

PALMERSTON NORTH CITY COUNCIL

AGENDA

**EXTRAORDINARY COMMUNITY
DEVELOPMENT COMMITTEE**

9.00AM, THURSDAY 10 DECEMBER 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

Billy Meehan

Karen Naylor

Bruno Petrenas

Aleisha Rutherford

Danielle Harris

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

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 | E info@pncc.govt.nz | P 356 8199

Private Bag 11034, 32 The Square, Palmerston North



EXTRAORDINARY COMMUNITY DEVELOPMENT COMMITTEE MEETING

10 December 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 Thursday, 10 December 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. Hearing of Submissions - Draft Local Alcohol Policy 2020

Page 7

6. Confirmation of Minutes

Page 137

"That the minutes of the Community Development Committee meeting of 4 November 2020 Part I Public be confirmed as a true and correct record."

7. Draft Local Alcohol Policy - Summary of Submissions

Page 145

Memorandum, presented by Julie Macdonald - Strategy and 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: 10 December 2020

TITLE: Hearing of Submissions - Draft Local Alcohol Policy 2020



RECOMMENDATION(S) TO COMMUNITY DEVELOPMENT COMMITTEE

1. That the Community Development 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

Submission No.	Submitter	Page No.
20	New Zealand Police Manawatu	56
25	MidCentral District Health Board's Public Health Service	98
21	Te Hiringa Hauora Health Promotion Agency	74
27	Fish Bar Ltd	103
28	Celtic Inn	105
29	PR Attractions Ltd (Bubbles Bar)	107
23	Foodstuffs North Island Limited	84
22	General Distributors Limited	80
30	Alcohol Healthwatch	109
14	Hospitality New Zealand Palmerston North Branch	38

ATTACHMENTS

1. Submissions [↓](#) 
2. Procedure Sheet [↓](#) 

Draft Local Alcohol Policy Submissions 2020

Subm No	Submitter / Organisation Represented	Contact
1	Bruce Thomson	
2	Sophie Penn	
3	Natasha Napier	
4	Jenny Olsson	
5	Margie	
6	Denis Jenkins	
7	Sam Kilmister	
8	Kamal Guron	
9	Jessica McCrae	
10	Stefan Charsley	
11	Rhiannon Wimsett	
12	Niki Burtenshaw	
13	Kim Penny	
14	Hospitality New Zealand PN	Adam Parker
15	Evelyn Strugnell	
16	Erika Herbst	
17	Karl Pearce	
18	Jeff Mabbett	St John Ambulance
19	Let the Children Live, Wesley Broadway Methodist Church	Audrey Jarvis
20	NZ Police Manawatu	Inspector Ross Grantham, Prevention Manager Manawatu
21	Te Hiringa Hauora Health Promotion Agency	Cathy Bruce, Principal Advisor Local Government
22	General Distributors Limited	Lauren Eaton, Senior Associate
23	Foodstuffs North Island Limited	Olivia Taylor, Legal Counsel
24	Cancer Society of New Zealand Manawatu Centre Inc	Kerry Hocquard, Community Health Advocate
25	Public Health Services, MidCentral District Health Board	Dr Rob Weir, Medical Officer of Health

Draft Local Alcohol Policy Submissions 2020

Subm No	Submitter / Organisation Represented	Contact
26	Albert Sports Bar	Gail Campbell
27	Fish Bar Ltd	Gary Wright
28	Celtic Inn	Gary Wright
29	PR Attractions Ltd (Bubbles Bar)	Gary Wright
30	Alcohol Healthwatch Trust	Nathan Cowie, Health Promotion Advisor
31	Masonic Hotel	Colleen Maxwell
32	Ray Alcock	
33	Crystelle Jones	

Merle Lavin

1-1

146 59286

From:
Subject:

Submission
FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name
Bruce Thomson

Name of the organisation you represent
-

Privacy

Withhold my contact details
False

Hearings

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

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.
I oppose this

Please provide any comments below:

Further restrictions could further help reduce the harmful consequences of alcohol, just as happened with tobacco.

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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:

All the trading of alcohol brings ill health and impaired judgment leading to social harm, including injuries and death. Obviously the alcohol culture is popular, but the health culture is growing now, through education and community understanding. I oppose any trading hours, for those reasons, just as I oppose the sale of tobacco.

1-2

Location

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

Please provide any comments below

The Council bears responsibility for community health and well being locally. Alcohol is so toxic that drinking alcoholic drinks intoxicates and sickens people, damaging liver, vascular and brain health. Council's duty is to deny applications by vendors of alcohol except for controlled industrial or medical uses such as as a solvent - for machine cleaning and killing bacteria.

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.
I support this

Please provide any comments below:

For best community health, the restriction needs to apply at one millisecond after a person is born, applied retrospectively for non-neonates.

Discretionary conditions

The Council has not included any discretionary conditions in the draft policy.
I oppose this

Please provide any comments below:

IF Council encounters unexpected circumstances where greater reduction of use of alcohol is possible, or increased education to reduce use of alcohol is obstructed by the Policy, then Council needs to be able to respond to reduce consumption of alcohol.

Other comments

Do you have any other comments or suggestions to make?

- In 1969, the NZ Health Department used to hand out free packs of cigarettes, labelled Health Department, to patients at Porirua mental hospital, probably with strong incentives from the tobacco industry. - We have all become aware of the harm of tobacco, and have reduced it, greatly improving public health, as well as the economic well being of families. - Similarly we are progressing past drinking this toxic, often habituating and addictive solvent. Please progress the education of the public so the community discontinues drinking it.

Merle Lavin

2-1

146 59286

From:
Subject:

Submission
FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name
Sophie Penn

Name of the organisation you represent

Privacy

Withhold my contact details
True

Hearings

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

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.
I support this

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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:

See time error on supermarket/liquor store sale times (9am rather than 9pm). I agree to the changing of trading hours for on-license premises but oppose those for off-license and club-license

Location

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

2-2

Please provide any comments below

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I oppose this

Please provide any comments below:

There are various reasons why someone may exit a premises and want to re enter - as example escorting a friend to a safe ride home so they don't have to wait on the street alone and then reentering the premises previously occupied.

Discretionary conditions

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

3-1

14664486

From:
Subject:

Submission
FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name
Natasha Napier

Name of the organisation you represent

Privacy

Withhold my contact details
True

Hearings

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

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.
I don't know/no opinion

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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:

Just oppose the off-license 9pm proposal. There's nothing wrong with current policy and changing may encourage people to bulk buy.

Location

The Council is not proposing to include any location restrictions in the Local Alcohol Policy.
I don't know/no opinion

3-2

Please provide any comments below

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I don't know/no opinion

Please provide any comments below:

Discretionary conditions

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

4-1

14663992

From:
Subject:

Submission
FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name

Jenny Olsson

Name of the organisation you represent

Privacy

Withhold my contact details

False

Hearings

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

No

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.

I support this

Please provide any comments below:

I would like to see a regulation limiting any alcohol outlet to be at least a kilometre from the next closest outlet except for the CBD

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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

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

I oppose this

4-2

Please provide any comments below

I would like to see a regulation limiting any alcohol outlet to be at least a kilometre from the next closest outlet except for the CBD

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

Discretionary conditions

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?

From: Submission
Subject: FW: Alcohol Policy

Sent: Friday, 11 September 2020 9:49 am
To: Submission <submission@pncc.govt.nz>
Subject: Alcohol Policy

Kia ora

I've received a phone call from Margie. She wishes me to pass on her thoughts on alcohol issues in Palmerston North.

Margie has been clean for 29 years now so has first-hand knowledge of the destruction that alcohol causes.

- Half a glass of wine destroys brain cells
- One glass of beer destroys brain cells
- Alcohol destroys relationships and finances
- People don't understand the seriousness of the harm that alcohol causes as it is considered socially acceptable
- She would like to see all pubs closed
- Alcohol causes mental issues and sexual immorality
- Alcohol is a drug and is a stepping stone to other drugs

6-1

14664996

Merle Lavin**From:**

Submission

Subject:

FW: Draft Local Alcohol Policy 2020 submission

Your contact details**Full name**

Denis Jenkins

Name of the organisation you represent

Massey University

Privacy**Withhold my contact details**

True

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

No

Issuing further licences**The Council is not proposing to include restrictions on whether to issue further licences.**

I support this

Please provide any comments below:

There does not appear to be an oversupply of licenced premises and even then market forces will control this.

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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:

The need for a 3am closure for On licensed taverns, bars, hotels and restaurants, allows for social interaction for shift workers. This is an adequate social window and should not be extended. The 1 am closing for all other On licences is adequate for the style of service and vent being provided in these premises. The same applies to Clubs closing at 12am which often are within residential areas. The off licences trading hours should read 7am to 9pm.

Location

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

I oppose this

Please provide any comments below

Licensed premises location and proximity to other facilities should be taken into account for all new applications. Examples would be the proximity to child care facilities, primary and intermediate schools. However competition and close proximity to other licensed premises should not be a consideration.

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I support this

Please provide any comments below:

This prevents bar hopping and allows the staff to have complete control of the reducing numbers of late night drinkers. The successful daily closure of the premises is greatly aided by this policy.

Discretionary conditions

The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

Discretionary conditions allow for a case by case approach to new applications and renewals. This is a good performance control on licencing and should be included.

Other comments

Do you have any other comments or suggestions to make?

The DLA should take recognition of the demographic of its population when creating policy, so that the social enjoyment of the community is not hindered by restrictive policies. This particularly relates to the student body, the armed forces personnel and the various shift workers in PNs workforce.

7-1

146 5756 4

Merle Lavin**From:**

Submission

Subject:

FW: Draft Local Alcohol Policy 2020 submission

Your contact details**Full name**

Sam Kilmister

Name of the organisation you represent**Privacy****Withhold my contact details**

True

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

No

Issuing further licences**The Council is not proposing to include restrictions on whether to issue further licences.**

I don't know/no opinion

Please provide any comments below:**Trading hours**

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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****The Council is not proposing to include any location restrictions in the Local Alcohol Policy.**

I don't know/no opinion

Please provide any comments below

7-2

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.
I oppose this

Please provide any comments below:

Discretionary conditions

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?

8-1

14664487

Merle Lavin**From:**

Submission

Subject:

FW: Draft Local Alcohol Policy 2020 submission

Your contact details**Full name**

Kamal Guron

Name of the organisation you represent**Privacy****Withhold my contact details**

True

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

No

Issuing further licences**The Council is not proposing to include restrictions on whether to issue further licences.**

I don't know/no opinion

Please provide any comments below:**Trading hours**

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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****The Council is not proposing to include any location restrictions in the Local Alcohol Policy.**

I don't know/no opinion

Please provide any comments below

8-2

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I oppose this

Please provide any comments below:

Discretionary conditions

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?

9-1

14663189

Merle Lavin**From:**

Submission

Subject:

FW: Draft Local Alcohol Policy 2020 submission

Your contact details**Full name**

Jessica McCrae

Name of the organisation you represent**Privacy****Withhold my contact details** ☒ True**Hearings****Do you want to speak to Council in support of your submission?**☒ No**Issuing further licences****The Council is not proposing to include restrictions on whether to issue further licences.**☒ I support this**Please provide any comments below:****Trading hours**

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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:**

Having shorter trading hours just leads to more shenanigans taking place in peoples homes and disturbing the wider city. We've had shorter trading hours before and it didn't work then, so why would it work now.

Location**The Council is not proposing to include any location restrictions in the Local Alcohol Policy.**☒ I support this

9-2

Please provide any comments below

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I oppose this

Please provide any comments below:

This is enforced by places at certain times anyway, why does it need to become something mandatory when bars etc. do it at their own discretion

Discretionary conditions

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?

10 - |

14665398

Merle Lavin**From:**
Subject:Submission
FW: Draft local alcohol policy submission**Your contact details****Full name**
Stefan Charsley**Organisation****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 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.

10-2

I oppose this

Please provide any comments below:

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 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.

11-1

14659587

Merle Lavin**From:**
Subject:Submission
FW: Draft Local Alcohol Policy 2020 submission**Your contact details****Full name**
Rhiannon Wimsett**Name of the organisation you represent****Privacy****Withhold my contact details**
True**Hearings****Do you want to speak to Council in support of your submission?**
No**Issuing further licences****The Council is not proposing to include restrictions on whether to issue further licences.**
I support this**Please provide any comments below:****Trading hours****The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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:**

No being able to purchase alcohol at certain times would be inconvenient for organisation purposes, i.e. if you are going away and want to get groceries organised before you leave.

Location**The Council is not proposing to include any location restrictions in the Local Alcohol Policy.**
I support this

11-2

Please provide any comments below

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I oppose this

Please provide any comments below:

To be honest I thought this was already a thing. A lot of places you go out will not let you in between 2am and 3am closing time. Seeing as there are already so many places that implement this, I personally feel it would be okay to leave this unchanged. If some businesses choose to let in customers during this time, they might decide this business is worth it.

Discretionary conditions

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?

12-1

14661995

Merle Lavin**From:**
Subject:Submission
FW: Draft Local Alcohol Policy 2020 submission**Your contact details****Full name**
Niki Burtenshaw**Name of the organisation you represent****Privacy****Withhold my contact details**
True**Hearings****Do you want to speak to Council in support of your submission?**
No**Issuing further licences****The Council is not proposing to include restrictions on whether to issue further licences.**
I oppose this**Please provide any comments below:****Trading hours****The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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 disagree on the maximum trading hours for all licenced premises. 3am is far too late to be still selling alcohol. It should be 1am. 10am for the next category and 8pm for e.g. bottle stores

Location**The Council is not proposing to include any location restrictions in the Local Alcohol Policy.**
I oppose this

12-2

Please provide any comments below

Too many bottle stores going into vulnerable communities

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I support this

Please provide any comments below:

Discretionary conditions

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?



Submission Form

Draft Local Alcohol Policy 2020

PAGE 1 OF 4

Your contact details

Full Name:

13-1
14669830
KIM PENNY

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 November 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.

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 9 OCTOBER 2020



Submission Form

Draft Local Alcohol Policy 2020

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Trading hours

13 - 2

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 some on-licensed premises (taverns/bars, hotels, and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm, 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 would like to see shorter hours, but can live with this.

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 9 OCTOBER 2020



Submission Form

Draft Local Alcohol Policy 2020

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One-way door restrictions

13 -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 proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

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

Please provide any comments below:

I would like to see this restriction come in earlier, but can live with this restriction.

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:

Seems pragmatic.

SUBMISSIONS CLOSE 4PM, FRIDAY 9 OCTOBER 2020



Submission Form

Draft Local Alcohol Policy 2020

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Other comments

Do you have any other comments or suggestions to make?

13-4

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

Please provide any comments below:

I appreciate that it is outside the scope of this proposal, but I would also like to note that I would support the drinking age being raised to 20, to support healthier relationships with alcohol.

Thanks for taking this seriously. It'll be great to see this on the books and monitor it from here.



To get your submission to us, either:



Mail to: Draft Local Alcohol Policy 2020 Submissions, Democracy & Governance,
Palmerston North City Council, Private Bag 11034, Palmerston North 4442



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



Email to: submission@pncc.govt.nz (write Draft Local Alcohol Policy 2020 Submissions in the subject)



Phone: 06 356 8199



Fax: 06 355 4115

**The submission period runs from 5 September 2020
until 4pm on Friday 9 October 2020**

14-1

14670822

Hospitality New Zealand Palmerston North Branch
representing Palmerston North City



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

CONTACT DETAILS:

Hospitality New Zealand

Contact: Adam Parker

Phone: 027 550 2558

Email: adam@hospitality.org.nz

www.hospitality.org.nz

14-2

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 81 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.

14-3

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. Whilst Hospitality New Zealand is in favour of the national default for on-license and off-license trading hours, the hours proposed in the revised Draft Local Alcohol Policy are more favourable to the Hospitality businesses in Palmerston North, and therefore we would tend to be in favour of the newly revised trading hours
6. Hospitality New Zealand recognise that there was discussion around the draft Local Alcohol Policy fails to recognise any legitimate reasoning or research for the proposal of a one-way door policy.

14-4

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 one-way door restrictions recommended.

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. However, we would like to point out that there does not appear to be a clear argument or any substantial research to justify why a one-way door policy would actually work in Palmerston North City. The only rationale provided is that some submitters appeared to be in favour of the one-way door policy. We believe that submitters were only in favour of a one-way door policy as an alternative suggestion to closing at 2am. In addition, we also believe that not all the submitters truly understand what is involved with a one-way door policy and what this would mean for their business.

One-way door policies

9. One-way door policies are a measure that has been tried repeatedly in overseas jurisdictions and in New Zealand over the previous 15 years. They have been largely rejected because they didn't work and were actually found to increase behavioural problems.
10. An extensive study into alcohol-related nightlife crime in Australia, Dealing with alcohol-related harm and the night-time economy, compared the effectiveness of alcohol-related crime prevention measures introduced between 2005 and 2010 in New South Wales and Victoria. The study, the largest of its kind in Australia, concluded there was no evidence to show that one-way door policies are effective in their own right. It also found that the policies had no long-term effect on assaults or violence. It did, however, find that the policy harmed smaller bars and venues that trade earlier.
11. A KPMG assessment of Melbourne's three-month one-way door trial (June 2008 to September 2008) found alcohol-related presentations as a proportion of total hospital emergency presentations on Friday and Saturday nights increased and continued during the temporary lockdown period. The policy was subsequently scrapped.
12. In 2006, an ABC documentary reported on the effectiveness of Brisbane's one-way door policy. It reported that it failed to reduce the number of assault victims admitted to the Royal Brisbane and Women's Hospital. Taxi drivers were interviewed as part of the report and they supported the view that the policy had failed to curb late night violence. Newcastle's one-way door policy has also been shown to be ineffective in reducing assaults. Professor Kypros Kypri, of the University of Newcastle, compared assault rates in the Newcastle CBD with those of the nearby suburb of Hamilton, which had not been subject to any restrictions. What he found was no significant reductions in assault rates. Respected Australian criminologist Professor Ross Homel of Griffith University has extensively researched one-way door policies. He emphatically told the Legislative Assembly of Queensland's Law, Justice and Safety

14-5

Committee that, "The 3am lockout is a complete, absolute, 100 per cent failure from all of the data that we have been able to observe... It is what I regard as a politically attractive but completely ineffective strategy."

