours. The 'social determinants of health' create a complex web around individuals and communities, making better health outcomes a multifaceted issue that requires systemic, multilevel solutions extending beyond the health sector alone. While Council does not have a formal role in health service delivery, it plays a crucial part in creating and promoting conditions that contribute to building healthy communities.

Council owns and/or administers land and facilities that are available for public use and enjoyment. Council is also an event provider in the City, and therefore, it has direct control on how these places and events are managed in a way that reflects community values and expectation.

The proposed policy seeks to continue the intent of the existing health policies in promoting the health of the community by encouraging behaviour change in settings where the Council has influence or control, such as in Council-controlled public places, facilities and events.

The Proposal

The proposed Policy includes a number of changes. Many of these proposed changes are minor, but a few are more significant, and these are detailed below:

¹ Community and Public Health Te Mana Ora. (2024). *Health in All Policies approach at Community and Public Health*. Community and Public Health Te Mana Ora. https://www.cph.co.nz/your-health/health-in-all-policies/

Policy reference	Explanation
Draft Health Promotion Policy (Healthy Beverages, Smokefree and Vapefree,	We propose that the Healthy Beverages, Smoke-free and Vape-free
and Sun Protection) 2024	Outdoor Areas and Sun Protection Policies be combined into one policy. This will provide a neat package that describes all the elements of Council's approach to health promotion. There will be more consistent oversight across all health promotion areas in terms of implementation. Also there will be more opportunity for consistent review of the Policy to ensure responsiveness to community needs and expectations.
Section 2 - Strategic context	This section has been updated to align with Council's Long-Term Plan 2024-2034. It sets out clearly the goals and specific outcomes this policy contributes to reinforcing the startegic drivers of this policy.
Section 3 - Purpose	Explicitly states the purpose the Policy will fulfil.
Section 5 - Principles	This section sets out the principles that will guide the implementation of this policy.
Section 6 – Scope Subclause c)	Amends the definition of 'events' to be defined as "Council-delivered community events". This definition will help to provide clarity to staff and will target the events that are intended to be captured by the proposed Policy, which are events that are directly delivered by Council for the community. This means that Council has direct control over the planning right through to implementation.
Section 7 – Guidelines	Sets out a new requirement for making smoke-free and vape-free signage
Subclause c)	compulsory to be in te reo Māori and

Policy reference	Explanation
	English. This already happens in practice therefore the policy is being updated to reflect this.
Section 7 – Guidelines	Proposed new requirement for free sun
Subclause f)	block stations to be available at Council-delivered community events, scheduled between September to April (daylight saving months). This currently happens at some Council-delivered events, but the provision is not consistent due to a lack of resourcing and clarity in the definition of 'events'. Given that the definition of events has been tightened in this draft Policy, staff will have greater clarity and the ability
	to plan resourcing to meet this new requirement.
Section 7 – Guidelines	Sets out new requirement to identify relevant public spaces where it would
Subclause j)	be suitable for installing the drinking water fountains over time. This helps to achieve the objective to make water the preferred beverage of choice. Council is currently implementing a programme to install water fountains in some parks, playgrounds, and sports fields therefore this requirement reflects what is happening in practice.
Section 7 – Guidelines	Extends the list of Council facilities where sugar sweetened beverages
Subclause I)	(SSBs) is not to be sold. The existing healthy beverages policy mostly encourages voluntary compliance in stopping the sale of SSBs at some Council facilities. This was in recognition of the existing contracts Council had in place at the time of adoption.

