

**BEFORE HEARING COMMISSIONERS
FOR THE PALMERSTON NORTH CITY COUNCIL**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ
MO TE KAUNIHERA O PAPAIOEA**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change E: Roxburgh Residential Area to
the Palmerston North City Council District Plan

OPENING LEGAL SUBMISSIONS FOR PALMERSTON NORTH CITY COUNCIL

Dated: 19 May 2025



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MAY IT PLEASE THE COMMISSIONERS:

A. INTRODUCTION

- [1] Proposed Plan Change E – Roxburgh Residential Area (**PCE**) is a plan change to the Palmerston North City District Plan (**District Plan**), proposed under sch 1 to the Resource Management Act 1991 (**RMA**).
- [2] PCE is a relatively narrow plan change, seeking to rezone a small (4.5 hectare), discrete area of Palmerston North (the non-residential area surrounding Roxburgh Crescent) from a mixture of Industrial, Conservation and Amenity and Recreation Zones, to Residential Zone.¹
- [3] PCE, its provisions, and its overarching intent, are well described in the s 32 report,² and the experts' evidence.
- [4] To summarise, the site is primarily zoned Industrial currently, reflecting its use for business purposes (including the former Higgins Depot). However, the plan change area is flat, centrally located, and has access to green spaces (including the Manawatū River), public transport, schools and local shops, making it an ideal area for residential development. The primary landowner, Frances Holdings Ltd (**FHL**) is supportive of rezoning the area to residential.
- [5] As such, PCE has been prepared and notified as part of the Council's broader efforts to provide for additional housing supply in Palmerston North through amendments to the District Plan (see also Plan Change G: 'Aokautere Urban Growth' and Plan Change I: 'Increasing Housing Supply and Choice').
- [6] These submissions provide a high level overview of key matters remaining in contention in respect of the plan change, and are not intended to be a comprehensive response to all submissions or to repeat the evidence before the Panel.

B. LEGAL CONTEXT

- [7] The legal framework for plan changes is set out in ss 31, 32, 32A and 72–76 of the RMA. The mandatory requirements for district plans were set out

¹ PNCC *Proposed Plan Change E: Roxburgh Residential Area: Section 32 Evaluation Report (the Section 32 Report)*, Figure 1.

² Section 32 Report, Sections 2–3.

comprehensively by the Environment Court in *Colonial Vineyard Limited v Marlborough District Council*.³

- [8] When changing its Plan, the Council must do so in accordance with, relevantly, its functions under s 31 of the RMA; the provisions of Part 2; its obligation to have particular regard to an evaluation report prepared in accordance with s 32 of the RMA; any national policy statement, coastal policy statement, or planning standard; and any regulations.⁴
- [9] The Council must also have regard to, relevantly, any proposed regional policy statement; and any management plans and strategies prepared under other Acts to the extent that their content has a bearing on resource management issues of the district.⁵
- [10] A district plan must give effect to any national policy statement; any New Zealand coastal policy statement; and any regional policy statement.⁶
- [11] The Court in *South Epsom Planning Group Inc v Auckland Council* considered the requirements in ss 74 and 75 of the RMA, and provided a summary of those obligations:⁷

Apart from their formal requirements as to what a district plan must (and may) contain, those sections impose three sets of positive substantive obligations on a territorial authority when preparing or changing a plan. These are first to ensure the district plan or change accords with the authority's functions under section 31, including management of the effects of development, use and protection of natural and physical resources in an integrated way; second to give proper consideration to Part 2 of the RMA and the list of statutory documents in section 74 and section 75; and third to evaluate the proposed plan or change under section 32 of the RMA.

- [12] Finally, s 76 of the RMA provides that the Council may, for the purpose of carrying out its functions under the RMA and achieving the objectives and policies of the Plan, include rules in the Plan, and:

³ *Colonial Vineyard Limited v Marlborough District Council* [2014] NZEnvC 55. Noting that this needs to be read alongside amendments to the RMA, in 2013, 2017, and 2021.

⁴ RMA, s 74(1)

⁵ RMA, s 74(2).

⁶ RMA, s 75(3).

⁷ *South Epsom Planning Group Inc v Auckland Council* [2016] NZEnvC 140 at [19]; citing *Appealing Wanaka Incorporated v Queenstown Lakes District Council* [2015] NZEnvC 139.