13. Any one-way door policy will require additional staffing. Experience tells us that higher levels of enforcement will see a big rise in tension with people trying to get into bars after the nominated time, while those inside will stay and drink for as long as they possibly can due to no option of going to another venue. Our own experience, backed by international research, is that people who are not allowed into bars are likely to drink in public places, move to where there are no restrictions or party at home. This is supported by the experience in Christchurch when, following the 2011 earthquake and the subsequent shutdown of the central city bars and nightclubs, complaints about noisy parties in suburban areas nearly tripled. The Christchurch City Council received more than 15,000 noise complaints in the year to June 2012. Christchurch City Council's inspections and enforcement officer Gary Lennan said that during that period the number of complaints for parties also skyrocketed, with almost all coming from residential areas. "Party and band noise seem to be leading these increases and it is thought that the quakes have influenced this by reducing the number of official venues and bars, causing more celebrations to occur at private homes." (*Fairfax*, 2012)
14. An quantitative and qualitative evaluation report of the one-way door policy in Whangarei in 2015 concluded a statistically significant increase in anti-social behaviour upon the introduction of the one-way door policy. However, it's important to note that CitySafe patrols were also introduced at the same time and therefore the stats may simply be based on more observations of this type of behaviour. This could also be seen as confirmation or observational bias, but may still show evidence that a one-way door policy does not decrease this kind of anti-social behaviour.
15. In our anecdotal experience at Hospitality New Zealand, we have witnessed incidents where a one-way door policy has separated groups of friends on a night out. This has many implications for vulnerable individuals. Not only that, but the implementation of this policy is likely to create more disorder in the streets at 2am. When intoxicated people are turned away from bars at 2am after queuing, we can only imagine the unintended consequences.
16. As mentioned in our previous submission, Palmerston North is often described as "events city". Frequent large conferences are held at various centres close to and around the city. The inevitable issue will arise when all the people from an event or a conference try to get to the city before 2am. This is likely to be a complete disaster for public transport, taxi's, and ultimately, the authorities when the street is littered with intoxicated patrons with nowhere to go. The queues will result in increase aggression and likely create even more alcohol related violence than ever before.
17. Hospitality New Zealand strongly oppose the implementation of a one-way door restriction. However, we are in favour of the current status quo.

14-6

Summary of recommendations from Hospitality New Zealand

Based on experience in other locations of New Zealand Hospitality New Zealand recommends that the Councils consider the following initiatives in order to enhance the vibrancy and safety of Palmerston North at night and support a robust sustainable night-time economy

- Better public transport options at night
- Greater enforcement of liquor bans
- Greater Police presence

References

- Decon University (2012) Dealing with alcohol-related harm and the night-time Economy
- Fairfax (2012) Rowdy parties move to suburbs
- KPMG (2008) Evaluation of the Temporary Late-Night Entry Declaration
- Law, Justice and Safety Committee, Legislative Assembly of Queensland (2010) Inquiry into Alcohol-Related Violence – Final Rep

15-1

14669830

Merle Lavin**From:**

Submission

Subject:

FW: Draft Local Alcohol Policy 2020 submission

Your contact details**Full name**

Evelyn Strugnell

Name of the organisation you represent

Evelyn Strugnell

Privacy**Withhold my contact details**

False

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

No

Issuing further licences**The Council is not proposing to include restrictions on whether to issue further licences.**

I oppose this

Please provide any comments below:

We have too many alcoholics now. shorten the hours. Stop home and family Violence. and car accidents.

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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****The Council is not proposing to include any location restrictions in the Local Alcohol Policy.**

15-2

I support this

Please provide any comments below

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I support this

Please provide any comments below:

Discretionary conditions

The Council has not included any discretionary conditions in the draft policy.

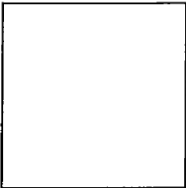
I support this

Please provide any comments below:

I am concerned about the violence and car accidents that alcohol causes.

Other comments

Do you have any other comments or suggestions to make?



16-1

14671439

Merle Lavin**From:**

Submission

Subject:

FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name

Erika Herbst

Name of the organisation you represent

Privacy

Withhold my contact details

True

Hearings

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

No

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.

I don't know/no opinion

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm; 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

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

I don't know/no opinion

Please provide any comments below

16-2

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I oppose this

Please provide any comments below:

Discretionary conditions

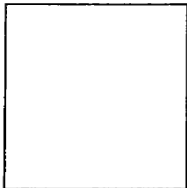
The Council has not included any discretionary conditions in the draft policy.

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

17-1

14700712

From:
Subject:

Submission
FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name
Karl Pearce

Name of the organisation you represent
Public

Privacy

Withhold my contact details
False

Hearings

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

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.
I don't know/no opinion

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm; 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 am opposed to the earlier closures of off license to 9pm also club licenses to 12am for the following reasons; Making stricter alcohol off license laws during a Covid Pandemic crises seems skeptical or mistrustful of the councils own citizens (as if they cant make their own decisions) and smacks of prohibition and seems somewhat hasty at this time. Most hard alcohol outlets don't open until 10am anyway and I believe only one closes at 11pm, all others close at 10pm and earlier. In some areas only 4 Squares and 'convenience stores' are in close or easy proximity (limited wine and beer) and most of them close 8 or 9pm anyway. This leaves only Supermarkets (wine and beer only) selling alcohol to a max time of 11pm currently. I think only one in the city sells alcohol to 11pm all rest close at 10pm I believe. I would like to see alcohol being sold in off licenses particularly supermarkets to 12 midnight and I would

17-2

like to see sports clubs and RSA's close at 1am next morning which will allow them to still be able to enter a bar before their 2am cut off if they wish.

Location

The Council is not proposing to include any location restrictions in the Local Alcohol Policy.
I don't know/no opinion

Please provide any comments below

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.
I support this

Please provide any comments below:

I've seen this work well in Rotorua and means a punter has to make a reasoned decision to leave a premises after 2am understanding that after they leave they cant enter another after 2am. The by-law gives bouncers/security a prescriptive by-law to point towards in being able to stop "rovers" into a bar or club after 2am.

Discretionary conditions

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?

By-laws continue to be made that per-supposes or assumes peoples working lives are 9 to 5, Monday to Friday is increasingly out dated and should reflect these changing employment lifestyles. Again, I would like to see alcohol being sold in off licenses particularly supermarkets to 12am midnight next day and I would like to see sports clubs and RSA's close at 1am next morning which will allow them to still be able to enter a bar before their 2am cut off if they wish. .

Merle Lavin

From: Submission
Subject: FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name
 Jeff Mabbett

Name of the organisation you represent
 St John Ambulance

Privacy

Withhold my contact details
 True

Hearings

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

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.
 I don't know/no opinion

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm; 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:

Reducing trading hours by one hour could have significant effect on the ambulance services response to incidents relating to alcohol consumption which is making our evening and night shifts extremely busy. Our workload is increasing with incident relating to harm, whether it be intoxication, or alcohol fuelled fights or domestic harm incidents. Workload on a Thurs-Saturday and even into Sunday nowadays in Palmerston North has an increasing percentage related to the consumption of alcohol. While not all this can be attributed to bars and clubs, we see a lot of people who have been into town and returning home or to friends places. We also see the harm pre-loading does, many people aren't even making it into town. If we can reduce the hours of operation by an hour we will hopefully get these people into town

earlier and perhaps less drinking with the price of purchasing drinks at bars (which is the reason for preloading).

Location

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

Please provide any comments below

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.
I support this

Please provide any comments below:

Discretionary conditions

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?

ORIGINAL TO
FOR ACTION AND REPLY

Submission Form

Draft Local Alcohol Policy 2020

PAGE 1 OF 4

RECD - 7 OCT 2020 PAGE

COPY TO

Your contact details

Full Name:

(Dr) Audrey Winifred Jarvis

Organisation (if applicable):

Let the Children Live Wesley Broadway Methodist Church, PN

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 November 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.

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:

We would like the Council to place restrictions on the location of further licences, taking into account whether the premises are located near schools, buildings used for educational and religious purposes.

We would also propose that in deciding whether to issue further licences, the Council obtains expert advice on the likely effects on the use of on-licence premises by young people.

SUBMISSIONS CLOSE 4PM, FRIDAY 9 OCTOBER 2020



Submission Form

Draft Local Alcohol Policy 2020

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Trading hours

19-2

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 some on-licensed premises (taverns/bars, hotels, and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm, 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:

We support the proposed reductions in trading hours.

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:

See comments on previous page, regarding "issuing further licences".

SUBMISSIONS CLOSE 4PM, FRIDAY 9 OCTOBER 2020



Submission Form

Draft Local Alcohol Policy 2020

PAGE 3 OF 4

One-way door restrictions

19-3

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 proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

☒ 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:

SUBMISSIONS CLOSE 4PM, FRIDAY 9 OCTOBER 2020



Submission Form

Draft Local Alcohol Policy 2020

PAGE 4 OF 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:

19-4
We approve of the modified draft policy, particularly the door restriction policy.

We congratulate the people concerned for the amount of thought and work that has been put into this, and the steps that have been taken to encourage members of the public to be involved.



To get your submission to us, either:



Mail to: Draft Local Alcohol Policy 2020 Submissions, Democracy & Governance, Palmerston North City Council, Private Bag 11034, Palmerston North 4442



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



Email to: submission@pncc.govt.nz (write Draft Local Alcohol Policy 2020 Submissions in the subject)



Phone: 06 356 8199



Fax: 06 355 4115

The submission period runs from 5 September 2020
until 4pm on Friday 9 October 2020

20-1

Manawatu Police submissions on the Palmerston North City Council draft Local Alcohol Policy
Version 3.

The Police submit;

A reduction in trading hours for on-licensed and off licensed premises will have an impact on minimising harm within our community.

Establishing consistent trading hours across all licenses provides equity to all businesses and transparency in decision making.

When considering the LAP the council should not focus only on the submissions made but on the silent majority, our community, who trust the council to make sound decisions on their safety within the community.

Manawatu Police make the following submissions based on our strategic plan "Our Business" through our vision *To Be The Safest Country* our purpose *To Ensure Everybody Can Feel Safe And Be Safe* and our mission *To Prevent Crime and Harm*.

The Local Alcohol Policy (LAP) has three key 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

The Police in their submissions seek the Council to reconsider their current draft LAP v3 and return to the original draft LAP v2 for on-licensed premises, including Hotels, Taverns and Class 1 Restaurants, restricting sales from 8.00am until 2.00am and not the proposed 3.00am closing in LAP v3. The restriction in trading hours will have a positive reduction in violent crime, disorder and injuries from the consumption of alcohol.

The proposal for a reduction in trading hours for off licensed premises in LAP v3 is supported by Police as sales have a direct link to pre-loading and family harm.

Police are supportive of the One-way door policy but the submitter could not find empirical evidence that such policies are effective. Further, the rational as stated in the draft LAP (page 23) "*is expected to minimise alcohol related harm by limiting the number of people who could reach intoxication towards the end of trading*" is overly optimistic and appears more about approving later trading times with ability to say a strategy is in place to compensate for the additional hour of alcohol sales.

Police make submissions to the Palmerston North City Council for the proposed Licenced Alcohol Policy from the aspects of prevention first, (reducing crime and its effects), as an invested partner with the Council and the Safety Advisory Board in attaining the city's accreditation as an International Safe City, and welfare of our people working a roster specifically extended to manage the incidents of disorder and violence upon the closing of our licenced premises at 3.00am.

The Pan Pacific Safe Communities Network defines a safe community as an attractive place to live, work and visit. The World Health Organization views the safe communities' approach as an important means of delivering evidence-based violence and injury prevention strategies at the local level. The Palmerston North City Council has signed up to this as a contributor and support of the Safety Advisory Board and indeed, promoting itself as an international safe city. An evidence based LAP would be one stream of such a strategy.

20-2

Reduction of trading hours for On-licence premises.

Police submit that there is a direct link between sale of alcohol on licenced premises and alcohol related harm contrary to the Council's research report. Much is made of "pre-loading" by submitters and this problem behaviour is exasperated by on licenced alcohol sales as the "pre-loaded" are "topped up". An additional hour of alcohol sales has an effect on these patrons.

Police do not agree with the research report produced for the LAP where it states *"that there was not enough local evidence to suggest that a reduction in trading hours for on-licensed premises would minimise alcohol related harm."*

Police agree that their information available currently from the incidents of violence, disorder and drunkenness which occurs every Saturday and Sunday mornings when the on-licensed premises are trading, does not specify alcohol was involved or where the persons involved imbibed, be it on-licensed premise or at home, however we have been offered an accurate window to this issue with COVID19.

During COVID19 Level 4 there was almost zero calls for police service to deal with public place violence, disorder and drunkenness. As the community moved to Level 3 there was little change. It must be noted that some off-licensed premises were still trading through this time so alcohol was available to our community.

As the community moved into Level 2 and some of the on-license premises again began to operate, violence, disorder and drunkenness began to reappear. Once Palmerston North City went back to Level 1, the city returned to increased levels of violence, disorder and drunkenness.

Police can say that Family Harm (which is a wide spectrum from arguments to violence) did not increase significantly during the COVID19 lockdown periods as expected, alcohol was still available and people drank unsupervised in their own homes.

Police submit that in Palmerston North City a reduction in crime, including assaults and disorder can be achieved through a reduction in trading times as we have recently experienced through the alert levels of COVID19.

Further evidence is in the recent New Zealand based research from Professor Connor of Otago University which indicated an hour's reduction in alcohol sales can reduce violent crime by 11%.

Her research article *"Changes in the incidence of assault after restrictions on late night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data."* Published 22 July 2020. (Copy attached)

Professor Connor and her researchers found the incidence of hospitalized weekend assaults to be much higher in 15-29 year olds than in any other age group, the same cohort where the prevalence of hazardous drinking is highest.

Comparisons of data when an hour earlier closing time restrictions were implemented was interrogated enabling Professor Connor to estimate an 11% reduction in weekend assault hospitalisations, with a maximal reduction of 18% in the 15-29 year old cohort.

Translating this to the Palmerston North City late night drinking scene the 18 – 29 year olds would be the significant majority of patrons attending our on-licensed premises. Therefore, changes in the

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trading hours would have the biggest impact on this cohort with a corresponding increased reduction in violent crime, either as a victim or offender.

Professor Connor also refers to a 2015 NZ research report on alcohol purchasing which identifies 77% of drinkers purchasing from on-licensed premises between mid-night and 4.00am were 18 – 24 year olds with 66% of them being at risk drinkers. Purchasers from off-licensed premises from 8.00pm until 11.00pm were also predominantly from this age group (67%) and 61% were at risk drinkers.

Police submit that this NZ based research provides a tangible direction, supporting Council in their role of minimising the harm caused by excessive or inappropriate consumption of alcohol.

Professor Connor provides a more compelling direction to reduce the trading hours of off-licence and on-licensed premises in that her research also discovered fewer assaults hospitalizations involving children could be plausibly related to reduced drinking in 15 – 29 year olds. This was particularly so for infants.

Finally Professor Connor cites research on the impact of the Sale and Supply of Alcohol Act (SSAA) on the alcohol environment which concluded that: maximum trading hours were the only element of the SSAA found to create a swift change in the alcohol environment by slightly reducing availability in main cities.

Police submit that a reduction in the trading hours for off-licence and on-licence premises will have a positive impact on minimising the harm caused by excessive or inappropriate consumption of alcohol including the health and wellbeing of our most vulnerable, our children.

Responding to submission pro-3.00am closing:

The Police initiated voluntary 2.00am trial as highlighted by some submitters cannot be relied upon as positive support either way as unfortunately the trial did not have an evaluation process in place. This would have provided the necessary data to support or negate the hypotheses that 2.00am closing reduced violence, disorder and drunkenness. The attached information from the Police Intelligence team in fact indicates there was a slight reduction in violence during the voluntary trial.

The data needs to be considered with caution as the police codes used to identify the numbers for analysis, group any number of offences and there is no way of identifying which of those offences related to the consumption of alcohol. Secondly at the conclusion of the trial police initiated a new roster which provided two shifts working to cover the later 3.00am closing time.

Therefore the statistical reduction in the data provided can be attributed to the increased number of police officers deployed and visible, reducing offences and incidents.

Submitters stated anecdotal evidence showed that violence increased and this was attributed to people pre-loading more before they came to the on-licensed premises. The data shows an increase of 7 violent offences over the year May 2017 to April 2018.

Police again submit that pre-loading is only part of the issue, because the violence, disorder and drunkenness predominantly still occurs at closing time, or after, not when the patrons first come to town/on-licensed premises.

The second part of the issue is that on-licensed premises “top up” the pre-loaders which adds to the behaviour of their patrons and can be the cause of violence, disorder and drunkenness.

20-4

Some submitters stated they saw a drop in patronage and revenue due to other on-licensed premises not participating in the trial drawing their customers away. Should a 2.00am closing time be introduced then all on-licensed premises would be subject to that time and this would be fair to all on-licence premises.

The argument raised regarding financial loss needs also to be balanced with operating costs. Anecdotally Police are informed by employees of the on-licensed premises that the last hour of trading does not meet operating costs.

Police note that the Alcohol Regulatory Licensing Authority is quite clear that Councils in considering their LAP's should not focus on the economic impacts, but the safe and responsible consumption of alcohol and the minimisation of alcohol related harm.

With on-licence premises, consumption of the alcohol is contingent upon being at the licensed premise (so consumption must occur within the hours of trading). Experience shows Police that the significant majority of patrons who attend the late closure licenced premises do not come into town until after 11.00pm therefore it is a social behaviour not a necessity.

The submission from Police that the trading hours be reduced to 2.00am closing would not affect the time patrons have to share in the nightlife activity it would simply mean a behavioural change to attend.

Our city is not a destination that attracts the party scene public, our commerce does not rely upon or promote itself as such a destination, however if the Council is to consider this argument then Police would identify the State of California in the USA with their cities such as San Diego promoting themselves as *"The nightlife in this global tourist centre is world-famous, especially in the Gaslamp Quarter."* Palo Alto, a small city by comparison, population 66,000 describes itself as; *it may be a small town, but it feels far from sleepy. The night scene is bubbly, with plenty of bars and clubs for everyone, from the college kids to those who prefer it low-key.*ⁱⁱ

Police note that licenced premises in the State of California cannot sell alcohol after 2.00am. These cities are internationally renowned for their night life yet have a 2.00am end of alcohol sales restriction. It is a further offence to allow patrons to drink alcohol on licenced premises after 2.00am.ⁱⁱⁱ

While the argument can be raised that Palmerston North is nothing like the cities of California, the point is that cities which rely upon and promote themselves on nightlife commerce, survive and prosper under a 2.00am closure restriction.

Reduction of alcohol related harm should not only focus on members of our community, police submit that council should also consider the police officers who have to deal with the intoxicated and disorderly patrons attending on-licenced premises and managing the aftermath at 3.00am when the on-licence premises close.

