



---

**PALMERSTON NORTH CITY COUNCIL**

---

**AGENDA**

**EXTRAORDINARY COMMUNITY  
DEVELOPMENT COMMITTEE**

---

**1.00PM, TUESDAY 25 FEBRUARY 2020**  
COUNCIL CHAMBER, FIRST FLOOR, CIVIC ADMINISTRATION BUILDING  
32 THE SQUARE, PALMERSTON NORTH

---



---

## MEMBERSHIP

---

**Lorna Johnson (Chairperson)**

**Rachel Bowen (Deputy Chairperson)**

**Grant Smith (The Mayor)**

**Brent Barrett**

**Susan Baty**

**Zulfiqar Butt**

**Renee Dingwall**

**Lew Findlay QSM**

**Patrick Handcock ONZM**

**Leonie Hapeta**

**Danielle Harris**

**Billy Meehan**

**Karen Naylor**

**Bruno Petrenas**

**Aleisha Rutherford**

**Agenda items, if not attached, can be viewed at:**

[pncc.govt.nz](http://pncc.govt.nz) | Civic Administration Building, 32 The Square  
City Library | Ashhurst Community Library | Linton Library

---

**Heather Shotter**

**Chief Executive, Palmerston North City Council**

**Palmerston North City Council**

W [pncc.govt.nz](http://pncc.govt.nz) | E [info@pncc.govt.nz](mailto:info@pncc.govt.nz) | P 356 8199

Private Bag 11034, 32 The Square, Palmerston North





## **EXTRAORDINARY COMMUNITY DEVELOPMENT COMMITTEE MEETING**

25 February 2020

### ***MEETING NOTICE***

Pursuant to Clause 21 of Schedule 7 of the Local Government Act 2002, I hereby requisition an extraordinary meeting of the Council to be held at 9.00am on Tuesday, 25 February 2020 in the Council Chamber, first floor, Civic Administration Building, 32 The Square, Palmerston North, to consider the business stated below.



**MAYOR**

### **ORDER OF BUSINESS**

- 1. Apologies**

**2. Notification of Additional Items**

Pursuant to Sections 46A(7) and 46A(7A) of the Local Government Official Information and Meetings Act 1987, to receive the Chairperson's explanation that specified item(s), which do not appear on the Agenda of this meeting and/or the meeting to be held with the public excluded, will be discussed.

Any additions in accordance with Section 46A(7) must be approved by resolution with an explanation as to why they cannot be delayed until a future meeting.

Any additions in accordance with Section 46A(7A) may be received or referred to a subsequent meeting for further discussion. No resolution, decision or recommendation can be made in respect of a minor item.

**3. Declarations of Interest (if any)**

Members are reminded of their duty to give a general notice of any interest of items to be considered on this agenda and the need to declare these interests.

**4. Public Comment**

To receive comments from members of the public on matters specified on this Agenda or, if time permits, on other Committee matters.

(NOTE: If the Committee wishes to consider or discuss any issue raised that is not specified on the Agenda, other than to receive the comment made or refer it to the Chief Executive, then a resolution will need to be made in accordance with clause 2 above.)

**5. Draft Local Alcohol Policy - Submissions**

Page 7

**6. Confirmation of Minutes**

Page 211

"That the minutes of the Community Development Committee meeting of 5 February 2020 Part I Public be confirmed as a true and correct record."

**7. Draft Local Alcohol Policy 2020 - Summary of Submissions**

Page 217

Memorandum, presented by Julie Macdonald, Strategy & Policy Manager.

## 8. Exclusion of Public

To be moved:

“That the public be excluded from the following parts of the proceedings of this meeting listed in the table below.

The general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under Section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Ground(s) under Section 48(1) for passing this resolution

This resolution is made in reliance on Section 48(1)(a) of the Local Government Official Information and Meetings Act 1987 and the particular interest or interests protected by Section 6 or Section 7 of that Act which would be prejudiced by the holding of the whole or the relevant part of the proceedings of the meeting in public as stated in the above table.

Also that the persons listed below be permitted to remain after the public has been excluded for the reasons stated.

*[Add Third Parties]*, because of their knowledge and ability to assist the meeting in speaking to their report/s [or other matters as specified] and answering questions, noting that such person/s will be present at the meeting only for the items that relate to their respective report/s [or matters as specified].





## SUBMISSION FROM CONSULTATION

**TO:** Community Development Committee

**MEETING DATE:** 25 February 2020

**TITLE:** Draft Local Alcohol Policy - Submissions

### RECOMMENDATION(S) TO COMMUNITY DEVELOPMENT COMMITTEE

1. That the Committee hear submissions from presenters who indicated their wish to be heard in support of their submission.
2. That the Committee note the Procedure for Hearing of Submissions, as described in the procedure sheet.

### SUBMITTERS WISHING TO BE HEARD IN SUPPORT OF THEIR SUBMISSION

1.	Albert Sports Bar, Royal Hotel
2.	BAS (PN) Ltd
3.	Cancer Society of New Zealand Manawatu Centre Inc.
4.	Orlando Country
5.	Jules Grace
6.	Reuben Takarua
7.	Let the Children Live Group
8.	Health Promotion Agency Te Hiringa Hauora
9.	MidCentral DHB Public Health
10.	Brew Union Brewing Co.
11.	The Fish Bar Ltd
12.	P R Attractions Ltd (Bubbles Bar)
13.	Manawatu Chamber of Commerce

14.	Hospitality New Zealand Palmerston North
15.	General Distributors Ltd
16.	Alcohol Healthwatch Trust
17.	Palmerston North Safety Advisory Board
18.	The Palmy BID
19.	George Hospitality Group
20.	The Speights Ale House Palmerston North
21.	Masonic Hotel

### **ATTACHMENTS**

1. Submissions [↓](#) 
2. Procedure for Hearing of Submissions [↓](#) 



Merle Lavin

From:

Submission

Subject:

FW: Draft local alcohol policy submission

### Your contact details

Full name

Amanda Sergent

### Hearings

Do you want to speak to the Council in support of your submission?

No

### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Closing at 2am has been trialled before and it Did not work, the hours got changed back to 3am, closing a 2am will do absolutely nothing to help the pre loading of patrons, Palmerston North night life is already restricted, let's keep Palmy slightly more appealing by keeping our bars open until 3am.

### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

1-2

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

Merle Lavin

2-1

13995524

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Maysen Summer Keefe

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I don't know/no opinion

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

I believe keeping it at a later time will let those who cannot go out during weekdays have fun out of working days/hours. Taking away more freedom will cause people to go against the new rules and ministry etc will blame the public because of the rules they set. I do not agree with these terms although it did cross my mind as a good thought

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:



2-2

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I don't know/no opinion

Please provide any comments below:

Set time entry is a good way to keep late night trouble away from clubs

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

Merle Lavin

3-1

13996031

From: Submission  
Subject: FW: Draft local alcohol policy submission

**Your contact details**

Full name  
Sean Pirie

**Hearings**

Do you want to speak to the Council in support of your submission?  
No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

This is the dumbest idea I have seen, did you not learn your lesson last year when you tried this. All this policy will do, will cause people to start drinking early and have multiple fights at 2am from the hundreds of drunk people leaving at the same time just like the last trial. Again this is the dumbest idea and I know that the bar owners in Palmy will not agree with this policy it's dumb

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Again this is dumb and will just cause more fights in town

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

3-2

Please provide any comments below:

Wow a good idea I'm amazed

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

I only support this if this policy starts after 2am or 3am

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

This policy is dumb don't even think about doing this please



Merle Lavin

4-1

13998164

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Dan Wilson

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

This is wasting ratepayers money. There is no change needed. It will not change behaviours. Only ones that will hurt are our local employers

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

This is wasting ratepayers money. There is no change needed. It will not change behaviours. Only ones that will hurt are our local employers

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:

4-2

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

5-1

Merle Lavin

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
 Sara Wills

**Organisation**  
 Aubyn Court Spa Motel

#### Hearings

Do you want to speak to the Council in support of your submission?  
 No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I don't know/no opinion

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this

Please provide any comments below:

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:

S-2

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

**Other comments**

**Do you have any other comments or suggestions to make?**

It is my opinion that the Council be as strict as possible on alcohol related licensing. The majority of problems that my business experiences are related to guest disturbance due to (what is assumed) alcohol & drug fueled behavior. Examples include: Noise disturbances when intoxicated individuals are walking past my motel complex at night Noise disturbances caused by regular parties that are held in close vicinity to my motel complex Littered cans & bottles in my motel complex Disturbances caused by my own intoxicated motel guests I would like to think that by reducing access to alcohol there would be some sort of reduction of these disturbances that negatively impact on my business.

6-1 13997938

**Merle Lavin**

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
 Gwendolyn Davis

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
 No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

#### One-way door restrictions

6-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

I worked in an establishment as a duty manager where we had a one way door out the back from 9pm. We had bouncers on busy nights on all doors but having this one way door policy was extra security and control for those quieter nights.

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

Support bars as they are the ones who are working with the councils to control the sale and supply of liquor. If you want to stop pre loading look more closely at the businesses that sell liquor off licence or better yet raise the legal drinking age??

Merle Lavin

7-1

13997250

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
Hope Rochelle Eileen Zoie

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I don't know/no opinion

**Please provide any comments below:**

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this

**Please provide any comments below:**

Good idea, studies have shown clearly most of the problems happen after 3am. In saying that staggered closing times also would be a good idea because when drunk people all come out at once that's usually when stuff goes down. After many years working as a eyes and ears for council city ambassador 2012-2017 working on the beat 6pm-4am helping council reporting stats that's my observation. Earlier is good but staggered hours if possible.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

7-2

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

We should have freedom

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

There are a lot of not so good intentioned bar managers out there. I think there should be some conditions available to access for those who have broken the rules in the past on numerous occasions.

#### Other comments

Do you have any other comments or suggestions to make?

There should be more training taken for bar staff and doorman to detect when someone is in the vulnerable position for example if a girl has their eyes closed and the guy is carrying her away from the bar someone should stop and ask the girl if they know who they are with.. if she is too drunk to answer checking that she is safe. Apps to connect friends when they seporate during the night. (Safety app) Password for bar staff to understand there are certain words that a girl can as a password to staff signals to staff for help without saying help.. womens toilets is a great place to promote password safety notices.



Merle Lavin

8-1

13999543

From:

Submission

Subject:

FW: Draft local alcohol policy submission

### Your contact details

Full name

Kieran Peters

### Hearings

Do you want to speak to the Council in support of your submission?

No

### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

I feel more bars and pubs are needed in Palmerston North to ensure a vibrant nightlife for its students. We pride ourselves on being "Student City" we however offer little to no after hours entertainment for our young population.

### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

I feel closing bars earlier will just discourage people going out all together and you will have more issues with people at house parties tying up valuable police resources. Preloading is done before town so you don't have to buy overpriced drinks in town not because of the hours a place is open. If anything we should try and lower the prices at bars and encourage some sort of nightlife back to the City.

### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

8-2

I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

Merle Lavin

9-1

13998637

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Jonty Robinson

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I don't know/no opinion

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:

#### One-way door restrictions

9-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

For those who work late after doing theatre shows, this could really screw over if they want to have a drink after

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

Merle Lavin

10-1

13997341

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
 Khurrum Mughal

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
 Yes

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Not a good idea, night life in palmy is already dead as compare to couple of years back. The most important to restrict the entry time in bars. At present bars close at 3pm, therefore, after 230am no one allowed to enter in to bars. If someone leaves bar at 230am then he has no choice except to go home. Using alcohol outside permitted places, should be heavily fined. Just split the alcohol on road and let them go is not sufficient.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

10-2

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

Very much important to keep eye on every single entry, specifically if you restrict the entry by 230am and they can stay till 3am.

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

Night life is dead in palmy, please don't destroy it all.

Merle Lavin

11-1

14001438

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

### Your contact details

**Full name**  
 Sukhpreet

### Hearings

**Do you want to speak to the Council in support of your submission?**  
 No

### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this

Please provide any comments below:

### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

### One-way door restrictions

11-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?



**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

Full name  
Tesla

#### Hearings

Do you want to speak to the Council in support of your submission?  
No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.  
I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.  
I oppose this

Please provide any comments below:  
Don't be ridiculous.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

12-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Braedon R

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Wont change anything in relation to patrons "preloading" . Just sounds like any reason to make hardworking bars close one hour earlier so the council doesn't have to send police down town street in the early hours.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:

13-2

### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

### Other comments

Do you have any other comments or suggestions to make?

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Becky lewell

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

This has been trialed before and made no difference! Leave it how it is! Places in Auckland and Wellington don't close till 4am! 3am is reasonable and earlier just spoils the fun of those enjoying a night out!

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

14-2

### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

### Other comments

Do you have any other comments or suggestions to make?

15-1 13998742

**Merle Lavin**

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
 Rosalee McBeth

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
 No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

#### One-way door restrictions

15-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?



Merle Lavin

16-1

13998159

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Savannah Redmond

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

This is ridiculous it's been tried before and didn't work, will just encourage people to go to different cities for a good night, plus people like myself who work in hospitality til 11 on a Saturday night have no time to enjoy the rest of their evening. This will encourage drinking else where with after parties more so than what they are now resulting in more noise complaints being made even further throughout the next morning.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

16-2

### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

### Other comments

Do you have any other comments or suggestions to make?

Merle Lavin

17-1

13998842

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Jean archer

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Closing an hour earlier will have absolutely no impact on preloading. In my view it would just introduce more after parties. Not completely opposed to the idea of an earlier close but I don't think lots being considered for the right reasons. Also, Palmy should be a cool place with culture and entertainmet and more nightlife if anything.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

17-2

### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

### Other comments

Do you have any other comments or suggestions to make?

Merle Lavin

18-1

13999541

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Ben Foster

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

I feel that this would boost the appeal for students to come to or stay Palmy - Palmy is a supposed student city but offers very little nightlife at all and is a common complaint of my student friends; there is only one, grotty, nightclub in town, and the few bars nearby are often full of non-students which pushes students away (as viewed from personal experience and that of student friends). So, more licences might mean more variety for students, and the establishment of student bars which would attract/ retain students in Palmy.

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Currently as a student, we would pre-drink at a flat from between 6pm-8pm til about 11-midnight where we will leave to go to town. If the policy is implemented, we would likely still leave the pre-drinks at the same time but knowing that we would spend one less hour in town (which is one less hour of being able to buy drinks in town) we would likely pre-drink more to make up for the absence of town-drinks. We may even decide not to go to town at all as we do not see its worth going (especially when taxis cost so much) when the bars close an hour early and thus leave us with less time.

18-2

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

Student life in-general in Palmy is quite plain so I hope something comes of this

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

Full name  
Mike Dixon

#### Hearings

Do you want to speak to the Council in support of your submission?  
No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

This will not affect the "preloading" issue, just force punters to preload an hour earlier. Staggered closing times will be more effective at reducing trouble spots and bottlenecks with Police resources at 3.00am for example

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

Liquor licences should not be issued for areas zoned Residential. Should only be for Commercially zones areas

19-2

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

**Please provide any comments below:**

This should be proposed. As a former hospitality worker I can see enormous benefits in bars having a one way door policy one hour before closing to reduce trouble and drunkenly behaviour

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

**Please provide any comments below:**

The discretionary conditions for licences should include a provision to supply food to patrons

**Other comments**

**Do you have any other comments or suggestions to make?**

Maybe the Council should consider a bylaw putting the on licence drinking age back up to 20. People younger than this are not responsible enough.



20-1  
13998841

**Merle Lavin**

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
Liam Cann

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

**Please provide any comments below:**

I believe reducing the opening hours of any liqueur provider is a good thing.

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this

**Please provide any comments below:**

I believe reducing the opening hours of any liqueur provider is a good thing.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

**Please provide any comments below:**

#### One-way door restrictions

20-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

21-1 14001637

**Merle Lavin**

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
 Matt Thomas

**Organisation**  
 The Celtic Inn

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
 No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

**Please provide any comments below:**

There is no evidence to suggest that limiting on licensed premises to an earlier closing time will result in a decrease in pre-loading, which is the aim of the proposed LAP. The issue is the difference in price of alcohol available from off-licenses, and on-license. Until this disparity is addressed, it will remain a problem. All I can see forcing an early closure for on-licenses doing is increasing the rate at which pre-loaders drink, and also causing a spike in alcohol-related problems when all bars have to shut at 2am, and everyone is out on the streets at the same time. This puts extra pressure on police, medical staff, and those providing transport all at the same time. An earlier closure of off-licensed premises may help, by reducing the opportunity to 'side-load' (ie drinking while between bars, or in transport) - to that end I believe an earlier closure of 9pm may be effective.

21-2

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

I'm not sure a one way door policy would be helpful, as again, it leaves people on the streets without anywhere to go. If my licensed premise closes at 12, 1 or 2am, some patrons still want somewhere to go and be social.

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

Before making an enforced change to the closing times for all on-licenses, there needs to be hard evidence that it reduces the effect of preloading and binge drinking. I recognise that this is a problem, not just in Palmerston North, but in New Zealand generally, but this is not the solution. Until the disparity between alcohol prices at on and off-licenses is addressed, this will continue to be a problem.

Merle Lavin

22-1

13997639

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
John Faiz

**Organisation**  
Legacy Centre

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.  
I oppose this

**Please provide any comments below:**

I would like the council to restrict the number of alcohol licenses in our city. Alcohol is too available.

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.  
I support this

**Please provide any comments below:**

I support reducing the hours alcohol is sold. I would support restricting alcohol being sold from bottle stores and supermarkets to 7pm.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I oppose this

22-2

**Please provide any comments below:**

I would like to see no bottle stores in our low income communities. We have been hands on working with individuals and families in the Western Suburbs on Palmerston North for over 15 years now. Many of the sexual assaults, domestic violence incidents, thefts etc are alcohol related. I don't think it's good for us to have a bottle store in low income communities because we are making alcohol easily available to high risk people and helping create the wrong culture in our communities by having bottles stores so visible. Take the bottle store in Highbury. It's located in a block of shops next to the bakery and fish and chip store that our families frequent. Our kids walk past it on the way to school. Having a bottle store in a community that is attached to a pub (e.g., a bottle store off the Cloverlea Tavern) that is away from our kids is very different to having a bottle store next to our corner dairy. I think we need to be thinking about availability but also visibility and the way this shapes a culture in our communities.

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I don't know/no opinion

**Please provide any comments below:****Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

**Please provide any comments below:****Other comments****Do you have any other comments or suggestions to make?**

Over 15 years working in our lowest income community with individuals and families I have seen first hand the horrific damage excessive alcohol consumption is causing. I am in favour of stronger regulations.

23-1  
13998738

**Merle Lavin**

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
 Chris Brown

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
 No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

**Please provide any comments below:**

I think that the number of licences in operation per capita should be kept relatively constant. I.e. new licences could be provided if others had expired, or the city had grown.

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this

**Please provide any comments below:**

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

**Please provide any comments below:**

23-2

I believe that controls should be in place around the density of alcohol suppliers in a given geographic area. Obviously the CBD may be more dense, but it wouldn't be desirable to be overrun with bottle stores and pubs in outlying suburbs.

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?



13998636

24-1

**Merle Lavin****From:**

Submission

**Subject:**

FW: Draft local alcohol policy submission

**Your contact details****Full name**

Nathanael Shaw

**Hearings****Do you want to speak to the Council in support of your submission?**

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

**Please provide any comments below:**

We don't need more alcohol outlets

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this

**Please provide any comments below:****Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

**Please provide any comments below:**

We need to restrict alcohol outlets in residential areas

**One-way door restrictions**

24-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I don't know/no opinion

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

Merle Lavin

25-1

14002048

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Darryl Witton

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Reason given for this as per Facebook "We're proposing to change the maximum trading hours for licensed premises around the city. This will mean that most premises will close an hour earlier to discourage 'pre-loading'." - What idiot makes this stuff up?! PRE loading is done BEFORE. Oh and while you're at it, hey guys, lets ignore the fact domestic violence is as bad as ever and encourage people to drink at home! There's more cause to extend hours than reduce them. The problems we have is with crime and punishment, not alcohol. And just like guns, alcohol is the victim here. Funny thing is, I have gone out maybe once in the last 5 years.

#### Location

25-2

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

If you want to do something, get the reason right. Don't make up garbage and expect people to swallow it. There's a reason people have no faith in our "leaders" and this is a prime example why!

Merle Lavin

26-1

13999551

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Janaya Rutherford

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Changing closing times to an hour earlier will not change "pre-loading" as punters will only pre-load an hour earlier. Also, for those who dont pre-load and just enjoy a night out, by the time us lady's are ready to go to town it wont be long before it's shut which would be a total buzz kill.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

26-2

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

Merle Lavin

27-1

13999550

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

steve white

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

#### One-way door restrictions

27-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

##### Do you have any other comments or suggestions to make?

Your report and research is fine and appears to be a well thought out review however it doesn't actually do anything to help control and eradicate the issues that you have publicly stated. Palmerston North's night life has been terrible for the past few years. Councils and Police have worked to increase prices of alcohol and to stamp down on consumption of alcohol on premise. However they have largely ignored an increase of call outs to private homes and public areas. Having well trained bar and security staff and focusing on "host responsibility" at a national level would be a start. Host responsibility has been largely a joke in NZ compared to RSA policy in AU. Closing a bar early, when it is the small minority of establishments open past 2am is not the solution. A lock out system can work, however its hard to convince people that they can't come into a nightclub when the music is pumping. Having individuals that cause crime and harm actually have to pay reparations or medical bills or for damage to property would at least mean there was a consequence to becoming intoxicated and behaving in a negative fashion.



Merle Lavin

28-1

14002851

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Graeme Gillespie

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

The rules for on-licensed premises should be the same regardless of location. You should not use the Local Alcohol Policy to retrospectively address a planning issue. This also leaves the Council open to challenge due to its significant conflict of interest. A number of the city's excellent conference and function venues would be put at a material disadvantage from Council's own venue located within the business zone.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

28-2

However this could be seen as inconsistent with the restrictions placed on on-licenses in locations outside the business and industrial zones.

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

One-way door restrictions are an excellent mechanism for reducing late night migrations of drunks and excessive drinking.

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

Reduction in alcohol related harm will require a change in culture achieved through coordinated multiagency approaches. The evidence coming from the prohibition era demonstrates the ineffectiveness of supply side interventions - which actually cause an equal and opposite reaction counter to alcohol harm reduction outcomes.

Merle Lavin

29-1

1400 2047

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Stefan Charsley

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

The council should have policies in place for density of off-licenses issued within non-CBD areas.

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Restricting hours of on-licenses will not reduce harm caused by "pre-loading" and will cause further "pre-loading" and off premise drinking to occur where it can be more difficult to control and monitor.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

29-2

The council should impose strict rules around the location of new premises. Off-license alcohol has no reason to be sold outside of CBD and other major shopping areas.

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

Discretionary conditions should be an option for when special events and other non-regular trading activities occur.

#### Other comments

Do you have any other comments or suggestions to make?

If the council wants to truly tackle alcohol over-consumption issues then it must take a look at the pricing, especially in supermarkets where economic practices such as loss-leading occur. The research already completed over the years shows loss-leading to be a major factor in the quantity of alcohol purchased and consumed as it encourages a "pre-loading" culture where alcohol purchased at supermarkets is significantly cheaper than alcohol purchased at dedicated liquor stores and on-license premises.

Merle Lavin

30-1

13997450

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Jordan Lanfear

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I don't know/no opinion

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

I have just finished having a conversation with a few of my student mates. We all agree that this will most certainly make all of us teens preload more, earlier, and heavier. Club shutting down an hour earlier? Oh sh\*t better grab an extra box and start drinking an hour or 2 earlier. The majority of club users preload and there is no stopping that. It is simply cheaper then going to the club stone cold sober.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:

30-2

### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I don't know/no opinion

Please provide any comments below:

### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

### Other comments

Do you have any other comments or suggestions to make?

Merle Lavin

31-1

13996438

From:

Submission

Subject:

FW: Draft local alcohol policy submission

**Your contact details**

Full name

Bruce Thomson

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

Although alcohol, like tobacco, is used for recreation, community use of it is generally unhealthy. There are abundant alternative, healthier recreational options. Therefore it seems reasonable to educate the community of the harm, and stop giving official approval to it by granting licences. If half of the Manawatu road toll may be respectably regarded as caused by alcohol, then alcohol kills ten of us each year. See the news item at <https://www.stuff.co.nz/national/106816458/wider-manawat-on-track-for-worst-road-toll-in-five-years> At least a third of homicides seem avoidable if alcohol is not causing loss of judgment and control. See coroner statistics at <http://bit.ly/37flj8J> This suggests that of about eight murders, we can save at least two of the lives. A thousand violence incidents per year in Manawatu, and police are saying that alcohol is increasingly the reason for the loss of control causing it. See <http://bit.ly/32VNKoM>

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

The trading hours are better set at none at all, by removing licence to sell alcohol. This will improve community health, family peace, and household income for alternative

31-2

recreation, and for budgeting security. Families will be more peaceful and cooperative. Workplaces and productivity and incomes will be better.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

Council should make the entire city a zero-alcohol area, and require a permit for reasonable, small quantities needed for use as a cleaning fluid and solvent.

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

A closed door policy is better. Close down the premises that currently sell alcohol.

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

Once alcohol is restricted to pharmacies and solvent vendors under toxic substances regulations, the national health and safety regulations will probably suffice.

#### Other comments

Do you have any other comments or suggestions to make?

Let's be naturally happier & healthier & wealthier and safer, without pretending we need to dose ourselves with a toxic substance.



Merle Lavin

32-1

14002254

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Vicki Gifkins

#### Hearings

Do you want to speak to the Council in support of your submission?

No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this

Please provide any comments below:

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

#### One-way door restrictions

32-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

Merle Lavin

33-1

13996833

From:

Submission

Subject:

FW: Draft local alcohol policy submission

#### Your contact details

Full name

Chase Beals

#### Hearings

Do you want to speak to the Council in support of your submission?