- (4) A rule may –
 - (a) Apply throughout the district or part of a district:
 - (b) Make different provision for –
 - (i) Different parts of the district; or
 - (ii) Different classes of effects arising from an activity:
 - (c) Apply all the time or for stated periods or seasons:
 - (d) Be specific or general in its application:
 - (e) Require a resource consent to be obtained for an activity causing, or likely to cause, adverse effects not covered by the plan.

Section 32 assessment

- [13] In respect of the s 32 evaluation, the Panel must be satisfied that the objectives of the Plan Change are the most appropriate way to achieve the purpose of the RMA, and that the provisions are the most appropriate way of achieving those objectives.
- [14] PCE was notified with the required s 32 assessment, informed by technical advice, which is expanded on in Mr Guthrie's evidence. Taking into account all of the technical evaluations and weighing them against the provisions of the RMA, Mr Guthrie is of the view that PCE is the most appropriate way to achieve the purpose of the RMA, and the objectives of the District Plan.
- [15] Section 32AA of the RMA then requires a further evaluation to be conducted for any changes that have been made to, or are proposed for, the proposal since the original s 32 evaluation report for the proposal was completed. Mr Guthrie has undertaken a s 32AA analysis, which is set out in his s 42A reporting.

C. KEY ISSUES

- [16] A series of pre-hearing meetings have been held in respect of PCE – these are outlined in Mr Guthrie's s 42A report, to which the notes from those meetings are also attached. These meetings, and the evidence exchange process, have narrowed the key matters remaining issue between the Council and submitters.

- [17] In summary, the key issues remaining include:
- (a) The stormwater management approach in the proposed provisions;
 - (b) The level of directiveness in the structure plan, and whether this is appropriate – in particular, at issue is the need for the northern portion of Road ‘B’ and the location of the reserve within the Structure Plan;
 - (c) The related question of the density controls included in PCE.
- [18] Submitters have raised a variety of other important and relevant issues beyond the above – these are outlined and addressed in the s 42A reporting of Council’s experts, in reply evidence, and in the officer recommendations in response to submissions.⁸ These include (inter alia) parking, flooding, and the effects on Tilbury Avenue properties. Many of these issues have been explored in the pre-hearing meetings, with some also the subject of technical evidence. There have also been matters raised by Ms Watson in exchanges with Council officers following the filing of s 42A reports – particularly with respect to effects on Tilbury Avenue properties.⁹
- [19] While many of these issues appear to have been largely resolved through the further work and reporting of officers, Council officers are aware that not all submitters have filed evidence. Council’s experts will listen to and consider any further comments from submitters and the Panel on those topics over the course of the hearing and will comment in their right of reply as necessary.

Stormwater management

- [20] The main issues raised in respect of the stormwater management provisions of PCE are from Mr Thomas, the planning expert for FHL.
- [21] Mr Thomas makes two main propositions in respect of these provisions:
- (a) The initial Stormwater Servicing Report appeared to state that upgrading the existing stormwater outfall servicing the plan change area would be enough to manage stormwater to an AEP 10% standard. Later documents have shown that a new DN900 pipe is proposed in addition to the existing outfall which, in Mr Thomas’s

⁸ See Section 42A Report of Eamon Guthrie (24 April 2025) at Appendix 1.

⁹ A series of specific queries and points were raised by Ms Watson directly with Council officers, rather than in evidence. These are addressed in Statement of Reply Evidence of Eamon Guthrie (16 May 2025) at 80–95; and in the expert opinions referenced there.

view, will mean the network can now deal with much more than the intended 10% AEP event. On that basis, he recommends a series of amendments to the PCE provisions, including relaxing the impervious surfaces standards in PCE, to provide additional section development options.

- (b) The appropriate time for the management of stormwater is at the time of subdivision, and a stormwater management plan could be prepared at that stage, rather than relying on controls at the land use stage (such as the permeability standards). This would still provide for holistic stormwater management, and would avoid the need for (what Mr Thomas says is) the overly restrictive 45% permeability requirement in r 10.6.1.8(d), which applies where development proceeds in advance of the planned stormwater upgrades.