To meet this demand, Palmerston North Police have modified the roster from a 7.00am finish, to an 8.00am finish, providing for two Public Safety Teams to be working at one time. The new roster was established to have the additional staff working to deal with the volume of crime and disorder the city was experiencing and to ensure we had sufficient officers to support each other in an effort to minimise the risk to our officers from drunken violent behaviour.

20-5

The additional hour also accommodates follow up action by the officers working to deal with those arrested, the requisite paper work to be prepared for their detention and prosecution.

Police submit that reducing the trading hours of on-licensed premises will have a positive effect on the health and wellbeing of their officers.

Police support the proposal to address pre-loading by reducing trading hours proportionately across all licensed premises. Therefore, there should be a corresponding reduction in the trading hours of on-licensed premises, as the notion of encouraging people to drink in on-licensed premises because they are supervised is fraught.

As detailed above on-licensed premises "top up" the pre-loaders and while they are supervised in the premises it is when they leave that there are reports of violence, disorder and drunkenness which police are called to attend.

Police would submit that supervision in an on-licensed premise may not be as safe as envisaged, simply because incidents are not reported from within the licensed premises. This is supported by the fact that often police attend incidents of violence or disorder outside or down the road from an on-licensed premise to be told it all started over something that happened within a bar.

Police can say the Commander of New Zealand Army's 1 (NZ) Brigade located in Linton has ordered local New Zealand Defence Force personnel not to attend one licensed premise in Palmerston North. This decision was made by an employer of a large number of people who was seeing the negative effects of alcohol on particularly younger military personnel, associated with their attendance at some licensed premises. Within this context Commander 1 (NZ) Brigade is appreciative of the continued efforts of Palmerston North City Council and that of New Zealand Police to reduce alcohol related harm and create safe and positive environments throughout the city.

The Sale and Purchase of Alcohol Act was intended for the licensed managers to take a greater responsibility for the alcohol served and the management of the persons being served. That does not appear to have been effective in Palmerston North City with the Defence Force restricting its staff from attending a specific bar and the emergency services responsible for managing the persons who have been served and left these premises in various states of intoxication.

St John's Ambulance reports an increased draw on their resources, attending heavily intoxicated people, victims of violent crime and at times, transporting to hospital for medical care.

Police submit that a reduction of one hour's trading time for on-licensed premises will have a positive effect on reducing violent crime within the city, and according to the NZ research of Professor Connor may reduce assaults on children under the age of 14. There would also be an improvement in the wellness and safety of our police officers.

Palmerston North City Council enforcing this policy change will show their commitment to evidence-based violence and injury prevention strategy. One focused not only on the victims and perpetrators of violence and disorder but also the men and women of the Emergency Services whose job it is to administer medical care or maintain law and order.

One-way Door Policy

Police are supportive of the one-way door policy with the submitter finding the 2018 Whangārei City one-way door policy evaluation equivocal;

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"Overall, we cannot definitively conclude from the quantitative analysis that the Whangārei one-way door policy has decreased Police calls-for-service or observed antisocial behaviour in the Whangārei CBD. However, the qualitative evidence based on the observations of those who are likely to be best able to evaluate the on-the ground reality of the implementation and effects of the policy, suggests that the overall impacts have been positive."

The one-way door policy made people feel safer but the evaluation did not find that they were necessarily safer.

Police support the one-way door policy as it makes our people feel safer.

To counter the Wellington District Licensing Committee's (DLC) concerns voiced in the Siglo bar case, Manawatu Police are working with the Palmerston North City Council on a prevention plan to restrict parking in Main Street during the hours of 11.00pm to 3.00am Friday and Saturday nights to eliminate the ability for people to remain outside the on-licensed premises and pre-load or loiter around the cars parked there.

iv One-way door policy rejected for popular Wellington bar Siglo.

The DLC did not think there was enough evidence to justify one-way door policies, and there was concern that the policy could worsen alcohol-related harm if patrons stopped from entering bars continued to drink outside of licensed premises or loitered in the streets.

Discretionary Conditions

The police have no submissions on Discretionary Conditions as the Council details in the explanatory notes the District Licensing Committee can impose any conditions on a licence that it considers necessary.

Trading Hours Off-Licenses

Police believe a consistent approach to all off-licensed premises is wise. Different closing times for various off licence premises is commercially unfair and difficult to manage.

P v3 to reduce the closing time for off-licensed premises to sell alcohol to 9.00pm.

Police submit that Professor Connor's research supports the earlier closing time of off-licensed premises reducing harm in the community.

Issuing of further off-licenses

All licensed premises, either on or off-license have to accept that they contribute in some way to alcohol related harm, therefore there is an intricately fine line between availability and restriction to keep our people safe.

Reported family harm is on the increase and police can say that alcohol is a symptom in a high proportion of these episodes.

Police submit while accepting the above statements they are not seeking a restriction on the number of off-licenses, they would seek from Council a confirmation that careful consideration will be applied to each new application for an off licence.

Conclusion

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Palmerston North City Council's goal, which is supported by Police, is to have a safe community, which is an attractive place to live, work and visit, the police experience at 3.00am on a Saturday and Sunday morning as detailed above does not support that statement. Palmerston North police operate a special roster specifically to have maximum deployable staff available to respond to the disorder and violence that is perpetrated by intoxicated persons.

Police submit that; A reduction in trading hours for on-licensed and off licensed premises will have an impact on minimising harm within our community.

Establishing consistent trading hours across all licenses provides equity to all businesses and transparency in decision making.

When considering the LAP the council should not focus only on the submissions made but on the silent majority, our community, who trust the council to make sound decisions on their safety within the community.

Actions need to be taken to reduce alcohol related harm and restrictions on trading hours is one strategy that research informs us will have a positive outcome.

Submissions made by: Inspector Ross Grantham, Prevention Manager Manawatu

ⁱ <https://www.thecrazytourist.com/15-best-places-live-california/>

ⁱⁱ <https://www.thecrazytourist.com/15-best-places-live-california/>

ⁱⁱⁱ [https://www.hpa.org.nz/sites/default/files/Final-Report-Whangarei-One-Way-Door-Policy-California Alcoholic Beverage Control Act 2020 Article 2 subsections 25631 and 25632.Evaluation-UoW-May2018.pdf](https://www.hpa.org.nz/sites/default/files/Final-Report-Whangarei-One-Way-Door-Policy-California%20Alcoholic%20Beverage%20Control%20Act%202020%20Article%202%20subsections%2025631%20and%2025632.Evaluation-UoW-May2018.pdf)

^{iv} <https://www.newshub.co.nz/home/money/2016/10/one-way-door-policy-rejected-for-popular-wellington-bar-siglo.html>

Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data

Jennie Connor¹ , Brett MacLennan¹, Taisia Huckle² , Jose Romeo² , Gabrielle Davie³ & Kypros Kypri^{1,4} 

Department of Preventive and Social Medicine, University of Otago Medical School, Dunedin, New Zealand,¹ SHORE and Whanaki Research Centre, College of Health, Massey University, New Zealand,² Injury Prevention Research Unit, Department of Preventive and Social Medicine, University of Otago, New Zealand³ and School of Medicine and Public Health, University of Newcastle, Australia⁴

ABSTRACT

Aims To estimate the effect of national restrictions on late-night availability of alcohol on alcohol-related assault at a population level as indicated by (1) change in hospitalizations for weekend assaults and (2) change in the proportion of assaults documented by police that occur at night. **Design** Evaluation of a natural experiment, involving: (1) pre-post comparisons of age-specific incidence rates, adjusted for seasonality and background trend using Poisson regression; and (2) interrupted time-series analyses, using seasonal autoregressive integrated moving average (SARIMA) models of national data with no control site. **Setting** New Zealand. **Participants** (1) Inpatients discharged from NZ hospitals following assault during the weekend (Friday–Sunday) from 2004 to 2016 ($n = 14996$) and (2) cases of assault recorded by NZ Police from 2012 to 2018. **Intervention**: introduction of national maximum trading hours for all on-licence (8 a.m.–4 a.m.) and off-licence premises (7 a.m.–11 p.m.), abolishing existing 24-hour licences, on 18 December 2013. **Measurements** (1) Age-specific incidence of hospitalization for assault on Friday, Saturday or Sunday from the national hospital discharge data set, excluding short-stay emergency department admissions and (2) proportion of weekly police-documented assaults occurring between 9 p.m. and 5.59 a.m., from NZ Police Demand and Activity data set. **Findings** Following the restrictions, weekend hospitalized assaults declined by 11% [incidence rate ratio (IRR) = 0.89; 95% confidence interval (CI) = 0.84, 0.94], with the greatest reduction among 15–29-year-olds (IRR = 0.82; 95% CI = 0.76, 0.89). There was an absolute reduction (step change) of 1.8% (95% CI = 0.2, 3.5%) in the proportion of police-documented assaults occurring at night, equivalent to 9.70 (95% CI = 0.10, 19.30) fewer night-time assaults per week, out of 207.4. **Conclusions** The 2013 implementation of national maximum trading hours for alcohol in NZ was followed by reductions in two complementary indicators of alcohol-related assault, consistent with beneficial effects of modest nation-wide restrictions on the late-night availability of alcohol.

Keywords Alcohol, assault, availability, legislation, natural experiment, restriction, trading hours.

Correspondence to: Jennie Connor, Department of Preventive and Social Medicine, University of Otago, 18 Frederick St, Dunedin 9016, New Zealand. E-mail: jennie.connor@otago.ac.nz

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INTRODUCTION

Alcohol consumption is a leading contributor to the global burden of disease, killing 3 million people per year [1], despite the fact that only a third of people drink [2]. If transnational corporations continue developing alcohol markets in low- and middle-income countries, global health losses will balloon this century. Evidence on the effects of major policy changes may guide decision-makers in countries

with long-standing alcohol problems, and in countries whose prevalence of drinking is currently low [3]. Here we study a 'natural experiment' of alcohol policy changes in New Zealand [4].

New Zealand's per capita alcohol consumption is approximately 10.7 litres [5]. The prevalence of hazardous drinking (AUDIT score > 8) is highest in 18–24-year-old men (45%) and 25–34-year-old men (34%) [6, 7], and the burden of alcohol-related disease is greatest for

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Māori (New Zealand's indigenous people) and lower socio-economic groups [6–8].

As in many high-income countries, New Zealand deregulated alcohol markets in the 1980s and 1990s, resulting in a proliferation of outlets, greater competition, more discounting and promotion [9] and significant harm to the population [10–12]. In response to public concern, particularly about violence [13], the government commissioned an independent review, and in 2010 the Law Commission recommended major reforms [14]. On 18 December 2013, the Sale and Supply of Alcohol Act 2012 (SSAA) introduced: (1) a process for local governments to develop local alcohol policies (LAPs); (2) maximum trading hours for all on-licence (8 a.m.–4 a.m.) and off-licence premises (7 a.m.–11 p.m.), abolishing 24-hour licences; (3) new offences of irresponsible alcohol advertising or promotion, and of supplying alcohol to a person aged under 18 years without parental consent. Phasing-out licences for small grocery stores and restricting alcohol displays in supermarkets occurred on the issuing or renewal of a licence during the following 3 years [15].

Few LAPs were implemented during the first 3 years due to appeals by supermarkets and other large off-licence retailers [16]. A study of the SSAA's impact on the alcohol environment from 2013 to 2015 found: 'No impact on number of premises, supply to minors or marketing was identified' [17]. Therefore, the main changes to alcohol availability implemented on 18 December 2013 were reductions in trading hours of on-licence premises beyond 4 a.m. and off-licence premises that had operated after 11 p.m. or before 7 a.m. [17]. Outlets already operating with shorter hours remained bound by their existing licence. A survey estimated that 1% of alcohol shops, 9% of supermarkets and 6% of bars and nightclubs would close earlier [18].

A recent systematic review of 22 studies employing controlled designs to examine the effects of changes in alcohol trading hours concluded that: 'harm typically increases after extensions in on-licence alcohol trading hours... and... decreases when on- and off-licence trading

hours are restricted' [19]. Only seven studies examined restrictions and none were of changes in national policies, making this New Zealand policy change a potentially valuable natural experiment, albeit one without a contemporaneously unexposed control area.

As part of a wider evaluation of the law changes [20], we developed hypotheses about how the changes in the new maximum trading hours would affect measurable outcomes (Fig. 1), as indicated by (1) age-specific changes in weekend hospitalizations for assault and (2) change in night-time assaults documented by police.

METHODS

Registration

We presented an evaluation plan at the outset of this research project [20] but did not pre-specify the analyses. Accordingly, as per this journal's guidelines, we advise readers to view the results as exploratory.

Design

We designed this study to estimate the association between the 18 December 2013 law change and two temporal surrogates for alcohol-related assault: (1) hospitalized weekend assaults and (2) police-documented night-time assaults. We used Poisson regression to calculate incidence rate ratios (IRRs) pre- and post-intervention for the first outcome. For the second, we employed an interrupted time-series design and the seasonal autoregressive integrated moving average (SARIMA) model [21]. To test the robustness of the results, we performed sensitivity analyses.

Ascertaining whether alcohol contributes to specific assaults is impossible in New Zealand's routine data, as hospital records [22] and police reports [23] lack reliable indicators of alcohol involvement, and the person identified may not have been the perpetrator. We therefore restricted the outcomes to those occurring at times when they are likely to involve alcohol [24]. NZ police audits estimate that 75% of assaults after 9 p.m. are alcohol-related [25]. Any

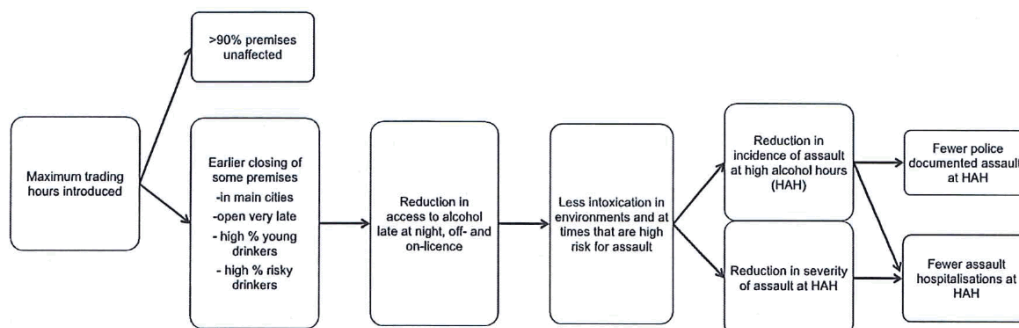


Figure 1 Potential effect of maximum trading hours provisions on police-documented assaults and hospitalized weekend assaults

lack of specificity in these indicators (i.e. from including assaults that are not alcohol-related) would bias estimates towards the null because assaults unrelated to alcohol would be unaffected by changes in alcohol availability, thereby underestimating the true association.

As the legislation was national, there was no contemporaneously unexposed area. Using the proportion of assaults occurring at night as the primary measure from police reports, rather than the incidence of night-time assaults, provides some control for potential confounders that affect all assaults (e.g. changes in police numbers). To increase confidence in our pre-post comparisons, we performed temporal falsification tests [26] for the interrupted time-series analysis of police data, and modelled a substitute outcome for hospitalizations [4].

Data

For the first outcome, we used New Zealand's National Minimum Data Set (NMDS) of hospital discharges from mid-2004 to mid-2016 (9.5 years pre- and 2.5 years post-intervention). NMDS inclusion is mandatory for publicly funded inpatient treatment in New Zealand hospitals [27]. As recommended by the Ministry of Health classification, we excluded short-stay emergency department discharges, whose counts can vary according to coding practices [28], and we excluded re-admissions for the same injury event to avoid double counting [29].

For the second outcome we used weekly counts from the New Zealand police demand and activity data set for 2012–18 (76 weeks pre- and 216 weeks post-intervention) of events involving assault recorded by police nationally [24]. Our primary analysis focused on night-time assaults (9 p.m.–5.59 a.m.) as a proportion of all assaults.

Measures

Criterion variables

For hospitalized weekend assaults, we defined cases as discharges with first-listed external cause of injury codes X85–Y09 or Y871, hospitalized within 2 weeks of the injury regardless of length of stay [30]. The NMDS does not specify the time of injury, so we included all hospital discharges for 'weekend' assaults (occurring on Friday, Saturday or Sunday) and calculated incidence rates per 100 000 person-years.

For the police data, we used the 'all assaults' category, comprising common assault, serious assault, other acts intended to cause violence and male assaults female. We calculated the proportion of all assaults that occurred at night (9 p.m.–5.59 a.m.) by week for the primary outcome and the ratio of night-time to daytime assaults as sensitivity analysis.

Intervention

The intervention date was 18 December 2013. For hospitalized weekend assaults, we coded a dummy variable as '0' for 19 June 2004 to 18 December 2013 or '1' for 19 December 2013 to 18 June 2016. For police assaults, we coded a dummy variable as '0' for 1 July 2012 to 18 December 2013 and '1' for 19 December 2013 to 31 January 2018.

Age groups

We categorized hospital patients as 0–14, 15–29, 30–49, 50–69 or 70 + years of age. The police data set contained no age data.

Statistical methods

Hospitalized weekend assaults

We calculated incidence rates per 100 000 person-years for pre- and post-change periods, using mid-year estimates of 'usually resident' populations as denominators [31]. Where Territorial Authorities (TAs) had a LAP in place before 18 June 2016 we removed cases from the numerator and corresponding populations from the denominator. To adjust for season, we computed 3-monthly rates, using linear interpolation to derive quarterly denominators from annual population estimates.

Using Poisson regression we calculated incidence rate ratios (IRRs) with 95% confidence intervals (CI) for each age group and overall. We adjusted IRRs for seasonality and secular trend by including categorical variables designating quarters (1–4) and a continuous variable counting the quarters from 1 (19 June 2004 to 18 December 2004) to 48 (19 March 2016 to 18 June 2016).

On examining all 67 TAs, we identified three with no LAP in place (Hamilton, Nelson, Christchurch), that bordered TAs with LAPs and were likely to have some residents drinking in the bordering TA admitted to their city hospital. To test the sensitivity of our comparison to such misclassification, we replicated the analysis excluding those three TAs.