Yes

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

#### One-way door restrictions

33-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

#### Other comments

**Do you have any other comments or suggestions to make?**

I have work on and off in hospo for 8 years as security dj and duty manager/server. These changes will not make a difference. All your doing is forcing people put of bars earlier and making them linger in the atreets at an earlier time. We do our job in the bar by reducing this we cannot control the street. Its the polices job theor presents should be morr in the street walling the bwat atoppong dights once they are out of the bar because thats were it happens. Jot in the venies. But out of them where security cant act. Police should be doing their job. Dont make our jobs harder... and cut my.hours of work making my life harder

Merle Lavin

34-1

14602955

**From:** Submission  
**Subject:** FW: Draft local alcohol policy submission

#### Your contact details

**Full name**  
Olivia Taylor

**Organisation**  
Foodstuffs North Island Limited

#### Hearings

**Do you want to speak to the Council in support of your submission?**  
No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

**Please provide any comments below:**

We support the Council's decision not to restrict the number of licences issued within the District.

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

**Please provide any comments below:**

Foodstuffs is the franchisor of the PAK'nSAVE, Gilmours, New World and Four Square brands. Foodstuffs takes many steps to ensure our stores are responsible retailers of alcohol. Foodstuffs believes that the maximum licensed hours for supermarket and grocery stores should be 7am-11pm, but recognises that its stores within the Palmerston North City territorial area do not currently operate past 10pm. We set out below for your reference the current licence and store trading hours (weekdays maximum) for our stores in your Region. - Four Square Ashhurst Village: 7am - 8pm - Four Square Awapuni: 7am - 8pm - Four Square Cloverlea: 7.30am - 9pm - Four Square Highbury: 6.45am -

34-2

8pm - Four Square Hokowhitu : 7am - 8pm - Four Square Super Seven: 7am- 9pm - New World Aokautere: 7.30am - 9pm - New World Melody's: 7am - 10pm - New World Pioneer: 7am - 10pm - PAK'nSAVE Palmerston North: 8am - 10pm - Gilmours Central: 8am - 8pm Morning Hours The draft LAP proposes that the maximum licensed hours for all off-licences will commence at 7am. We fully support this proposal as it covers all of our stores' existing morning hours and we are unaware of any research that shows that further restricting the morning hours for off-licences reduces alcohol-related harm. Evening hours The draft LAP proposes that the maximum trading hours for all off-licences will conclude at 10pm. Ideally, Foodstuffs would like to see the maximum trading hours for the Palmerston North City territorial area extended to 11pm. This is because maximum licensed hours are not the default licence hours that licensees can obtain as a right – the licence hours are set by the licence decision-maker after assessment of the licence application (or renewal application) in accordance with the Act. We do not believe there would be many off-licence holders who would have legitimate reasons for needing a liquor licence to 11pm, but we value the flexibility that allows legitimate and scrupulous off-licence holders to apply for such a licence if future growth in the Palmerston North City territorial area indicated that customers would benefit from this. In addition, we believe that there are many valid reasons for distinguishing supermarkets and grocery stores from other types of off-licences. We believe that the Council should consider the likelihood of harm being caused by the differing types of premises. Most sales of alcohol from our supermarkets and grocery stores occur when a customer is purchasing alcohol as part of a wider grocery shop. Our supermarkets and grocery stores can only sell beer and wine, they cannot sell RTDs or spirits, and they are also subject to the 'Single Area Condition' limiting the location of alcohol in the store to a particular defined area. Foodstuffs recognises that we currently do not have any stores in the Palmerston North City territorial area operating beyond 10pm. However, a number of our stores currently close at 10pm. As customers are queueing at checkouts around closing time, there is the potential for some customers to just miss the deadline to complete their purchases or for staff to inadvertently make a sale of alcohol after 10pm. It is also possible that from time to time stores may extend their hours during the holiday season for customer convenience. Therefore, the default maximum trading hours (7am to 11pm) allow flexibility for operators and avoid customer relationship concerns.

#### Location

**A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.**

I support this

**Please provide any comments below:**

We support the Council's recognition that there is no universally consistent evidence that connects off-licence density (of all types) to alcohol-related harm or any particular types of harm.

#### One-way door restrictions

**A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.**

I don't know/no opinion

34-3

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

We support the Council's recognition that discretionary conditions are discretionary, and that the District Licensing Committee is highly capable of identifying reasonable conditions to be imposed on an off-licence on a case by case basis.

#### Other comments

Do you have any other comments or suggestions to make?

General Foodstuffs comments: Who we are As a proudly 100% Kiwi owned and operated business, the Foodstuffs Co-operatives have grown from humble beginnings to become New Zealand's biggest grocery distributor, and one of the country's largest organisations. Stores are active members of their communities and as large employers continuously strive to give back by sponsoring and giving support to a wide range of charitable initiatives, sports teams and schools. Foodstuffs North Island Limited (Foodstuffs) is the franchisor of 44 PAK'nSAVE, 100 New World, 171 Four Square, and 7 Gilmours stores. Our stores are a major employer in the Palmerston North Region with eleven franchised stores. We may in the future open more stores in your Region. Steps undertaken by Foodstuffs to ensure our stores are responsible retailers of alcohol Foodstuffs works hard to ensure that it, and every one of its stores, is a responsible retailer of alcohol. As a business, we ensure our stores understand fully their obligations under the current legislation regarding the sale of liquor. Before a new employee can sell alcohol to customers, they must complete induction training which teaches the employee about their responsibilities under the Sale and Supply of Alcohol Act 2012 (Act). All employees must then undertake refresher courses which they must pass. There are voluntary online courses which store owners can recommend to their staff and, on occasion, Foodstuffs may require employees to complete this online course in addition to their mandatory training. After receiving training, staff are required to sign an acknowledgement stating that they understand their obligations under the Act. All duty managers and operation managers are required to carry out their Licence Controller Qualification and Foodstuffs requires that all stores have at least two people employed with their General Manager's Certificate, with supermarkets having a much larger number than this. Our point of sale systems prompt the verification of age when an alcohol product is scanned. All stores have an "Under 25: ID required" policy which requires anyone who looks under the age of 25 to provide proof of their age. Additionally, we have an independent programme in place where all of our stores are 'mystery shopped' to ensure proof of age compliance is being adhered to. There are heavy penalties for liquor audit fails (both internal and 'police stings'), which include fines, additional training programmes and referring repeat offenders to our Board of Directors which can result in a store owner's franchise agreement with Foodstuffs being terminated. Due to the seriousness of the consequences of a liquor audit failure, our store owners are vigilant in ensuring that the Act is adhered to, in particular the prohibitions on supply to minors and intoxicated persons.

35

14002959

**Merle Lavin**

---

**From:** Submission  
**Subject:** FW: Palmerston North Draft Local Alcohol Policy - consultation

**From:** Joolz <  
**Sent:** Wednesday, 30 October 2019 2:11 PM  
**To:** Peter Ridge <[peter.ridge@pncc.govt.nz](mailto:peter.ridge@pncc.govt.nz)>  
**Subject:** Re: Palmerston North Draft Local Alcohol Policy - consultation

Hi Peter, can you please register my submission regarding the (Draft) LAP.  
 I fail to see the connection between preloading and reducing the trading hours.  
 Thanks very much.  
 Joolz  
 Julian Clark  
 George Hospitality Group

Sent from my iPhone

On 25/10/2019, at 3:46 PM, Peter Ridge <[peter.ridge@pncc.govt.nz](mailto:peter.ridge@pncc.govt.nz)> wrote:

The Palmerston North City Council is consulting on the draft Local Alcohol Policy, and we want to give you the opportunity to have your say.

The draft Local Alcohol Policy is a new policy that gives Council the power to set local rules for the sale of alcohol in Palmerston North. The draft policy includes three objectives:

- to minimise the harm caused by excessive or inappropriate consumption of alcohol
- to provide clear and transparent guidance for licensing decisions;
- to reflect the views of the community with regard to the sale and supply of alcohol.

To that end, the draft Local Alcohol Policy is proposing to reduce the maximum trading hours for licensed premises:

- For on-licensed premises such as bars, restaurants and cafes in the business and industrial zones, this would be 8am to 2am the next day (currently 3am). For on-licensed premises in all other zones, this would be 8am to 12am the next day.
- For off-licensed premises such as bottle stores, grocery stores and supermarkets this would be 7am to 10pm (currently 11pm)
- For clubs it would be 8am to 12am the next day (currently 3am).

Full details of these proposals, along with the reasons for them, are contained in the Statement of Proposal document, available to download from our website [www.pncc.govt.nz/alcoholpolicy](http://www.pncc.govt.nz/alcoholpolicy). Also available to download is the research report which informed the development of the policy. You can also pick up a copy of the Statement of Proposal at the Council's Customer Service Centre or from the Council's public libraries.

I would strongly encourage you to make a submission on the draft Local Alcohol Policy. Once Council has made its final decision, following consultation, there will be a period for people to appeal the final decision. However, only those people who made a submission on the policy during our consultation process will have the right to appeal our final decision. Regardless of whether you support or oppose what Council has proposed, I strongly encourage you to make a submission so you have the ability to appeal if you want to.



36-1

14025465



## Submission Form

### Draft Local Alcohol Policy 2020

PAGE 1 OF 2

#### Your contact details

Full Name: Linda Kay DorroughOrganisation (if applicable): ucwa

Postal Address: \_\_\_\_\_

Phone (day): \_\_\_\_\_

Email: \_\_\_\_\_

Please note, as required by legislation, your submission (including contact details provided on the submission form), will be available to the public and media and on the Council website as part of the decision-making process unless you request that these details be kept private. If you wish to keep your contact details confidential, please tick this box. ☒

Submissions hearings are planned for February or March 2020.

Do you want to speak to the Council in support of your submission? (please tick) ☐ Yes ☒ No

#### Making your submission

You can find details about the draft Local Alcohol Policy, along with the reasons for making those proposals, in the Statement of Proposal. We have also prepared a research report which informs our proposals, and may be useful for you in making your submission. Both of these documents can be found on our website [pncc.govt.nz/alcoholpolicy](http://pncc.govt.nz/alcoholpolicy).

#### Appeals

We strongly encourage anyone with an interest in this draft policy to make a submission to secure the right of appeal. At the end of the consultation process, there will be an opportunity to appeal the Council's final decision. However, this right of appeal is only available to those people who make a formal submission on the draft policy (i.e. this process).

#### Issuing further licences

A Local Alcohol Policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. **The Council is not proposing to include restrictions on whether to issue further licences.**

☒ I support this ☐ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

---

---

---

---

---

---

---

---

---

---

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

| Local Alcohol Policy 2020 23

36-2

**Trading hours**

The Local Alcohol Policy can set maximum trading hours that are different from the national maximum trading hours.

**The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.**

☒ I support this    ☐ I oppose this    ☐ I don't know/no opinion

Please provide any comments below:

Because of the large number of students  
who are unsupervised for the first time  
it would be good to have some legal restrictions

**Location**

A Local Alcohol Policy can include restrictions on where new licensed premises can be located.

**The Council is not proposing to include any location restrictions in the draft Local Alcohol Policy.**

☐ I support this    ☐ I oppose this    ☒ I don't know/no opinion

Please provide any comments below:

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

36-3



## Submission Form

### Draft Local Alcohol Policy 2020

PAGE 2 OF 2

#### One-way door restrictions

A Local Alcohol Policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time.

**The Council is not proposing to include a mandatory one-way door restriction.**

☐ I support this ☒ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

Would be good if last admissions could be  
at a certain time ie 1am

#### Discretionary conditions

The Local Alcohol Policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted.

**The Council has not included any discretionary conditions in the draft Local Policy.**

☒ I support this ☐ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

| Local Alcohol Policy 2020 25

37-1

14025967



## Submission Form

### Draft Local Alcohol Policy 2020

PAGE 1 OF 2

#### Your contact details

Full Name: Tegan Lucy Harvey

Organisation (if applicable): \_\_\_\_\_

Postal Address: \_\_\_\_\_

Phone (day): \_\_\_\_\_

Email: \_\_\_\_\_

Please note, as required by legislation, your submission (including contact details provided on the submission form), will be available to the public and media and on the Council website as part of the decision-making process unless you request that these details be kept private. If you wish to keep your contact details confidential, please tick this box. ☐

Submissions hearings are planned for February or March 2020.

Do you want to speak to the Council in support of your submission? (please tick) ☐ Yes ☒ No

#### Making your submission

You can find details about the draft Local Alcohol Policy, along with the reasons for making those proposals, in the Statement of Proposal. We have also prepared a research report which informs our proposals, and may be useful for you in making your submission. Both of these documents can be found on our website [pncc.govt.nz/alcoholpolicy](http://pncc.govt.nz/alcoholpolicy).

#### Appeals

We strongly encourage anyone with an interest in this draft policy to make a submission to secure the right of appeal. At the end of the consultation process, there will be an opportunity to appeal the Council's final decision. However, this right of appeal is only available to those people who make a formal submission on the draft policy (i.e. this process).

#### Issuing further licences

A Local Alcohol Policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. **The Council is not proposing to include restrictions on whether to issue further licences.**

☐ I support this ☐ I oppose this ☒ I don't know/no opinion

Please provide any comments below:

---

---

---

---

---

---

---

---

---

---

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

37-2

**Trading hours**

The Local Alcohol Policy can set maximum trading hours that are different from the national maximum trading hours.

The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

☒ I support this    ☐ I oppose this    ☐ I don't know/no opinion

Please provide any comments below:

I feel as though this should be enforced as most of the time the bars etc have minors getting out of control for the last hour as too intoxicated

**Location**

A Local Alcohol Policy can include restrictions on where new licensed premises can be located.

The Council is not proposing to include any location restrictions in the draft Local Alcohol Policy.

☐ I support this    ☐ I oppose this    ☒ I don't know/no opinion

Please provide any comments below:

---

---

---

---

---

---

---

---

---

---

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

37-3



## Submission Form

### Draft Local Alcohol Policy 2020

PAGE 2 OF 2

#### One-way door restrictions

A Local Alcohol Policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time.

**The Council is not proposing to include a mandatory one-way door restriction.**

☒ I support this    ☐ I oppose this    ☐ I don't know/no opinion

Please provide any comments below:

---

---

---

---

---

---

---

---

---

---

#### Discretionary conditions

The Local Alcohol Policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted.

**The Council has not included any discretionary conditions in the draft Local Policy.**

☐ I support this    ☐ I oppose this    ☒ I don't know/no opinion

Please provide any comments below:

---

---

---

---

---

---

---

---

---

---

88

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

38-1

14027065



## Submission Form

### Draft Local Alcohol Policy 2020

PAGE 1 OF 2

#### Your contact details

Full Name: Rakesha Harvey  
 Organisation (if applicable): Mr. Jomypys Takeaways  
 Postal Address: \_\_\_\_\_  
 Phone (day): \_\_\_\_\_  
 Email: \_\_\_\_\_

Please note, as required by legislation, your submission (including contact details provided on the submission form), will be available to the public and media and on the Council website as part of the decision-making process unless you request that these details be kept private. If you wish to keep your contact details confidential, please tick this box. ☐

Submissions hearings are planned for February or March 2020.

Do you want to speak to the Council in support of your submission? (please tick) ☐ Yes ☒ No

#### Making your submission

You can find details about the draft Local Alcohol Policy, along with the reasons for making those proposals, in the Statement of Proposal. We have also prepared a research report which informs our proposals, and may be useful for you in making your submission. Both of these documents can be found on our website [pncc.govt.nz/alcoholpolicy](http://pncc.govt.nz/alcoholpolicy).

#### Appeals

We strongly encourage anyone with an interest in this draft policy to make a submission to secure the right of appeal. At the end of the consultation process, there will be an opportunity to appeal the Council's final decision. However, this right of appeal is only available to those people who make a formal submission on the draft policy (i.e. this process).

#### Issuing further licences

A Local Alcohol Policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. **The Council is not proposing to include restrictions on whether to issue further licences.**

☒ I support this ☐ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

I think local Alcohol policys should include restrictions on getting further licencing

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

| Local Alcohol Policy 2020 23

38-2

**Trading hours**

The Local Alcohol Policy can set maximum trading hours that are different from the national maximum trading hours.

The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

☒ I support this    ☐ I oppose this    ☐ I don't know/no opinion

Please provide any comments below:

I think this will give less time  
for young people to binge drink before  
they get to parties to try to  
"catch up" to their friends.

**Location**

A Local Alcohol Policy can include restrictions on where new licensed premises can be located.

The Council is not proposing to include any location restrictions in the draft Local Alcohol Policy.

☐ I support this    ☐ I oppose this    ☒ I don't know/no opinion

Please provide any comments below:

~~I think that there should be~~  
I think that there should be  
location restrictions in certain areas  
to ensure the safe consumption of  
alcohol.

SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019





## Submission Form

### Draft Local Alcohol Policy 2020

PAGE 2 OF 2

#### One-way door restrictions

A Local Alcohol Policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time.

**The Council is not proposing to include a mandatory one-way door restriction.**

☒ I support this    ☐ I oppose this    ☐ I don't know/no opinion

Please provide any comments below:

That's a good idea so as gives owners & workers an easier job. And young drinkers will go home earlier & it may mean less fights/unwanted incidents in the premises.

#### Discretionary conditions

The Local Alcohol Policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted.

**The Council has not included any discretionary conditions in the draft Local Policy.**

☒ I support this    ☐ I oppose this    ☐ I don't know/no opinion

Please provide any comments below:

I think this is valid!

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

39-1

14021846

## Submission on the draft local alcohol policy

### Contact details

Full name \*

Dr Audrey Jarvis

Organisation

**'Let the Children Live' group of Wesley Broadway  
Methodist Church, Palmerston North.**

Postal address \*

Phone \* (day)

Email \*

If you wish to keep your contact details confidential, please tick this box. Please note, as required by legislation, your submission (including contact details provided on the submission form) will be available to the public and media as part of the decision-making process, unless you request that these details be kept private.



### Hearings

Do you want to speak to the Council in support of your submission? \* Submissions hearings are planned for February or March 2020.



Yes



No

### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued. \*



We support this

Please provide any comments below:

***Re further licences:** This is acceptable as long as licences continue to require approval in accordance with the District Plan, so that Local Alcohol Policy cannot authorise something that the District Plan forbids. It is important for the District Plan to continue to seek public consultation for new licences, so that appropriate noise standards are in place and sufficient regard is given to the location relative to educational, worship and other community activities.*

### Trading hours

39-2

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day. \*

☞ We support this

Please provide any comments below:

*We, the 'Let the Children Live' group support the proposed objectives of the draft Local Alcohol Policy to reduce the maximum trading hours for licensed premises, as our purpose is to speak out and where possible to take action on issues which affect the lives of children and families. Reducing of trading hours is in accordance with our belief that moderate to heavy consumption of alcohol increases the chances of abuse and harm to families.*

**Expression of times:** *To permit clear and transparent guidance in the proposals, we suggest that the times '12 noon' or '12 midnight' be used as in the research document, in place of the ambiguous 12 am or 12 pm. Alternatively, the 24-hour could be used.*

**Alcohol-related offences:** *We are greatly concerned by the harm caused to families and individuals by accidents related to the intake of excess alcohol. We recognise that there is also significant harm from the use of illicit drugs, but this is not the subject of these regulations. It appears that the tragic vehicle accidents, caused often by young drivers under the influence of alcohol, frequently occur in the early hours of the morning. It is well recognized that the poor decision-making of a speeding driver, perhaps fleeing the police, is often exacerbated by alcohol (see Fig. 41. P.40 Research Report). This supports the proposal for earlier closing of premises selling alcohol.*

**Pre-loading problems:** *In the research report, it is noted that the trend for public assaults was said to have decreased, but that there is more pre-loading of alcohol and increasing domestic violence. The reduction proposed for maximum trading hours for on-license premises, through restricting hours, would reduce the abuse of alcohol in public places. The reduction in trading hours proposed for off-license premises such as supermarkets by having a cut-off at 10 pm would reduce pre-loading of alcohol.*

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions. \*

☞ We support this

Please provide any comments below:

**Re location:** *We recognise that while the Local Alcohol Policy is able to restrict trading hours, it will not be able to propose anything that is forbidden by the District Plan. The summary of the Local Alcohol Policy clearly states that under the four categories, on-licences, off-licences, club licences and special licences, any*

39-3

*categories, on-licences, off-licences, club licences and special licences, any applications for a licence for trading alcohol must comply with the Palmerston North District Plan requirements on the location of activities involving the sale of alcohol.*

**One-way door restrictions:** A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction. \*

☞ We support this

Please provide any comments below:

***Re one-way door restrictions:** The findings in the research report indicate that this would not have a significant effect on the abuse of alcohol. However, it would mean that patrons who have been drinking to excess and are evicted from the premises, cannot re-enter. It is most effective where several outlets are close together, and patrons might easily go from one to another.*

*It was noted that a voluntary one-way restriction has operated in Palmerston North amongst a network of bars within the inner CBD. This suggests it is not necessary to provide a regulatory approach, although it may be desirable for the timing to be standardised. In addition, the District Licensing Committee retains the discretion to impose this restriction on a licence application if it deems it appropriate.*

#### **Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy. \*

☞ We support this

Please provide any comments below:

***Discretionary conditions:** These if imposed can only be seen as advice to the District Licensing Committee. That these are omitted from the policy does not prevent the committee from imposing any such condition.*

#### **Other comments**

Do you have any other comments or suggestions to make?

*We take the opportunity of commenting on advertising regarding the responsible sale, supply and consumption of alcohol. We recommend that advertising be aimed more at parents/adults rather than young people. Responsible adult behaviour is a great teacher. The parent who says 'No thanks. I'm driving' is a better example than a TV advert.*

Merle Lavin

40-1

14022830

From:

Submission

Subject:

FW: Draft Local Alcohol Policy 2017 Submission

Jazz Rawiri

13th December 2019

My submission regarding the draft local alcohol policy.

I have been in hospitality for the last 26 years in Taranaki and Manawatu. I have worked mainly in the entertainment sector however I have also done extensive management, bar, marketing and promotional work in the industry.

I have seen the changes in drinking habits first hand in our local market and have also watched the demise of the industry as a whole over the years. It's becoming increasingly difficult to maintain a successful on license establishment with all the new policies, bylaws and acts you must abide by. Pubs are supposed to be a place of social interaction and preserving the overall experience of this social behavior is what I believe is being threatened with the proposed draft alcohol policy.

Looking at the objectives that are hoped to be achieved I would like to isolate each objective and comment accordingly

1. Minimizing the harm caused by excessive and inappropriate consumption of alcohol.

Its clear to me that minimize is not a word this council or local liquor licensing seems to understand with the allowance of more off license applications being approved since the city engaged in a trial in 2017 where license holders voluntarily closed early to see if such a move would help towards this objective. More off license premises has to do the exact opposite in fact with promoting more unsupervised drinking outside of bars where consumption must be monitored. I ask who is responsible for people who purchase from an off license premise once they walk out the door? The responsibilities are a whole lot less for these establishments or in a word are minimized.

40-2

It is sad that local pubs and bars are being targeted in this policy as they offer the safest environment to consume alcohol.

In Dunedin earlier this year there were fatalities at a student party the spiraled out of control. This is clear evidence that liquor is too easy to access and consume in an unsafe environment.

Bar operators take on the expense of security and uphold host responsibility policies to ensure a safe drinking experience for all customers.

I believe the solution is to raise the taxes on alcohol for the public only when purchased from an off license premises and also limiting the amount of off license locations. As it stands it is easier to find a liquor store than an ATM in Palmerston North.

Pubs would still purchase alcohol at a wholesale rate to maintain the margins needed to run accordingly.

I suggest following what has been done in Australia where the bottle stores are not as attractive price wise as they are currently which could then force people back to the bars where the drinking environment is controlled.

More focus needs to be shifted onto off license operations and their responsibilities and maybe their responsibilities need amendments at a national level.

In 2017 the Albert Sports Bar was the only venue that did not take part in the 2am voluntary close that was trialed across the city. We introduced a one way door policy during this time to stop anyone coming from the CBD entering after 2am however it became apparent that many people continued to hang around in the CBD as they normally would with a 3am close. Our turnover for this period remained the same as did patronage to the bar. I would like to know what the council's findings were after this pointless exercise and wonder if this did indeed stem the consumption and inappropriate consumption of alcohol. Was there a change in the number of police related incidents surrounding alcohol over this period? And if there were changes can they be linked to on license trading hours or the off license sales of liquor.

Suburban pubs such as the Albert Sports Bar have a unique clientele that chose to go there rather than the CBD bars. It offers a mature respectful atmosphere and attracts a wide cross section of people where demographic and socio economic standings are put aside. Other cities use to have this same dynamic with their suburban pubs however over

40-3

time these sites have been re developed and shut down.. We are extremely lucky in Palmerston North that we still have a thriving suburban market and taverns to accommodate.

I strongly oppose the proposed 12 midnight closure for on license premises outside of industrial zones. This would force or detour what is normally a controlled customer base to explore other choices. The Albert offers entertainment until 3am however if a midnight close is introduced the time limitation will end this activity. It may also lead to more home drinking rather than going into the CBD. To date the 3am closure of bars in Palmerston North have not been an issue for most venues. There have been noise issues for the Princess Tavern and Cloverlea Tavern that ultimately impacted on those venues trading hours and conditions. This would be the case for any bar that violated the district plan, bylaws, sale of liquor act etc.

It is my belief that geography should not be a factor to dictate a bar owners opportunity to trade. If it is going to be midnight close then all bars should close at midnight.

However this should only be implicated if there is clear evidence that trading until 3am is the primary cause of objective 1 in this policy.

## 2 To provide transparent licensing decisions

I believe that although transparency is easy to provide the details of the decisions made may not be.

Some parts could be contrary to part of the policy. I will use the workshop bar as an example in this case as they are situated in an industrial zone so therefore could be exempt from the proposed changes

Location of on license premises should not be an issue regarding there hours of trade as allot of these sites have existed for over 40 years. If all requirements have been met and maintained and no council conditions are imposed on the premises there should be no problem in continued trade as their license states.

Off license applications seem to be granted with no thought and total disregard to the communities they service. Access to alcohol has been made easy due to the amount of outlets in Palmerston North. These outlets promote uncontrolled consumption of alcohol and limiting trade to 10pm will do little to change these habits

40-4

It is obvious the granting of an off license is far less stringent than an on license and the application process is done in a manor that may be out dated or not transparent at all. To see more such license issued since 2017 is a complete lapse of judgment knowing this current proposed policy is yet to be drafted. It displays that there must not be that much of a problem after all otherwise more care in that decision process would have been taken.