[22] Mr Thomas proposes a variety of changes to the PCE provisions as a result, including (among other things) the deletion of Objective 17 in Chapter 10 and its associated policies, the removal of permeability standards from Chapter 10, and removal of the reference to water sensitive design principles in Objective 11 of Chapter 7.

[23] Ms Wood does not agree with Mr Thomas's assessment, noting that:

- (a) As a general proposition, larger pipes for servicing a wider catchment area does not necessarily equate to additional 'spare' capacity for the Plan Change area.¹⁰
- (b) More importantly though, the conclusions in the Stormwater Servicing Report were *not* premised on a single upgrade to the outfall but considered options (such as duplicate pipe network) to meet the requirements of the wider catchment, not only the PCE area.¹¹
- (c) The capacity assessments in the Stormwater Servicing Report took into account the anticipated 30% permeability from the Plan Change area, and therefore that allowance has already been incorporated into the sizing of the outfall and other upgrades.¹²

¹⁰ Statement of Reply Evidence of Mary Wood (16 May 2025) at 10.

¹¹ Statement of Reply Evidence of Mary Wood (16 May 2025) at 11–12.

¹² Statement of Reply Evidence of Mary Wood (16 May 2025) at 10.

- [24] In relation to the staging of permeability requirements of PCE (45% before completion of the stormwater network upgrades and 30% after), Ms Wood has previously highlighted that the timing as to when the network upgrade works could be consented and constructed is uncertain, so the interim 45% permeability limit is required to manage runoff from the plan change area to a level that aligns with the available pipe capacity.¹³
- [25] On Mr Thomas's point that stormwater is better managed by way of a stormwater management plan at the subdivision stage than a 30%/45% permeability standard, Mr Guthrie observes that management at both the subdivision and land use stage are required. He notes that some water sensitive design elements are covered at the time of subdivision, like the location of rapid infiltration stormwater pits, while onsite permeability is managed at land use stage.¹⁴ Bearing in mind the importance of stormwater management for the PCE area, a combination of both methods is needed.
- [26] Additionally, if those permeability limits cannot be achieved, flexibility already exists in the PCE provisions for alternative solutions as long as the same flowrate is achieved.¹⁵
- [27] It is therefore the Council's view that the permeability standards are appropriate and justified from a technical perspective.
- [28] From a planning perspective, the evidence on behalf of Horizons Regional Council, notes that the regional policy statement requires that:¹⁶
- urban environments are developed in ways that ... improve resilience to the effects of climate change by ... use of urban design, building form and infrastructure to minimise as far as practicable the contribution to climate change of the development and its further use, including ... water-sensitive design and nature-based solutions ...
- [29] In Mr Wickramasinghe's view, the permeability standards (and related objectives and policies) of PCE give effect to that provision of the regional policy statement, as well as the NPSUD and the NPSFM.¹⁷ Mr Guthrie agrees.¹⁸

¹³ Statement of Evidence of Mary Wood (22 April 2025) at 97.

¹⁴ Statement of Reply Evidence of Eamon Guthrie (16 May 2025) at 34.

¹⁵ Statement of Evidence of Mary Wood (22 April 2025) at 97.

¹⁶ One Plan, RPS-UFD-P8(1).

¹⁷ Statement of Evidence of Aruna Wickramasinghe (8 May 2025) at 24.

¹⁸ Statement of Reply Evidence of Eamon Guthrie (16 May 2025) at Section C.

[30] As such, looking at the stormwater management provisions of PCE as a whole, the Council considers that they:

- (a) Implement the relevant provisions of the regional policy statement, the NPSUD and the NPSFM;
- (b) Address existing network capacity issues in the plan change area; and
- (c) Provide for the holistic management and mitigation of stormwater and flooding effects from both subdivision and land use.

[31] The conclusions on network capacity and effects are supported by the uncontested expert evidence of Ms Wood and Ms Demado.

[32] For those reasons, it is submitted that the PCE stormwater management provisions should be retained, as amended by Mr Guthrie's reply evidence.

Structure Plan requirements

[33] Mr Thomas supports the use of a structure plan to guide development, however, considers that the PCE Structure Plan is "*very detailed in nature given the small size of the redevelopment area*". This may result, in Mr Thomas's view, in a lack of flexibility to accommodate alternative design concepts for the plan change area.