Proportion of assaults occurring at night

We first calculated the prevalence ratio, before and after the restrictions. To adjust for seasonality and background trend in the data, we used SARIMA models to estimate the association between the implementation of the restrictions on 18 December 2013 and the proportion of assaults occurring at night. Given that this was a permanent/continuous intervention, the intervention models tested for abrupt permanent change, where the overall mean of the time series is shifted after the intervention (a 'step change') and gradual permanent association, where the change after the intervention is gradual, and

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the final permanent impact occurs after a lag (a 'slope change'). We fitted the following model:

$$Y_t = v(B)I_t + \frac{1}{(1-B)(1-B^s)\phi(B)}\theta(B)a_t,$$

where Y_t is the weekly proportion of night-time assaults at time t , B is the backshift operator, I_t is the dummy variable taking the value '1' during the intervention period and '0' otherwise, s is the order of the seasonal part, $\theta(B)$ is the moving-average operator, $\phi(B)$ is the autoregressive operator and a_t the random error. The term $v(B)$ corresponds to the transfer function which is given by ω_0 or $\frac{\omega_0}{1-\delta_1}$

which incorporates an abrupt permanent change or a gradual permanent association in the model. The gradual permanent association model encompasses the abrupt one (the latter is a particular case of the former when denominator factor is $\delta_1 = 0$). First, we fitted the gradual one, and if the denominator factor was not significant we fitted the model containing only the post-period effect ω_0 .

We observed a seasonal pattern (every 52 weeks) and downward trend in the data. Seasonality, autocorrelation, lags and correct specification of the model residuals were assessed using autocorrelation (ACF), partial autocorrelation functions (PACF) and Ljung–Box tests for 'white noise'. We designated the input variable in the post-change period as a continuing intervention. We implemented SARIMA models using *proc arima* in SAS version 9.4.

To address the possibility that the results were sensitive to the measure of occurrence that we used, we repeated the main analysis using ratios of night-time to daytime assaults, i.e. the odds that an assault occurred at night, in place of proportions of assaults that occurred at night.

Falsification tests

To increase confidence in our uncontrolled time-series analysis, we performed temporal falsification tests. Following De Vocht *et al.* [26], we used dummy intervention dates 6 months earlier (18 June 2013) and 6 months later (18 June 2014), on the premise that changes in outcome should not be associated with those dates. For the Poisson regression analysis, temporal falsification was not a coherent strategy, so we tested for association with an injury outcome expected to be unaffected by the intervention; namely, 'overexertion or strenuous movements or postures' (external cause code X50).

RESULTS

Change in hospitalized weekend assaults

Figure 2 shows the annual incidence of hospitalized assault by age group from 2004 to 2016. In the 15–29-year-olds there was an obvious reduction in hospitalization between 2013 and 2014, and fewer marked reductions in most other age groups.

Table 1 presents age-specific incidence rates for hospitalized weekend assaults, before and after the restrictions. The primary analysis estimated an adjusted IRR of 0.89 (95% CI = 0.84, 0.94) for the post-change period compared to the pre-change period including all age groups in the 53 eligible TAs. Reductions were largest among 15–29-year-olds (IRR = 0.82; 95% CI = 0.76, 0.89) and there was a large relative reduction in the oldest age group in the adjusted model. The sensitivity analysis excluding TAs with potential for cross-boundary effects produced similar results.

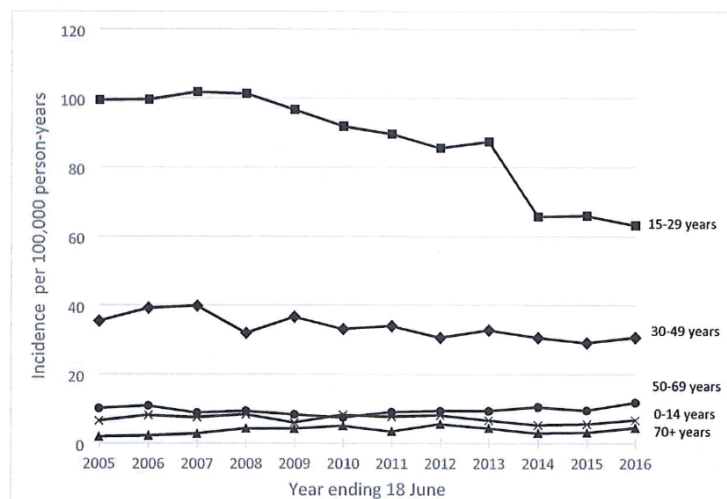


Figure 2 Annual incidence of hospitalization due to assault occurring between midnight Thursday and midnight Sunday in areas with no local alcohol policy, New Zealand, 19 June 2004–18 June 2016. Rates per 100000 by age group

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Table 1 Hospitalizations for weekend assaults,^a by age group and time-period, in NZ Territorial Authority areas without a Local Alcohol Policy, July 2004–June 2016.

	Age (years)	Numerator		Denominator		Incidence		Post-change, pre-change		Adjusted ^b
				(person-years)		Per 100000 person-years				
		Pre	Post	Pre	Post	Pre	Post	IRR	95% CI	
Primary analysis										
All Territorial Authority areas without a local alcohol policy in place at 18 June 2016	All ages	12355	2641	36953184	10309056	33.4	25.6	0.77	(0.74, 0.80)	Adj IRR 0.89 (0.84, 0.94)
	70+	122	34	3156273	965333	3.9	3.5	0.91	(0.62, 1.33)	0.56 (0.33, 0.93)
	50–69	722	255	7749547	2380963	9.3	10.7	1.15	(1.00, 1.33)	1.17 (0.95, 1.44)
	30–49	3659	802	10513056	2695216	34.8	29.8	0.86	(0.79, 0.92)	0.96 (0.86, 1.06)
	15–29	7279	1426	7809993	2205852	93.2	64.6	0.69	(0.66, 0.73)	0.82 (0.76, 0.89)
Sensitivity analysis	0–14	573	124	7724315	2061693	7.4	6.0	0.81	(0.67, 0.98)	0.83 (0.64, 1.08)
	All ages	10751	2301	31731857	8881322	33.9	25.9	0.77	(0.73, 0.80)	0.91 (0.86, 0.97)
	70+	102	30	2669540	827976	3.8	3.6	0.95	(0.63, 1.43)	0.65 (0.37, 1.14)
	50–69	639	227	6674446	2060904	9.6	11.0	1.15	(0.99, 1.34)	1.22 (0.97, 1.52)
Except Nelson, Christchurch and Hamilton	30–49	3211	699	9048696	2319370	35.5	30.1	0.85	(0.78, 0.92)	0.98 (0.87, 1.10)
	15–29	6331	1247	6625227	1875653	95.6	66.5	0.70	(0.66, 0.74)	0.84 (0.78, 0.92)
	0–14	468	98	6713948	1797419	7.0	5.5	0.78	(0.63, 0.97)	0.88 (0.66, 1.19)
	All ages	1153	343	36953184	10309056	3.1	3.3	1.07	(0.95, 1.20)	1.22 (1.02, 1.45)
All Territorial Authority areas without a local alcohol policy in place at 18 June 2016	70+	256	74	3156273	965333	8.1	7.7	0.95	(0.73, 1.22)	1.06 (0.73, 1.53)
	50–69	289	93	7749547	2380963	3.7	3.9	1.05	(0.83, 1.32)	1.19 (0.84, 1.67)
	30–49	334	89	10513056	2695216	3.2	3.3	1.04	(0.82, 1.31)	1.34 (0.96, 1.89)
	15–29	226	70	7809993	2205852	2.9	3.2	1.10	(0.84, 1.43)	1.25 (0.84, 1.85)
	0–14	48	17	7724315	2061693	0.6	0.8	1.33	(0.76, 2.31)	1.29 (0.57, 2.94)

^aFirst listed E-codes X85–Y09, Y871 for injury between midnight Thursday and midnight Sunday; ^badjusted for seasonality and secular trend. CI = confidence interval; IRR = incidence rate ratio.

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The falsification test using hospitalizations for overexertion as a substitute outcome showed an increase in incidence (adjusted IRR = 1.22; 95% CI = 1.02, 1.45) with no evidence of a differential effect by age group.

Change in police-documented night-time assaults

Figure 3 shows the time-series of proportions of police-documented assaults that occurred at night, by week, during the study period, with individual estimates ranging from 26 to 50%. The vertical reference line indicates the date of the intervention.

We obtained a stationary series after twice differentiating the series at lags 52 and 1. We detected significant lags of order 1, 15 and 52 ACF and PACF, and could not reject the white noise assumption for the residuals.

Table 2 presents the unadjusted effect estimates and the SARIMA models estimating change in the proportion of assaults occurring at night with implementation of the restrictions. The unadjusted prevalence ratio suggests a 13% reduction in the proportion of all assaults occurring at night (OR = 0.87; 95% CI = 0.78, 0.98). The SARIMA modelling, which adjusts for seasonality and secular trend, shows that the intervention was associated with an abrupt reduction in the proportion of assaults occurring at night of 1.8% (95% CI = 0.2%, 3.5%). This is rounded to -0.02 in the table, where it is labelled 'post-period'. The gradual permanent change in the intervention model was estimated as -0.29 (95% CI = -2.39, 1.80), thus

we concluded that there was no evidence of an ongoing effect. The 1.8% reduction in the proportion of assaults occurring at night is equivalent to a 4.7% reduction in night-time assaults, i.e. 9.70 (95% CI = 0.10, 19.30) out of 207.4 fewer night-time assaults per week. Temporal falsification tests did not find a reduction in the post-period of the models with dummy intervention dates.

Our sensitivity analysis using the ratio of night-time to daytime assaults produced similar results. This SARIMA model demonstrated that the restrictions were followed by a gradual permanent reduction commencing a season later (shift 1) in the night/daytime ratio of assaults of 1.9%.

DISCUSSION

We found a reduction in assaults occurring at times of usually high alcohol involvement following the implementation of the Sale and Supply of Alcohol Act, in two complementary analyses of national data. The first estimated a reduction of 11% in the incidence of hospitalized assaults; the second a 4.7% reduction in police-documented night-time assaults.

Having excluded local government areas with a LAP in place, which may have experienced other changes in availability, we were principally evaluating restrictions on trading hours that were nation-wide but affected a small proportion of alcohol outlets. Even if few in number, these outlets may be disproportionately important contributors to alcohol-related assault, as they were on-licence premises

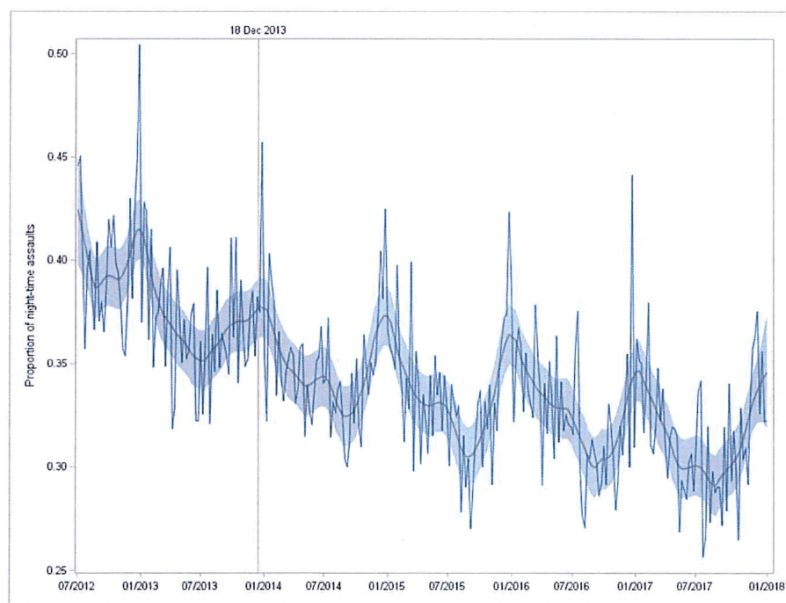


Figure 3 Proportion of assaults documented by police that occurred between 9:00 p.m. and 5:59 a.m., in New Zealand Territorial Authority areas with no local alcohol policy, July 2012–January 2018. The blue continuous line represents fitted values from a locally estimated scatterplot smoothing (LOESS) function, including 95% confidence intervals [Colour figure can be viewed at wileyonlinelibrary.com]

Table 2 Association of police-documented night-time assaults with implementation of SSAA 2012 in New Zealand Territorial Authority areas with no local alcohol policy, July 2012–January 2018.

	Proportion of assaults occurring at night				Proportion of assaults occurring at night: SARIMA ^a model			
	Pre-change		Post-change		Post: pre-change		Lag	Shift
	Mean	95% CI	Mean	95% CI	Prev. ratio	95% CI		
Primary analysis								
Pre-change period:								
1 July 2012–18 December 2013	0.38	(0.37, 0.39)	0.33	(0.33, 0.34)	0.87	(0.78, 0.98)	MA1.1	1
Post-change period:							MA2.1	15
19 December 2013–31 January 2018							MA3.1	52
							AR1.1	1
							Post-period	0
Proportion of assaults occurring at night: SARIMA model ^a							Estimate	SE
							0.88	0.04
							0.18	0.06
							0.7	0.1
							-0.14	0.07
							-0.02	0.01
							0.88	0.03
							0.2	0.06
							0.7	0.11
							-0.18	0.07
							-0.02	0.02
							-0.29	1.07
							0.87	0.04
							0.2	0.06
							0.68	0.1
							-0.14	0.07
							-0.01	0.01
							0.87	0.04
							0.19	0.06
							0.67	0.1
							-0.14	0.07
							0.01	0.01
							Ratio of night to daytime assaults: SARIMA model	
							MA1.1	1
							0.9	0.03
							< 0.0001	< 0.0001
							1	0
Temporal falsification test: intervention date 6 months earlier								
Pre-change period:								
1 July 2012–18 June 2013	0.39	(0.38, 0.40)	0.33	(0.33, 0.34)	0.86	(0.76, 0.97)	MA1.1	1
Post-change period:							MA2.1	15
19 June 2013–31 January 2018							MA3.1	52
Temporal falsification test: intervention date 6 months later							AR1.1	1
Pre-change period:							Post-period 6 months earlier	0
1 July 2012–18 June 2014	0.37	(0.37, 0.38)	0.33	(0.32, 0.33)	0.88	(0.78, 0.99)	MA1.1	1
Post-change period:							MA2.1	15
19 June 2014–31 January 2018							MA3.1	52
Sensitivity analysis: ratio of night to daytime assaults							AR1.1	1
							Post-period 6 months later	0
							Ratio of night to daytime assaults	
							MA1.1	1
							0.9	0.03
							< 0.0001	< 0.0001
							1	0

(Continues)

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Table 2. (Continued)

Proportion of assaults occurring at night				Proportion of assaults occurring at night: SARIMA ^a model									
Pre-change		Post-change		Post: pre-change				Parameter	Estimate	SE	P-value	Lag	Shift
Mean	95% CI	Mean	95% CI	Prev. ratio	95% CI	95% CI							
Pre-change period:													
1 July 2012–18 December 2013													
Post-change period:													
19 December 2013–31 January 2018													
							MA2,1	0.26	0.06	< 0.0001		15	0
							MA3,1	0.62	0.09	< 0.0001		52	0
							AR1,1	−0.18	0.07	0.009		1	0
							Post-period	−0.06	0.03	0.049		0	1
							Denom. factor ^b	−0.87	0.2	< 0.0001		1	1
							Asymptotic change ^c	−0.03					
							Change in proportion	−0.02					

^aSARIMA model for assessing gradual permanent change; ^bdenominator factor is the parameter related to the 'gradual' permanent decrease on the time-series after the intervention; ^casymptotic change is the impact of the gradual permanent effect on the level of the time-series. SSAA = Sale and Supply of Alcohol Act 2012; SARIMA = seasonal autoregressive integrated moving average; SE = standard error; CI = confidence interval.

previously trading after 4 a.m., and off-licences trading after 11 p.m., that were closed earlier by the new maximum closing times. Before the law change many outlets had operated under 24-hour licences but did not actually trade 24 hours a day, so the magnitude of the change in the population's exposure to the availability of alcohol is unknown. A recent review identified the lack of data on trading hours before restrictions as a common limitation [19].

We found the incidence of hospitalized weekend assault to be much higher in 15–29-year-olds than in other age groups throughout the study period, followed by the 30–49-year-olds, as expected. In an uncontrolled pre-post comparison of hospital discharges, we estimated a reduction in incidence of 11% overall with the maximal reduction of 18% in 15–29-year-olds. We adjusted for seasonal variability and background trend in incidence, and the estimates were robust to restrictive TA inclusion criteria and a falsification test with substitute outcome.

The age-group findings for hospitalizations are consistent with changes in assault being due to the new restrictions on late-night availability, as proposed in Fig. 1. The largest absolute changes were in the 15–29-year-olds, where the prevalence of hazardous drinking is highest, the incidence of assault is highest [32] and where exposure to the change in trading hours would be most frequent. New Zealand research on alcohol purchasing in 2015 reported that 77% of drinkers purchasing from on-licence premises between midnight and 4 a.m. were 18–24-year-olds, and 66% were 'at-risk' drinkers [33]. Purchasers from off-licences from 8 to 11 p.m. were also predominantly from this age group (67%), and 61% were 'at-risk' drinkers [33]. Fewer hospitalizations involving children is also plausibly related to reduced drinking in 15–29-year-olds, particularly for infants. The reduction seen in > 70-year-olds, while small in absolute numbers, was the largest relative change.

We also saw a reduction in police reports of assaults occurring at night. A sensitivity analysis using the ratio of night-time to daytime assaults found a reduction of similar magnitude but gradual, and falsification tests were also supportive of the findings.

Limitations

The study's primary limitation is the lack of an unexposed control group, due to the intervention being nation-wide and affecting all age groups. It is therefore difficult to rule out competing explanations for the observed changes. Important potential sources of confounding are other elements of the legislation that were implemented contemporaneously, and any change in police activity when the law came into effect. The three contemporaneous policy changes were introduction of LAPs and new offences relating to excessive promotion of alcohol and supplying alcohol

to a minor without express parental consent. We dealt with the first of these by excluding areas with a LAP in place any time within the study period and a sensitivity analysis for cross-boundary effects. We consider it unlikely that the two new offences would have had much influence on our main findings, but cannot rule that out. There are no data in the public domain on prosecutions under these provisions in the past 6 years, but they would be of public interest and likely to have been reported in the media.

An examination of the early impact of the SSAA on social supply to under 18-year-olds found that parents were supplying more alcohol, but social supply to underage friends had decreased by 8%. Levels of supply remained generally high [34]. Research on the impact of the SSAA on the alcohol environment [17] concluded that: 'Maximum trading hours were the only element of the SSAA found to create a swift change in the alcohol environment, by slightly reducing availability in main cities' (p. 14). Key informants perceived social supply regulations to have relatively poor compliance and to be almost unenforceable before and after the law change [17].