Like individuals any current on license and future applicants should have allowances of trade and activity based on a case by case bases. Taking into account all aspects that may impact the area along with all the benefits. In respect to the Albert the pub has proven to be a community asset promoting local clubs and it's rich history of providing top class entertainment. It currently caters to a vibrant market and provides fulltime employment to many people who depend on those late hours of trade. We have a focus of high level host responsibility. Promoting a safe environment is paramount so we have a reputable security company employed along side a team that is dedicated to ensure a positive experience is had by all." We also offer a courtesy coach to and from the venue to delete drink driving as a potential risk. We have a noise management plan in place to ensure the rights of our neighbor's peace is not compromised. We strive to do the best we can to serve our community.

### 3. To reflect the views of the community with regard to the sale and supply of liquor

I do not think enough has been done to make the wider community aware of these current proposals. The majority of the drinking public in Palmerston North would not know this was before council and could ruin the night life in the city. I guarantee if a council lead petition across all bars asking patrons if the bars should shut early were to be put out them it would be unanimous that it's a stupid idea. Not because they are all of a younger demographic but because they enjoy to socialize at bars with great entertainment in a safe and comfortable environment. I know first hand after the 2017 trial that none of the drinking public knew why the voluntary closures were in place.

I ask myself why a small collective of people who do not agree with the current trading times of bars believe cutting back hours is the answer and I come to the conclusion that they do not fit the current make up of people who indulge in Palmys night life.



40-5

Palmerston North is a vibrant city with an on going student base and its range of diverse drinking establishments needs to be preserved for the greater good of the community and the future of its hospitality industry. What better place to have the drinking public than in a bar of pub and the longer these places can monitor alcohol intake the better. Its plain common sense.

I would like to share my view on the proposed trading hours of 8am and why these hours are not the ones that are taken away. The only benefit of trading at 8am is to attract the gambling sector so I'll ask is there a problem with gambling that should be looked at before the alcohol policy is drafted.

A lot of bars depend on this revenue however I do not think local council do enough to ensure these venues are not primary gambling venues rather than bars.

I thank you for the time you have taken to read my submission and look forward to the discussion and development of this draft policy.

Naku Noa

Jazz Rawiri  
Albert Sports Bar, Royal Hotel

Merle Lavin

41-1

14023950

From:

Submission

Subject:

FW: Draft local alcohol policy submission

**Your contact details**

Full name

Matthew Johnstone

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I don't know/no opinion

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

**One-way door restrictions**

41-2

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I don't know/no opinion

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

Merle Lavin

42-1

14028372

From:

Submission

Subject:

FW: Draft local alcohol policy submission

**Your contact details**

Full name

Ricky Quirk

Organisation

George Hospitality Group

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

3am Closing to remain as is currently

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

42-2

I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

**Do you have any other comments or suggestions to make?**

After a failed trial period in 2017 of the CBD bars closing at 2am we experienced more trouble than the current closing time of 3am because of the large numbers being forced on to the streets at 2am which currently the numbers naturally faze out over the last hour of trade ,making the streets a lot safer and a lot less violence and disorder. The theory that people will come into town earlier and go to licensed premises instead of pre loading had no effect in the trial period.

Merle Lavin

43-1

14023251

From:

Submission

Subject:

FW: Draft local alcohol policy submission

**Your contact details**

Full name

Ian McQueen

Organisation

BAS(PN)Ltd T/A Brewers Apprentice

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

Although the change does not effect Brewers Apprentice directly as we are only licenced to 2 am ,when the trail in 2017 of 2 am closing, it did effect us because patrons stopped coming to us for drinks etc (the effect being profitability dropped and we had to reduce staff numbers) before going on to the 3 am closing bars they instead went straight there knowing were closing at 2am . Once it returned to 3 am we got theses patrons back and we become more profitable and employed more staff again. There was also more trouble in town because all bars closing at the same time. If closing times are reduced it will effect the vibrancy of the city also profitability of bars and employment. This has being proven all around the world and Sydney for example has just reverted back to the old later trading hours as it had a impact on the city of 16 Billion dollars annually.

43-2

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

I have a lot to say as I am the longest service publican in the CBD (well over 30 years) but will leave this to I am heard.

Merle Lavin

44-1

14028373

From: Submission  
 Subject: FW: Draft local alcohol policy submission

#### Your contact details

Full name  
 Aleisha Deane-Hayward

Organisation  
 Brewers parrentice

#### Hearings

Do you want to speak to the Council in support of your submission?  
 No

#### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

#### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

As a person that works night shift i would like to have the opportunity to go out and have a drink after we close at 2am,also I could potentially lose work hours which means i will loss my source of income

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this



44-2

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

45-1

14023153



10 November 2019

Alcohol Licensing Team  
Palmerston North City Council  
Private Bag 11034  
Manawātū Mail Centre  
**PALMERSTON NORTH 4442**

Email: [submission@pncc.govt.nz](mailto:submission@pncc.govt.nz)

#### **SUBMISSION ON PALMERSTON NORTH DRAFT LOCAL ALCOHOL POLICY**

##### **Summary**

1. General Distributors Limited ("GDL") welcomes the opportunity to submit on the Draft Palmerston North Local Alcohol Policy ("Draft LAP"). As an off-licence holder within the Palmerston North District, GDL has an interest in the matters raised in the Draft LAP.
2. GDL supports the intent of the Draft LAP and considers that it should be adopted as notified.

##### **Who we are**

3. GDL operates over 180 Countdown supermarkets across New Zealand, and holds over 150 off-licences. It is also the franchisor of the SuperValue and FreshChoice brands in New Zealand, for which local franchisees hold off-licences.
4. As an off-licence holder, GDL is committed to being a responsible retailer of alcohol, and supports the object of the Sale and Supply of Alcohol Act 2012 ("Act"). GDL acknowledges that it has a shared responsibility to prevent alcohol related harm and aims to be an industry leader in the responsible sale of alcohol.
5. In the Palmerston North district, GDL holds four off-licences for the following supermarkets:
  - (a) Countdown Broadway, which has licensed hours of 7 am to 11 pm.
  - (b) Countdown Rangitikei Street, which has licensed hours of 7 am to 11 pm.
  - (c) Countdown Palmerston North, which has licensed hours of 7 am to 11 pm.
  - (d) Countdown Kelvin Grove, which has licensed hours of 7 am to 10 pm.

##### **Off-licence hours**

6. Under section 77 of the Act, the content of an LAP is restricted to the listed matters which includes maximum trading hours (section 77(1)(c)).
7. The Draft LAP proposes to restrict the hours of off-licences to 7am to 10pm on Monday to Sunday across the entire Palmerston North District.

45-2

8. Two of GDL's stores, Countdown Kelvin Grove and Countdown Palmerston North, already adhere to these trading hours (ie 7 am to 10 pm) despite their licence conditions. However, the proposed restricted trading hours means that two of GDL's stores in the district (Countdown Broadway and Countdown Rangitikei Street) will lose one hour of trading.
9. While GDL supports the Act's national default off-licence hours (ie 7 am to 11 pm), GDL does not oppose the Draft LAP's proposed maximum trading hours for Palmerston North.

**Other matters under section 77**

10. In its consultation documents, the Council sets out the research it undertook in considering policies in its Draft LAP on:<sup>1</sup>
  - (a) the location of licensed premises;
  - (b) whether further licences (or licences of a particular kind or kinds) should be issued for premises in the district concerned, or any stated part of the district; and
  - (c) the issue of licences, or licences of a particular kind or kinds, subject to discretionary conditions.
11. The Council considers that there is no evidential basis to support restrictive policies on these matters, stating that:<sup>2</sup>
  - (a) for off-licences, there is no particular evidence that suggests that bottle stores in high deprivation areas are more likely to cause alcohol related harm than bottle stores in any other deprivation area;
  - (b) the District Plan already restricts the location of commercial activity in certain zones; and
  - (c) discretionary conditions are not mandatory, so the identification of such conditions within the LAP would only serve as advice to the District Licensing Committee when assessing an off-licence on a case-by-case basis.
12. GDL agrees that there is insufficient evidence to support the imposition of any restrictive policies on these matters in the Palmerston North District at present and therefore supports the proposal in the Draft LAP to not control the location, number or conditions of off-licences.

**Conclusion**

13. GDL accepts the Draft LAP as notified. GDL does not support any changes to the Draft LAP. GDL wishes to be heard on its submission.

Yours faithfully

PP   
 Paul Radich  
 National Alcohol Responsibility Manager  
 Woolworths New Zealand

<sup>1</sup> Palmerston North City Council, Local Alcohol Policy 2020 Research Report.

<sup>2</sup> Palmerston North City Council, Draft Local Alcohol Policy 2020 Statement of Proposal August 2019 at p 18.

46-1

14035977

Hospitality New Zealand Palmerston North Branch  
representing Palmerston North City



TO PALMERSTON NORTH CITY COUNCIL  
SUBMISSION ON THE DRAFT LOCAL ALCOHOL POLICY 2020  
DECEMBER 2019

**CONTACT DETAILS:** Hospitality New Zealand  
**Contact:** Adam Parker  
**Phone:** 027 550 2558  
**Email:** adam@hospitality.org.nz  
[www.hospitality.org.nz](http://www.hospitality.org.nz)

46-2

## About Hospitality New Zealand

Hospitality New Zealand is a member-led, not-for-profit organisation representing approximately 3,000 businesses throughout New Zealand, including Taverns, Pubs, Bars, Restaurants, Cafes, Retail Liquor and Commercial Accommodation providers such as Camping Grounds, Lodges, Motels, Hotels and Backpackers.

We have a team of 8 locally based Regional Managers across the country, with a National Head Office based in Wellington. We have our own lawyer, who specialises in employment and alcohol licensing matters as well as being able to advise on the entire range of hospitality-related statutes and legislation. Our team is available 24/7 for members to obtain assistance, advice and guidance on a range of topics, questions and queries as they arise, and we have over 130 written resources available to members.

As well as our own resources, Hospitality New Zealand also work closely with Police, Local Government and the Health Promotion Agency to educate and ensure correct legal guidance for our members through the production of additional resources and interactive workshops.

Hospitality New Zealand also offer training and up-skilling courses to our members and their staff. Some of these modules include but are not limited to: 'LCQ training' and 'becoming a responsible host'. In addition, Hospitality New Zealand have recently implemented a service for completing alcohol license applications on behalf of our members. Although this is a new offering as part of the membership, we anticipate that this will reduce error and workload for not only our members, but also the licensing officials at Palmerston North City Council.

Based on the aforementioned information, Hospitality New Zealand considers themselves as part of the solution to preventing alcohol related harm by helping our members provide a safe and regulated environment for the consumption of alcohol.

Hospitality New Zealand has a 115-year history of advocating on behalf of the hospitality and tourism sector and is led by Chief Executive, Julie White. The Palmerston North Hospitality New Zealand branch president is Colleen Maxwell of the Masonic Hotel, and the Regional Manager for the Branch is Adam Parker.

The Palmerston North Branch of Hospitality New Zealand represents Palmerston North City, which is made up of 78 members.

We wish to make an oral submission should the opportunity arise

We appreciate the opportunity to make a submission on the Draft Local Alcohol Policy.

46-3

## DRAFT PALMERSTON NORTH CITY LOCAL ALCOHOL POLICY (LAP)

## Introduction and Overall Comments

1. The Hospitality industry is not only a significant employer in New Zealand, but it is the cornerstone of our culture and plays a vital role in our social life.
2. The production and sale of alcohol is a significant driver of economic activity, with more than 133,000 people working Nationwide in the food and beverage sector (Stats NZ, 2019). The food and beverage sector in particular, is now the fifth largest area of financial spend for both international and domestic tourism, behind accommodation services, air transport and recreational activities.
3. In the last decade, the prevalence of alcohol consumption across New Zealand appears to be relatively stable at around 80% of the population. (Ministry of Health, 2019). However, alcohol related harm also appears to have decreased in New Zealand when compared with the same data from 2007/08. Furthermore, the same data reported individuals drinking less frequently to intoxication and being more aware of moderating behaviours through food consumption and low alcohol beverages.
4. The consumption of alcohol also appears to have decreased within on-premise establishments as opposed to off-premise establishments. A 2018 report from the Health Promotion Agency estimated that on-premises establishments now account for around 14% of all alcohol sales in New Zealand, with 84% relating to off-premise sales. Supermarket and grocery store sales now account for the largest share of sales by total beverage volume (HPA 2018).
5. Hospitality New Zealand is concerned that the draft Local Alcohol Policy will be detrimental to businesses in Palmerston North without making any real contribution to alcohol related harm, and will potentially cause unintended consequences.
6. The draft Local Alcohol Policy fails to recognise the role that on-licensed premises play in the reduction of alcohol related harm. In addition, by limiting the availability of supervised venues, we feel that this will not achieve a harm minimisation outcome. On-premise operators in Palmerston North are highly regulated; running controlled environments and are regularly supported by Hospitality New Zealand. They are trained and prepared to deal with issues of intoxication and any potential underage drinkers. Host Responsibility requirements are stringent and heavily monitored by the regulatory agencies such as; Police, Local Government, and Medical Officer of Health. Furthermore, Hospitality New Zealand regularly deliver Host Responsibility sessions with the staff of our members.

46-4

7. Hospitality New Zealand are concerned that there is a lack of up to date empirical data that relates directly to Palmerston North, in order to support the restrictions recommended. There is a disproportionate focus towards restricting on-licenses and a failure in the draft Local Alcohol Policy to address the real issues, such as pre-loading and the consumption of alcohol in uncontrolled environments where there is currently no focus on restrictions.

### Research for the Draft Local Alcohol Policy

8. Hospitality New Zealand recognise the effort and the time that council have put in to producing the Draft Local Alcohol Policy. We also recognise that this process was not rushed, and that some research has gone into this process. However, Hospitality New Zealand would like to address some points as part of the proposed Draft LAP, for council to consider the potential long-term effects of the proposal.

### The Potential Long-Term Impact on Small Business

9. Hospitality New Zealand recently engaged with staff at the Central Economic Development Agency (CEDA), for some statistics around the potential loss off annual conferences and large events if trading hour were to be decreased.
10. CEDA kindly pointed us towards a recent survey entitled "Business Events Activity Survey", which was carried out by the Ministry of Business, Innovation and Employment (MBIE). The survey (*completed in June 2019*) was aimed at venues in the Manawatu region that regularly host MICE (meetings, incentives, conferences and exhibitions). Participants include major hotel chains, convention and exhibition centres and boutique venue providers.



46-5

11.

(a)

Table 1: Overview of all business events (year ended June 2019)

Region	Single day Events	Multi-day Events	Total Events	Delegates (all events)	Delegate days		
					Count	Market share	Change in market share from 2018 Q2
Auckland	10,222	2,893	13,199	1,198,518	1,611,263	35%	-2%
Hamilton & Waikato	3,988	747	4,737	279,057	346,233	7%	-1%
Bay of Plenty	1,603	366	1,972	140,840	181,707	4%	No change
Rotorua	1,703	513	2,219	137,276	207,465	4%	No change
Taupo	753	342	1,096	47,017	73,668	2%	No change
Hawkes Bay	1,208	220	1,429	77,397	106,500	2%	No change
Manawatu	2,345	425	2,771	190,051	230,110	5%	No change
Wellington	5,381	1,618	7,052	709,720	963,858	21%	1%
Marlborough	1,129	292	1,437	74,556	104,393	2%	No change
Nelson	1,732	305	2,043	107,108	137,108	3%	No change
Christchurch & Canterbury	4,970	912	5,888	352,455	426,980	9%	1%
Dunedin	1,137	253	1,388	100,557	130,500	3%	No change
Queenstown	1,130	491	1,619	75,041	120,403	3%	No change
Total	37,306	9,385	46,856	3,489,599	4,640,193		

Shown above, is data which displays the number of businesses per region for year ending June 2029. This shows the Manawatu region to hold on average 2771 events per year. However, Hospitality New Zealand recognise that this is for the Manawatu region and not specific to Palmerston North. We found that there was not an option to break this data down any further.

Data can be sourced here: <https://www.mbie.govt.nz/assets/business-events-activity-survey-report-year-to-june-2019.pdf>

(b)

Table 5: Number of conferences and conventions and delegate days

Region	Duration			Market share of multi-day events		Delegate days		Market share of multiday events by delegate days
	One day	Two days	>2 days	YE 2019 Q2	YE 2018 Q2	Single day	Multi-day	
Auckland	585	639	416	32%	26%	66,787	323,207	32%
Hamilton & Waikato	237	161	84	7%	8%	15,846	63,845	6%
Bay of Plenty	139	68	50	4%	5%	10,477	38,241	4%
Rotorua	108	71	141	6%	7%	6,141	82,699	8%
Taupo	92	64	80	4%	5%	4,342	28,693	3%
Hawkes Bay	90	31	33	2%	3%	3,491	30,053	3%
Manawatu	129	105	58	5%	7%	9,471	38,447	4%
Wellington	417	440	248	21%	18%	41,025	214,220	21%
Marlborough	40	25	62	3%	3%	3,573	29,543	3%
Nelson	53	30	53	2%	3%	5,632	30,579	3%
Christchurch & Canterbury	168	106	93	6%	6%	18,786	50,381	5%
Dunedin	70	40	50	3%	3%	5,289	29,034	3%
Queenstown	59	48	126	5%	7%	4,577	39,342	4%
Total	2,187	1,828	1,494	100%	100%	195,440	998,283	100%

Shown above is the number of conferences, conventions and delegate days. The report which can be found here: <https://www.mbie.govt.nz/assets/business-events-activity-survey-report-year-to-june-2019.pdf> also shows Manawatu to have had a total of 78728 delegate days for business events relating to special events. After receiving feedback from our members, it appears that business owners generally look to book



46-6

venues and places which have capacity to trade past 11pm. This would take Palmerston North off the map for many businesses across New Zealand when considering a conference and/ or event location.

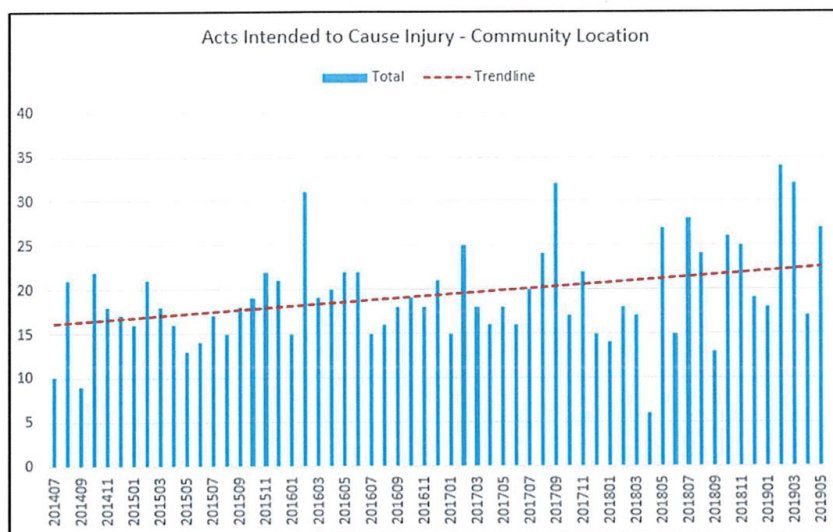
12. Other feedback confirmed that the potential loss of large events to a convention centre in Palmerston North, would result in predicted \$420,000 loss in turnover per annum. Bearing in mind that this is solely to the convention centre itself, and does not include the loss to related accommodation providers, on-licensed premise losses and the loss of custom to restaurants and cafes around the time that the event takes place. This could be a huge detriment to the economic growth in Palmerston North. It is in our view that council should carefully consider the potential economic impact across the city if the proposed LAP is implemented.
13. Hospitality New Zealand believes that Council has an obligation the businesses affected by this draft LAP to coordinate a cost-benefit analysis of the proposed changes in the LAP in order to achieve sound, evidence-based and best practice policy. In our view by failing to do so the Council may not meet its obligations under section 77(1) (b) of the Local Government Act

#### Alcohol Related Harm in Palmerston North

14. Hospitality New Zealand made efforts to contact both the medical officer of health, and the Police to obtain evidence and statistics on alcohol related harm in Palmerston North. The Police kindly supplied us with some evidence to support our request. However, the medical officer of health has since failed to provide us with anything at all. Our conversations with both these authorities was somewhat similar. They both advised us that there was simply not much data or evidence to provide us with.
15. Hospitality New Zealand believe that the evidence provided from the Police is an insufficient quantity and quality of data to warrant the reduction in trading hours for licensees in Palmerston North. The data provided was summed up in a number of graphs. (*see below*)

46-7

(a)



The above graph shows data taken from 2014 to 2019, which represents the acts of intended harm across New Zealand. This graph is also part of the PNCC research report. Although this data appears to trend upward, Hospitality New Zealand believe these figures are not specific enough to Palmerston North or even, to the Manawatu region.

Data can be found here: <https://www.police.govt.nz/about-us/statistics-and-publications/data-and-statistics/victimisations-police-stations>

(b)

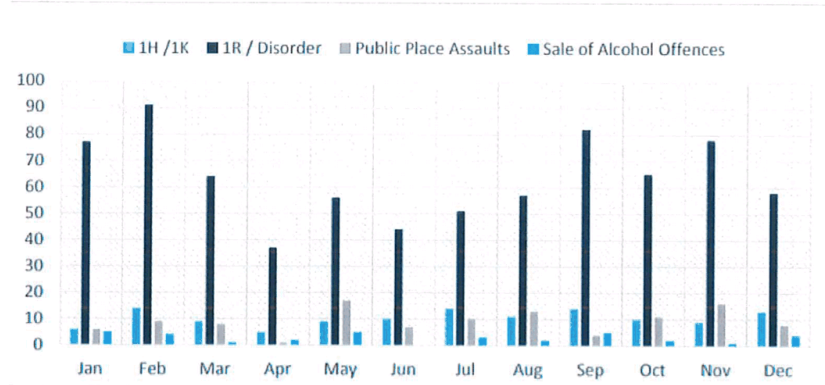
Alcohol Data (Manawatu)	2017	2018	Variance
1R – Breach of Peace (incl. Disorder Data)	3738	3150	-588 (-15.7%)
Sale of Alcohol Offences	58	56	-2 (-3.4%)
Public Place Assault	312	307	-5 (1.6%)
1H/1K Detox/home	614	503	-111 (18%)

The above data was also from Palmerston North Police. This appears to be relatively recent information and confirms a decrease in all offences listed from 2017 to 2018. We will not assume that it has continued to trend downwards for 2019, but unfortunately, we were not provided with any recent data to determine any change in this trend.

46-8

Data sourced from the Alcohol Harm Prevention Officer of Palmerston North.

(c)



The above chart supposedly reflects data on the alcohol related offences in Palmerston North CBD. Whilst Hospitality New Zealand recognise that the numbers of 'disorder' is relatively high, but as mentioned previously, 80% of all alcohol is consumed off a licensed premise. Therefore, our view is that council should be focusing on public areas rather than licensed businesses. Hospitality New Zealand also recognise that there are a number of 'Sale of Alcohol Offences' that happen each month in Palmerston North. Whilst some of these offences may not be from our members in particular, we would like to work with council and Police to understand when and how these happen. This would help us as part of a training strategy to help mitigate these offences in the future. (Ministry of Health, 2019)

Data sourced from the Alcohol Harm Prevention Officer of Palmerston North.

16. The research report from council shows several graphs of data on alcohol consumption and hazardous drinking in Palmerston North. Hospitality New Zealand would like to point out that the LAP proposal is almost flawed by its own reference to research. For example, Figure 28 titled; **Prevalence of Hazardous Drinkers (Total Population) by DHB 2016/17**, shows Palmerston North (*mid-central*) as the second lowest in the whole country (16.2%), in relation to a national average of 21.1%, with 39.9% being the highest. In addition, a second graph, Figure 31 titled; **'Prevalence of Heavy Episodic Drinking (Total Population) at least Weekly, By DHB 2016/17** shows Palmerston North (*mid-central*) as the lowest in the whole country (21.8%) against a national average of 29.3%, with 39.6% being the highest. Other graphs produce similar figures on alcohol related matters, and Palmerston North (*Mid-Central*) does not climb above the fourth lowest in the entire country.
17. Based on the above information, it is in our opinion that this data confirms that licensees in Palmerston North are good operators, and consistently show their

46-9

compliance with the purpose of the Sale and Supply of Alcohol Act 2012 in the prevention of alcohol related harm.

### Pre-loading – The real issue?

18. The Draft Local Alcohol Policy proposes one major change to what currently exists for Palmerston North. The reduction in trading hours for on, off, and club licensees. After conversations with council and our own members, it appears that pre-loading is the main issue confronting both the industry and the Police. Although the research report from council suggests that 93% of all pre-loading takes place within a home. On-licensed premise owners and managers constantly speak of their frustration with customers arriving in town having consumed alcohol earlier in the evening.
19. Currently many patrons will not go out until after having consumed alcohol at a private residence or elsewhere, often not going to licenced premises until 11pm or midnight. This behaviour is not selective of Palmerston North. It happens all over New Zealand. Regions where hours are more restrictive, people will typically go to private parties or public places once a bar has closed and continue to consume alcohol that has been pre purchased in anticipation. By reducing hours across the Palmerston North, Hospitality New Zealand argues that people's behaviours are highly unlikely to change by forcing them into uncontrolled environments sooner.
20. It is of the view of Hospitality New Zealand that the current hours allow for people to disperse naturally and not create issues where large numbers of people are forced out early not ready to go home potentially leading to public disturbance.
21. Limiting On-premise opening hours will have little or no impact on people who are intent on drinking too much. They will simply drink cheap and readily available alcohol from supermarkets in uncontrolled environments. From a harm reduction point of view, it is preferable these people are in a controlled environment and monitored by professionals.

### Summary of Recommendations and Desired Changes

22. Council reference a survey in the research report which was conducted by council in 2015. This survey was sent out to all licensees in Palmerston North to determine what time they frequently trading till. Whilst council assume this survey to be



46-10

accurate for 2019/2020, Hospitality New Zealand would consider it unreasonable for council to simply assume, rather than making an attempt to repeat the survey prior to considering the implementation of the proposed LAP. It is in our opinion that this would be a reasonable effort to obtain the most recent data possible.

23. We submit that the Council consider a later closing time of 3am for on-licensed premise in Palmerston North. This would mean that those businesses who currently have a 3am closing time are not forced to close earlier and face any detrimental effects to the sustainability of their businesses. Hospitality New Zealand believe that an earlier closing time for these businesses would force their patrons to go and drink in an uncontrolled environment, which could result in higher levels of alcohol related harm.
24. Hospitality New Zealand promotes a positive framework for the Industry, Council, Police and other regulators to work together moving forward.
25. We urge the Council to consider that this Draft LAP will considerably affect the livelihood of Hospitality operators, which in turn will be detrimental to employment for Palmerston North

### Concluding Notes

It is in our view, that much of the evidence put forward in support of the PLAP provides little more than suggestive evidence to justify the beneficial effect of restrictions on the opening hours of on-license and off licenced premises, to reduce alcohol related harm and pre-loading in Palmerston North.