[34] FHL has also provided evidence on urban design matters from Ms Blagrove and Ms Devereux. They agree with Mr Thomas, saying that they also consider that the Structure Plan is disproportionately prescriptive for the size of the plan change area.

[35] Mr McDonald makes a number of points in response to this. In his view, the site constraints present in Roxburgh Crescent make the exact opposite point true – the very specific conditions encountered at Roxburgh Crescent (an irregularly shaped plan change area, a poorly developed path network, an existing primary thoroughfare, a river corridor interface) necessitate a particular planning response if good urban design outcomes are to be realised.¹⁹

¹⁹ Statement of Reply Evidence of Chris McDonald (16 May 2025) at 10.

- [36] Additionally, it is not clear what the claims of ‘disproportionate’ prescriptiveness are being measured against. As Mr McDonald highlights, PCE is no more detailed than other recent changes to the Council’s plan involving structure plans, such as Mātangi.²⁰
- [37] It is worth noting that Mr Slyfield refers to much the same point as Mr Thomas in his submissions, stating that “*it is critical that the plan change provides a framework that is devoid of unnecessary restrictions, and sufficiently flexible to enable development that is commercially realistic*”.
- [38] The Council would first note that it does not consider any of the elements of the Structure Plan to be “*unnecessary restrictions*”. Mr McDonald notes that the Structure Plan aims to achieve a series of eight principles, none of which are fanciful or greatly in excess of what would be expected of redevelopments elsewhere in the City:²¹
- (a) New and existing thoroughfares combine to form a path network.
 - (b) The path network provides good internal and external connectivity.
 - (c) The plan improves physical and visual links to the river corridor.
 - (d) Public open space and river access are co-located at the plan’s centre.
 - (e) A high-quality public realm adds value to residential properties.
 - (f) A prescribed street layout supports compact street-facing lots.
 - (g) Planning provisions enable higher yield and a range of dwelling types.
 - (h) Positive relationships exist between the public and private realms.
- [39] In any case, when considering a plan change, the Council must balance a wide range of considerations pursuant to its statutory obligations, which may not always align with commercial objectives.²² It is therefore not correct to say that the Council must submit to a developer’s view of what would be “*commercially realistic*”. The proper test of a plan change is whether it

²⁰ Statement of Evidence of Chris McDonald (23 April 2025) at 30.

²¹ Statement of Evidence of Chris McDonald (23 April 2025) at 24; and McIndoe Urban Roxburgh Crescent: Urban Design Report (11 January 2024) at 3.3.

²² *Long Bay-Okura Great Park Society v North Shore City Council* EnvC Auckland A078/08, 16 July 2008 at [296].

achieves integrated management of natural resources,²³ and that will often (as it does here) take the balancing of a number of interests.

- [40] Moving to a distinct but related issue with the Structure Plan for FHL: the location and nature Local Street B. Mr Thomas, Ms Blagrove, and Ms Devereux consider that the Structure Plan ought to provide for alternative designs for the northern portion of the plan change area, as a result of the unusual geometry of that area. Ms Blagrove and Ms Devereux go on to suggest that the northern portion of Local Street B could be shown as an 'optional road' in the Structure Plan.
- [41] At the outset, the Council does not support Local Street B (in whatever form) only being an 'optional' road. Specifying an 'optional' road is ultimately an invitation for no road to be provided at all, which would result in poor connectivity and safety outcomes.²⁴
- [42] A series of rights of way or cul-de-sacs would also be undesirable for reasons of permeability and safety.²⁵
- [43] A laneway option has been considered by officers given the evidence of Mr Thomas. While a lane alignment as previously proposed in an earlier (2021) version of the Structure Plan could possibly work, there are limitations, and it is not either Mr McDonald's or Mr Groom's preferred option.²⁶
- [44] Mr McDonald considers a lane to be a less effective use of the land than what is currently proposed in the Structure Plan – being Local Street B. For ease of reference, Mr McDonald notes:²⁷
- (a) Continuity between the northern and southern arms of Local Street B contributes to the spatial integrity of the plan change area.
 - (b) A street is unambiguously public and sends a clear message about freedom of access, 'address' and 'front-of-house' activities. Conversely, lanes can be communally owned and frequently express the private character of rear yards.