Data on night-time assaults recorded by police provide a broader indicator of the occurrence of assault than hospitalizations alone, but they have a weaker relationship with injury from alcohol-related assault than do hospital admissions and are more susceptible to service delivery artefacts [35], which could confound our results. It is plausible that police activity and reporting of assaults by staff and bystanders around late-night venues could have been affected by change in closing times independently of assault frequency. For example, if police activity increased due to the law change, documentation of assaults may have increased (a service delivery artefact) or it may have acted as a deterrent to assault, which would inflate any effect of earlier closing. Reduced reporting by licensed premises was explored in relation to late-night trading in Newcastle, Australia, which found fewer than 10% of assault reports originated with premises [36]. Service delivery effects are unlikely to confound the association of the intervention with hospitalizations, as admissions are less discretionary, and no changes in admission practices during the study period were identified except in short-stay emergency department discharges, which we excluded. The use of proportions of assaults occurring at night as the primary measure, rather than incidence of night-time assaults, provides some control for potential confounders that affect all assaults.

A second design weakness is that neither outcome is alcohol-specific. We rely on restriction to periods of high alcohol involvement for inference about change in alcohol-related assaults, resulting in the inclusion of some assaults that did not involve alcohol, underestimating the magnitude of change.

The sensitivity of our two indicators is likely to differ. Hospitalization will be a more sensitive indicator of injury due to assault, as the severity of injury has met a threshold and admission becomes less discretionary as severity increases [37]. However, it may not be a sensitive indicator of overall assault incidence. The sensitivity of police data for identifying night-time assaults is not known and many assaults may not come to attention, as both perpetrators and victims may be wary of police involvement. However, unless the sensitivity changed at the time of the restrictions this should not bias estimates. The assessment of the alcohol environment from 2013 to 2015 [17] did not find any change in perceived enforcement, but this does not rule out transient changes. The use of so-called 'high alcohol hours' for assessing changes in assault incidence was examined in a recent study of Queensland police data, which concluded that a time-series based on the time-of-day of assaults would be less prone to bias than reliance on police attributions of alcohol involvement [38].

Greater reduction in hospitalizations than police-documented assaults would be consistent with both reduced incidence and reduced severity of assaults, due to lower levels of intoxication in risky environments [39]. The number of assaults coming to the attention of police may be less affected by reduction in severity of injuries.

There were other limitations of using routinely collected data. In this study we were able to estimate hospitalizations by age group but not socio-economic status, which would also be relevant to policy. The police data did not provide us with any demographics of perpetrators or victims of violence at high alcohol hours. Availability of data also constrained statistical power. For example, we had a short post-intervention period in the hospitalization analysis which limited the precision of the IRR estimates, and the lack of a detectable gradual effect in the time-series analysis may have reflected inadequate power.

This study contributes to a small but growing body of research examining the effects of restrictions in trading hours on the incidence of alcohol-related assault. Consistent findings in two independent analyses, the plausible age-specificity of the reduction in hospitalized assaults, the sensitivity analyses and failed falsification tests increase confidence in the conclusions. The extent to which total trading hours were reduced is unclear, but only the small proportion of on- and off-licence premises that had been trading very late at night were directly affected. Concerns about displacement of late-night purchasing to other locations did not arise, as they do in many settings, because the changes were population-wide, but without robust controls the findings must be interpreted with caution.

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Declaration of interests

None.

Author contributions

Jennie Connor: Conceptualization; funding acquisition; investigation; methodology; project administration; supervision; visualization. Brett MacLennan: Conceptualization; funding acquisition; investigation; methodology; project administration. Taisia Huckle: Data curation; investigation; methodology. Jose Romeo: Data curation; formal analysis; methodology; validation; visualization. Gabrielle Davie: Data curation; formal analysis; methodology; validation; visualization. Kypros Kypri: Conceptualization; funding acquisition; investigation; methodology; project administration; supervision; visualization.

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

9 October 2020

Draft Local Alcohol Policy 2020 Submissions
Democracy & Governance
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 Te Hiringa Hauora/Health Promotion Agency to comment on the Palmerston North City Council revised draft Local Alcohol Policy 2020 (LAP).

Te Hiringa Hauora wishes to speak to this submission.

Te Hiringa Hauora 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.

Te Hiringa Hauora 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 the general functions of Te Hiringa Hauora
- 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.

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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 minimised¹. 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. Te Hīringa Hauora 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. Te Hīringa Hauora 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

Te Hīringa Hauora 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 trading hours and levels of harm^{2,3} with substantial increases in assaults for every additional hour of

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

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

³ 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.

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trading and vice versa⁴. 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^{5,6}.

In our submission at the end of 2019 we supported a 2am maximum trading hour but we note that in the revised policy it has been extended to 3am for hotels and taverns with a one-way door policy from 2am. Te Hīringa Hauora would recommend reducing trading hours over the implementation of a one-way door policy, as there is little evidence to suggest that one-way door policies are likely to reduce levels of alcohol-related harm⁷. Our other concern with the revised on-licence trading hours policy is that late opening premises has been widened to all hotels and taverns, instead of only those "on a site in the inner, outer, fringe or local business zone or industrial zone". This will increase the number of late operating premises, which in turn is likely to increase levels of alcohol-related in the town centre and potentially in residential areas as well.

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 consumers⁸. There are also suggestions from recent research that limiting off-licence trading hours after 9pm may reduce harm^{9,10}.

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/10pm¹¹. Te Hīringa Hauora 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

Te Hīringa Hauora 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.

⁴ 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.

⁵ 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

⁶ 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.

⁷ Kypri, K., McElduff, P., and Miller, P. (2014), *Restrictions in pub closing times and lockouts in Newcastle, Australia five years on*. *Drug and Alcohol Review*, 33, 323-326.

⁸ 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

⁹ Sherk 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.

¹⁰ 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.

¹¹ Jackson, N. (2016). A review of Territorial Authority progress towards Local Alcohol Policy development. Auckland: Alcohol Healthwatch

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Recommendation

1. That on-licence hours are kept as per the 2019 version of the draft LAP

DENSITY PROVISIONS

Te Hīringa Hauora notes that the draft policy has no provision relating to the number/density of outlets. The overwhelming majority of New Zealand^{12,13} and international studies¹⁴ 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 association¹⁵.

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 status¹⁶. However, Babor et al¹⁷ 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 incidents¹⁸.

Off-licence premises

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 times¹⁹ 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^{20,21} linked to high density of off-licences. One study

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

¹³ 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.

¹⁴ 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.

¹⁵ 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.

¹⁶ 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.

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

¹⁸ 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

¹⁹ 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.

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

²¹ 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.

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has suggested that for off-licences, the amount of alcohol sold is a more significant factor than outlet density²².

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 accidents²³.

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. As stated in our submission last year, we continue to 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

Te Hīringa Hauora notes that the revised 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 sold²⁴. 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, Te Hīringa Hauora 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 in its revised policy.

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

²² 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.

²³ 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.

²⁴ 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.

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facilities, alcohol treatment centres, Marae, community facilities, high crime areas and high deprivation areas.

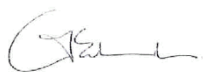
Recommendation

3. Te Hiringa Hauora 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 revised Palmerston North draft LAP. Please do not hesitate to contact Cathy Bruce, Principal Advisor Local Government, e-mail 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

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7 October 2020

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

Email: submission@pncc.govt.nz

SUBMISSION ON THE PALMERSTON NORTH REVISED DRAFT LOCAL ALCOHOL POLICY

Summary

1. General Distributors Limited ("**GDL**") welcomes the opportunity to submit on the Palmerston North Draft Local Alcohol Policy ("**Revised Draft LAP**") published in August 2020. As an off-licence holder within the Palmerston North District, GDL has an interest in the matters raised in the Revised Draft LAP.
2. GDL generally supports the objectives of the Revised Draft LAP to minimise the harm caused by excessive or inappropriate consumption of alcohol in the Palmerston North community. However, GDL opposes the proposed trading hours for off-licences in the Revised Draft LAP.
3. GDL considers that the Palmerston North City Council ("**PNCC**") has not provided robust or sufficient evidence to support the further reduction in trading hours for supermarkets to 7am to 9pm. There is a lack of evidence linking supermarket maximum trading hours to alcohol related harm.
4. Case law on other provisional local alcohol policies shows that Councils need to give reasons for the policies contained in local alcohol policies. Evidence is necessary to demonstrate that different hours would minimise alcohol-related harm, in order for a reduction in trading hours to be reasonable. GDL does not consider that PNCC has provided sufficient evidence in this regard, or that the reasons given in the Revised Draft LAP are reasonable or robust.
5. GDL's reasons for this submission are set out in further detail below.

GDL

6. 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.
7. As an off-licence holder, GDL is committed to being a responsible retailer of alcohol, and supports the object of the 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.

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8. In the Palmerston North district, GDL holds four off-licences:
- (a) Countdown Broadway, which has licensed hours of 7am to 11pm.
 - (b) Countdown Rangitikei Street, which has licensed hours of 7am to 11pm.
 - (c) Countdown Palmerston North, which has licensed hours of 7am to 11pm.
 - (d) Countdown Kelvin Grove, which has licensed hours of 7am to 10pm.

Background

9. The PNCC consulted on an earlier draft LAP between 26 October and 13 December 2019 ("**Original Draft LAP**"). When developing the Original Draft LAP, Council officers prepared a comprehensive research report ("**Research Report**"), which provided information and evidence to support analysis of the issues, and to provide a justification for the proposed elements of the Original Draft LAP.¹
10. The Original Draft LAP proposed to restrict off-licence trading hours from 7am to 10pm. GDL made a submission in support of the Original Draft LAP on 10 November 2019. That submission supported the proposed trading hours for off-licence holders of 7am to 10pm.
11. Following the processing of submissions, and Council deliberations in August 2020, PNCC decided to revise the Original Draft LAP and conduct this further round of consultation with the public. The Revised Draft LAP proposed to further reduce trading hours for off-licence holders, with a closing hour of 9pm.

Off-licence hours

12. The Revised Draft LAP proposes to restrict the trading hours for off-licences to 7am to 9pm on Monday to Sunday across the entire Palmerston North District. This reduces the default trading hours under the Act by two hours.
13. The proposed reduction in hours will have a significant impact on GDL's operations.
- (a) Two of GDL's stores, Countdown Kelvin Grove and Countdown Palmerston North, already have reduced trading hours (of 7am to 10pm) despite their licence conditions and maximum trading hours allowed under the Act. Under the Revised Draft LAP, these stores will each lose one hour of trading per day.
 - (b) Countdown Broadway and Countdown Rangitikei Street currently have trading hours of 7am to 11pm. Under the Revised Draft LAP, these stores will each lose two hours of trading per day.
14. This results in a total loss of six trading hours for the sale of alcohol from Countdown stores within the Palmerston North area. Parliament considers 11pm closing hours for off-licences to be consistent with the purpose and objectives of the Act, otherwise those hours would not have been adopted as the default hours. While GDL supports the Act's national default off-licence hours (ie 7am to 11pm), and GDL did not oppose the Original Draft LAP's proposed maximum trading hours of 7am to 10pm, GDL considers that PNCC has not provided sufficient evidence to support the imposition of these further reduced hours from what was proposed in the Original Draft LAP.

¹ Palmerston North City Council, Local Alcohol Policy 2020 Research Report.

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Legal test

15. A provisional local alcohol policy should contain the reasons for its policies.² In respect of reducing trading hours in particular, decisions of the Alcohol Regulatory and Licensing Authority ("ARLA") and the High Court have been clear that an evidential basis is required. The Authority has previously held that even where there is admitted alcohol-related harm in an area, evidence is necessary to demonstrate that different hours would minimise alcohol-related harm in order for an element reducing trading hours to be reasonable.³
16. Recently, in relation to the Auckland Provisional Local Alcohol Policy ("PLAP") (which proposed to reduce the maximum off licence trading hours to 9pm), the High Court held that ARLA failed to provide reasons, either explicitly or inferentially, for its conclusion that the reduction in trading hours was not unreasonable.⁴ The High Court highlighted that:
- (a) none of the submissions or evidence in support of reduced closing hours, to which ARLA refers, differentiates between the harm caused by supermarket and grocery store off-licences compared to bottle store off-licences;⁵
 - (b) it was not clear from the evidence why supermarkets and their customers should be subject to reduced closing hours;⁶
 - (c) supermarkets and grocery stores are not self-evidently associated with displays of excessive alcohol consumption or alcohol related harm, nor are those features generally associated with their customers;⁷
 - (d) the evidence that purported to link alcohol related criminal offending with off-licence trading hours was either non-existent or at best weak;⁸
 - (e) no consideration was given to other factors that may cause alcohol related harm like violent and disorderly behaviour offences, for example on-licence trading hours;⁹ and
 - (f) ARLA did not provide a reason why it thought the evidence provided supported a blanket restriction on off-licence closing hours throughout the entire Auckland region.¹⁰
17. These cases clearly show that it is important that clear reasons backed by evidence are given for reducing liquor trading hours in their area.

No evidence

18. The Research Report was prepared to provide an evidential basis to support the development of the PNCC Local Alcohol Policy, including reducing the off-licence trading hours in the Original Draft LAP. The Revised Draft LAP explains that the more restrictive

² *Foodstuffs South Island Limited v Dunedin City Council* [2017] NZARLA 21 at [23].

³ *Progressive Enterprises Ltd v Far North District Council* [2018] NZARLA 31 at [97].

⁴ *Woolworths New Zealand Ltd v Alcohol Regulatory and Licensing Authority* [2020] NZHC 293 (Auckland) at [205].

⁵ *Woolworths New Zealand Ltd v Alcohol Regulatory and Licensing Authority* [2020] NZHC 293 (Auckland) at [96] and [108].

⁶ *Woolworths New Zealand Ltd v Alcohol Regulatory and Licensing Authority* [2020] NZHC 293 (Auckland) at [96].

⁷ *Woolworths New Zealand Ltd v Alcohol Regulatory and Licensing Authority* [2020] NZHC 293 (Auckland) at [112].

⁸ *Woolworths New Zealand Ltd v Alcohol Regulatory and Licensing Authority* [2020] NZHC 293 (Auckland) at [106].

⁹ *Woolworths New Zealand Ltd v Alcohol Regulatory and Licensing Authority* [2020] NZHC 293 (Auckland) at [107].

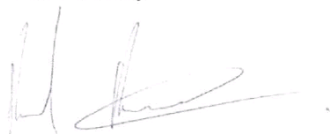
¹⁰ *Woolworths New Zealand Ltd v Alcohol Regulatory and Licensing Authority* [2020] NZHC 293 (Auckland) at [109].

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maximum trading hours are largely in response to concerns raised by submitters on the Original Draft LAP.¹¹ Some submitters questioned the validity of reducing trading hours across all licensed premises, as they believe pre-loading is primarily caused by accessibility to alcohol from off-licensed premises.¹²

19. Data provided in the Research Report on pre-loading shows that:
- (a) 79% of respondents who reported pre-loading purchased the alcohol they drank from a liquor store before going out. In contrast, only 35% of respondents of respondents who reported pre-loading purchased their alcohol from a supermarket.¹³
 - (b) 80% of respondents said they usually start drinking before going out on a typical night prior to 9pm.¹⁴ This data implies that most people have already purchased their alcohol to consume prior to 9pm. Therefore, reducing the maximum trading hours of supermarkets to 9.00pm will not significantly reduce the impact of pre-loading in Palmerston North.
20. The Research Report does not support a further reduction in the maximum trading hours of supermarkets to 9pm. The Revised Draft LAP also does not differentiate between different types of off-licence holders. Supermarkets and grocery stores are restricted to selling beverages with a lower alcohol content compared to liquor stores. As shown by the statistics in the research report, people who pre-load are far more likely to purchase alcohol for pre-loading from a liquor store.¹⁵ There appears to have been no consideration to these differing factors, by imposing a blanket reduction of trading time on all off-licence holders.
- Conclusion**
21. While GDL supports the objectives of the Revised Draft LAP to minimise the harm caused by excessive or inappropriate consumption of alcohol in the Palmerston North community, GDL is opposed to the reduction in off-licence maximum trading hours to 7am to 9pm.
22. GDL wishes to be heard in relation to its submission.

Yours faithfully



Paul Radich
National Alcohol Responsibility Manager
Woolworths New Zealand

¹¹ Palmerston North City Council, Draft Local Alcohol Policy 2020 (August 2020) at p 24.
¹² Palmerston North City Council, Draft Local Alcohol Policy 2020 (August 2020) at p 24.
¹³ Palmerston North City Council, Local Alcohol Policy 2020 Research Report at p 41.
¹⁴ Palmerston North City Council, Local Alcohol Policy 2020 Research Report at p 42.
¹⁵ Palmerston North City Council, Local Alcohol Policy 2020 Research Report at p 41.

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Name of the organisation you represent: Foodstuffs North Island Limited

Address: Suite 1, 60 Roma Road, Mount Roskill, Auckland

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

Issuing further licences:

The Council is not proposing to include restrictions on whether to issue further licences.

- I support this

Comments:

We support the Council's decision not to restrict the number of licences issued within the Palmerston North City territorial area.

Trading hours:

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm; and for club licensed premises (such as sports clubs and RSAs) to 8am to 12am the next day.

- I oppose this

Comments:

Foodstuffs believes that the maximum licensed hours for supermarket and grocery stores should be 7am-11pm. Although Foodstuffs' stores within the Palmerston North City territorial area do not currently operate past 10pm many of our stores in the region have longer licensed trading hours than actual opening hours to accommodate customers queuing at checkouts around closing time and to allow for flexibility of trading hours, if required.

Hours:

We set out below for your reference the usual store trading hours and the permitted liquor licence trading hours for our stores in your region.

Store	Store trading hours (weekdays' maximum)		Store permitted liquor licence hours	
Four Square Ashhurst Village	7am	8pm	7am	10pm
Four Square Awapuni	7am	8pm	7am	10pm
Four Square Cloverlea	7.30am	9pm	7am	10pm

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Four Square Hokowhitu	7am	8pm	7am	10pm
Four Square Super Seven	7am	9pm	7am	10pm
New World Aokautere	7.30am	9pm	7am	10pm
New World Melody's	7am	9pm	7am	11pm
New World Pioneer	7am	10pm	7am	11pm
PAK'nSAVE Palmerston North	8am	10pm	8am	10pm
Gilmours Central	8am	5pm	7am	10pm

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 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 9pm.

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. As demonstrated by recent case law, this allows decision-makers to make tailored decisions based on the likely risk of alcohol-related harm caused by an off-licence's trading hours and balancing considerations such as the locality of the off-licence, deprivation in the area, suitability of the applicant and systems, staff and training. 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.