Hospitality New Zealand would like to thank council for the opportunity to file a submission on the draft Local Alcohol Policy 2020.

### References

Health Promotion Agency (2017). HPA Annual Report.

<https://www.hpa.org.nz/sites/default/files/NZ%20Alcohol%20Supply%20and%20Demand%20Structure%20Research%20Report%20FEB2018-Final.PDF>

Ministry of Health. (2015). Alcohol use 2012/13: New Zealand Health Survey. Retrieved from <http://www.health.govt.nz/publication/alcohol-use2012-13-new-zealand-health-survey>.

46-11

Ministry of Health. (2016). Annual update of key results 2015/16: New Zealand Health Survey. Retrieved from <http://www.health.govt.nz/publication/annual-updatekey-results-2015-16-new-zealand-health-survey>.

Stats NZ. (2019) Business Demography Statistics. Webpage: <https://figure.nz/chart/tAQeOoJ0aDCZo3ER-KAWNuThrJ3YV0ymz>

47-1

14035107

CENTRAL PALMERSTON NORTH BUSINESS IMPROVEMENT DISTRICT INC

## Palmerston North City Council Draft Local Alcohol Policy 2020

Submission to Palmerston North City Council (PNCC)

From

Central Palmerston North Business Improvement District Inc.  
(The Palmy BID)

Central Palmerston North Business Improvement District Inc.  
PO Box 1535  
Palmerston North  
4410

12<sup>th</sup> December 2019

Contacts: Rob Campbell (Chair) – [rob.campbell@forsythbarr.co.nz](mailto:rob.campbell@forsythbarr.co.nz)  
Amanda Linsley – [amanda@manawatu-chamber.co.nz](mailto:amanda@manawatu-chamber.co.nz)

The Palmy BID is a collective of business within the CBD that will work together to improve the wealth and wellbeing of Palmerston North city. Our aim is to achieve this by better defining and highlighting the identity and environments with the CBD for visitors, locals and businesses.

Our focus is on bringing business together to endorse projects and help create a better Palmerston North. The Palmy BID was incorporated on 16<sup>th</sup> August 2019.

This submission is made after consultation with our Steering Committee and after discussion with CBD Businesses.

### Proposed Local Alcohol Policy 2020

1. The Palmy BID would like to fully support the submission made by the Manawatu Chamber of Commerce.
2. The Palmy BID have had input and have worked in consultation with the Manawatu Chamber of Commerce and have spoken with many businesses within the CBD area that would be affected by this legislation, and others alike.

47-2

CENTRAL PALMERSTON NORTH BUSINESS IMPROVEMENT DISTRICT INC

3. The Palmy BID endorse the statements made by the Manawatu Chamber of Commerce with regards to reasons why we are unable to support this proposed Local Alcohol Policy as it stands.

We appreciate the opportunity to be able to make this submission.

Signed on behalf of The Palmy BID

By;



Rob Campbell  
Interim Chair  
The Palmy BID



48-1

14038107



Palmerston North City Council  
DRAFT LOCAL ALCOHOL POLICY 2020

Submission to Palmerston North City Council (PNCC)  
From  
Manawatu Chamber of Commerce (MCoC)

Manawatu Chamber of Commerce  
Level 2, The Grand Building  
341 Church Street  
P O Box 1535  
Palmerston North

11 December 2019

Mobile: 021 0533071 Email: [amanda@manawatuchamber.co.nz](mailto:amanda@manawatuchamber.co.nz)  
Contact People: Amanda Linsley, CEO, Manawatu Chamber of Commerce  
Blair Alabaster, Chairperson, Manawatu Chamber of Commerce

**Manawatu Chamber of Commerce Board Members:** Paul O'Brien, Guy Dobson, Rob Campbell, Matthew Jeanes, Caren Bailey, Cam Hadfield, Adrian Doyle, Rahui Corbett, Steve Davey and Kirsten Harper.

1. The Manawatu Chamber of Commerce ("MCoC") is a 400+ Business Member organisation, accounting for a large proportion of the City and Region's GDP. This submission is presented to Council by the Board of MCoC after consultation and on behalf of our Members.

**Proposed LOCAL ALCOHOL POLICY 2020**

2. MCoC applaud PNCC on their initiative to consult on this matter and to consider whether a Local Alcohol Policy (LAP) as permitted under the Sale and Supply of Alcohol Act 2012 (the ACT) would be of benefit to the City.
3. MCoC acknowledge that PNCC are only proposing to consult on trading hours at the current time.
4. MCoC do not support the proposed changes to the maximum trading hours for on-licensed premises in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am – 12am the next day, for off-licensed premises to 7am to 10pm and club licensed premises to 8am to 12am the next day.
5. There are a number of reasons why we are unable to support these proposed changes.

Level 2, The Grand Building, Church Street, P O Box 1535, Palmerston North |  
Ph 06 213 9877 | [www.manawatuchamber.co.nz](http://www.manawatuchamber.co.nz) | [info@manawatuchamber.co.nz](mailto:info@manawatuchamber.co.nz)

48-2



- i) We believe that the reduction in hours will not tackle the root of the problem, nor will it solve the problem that it is trying to address. The cause of the problem is people who are 'pre-loading' before coming to town having accessed cheap alcohol elsewhere. Whether the City bars close at 2am or 3am is entirely irrelevant to that issue. We believe a better solution to the issue that exists is to either see an increased police presence or some other way of monitoring the CBD during peak times. The intention being to keep people safe and retain a city-centre vibrancy rather than closing things down and potentially sending the problem elsewhere (back to house-parties etc). We believe that this is a role that could be supported/undertaken by the Central Palmerston North Business Improvement District Inc (The BID). In addition the transport system within the City is not conducive to getting everyone home within a reasonable time (which would assist with the issue), this again is something that should be reviewed and would have the backing of the host premises.
- ii) Closing the on-licensed premises in all other zones earlier (to 12am), will have a number of outcomes, which would likely include commercial detriment. We also understand this could apply to club-licensed premises, but at this stage we have less information around this.
  - a) These establishments have host-responsibility and are committed to ensuring the safety of guests. Closing these establishments earlier with guests **then** going into town would not likely provide a reasonable alternative. It takes an hour to close down most venues safely which means under the proposed policy they would need to set an 11pm closing time to ensure that they could comply.
  - b) Early closure of these venues has an economic impact on not only the venues, but also the City and our Region. It will be more difficult for them in terms of being able to tender for corporate business from outside town and the knock-on effect to other businesses through not having delegates staying in the Region. Domestic delegates to conferences that include dinners/overnight accommodation stay an average of 2.9 nights and spend an average of \$533 per night. The Manawatu currently have 5% of the market share for NZ delegate days and had a total of 78728 delegate days for business events all which would go beyond 11pm for attendance at dinners and functions. Would these corporates still hold their events in our region under the proposed changes when they can go elsewhere (such as the Hawkes Bay who have retained the 3am closing time) and enjoy hospitality for longer? There is a huge potential for loss of turnover for our Region and also for loss of employment within these businesses, plus the knock-on effect.
  - c) MCoC note that the above would not apply to the PNCC owned and operated Conference & Function Centre as it is within the CBD boundary.
- iii) MCoC understand the rationale in proposing the closure of the off-licensed premises an hour early at 10pm, but in reality the vast majority of off-licensed premises within the City close well before 10pm in any event so we don't believe that this is a solution to the pre-loading problem as per i) above.

Level 2, The Grand Building, Church Street, P O Box 1535, Palmerston North |  
 Ph 06 213 9877 | [www.manawatuchamber.co.nz](http://www.manawatuchamber.co.nz) | [info@manawatuchamber.co.nz](mailto:info@manawatuchamber.co.nz)

48-3



Summary

MCoC acknowledges the initiative that PNCC has taken by reviewing the Local Alcohol Policy for our City, but we do not believe that the proposals will remedy the problem that we have with people pre-loading before they come to town. Nor would early closure for many of CBD venues make economic sense for our City or Region. We would welcome the opportunity for further consultation as to how the identified problems can be alleviated whilst not damaging the economic impact for our City.

Yours sincerely

Signed on behalf of the Manawatu Chamber of Commerce Board  
by;

A handwritten signature in black ink, appearing to read 'A Linsley'.

Amanda Linsley  
CEO  
Manawatu Chamber of Commerce

49-1

14036765

11<sup>th</sup> December 2019

Palmerston North City Council  
DX Box 33319  
Palmerston North 4447

Dear Sir/Madam

**Re: Palmerston North City Draft Local Alcohol Policy**

Please find attached a Submission on the above plan lodged on behalf of  
MidCentral District Health Board's Public Health Service.

We wish to speak to our submission.

Yours faithfully



Dr Rob Weir  
Medical Officer of Health

49-2

**SUBMISSION ON PALMERSTON NORTH CITY COUNCIL  
DRAFT LOCAL ALCOHOL PLAN**

To: Palmerston North City Council  
 Submission on: Palmerston North City Council Local Alcohol Plan  
 Name: Public Health Services, MidCentral District Health Board  
 Address: Public Health Unit, MidCentral District Health Board,  
 Private Bag 11-036, Palmerston North 4442  
 Attention: Rob Weir

**Palmerston North City Council Draft Local Alcohol Plan**

MidCentral District Health Board is responsible for improving, promoting and protecting health of the community, pursuant to the New Zealand Public Health and Disability Act 2000, the Health Act 1956 and the Sale and Supply of Alcohol Act 2012. These statutory obligations are carried out under delegation by Public Health Services (PHS).

Health is influenced by a wide range of factors beyond the health sector and so we are grateful for the opportunity to make the following comments.

The PHS is pleased to see the Council is moving forward with a Local Alcohol Policy. It has long been our expressed opinion that a formal alcohol policy would well serve the Council and its community. The Sale and Supply of Alcohol Act 2012 has provided a mechanism that many councils nationwide are utilising to protect and enhance the community; further the Object of the Act and to ultimately simplify the licensing process and reduce conflict in the licensing sphere.

We agree with the expressed objectives of the Policy and we commend those charged with developing the Policy for the thorough and balanced way they have proceeded. In some areas, data is lacking, or difficult to extrapolate in a helpful manner. Other councils' efforts have demonstrated the complexity of the issues and possible pitfalls, and we think PNCC have steered a course that makes some gains for reducing alcohol related harm without over-reaching and miring the parties in interminable, expensive and delaying litigation. We understand the approach is one of incrementalism – making some immediate gains and looking forward to potentially enhancing provisions when the Policy is reviewed.

With that in mind we have the following specific comments:

**Hours:**

**On Licences**

The proposal to move the maximum hours for On-licences back to 2 am is strongly supported.

While the Health sector's concerns are primarily for public health and safety, and the impact on medical systems and their users, we understand that the Council pragmatically desires a balance between an active entertainment economy and the considerations of maximising controls on potential harm and disorder.

49-3

In this light the reduction of hours appears to be a progressive step that is likely to be able to be implemented and make gains without arousing fierce and intractable opposition.

#### Off Licences

The proposed reduction in maximum trading hours for Off-licences to 10pm is also supported.

The price differential between On and Off licence alcohol not only “encourages” drinking at home but has enhanced and entrenched the culture of “pre-loading”. Restricting the opportunity for unplanned “restocking” in the later stages of the evening is likely to have an impact on the amounts of alcohol consumed and the ensuing levels of intoxication and likelihood of harm.

The Police have also noted that assaults in dwelling places are increasing while public place assaults have dropped. Limiting late night “restocking” or impulse purchases may well impact on this also by the mechanism described above.

Practically we note that it is a minority of premises in the city that are open longer than 10pm, and that choosing this time rather than an earlier one – which would impact more premises and their sales – does make it more likely that this measure will come into force.

It is likely that further evidence will be collected before the next review of the policy and this may point towards a further reduction of hours at that time.

#### Location:

We note the Policy does not attempt to impose any restrictions on the locations of licenced premises in the city. We understand the reasoning expressed behind this decision and appreciate both the potential complexity/perversity of locational restrictions and the current lack of perceived problems.

However, for a degree of future-proofing we would suggest a provision saying that “With respect to any new licence applications, the District Licensing Committee shall have regard to the proximity to facilities identified as a sensitive site and the likely impact on that site amenity, and good order.”

While the DLC may always “have regard” to this type of issue, a clause stating that they **must**, followed by a definition of what these sensitive sites are ( e.g. Early childhood centres; Primary and secondary schools; Marae, Places of worship, Alcohol treatment centres. Children’s parks/playgrounds etc), may well reinforce that consideration without the arbitrariness of distance restrictions.

A proviso would also be needed indicating that where a sensitive facility opens in proximity to an existing licensed premises that licensed premises is exempt from this provision.

49-4

**Other matters:**

We would also like to support the intention of reviewing the Policy in two years from its inception. We agree that this will enable the collection of further evidence and the potential to implement further alcohol harm reduction initiatives – such as limiting the issuing of new Off licences - as desired.

REL0639

30-1



Level 1, BNZ Centre | 120 Hereford Street | Christchurch 8011  
 PO Box 2688 | Christchurch 8140 | New Zealand  
 Ph 0508 258 258

13 December 2019

Draft Local Alcohol Policy 2020 Submissions  
 Governance Team  
 Palmerston North City Council  
 Private Bag 11034  
 Palmerston North 4442

To Whom It May Concern

#### **Palmerston North Draft Local Alcohol Policy submission**

Thank you for providing the opportunity for the Health Promotion Agency/Te Hīringa Hauora (HPA) to comment on the Palmerston North City Council draft Local Alcohol Policy (LAP).

#### **HPA wishes to speak to this submission.**

HPA is a Crown agent that supports the health and wellbeing of New Zealanders. Our key role is to lead and support health promotion initiatives to:

- promote health and wellbeing and encourage healthy lifestyles
- prevent disease, illness and injury
- enable environments that support health, wellbeing and healthy lifestyles
- reduce personal, social and economic harm.

HPA has alcohol-specific functions to:

- give advice and make recommendations to government, government agencies, industry, non-government bodies, communities, health professionals and others on the sale, supply, consumption, misuse and harm of alcohol as those matters relate to HPA's general functions
- undertake, or work with others, to research alcohol use and public attitudes to alcohol in New Zealand and problems associated with, or consequent on, alcohol misuse.

#### **LAP DEVELOPMENT**

We congratulate Palmerston North City Council on its commitment to develop a LAP. The development of a LAP provides an opportunity for communities to become involved in how alcohol is sold in their neighbourhoods.

HPA:950677v1



50-2

The object of the Sale and Supply of Alcohol Act 2012 is that the sale, supply, and consumption of alcohol should be undertaken safely and responsibly, and the harm caused by the excessive or inappropriate consumption of alcohol should be minimised<sup>1</sup>. LAPs play an important role in meeting these objectives and provide councils with a mechanism to reflect the needs of the community and to minimise the harm caused by alcohol locally.

We found that the draft policy was easy to read and that the content was easy to understand. A clear, concise policy will not only be easier for your community and licensees to understand but will also be more useful to your District Licensing Committee (DLC).

We would like to commend the Palmerston North City Council on its background report. HPA is aware that many councils are finding it difficult to source good data, especially local data. Given these constraints we note that Palmerston North has provided useful information to assist with the development of the LAP.

## OBJECTIVES OF THE POLICY

LAPs not only provide guidance to DLCs, the Alcohol Regulatory and Licensing Authority and local alcohol retailers, but they also provide an opportunity for communities to be involved in shaping the trading hours, location, number of outlets, and conditions on licensed premises in ways that fit with community desires. Having policy goals and objectives assists with clarity for all those using the LAP, and provides a way to demonstrate how the LAP contributes to wider community aims. HPA is supportive of the goals and objectives of the draft LAP, and they relate well to the object of the Act. At the same time they also reflect the views of the community and align with the Council's strategic direction of a connected and safe community.

## TRADING HOURS

HPA encourages territorial authorities to set maximum trading hours that are appropriate for the location, minimise harm, and take into account the views of the community.

### *On-licensed premises*

Although New Zealand-based studies are limited, there is strong and reasonably consistent evidence from a number of countries that limits on trading hours of on-licensed premises are effective in reducing both consumption and alcohol-related harm. There is an established relationship between on-licence

<sup>1</sup> Sale and Supply of Alcohol Act 2012. <http://www.legislation.govt.nz/act/public/2012/0120/84.0/DLM3339333.html>

50-3

trading hours and levels of harm<sup>2,3</sup> with substantial increases in assaults for every additional hour of trading and vice versa<sup>4</sup>.

Overseas research has demonstrated that reducing on-licence hours late at night can substantially reduce rates of violence, associated ambulance callouts, hospital admissions and alcohol-related harm.<sup>5,6</sup> Given this evidence, we support the hours proposed but encourage Palmerston North to always be evaluating whether the benefits of later trading hours outweigh the harm and costs to the community.

#### *Off-licensed premises*

One New Zealand study has shown that drinkers purchasing alcohol from off-licensed premises after 10pm were more likely to be heavy consumers<sup>7</sup>. There are also suggestions from recent research that limiting off-licence trading hours after 9pm may reduce harm<sup>8,9</sup>.

Many councils who have developed LAPs have taken the opportunity to limit off-licence availability with the most common trading hours being 7am to 9pm/10pm<sup>10</sup>. HPA supports the trading hours proposed and is pleased to see a consistent approach to all off-licences within a territorial boundary having the same trading hours.

#### *Club licences*

HPA supports the proposed hours for club licences. Clubs often attract younger people and are not immune to high levels of harm. If on occasion a club would like to trade later for an event, special licences are available.

#### *Hours element within LAP*

HPA suggests splitting the hours of operation into separate elements for each type of premises and for the onset and end of trading hours. This may save the whole element (ie, start of trading and the

<sup>2</sup> Miller, P 2013, Patron Offending in Night-Time Entertainment Districts (POINTED), monograph series no. 46, National Drug Law Enforcement Research Fund, p. 220;

<sup>3</sup> Manton, E, Room, R, Giorgi, C & Thorn, M (eds.) 2014, Stemming the tide of alcohol: liquor licensing and the public interest, Foundation for Alcohol Research and Education.

<sup>4</sup> Kypri, K, Jones, C, McElduff, P & Barker, D 2011, 'Effects of restricting pub closing times on night-time assaults in an Australian city', *Addiction*, vol. 106, no. 2, pp. 303-10; Rossow, I & Norstrom, T 2012, 'The impact of small changes in bar closing hours on violence. The Norwegian experience from 18 cities', *Addiction*, vol. 107, no. 3, pp. 530-7.

<sup>5</sup> Wilkinson, C., Livingston, M., Room, R. (2016). Impacts of changes to trading hours of liquor licences on alcohol-related harm: a systematic review 2005-2015. *Public Health Res Pract.* 2016;26(4):e2641644

<sup>6</sup> Sanchez-Ramirez DC & Voaklander D (2018) The impact of policies regulating alcohol trading hours and days on specific alcohol-related harms: a systematic review. *Inj Prev.* 2018 Feb;24(1):94-100. doi: 10.1136/injuryprev-2016-042285. Epub 2017 Jun 24.

<sup>7</sup> Casswell, S., Huckle, T., Wall, M., Yeh, L.C. (2014). International Alcohol Control (IAC) study: pricing data and hours of purchase predict heavier drinking. *Alcoholism: Clinical and Experimental Research.* 38(5): 1425-1431

<sup>8</sup> Sher, A, Stockwell, T, Chikritzhs, T, Andréasson, S, Angus, C, Gripenberg, J, Holder, H, Holmes, J, Mäkelä, P, Mills, M, Norström, T, Ramstedt, M, Woods, J. (2018). Alcohol Consumption and the Physical Availability of Take-Away Alcohol: Systematic Reviews and Meta-Analyses of the Days and Hours of Sale and Outlet Density. *J Stud Alcohol Drugs.* 2018 Jan;79(1):58-67.

<sup>9</sup> Atkinson J.A., Prodan A., Livingston M., Knowles D., O'Donnell E., Room R., Indig D., Page A., McDonnell G. & Wiggers J. (2018) Impacts of licensed premises trading hour policies on alcohol-related harms. *Addiction.* 2018 Jul;113(7):1244-1251. doi: 10.1111/add.14178. Epub 2018 Mar 2.

<sup>10</sup> Jackson, N. (2016). A review of Territorial Authority progress towards Local Alcohol Policy development. Auckland: Alcohol Healthwatch

50-4

end of trading) being deemed unreasonable if ARLA only have an issue with one component of the element.

By way of example, if an objector appeals a resubmitted provisional LAP to ARLA on the grounds that the start and finish of trading is unreasonable for a type of licensed premises then ARLA decides that the later hours are reasonable but the earlier ones are not, then they would have no choice but to rule the whole element as unreasonable as it was all part of one element. This was the situation in the Auckland Provisional LAP appeal<sup>11</sup>.

### Recommendation

1. That trading hours are separated out into individual elements.

## DENSITY PROVISIONS

HPA notes that the draft policy has no provision relating to the number/density of outlets. The overwhelming majority of New Zealand<sup>12,13</sup> and international studies<sup>14</sup> find that the more alcohol outlets of all types there are in a region the more evidence there is of crime and violence. The evidence also shows that the demographic make-up of the area is a factor in the strength of this association<sup>15</sup>.

While there is consistency about increased harms linked to increased density, there are mixed conclusions over whether increased consumption results from increased density. Positive associations have been found between alcohol outlet density and both individual level binge drinking and alcohol-related problems which are independent of individual and neighbourhood socioeconomic status<sup>16</sup>. However, Babor et al<sup>17</sup> found that the evidence in support of links between outlet density and consumption was mixed. One alternative explanation is that dense clustering of alcohol outlets in entertainment districts attracts violence prone patrons and increases the number of interactions among drinkers, which in turn increases the likelihood of violent incidents<sup>18</sup>.

### Off-licence premises

<sup>11</sup> Redwood Corporation Limited vs Auckland City Council [2017] NZ ARLA PH 247-254 sections 158-159.

<sup>12</sup> Cameron, M.P., Cochrane, W., Gordon C., & Livingston M. (2016a). Alcohol outlet density and violence: a geographically weighted regression approach. *Drug and alcohol review*

<sup>13</sup> Cameron, M.P., Cochrane, W., Gordon C., & Livingston M. (2016b). Global and locally-specific relationships between alcohol density and property damage: Evidence from New Zealand. *Australasian Journal of Regional Studies*, The, 22(3), 331.

<sup>14</sup> Taylor N., Miller P., Coomber K., Mayshak R., Zahnow R., Patafio B., Burn M. & Ferris J. (2018) A mapping review of evaluations of alcohol policy restrictions targeting alcohol-related harm in night-time entertainment precincts. *Int J Drug Policy*. 2018 Dec;62:1-13. doi: 10.1016/j.drugpo.2018.09.012. Epub 2018 Oct 19.

<sup>15</sup> Cameron, M. P., Cochrane, W., Gordon, C., & Livingston, M. (2013). *The locally-specific impacts of alcohol outlet density in the North Island of New Zealand, 2006-2011*. Research report commissioned by the Health Promotion Agency. Wellington: Health Promotion Agency.

<sup>16</sup> Connor J. Kypri K., Bell M. & Cousins K. (2011). Alcohol outlet density, levels of drinking and alcohol-related harm in New Zealand: A national study. *Journal of epidemiology and community health*. 65. 841-6. 10.1136/jech.2009.104935.

<sup>17</sup> Babor et al (2010). *Alcohol no ordinary commodity: Research and public policy*. Second Edition. Oxford University Press.

<sup>18</sup> Gruenewald P. 2007. 'The spatial ecology of alcohol problems: niche theory and assortative drinking'. *Addiction*, 102: 870-878. doi: 10.1111/j.1360-0443.2007.01856.x

50-5

When off-licensed premises cluster together, particularly in low income suburban areas, competition between outlets has been found to lead to lower prices, longer opening hours, and later weekend closing times<sup>19</sup> which stimulates demand and contributes to alcohol-related harm.

There is a broad range of alcohol-related harms, including domestic violence anti-social behaviour and sexual offences and other alcohol-related harms<sup>20,21</sup> linked to high density of off-licences. One study has suggested that for off-licences, the amount of alcohol sold is a more significant factor than outlet density<sup>22</sup>.

#### *On-licence and club premises*

On-licence density is significant in inner city entertainment areas in terms of violence and assaults. Bar and nightclub density has a significant positive association with all categories of police events and with motor vehicle accidents<sup>23</sup>.

Overall, the evidence behind outlet density contributing to alcohol-related harm is strong. We therefore support councils to utilise tools that will assist with limiting the numbers of outlets. A number of councils around New Zealand have developed measures for reducing density within their draft LAPs, especially in communities where there is already high community stress and/or alcohol-related harm. Measures include local impact reports, implementing freezes on new off-licences (or specifically bottle stores), and implementing caps on the number of off-licences (or specifically bottle stores) in a particular area. We therefore encourage Palmerston North to consider a policy around whether further licences (or licences of a particular kind or kinds) should be issued for premises in the district, or any stated part of the district.

#### **Recommendation**

2. That Palmerston North includes a policy around the number of licensed premises (density).

#### **SENSITIVE SITES**

HPA notes that the draft policy has no provisions relating to sensitive sites. The Law Commission's consultation found that communities feel strongly about the location of premises where alcohol is

<sup>19</sup> Cameron, M.P., Cochrane, W., McNeill, K. Melbourne, P., Morrison, S.L., Robertson, N. (2010b). *The spatial and other characteristics of liquor outlets in Manukau City: The impacts of liquor outlets report no.3*. Wellington: Alcohol Advisory Council of New Zealand.

<sup>20</sup> Livingston, M 2008, 'A longitudinal analysis of alcohol outlet density and assault, *Alcoholism: Clinical and Experimental Research*, vol. 32, no. 6, pp. 1074-9.

<sup>21</sup> Livingston, M 2013, 'To reduce alcohol-related harm we need to look beyond pubs and nightclubs', *Drug and Alcohol Review*, vol. 32, no. 2, p. 113-14.

<sup>22</sup> Liang, W & Chikritzhs, T 2011, 'Revealing the link between licensed outlets and violence: counting venues versus measuring alcohol availability', *Drug and Alcohol Review*, vol. 30, no. 5, pp. 524-35.