Policy reference	Explanation
	However, the current policy is clear on
	the intention to phase out the sale of
	SSBs and will be actioned when
	contracts come up for review.
Section 7 – Guidelines	Replaces the Smoke-free and Vape-
	free Reference Group with the Health
Subclause p)	Promotion Reference Group to extend
	the focus to include healthy beverages
	and sun protection. Organisations who
	are part of the smoke-free and vape-
	free reference group have wider health
	promotion interests than just smoke-free
	and vape-free therefore a widening of
	the mandate will be viewed as positive.
Section 7 – Guidelines	Sets out a new requirement to raise
	public awareness of the Policy. This is
Subclause s)	currently done regularly with the Smoke-
	free and Vape-free Outdoor Areas
	Policy which has dedicated resource.
	The other two existing health policies do
	not have any awareness campaigns
	which is a barrier to building
	understanding and awareness about
	the objectives of these policies with the
	community.

Reason for the proposal

The following is an outline of the purpose, year of adoption and review of Council's health promotion policies:

Name of policy	Purpose	Year of initial adoption	Year/s reviewed
	To encourage residents and visitors to Palmerston North to be smoke-free and vape-free in public spaces.	2013	2015 2020

Name of policy	Purpose	Year of initial adoption	Year/s reviewed
Healthy Beverages	To encourage healthy beverage choices to contribute to improved health and model good health behaviours for the wider community.	2017	None
Sun Protection	To contribute to a reduction in the incidence of skin cancer by improving shade and other sun protection measures throughout the City.	2010	None

All three policies are due for review. The draft Policy will contribute to improving health issues that are prevalent within the community including:

- Diabetes, unwanted weight gain, and tooth decay in children, from a high sugar diet.
- Premature and preventable death and morbidity from tobacco smoking.
- Melanoma and skin cancers caused by sun exposure.

Tobacco smoking is the most significant cause of premature and preventable death and morbidity in Aotearoa NZ. It is the key driver of inequities in health outcomes for Māori and Pacific people². The latest prevalence data in the New Zealand Health Survey 2022/2023 shows that daily smoking rates is continuing to track downwards. The percentage of daily adult smokers (age 15 years and older) is 6.8%, down from 8.6% in the 2021/2022 year. There has been a decline over time in daily smoking for all ethnic groups, however inequities remain. Smoking rates among Māori are higher than rates in other ethnicities as shown in Figure 1 below. Daily smoking rates for Māori adults in 2022/2023 are 17.1%, down from 21.3% in 2021/2022³.

² Te Whatu Ora – Health New Zealand. (2024). *Health Status Report 2023*. https://www.tewhatuora.govt.nz/publications/health-status-report/

³ Nip, J., Edwards, R., Ball, J., Hoek, J., Waa, A. (2023). Smoking Prevalence and Trends: Key Findings in the 2022/23 NZ Health Survey. Public Health Communication Centre Aotearoa. https://www.phcc.org.nz/briefing/smoking-prevalence-and-trends-key-findings-202223-nz-health-survey

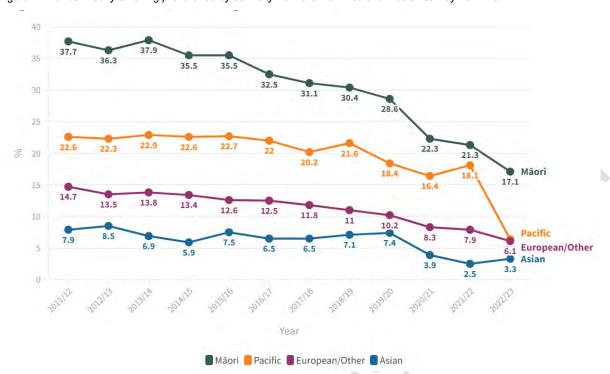


Figure 1: Trends in daily smoking prevalence by ethnicity from the New Zealand Health Survey 2022/234

Table 1 below shows census data from 2006 to 2018 for Palmerston North, indicating the percentage of those who reported being regular smokers by ethnicity. Māori and Pacific Peoples continue to have the highest percentage of regular smokers in the city⁵.