We note that the 'Local alcohol policy research report' confirms at page 22 that total sales from all off-licenced premises in Palmerston North between 8pm and 11pm are *lower* than the national average. The recent High Court decision relating to the Auckland Provisional Local Alcohol Policy has confirmed that the default maximum trading hours provisions in the Act are reasonable on a national level, being what Parliament considered will generally achieve the Act's purpose and object, and that therefore there needs to be relevant local evidence that justifies departing from the provisions in the Act. In addition,

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the information provided categorises off-licence purchases into those between 8pm–10pm and 10pm–11pm, rather than relating to the period actually targeted by the draft LAP (9pm–11pm). We note that the purpose of the maximum trading hours provisions is not to simply target *more* consumers of alcohol generally with a reduction in trading hours, but to target those who consume alcohol inappropriately or to excess.

We believe that the Council should consider the likelihood of harm being caused by the differing types of premises with respect to the maximum trading hours. This is significant as the High Court in its recent decision relating to the Auckland Provisional Local Alcohol Policy noted that the quality of the evidence before it relevant to linking alcohol-related harm with off-licence trading hours was sparse and failed to *distinguish between different types of off-licences*. Most sales of alcohol from our supermarkets and grocery stores occur when a customer is purchasing alcohol as part of a wider grocery shop. Those purchases are unlikely to be connected to excessive or inappropriate consumption. In addition, 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, and therefore exposure to, alcohol in the store to a particular defined area. Foodstuffs considers that the limitations on the types of alcohol able to be purchased and the systems and training in place for its stores is particularly relevant with respect to pre-loading, as products with a lower percentage of alcohol by volume are less likely to lead to excessive or inappropriate consumption and staff are well trained to prevent sales to intoxicated persons. We also note that the information provided in the 2013 study commissioned by ACC (at pages 41–42 of the research report) suggests that the majority of respondents purchased alcohol from bottle stores as opposed to supermarkets or grocery stores and began 'pre-loading' prior to 9pm on a typical night.

Foodstuffs recognises that we currently do not have any stores in the Palmerston North City territorial area generally operating beyond 10pm. However, a number of our stores currently close at either 9pm or 10pm and some have longer licensed trading hours to accommodate customers queueing at checkouts around closing time where 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 the relevant deadline, or an extension of their hours during the holiday season to ease the pressure of higher customer demand. Therefore, the default maximum trading hours (7am to 11pm) allow flexibility for operators and avoid customer relationship concerns and decision-makers are well-placed to consider additional tailored discretionary conditions in respect of individual licence applications.

In addition, for the Foodstuffs' stores which operate beyond 9pm, the single alcohol area would need to be roped off each night and customers who have picked up a product prior to 9pm (and the area being roped off) may well not complete their shopping before the 9pm deadline, or get stuck queueing at the checkout, which can cause staff to be subjected to significant negative feedback, additional expense and customer inconvenience. As clarified in the recent High Court decision in relation to the Auckland Provisional Local Alcohol Policy, the Act strikes a balance between allowing safe and responsible consumption of alcohol and minimising the harm caused by excessive or inappropriate consumption. In this way, the Act recognises a freedom to sell, supply or consume alcohol, in a reasonably safe and responsible way, while at the same time recognising a community freedom to take reasonable steps to protect its members from the harms caused by excessive or inappropriate consumption of alcohol.

Location:

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

- I support this

Comments:

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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

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

- No opinion

Comments:

No comment.

Discretionary conditions:

The Council has not included any discretionary conditions in the draft policy.

- I support this

Comments

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:

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.

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 currently the franchisor of 44 PAK'nSAVE, 101 New World, 168 Four Square, and 7 Gilmours stores. Our stores are a major employer in the Palmerston North City territorial area with ten franchised stores. Our stores in the region are as follows:

- Four Square Ashhurst Village
- Four Square Awapuni
- Four Square Cloverlea
- Four Square Hokowhitu
- Four Square Super Seven
- New World Aokautere
- New World Melody's
- New World Pioneer

23-5

- PAK'nSAVE Palmerston North
- Gilmours Central

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.

Foodstuffs' submissions

Foodstuffs appreciates the opportunity to provide feedback on the draft LAP. Foodstuffs commends the Council on producing a draft LAP which seeks to balance the needs of the community, local business and other key stakeholders such as the Police and Medical Officers of Health, who each have differing perspectives and views on alcohol in the community.

24-1

Cancer Society Manawatu Centre Submission to the Palmerston North City Council Draft Alcohol Policy 2020

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)	(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 second-hand 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, Taranaki 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.

24-2

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
5. 'off-licence' liquor outlets tended to be located in areas of high social deprivation and high population density.
6. Socioeconomic position has been reported to be an important determinant of health

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.

24-3

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 have appreciated 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.

PNCC Connected Community Strategy has identified the goal of "working to make it easy for Palmerston North citizens to connect with each other and to the services, infrastructure, facilities, and opportunities that support individual development, health, prosperity and wellbeing, for the greater good of our community as a whole." (3)

Just as the Council recognises the need for sustainable infrastructure planning for the future, Palmerston North City Council also need to consider how policy can positively support and enhance future community health and wellbeing.

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

24-4

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 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).

According to Alcohol Healthwatch (2017) Among women aged between 30 to 44 years, one in five women (22.8%) died younger than expected due to breast cancers attributable to alcohol use (8).

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.

Presently, 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: Location and 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

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 some on-licensed premises (taverns/bars, hotels, and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm, 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 off-licence trading hours proposed by the Local Alcohol Policy 2020.

A key factor in reducing alcohol harm is to reduce consumption via reduced availability of alcohol.

24-5

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" (9). 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 associated problems decrease. Reducing availability can be achieved either through reducing hours of opening, or numbers of retailers (9).*

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" (10).

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 (12), 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. (11).

Cancer Society Manawatu Centre 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." (13).

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. (14)

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:

From an equity point of view, this decision is of real concern.

24-6

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 (15).

Health Promotion Agency (2012) Alcohol NZ investigation into liquor outlets in Manakau City, reported that areas with a high density of liquor outlets relative to other parts of the city were more likely to be sited in Manukau City's more vulnerable communities, that is in areas of high social deprivation and high population density, and concluded that the greater access evident for people in poorer communities may be a mechanism for increasing deprivation and thereby widening gaps in socioeconomic status and health." (16).

In considering the causal relationship between breast cancer and alcohol, the importance of high social deprivation strengthens the call for location restrictions of alcohol outlets. The BMC 2018 study investigated the factors contributing to ethnic disparities in breast cancer survival in New Zealand, and reported that socioeconomic position has been reported to be an important determinant of health. In this study, about half of Māori and Pacific women resided in the most deprived neighbourhoods (cf. 13% of non-Māori non-Pacific women), and Māori and Pacific women had a higher risk of mortality from breast cancer compared to other ethnic groups. (17).

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 proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

Comment: The Cancer Society Manawatu is supportive of the move to include a mandatory one-way door restriction for all on-licensed premises trading past 2am.

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 (18).

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. **

24-7

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 need to be considered from a risk management perspective and all special licence applications need to 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.

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24-9

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25-1

14709864

9th October 2020

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

25-2

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 continuing 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

Our preference for the maximum hours for On-licences is the 2am proposed in the previous draft.

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, but the Health sector's concerns are primarily for public health and safety and the impact on medical systems and their users.

25-3

In light of the consistent evidence demonstrating the impact of on-licence trading hour on alcohol-related harm, the retention of the 3am closing is a missed opportunity.

Off Licences

The proposed reduction in maximum trading hours for Off-licences to 9pm is strongly 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 to the drinker and others, in both public and domestic settings..

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’s 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.

A similar clause regarding proximity of Off licences, while not currently indicated, could future- proof that area and prevent situations where multiple Off licences can establish in close proximity, leading to inevitable price wars and increased availability.

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. We would recommend that the Council develop a monitoring and evaluation plan to ensure that data necessary for assessing the future situation is being appropriately collected and collated.f

Merle Lavin

26-1

14732169

From: Submission
Subject: FW: Draft Local Alcohol Policy 2020 submission

Your contact details**Full name**

Gail campbell

Name of the organisation you represent

Albert sports bar

Privacy**Withhold my contact details**

True

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

No

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.

I support this

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm; 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

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

I support this

Please provide any comments below

26-2

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.
I support this

Please provide any comments below:

Discretionary conditions

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?

14708543

27-1

Merle Lavin**From:**

Submission

Subject:

FW: Draft Local Alcohol Policy 2020 submission

Your contact details**Full name**

GARY WRIGHT

Name of the organisation you represent

FISH BAR LTD

Privacy**Withhold my contact details**

True

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

Yes

Issuing further licences**The Council is not proposing to include restrictions on whether to issue further licences.**

I support this

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm; 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**The Council is not proposing to include any location restrictions in the Local Alcohol Policy.**

I support this

Please provide any comments below

27-2

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I don't know/no opinion

Please provide any comments below:

Discretionary conditions

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

28-1

14708989

From: Submission
Subject: FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name
 GARY WRIGHT

Name of the organisation you represent
 CELTIC INN

Privacy

Withhold my contact details
 True

Hearings

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

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.
 I support this

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm; 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

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

Please provide any comments below

28-2

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I don't know/no opinion

Please provide any comments below:

Discretionary conditions

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**From:**

Submission

Subject:

FW: Draft Local Alcohol Policy 2020 submission

Your contact details**Full name**

GARY WRIGHT

Name of the organisation you represent

PR ATTRACTIONS LTD (BUBBLES BAR)

Privacy**Withhold my contact details**

True

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

Yes

Issuing further licences**The Council is not proposing to include restrictions on whether to issue further licences.**

I support this

Please provide any comments below:

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9pm; 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**The Council is not proposing to include any location restrictions in the Local Alcohol Policy.**

I support this

Please provide any comments below

29-2

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I don't know/no opinion

Please provide any comments below:

Discretionary conditions

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?

30-1

14708759



Submission on the Palmerston North City Council Draft Local Alcohol Policy

October 9, 2020

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

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Introduction

1. Firstly, Alcohol Healthwatch commends 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 Report¹ 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 2012,² 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,^{3,4} residents deserve the strongest protections available from its range of harms.

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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,^{5,6,7} and experience higher levels of both acute and chronic health harm from alcohol.^{8,9} Research on premature deaths and disability attributable to alcohol has shown that alcohol-related mortality in Māori was double that of non-Māori in 2007.⁵
8. Young Māori males (15-24 years) have been shown to have disproportionately higher risks of hazardous drinking from living close to licensed outlets¹⁰ 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.¹¹
9. As noted in the Local Alcohol Policy Research Report,¹ 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,¹² it is a hard ask for Territorial Authorities to create a paradigm shift in the local drinking culture.
11. One particular approach to reducing alcohol harm at a local level is known as the Cardiff Model for Violence Prevention. The Cardiff Model is based on Cardiff's experience of establishing a multi-agency violence prevention group comprising representatives of local government, police, licensing regulators and an emergency department consultant. The group later grew to include representatives from education, transport, ambulance, and local licensees. Key to the partnership was the sharing of anonymised data from emergency departments on violence location, time, weapons, and number of assailants. Crime analysts combine and summarise Police and ED data to identify areas and times of violence concentrations. Combined information then informs strategies designed to address specific risks and patterns observed in the data.¹³
12. Evaluation of the Cardiff Model found the information sharing partnership between health services, police and local government altered policing and other strategies to prevent violence. This led to a significant reduction of violent injury and was associated with an increase in police recording of minor assaults compared to similar cities in England and Wales.¹³
13. The Cardiff Model has been widely adopted in British cities, and has also been replicated in Amsterdam, Atlanta, Philadelphia, and Wisconsin.¹⁴ Australian researchers have also commenced a multi-site trial using shared anonymised emergency department data to reduce alcohol harm.¹⁵ Alcohol Healthwatch recommends local leaders consider whether such an approach may be useful to respond to concerns around alcohol related violence and disorder in Palmerston North.

Local Alcohol Policies within the context of a global health pandemic (COVID-19)

14. It is clear that the global pandemic has had an immediate impact on alcohol consumption in New Zealand, and that it represents a picture of both good news and bad news.
15. Health Promotion Agency research¹⁶ found that 19% of New Zealanders (who had consumed alcohol in the past four weeks) reported increasing their alcohol use during

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Level 4 lockdown, when compared to consumption patterns pre-lockdown. Almost one-half of drinkers (47%) had consumed the usual amount, and 34% had consumed less (Figure 1). Although these findings are from a national study, we see no reason why they may not apply to residents in the Palmerston North area.

16. Post lockdown, the proportion of drinkers that had increased their consumption reduced from 19% in Level 4 to 14% in Level 1, while the proportion drinking less reduced from 34% to 22% (Figure 1).

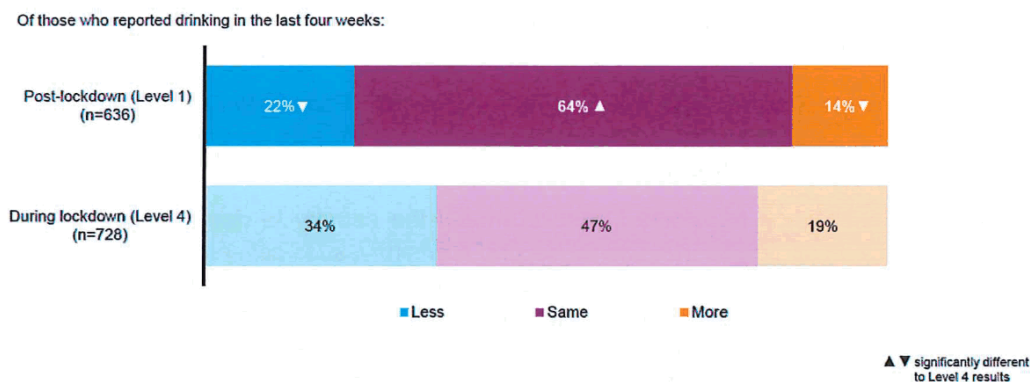


Figure 1. Changes in drinking during Level 4 lockdown and Level 1 of the COVID-19 pandemic.

17. When looking at changes in the average amount of alcohol consumed per week during Level 4 lockdown, results show an increase (from 12.82 standard drinks per week pre-lockdown to 14.09 drinks during Level 4). This reduced to 13.47 drinks per week in Level 1. This finding points towards the reduced intake by many New Zealanders not offsetting the increased volume of alcohol consumed by those who increased their consumption. It is likely that heavy drinkers consumed even more, whilst low-risk drinkers consumed slightly less.
18. It is imperative that we do everything we can to support New Zealanders who have maintained lower levels of drinking during, and after, Level 4 lockdown. This is the 'good news' of alcohol use during the global pandemic.
19. Findings by ethnicity show that 22% of Māori drinkers increased their consumption in Level 4 lockdown, when compared to pre-lockdown. This prevalence did not decrease following the cease of Level 4 lockdown, with 22% reporting higher consumption in Level 1 when compared to pre-lockdown (Figure 2). This has important implications for minimising alcohol harm among Māori in Palmerston North and upholding our Treaty obligations to promote and protect the health of Māori.
20. Among Pasifika drinkers, the proportion that increased their consumption had halved at Level 1, from 20% in Level 4 lockdown to 10% in Level 1.¹⁶ Therefore, there remain significant inequities by ethnicity in post-lockdown drinking.

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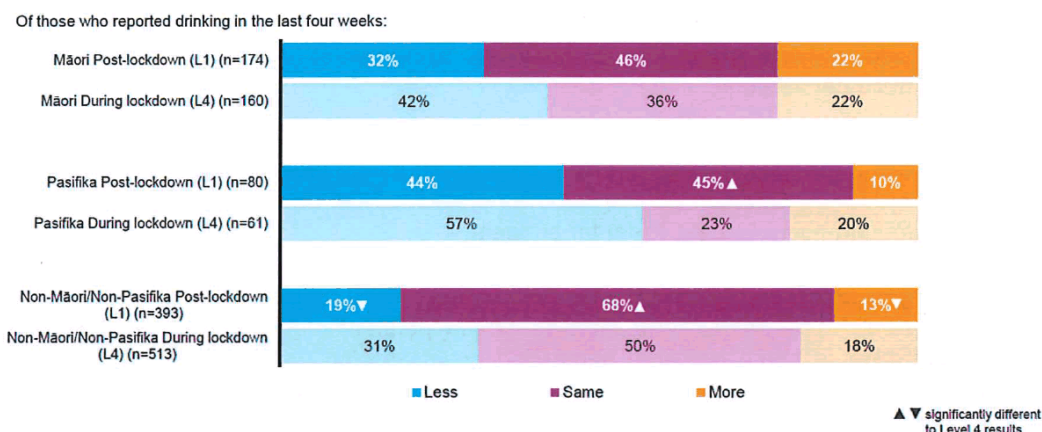


Figure 2. Changes in drinking during Level 4 lockdown and Level 1 of the COVID-19 pandemic, by ethnicity.

21. Age differences in drinking during and post-lockdown were striking. It is clear that a higher proportion of 18-24 year olds reduced their consumption during Level 4 lockdown, when compared to other age groups. However, as Figure 3 shows, the proportion of young adults that increased their consumption did not change between Level 4 lockdown (19%) and Level 1 (23%).¹⁶

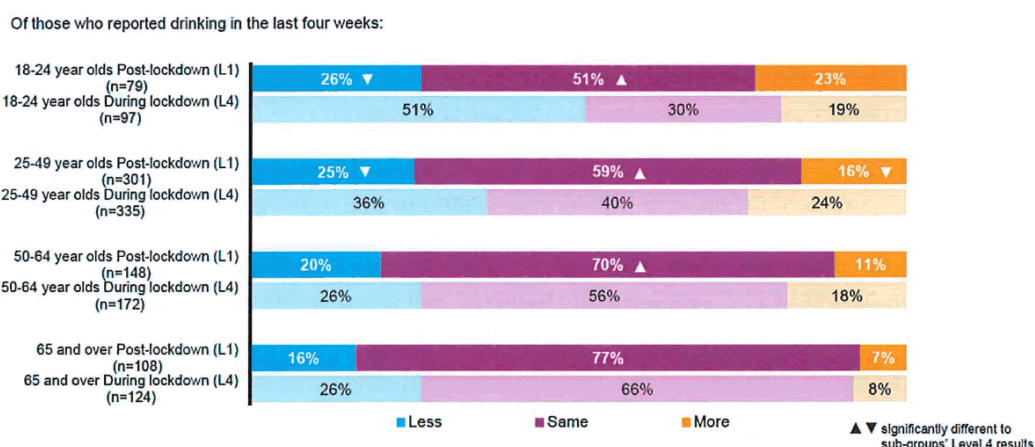


Figure 3. Changes in drinking during Level 4 lockdown and Level 1 of the COVID-19 pandemic, by age group.