<sup>23</sup> Cameron, M. P., Cochrane, W., Gordon, C., & Livingston, M. (2013). *The locally-specific impacts of alcohol outlet density in the North Island of New Zealand, 2006-2011*. Research report commissioned by the Health Promotion Agency. Wellington: Health Promotion Agency.

50-6

sold<sup>24</sup>. The purpose of policies around location are to protect the most vulnerable and to limit the growth of premises in areas that have sensitive sites. Therefore, HPA is disappointed that the council has not considered the location of licensed premises by reference to proximity to facilities of a particular kind or kinds.

The majority of draft LAPs (62%) have contained restrictions on licensed premises around sensitive sites. Types of policies include: requiring impact reports; requiring the DLC to consider sensitive sites in their decision making; consulting neighbours; and limiting new premises within close proximity (40m to 500m). The most common examples of sensitive sites in draft policies include schools or education facilities, early childhood centres, playgrounds, places of worship, recreational facilities, health facilities, alcohol treatment centres, Marae, community facilities, high crime areas and high deprivation areas.

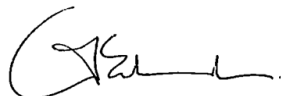
### **Recommendation**

3. HPA recommends that the council includes a policy on sensitive sites covering location of licensed premises by reference to proximity to site or facilities of a particular kind or kinds.

### **CONCLUSION**

Once again, thank you for the opportunity to comment on the Palmerston North draft LAP. Please do not hesitate to contact Cathy Bruce, Principal Advisor Local Government, e-mail [c.bruce@hpa.org.nz](mailto:c.bruce@hpa.org.nz), phone 03 963 0218 if you would like to discuss any parts of this submission further.

Yours sincerely



Cath Edmondson  
General Manager Policy, Research and Advice

<sup>24</sup> Law Commission. (2010). *Alcohol in our Lives: Curbing the Harm: A report on the review of the regulatory framework for the sale and supply of liquor*. Wellington: Law Commission.

51-1

14036 416

Cancer Society Manawatu Centre Submission to the Palmerston North City Council Draft  
Alcohol Policy 2019

Organisation: Cancer Society of New Zealand Manawatu Centre Inc.		
Representative Name: Mrs Kerry Hocquard, Community Health Advocate		
Postal Address: Addis House, PO Box 5170, Palmerston North		
Phone: (mobile) 027 3378166	(hm)	(wk) 06 356 5355
Fax: 06 356 7804	Email: Kerry.hocquard@cancercd.org.nz	

Do you want to speak to the Council in support of your submission: Yes

#### ABOUT THOSE MAKING THIS SUBMISSION:

The Cancer Society of New Zealand Manawatu Centre aims to reduce the rate of cancer in the Manawatu region caused by exposure to smoking, both active and secondhand exposure, UVR and the harmful effects of alcohol.

Cancer Society of New Zealand Manawatu Centre Incorporated is a charitable organisation covering the Midcentral DHB region of Horowhenua, Manawatu, Tararua and Palmerston North city.

Our core services are in Health Promotion, Supportive Care, Information and Research. We work with our communities to reduce the incidence and impact of cancer.

51-2

## EXECUTIVE SUMMARY

The Cancer Society acknowledges Palmerston North City Council (PNCC) for its recognition of the vital role that Council plays in the health and wellbeing of our community. The supporting plans Healthy Community, Connected Community Strategy, Creative and Liveable Strategy, Events and Festivals, Active Community, and Connected Community Strategy give life to the vision of "Palmerston North residents being able to enjoy the benefits of living in a small city, with the advantages of a big city." (1).

Research, both internationally and that conducted in New Zealand, consistently supports the contention that:

1. Alcohol is a carcinogen and causes harm
2. Reducing consumption will reduce harm from alcohol
3. Reducing hours of availability will reduce consumption of alcohol
4. As alcohol consumption reduces, so does alcohol attributable cancer risk

New Zealand is ranked 2nd out of 50 countries worldwide by the World Cancer Research Fund, for the numbers of cancer incidents based on Age Standardised rate per 100,000 people (2).

To reduce the burden of morbidity and mortality caused by alcohol use, the Cancer Society of New Zealand has recommended the New Zealand Government and local governments throughout the country implement policies that meaningfully reduce the availability and promotion of alcohol in New Zealand communities.

Cancer Society New Zealand proposes that local alcohol policies being implemented across New Zealand is an opportunity to reduce health harms, which could have a significant impact on the number of new cancer incidents presenting.

51-3

Thank you for the opportunity to comment on the proposed Palmerston North City Council's Draft Local Alcohol Policy 2020.

The Cancer Society Manawatu has enjoyed a collaborative relationship over a number of years with Palmerston North City Council in its journey to strengthen commitment to community health and wellbeing, and we thank you for this.

The Cancer Society Manawatu congratulates Palmerston North City Council on the Draft Local Alcohol Policy being aligned with the Connected Community Strategy goal of a "connected and safe community" (3).

The Palmerston North City Local Alcohol Policy is an opportunity to make a 'future thinking' response to the challenge that alcohol presents to health outcomes for our communities, response services and resource availability.

The Cancer Society response to the Palmerston North City Council Draft Local Alcohol Policy is based on concern relating to population health and the health burden that alcohol presents.

The Cancer Society of New Zealand has recognised the growing international importance of the relationship between alcohol and the development of some cancers.

The International Agency for Research on Cancer classed alcohol as a Group 1. carcinogen (the highest IARC classification) having a causal association between alcohol consumption and cancers of the mouth, pharynx, larynx, oesophagus, bowel, liver, stomach and breast (in women). There is accumulating evidence that alcohol drinking may also be associated with cancers of the lung, pancreas, prostate, melanoma and basal cell carcinoma (4).

According to Professor Jennie Connor's 2016 study Drinking alcohol increases the risk of several types of cancer, and was responsible for 236 cancer deaths under 80 years of age in New Zealand in 2012. (5).

Recent research undertaken by the Boston University School of Medicine (BUSM) and featured in the April 2013 American Journal of Public Health stated *that Alcohol remains a major contributor to cancer mortality. Higher consumption increases risk but there is no safe threshold for alcohol and cancer risk. Reducing alcohol consumption is an important and underemphasised cancer prevention strategy.* (6).

In the evidence review undertaken by the Cancer Society (2014) Alcohol is a major contributor to the overall burden of death, disease and injury in New Zealand. It was the 6th leading risk factor for health loss in New Zealand in 2006 after tobacco use, high body mass index, high blood pressure, high blood glucose and physical inactivity. It is possible that alcohol also contributes to the prevalence of other risk factors for chronic disease e.g., high blood pressure, obesity and excess body weight.(7).

The combined use of tobacco and alcohol multiplies the risk of developing cancer of the oral cavity, pharynx, larynx and oesophagus. This combined risk far exceeds that from the use of either one of these substances alone. The relative risk of oral cancer and throat cancer (i.e. cancer of the pharynx and larynx) is estimated to be up to 7 times greater



51-4

among those who smoke but do not drink, up to 6 times greater among those who drink but do not smoke, and over 35 times greater for those who both smoke and drink compared with those who neither smoke nor consume alcohol. (7).

Local alcohol policies across New Zealand give us the opportunity to reduce health harms which could have a significant impact on the number of new cancer incidents presenting. Local alcohol policies also have the potential to not only impact upon alcohol harm reduction on a local and national scale but also within the global context. New Zealand is ranked 2nd out of 50 countries worldwide by the World Cancer Research Fund, for the numbers of cancer incidents based on Age Standardised rate per 100,000 people. New Zealand's rate of new cancer cases per 100,000 people - age-adjusted and as at 2016 - stood at 542.8. (2)

#### **PNCC Draft Local Alcohol Policy Proposals**

##### Issuing further licences

*A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences.*

*The Council is not proposing to restrict the number of licences issued. \**

Comment: Proximity to schools and other community facilities catering to children, healthcare facilities, and particularly mental health and drug and alcohol services needs to be considered in granting a new licence.

##### Trading hours

*A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours.*

*The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day. \**

Comment: The Cancer Society Manawatu is supportive of the move to reduce trading hours proposed by the Local Alcohol Policy.

It is widely evidenced that a key factor in reducing alcohol harm is to reduce consumption via reduced availability of alcohol. In Alcohol: No ordinary commodity, Babor, Caetano & Casswell (2010) concluded from global and national evidence that..." restricting trading hours is the most effective and cost-effective measure available to policymakers to reduce alcohol-related harm associated with licensed venues" (8).

Barbor et al (2010) summarise the evidence as follows "Research indicates strongly that as alcohol becomes more available through commercial or social sources, consumption and alcohol-related problems rise. Conversely, when availability is restricted, use and

51-5

*associated problems decrease. Reducing availability can be achieved either through reducing hours of opening, or numbers of retailers.*

#### Off-Licences

The Law Commission 'Curbing the Harm' report in 2010 stated that alcohol had become, "... normalised after being available for more than 20 years among the foods sold in our supermarkets and local groceries. In a retail sense, alcohol has become no different from bread or milk and is often sold at cheaper prices than these commodities" (9).

Reducing trading hours to less than the National maximum trading hours will potentially reduce supply. Reducing the hours that alcohol can be purchased at off-licenses including supermarkets, grocery stores and bottle stores is a positive step as it helps to create understanding that alcohol should not be regarded as 'an ordinary commodity' this will be supported by the restrictions placed on supermarkets under the Sale and Supply of Alcohol Act 2012 to display and promote alcohol within a single area in their stores. This conclusion was supported by Huckle & Parker's research (2019) cited by PNCC Local Alcohol Policy 2020 Research Report (11), stating that as two thirds of the drinkers purchasing later from on/off-licensed premises "drank at levels placing them at risk of harm, further restrictions to closing times is in line with the aim of the Sale and Supply of Alcohol Act 2012, to minimise the harm from alcohol. (10).

Cancer Society urges PNCC to include restrictions on advertising signage dimensions, number and location within Off Licences. This would make a strong statement about reducing excessive marketing of alcohol within our community.

Restricting what can be viewed from outside an off license would be a positive measure which would support the World Health Organisation (2010) recommendation that "... particular focus should be given to protect children and young adults from the pressures to drink." (12).

Research has consistently shown an association between alcohol marketing and early drinking initiation of young people (for example billboards and signs outside bottle shops and taverns) and early drinking initiation. (13)

#### Location

*A local alcohol policy can include restrictions on where new licensed premises can be located.*

*The Council is not proposing any location restrictions. \**

Comment:

Cameron, M.P., Cochrane, W., & Livingston, M. (2016), in a study on the relationship between alcohol outlets and harms, highlighted the need to consider the density and location of alcohol outlets using an equity lens. From an equity point of view, impacts of alcohol outlet density are a key concern of community stakeholders (particularly given that alcohol outlet density has been shown to be highest in poorer and more disadvantaged areas. Past research in New Zealand has demonstrated that alcohol outlet density and proximity to alcohol outlets are related to a range of indicators of harm, including problem drinking, violent and other and motor vehicle accidents (14).

51-6

One-way door restrictions

*A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time.  
The Council is not proposing a mandatory one-way door restriction. \**

Comment: Although predominantly an issue for emergency services and policing, a one-way door restriction would help contribute to a reduction in alcohol consumption. The Alcohol Advisory Council of New Zealand Evaluation of the Christchurch city one-way door intervention - Final report (2008) stated that

"...With the exclusion of minor assault data, violence offences on Saturday-Sunday night decreased by 22% during the time in which a one-way door policy was in effect (15).

Discretionary conditions

*A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted.  
The Council has not included any discretionary conditions in the draft policy. \**

Comment: Special licences should not exceed time limits imposed for on licence premises to offer consistency and consolidate the public health message about alcohol health harms across our communities.

Large scale events should be considered from a risk management perspective and all special licence applications should complete an alcohol Risk Management plan as part of the application process.

Special consideration needs to be given to the messages we give to schools about special licences and schools need to consider the impact of alcohol being present upon young people, and be supported to choose 'alcohol free' events for the school community as much as possible. Those applying for special licences need to adhere to 'responsible hosting' for the event, which should specify a commitment to managing alcohol consumption in a manner that avoids intoxication.

We would encourage Council to consider reduction in club trading hours during the week. Reducing harm within the club environment is of particular importance as many will be cited in residential areas and clubs are more likely to host family events at which minors are present.

This is the time for our council to continue building on the commitment made by the Council and the Cancer Society to strengthen the health and wellbeing of our community, and subsequently reduce the incidence and impact of cancer. We all have a role to play in finding a solution, and the Cancer Society offers support to the Council to do this.

51-7

## References:

1. PNCC Healthy Community Plan 2018-2021. Retrieved from <https://www.pncc.govt.nz/media/3130996/healthy-community-plan-2018.pdf>
2. World Cancer Research Fund (n.d) Global cancer data by country: Exploring which countries have the highest cancer rates. Retrieved from <https://www.wcrf.org/dietandcancer/cancer-trends/data-cancer-frequency-country>
3. Connected Community Strategy Palmerston North Te Kaunihera o Papaioea Palmerston North City Council (2018). Retrieved from <https://www.pncc.govt.nz/media/3130973/connected-community-2018.pdf>
4. International Agency for Research on Cancer (2012). IARC monographs on the evaluation of carcinogenic risks to humans, volume 100E. Consumption of Alcoholic Beverages. Lyon, France. Available from: <https://monographs.iarc.fr/wp-content/uploads/2018/06/mono100E-11.pdf>
5. Connor JL, Kydd R, MacLennan B, Shield K, Rehm J. Alcohol-attributable cancer deaths under 80 years of age in New Zealand. Drug and Alcohol Review 2016 DOI: 10.1111/dar.12443
6. David E. Nelson, Dwayne W. Jarman, Jürgen Rehm, Thomas K. Greenfield, Grégoire Rey, William C. Kerr, Paige Miller, Kevin D. Shield, Yu Ye, and Timothy S. Naimi. Alcohol-Attributable Cancer Deaths and Years of Potential Life Lost in the United States. American Journal of Public Health: April 2013, Vol. 103, No. 4, pp. 641- 648.
7. Cancer Society New Zealand Position Statement on Alcohol and Cancer Risk (2014). Retrieved from <https://cancernz.org.nz/assets/Alcohol-and-cancer/Alcohol-and-Cancer-Risk-26Jun2014.pdf>
8. Babor T, Caetano C, Casswell S et al. 2nd edition. (2010). Alcohol: No Ordinary Commodity-Research and Public Policy. Oxford: Oxford University Press.
9. New Zealand Law Commission. Alcohol in our lives: curbing the harm. 'A Report on the review of the Regulatory Framework for the sale and Supply of Liquor: (Law Commission report; no. 114)
10. Huckle, T. & Parker, K. (2019). Alcohol purchasing behaviour of drinkers: National and local purchasing times. Wellington: Health Promotion Agency, pp. 13-14. 10.

11. PNCC (n.d). Local alcohol policy 2020 research report: Information in support of the development of the Palmerston North City Council Local Alcohol Policy. Palmerston North: Author.
12. World Health Organisation (2010). Global strategy to reduce the harmful use of alcohol. Retrieved from <https://preventionconversation.org/wp-content/uploads/2015/04/alcstratenglishfinal.pdf>
13. Jones, S. & Magee, C. (2011). Exposure to Alcohol Advertising and Alcohol Consumption among Australian Adolescents Alcohol and Alcoholism 46, (5) pp. 630-637. doi: 10.1093/alcalc/agr080
14. Cameron, M.P., Cochrane, W., & Livingston, M. (2016). The relationship between alcohol outlets and harms: A spatial panel analysis for New Zealand, 2007-2014. Wellington: Health Promotion Agency.  
Retrieved from <https://www.hpa.org.nz/research-library/research-publications/the-relationship-between-alcohol-outlets-and-harm-0>
15. Louise Kirkwood and Paula Parsonage (2008) Evaluation of the Christchurch city one-way door intervention. Alcohol Advisory Council of New Zealand and the Accident Compensation Corporation. Retrieved from [https://www.hpa.org.nz/sites/default/files/imported/field\\_research\\_publication\\_file/One\\_Way\\_Door.pdf](https://www.hpa.org.nz/sites/default/files/imported/field_research_publication_file/One_Way_Door.pdf)

52-1

14037088



## Submission on the Palmerston North City Council Draft Local Alcohol Policy

December 13, 2019

Alcohol Healthwatch is an independent charitable trust working to reduce alcohol-related harm. We are contracted by the Ministry of Health to provide a range of regional and national health promotion services. These include: providing evidence-based information and advice on policy and planning matters; coordinating networks and projects to address alcohol-related harms, such as alcohol-related injury and fetal alcohol spectrum disorder; and coordinating or otherwise supporting community action projects.

Thank you for the opportunity to provide feedback on the Palmerston North City Council Draft Local Alcohol Policy.

We would appreciate being contacted about the possibility of providing an oral submission.

If you have any questions on the comments we have included in our submission, please contact:

Nathan Cowie  
Health Promotion Advisor  
Alcohol Healthwatch  
P.O. Box 99407, Newmarket, Auckland 1149  
P: (09) 520 7039  
E: [nathan@ahw.org.nz](mailto:nathan@ahw.org.nz)

52-2

## Introduction

1. Firstly, we commend the Palmerston North City Council on their commitment to develop their Local Alcohol Policy (LAP) despite earlier setbacks. It is clear that the Council are acknowledging and responding to community concerns regarding the negative impact of alcohol use in their city. This clearly aligns with the priority objective of the Sale and Supply of Alcohol Act 2012 (hereon referred to as the 'Act') being to "improve community input into local alcohol licensing decisions".
2. We wish to acknowledge the efforts of the policy team, Council members and stakeholders in developing the LAP on behalf of their community. We further acknowledge the effort and expertise that Council officers have put into preparing the Local Alcohol Policy Research Report<sup>1</sup> to inform the development of Palmerston North City Council's Local Alcohol Policy.
3. We strongly believe that a LAP is a package of measures which, when used comprehensively, can significantly minimise rates of hazardous drinking and subsequent alcohol-related harm. For this reason, we recommend that the LAP is considered not just as a collection of isolated elements but as a cohesive package to reduce alcohol-related harm, insofar as can be achieved with measures relating to licensing.
4. A LAP which has the effect of reducing the overall availability of alcohol has significant potential to further minimise alcohol-related harm and improve community well-being. Measures that reduce accessibility and availability of alcohol have particular benefits for those who experience significant inequities in harm (i.e. Māori and those socio-economically disadvantaged). By incorporating evidence-based measures to address the physical and temporal availability of alcohol, a LAP can support other harm reduction interventions in the local area and assist in sending a strong signal to communities regarding the harms associated with alcohol consumption.
5. The content of a LAP must be determined on its ability to contribute to achieving the object (section 4) of the Sale and Supply of Alcohol Act 2012,<sup>2</sup> that being:
  - (a) *The sale, supply, and consumption of alcohol should be undertaken safely and responsibly; and*
  - (b) *The harm caused by the excessive or inappropriate consumption of alcohol should be minimised.*

*For the purposes of subsection (1), the harm caused by the excessive or inappropriate consumption of alcohol includes—*

  - (a) *any crime, damage, death, disease, disorderly behaviour, illness, or injury, directly or indirectly caused, or directly or indirectly contributed to, by the excessive or inappropriate consumption of alcohol; and*
  - (b) *any harm to society generally or the community, directly or indirectly caused, or directly or indirectly contributed to, by any crime, damage, death, disease, disorderly behaviour, illness, or injury of a kind described in paragraph (a).*
6. Therefore, a LAP must seek to do two things: Firstly, it needs to **minimise** alcohol-related harm in Palmerston North. Secondly, it needs to **prevent** further alcohol-related harm from happening (where able). Given alcohol is, by far, the most harmful of all drugs available in society<sup>3,4</sup>, residents deserve the strongest protections available from its range of harms.

52-3

7. In particular, the council must consider the burden of alcohol-related harm on Māori. Māori are significantly more likely to drink hazardously than non-Māori<sup>5,6,7</sup>, and experience higher levels of both acute and chronic health harm from alcohol.<sup>8,9</sup> Research on premature deaths and disability attributable to alcohol has shown that alcohol-related mortality in Māori was double that of non-Māori in 2007.<sup>5</sup>
8. Young Māori males (15-24 years) have been shown to have disproportionately higher risks of hazardous drinking from living close to licensed outlets<sup>10</sup> and tamariki Māori have at least five times the exposure to alcohol advertising compared to European/other children, with a significant proportion of this exposure arising from shop-front advertising and signage.<sup>11</sup>
9. As noted in the Local Alcohol Policy Research Report,<sup>1</sup> Palmerston North has a higher proportion of Māori than New Zealand as a whole and expects continued strong growth in the Māori population over time.
10. Alcohol Healthwatch **supports** Councils around the country to develop wider alcohol harm reduction strategies that extend beyond licensing issues covered in a local alcohol policy. We further recommend Councils contribute to discussions on alcohol policy at a national level with a view to influencing alcohol consumption and related harms at a local level. While alcohol remains more affordable than ever before<sup>12</sup>, it is a hard ask for Territorial Authorities to create a paradigm shift in the local drinking culture.

#### **Prevalence of hazardous drinking in the MidCentral DHB area**

11. The LAP proposal notes that a key objective of the policy is to minimise the harm of excessive and inappropriate drinking.
12. Unfortunately, alcohol consumption data from New Zealand's largest, annual national health survey (the New Zealand Health Survey) does not aggregate data to the level of a Territorial Authority. Data is available at the level of the District Health Board.
13. Whilst data from MidCentral DHB is relevant to informing the proposed local alcohol policy, we recognise that other urban and rural areas are also included within the DHB boundaries (e.g. Levin, Dannevirke, Feilding, etc.).
14. Alcohol Healthwatch requests caution in the application of data from the New Zealand Health Survey 2016/17 at the level of the District Health Board. This data, presented in the Local Alcohol Policy Research report, has omitted the confidence intervals of the prevalence estimates.
15. Whilst the age-adjusted prevalence of hazardous drinking in the MidCentral DHB area was somewhat lower than the national average in 2016/17 (16.2% vs. 21.1%), Figure 1 overleaf shows the lower and upper confidence intervals which contain the true value of prevalence of hazardous drinking. The 95% confidence interval for the MidCentral estimate of 16.2% is 10.7% to 23.7%, whilst the interval for the 21.1% estimate for New Zealand is 19.9% to 22.4%.



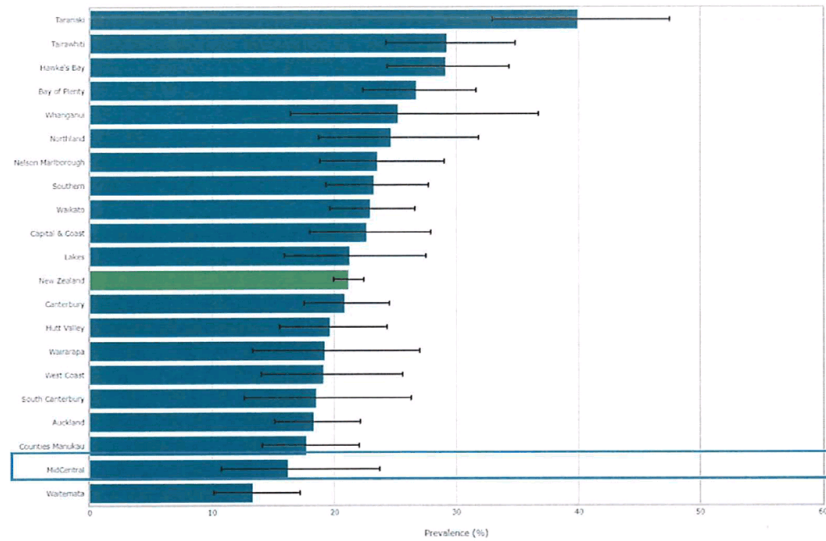


Figure 1. Prevalence (%) of hazardous drinking as reported in the New Zealand Health Survey 2016/17, by DHB

16. As such, the confidence interval of the prevalence estimate for MidCentral DHB overlaps with the national confidence intervals, thereby showing no significant difference between MidCentral DHB and New Zealand in the prevalence of hazardous drinking.
17. Although much older, a more reliable set of data is available from the combined 2011-2014 New Zealand Health Surveys. The combination of three survey datasets produces a larger sample size, with narrower confidence intervals on the prevalence of hazardous drinking. All data is available at <http://www.healthspace.ac.nz/>.<sup>13</sup> Although it is a much older dataset, it should be noted that hazardous drinking has remained stable in New Zealand since 2014. A factsheet showing the national trends in hazardous drinking is attached at the end of this submission.
18. Examination of the prevalence of hazardous drinking using this older, but much larger, dataset shows no significant differences in the prevalence of hazardous drinking between MidCentral DHB and New Zealand for any demographic group characterised by age and sex (Figures 2 to 8, MidCentral DHB outlined in a blue box).
19. Figure 2 overleaf shows the age-standardised prevalence of hazardous drinking in the total population, by DHB, in the combined New Zealand Health Surveys. There is no significant difference between the prevalence in MidCentral DHB and New Zealand.

52-5

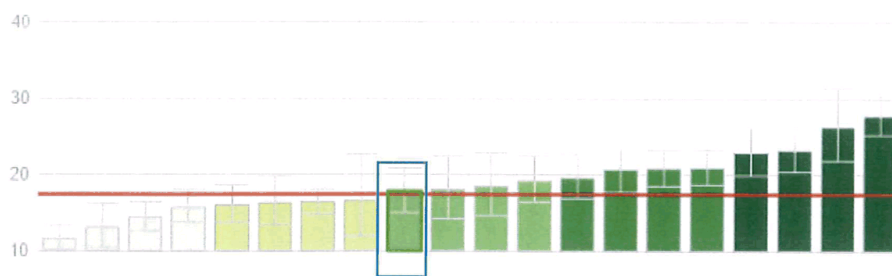


Figure 2. Age-standardised prevalence (%) of hazardous drinking in the total population, by DHB (New Zealand Health Surveys 2011/2014)

20. Figure 3 below shows the age-standardised prevalence of hazardous drinking among males, by DHB, in the combined New Zealand Health Surveys. There is no significant difference between the prevalence in MidCentral DHB and New Zealand.