Table 1: Regular smokers, by ethnic group, for people in Palmerston North City, 2006-2018 Censuses⁶

Category	2006 (%)	2013 (%)	2018 (%)
European	19.5	13.6	11.8
Māori	39.9	28.9	24.7
Pacific peoples	31.6	23.2	20.2
Asian	11.9	6.3	6.2
Middle Eastern/Latin American/African	12.6	9.4	10.7
Other ethnicity	16.6	15.3	12.9

⁴ ibid

⁵ Stats NZ Tatauranga Aotearoa. (2018). *Palmerston North City*. https://www.stats.govt.nz/tools/2018-census-place-summaries/palmerston-north-city ⁶ ibid

The latest prevalence data in the New Zealand Health Survey 2022/2023 shows that more New Zealanders than ever are vaping. The increase in recent years was particularly marked among younger age groups, Māori and Pacific peoples, and people living in the most deprived neighbourhoods. The percentage of daily adult (age 15 years and older) vapers is 9.7%, up from 8.4% in 2021/2022. Daily vaping prevalence among 15-17 year olds almost doubled between 2021/2022 and 2022/23 from 8.3% to 15.4%. The increase in daily vaping has been much greater among Māori and Pacific people as shown in Figure 2 below⁷.

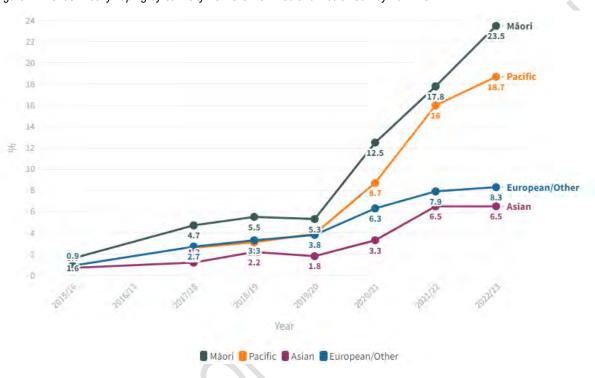


Figure 2: Trends in daily vaping by ethnicity from the New Zealand Health Survey 2022/238

On average, people in Aotearoa consume 37 teaspoons of sugar per day in food they eat and in what they drink. Toi Te Ora – Public Health advise adults should consume no more than 6 teaspoons of sugar per day, and children no more than 3 to 4 teaspoons per day. A 2019 study by Auckland University found that compared to sugar in solid food, sugar in drinks carries a greater risk of causing harmful metabolic changes that lead to chronic illnesses such as obesity diabetes. This is due

https://www.phcc.org.nz/briefing/vaping-prevalence-and-trends-key-findings-202223-nz-health-survey

⁷ Edwards, R., Nip, J., Hoek, J., Waa, A. (2023). *Vaping Prevalence and Trends: Key Findings in the 2022/23 NZ Health Survey.* Public Health Communication Centre Aotearoa.

⁸ ibid

⁹ Toi Te Ora Public Health. (2023). *Sugary Drinks*. https://toiteora.govt.nz/health-topics/sugary-drinks#:~:text=In%20New%20Zealand%2C%20we%20consume,to%20four%20teaspoons%20per%20d@y.

to concentration with which sugar is metabolised when consumed in liquid rather than solid form¹⁰.

Figure 3 below is taken from the New Zealand Health Status Report 2023, it shows the oral health status for year 8 children by district in 2021. The Midcentral district (which includes Palmerston North) had the highest mean of children with decayed, missing or filled teeth (DMFT) in the central region. Midcentral also had the second highest mean for DMFT compared to all other districts nationally¹¹.