²³ RMA, ss 5 and 32(1)(a).

²⁴ Statement of Reply Evidence of Chris Groom (16 May 2025) at 19; and Statement of Reply Evidence of Eamon Guthrie (16 May 2025) at 58.

²⁵ Statement of Reply Evidence of Chris Groom (16 May 2025) at 11.

²⁶ See Figure 1 of Statement of Reply Evidence of Chris McDonald (16 May 2025); Statement of Reply Evidence of Chris Groom (16 May 2025) at 11-13.

²⁷ Statement of Reply Evidence of Chris McDonald (16 May 2025) at 17.

- (c) As well as serving as a pathway, a street provides carparking and contributes to stormwater management. These ancillary functions are more difficult to accommodate on a lane.
 - (d) As a landscaped corridor, a street augments private open space especially within higher-density developments comprised of compact lots. Owing to its modest cross-section, a lane offers fewer opportunities for planting and makes less contribution to visual amenity.
 - (e) As a 13m wide landscaped corridor, Local Street B mediates effectively between three-storey riverfront housing and two-storey dwellings elsewhere in the plan change area. By comparison, a lane allows a more direct relationship between different scales and housing types.
- [45] Having regard to Mr McDonald and Mr Groom's advice on the matter, Mr Guthrie has recommended retaining Local Street B in the Structure Plan. In his view this roading option is safer, encourages active transportation, and provides for a well-connected residential area.²⁸
- [46] The experts for FHL have also sought flexibility in terms of the location of the reserve central to the Structure Plan – specifically, the 'possibility of locating the reserve on the north side of Road D as an alternative to the south'.²⁹ The Council experts are not necessarily opposed to a reserve being located on the north side of Road D (with some qualifiers³⁰), however, the land has been the subject of to a separate public statutory reserve process, with its own conditions.³¹ As highlighted by Mr Guthrie there may be opportunity to provide a future pathway for a reserve located on the north side of Road D (with some flexibility in location provided in the Structure Plan and accompanying plan framework), but the Structure Plan should continue to show the location of the reserve as presently approved by the Department of Conservation.
- [47] To provide some final framing comments in respect of the Structure Plan, it is observed that Mr Thomas critiques the Structure Plan as being put forward as 'optimal', saying that this is not required by the RMA, and may not align

²⁸ Statement of Reply Evidence of Eamon Guthrie (16 May 2025) at 59.

²⁹ Statement of Evidence of Paul Thomas (8 May 2025) at 27.

³⁰ For example, see Statement of Reply Evidence of Chris McDonald (16 May 2025) at [61] and Statement of Reply Evidence of Aaron Phillips (16 May 2025) at [12].

³¹ Statement of Reply Evidence of Aaron Phillips (16 May 2025).

with what is commercially preferable. The apparent implication of this is that the Structure Plan is full of ‘nice to haves’ – an ‘ideal’ vision for the area, rather than a practical one. However, as Mr McDonald neatly puts it:³²

... the proposed Structure Plan is ‘optimal’ only in the sense that it reconciles good urban design with multiple constraints and competing public and private interests. In my opinion, it is a pragmatic ‘bare bones’ structure plan, although the bones are good ones for intensive residential development and a range of housing types.

- [48] In reality, the Structure Plan balances key social, environmental, and design outcomes to achieve an efficient and effective outcome from redeveloping the plan change area as residential. This is precisely what the RMA requires from the Council when it prepares plan changes.³³

Density

- [49] Finally, Mr Thomas reiterates the request from FHL’s submission that the maximum lot size be increased from 500 to 600m². The reasoning provided for this is that Mr Thomas perceives a shortage of larger sections in the inner urban area (referencing the infill housing to be provided for under Plan Change I), and therefore providing for slightly larger sections in the plan change area would fill a gap in the market.
- [50] Reporting officers do not agree. Development of Roxburgh Crescent is guided to smaller lots for sound reasons:³⁴
- (a) The Council’s future development strategy specifically outlines that there is a market shortfall of lower-medium lot and dwelling sizes in the existing urban area. PCE was identified as a plan change which would assist with meeting these housing targets of lower to medium lot sizes within 3–10 years.
 - (b) In the existing and upcoming housing stock of the City, there is no real shortfall of larger houses. 3–4 bedroom houses compromised 77% of new residential buildings, and in 2018 they made up 69% of total private occupied dwellings in Palmerston North.