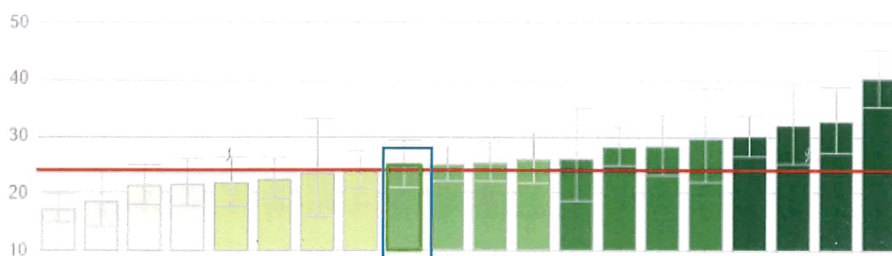


Figure 3. Age-standardised prevalence (%) of hazardous drinking among males, by DHB (New Zealand Health Surveys 2011/2014)

21. Figure 4 below shows the age-standardised prevalence of hazardous drinking among females, by DHB, in the combined New Zealand Health Surveys. There is no significant difference between the prevalence in MidCentral DHB and New Zealand.

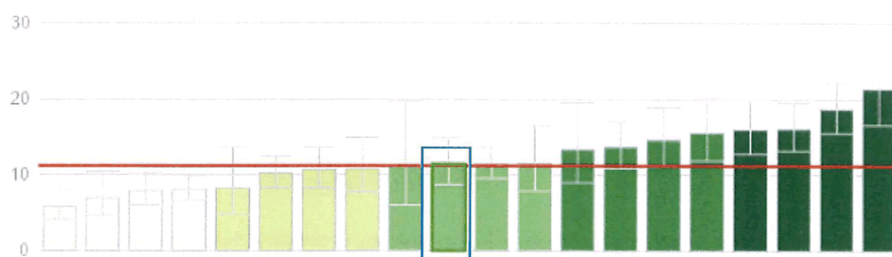


Figure 4. Age-standardised prevalence (%) of hazardous drinking among females, by DHB (New Zealand Health Surveys 2011/2014)

22. Figure 5 overleaf shows the crude prevalence of hazardous drinking among 15-24 year olds, by DHB, in the combined New Zealand Health Surveys. There is no significant difference between the prevalence in MidCentral DHB and New Zealand.

52-6

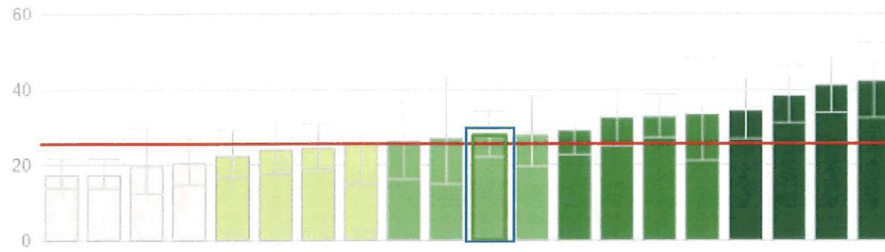


Figure 5. Crude prevalence (%) of hazardous drinking among 15-24 yr olds, by DHB (New Zealand Health Surveys 2011/2014)

23. Figure 6 below shows the crude prevalence of hazardous drinking among 25-44 year olds, by DHB, in the combined New Zealand Health Surveys. There is no significant difference between the prevalence in MidCentral DHB and New Zealand.

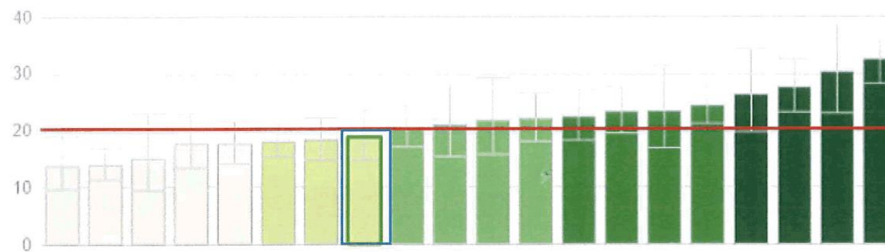


Figure 6. Crude prevalence (%) of hazardous drinking among 25-44 yr olds, by DHB (New Zealand Health Surveys 2011/2014)

24. Figure 7 below shows the crude prevalence of hazardous drinking among 45-64 year olds, by DHB, in the combined New Zealand Health Surveys. There is no significant difference between the prevalence in MidCentral DHB and New Zealand.

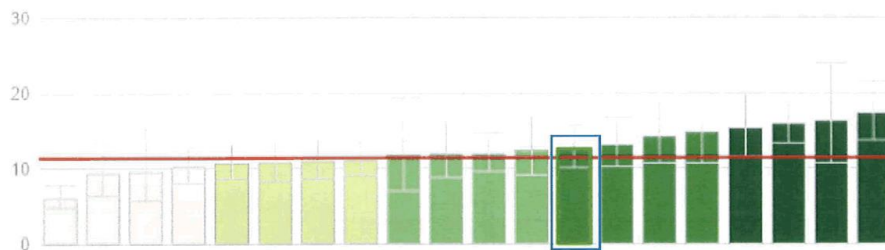


Figure 7. Crude prevalence (%) of hazardous drinking among 45-64 yr olds, by DHB (New Zealand Health Surveys 2011/2014)

25. Figure 8 overleaf shows the crude prevalence of hazardous drinking among those aged 65 years and over, by DHB, in the combined New Zealand Health Surveys. There is no significant difference between the prevalence in MidCentral DHB and New Zealand.

52-7

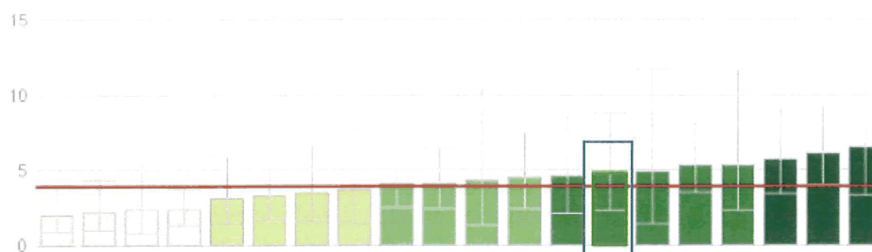


Figure 8. Crude prevalence (%) of hazardous drinking among 65+ yr olds, by DHB (New Zealand Health Surveys 2011/2014)

26. In relation to inequities, 35.9% of Māori men in the MidCentral DHB reported hazardous drinking in 2011-2014 compared to 20.7% of non-Māori.
27. Therefore, the data that is available suggests that Palmerston North has a similar profile of hazardous drinking to the national population. Similar to national data, males are more likely to drink hazardously than females.
28. Strategies that target male drinking, in particular, will therefore be required in the MidCentral DHB region. This will bring benefits not just to the drinker, but also to those harmed by the drinking of others (being disproportionately women and children).<sup>14</sup>
29. In reality, there is no Territorial Authority that is immune from alcohol-related harm. Every resident, regardless of where they live, would benefit by New Zealanders drinking less.

#### Sensitive sites

30. Alcohol Healthwatch **does not support** the lack of protections in the proposed LAP that are provided in section 77(1(b)) of the Sale and Supply of Alcohol Act 2012 ("location of licensed premises by reference to proximity to premises of a particular kind or kinds").
31. Alcohol Healthwatch believes that every Council should consider offering protection from new licences (of any type) opening in close proximity to a variety of sensitive sites, including but not limited to, early childhood centres, primary and secondary schools, playgrounds, parks and reserves, marae, health facilities, alcohol treatment centres, and places of worship.
32. We **recommend** that consideration be given to decisions on new licences intending to locate within at least 100m of sensitive sites. The Horowhenua District Council Provisional Local Alcohol Policy<sup>15</sup> prohibits the issue of new bottles stores within 100m of sensitive sites.
33. We would not support a 50m restriction (as evident in other local alcohol policies around the country) as our experience working with communities throughout New Zealand to support them in their licensing objections demonstrates that 50m is simply too restrictive. This approach usually means that the provision is only applied to sensitive sites that are directly next door or directly across the road. Sensitive sites that are slightly further away are neglected from this protection.
34. In reality, it is highly likely that exposure to the harms from the sale of alcohol extend to sensitive sites that are located beyond 100m from a licensed premises.



52-8

### On-licence hours

35. Of the mechanisms available in a LAP, restricting the trading hours of licensed premises is likely to have one of the greatest impacts on reducing harm.<sup>16,17</sup> This is because a consistent and strong body of high-quality evidence has demonstrated the impact of on-licence trading hours on alcohol-related harm.
36. Alcohol Healthwatch **generally supports** the maximum closing hour of 2am for on-licences in certain areas of Palmerston North and the earlier closing hour of 12am in other zones (as per the Palmerston North District Plan). We recognise that a 2am closing represents a restriction to current trading hours in Palmerston North City.
37. However, Alcohol Healthwatch **strongly recommends** that Council consider an *earlier closing hour of 1am* in the zones identified for a 2am closing in the LAP proposal.
38. Alcohol Healthwatch **recommends** a more nuanced approach in terms of which zones and licence types are permitted to close at a later hour than others.
39. Alcohol Healthwatch **recommends** that the later closing hour is limited to Tavern and Function Centre licences only, with restaurants, cafés, and other on-licence types closing at 12am.
40. Alcohol Healthwatch **recommends** that areas zoned *local business* are not included within the areas where a later closing hour is proposed. Many of the *local business* zones appear to be surrounded by residential areas and hence a later closing hour may create additional amenity issues for residents.
41. Alcohol Healthwatch **recommends** the inclusion of discretionary conditions for on-licences in the LAP. The Council should consider the inclusion of a one-way door policy to cover the last hour of on-licence trading in this section.
42. Alcohol Healthwatch **recommends** the inclusion of further discretionary conditions for on-licences in the LAP:
  - Prohibiting the sale of certain products;
  - No “shots” or straight spirits/liqueurs to be served during last hour of trading/after 12am;
  - Licensee responsibility for cleaning litter, vomit and broken glass within 50 metres of premises;
  - Restricting use of outdoor areas for drinking and dining after specified hour;
  - Use of adequate CCTV coverage of specified areas; and
  - Use of adequate lighting around entrances and exits.

### Off-licences

43. As shown the Palmerston North Local Alcohol Policy Research Report, there appears to have been an increasing trend towards the purchase of alcohol from off-licence premises in the Manawatu area. A minority of alcohol sold is consumed at on-licensed premises or at licensed events, where some form of supervision, control, and host responsibility is required. This pattern is consistent with national-level (and international) trends.
44. As such, evidence-based strategies to minimise the harm from off-licence availability are essential and desirable, and can make a meaningful difference to the well-being of local residents.

52-9

*Trading hours*

45. Alcohol Healthwatch **does not support** the proposed off-licence trading hours of 7am to 10pm, though we do acknowledge the proposed closing hour is one hour earlier than the national default maximum trading hours.
46. For reasons listed below, we **recommend** maximum trading hours for off-licences be 10am to 9pm. We are also recommending these hours to all of the 67 Territorial Authorities in New Zealand.
47. New Zealand research has shown that the purchase of alcohol from an off-licence premise after 10pm was approximately twice as likely to be made by heavier drinkers.<sup>18</sup> We believe that there is no reason to believe that a 9pm closing hour won't offer further protection. International research has also demonstrated significant reductions in alcohol-related hospital admissions (particularly among adolescents and young adults) when off-licence hours are restricted.<sup>19,20</sup>
48. The decision by the Alcohol Regulatory and Licensing Authority (ARLA) on Auckland Council's Provisional Local Alcohol Policy ([2017] NZARLA PH 247-254) includes reference to a 9pm closing hour. In their decision, the Authority did not consider that the closing hour restriction of 9pm was unreasonable in light of the object of the Act (see paragraph 146).<sup>21</sup>
49. Furthermore, in the ARLA decision pertaining to Dunedin Council's Provisional Local Alcohol Policy ([2016] NZARLA PH 21 – 26), it was stated<sup>22</sup>:  

*“Consistent with the policy nature of a PLAP, a respondent is entitled to trial a local control where it considers that control will respond to a local problem. Where it can be shown that a proposed control may have a positive effect locally, the Authority will be reluctant to dismiss that policy.”*
50. For these reasons, we **strongly recommend** a closing hour of 9pm be trialled across the region and actively monitored.
51. In regards to the early opening hour of 7am, we believe it is not unreasonable to require an off-licence premises to open after 10am. The purpose of the LAP is to minimise harm; one of the ways this can be addressed is through reducing the exposure of alcohol (and its advertising) to children on their journey from home to school.
52. Research has documented the association between exposure to alcohol advertising around schools and intentions to use alcohol among very young adolescents.<sup>23</sup> Exposure to in-store displays of alcohol may also predict an increased probability of drinking.<sup>24</sup> Existing and new outlets will pose a risk in relation to exposure to alcohol advertising.
53. Protecting the current generation (particularly vulnerable groups such as children) from harm can greatly assist in minimising future harm from alcohol use in the communities of Palmerston North.
54. Furthermore, a later opening hour will restrict the accessibility of alcohol to those with an alcohol dependence. Social service providers in New Zealand have previously described the negative impact of early opening hours on persons with alcohol dependence.
55. Alcohol Healthwatch believes that there are many more positive benefits accrued from a later opening hour when compared to any loss of profits from the off-licence sector. Furthermore, economic imperatives regarding the chosen elements included in a LAP (e.g. justifying early opening hours using economic reasons) are not permitted.<sup>25</sup>

52-10

*Proximity of new licences to existing licences*

56. Alcohol Healthwatch **recommends** that no new off-licences be issued within close proximity of an existing off-licence premises. Examples of restricting off-licences by proximity can be found in the Canadian cities of Calgary (restricting new outlets within 300 metres of existing outlets), and Edmonton (bylaw stipulating a minimum distance of 500 metres between alcohol outlets).<sup>26,27</sup>

*Issue of new licences*

57. Alcohol Healthwatch **recommends** consideration is given to imposing a cap on the number of off-licence bottle stores permitted in areas of high socioeconomic deprivation (areas with NZDep deciles 8,9,10). There is an accumulating body of evidence showing that off-licences are associated with greater levels of harm in deprived areas compared to least deprived areas.<sup>28-32</sup> As described previously, Māori and Pacific young males (15-24 years) have been found to be more negatively impacted by living close to alcohol outlets.<sup>10</sup>
58. The neighbouring Horowhenua District Council Provisional Local Alcohol Policy<sup>15</sup> imposes a cap on the total number of off-licence bottle and grocery store premises in each town or township in the district. Similarly, many adopted local alcohol policies around the country impose caps on new licences, particularly off-licences.

*Discretionary conditions*

59. Alcohol Healthwatch **recommends** the inclusion of discretionary conditions relating to off-licences in the LAP.
60. Alcohol Healthwatch **recommends** including a discretionary condition to control the amount of alcohol advertising that is visible within 500m from schools and early childhood facilities. For example, off-licences that are permitted to override the sensitive site restrictions in the Gisborne LAP must have no external display of alcohol advertising.<sup>33</sup> From November 12, 2019, Ireland no longer permits alcohol advertising within 200m of schools, crèches, or council playgrounds.<sup>34</sup> Palmerston North City could follow the leadership shown in Ireland and require (in the local alcohol policy) a similar provision to apply to licensed premises.
61. Alcohol Healthwatch further **recommends** provisions that restrict the sale of single alcoholic beverages (single sales). Restrictions on single sales can greatly assist compliance with liquor bans throughout the region and may reduce pre-loading or side-loading surrounding licensed premises.
62. Research has documented the association between single sales and alcohol-related violence and crime.<sup>35</sup> Furthermore, an intervention to reduce single sales was found to reduce rates of alcohol-related ambulance attendances among 15 to 24 year olds.<sup>36</sup>
63. Single units of alcohol are likely to be favoured by those who are heavy drinkers and also price sensitive; namely adolescents and young adults, and those with an alcohol dependence. Many licensees in New Zealand have already signed an undertaking not to offer for sale any single alcoholic beverages from their premises. Some off-licences do already include conditions prohibiting single sales. For example, the Auckland District Licensing Committee<sup>37</sup> imposed a condition on a licence that no single sales of:
- i. Beer or ready to drink spirits (RTDs) in bottles, cans, or containers of less than 440mls in volume may occur except for craft beer; and

52-11

ii. *Shots or pre mixed shots.*

64. We see no reason why this provision cannot be included as a discretionary condition within the proposed Local Alcohol Policy.
65. Other discretionary conditions that could be considered for off-licence premises are:
- No sales to persons wearing school uniform
  - RTDs will not be displayed at the principal entrance to the store, or within 3 metres of the front windows
  - External advertising of the premises or alcohol brands/products to be minimised. Advertising limited to one sign identifying the trading name of the premises. Windows to be clear and free from brand advertising and no portable signage such as flags or sandwich boards.

### Club licences

66. Club licences, in particular those held by sports clubs, have been shown in research to contribute to the risky drinking behaviours among participants at the club.<sup>38</sup>
67. In addition, club licence density in New Zealand has been shown to be significantly associated with higher levels of violence and a range of alcohol-related offences.<sup>39,40</sup> In New Zealand, the effects of club density on violence are shown to be stronger in areas with low populations (e.g. rural areas).<sup>40</sup> Analysis of Pasifika youth drinking patterns in New Zealand found that participation in a sports team or club outside of school was independently associated with increased risk of binge drinking.<sup>41</sup>
68. Alcohol Healthwatch **supports** the proposed cease of trading of 12am for club licences, Monday to Sunday.
69. However, Alcohol Healthwatch **recommends** that the earliest trading hour for club licences be 10am, Monday to Sunday.
70. Our view, supported by strong research, is that club licences pose a risk for alcohol-related harm and should be subject to the same licensing controls and requirements as on-licences for which the primary revenue is not the sale of alcohol, e.g. restaurants.
71. Club licences have fewer obligations than on-licences, as they are afforded some leniency under the Act. For this reason, club licences should not have the same privileges as on-licence taverns, without operating under the same conditions as these premises. Clubs seeking a level playing field with taverns should seek a tavern licence.
72. Alcohol Healthwatch **recommends** a discretionary condition for club licences that requires a qualified manager on duty when alcohol is being sold and supplied during higher-risk periods.

### Special licences

73. Alcohol Healthwatch **recommends** that maximum trading hours for special licences be specified in the LAP. We recommend a 3am limit on trading hours for special licences.
74. Alcohol Healthwatch **recommends** the inclusion and use of discretionary conditions for special licences.



52-12

75. Alcohol Healthwatch **recommends** where an event with over 1000 attendees (or as otherwise considered appropriate) is taking place, an Event Alcohol Risk Management Plan is required as a discretionary condition.
76. Alcohol Healthwatch **recommends** discretionary conditions be included to restrict the number of alcoholic beverages supplied to one patron, and restrictions on certain types of drinking vessels.
77. Alcohol Healthwatch **recommends** discretionary conditions be included to clearly define and cordon off the licensed area designated for the sale, supply, and consumption of alcohol, with respect to outside events.

### Monitoring, Evaluation, and Review

78. Alcohol Healthwatch **supports** the Council's signalled intention to review the LAP two years after its adoption.
79. Alcohol Healthwatch **recommends** the Council develop a monitoring and evaluation plan. A range of indicators could provide measures for assessing the success or otherwise of the policy in achieving its objectives.
80. We suggest including a broad range of indicators in a monitoring and evaluation plan, e.g.:
  - a. number/rate of alcohol-related police events (e.g. drunk custodies, breach of liquor ban, late night assaults, drink-drive offences);
  - b. alcohol-related Emergency Department presentations, wholly-alcohol attributable hospitalisations, ambulance pick up data;
  - c. Crash-analysis data (single, night time vehicle crashes);
  - d. Alcohol consumption data (annual New Zealand Health Survey)
  - e. Feedback from community members and local enforcement agencies (licensing inspectors, Medical Officer of Health, and Police).
81. Alcohol Healthwatch also **recommends** a cautious approach to interpreting monitoring and evaluation data. Changes in reporting practices around alcohol-related Emergency Department presentations, for example, could indicate a higher number of presentations due to more consistent data collection practices. Some indicators may require a longer lead time before harm reductions become detectable, for example alcohol-related chronic diseases may take a long time to show any change. However, some alcohol-related chronic diseases (e.g. gastritis) may be more responsive to short term changes in the regulation of licensed environments.

### Conclusion

82. Alcohol Healthwatch **strongly believes** that the current levels of drinking in the region warrant a more restrictive approach being taken in the proposed Draft LAP. Evidence-based measures are available to reduce harm to the local residents, and we believe the Council has a duty to use them. Reduced trading hours for all types of licences are strongly encouraged. We also encourage Council to consider additional controls on location of licensed premises, particularly off-licences.

52-13

## References

- 1 Palmerston North City Council. Local Alcohol Policy 2020 Research Report: Information in support of the development of the Palmerston North City Council Local Alcohol Policy. 2019 <https://www.pncc.govt.nz/media/3132239/lap-research-report-2019.pdf>.
- 2 Sale and Supply of Alcohol Act 2012. <http://www.legislation.govt.nz/act/public/2012/0120/latest/DLM3339333.html>.
- 3 Bonomo Y, Norman A, Biondo S, *et al*. The Australian drug harms ranking study. *J Psychopharmacol (Oxf)* 2019; 33: 759–68.
- 4 Nutt DJ, King LA, Phillips LD. Drug harms in the UK: a multicriteria decision analysis. *The Lancet* 2010; 376: 1558–1565.
- 5 Connor J, Kydd R, Rehm J, Shield K. Alcohol-attributable burden of disease and injury in New Zealand: 2004 and 2007. Research report commissioned by the Health Promotion Agency, 2013.
- 6 Ministry of Health. Tatau kahukura: Māori health chart book 2015. 2015 <https://www.health.govt.nz/publication/tatau-kahukura-maori-health-chart-book-2015-3rd-edition> (accessed Dec 11, 2019).
- 7 Ministry of Health. New Zealand Health Survey 2018/19: Annual Data Explorer. Wellington, N.Z.: Author, 20149 [https://minhealthnz.shinyapps.io/nz-health-survey-2018-19-annual-data-explorer/\\_w\\_61dc3b7d/\\_w\\_f8cb0efc#!/home](https://minhealthnz.shinyapps.io/nz-health-survey-2018-19-annual-data-explorer/_w_61dc3b7d/_w_f8cb0efc#!/home) (accessed Nov 27, 2019).
- 8 Connor J, Kydd R, MacLennan B, Shield K, Rehm J. Alcohol-attributable cancer deaths under 80 years of age in New Zealand. *Drug Alcohol Rev* 2017; 36: 415–423.
- 9 Connor J, Kydd R, Shield K, Rehm J. The burden of disease and injury attributable to alcohol in New Zealanders under 80 years of age: marked disparities by ethnicity and sex. *N Z Med J* 2015; 128: 15–28.
- 10 Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. *Health Place* 2014; 29: 186–99.
- 11 Chambers T, Stanley J, Signal L, *et al*. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol Alcohol* 2018; 53: 626–633.
- 12 Health Promotion Agency. Trends in affordability of alcohol in New Zealand. 2018.
- 13 Massey University. Healthspace: Alcohol-related harm. 2018. [http://www.healthspace.ac.nz/maps/maps\\_Alcohol.html](http://www.healthspace.ac.nz/maps/maps_Alcohol.html).
- 14 Connor J, Casswell S. Alcohol-related harm to others in New Zealand: evidence of the burden and gaps in knowledge. *N Z Med J* 2012; 125: 11–27.
- 15 Horowhenua District Council. Horowhenua District Council Provisional Local Alcohol Policy. Levin, 2017 <https://www.horowhenua.govt.nz/files/assets/public/consultation/draftlap/hdc-provisional-local-alcohol-policy.pdf> (accessed Dec 13, 2019).
- 16 Babor T, Caetano R, Casswell S, *et al*. Alcohol: No ordinary commodity: Research and public policy. Oxford: Oxford University Press, 2010.
- 17 Sanchez-Ramirez DC, Voaklander D. The impact of policies regulating alcohol trading hours and days on specific alcohol-related harms: a systematic review. *Inj Prev* 2018; 24: 94–100.
- 18 Casswell S, Huckle T, Wall M, Yeh LC. International alcohol control study: pricing data and hours of purchase predict heavier drinking. *Alcohol Clin Exp Res* 2014; 38: 1425–31.
- 19 Wicki M, Gmel G. Hospital admission rates for alcoholic intoxication after policy changes in the canton of Geneva, Switzerland. *Drug Alcohol Depend* 2011; 118: 209–15.
- 20 Marcus J, Siedler T. Reducing binge drinking? The effect of a ban on late-night off-premise alcohol sales on alcohol-related hospital stays in Germany. *J Public Econ* 3; 123: 55–77.
- 21 Alcohol and Regulatory Licensing Authority. Decision: Auckland Council Provisional Local Alcohol Policy. Redwood Corporation *et al* vs Auckland Council. Wellington, New Zealand: Author, 2017 <https://ourauckland.aucklandcouncil.govt.nz/media/13606/the-alcohol-regulatory-and-licensing-authority-decision.pdf> (accessed Aug 5, 2019).