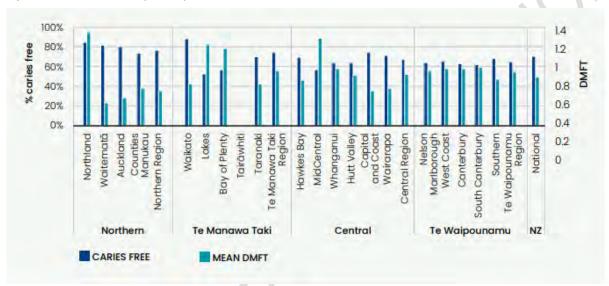


Figure 3: Oral health status, year 8 by district, 202112

Over exposure to UV rays can increase a person's likelihood of developing melanoma or other skin cancers¹³. In Aotearoa New Zealand 47% of cancer deaths are caused by lung, colorectal, breast, prostate cancer and melanoma. Under the New Zealand Cancer registry, the most commonly registered cancers were breast, prostate, colorectal, melanoma and lung as shown in the table below (which was published in the New Zealand Health Status Report 2023.

¹⁰ University of Auckland. (2019). Sugar in drinks more dangerous – study. https://www.auckland.ac.nz/en/news/2019/05/05/sugar-in-drinks-more-dangerous-study.html

¹¹ Te Whatu Ora – Health New Zealand. (2024). Health Status Report 2023. https://www.tewhatuora.govt.nz/publications/health-status-report/

¹² ibid

¹³ Environmental Health Intelligence New Zealand Rapu Mātauranga Hauroa mo te Taiao – Aotearoa. (2021). About UV exposure and health. Massey University Te Kunenga Ki Pūrehuroa. https://www.ehinz.ac.nz/indicators/uv-exposure/about-uv-exposure/

Table 2: Most common cause of cancer registrations by ethnicity, five years 2016-2020 and five-year net survival rates for 2013/14 registrations¹⁴

CANCER TYPE	AVERAGE REGISTRATIONS PER YEAR 2016-2020			FIVE-YEAR NET SURVIVAL RATE			AVERAGE DEATHS PER YEAR 2016-2020	
	ALL	MÃORI	PACIFIC	NON-MĀORI NON-PACIFIC	ALL	MĀORI	NON- MÃORI	ALL
Prostate	3,961	322	128	3,511	87%	85%	87%	681
Breast	3,441	481	186	2,774	85%	83%	85%	675
Colorectal	3,229	246	84	2,898	61%	53%	61%	1,234
Melanoma	2,648	57	7	2,585	90%	89%	90%	320
Lung	2,384	511	122	1,751	12%	9%	13%	1,786
Other	10,163	1,292	563	8,308				5,051
Total	25,826	2,909	1,090	21,827	61%	51%	62%	9,747

Consultation process

Anyone can make a submission about the proposals described in this document. We encourage anyone with an interest in the issues raised to make a submission.

This Consultation Document, and the submission form can be found at:

- Palmerston North City Council website http://www.pncc.govt.nz/yourcouncil/consultations-initiatives-and-projects/consultations/
- Customer Service Centre, Palmerston North City Council, The Square, Palmerston North; and
- City Library, The Square, Palmerston North, and the libraries at Ashhurst, Awapuni, Roslyn, Linton and Te Pātikitiki/Highbury.

You are welcome to appear before the Council and speak to your submission. Please indicate on your submission form whether you wish to do this. The Council intends to hear submissions on this proposal at a Committee meeting likely to be held in November 2024. The date and time for hearings will be confirmed in the letter acknowledging your submission, and will also be advertised in the Manawatū Standard and Guardian newspapers.

To get your submission to us, either:

Mail to: Draft Health Promotion Policy (Healthy Beverages, Smoke-free and Vape-free, and Sun Protection) 2024, Democracy and Governance

¹⁴ Te Whatu Ora – Health New Zealand. (2024). *Health Status Report 2023*. https://www.tewhatuora.govt.nz/publications/health-status-report/

Team, Palmerston North City Council, Private Bag 11034, Palmerston

North 4442

Deliver to: Palmerston North City Council Customer Service Centre, 32 The Square,

Palmerston North

Email to: submission@pncc.govt.nz (subject "Draft Health Promotion Policy

(Healthy Beverages, Smoke-free and Vape-free, and Sun Protection)

2024")

Phone: 06 356 8199 Fax to: 06 355 4115

The submission period runs from 07 October 2024 to 4pm Friday 08 November 2024.