³² Statement of Reply Evidence of Chris McDonald (16 May 2025) at 41.

³³ RMA, s 32(1) and (2).

³⁴ Statement of Reply Evidence of Eamon Guthrie (16 May 2025) at 40–43.

- (c) A key outcome for PCE is to respond to a market shortfall of lower-medium lot and dwelling sizes.

- [51] As recognised by Ms Blagrove and Ms Devereux, the difference between a 500m² and 600m² maximum lot size is ultimately a policy choice between increased intensification and greater flexibility in housing typologies.³⁵ The Council considers pursuing the former better aligns with its strategic direction, better gives effect to higher order policy (i.e., the NPSUD), and makes sense for this redevelopment site.
- [52] Additionally, in Mr McDonald's view, allowing 600m² lots would not add to the variety of dwelling types built within the plan change area – rather, the change could reduce development opportunities for semi-detached and fully attached dwellings because these housing types suit smaller lots.³⁶
- [53] In any case, oversize lots are also not prohibited under PCE. Mr Guthrie notes that if developers wish to create lot sizes greater 500m², there is a discretionary consenting pathway for this.³⁷ A developer's option to develop larger lots is not unduly constrained – provided that the objectives and policies of PCE are still met.
- [54] Overall, it is submitted that the provisions guide a consent applicant to an appropriate level of intensification, which is consistent with higher order policy direction, while still providing opportunity for alternative design, where that achieves the other outcomes intended by PCE. It is submitted that the maximum lot size provisions are therefore appropriate as currently drafted.

D. EFFECTS

- [55] The functions of Council, as set out in s 31 of the RMA, include the establishment, implementation and review of objectives, policies and methods to:
- (a) Achieve integrated management of the effects of the use, development and protection of land and associated natural and physical resources;³⁸ and

³⁵ Statement of Evidence of Katherine Blagrove and Jaime Devereux (5 April 2025) at 2.13.

³⁶ Statement of Reply Evidence of Chris McDonald (16 May 2025) at 35.

³⁷ Statement of Reply Evidence of Eamon Guthrie (16 May 2025) at 46.

³⁸ RMA, s 31(1)(a).

- (b) Ensure that there is sufficient development capacity in respect of housing and business land to meet expected demands of the City.³⁹

[56] The Council also has the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of the avoidance or mitigation of natural hazards and the maintenance of indigenous biodiversity;⁴⁰ and the emission of noise and its mitigation.⁴¹

[57] As noted above, these submissions do not repeat the evidence – the Council's experts will speak to that over the first part of this hearing. However, the Council's position is that actual and potential effects of PCE have been considered through the development of the plan change, assessed, and addressed in detail. It is also comfortable that the key matters addressed above, and any other unresolved issues from submitters, have been addressed through evidence, including reply, or submissions.

[58] Overall, it is submitted that the proposed provisions accord with Council's functions to provide for integrated management of effects.

E. CONCLUSIONS AND WITNESSES

[59] PCE provides for redevelopment of the Roxburgh Crescent area in accordance with a sensible Structure Plan which addresses and manages the various constraints of the site. Implementation of PCE, as proposed by the Council, will deliver both additional housing and well connected, high-amenity urban surrounds, further delivering on the Council's ongoing requirement to develop well-functioning urban environments.

[60] The following reporting officers will be presenting evidence to the Panel:

- (a) Mr Chris McDonald and Mr David Charnley – Urban Design;
- (b) Mr Chris Groom – Transport;
- (c) Ms Mary Wood – Stormwater and flooding;
- (d) Mr Aaron Phillips – Parks and reserves;
- (e) Mr Sean Syman – Noise;

³⁹ RMA, s 31(1)(aa).

⁴⁰ RMA, s 31(1)(b).

⁴¹ RMA, s 31(1)(d).

(f) Mr Eamon Guthrie and Ms Andrea Harris – Planning.

Dated 19 May 2025

A handwritten signature in blue ink, consisting of a stylized, cursive 'S' shape with a loop at the top and a horizontal line extending to the right.

Shannon Johnston / Alexander Sinclair
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