22. Across all study participants, reasons given for drinking more included: 1) It helps me relax/switch off, 2) I have been feeling stressed out/anxious, and 3) I have been bored.¹⁶
23. Reasons given for drinking less included: 1) haven't been able to, or haven't wanted to, socialise as much or go out/visit the pub etc., 2) Money/cost, 3) haven't wanted to go out and buy alcohol, 4) Physical health reasons (e.g. weight, health condition, to be healthier), and 5) The lockdown period was a good time to reduce how much I drink and I want to continue drinking less.¹⁶
24. We suggest that the context of the global pandemic warrants additional considerations in relation to alcohol licensing decisions and local alcohol policy development. A Local Alcohol Policy can play a significant role in minimising alcohol harm, particularly among those who have increased their consumption during the pandemic.

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25. Previous public health and economic crises inform the predictions of alcohol use going forward. Researchers propose that the COVID-19 pandemic will influence consumption via two main pathways:¹⁷
 - (a) *increase consumption*: due to psychological distress triggered by financial difficulties, social isolation and uncertainty about the future
 - (b) *reduce consumption*: due to income reductions from unemployment and reduced working hours leading to tighter budgets.
26. It is suggested that some impacts will be immediate, whilst others will occur over a longer time period.¹⁷ The longer term impacts of the pandemic are believed to include a normalisation of home drinking, reinforcing or introducing drinking as a way to self-medicate symptoms of stress, anxiety, and boredom and increased prevalence of alcohol dependence.¹⁸⁻²¹
27. Many people will use alcohol to cope with the on-going impacts of the pandemic. Research shows that individuals who drink for coping reasons are at a heightened risk of developing problems with alcohol.²² Depression and anxiety have been found to be associated with drinking to cope.²²
28. A cross-sectional study in Australia found that depression and anxiety were associated with increased alcohol consumption during the first few months of COVID-19 pandemic.^{23,24}
29. Factors such as unemployment and time spent unemployed may also play a role in increased alcohol harm, in addition to redundancies and job losses leading to increased workloads for others and reduced workplace morale.²⁵
30. Alcohol use has always played a role in New Zealand's reduced productivity and unemployment levels, and is inversely related to economic growth. At a time when New Zealand needs full employment and maximum productivity, we need to take alcohol control measures that effectively reduce harm. Persons trapped in the mire of unemployment and debt are likely to have heightened vulnerability to developing new, or exacerbating existing, alcohol and related problems.²⁵
31. Increases in alcohol use are likely to lead to a long-term increase in newly diagnosed patients with alcohol use disorders.²⁶
32. At a time when New Zealanders are likely to feel anxious, stressed and vulnerable, efforts should encourage measures that limit alcohol, not facilitate it.²⁷ The World Health Organisation advises that restrictions on access to alcohol should be upheld or even reinforced during the pandemic.²⁸
33. We propose that the effects of the pandemic will cast a shadow over the entire period that the Local Alcohol Policy is in force. The Local Alcohol Policy has the potential to minimise any additional alcohol harm created by the pandemic, and thus improve community well-being. The Local Alcohol Policy needs to especially consider those vulnerable to harm, as any benefits of coming out of recession will not be felt equally across all demographic groups in society.
34. A particular issue in New Zealand has been the expansion of bottle store off-licences selling alcohol online. It has been argued that, in Australia, the licensing system has not kept pace with the changes in the market, and that online sales operate under much lower levels of scrutiny than the traditional bricks and mortar store.²⁹

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35. In New Zealand, we witnessed an overnight increase in bottle stores selling online during Level 4. However, there remains a lack of knowledge regarding who is selling online as off-licences have the default ability to sell in a physical shop as well as online. Compliance is therefore impossible, as there appears to be no list of online sellers (apart from those with a S40 remote sales licence).
36. We **recommend** measures are put in place to ensure that Council is aware of all premises in the district selling online, so that monitoring and compliance activities can be effectively carried out.
37. Finally, should a community outbreak reappear, or another pandemic hit our shores, we should now be putting everything in place to protect and maximise public health in the future. Prevention is better than cure.
38. Certainly, alcohol use places a major burden on health care.³⁰ Reducing the harm from alcohol will reduce any future burden on the health services.
39. In relation to COVID-19, alcohol is an immunosuppressant and increases acute respiratory distress syndrome via multiple pathways.^{31,32} Alcohol use disorders need to be considered as a predictor for COVID-19 disease severity and Intensive Care Unit admission.³¹

Prevalence of alcohol health harm in the Palmerston North area

40. The LAP proposal notes that a key objective of the policy is to minimise the harm of excessive and inappropriate drinking.
41. Alcohol health harm data sourced from the publicly-available dataset Healthspace (available at <https://healthspace.ac.nz/health-topics/alcohol-related-harm/>) indicates the level of alcohol harm among residents of the Palmerston North City Council region.
42. Data on wholly alcohol-attributable hospital admissions is available at the level of the Territorial Authority. Six indicators provide a snapshot of this harm:
 - Total (age-standardised rate per 100,000), excluding Emergency Department visits (3-year moving average 2016-2018)
 - Total (age-standardised rate per 100,000), 3-year moving average 2016-2018
 - Females (age-standardised rate per 100,000), 5-year moving average 2014-2018)
 - Males (age-standardised rate per 100,000), 5-year moving average 2014-2018)
 - Alcohol intoxication related conditions (age-standardised rate per 100,000), 6-year moving average 2013-2018)
 - Chronic drinking related conditions (age-standardised rate per 100,000), 6-year moving average 2013-2018)
43. Each of these indicators are described below. Unfortunately, alcohol consumption data from the New Zealand Health Survey is only available at the DHB-level and therefore not specific to the Palmerston North area.

Total (age-standardised rate per 100,000), excluding Emergency Department visits (3-year moving average 2016-2018)

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44. As shown in Figure 4, the overall rate of admissions in Palmerston North falls below the New Zealand average. There does appear to an increasing trend over time (Palmerston North is shown in the purple line).

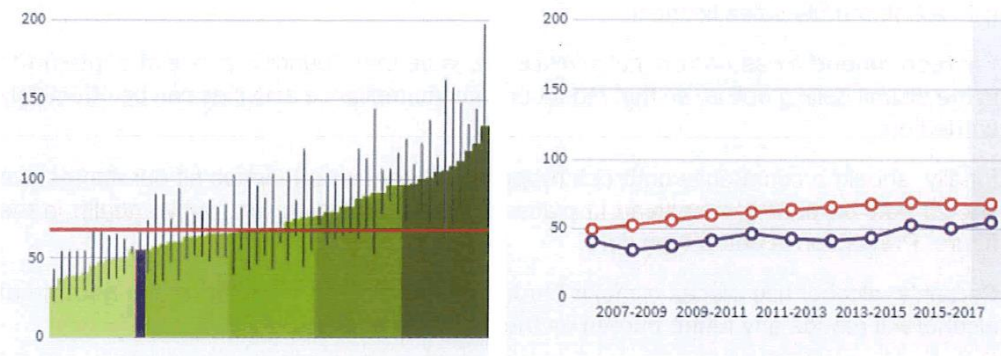


Figure 4. Left: Total (age-standardised rate per 100,000), excluding Emergency Department visits (3-year moving average 2016-2018). Right: Trends over time (New Zealand vs Palmerston North).

Total (age-standardised rate per 100,000), 3-year moving average 2016-2018

45. As Figure 5 shows below, a similar trend emerges for admissions that include Emergency Department visits. Again, Palmerston North is shown in purple.

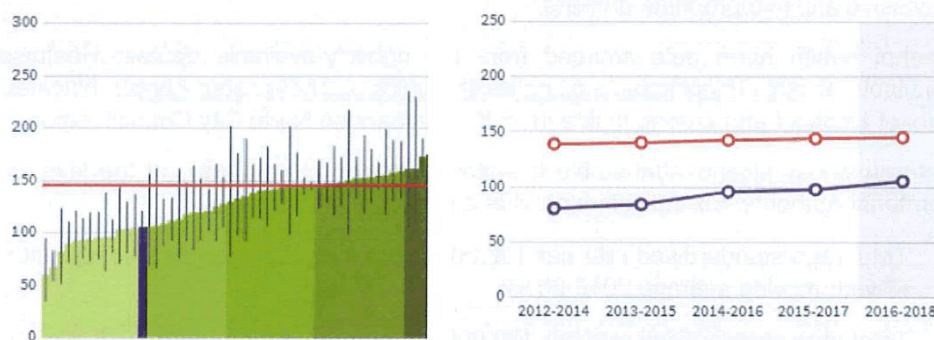


Figure 5. Left: Total (age-standardised rate per 100,000), 3-year moving average 2016-2018. Right: Trends over time (New Zealand vs Palmerston North).

Females (age-standardised rate per 100,000), 5-year moving average 2014-2018)

46. Among all females in the district, Figure 6 below shows a lower than national average rate for admissions. Although increasing in recent years (in purple).

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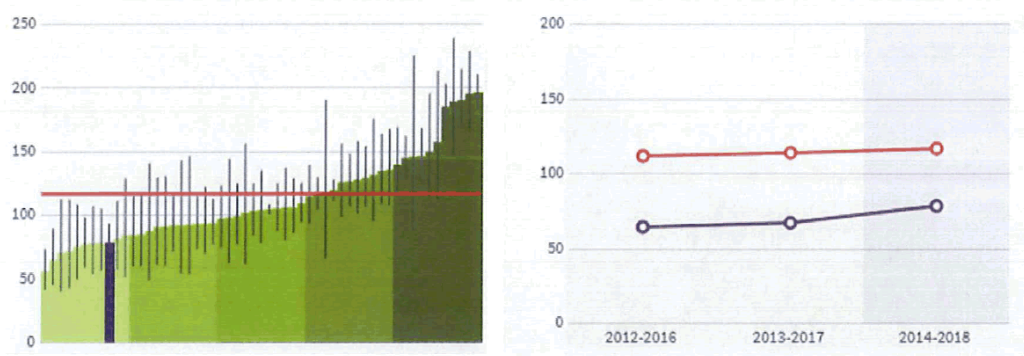


Figure 6. Left: Females (age-standardised rate per 100,000), 5-year moving average 2014-2018). Right: Trends over time (New Zealand vs Palmerston North).

Males (age-standardised rate per 100,000), 5-year moving average 2014-2018)

47. As Figure 7 shows, males in Palmerston North have a lower admission rate than the national average (shown in purple).

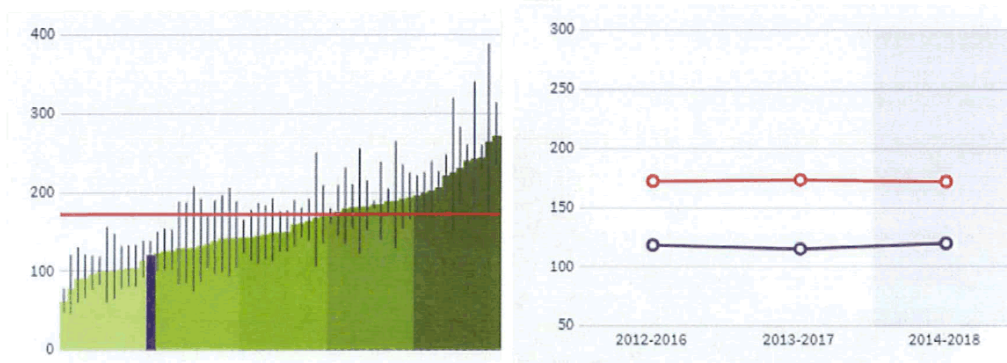


Figure 7. Left: Males (age-standardised rate per 100,000), 5-year moving average 2014-2018). Right: Trends over time (New Zealand vs Palmerston North).

Alcohol intoxication related conditions (age-standardised rate per 100,000), 6-year moving average 2013-2018)

48. As Figure 8 shows, admissions for alcohol intoxication among all residents in Palmerston North is lower than the national average, with little change over time (purple line).

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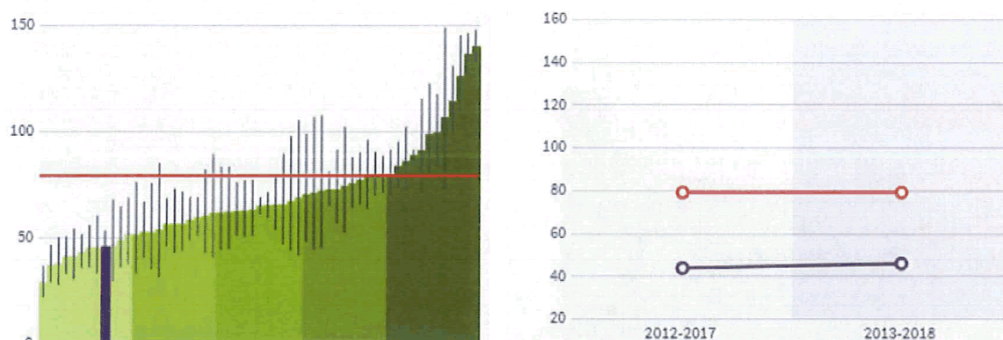


Figure 8. Left: Alcohol intoxication related conditions (age-standardised rate per 100,000), 6-year moving average 2013-2018). Right: Trends over time (New Zealand vs Palmerston North).

Chronic drinking related conditions (age-standardised rate per 100,000), 6-year moving average 2013-2018)

49. As Figure 9 shows, admissions for chronic drinking related conditions among all residents in Palmerston North is lower than the national average, with a slight increase over time (purple line).

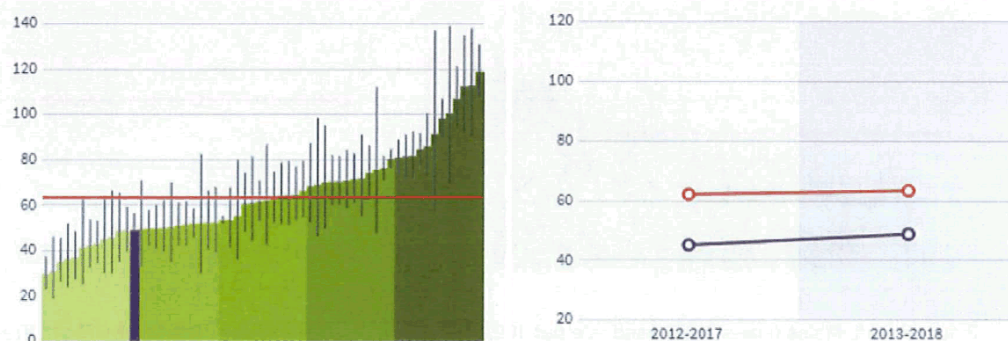


Figure 9. Left: Chronic drinking related conditions (age-standardised rate per 100,000), 6-year moving average 2013-2018). Right: Trends over time (New Zealand vs Palmerston North).

50. In general, there appears to be a lower than average admission rate for wholly alcohol-attributable conditions among residents of Palmerston North. There is some evidence of indicators worsening over time.
51. It is important to note that the data provided masks differences by age, ethnicity, sex and level of socio-economic deprivation. Inequities in harm will certainly be masked in the presentation of overall figures. The admission data also excludes partially alcohol attributable admissions, such as cancer.
52. Alcohol Healthwatch believes that no Council nor community is immune from alcohol harm. The national average represents a high level of harm across the country and so any comparisons need to take that into consideration.

Sensitive sites

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53. 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").
54. 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.
55. Alcohol Healthwatch **recommend** that consideration be given to decisions on new licences intending to locate within at least 100m of sensitive sites. The Horowhenua District Council Local Alcohol Policy³³ prohibits the issue of new bottles stores within 100m of sensitive sites.
56. Alcohol Healthwatch 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.
57. 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.

On-licence hours

58. 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.^{34,35} 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.
59. Alcohol Healthwatch **supports** the opening and closing hours (for all licence types) being listed as separate elements in the LAP. We believe this approach to trading hours in LAPs reduces the potential for appeals to the entire element.
60. Alcohol Healthwatch **does not support** the proposed maximum closing hour of 3am for on-licences in Palmerston North (Hotels, Taverns and Class 1 Restaurants). We generally support the proposed maximum closing hour of 1am for other licensed premises including restaurants and cafes, function centres, cinemas, and theatres.
61. Alcohol Healthwatch **supported** the previous 2019 Draft LAP proposal of a 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 recognised that a 2am closing represented a restriction to current trading hours in Palmerston North City.
62. Alcohol Healthwatch **strongly believes** that an earlier closing hour affords more protection than a later trading hour with a one-way door restriction. This is because of the risks associated with excessive drinking and higher blood alcohol concentrations at later hours (especially in the presence of consumer's pre-loading). Earlier closing hours in Australia were found to result in patrons coming into town earlier.³⁶ Fatigue is also a particular concern with regards to drink driving.

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63. Alcohol Healthwatch also **recommended** Council consider an *earlier closing hour of 1am* in the zones identified for a 2am closing in the 2019 Draft LAP proposal.
64. Alcohol Healthwatch notes the closing hours for on-licences vary by licence type, whereas previous proposals varied by city zone and relative location. We **recommend** that the proposed later closing hours be limited to inner or central locations in Palmerston North, to limit amenity effects in residential areas, with the remainder of Hotel, Tavern, and Class 1 Restaurant licences outside inner or central locations being subject to a maximum closing hour of 1am.
65. Alcohol Healthwatch supports the inclusion of a one-way door policy covering the last hour of on-licence trading.
66. Alcohol Healthwatch **recommends** the inclusion of 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

67. 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. This pattern is consistent with national-level (and international) trends.
68. Off-licences sell approximately 75% of all alcohol in New Zealand (43% from bottle stores, 32% from supermarkets).³⁷ This means a minority of the alcohol sold is consumed in licensed premises or at licensed events, where there must be supervision, control and an expectation of host responsibility.
69. In contrast, the majority of alcohol is purchased (often cheaply) from off-licences, and consumed in situations where there may be little control or supervision, such as private homes or public places.
70. New Zealand research published this year³⁸ shows that 73% of all very heavy drinking occasions occurs in private homes. Around one in every ten heavy drinking occasions occurs in bars.
71. 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.

Trading hours

72. Alcohol Healthwatch **supports** the proposed maximum off-licence closing hour 9pm. We commend Palmerston North for proposing a closing hour two hour earlier than the national default maximum trading hours. This will be a health protecting policy.