Please note that all written submissions, including the contact details on the submission, will be made available to the public and media and on the Council's website, unless you request that your contact details are kept private. For further information on this consultation please phone the Council on 06 356 8199 or email us at info@pncc.govt.nz.

<u>Te Kaupapahere mō te Whakatairanga Hauora(ngā inu hauora, te auahi kore me te momirehu kore, me te haumaru hihirā) - Health Promotion Policy (Healthy beverages, Smoke-free and Vape-free, and Sun Protection)</u>

1. He Kupu Whakataki - Introduction

Health outcomes are determined by the social and economic environment, the physical environment, and a person's individual characteristics and behaviours. The Palmerston North City Council (Council) shares a common interest with various government and non-government agencies in improving health outcomes for the people of Palmerston North. The 'social determinants of health' create a complex web around individuals and communities, making better health outcomes a multifaceted issue that requires systemic, multilevel solutions extending beyond the health sector alone¹⁵. While the Council does not have a formal role in health service delivery, it plays a crucial part in creating and promoting conditions that contribute to building healthy communities.

Council owns and/or administers land and facilities that are available for public use and enjoyment. Council is also an event provider in the City, and therefore, it has direct control on how these places and events are managed in a way that reflects community values and expectations.

2. Te Horopaki o te Rautaki - Strategic context

Our vision for our city is He iti rā, he iti pounamu - Small city benefits, big city ambition. Council seeks to fulfil this vision through four goals:

Whāinga 1: He tāone auaha, he tāone tiputipu

Goal 1: An innovative and growing city

Whāinga 2: He tāone whakaihiihi, tapatapahi ana

Goal 2: A creative and exciting city

Whāinga 3: He hapori tūhonohono, he hapori haumaru

Goal 3: A connected and safe community

Whāinga 4: He tāone toitū, he tāone manawaroa

Goal 4: A sustainable and resilient city

The Policy contributes to Whāinga 2: He tāone whakaihiihi, tapatapahi ana Goal 2: A creative and exciting city, and to the outcomes we want for our communities:

- o a vibrant city that connects people, and where creativity is built into our cityscape.
- access to exciting well-managed events and activities throughout the city and our neighbourhoods.

¹⁵ Community and Public Health Te Mana Ora. (2024). *Health in All Policies approach at Community and Public Health*. Community and Public Health Te Mana Ora. https://www.cph.co.nz/your-health/health-in-all-policies/

This policy also contributes to *Whāinga 3: He hapori tūhonohono, he hapori haumaru Goal 3: A connected and safe community,* and to the outcomes, where we want for our communities:

- o access to services and facilities that are inclusive and appropriate for their needs.
- o the support they want to live healthy lives.
- o access to safe and accessible community places.

This policy acknowledges the Tiriti partnership the Palmerston North City Council has with Rangitāne o Manawatū. Council staff meet regularly with iwi leaders and aim to ensure that Rangitāne values and perspectives have significant weight in decision-making.

Council also works actively with the wider Te Tihi o Ruahine Whānau Ora Alliance. This focus acknowledges the over-representation of Māori in negative health statistics and aims to contribute to improving these outcomes through strong Māori engagement and alignment with the strategic focus of the health sector. This focus includes the commitment to Te Ara Whānau Ora and its pathways to healthy and engaged whānau.

3. Te Pūtake - Purpose

The overarching purpose of the policy is:

To improve the health of Palmerston North residents and visitors by using the Council's influence to promote healthier lifestyle choices and prevent avoidable health issues.

4. Ngā Whāinga - Objectives

The policy is focused on three main health promotion areas *healthy beverages, smoke-free and vape-free, and sun protection.* Council has a history of encouraging healthier conditions, based on research that shows the concerning health outcomes in Palmerston North that stem from lifestyle behaviours.