52-14

- 22 Alcohol and Regulatory Licensing Authority. Decision on Dunedin City Council's Provisional Local Alcohol Policy (appeals). Foodstuffs et al vs Dunedin City Council. 2017 [https://forms.justice.govt.nz/search/Documents/ARLA/arla\\_DECN\\_118352573/ARLA\\_FULL.pdf](https://forms.justice.govt.nz/search/Documents/ARLA/arla_DECN_118352573/ARLA_FULL.pdf) (accessed Aug 5, 2019).
- 23 Pasch KE, Komro KA, Perry CL, Hearst MO, Farbaksh K. Outdoor alcohol advertising near schools: what does it advertise and how is it related to intentions and use of alcohol among young adolescents? *J Stud Alcohol Drugs* 2007; 68: 587–96.
- 24 Collins RL, Ellickson PL, McCaffrey D, Hambarsoomians K. Early adolescent exposure to alcohol advertising and its relationship to underage drinking. *J Adolesc Health* 2007; 40: 527–534.
- 25 Alcohol and Regulatory Licensing Authority. B & M Entertainment Ltd., Capital and Coast District Health Board, Foodstuffs North Island Ltd., Wellington Inner City Residents and Business Association Inc., Medical Officer of Health, New Zealand Police, Progressive Enterprises Ltd., Super Liquor Holdings Ltd. versus Wellington City Council. [2015] NZARLA PH 21-28. Wellington, New Zealand: Alcohol and Regulatory Licensing Authority, 2015.
- 26 City of Calgary. City of Calgary Land Use Bylaw. 2018. <http://lub.calgary.ca/>.
- 27 City of Edmonton. Edmonton Zoning Bylaw. Section 85. Major Alcohol Sales and Minor Alcohol Sales. [https://webdocs.edmonton.ca/InfraPlan/zoningbylaw/bylaw\\_12800.htm](https://webdocs.edmonton.ca/InfraPlan/zoningbylaw/bylaw_12800.htm).
- 28 Livingston M. A longitudinal analysis of alcohol outlet density and assault. *Alcohol Clin Exp Res* 2008; 32: 1074–1079.
- 29 Karriker-Jaffe KJ, Ohlsson H, Kendler KS, Cook WK, Sundquist K. Alcohol availability and onset and recurrence of alcohol use disorder: Examination in a longitudinal cohort with co-sibling analysis. *Alcohol Clin Exp Res* 2018.
- 30 Pridemore WA, Grubestic TH. Community organization moderates the effect of alcohol outlet density on violence. *Br J Sociol* 2012; 63: 680–703.
- 31 Mair C, Gruenewald PJ, Ponicki WR, Remer L. Varying impacts of alcohol outlet densities on violent assaults: explaining differences across neighborhoods. *J Stud Alcohol Drugs* 2013; 74: 50–8.
- 32 Pridemore WA, Grubestic TH. A spatial analysis of the moderating effects of land use on the association between alcohol outlet density and violence in urban areas. *Drug Alcohol Rev* 2012; 31: 385–93.
- 33 Gisborne District Council. Gisborne Local Alcohol Policy, Section 3.1.1. 2018 <http://www.gdc.govt.nz/gisborne-district-local-alcohol-policy/> (accessed Aug 5, 2019).
- 34 Oireachtas. Public Health (Alcohol) Act 2018. 2018 <http://www.irishstatutebook.ie/eli/2018/act/24/enacted/en/html> (accessed Aug 6, 2019).
- 35 Parker RN, McCaffree KJ, Skiles D. The impact of retail practices on violence: the case of single serve alcohol beverage containers. *Drug Alcohol Rev* 2011; 30: 496–504.
- 36 Masho SW, Bishop DL, Edmonds T, Farrell AD. Using surveillance data to inform community action: the effect of alcohol sale restrictions on intentional injury-related ambulance pickups. *Prev Sci* 2014; 15: 22–30.
- 37 Auckland District Licensing Authority. Crown Liquor Clendon Wines, see [2018] ADLC 8220013176 April 9th 2018. 2018.
- 38 O'Brien, K K. Commentary on Terry-McElrath & O'Malley (2011): Bad sport—exorcizing harmful substances and other problems. *Addiction* 2011; 106: 1866–1867.
- 39 Cameron MP, Cochrane W, Gordon C, Livingston M. The locally-specific impacts of alcohol outlet density in the North Island of New Zealand, 2006-2011. Wellington: Health Promotion Agency, 2013.
- 40 Cameron, M.P., Cochrane, W., Livingston, M. The relationship between alcohol outlets and harms: A spatial panel analysis for New Zealand, 2007-2014. 2016.
- 41 Teevale T, Robinson E, Duffy S, et al. Binge drinking and alcohol-related behaviours amongst Pacific youth: a national survey of secondary school students. *N Z Med J Online* 2012; 125.

52-15

## Factsheet: hazardous drinking

New Zealand Health Survey 2018/19



# 20.0%

of New Zealanders had a hazardous drinking pattern. This equates to 787,000 adults aged 15+ years.

Males (27.5%) were more likely to drink hazarously than females (12.8%).



### MORE\* LIKELY TO DRINK HAZARDOUSLY

- ↑ Males were 2.1 times more likely than females
- ↑ Māori males were 1.4 times more likely than non-Māori males
- ↑ Māori females were 2.1 times more likely than non-Māori females
- ↑ NZers living in the most deprived neighbourhoods were 1.2 times more likely than those in the least deprived

### LESS\* LIKELY TO DRINK HAZARDOUSLY

- ↓ Asian males were 73% less likely and Asian females 87% less likely than non-Asian males and females

\* significant at  $p < 0.05$

### Prevalence of hazardous drinking, 2018/19

As shown below, hazardous drinking is not confined to young adults. Among men, a high prevalence of hazardous drinking is evident among those aged 18 and over.

	Male	Female
<b>Total</b>	27.5	12.8
<b>Age group (years)</b>		
15-17	6.7	5.9
18-24	45.1	25.5
25-34	33.5	16.3
35-44	30.2	15.0
45-54	28.9	15.8
55-64	26.1	9.6
65-74	20.2	3.6
75+	7.4	1.5

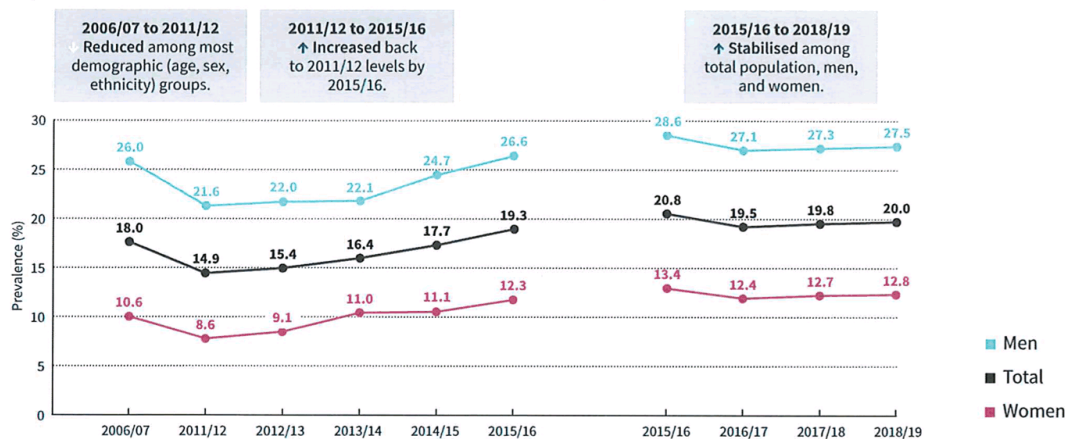
	Male	Female
<b>Ethnic group (total response)</b>		
Māori	40.0	27.1
Pacific	32.6	14.6
Asian	9.7	2.4
European/Other	29.8	13.5
<b>Neighbourhood deprivation</b>		
Quintile 1 (least deprived)	27.0	11.5
Quintile 2	25.2	11.1
Quintile 3	26.3	12.7
Quintile 4	28.1	11.8
Quintile 5 (most deprived)	31.6	17.1



## Trends over time

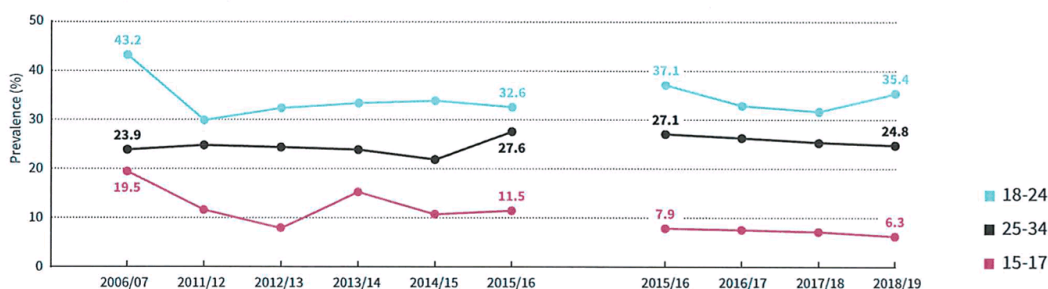
The figures below show the unadjusted prevalence of hazardous drinking over time (raw data can be found on the last page). In the total New Zealand adult population, hazardous drinking significantly declined between 2006/07 and 2011/12, significantly increased until 2015/16, and then stabilised thereafter.

Note that the survey methodology changed in 2015/16. The first (left) section of the graph refers to a period whereby a 'drink' was not defined. The second (right) section (2015/16 through to 2018/19) refers to the survey whereby a 'drink' referred to a standard drink (10g of alcohol). Prior to 2011/12, the surveys were conducted every five years.



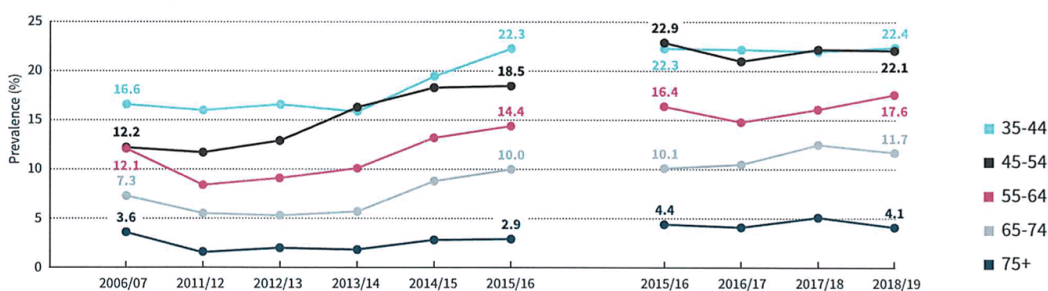
### a) By age, 15 to 34 years

Among 15-17 and 18-24 year olds, hazardous drinking significantly decreased between 2006/07 and 2011/12, and then stabilised thereafter. Among those aged 25-34 years, there was no change between 2006/07 and 2014/15, followed by a significant increase between 2014/15 and 2015/16.



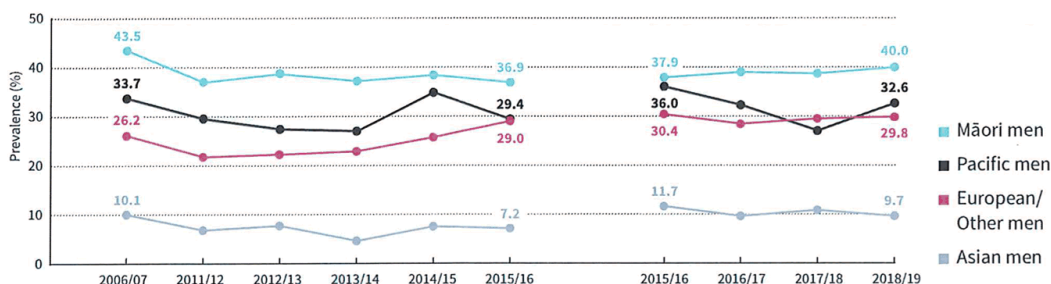
### b) By age, 35 years and over

Hazardous drinking significantly increased in many age groups between 2011/12 and 2015/16; e.g. among 35-44 years (16.0% to 22.3%), 45-54 years (11.7% to 18.5%), 55-64 years (8.4% to 14.4%), and 65-74 years (5.5% to 10.0%). Hazardous drinking prevalence stabilised from 2015/16 onwards.



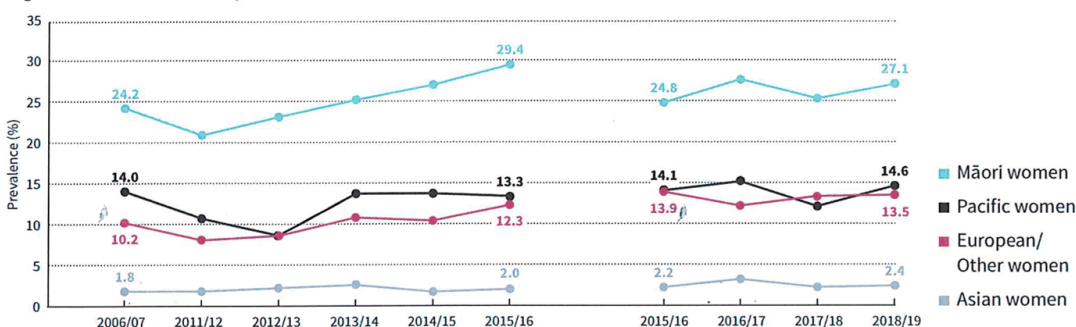
## c) By ethnicity, men

Hazardous drinking decreased between 2006/07 and 2011/12. Following this, prevalence stabilised among many groups but significantly increased among European/other men between 2011/12 and 2015/16.



## d) By ethnicity, women

Hazardous drinking decreased between 2006/07 and 2011/12 and then increased markedly among Māori women until 2015/16. Significant increases in this period were also evident among European/other women.



## Note to the reader

This factsheet has been prepared by Alcohol Healthwatch. For brevity, 95% Confidence Intervals are not reported. All prevalence data is unadjusted. Results of subgroup comparisons are adjusted. Before testing for differences between survey years, results are age-standardised to take into account changing age structures in the underlying populations over time. Respondents who reported more than one ethnic group are counted once in each group they reported.

## About the New Zealand Health Survey

The annual New Zealand Health survey is funded by the Ministry of Health and is designed to yield an annual sample size of approximately 14,000 adults aged 15 years and over. The results represent the sample selected for the period July 2018 to end of June 2019.

The survey data is collected in the respondents' homes, with the interviewer entering responses directly into a laptop computer and/or asking the respondent to complete a section of the interview by themselves using the laptop computer. In 2018/19, the response rate was 80%; 13,752 adults took part in the survey. The prevalence of hazardous drinking was determined by the proportion of respondents scoring 8 or more on the 10-question Alcohol Use Disorders Identification Test (AUDIT).

All data is available at [minhealthnz.shinyapps.io/nz-health-survey-2018-19-annual-data-explorer/\\_w\\_61dc3b7d/\\_w\\_5d35bad2/#!/home](https://minhealthnz.shinyapps.io/nz-health-survey-2018-19-annual-data-explorer/_w_61dc3b7d/_w_5d35bad2/#!/home)



## 52-18 Prevalence (%) of hazardous drinking, 2006/07 to 2018/19 NZ Health Surveys

Prevalence (%) over comparable years							Prevalence (%) over comparable years			
	2006/07	2011/12	2012/13	2013/14	2014/15	2015/16	2015/16	2016/17	2017/18	2018/19
<b>Total</b>	18.0	14.9 <sup>06</sup>	15.4 <sup>06</sup>	16.4 <sup>06</sup>	17.7 <sup>11</sup>	19.3 <sup>11</sup>	20.8	19.5	19.8	20.0
<b>Men</b>	26.0	21.6 <sup>06</sup>	22.0	22.1	24.7	26.6 <sup>11</sup>	28.6	27.1	27.3	27.5
<b>Women</b>	10.6	8.6 <sup>06</sup>	9.1	11.0	11.1 <sup>11</sup>	12.3 <sup>11</sup>	13.4	12.4	12.7	12.8
<b>Age group</b>										
15-17	19.5	11.7	8.0	15.3	10.8 <sup>06</sup>	11.5 <sup>06</sup>	7.9	7.6	7.2	6.3
18-24	43.2	29.9	32.4	33.4	33.9 <sup>06</sup>	32.6 <sup>06</sup>	37.1	32.9	31.7	35.4
25-34	23.9	24.8	24.4	23.9	21.9	27.6 <sup>14</sup>	27.1	26.3	25.3	24.8
35-44	16.6	16.0	16.6	15.9	19.5 <sup>11,13</sup>	22.3 <sup>06,11</sup>	22.3	22.2	22.0	22.4
45-54	12.2	11.7	12.9	16.3	18.3 <sup>06,11</sup>	18.5 <sup>06,11</sup>	22.9	21.0	22.2	22.1
55-64	12.1	8.4	9.1	10.1	13.2 <sup>11,13</sup>	14.4 <sup>11</sup>	16.4	14.8	16.1	17.6
65-74	7.3	5.5	5.3	5.7	8.8 <sup>11,13</sup>	10.0 <sup>06,11</sup>	10.1	10.5	12.5	11.7
75+	3.6	1.6	2.0	1.8	2.8	2.9	4.4	4.1	5.1	4.1
<b>Ethnic group</b>										
Total Māori	33.5	28.6 <sup>06</sup>	30.6	30.9	32.4 <sup>11</sup>	32.9 <sup>11</sup>	31.1	33.0	31.7	33.2
Māori men	43.5	37.1	38.8	37.2	38.4	36.9	37.9	39.0	38.7	40.0
Māori women	24.2	20.9	23.1	25.2	27.0 <sup>06,11</sup>	29.4 <sup>06,11</sup>	24.8	27.6	25.3	27.1
Total Pacific	23.4	19.3	17.2	20.1	23.4	21.1	23.5	23.4	19.1	22.7
Pacific men	33.7	29.6	27.4	27.0	34.8	29.4	36.0	32.3	27.0	32.6
Pacific women	14.0	10.7	8.6	13.7	13.7	13.3	14.1	15.2	12.1	14.6
Total Asian	5.7	4.2	5.1	3.7	4.7	4.7	7.2	6.6	6.5	6.2
Asian men	10.1	6.9	7.8	4.7	7.6	7.2	11.7	9.7	10.9	9.7
Asian women	1.8	1.8	2.2	2.6	1.7	2.0	2.2	3.2	2.2	2.4
Total Euro/Other	17.9	14.8	15.2	16.7	17.9 <sup>11</sup>	20.4 <sup>06,11,14</sup>	21.8	20.0	21.2	21.3
Euro/Other men	26.2	21.8	22.3	22.9	25.7	29.0 <sup>11,14</sup>	30.4	28.4	29.5	29.8
Euro/Other women	10.2	8.1	8.6	10.8	10.4 <sup>11</sup>	12.3 <sup>11</sup>	13.9	12.2	13.3	13.5
<b>Neighbourhood deprivation (1=low, 5=high)</b>										
Quintile 1 men	24.9	16.5	17.7	18.0	20.7	24.2	24.7	23.5	23.9	27.0
Quintile 2 men	22.4	21.8	22.2	19.6	21.0	27.5	25.0	21.1	29.0	25.2
Quintile 3 men	25.9	20.3	19.9	24.5	25.4	24.6	29.5	29.8	29.1	26.3
Quintile 4 men	27.2	25.7	24.5	22.7	28.2	27.1	30.5	30.2	36.6	28.1
Quintile 5 men	30.1	24.8	26.8	26.1	29.1	30.1	34.3	31.4	27.8	31.6
Quintile 1 women	9.0	3.9	5.6	7.1	6.7	7.6	13.6	9.5	8.8	11.5
Quintile 2 women	8.8	7.4	7.0	9.5	8.7	13.3	9.6	9.7	9.8	11.1
Quintile 3 women	9.4	8.2	8.5	11.8	8.8	9.7	13.9	13.8	14.2	12.7
Quintile 4 women	10.3	11.3	9.5	10.4	13.7	15.0	13.7	13.4	14.7	11.8
Quintile 5 women	15.8	12.2	15.1	16.6	17.5	15.8	16.1	15.5	15.9	17.1

06 significantly lower than in 2006/07

06 significantly higher than in 2006/07

12 significantly higher than in 2012/13

13 significantly higher than in 2013/14

11 significantly higher than in 2011/12

14 significantly higher than in 2014/15

Only known significant changes are shown. Differences in the prevalence over time by level of deprivation are not examined.



## Submission Form

### Draft Local Alcohol Policy 2020

PAGE 1 OF 2

#### Your contact details

Full Name: JOHN - DARRAGH PATTHEWS

Organisation (if applicable): BREW UNIONS LIMITED

Postal Address: \_\_\_\_\_

Phone (day): \_\_\_\_\_

Email: \_\_\_\_\_

Please note, as required by legislation, your submission (including contact details provided on the submission form), will be available to the public and media and on the Council website as part of the decision-making process unless you request that these details be kept private. If you wish to keep your contact details confidential, please tick this box. ☒

Submissions hearings are planned for February or March 2020.

Do you want to speak to the Council in support of your submission? (please tick) ☐ Yes ☒ No

#### Making your submission

You can find details about the draft Local Alcohol Policy along with the reasons for making those proposals in the Statement of Proposal. We have also prepared a research report which informs our proposals and may be useful for you in making your submission. Both of these documents can be found on our website [pncc.govt.nz/alcoholpolicy](http://pncc.govt.nz/alcoholpolicy).

#### Appeals

We strongly encourage anyone with an interest in this draft policy to make a submission to secure the right of appeal. At the end of the consultation process, there will be an opportunity to appeal the Council's final decision. However, this right of appeal is only available to those people who make a formal submission on the draft policy (i.e. this process).

#### Issuing further licences

A Local Alcohol Policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is **not proposing to include restrictions on whether to issue further licences.**

☐ I support this ☒ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

I support the Council NOT placing Restrictions.

This Councils LHP is sufficient and no changes

need to be made.

ORIGINAL TO FOR ACTION AND REPLY		
RECD	13 DEC 2019	PNCC
COPY TO		
1. _____		
2. _____		

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**



53-2

**Trading hours**

The Local Alcohol Policy can set maximum trading hours that are different from the national maximum trading hours.

The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

☐ I support this ☒ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

THE CURRENT LAP IS SUFFICIENT, NO CHANGES NEED  
TO BE MADE.

**Location**

A Local Alcohol Policy can include restrictions on where new licensed premises can be located.

The Council is not proposing to include any location restrictions in the draft Local Alcohol Policy.

☐ I support this ☒ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

THE CURRENT LAP IS SUFFICIENT.

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

53-3



## Submission Form

### Draft Local Alcohol Policy 2020

PAGE 2 OF 2

#### One-way door restrictions

A Local Alcohol Policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time.

**The Council is not proposing to include a mandatory one-way door restriction.**

☐ I support this ☒ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

There is no need to change the current LAP.

#### Discretionary conditions

The Local Alcohol Policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted.

**The Council has not included any discretionary conditions in the draft Local Policy.**

☐ I support this ☒ I oppose this ☐ I don't know/no opinion

Please provide any comments below:

There is no need to change the current LAP.

**SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019**

| Local Alcohol Policy 2020 25

53-4

**Other comments**

Do you have any other comments or suggestions to make?

☐ I support this    ☐ I oppose this    ☐ I don't know/no opinion

Please provide any comments below:

The current L.A.P. is sufficient.

**Please send your submission:**

By mail: Draft Local Alcohol Policy 2020 Submissions,  
Governance Team, Palmerston North City Council, Private Bag 11034, Palmerston North 4442

\* In person: Palmerston North City Council Customer Services Centre, 32 The Square, Palmerston North \*

By email: [submission@pncc.govt.nz](mailto:submission@pncc.govt.nz) (write Draft Local Alcohol Policy 2020 Submissions in the subject line)

By phone: 06 356 8199

SUBMISSIONS CLOSE 4PM, FRIDAY 13 DECEMBER 2019

54-1

**Your contact details**

Full name

Tim Adlam

Organisation

The Speights Ale House Palmerston North

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

54-2

I oppose this as this includes some of our major function centres in Palmerston North. We will not get functions coming to Palmerston North. Customers will be more limited within the Manawatu where they will want to hold their functions, this will have an ongoing effect for all add on industries who look after visitors such as motel owners etc as functions may end up being promoted and moved away from Manawatu due to limited options to pick from for a later close time

Having a shorter function time limit of 12am could encourage customers to drink more/quicker in shorter space of time

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

55-1

5

**Your contact details**

Full name

Lourie Family

Organisation

Orlando Country

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I don't know/no opinion

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

SS-2

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I don't know/no opinion

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

To Whom it may concern:

As owners of the Orlando Country 'Conference & Events Venue' situated at 748 Rangitikei Line, PN we feel the restrictions proposed in the new draft local alcohol policy, although possibly beneficial to reducing alcohol harm within the areas targeted, will have negative impact on our business and possibly others associated within the industry... and if so hopefully there will be submissions from parties or their representatives in relation to any "indirect impact".

We don't believe the draft plan has intentionally included Orlando and therefore request consideration for a request to be excluded from the Draft Plan in respect of the closing times.

Last year we made a submission on the proposed Draft Local Alcohol Policy for 10:30pm closing and mentioned the range of negative flow-on effects the policies would have and

55-3

although the updated proposal is for 12:00am, again we feel this would be restrictive for reasons we have outlined below in this submission for which we would very much appreciate some consideration.

Firstly, we would like to ensure that as a business defending ourselves from possible effects of the proposed DLAP, we should not be deemed self-serving and attempting to defend our current alcohol sales, as although alcohol is a very important aspect of our business it is only a fraction of our annual income, and is to us considered a very 'positive accompaniment' which enhance our main events that include social occasions with teambuilding, food, activities and meetings which make up over 80% of our business.

It should also be noted that a good portion of Orlando events are product launches, business networking and award functions, some of which have very limited alcohol consumption and are more focused on a 'guest speaker' with wines to dinner tables following the canapes and drinks we host on the driving range.

Based on the above overview, we would like to think that any restriction to the 'Orlando' trading hours to "reduce harm" is an 'unintentional' consequence of the councilors attempt at putting together the draft local alcohol policy as we would like to think that Orlando, although not perfect, is possibly very close to an ideal solution rather than part of the problem and although there will always be exceptions we would like to think that in most cases we would be a safer option than town disregarding whether alcohol has been consumed by our guests or not.

Unfortunately the 12:00am closing would have what we would consider to be an unintentional impact on our business, as the local and out of town corporates/conference clients that we currently market our business to and ultimately host at the venue would in our opinion be either nervous of or not interested in booking a venue with these restrictions to work around especially with so many possibilities in the likes of Hawkes Bay which has a fantastic reputation along with great venues.

We currently recommend a finish time of no later than 11:00pm to 11:30pm to our clients in their itinerary's, although at present we are receptive to allowing an extension to midnight if required as a piece of mind for the event organiser, although in reality the events would very rarely run past 11:00pm or 11:30pm.

With the above in mind, it is our opinion that '1:00am' would be a reasonable time for us to have the confidence to market events within the region. This would also we feel, eliminate any negative discussion that may eventuate around restrictive options and the ability of event venues within our region to meet the needs of clients.

The above 1:00am time would allow us to continue concluding our events around 11:00pm to 11:30pm and ensure the safe egress from the venue over the following '1 hour' with Taxis, busses and private transport taking guests to Hotels, home and into the city.



55-4

Bring this forward an hour and you will have a much higher proportion requesting the city as a drop-off as is most likely too early to head to bed.

Although we do understand that alcohol harm is the focus of this draft, a business like ours is in our opinion "host responsible". This is due to the overall theme of our venue being so broad with alcohol available as an accompaniment to a social or business occasion rather than the focus, which we feel is very much in line with the requirements of our licence and in our opinion, "how we should be socialising".

