

BEFORE THE PALMERSTON NORTH CITY COUNCIL

IN THE MATTER OF the Resource Management Act 1991

AND

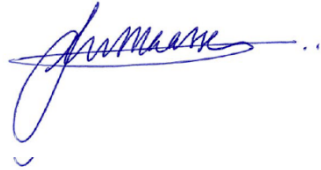
IN THE MATTER OF an application by the Anglican Diocese of Wellington for the refurbishment, strengthening and extension to the heritage listed building known as All Saints Church, 338 Church Street, Palmerston North

**MEMORANDUM OF COUNSEL FOR THE APPLICANT ON
SEISMIC ISSUES
DATED 25 JANUARY 2021**

MAY IT PLEASE THE PANEL:

[1] The Applicant requests the following information from the Mr Clark at the Council:

- (a) When is an earthquake prone notice (EPN) likely to issue against the All Saints Church now that a year has expired from EPN letter dated 14 November 2019?
- (b) Since the Council's EPN dated 14 November 2019 was not disputed does the Council accept the seismic risks to public safety identified in the evidence of Mr Newton?



John Maassen
Counsel for the Applicant