This policy guides Council on how to influence healthy choices amongst community particularly through the design and management of public places and events to achieve the following objectives:

Healthy beverages

- Fewer people buy and consume sugar sweetened beverages¹⁶ at public places and events.
- Water becomes the preferred beverage of choice at public places and events.
- Palmerston North residents are aware of the adverse health effects of regularly consuming sugar sweetened beverages.
- There is less type two diabetes, and less tooth decay in children.

¹⁶ Sugar Sweetened Beverage is any beverage that has had calorific sweetener, usually sugar, added prior to sale. The Main categories of sugary drinks include but are not limited to carbonated soft drinks/fizzy drinks, sachet mixes, fruit drinks, cordials, flavoured milks, cold teas/coffees, and energy/sports drinks.

Smoke-free and vape-free

- Fewer people smoke and vape in public places and events.
- Businesses and other organisations designate their premises as "smoke-free and vape-free".
- Palmerston North is recognised both locally and nationally as a "smoke-free and vape-free city".
- There is less smoking and vaping among residents.
- Palmerston North achieves the 'Smoke-free 2025' goal¹⁷ for the city.

Sun protection

- Fewer people are exposed to excessive ultraviolet rays at public places and events.
- A sun-smart environment, and sun-protective behaviour are normalised.
- Palmerston North is recognised both locally and nationally as a "sun-smart city".
- The prevalence of skin cancers including melanoma amongst residents decreases.

5. Ngā Mātāpono - Principles

Council will apply the following principles when implementing this policy:

<u>Positive influence</u> – Council will support and encourage the community to make healthier choices through a positive and inclusive use of its influence.

<u>Conveniently healthy</u> – Council will support and encourage the community to make healthier choices by making healthier choices the easier choice.

<u>Responding creatively</u> – Council will support and encourage the community to make healthier choices by reimagining and redesigning the delivery of Council services. We will balance the varied community needs and wants with the objectives of this policy and the city's broader wellbeing goals.

<u>Collaborative action</u> – The Council will support and encourage the community to make healthier choices by working alongside other groups and organisations in health promotion. Each party will channel their respective strengths and areas of responsibility to maximise resources and achieve mutual goals.

6. Te Whānuitanga - Scope

The policy will apply to the following:

- a) Council administered public space including
 - 1. Parks
 - 2. Playgrounds
 - 3. Skate parks
 - 4. Sports grounds

¹⁷¹⁷ Government has set a goal so that by 2025 fewer than 5% of New Zealanders will be smokers.

5. Reserves

- b) Council public facilities including
 - 1. Aquatic Centres (Freyberg, Lido, Splashhurst)
 - 2. Bus terminals and bus stops
 - 3. Caccia Birch
 - 4. Central Energy Trust Arena
 - 5. Central Library and community libraries (Ashhurst, Awapuni, Te Pātikitiki Highbury and Roslyn)
 - 6. Civic Administration Building
 - 7. Community Centres
 - 8. Council Customer Service Centre
 - 9. Council's permanent depot sites and all recycling centres
 - 10. Globe Theatre
 - 11. i-Site Palmerston North
 - 12. Palmerston North Conference and Function Centre
 - 13. Regent Theatre
 - 14. Te Manawa Te Papaioea Palmerston North
 - 15. Wildbase Recovery Centre
 - 16. Youth Space
- c) Council-delivered community events.

7. Ngā Aratohu - Guidelines

Definitions

a) Sugar Sweetened Beverage (SSBs) is any beverage that has had calorific sweetener, usually sugar, added prior to sale. The main categories of sugary drinks include but are not limited to carbonated soft drinks/fizzy drinks, sachet mixes, fruit drinks, cordials, flavoured milks, cold teas/coffees, and energy/sports drinks.