An argument against our submission may well be that the resulting transfer of events to the city centre enables better or concentrated control of venues, therefore reducing the likelihood of alcohol harm etc, but we think the point is missed, as our business would be unlikely to contribute to the problem, with our clientele more likely to be negatively affected or harmed by the current "unsociable behaviour" experienced within the city should they be forced to relocate to continue.

Given a choice around employee safety and responsibilities, we would imagine employers of conference delegates would most likely prefer their staff to stay on longer at our venue with organised transport than have them wandering the streets in the city. Certainly we would expect a parent to be more comfortable having their family members at Orlando rather than in Broadway at 11:30pm.

We are confident the proposed policy is unintentionally including our business within its boundaries and that based on the above information would like consideration to be given to ensuring we are allowed to continue to operate as we currently do.

We also appreciate that some form of separation of zoning may create issues, but would hope that there would be no implementation of the current 12:00am policy until a satisfactory outcome excluding Orlando is in place.

This may well be a simple case of looking at the possibility of re-zoning our venue which would also allow for the policy to be more targeted and "appropriate", but would also be in keeping with the spirit in which our particular resource consent was applied for, accepted and in place when the boundaries were adjusted to transfer our business from Manawatu District to the PNC

Thank you for your consideration

Regards

The Lourie Family

56-1

**Your contact details**

Full name  
Jules Grace

Organisation

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

56-2

I have not seen any evidence to support a reduction in opening hours reducing alcohol related harm. The issues that are brought up anecdotally in the industry as well as purported in the media generally revolve around the issue of pre-loading. There is an alcohol ban area inside the central city which is not actively policed (which might help). Moving forward licensing hours will in my opinion, make pre loading happen quicker, and move more alcohol fueled incidents away from areas where it can be monitored and/or policed and into residential/private areas where there is more risk of harm to those involved/bystanders etc. The council's own city reputation survey provides some interesting insights into the lack of inner city vibrancy/late night environment whilst the LAP Research Report shows Palmerston North in a very positive light compared to nearly every other centre in the country.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?  
Not at this stage

57-1

**Your contact details**

Full name

Gail Campbell

Organisation

Albert Sports Bar

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

True

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

57-2

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

I have been in this industry for 20+ years now and don't agree with the closing hours being brought forward. There have been significant changes in my time and each change has been detrimental to the hospitality industries bars and taverns. Drinking habits are changing and due to pricing and drink driving a lot of people are buying cheap from the supermarkets and bottle stores and drinking at home then after a few will head into town as they want to continue socializing. By bringing the closing time an hour earlier will not solve any problems. In fact during the trial period I am of the understanding security had just as many issues but earlier. Just don't think it will work.

58-1

**Your contact details**

Full name  
Hailey Clark

Organisation

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

58-2

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

59-1

**Your contact details**

Full name

Matthew Ferrell

Organisation

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:



59-2

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

60-1

**Your contact details**

Full name

Joanne McBeth

Organisation

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

60-2

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

61-1

**Your contact details**

Full name

Murray Cleghorn

Organisation

Brew Union Brewing Co

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

Restricting licences results in an anti competitive retail space and minimises opportunity for hospitality innovators to enhance the cities hospitality landscape.

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

61-2

Please provide any comments below:

Note: I am co-owner of Brew Union (and the soon to open Libre). At BU we currently typically trade well withing the proposed hours, however there are occassions where we have functions or events that could run later. "Special licence" applications are slow, onerous and expensive (just ask anyone that wanted to watch the cricket world cup in a licenced premise). I believe the proposed hours reduction impacts our and other F&B operators.

1-I don't see the "harm reduction" in reducing trading hours. Did the six oclock swill promote harm reduction and healthy drinking?

2- Commentary/annecdotes regards "pre loading" are not addressed by reducing on premise trading hours

3- Where is the evidence of significant public demand to reduce licenced premise trading hours?

4- Many destinations in not in the business/inductrial zone, which host conferences and large gatherings (e.g. Awapuni, Orlando) will be pushing patrons out the door very early. I believe this will not only limit their ability to attract bookings in the future (and impact Palmerston Norths visitor nights as a result).

5- The 2am Closing trial in 2017 resulted in an increase in reported issues in around the CBD licenced premises according evidence shared with the Alcohol Liason meeting by local bar operators and security providers. The police failed to share data from this period.

Closing later allows patrons to filter out of licenced premises at a steadier rate, as opposed to a flood of patrons on the street at once.

If Plamerston North wants to be percieved as a cosmopolitan city it needs a level of worldliness with its trading hours.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

61-3

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

I'd like to understand the harm that is wanting be reduced.

I firmly believe effective promotion and policing of the inner city LIQOUR BAN AREA would do significantly more to make the inner city a safer and more welcoming environment than any trading hours reductions. Todate there has been next to no policing of the LIQOUR BAN AREA (minuted in Alcohol Liason Meetings throughout 2019), with large numbers of young people drinking from cars on the street in the CBD. There is next to no effective signage and no enforcement.

Licencees provide and maintain a safe evironment for patrons to enjoy a social lubricant. I wager any patron would feel safer inside Brew Union Brewing Co at 2:30 am than on Broadway or King Street.

62-1

**Your contact details**

Full name

Reuben Takarua

Organisation

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

True

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I don't know/no opinion

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:



62-2

There was an experimental 2am closing in the past. The result was an exponential increase in violence and intoxication for the 6 months it was implemented.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I don't know/no opinion

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

This has been tried as an experiment and it provides a headache to door staff because of the amount of extra conflict that the security staff have to contend with.

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?



63-1

### Your contact details

Full name

Toshiko Knight (on behalf of Palmerston North Safety Advisory Board)

Organisation

Palmerston North Safety Advisory Board

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

### Hearings

Do you want to speak to the Council in support of your submission?

Yes

### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

The PNSAB supports the decision to not restrict the number of licenses issued.

### Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this

63-2

Please provide any comments below:

The PNSAB generally supports these changes to trading hours.

It is recognised that the need for changes to alcohol accessibility is better tackled through a process of evolution, rather than drastic revolution. The change in trading hours to close at 2am in the CBD and 12am in the outer suburbs and towns will likely see a reduction of revellers in town in the early hours of the morning.

The PNSAB supports the change in accessibility for off-licence premises such as supermarkets and bottleshops. The Wellington Health Promotion Agency report Alcohol Off-licence Purchases and Subsequent Harm discusses Wellington City Council's proposal to reduce off-licence trading hours, noting that "the earlier closing time may present one way of reducing the opportunity to consume excessive alcohol, as New Zealand evidence indicates that drinkers who purchase alcohol at later times are more likely to be heavy drinkers compared with those who purchase at earlier times"

Additionally, while it is acknowledged that restricting trading hours is an effective and cost-effective measure available to reduce alcohol-related harm (ARH) associated with licensed venues, we are concerned that this is a narrow solution to a wider societal issue that is not being adequately addressed.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

The Safety Advisory Board would like to add that the density of off-licence premises can contribute to Alcohol related harm. One New Zealand study found a relationship between off-licensed outlet density and violent events, whilst two international review

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I support this

Please provide any comments below:

Police representatives at our submission discussion meeting are of the understanding that many premises in the CBD already operate an informal one-way door restriction.

It is important to encourage other premises to be part of the existing informal arran

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

The Safety Advisory Board understands that some premises who operate outside the CBD may submit that the LAP restrictions will adversely affect their business operation. The SAB contends that any decision must balance business interests, public safety and public good.

The SAB strongly supports the principle of a two-year review process for the LAP, and encourages Council to work towards implementing a greater number and breadth of alcohol harm reduction initiatives, including evidence to inform subsequent reviews of the LAP.

The SAB would like to see more collective leadership to gather evidence for driving effective change that can inform future policy and demonstrate leadership in achieving a safe drinking culture for everyone in Palmerston North.

64-1

**Your contact details**

Full name

Victoria Pluck

Organisation

The Brewers Apprentice

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

True

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

64-2

this will affect my job as it will mean that i wont get long hours of work and it means i wouldn't be able to go out for a drink after work as all the places would be closed

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I oppose this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

65-1

**Your contact details**

Full name

anna southee

Organisation

Brewers apprentice

Postal address

Phone

Email

n

If you wish to keep your contact details confidential, please tick this box.

True

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

65-2

I work night shifts, I would like to drink after work, this would mean that my hours will get cut back with a restriction.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I oppose this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

66-1

**Your contact details**

Full name  
tegan hardy

Organisation  
Brewers aparrentice

Postal address

Phone

Email

n

If you wish to keep your contact details confidential, please tick this box.  
True

**Hearings**

Do you want to speak to the Council in support of your submission?  
No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:



66-2

I work night shifts i would like to socialize with my work colleagues after work. This would also mean that i would lose out on hours meaning my hours would drop and my income.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I oppose this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

67-1.

**Your contact details**

Full name  
Oliver Tong

Organisation  
Brewers parrentice

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.  
True

**Hearings**

Do you want to speak to the Council in support of your submission?  
No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

67-2

I oppose this because this restriction would cut my hours as I work bar shifts late night. This would also inhibit me from going out and enjoying my time after work as I finish late at night.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I oppose this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

68-1

**Your contact details**

Full name  
samuel smits

Organisation  
Brewers Apprentice

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.  
True

**Hearings**

Do you want to speak to the Council in support of your submission?  
No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

68-2

i believe intox levels went up and so did fighting last time there was a restriction as people pre load to get more out of their night and drink quicker when out as the closing time is sooner.

also there will be a huge loss in revenue for local businesses and people who rely on the hours will also loose out.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I oppose this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

69-1

## Your contact details

Full name

GARY WILLIAM WRIGHT

## Organisation

The Fish Bar Ltd

Postal address

1. *Introduction*

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

## Hearings

**Do you want to speak to the Council in support of your submission?**

Yes

### Issuing further licences

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

## Trading hours

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

69-2

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I support this

Please provide any comments below:

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I support this

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I support this

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

As speaking as an owner of two businesses registered seperatley, our primary concern are the employment of staff in relation to job security and their future when we have been the guinea pig in the past at our financial loss. Nobody seems concerned with this so i would like to know what solutions are being offered to avoid losses for business and staff. Also have many more questions which will be happy to present when having a say thanks,

Gary Wright

70-1

**Your contact details**

Full name

GARY WILLIAM WRIGHT

Organisation

P R ATTRACTIONS LTD (BUBBLES BAR)

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:



70-2

This will have an impact on our business and the future employment of staff

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

We have voluntry tried earlier closing before, resulting in thousands of dollars revenue decreasing. What right does anyone have to determine our financial future and if so please provide a proposal for how the business and its staff will be compensated for loss of earnings or employment.

Five years ago our council where so quick to jump on Sydneys earlier closing as an example and wanted to follow suit, well that failed and created a ghost town with many losing jobs and the whole town suffered financial losses, this has now been aknowledged and addmitted they got it wrong and is now going back to a 3.30 am licence in some cases. How will the committee look at this ?

I have many suggestions so will look forward to having a say thanks.

71-1

**Your contact details**

Full name

Colleen Frances Maxwell

Organisation

Masonic Hotel

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

Yes

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

71-2

- \* creating a vibrant city gives flexibility to stay open to 3am
- \* 3am close give owner the flexibility to choose closing time depending on trade
- \* trialled 2am close in 2017 and it did not work for the purpose of reducing harm
- \* for off licence - customers have already purchased before 10pm so no impact
- \* huge negative effect to some businesses that are trading as event centres on the outskirts of town to close 12am

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I support this

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?  
I feel local bar operators, council, health and police have been working productively over the past 15 years to make Palmerston North a vibrant, safe city. Hopefully this will continue.

72-1

**Your contact details**

Full name

Tania Cowx

Organisation

Hockey Manawatu Inc

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I support this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I oppose this

Please provide any comments below:

72-2

Although the restriction does not affect our current licence conditions, we will be restricted in future if we want to host events after midnight. This will have a negative impact on us using our facility for events like birthdays, weddings and other celebrations.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.  
I support this

Please provide any comments below:

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.  
I support this

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.  
I oppose this

Please provide any comments below:

We would prefer to see some guidelines or principles that guide the discretion, without having a wide open discretion.

#### Other comments

Do you have any other comments or suggestions to make?

73-1

**Your contact details**

Full name  
Kim Penny

Organisation

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.  
☐ False

**Hearings**

Do you want to speak to the Council in support of your submission?  
☐ No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

☐ I oppose this

Please provide any comments below:

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

☐ I support this

Please provide any comments below:

73-2

**Location**

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

**One-way door restrictions**

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I oppose this

Please provide any comments below:

**Discretionary conditions**

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

**Other comments**

Do you have any other comments or suggestions to make?

74-1

**Your contact details**

Full name

John Faiz

Organisation

Legacy Centre

Postal address

Phone

Email

If you wish to keep your contact details confidential, please tick this box.

False

**Hearings**

Do you want to speak to the Council in support of your submission?

No

**Issuing further licences**

A local alcohol policy can include restrictions on whether to issue further licences, either generally or for certain types of alcohol licences. The Council is not proposing to restrict the number of licences issued.

I oppose this

Please provide any comments below:

I would like the council to restrict the number of alcohol licenses in our city. Alcohol is too available.

**Trading hours**

A local alcohol policy can set maximum trading hours that are different from the national maximum trading hours. The Council is proposing to set the maximum trading hours for on-licensed premises (such as bars, cafes and restaurants) in business and industrial zones to 8am to 2am the next day, for on-licensed premises in all other zones to 8am-12am the next day, for off-licensed premises (such as bottle stores and supermarkets) to 7am to 10pm, and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

I support this



74-2

Please provide any comments below:

I support reducing the hours alcohol is sold. I would support restricting alcohol being sold from bottle stores and supermarkets to 7pm.

#### Location

A local alcohol policy can include restrictions on where new licensed premises can be located. The Council is not proposing any location restrictions.

I oppose this

Please provide any comments below:

I would like to see no bottle stores in our low income communities. We have been hands on working with individuals and families in the Western Suburbs on Palmerston North for over 15 years now. Many of the sexual assaults, domestic violence incidents, the

#### One-way door restrictions

A local alcohol policy can impose a mandatory one-way door restriction on bars or taverns that would prevent people from entering the licensed premises after a certain time. The Council is not proposing a mandatory one-way door restriction.

I don't know/no opinion

Please provide any comments below:

#### Discretionary conditions

A local alcohol policy can include discretionary conditions, which the District Licensing Committee can choose to apply to a liquor licence when it is granted. The Council has not included any discretionary conditions in the draft policy.

I don't know/no opinion

Please provide any comments below:

#### Other comments

Do you have any other comments or suggestions to make?

Over 15 years working in our lowest income community with individuals and families I have seen first hand the horrific damage excessive alcohol consumption is causing. I am in favour of stronger regulations.



## PROCEDURE SHEET

### HEARING OF SUBMISSIONS

#### Presenting your submission

You have indicated a wish to present your submission in person before a committee of Councillors. You may speak to your submission yourself or, if you wish, arrange for some other person or persons to speak on your behalf.

We recommend that you speak to the main points of your submission and then answer any questions. It is not necessary to read your submission as Committee members have a copy and will have already read it.

Questions are for clarifying matters raised in submissions. Questions may only be asked by Committee members, unless the Chairperson gives permission.

#### Time Allocation

10 minutes (including question time) will be allocated for the hearing of each submission. If more than one person speaks to a submission, the time that is allocated to that submission will be shared between the speakers.

#### Who will be there?

The Community Development Committee will hear the submissions. The Committee comprises of elected members as identified on the frontispiece of the Agenda.

There will also be other people there who are presenting their submission. The Hearing is open to the media and the public.

#### Agenda

An Agenda for the meeting at which you will be speaking will be available on the PNCC website. The Agenda lists the submissions in the order they will be considered by the Committee, although there may be some variation to this.

#### Venue

The meeting will be held in the Council Chamber, First Floor, Civic Administration Building, The Square, Palmerston North.

The Council Chamber will be set out with tables arranged appropriately. You will be invited to sit at the table with the Councillors when called.

#### Tikanga Maori

You may speak to your submission in Maori if you wish. If you intend to do so, please contact us no later than four days before the date of the meeting (refer to the "Further Information" section below). This is to enable arrangements to be made for a certified interpreter to attend the meeting. You may bring your own interpreter if you wish.

Oasis # 13733642



**Visual Aids**

A whiteboard, and computer with PowerPoint will be available for your use.

**Final Consideration of Submissions**

Final consideration of submissions will be at the ordinary meeting of Community Development Committee on Wednesday 6 May 2020. The media and public can attend these meetings, but it will not be possible for you to speak further to your submission, or participate in the Committee or Council deliberations.

**Changes to this Procedure**

The Committee may, in its sole discretion, vary the procedure set out above if circumstances indicate that some other procedure would be more appropriate.

**Further Information**

If you have any questions about the procedure outlined above please contact Susie Williams-Dobson, Democracy & Governance Administrator, phone 06 356-8199 or email [susie.williams-dobson@pncc.govt.nz](mailto:susie.williams-dobson@pncc.govt.nz).

\* \* \* \* \*

Oasis # 13733642



# PALMERSTON NORTH CITY COUNCIL

## Minutes of the Community Development Committee Meeting Part I Public, held in the Council Chamber, First Floor, Civic Administration Building, 32 The Square, Palmerston North on 05 February 2020, commencing at 9.00am

**Members Present:** Councillor Lorna Johnson (in the Chair), The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Billy Meehan, Karen Naylor, Bruno Petrenas and Aleisha Rutherford.

**Non Members:** Councillors Vaughan Dennison and Tangi Utikere.

**Apologies:** Councillor Leonie Hapeta and Ms Danielle Harris.

### 1-20 Apologies

Moved Lorna Johnson, seconded Rachel Bowen.

#### The COMMITTEE RESOLVED

1. That the Committee receive the apologies.

Clause 1-20 above was carried 15 votes to 0, the voting being as follows:

#### For:

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

### 2-20 Notification of Additional Item

Moved Lorna Johnson, seconded Rachel Bowen.

#### The COMMITTEE NOTED

1. That the Report to be considered on Pages 11-13 of the Agenda would be replaced by the Report entitled 'Final Report on Fees for Service Contracts 2016-2019' that had been circulated as an Additional Item. The reason for this replacement was to correct inaccuracies, and to provide more information than that contained in the original Report.

Clause 2-20 above was carried 15 votes to 0, the voting being as follows:

#### For:

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

**3-20**

**Public Participation at Meetings**

Memorandum, presented by Natalya Kushnirenko, Democracy & Governance Administrator.

Moved Lorna Johnson, seconded Rachel Bowen.

The **COMMITTEE RESOLVED**

1. That the Community Development Committee set aside a public comment section of not more than 30 minutes at the commencement of each ordinary meeting of the Committee to provide members of the community the opportunity to comment.

Clause 3-20 above was carried 15 votes to 0, the voting being as follows:

**For:**

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

**4-20**

**Public Comment**

Public comment was received from Mr James Beard regarding cooperation with Manawatu District Council over cycleways.

Moved Lorna Johnson, seconded Rachel Bowen.

The **COMMITTEE RESOLVED**

1. That the public comment be received for information.

Clause 4-20 above was carried 15 votes to 0, the voting being as follows:

**For:**

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

**5-20**

**Final Report on Fees for Service Contracts 2016-2019**

Memorandum, presented by Joann Ransom - Community Development Manager.

During discussion Elected Members raised questions relating to reporting on strategic priority grants and requested an additional recommendation to formalise reporting.

Moved Rachel Bowen, seconded Lorna Johnson.

The **COMMITTEE RESOLVED**

1. That the report entitled 'Final Report on Fees for Service Contracts 2016-2019' be received for information.
2. That the Chief Executive be instructed to provide a mid-term and final

report on Strategic Priority Grant Funding issues and opportunities for the 2019-2022 term of Council.

Clause 5-20 above was carried 15 votes to 0, the voting being as follows:

**For:**

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

**6-20 Neighbourhoods, Villages & Rural Portfolio Update (January 2020)**

Memorandum, presented by Councillor Bruno Petrenas.

Moved Bruno Petrenas, seconded Aleisha Rutherford.

The **COMMITTEE RESOLVED**

1. That the Neighbourhood Villages and Rural Portfolio update report for January 2020 be received for information.

Clause 6-20 above was carried 15 votes to 0, the voting being as follows:

**For:**

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

**7-20 Safe City Portfolio Update (January 2020)**

Memorandum, presented by Councillor Patrick Handcock.

Moved Patrick Handcock ONZM, seconded Tangi Utikere.

The **COMMITTEE RESOLVED**

1. That the Safe City Portfolio update report for January 2020 be received for information.

Clause 7-20 above was carried 15 votes to 0, the voting being as follows:

**For:**

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

**8-20 Health & Wellbeing Portfolio Update (January 2020)**

Memorandum, presented by Councillor Bruno Petrenas (Acting for Councillor Billy Meehan).

Moved Billy Meehan, seconded Brent Barrett.

The **COMMITTEE RESOLVED**

1. That the Health & Wellbeing Portfolio update report for January 2020 be received for information.

Clause 8-20 above was carried 15 votes to 0, the voting being as follows:

**For:**

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

**9-20**

**People & Community Portfolio Update (October 2019 - January 2020)**

Memorandum, presented by Councillor Lorna Johnson.

During discussion Elected Members were of the opinion that due consideration should be given to supporting partnerships with diverse communities to deliver events, thereby encouraging inclusion in the wider community and consistency with Council direction.

Moved Lorna Johnson, seconded Rachel Bowen.

The **COMMITTEE RESOLVED**

1. That the People & Community update report for October to January 2020 be received for information.

Clause 9.1 above was carried 15 votes to 0, the voting being as follows:

**For:**

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

Moved Brent Barrett, seconded Lew Findlay QSM.

The **COMMITTEE RESOLVED**

2. That the Chief Executive ensures appropriate programmes and budgets are included in the draft annual plan process to support the continued partnerships with diverse communities to deliver new and emerging diverse community events such as Diwali in the Square.

Clause 9.2 above was carried 9 votes to 6, the voting being as follows:

**For:**

Councillors Brent Barrett, Rachel Bowen, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Lorna Johnson, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

**Against:**

The Mayor (Grant Smith) and Councillors Susan Baty, Vaughan Dennison, Patrick Handcock ONZM, Billy Meehan and Karen Naylor.

**10-20**

**Work Schedule**

Moved Lorna Johnson, seconded Rachel Bowen.

The **COMMITTEE RESOLVED**

1. That the Community Development Committee receive its Work Schedule



dated February 2020.

Clause 10-20 above was carried 15 votes to 0, the voting being as follows:

**For:**

The Mayor (Grant Smith) and Councillors Brent Barrett, Susan Baty, Rachel Bowen, Zulfiqar Butt, Vaughan Dennison, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Lorna Johnson, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Tangi Utikere.

The meeting finished at 10.10am.

Confirmed 25 February 2020

**Chairperson**

UNCONFIRMED

UNCONFIRMED

## MEMORANDUM

**TO:** Community Development Committee

**MEETING DATE:** 25 February 2020

**TITLE:** Draft Local Alcohol Policy 2020 - Summary of Submissions

**PRESENTED BY:** Julie Macdonald, Strategy & Policy Manager

**APPROVED BY:** Sheryl Bryant, General Manager - Strategy & Planning

---

### RECOMMENDATION(S) TO COMMUNITY DEVELOPMENT COMMITTEE

1. That the Draft Local Alcohol Policy 2020 summary of submissions is received.
- 

#### 1. ISSUE

The Council carried out public consultation on the draft Local Alcohol Policy and is holding hearings for those people who indicated that they wished to speak to their submissions. The purpose of this memo is to provide a brief summary of the consultation process and the number of submissions received. A more detailed summary and analysis of the written and oral submissions will be prepared for the May meeting of the Community Development Committee.

#### 2. BACKGROUND

On 2 September 2019 the Community Development Committee approved the draft Local Alcohol Policy for public consultation. That consultation took place between 26 October and 13 November 2019. The Council received 73 written submissions during the consultation period. Twenty submitters have indicated that they want to speak to the Council about their submissions.

An online submission form was provided for submitters (with a printed version also available at consultation sessions). This form asked submitters to indicate if they supported or opposed each of the five key policy elements. Submitters could also choose "don't know/no opinion". Of the 73 submissions received, 63 made use of this online/printed form, and answered the provided questions. The remaining submitters provided a free-form submission and did not follow the supplied format.

## PALMERSTON NORTH CITY COUNCIL

The following table shows the number of submitters who supported/opposed each of the five key policy elements:

	Don't restrict issuing further licences	Restrict trading hours	Don't restrict location	Don't impose one-way door policy	Don't impose discretionary conditions
Support	40 (55%)	14 (19%)	37 (50%)	36 (49%)	37 (51%)
Oppose	14 (19%)	49 (67%)	13 (18%)	21 (29%)	12 (16%)
Don't know/no opinion	9 (12%)	0	13 (18%)	6 (8%)	14 (19%)
No answer (free-form submission)	10 (14%)				

### 3. NEXT STEPS

A full summary and analysis of the issues raised by submitters will be provided to the Committee at the May meeting. This analysis will also include a suggested response to the issues raised by submitters, along with any recommended changes to the draft Local Alcohol Policy.

### 4. COMPLIANCE AND ADMINISTRATION

Does the Committee have delegated authority to decide? If Yes quote relevant clause(s) from Delegations Manual. Clause 169	<b>Yes</b>
Are the decisions significant?	<b>No</b>
If they are significant do they affect land or a body of water?	<b>No</b>
Can this decision only be made through a 10 Year Plan?	<b>No</b>
Does this decision require consultation through the Special Consultative procedure?	<b>No</b>
Is there funding in the current Annual Plan for these actions?	<b>Yes</b>
Are the recommendations inconsistent with any of Council's policies or plans?	<b>No</b>
The recommendations contribute to Goal 3: A Connected and Safe Community	
The recommendations contribute to the outcomes of the Connected Community Strategy	

The recommendations contribute to the achievement of action/actions in the Safe Community Plan

The action is: Develop a Local Alcohol Policy (by end of 2020/2021)

Contribution to strategic direction and to social, economic, environmental and cultural well-being

The Council has specifically identified the development of a local alcohol policy as an action under the Safe Community Plan. The draft LAP is focussed on minimising the harm caused by excessive or inappropriate consumption of alcohol, which contributes to building a city where people feel safe and are safe.

#### **ATTACHMENTS**

Nil