Smoke-free and vape-free

- b) Council will designate the public places and events stated in clause 6. are designated smoke-free and vape-free.
- c) Council will install and maintain appropriate signage in te reo Māori and English at the public places stated in clause 6. to encourage users to be smoke-free and vape-free.

Sun protection

- d) Council will ensure appropriate sunshade available at the public places and events stated in clause 6.
- e) During the high ultraviolet radiation season, as far as reasonably practicable Council will encourage the scheduling of events defined at clause 6c. to occur outside the hours of 11am to 4pm.

- f) Council will provide accessible and free sun block stations available at events defined in clause 6c. scheduled between September to April (daylight saving months).
- g) Council will plan and implement a tree planting and maintenance programme to establish natural shade from the sun at the applicable sites.
- h) Council will conduct a shade audit on the applicable sites every three years to understand the level of shade available.

Healthy beverages

- The following beverages are recommended as a healthier choice of beverages to replace SSBs.
 - Water
 - Unsweetened milk
 - Artificially sweetened drinks
 - No-added-sugar juices
- j) Council will identify public spaces stated in clause 6a. that will be suitable for installing drinking water fountains and implement this over time.
- k) Council will provide easily accessible clean, safe, and free drinking water available at the public facilities and events stated in clause 6b. and 6c. except for bus terminals and bus stops.
- SSBs will not be sold on an ongoing, long-term basis at the public facilities listed in clause 6b., except for contractors at the following public facilities, who will have the option to voluntarily replace SSBs with the recommended beverages outlined in this policy until their contracts can be renegotiated to align with this policy:
 - 1. Aquatic centres (Freyberg, Lido, Splashhurst)
 - 2. Globe Theatre
 - 3. Regent Theatre
 - 4. Te Manawa Te Papaioea Palmerston North
 - 5. Council's permanent depot sites and all recycling centres
- m) Council-contracted vendors providing beverages for sale at the public facilities and events stated in clause 6b. and 6c. may sell the recommended beverages in clause 7i.
- n) Hot beverages and those that are subject to an age restriction are outside the scope of this policy.

Advocacy

o) Council will advocate to Government for changes to improve the physical health and wellbeing of Palmerston North residents and visitors in line with this Policy.

Health Promotion Reference Group

- p) Council will coordinate the health promotion reference group to guide the implementation of the policy and to:
 - Keep abreast of developments in the relevant health promotion areas;
 - Ensure a culturally sensitive response particularly for health concerns that disproportionately affect certain communities;
 - Ensure connections with Māori and Pacific providers and particularly for health concerns that disproprotionately affect these communities;
 - Take a joined-up approach and response to concerns affecting physical health and wellbeing locally and regionally.
 - Increase trust and transparency in working towards the policy objectives.
- q) Members of the reference group may include relevant staff from the following organisations and agencies including, but not limited to:
 - 1. Palmerston North City Council
 - 2. Horizons Regional Council
 - 3. Te Whatu Ora Health New Zealand Midcentral District
 - 4. central government agencies
 - 5. non-government health agencies
- r) Members of the Health Promotion Reference Group will meet at least three times a year to monitor policy implementation and to develop projects that will contribute to achieving the objectives of this policy.

Promotion and education

- s) Council will work with partner organisations to raise public awareness of this policy and provide information on support services and organisations to encourage help seeking behaviours.
- t) Council will include relevant health promotion messaging in line with this policy at the events stated in clause 6c. These messages will be communicated in pre-event promotion, and during the event.
- council will promote the purpose and objectives of this policy through its relevant relationships and encourage voluntary action to help achieve the policy objectives. This will Include the following relationships:
 - Sector leads
 - Grant recipients
 - Community organisations
 - Strategic partners
 - Commercial lease holders on Council owned premises

- Event providers
- Council venue hirers
- Central government counterparts.

8. Te Arotake - Review

The policy will be reviewed every four years, or earlier if requested by Council.

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NORTH

Te Kaunihera o Papaioea Palmerston North City Council

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