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73. However, Alcohol Healthwatch **does not support** the proposed off-licence opening hour of 7am.
74. 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.
75. 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.³⁹ 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.^{40,41}
76. New Zealand research published this year demonstrated the positive impacts of reduced trading hours on young people.⁴² The introduction of the default maximum trading hours in New Zealand in 2013, which saw all bars and clubs close at 4am and no takeaway alcohol sales after 11pm, was found to be associated with a reduction in the number of assault-related hospitalisations by 11 per cent. The decline was the largest among 15 to 29-year-olds (who made up more than half of those hospitalised), at 18 per cent. There was also a reduction in the number of night-time assaults coming to Police attention.
77. While these results point to the role of very late trading hours on alcohol-related harm, we agree with the authors of the study who suggest that further reductions in trading hours could provide many benefits.
78. 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).⁴³
79. Furthermore, in the ARLA decision pertaining to Dunedin Council's Provisional Local Alcohol Policy ([2016] NZARLA PH 21 – 26), it was stated⁴⁴:
- "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."*
80. For these reasons, Alcohol Healthwatch **strongly supports** a closing hour of 9pm being implemented across the region and actively monitored.
81. 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.
82. Core hours for bottle stores and supermarkets in Scotland include an opening hour of 10am,⁴⁵ and although our average consumption is less than the Scots, we see no reason why a similar approach could not be adopted here.
83. 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.
84. Research has documented the association between exposure to alcohol advertising around schools and intentions to use alcohol among very young adolescents.⁴⁶ Exposure

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to in-store displays of alcohol may also predict an increased probability of drinking.⁴⁷ Existing and new outlets will pose a risk in relation to exposure to alcohol advertising.

85. 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.
86. 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.
87. 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.⁴⁸ Rather, minimising harm, and reflecting community views should be what determines the shape of a LAP.

Proximity of new licences to existing licences

88. 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).^{49,50}

Issue of new licences

89. 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.⁵¹⁻⁵⁵
90. 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.¹⁰ It is however clear that deprived communities experience more harm per litre of alcohol consumed, when compared to advantaged communities with the same level of drinking.⁵⁶
91. The neighbouring Horowhenua District Council Local Alcohol Policy³³ 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

92. Alcohol Healthwatch **recommends** the inclusion of discretionary conditions relating to off-licences in the LAP.
93. 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.⁵⁷
94. From November 12, 2019, Ireland no longer permits alcohol advertising within 200m of schools, crèches, or council playgrounds.⁵⁸ 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.

95. 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.
96. Research has documented the association between single sales and alcohol-related violence and crime.⁵⁹ Furthermore, an intervention to reduce single sales was found to reduce rates of alcohol-related ambulance attendances among 15 to 24 year olds.⁶⁰
97. 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 Committee⁶¹ 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*
 - ii. *Shots or pre mixed shots.*
98. We see no reason why this provision cannot be included as a discretionary condition within the proposed Local Alcohol Policy.
99. Further to the discretionary conditions outlined in the Draft LAP, a recent decision by the Auckland DLC regarding a new off-licence outlined conditions (see paragraph 136)⁶² around RTDs, pricing, and advertising that may be of interest in the development of discretionary conditions for the Palmerston North LAP:
 - (h) *No sales of:*
RTDs 7% abv or above
No RTDs over 500ml
Shots
Light spirits (being spirits under 14% ABV)
Single sales from packs
Cask wine
 - (i) *RTD pricing as follows:*
No RTD 4 pack below \$12.99
No RTD 6 pack below \$16.99
No RTD 10 or 12 pack below \$26.99
No RTD 18 pack below \$36.99
 - (j) *External advertising on the front window is limited to a maximum of 25% and the name/brand of the store.*
 - (k) *There will be no advertising of alcohol products or brands outside the premises (apart from the trading name of the premises), such as (but not limited to) sandwich boards, billboards, flags, or similar forms of advertising.*
 - (l) *There will be no floor displays inside the premises.*

30-16

Club licences

100. 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.⁶³
101. 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.^{64,65} In New Zealand, the effects of club density on violence are shown to be stronger in areas with low populations (e.g. rural areas).⁶⁵ 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.⁶⁶
102. Alcohol Healthwatch **supports** the proposed cease of trading of 12am for club licences, Monday to Sunday.
103. However, Alcohol Healthwatch **recommends** that the earliest trading hour for club licences be 10am, Monday to Sunday.
104. 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.
105. 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.
106. Alcohol Healthwatch **recommends** a discretionary condition for club licences that requires a qualified, certificated manager on duty when alcohol is being sold and supplied during higher-risk periods.

Special licences

107. 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.
108. Alcohol Healthwatch **recommends** the inclusion and use of discretionary conditions for special licences.
109. 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.
110. 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.
111. 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

30-17

112. Alcohol Healthwatch **supports** the Council's signalled intention to review the LAP two years after its adoption.
113. 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.
114. Alcohol Healthwatch suggests 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).
115. 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.
116. As stated earlier, the pandemic will greatly affect alcohol use in the coming years. Measuring trends in alcohol use and harm will be challenging as the impacts of the pandemic will be felt for many years.

Conclusion

117. Alcohol Healthwatch **supports** the Council in progressing their Local Alcohol Policy, but believe that greater restrictions will enable the minimisation of alcohol harm. Evidence-based measures are available to reduce harm to the local residents, and we believe the Council has a duty to use them. Reducing trading hours will present significant opportunities to minimise harm. We also encourage Council to consider additional controls on location of licensed premises, particularly off-licences.

30-18

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14708326

31

Merle Lavin

From: Masonic Hotel PN <info@masonichotel.co.nz>
Sent: Friday, 9 October 2020 1:28 pm
To: Submission
Subject: Draft Local Alcohol Policy 2020 submission

Hi Council and Peter

I support the new changes set out in the Proposal August 2020. I do not wish to speak at any hearings. Well thought out proposal with concessions for all.

Colleen Maxwell
Masonic Hotel
249 Main Street
Palmerston North

32

Merle Lavin

Subject: FW: submission alcohol policy

From: ray alcock >

Sent: Wednesday, 7 October 2020 12:24 PM

To: Palmerston North City Council Info <Info.Info@pncc.govt.nz>

Subject: submission alcohol policy

the opening time for bottleshops and supermarkets needs to be reviewed, but you could get up, buy a box of beer, go back to bed and get up at a normal time, after having consumed a few.

ray alcock

Merle Lavin

33-1

14673416

From: Submission
Subject: FW: Draft Local Alcohol Policy 2020 submission

Your contact details

Full name
 Crystelle Jones

Name of the organisation you represent

Privacy

Withhold my contact details
 True

Hearings

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

Issuing further licences

The Council is not proposing to include restrictions on whether to issue further licences.
 I oppose this

Please provide any comments below:
 Restrictions are necessary to control the number of liquor outlets.

Trading hours

The Council is proposing to set the maximum trading hours for some on-licensed premises (taverns, bars, hotels and restaurants with a bar area operated as a tavern) to 8am to 3am the next day; for all other on-licensed premises to 8am to 1am the next day; for off-licensed premises (such as bottle stores and supermarkets) to 7am to 9am; 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:
 With the caveat that I believe supermarkets and grocery stores are not suitable for the sale of recreational drugs such as alcohol and nicotine.

Location

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

33-2

Please provide any comments below

Clearly proximity to schools and wellness centres is undesirable.

One-way door restrictions

The Council is proposing to include a mandatory one-way door restriction for all on-licensed premises trading past 2am. The one-way door restriction would apply from 2am.

I support this

Please provide any comments below:

Discretionary conditions

The Council has not included any discretionary conditions in the draft policy.

I oppose this

Please provide any comments below:

Not having discretionary conditions gives liquor outlets a lot of scope.

Other comments

Do you have any other comments or suggestions to make?

This is possibly policy for central government, but I believe alcohol has no place in supermarkets, dairies or grocery stores. Having alcohol in supermarkets normalises its consumption. Alcohol is a known carcinogen and cause of violence. Money spent on alcohol by people on low incomes is money that could be spent on nutrition, and may replace nutritious options for vulnerable people. Please get alcohol out of our food outlets.



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 and Appointed 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 forwarded to you once available. 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 te reo Māori 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.
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 first ordinary meeting of the Community Development Committee in 2021 (date to be determined and advised). 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 Susana Figlioli, Democracy & Governance Administrator, phone 06 356-8199 extension 7152 or email susana.figlioli@pncc.govt.nz .

* * * * *

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 04 November 2020, commencing at 9.02am.

Members Present: Councillors Lorna Johnson (in the Chair), Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor and Aleisha Rutherford.

Non Members: Councillor Vaughan Dennison.

Apologies: The Mayor (Grant Smith) (late arrival and early departure on Council Business), Councillor Bruno Petrenas (late arrival) and Ms Danielle Harris.

The Mayor (Grant Smith) entered the meeting at 9.07am during consideration of clause 39. He was not present for clause 38. He was not present when the meeting resumed at 12.18pm. He was not present for clauses 43 to 48 inclusive.

Councillor Bruno Petrenas entered the meeting at 10.06am during consideration of clause 41. He was not present for clauses 38 to 40 inclusive.

Councillor Renee Dingwall declared an interest in clause 43.

Councillors Vaughan Dennison and Lew Findlay QSM declared an interest in clause 40.

38-20 Apologies

Moved Lorna Johnson, seconded Vaughan Dennison.

The COMMITTEE RESOLVED

1. That the Committee receive the apologies.

Clause 38-20 above was carried 13 votes to 0, the voting being as follows:

For:

Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Aleisha Rutherford and Vaughan Dennison.

39-20 Public Comment

Mr Fernandez Mackey and Mr Matthew Mataki made public comment on situations affecting the Highbury neighbourhood, relating to clause 45-20

below. Mr Mackey advised about gatherings and alcohol consumption occurring outside the shopping centre in a public area where school children passed through. Mr Mackey also expressed concerns about traffic issues in Highbury Avenue and the surrounding area, particularly speeding, and some intersections that they considered were not sufficiently signposted and safe enough for children and other pedestrians.

The Mayor (Grant Smith) entered the meeting at 9.07am.

Moved Lorna Johnson, seconded Vaughan Dennison.

The **COMMITTEE RESOLVED**

1. That the public comment be received for information.

Clause 39-20 above was carried 14 votes to 0, the voting being as follows:

For:

The Mayor (Grant Smith) and Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Aleisha Rutherford and Vaughan Dennison.

40-20

Presentation - MidCentral District Health Board

Dr Syed Zaman, Clinical Executive Te Uru Whakamauora - Healthy Ageing & Rehabilitation at MidCentral District Health Board, made a presentation regarding the importance of social connectedness in an ageing society, pointing out the risks associated with loneliness and suggesting tips to build connectedness in the community to increase wellbeing of the elderly.

Moved Lorna Johnson, seconded Patrick Handcock ONZM.

The **COMMITTEE RESOLVED**

1. That the Community Development Committee receive the presentation for information.

Clause 40-20 above was carried 14 votes to 0, the voting being as follows:

For:

The Mayor (Grant Smith) and Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Aleisha Rutherford and Vaughan Dennison.

Note:

Councillors Vaughan Dennison and Lew Findlay QSM declared an interest in this clause.

41-20

Presentation - Disability Reference Group

Ms Rose Boddy, Chairperson of the Disability Reference Group, made a presentation summarising the work done throughout the year, noting good outcomes despite the impact of Covid-19. Ms Boddy thanked the Council Welfare Support Team for the services provided to the disability community during lockdown.

Ms Boddy expressed that the mobility parking scheme with mobility parks available 24/7 had been a big achievement, however the rate of compliance by other drivers was still low. Another achievement was the provision of sign language interpreters at major events and Council meetings when requested. She advocated for volunteering and work opportunities for people with disabilities.

Ms Boddy encouraged the Council to consider the Enabling Good Lives approach, which is an approach around rethinking communities and civil participation for disabled people and their families, moving away from the medical model to a citizenship model of disability.

During discussion, an additional motion regarding Enabling Good Lives principles was proposed. It was also agreed to refer a proposed assessment of Council facilities from an accessibility perspective to the Long Term Plan.

Moved Aleisha Rutherford, seconded Lorna Johnson.

The **COMMITTEE RECOMMENDS**

1. That the Community Development Committee receive the presentation for information.

Clause 41.1 above was carried 14 votes to 0, the voting being as follows:

For:

The Mayor (Grant Smith) and Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Aleisha Rutherford and Vaughan Dennison.

Councillor Bruno Petrenas entered the meeting at 10.06am.

Moved Karen Naylor, seconded Lorna Johnson.

2. That Council acknowledges the Enabling Good Lives principles and seeks to integrate them into the way Council goes about its work.
3. That the following recommendation be referred to the LTP: That the Chief Executive undertakes an assessment of Council facilities and infrastructure to determine whether the needs of people with disability are appropriately addressed, and to identify any gaps.

Clauses 41.2 and 41.3 above were carried 15 votes to 0, the voting being as follows:

For:

The Mayor (Grant Smith) and Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

Note:

Moved Leonie Hapeta, seconded Aleisha Rutherford.

On a motion to amend the original motion that said 'that the Chief Executive undertakes an assessment of Council facilities and infrastructure to determine whether the needs of people with disability are appropriately addressed, and to identify any gaps', to include the words 'that the following recommendation be referred to the LTP', the motion was carried 12 votes to 3, the voting being as follows:

For:

The Mayor (Grant Smith) and Councillors Lorna Johnson, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Bruno Petrenas and Aleisha Rutherford.

Against:

Councillors Rachel Bowen, Karen Naylor and Vaughan Dennison.

42-20

Confirmation of Minutes

Moved Lorna Johnson, seconded Rachel Bowen.

The **COMMITTEE RESOLVED**

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

Clause 42-20 above was carried 15 votes to 0, the voting being as follows:

For:

The Mayor (Grant Smith) and Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

43-20

Welcoming Communities - Annual Report

Memorandum, presented by Joann Ransom, Community Development Manager and Stephanie Velvin, Welcoming Communities Coordinator.

The meeting adjourned at 10.46am.

The meeting resumed at 12.18pm.

When the meeting resumed The Mayor (Grant Smith) was not present.

Moved Lorna Johnson, seconded Rachel Bowen.

The **COMMITTEE RESOLVED**

1. That the report entitled 'Welcoming Communities - Annual Report' presented to the Community Development Committee on 4 November 2020, be received for information.

Clause 43-20 above was carried 14 votes to 0, the voting being as follows:

For:

Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

Note:

Councillor Renee Dingwall declared an interest in this clause.

44-20

The future of library services in Highbury

Report, presented by Linda Moore, Libraries Manager and Julie Macdonald, Strategy and Policy Manager.

Moved Lorna Johnson, seconded Aleisha Rutherford.

The **COMMITTEE RECOMMENDS**

1. To receive the report titled 'The future of library services in Highbury' presented to the Community Development Committee on 4 November 2020.
2. To endorse 'Option 1 Te Pātikitiki status quo - delay further action pending citywide review' for the future of library services in Highbury.

Clause 44-20 above was carried 14 votes to 0, the voting being as follows:

For:

Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

45-20

Whānau Ora Health and Wellbeing Portfolio Update (October)

Memorandum, presented by Councillor Billy Meehan.

Moved Lorna Johnson, seconded Billy Meehan.

The **COMMITTEE RESOLVED**

1. That the Whānau Ora Health and Wellbeing Portfolio Update Report for October 2020 presented to the Community Development Committee Meeting on 4 November 2020, be received for information.

Clause 45-20 above was carried 14 votes to 0, the voting being as follows:

For:

Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

46-20

People and Community Portfolio Update (June-October)

Memorandum, presented by Councillor Lorna Johnson.

Moved Lorna Johnson, seconded Rachel Bowen.

The **COMMITTEE RESOLVED**

1. That the People and Community Portfolio Update Report for June - October 2020 presented to the Community Development Committee Meeting on 4 November 2020, be received for information.

Clause 46-20 above was carried 14 votes to 0, the voting being as follows:

For:

Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

47-20

Safe City Portfolio Update (October)

Memorandum, presented by Councillor Patrick Handcock ONZM.

Moved Lorna Johnson, seconded Patrick Handcock ONZM.

The **COMMITTEE RESOLVED**

1. That the Safe City Portfolio Update Report for October 2020 presented to the Community Development Committee Meeting on 4 November 2020, be received for information.

Clause 47-20 above was carried 14 votes to 0, the voting being as follows:

For:

Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

48-20

Committee Work Schedule - November 2020

In discussion it was agreed to remove the report regarding mobility parking from the Committee Work Schedule since the Council had already implemented additional services to monitor compliance of this scheme.

Moved Lorna Johnson, seconded Rachel Bowen.

The **COMMITTEE RECOMMENDS**

1. That the Community Development Committee receive its Work Schedule dated November 2020.

Clause 48.1 above was carried 14 votes to 0, the voting being as follows:

For:

Councillors Lorna Johnson, Rachel Bowen, Brent Barrett, Susan Baty, Zulfiqar Butt, Renee Dingwall, Lew Findlay QSM, Patrick Handcock ONZM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

Moved Karen Naylor, seconded Lorna Johnson. 2. That the Report outlining the cost of achieving mobility parking compliance be removed from the Community Development Committee Work Schedule.

Clause 48.2 above was carried 11 votes to 3, the voting being as follows:

For:

Councillors Lorna Johnson, Rachel Bowen, Susan Baty, Zulfiqar Butt, Lew Findlay QSM, Leonie Hapeta, Billy Meehan, Karen Naylor, Bruno Petrenas, Aleisha Rutherford and Vaughan Dennison.

Against:

Councillors Brent Barrett, Renee Dingwall and Patrick Handcock ONZM.

The meeting finished at 12.57pm

Confirmed 10 December 2020

Chairperson

MEMORANDUM

TO: Community Development Committee

MEETING DATE: 10 December 2020

TITLE: Draft Local Alcohol Policy - Summary of Submissions

PRESENTED BY: Julie Macdonald - Strategy and Policy Manager

APPROVED BY: David Murphy, Acting General Manager - Strategy and Planning

RECOMMENDATION(S) TO COMMUNITY DEVELOPMENT COMMITTEE

1. That the report titled 'Draft Local Alcohol Policy - Summary of Submissions' presented to the Community Development Committee on 10 December 2020 be received for information.

1. ISSUE

The Council carried out public consultation on the draft Local Alcohol Policy (LAP) 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 summary of the consultation process and the number of submissions received. A more detailed summary and analysis of submissions will be prepared for the next meeting of the Community Development Committee, which is expected to be held in March 2021.

2. BACKGROUND

On 26 August 2020 the Council approved the draft LAP for public consultation. The draft LAP is the third iteration of the policy that Council has consulted on and was developed following consultation that took place in 2019, incorporating changes to address concerns raised by submitters. Further consultation was required because the scope of changes being considered went beyond that which was initially proposed.

The current consultation period took place between 5 September and 9 October 2020. The Council received 33 written submissions during the consultation period. Eleven submitters have indicated that they want to speak to Council about their submissions.

The consultation process followed was very similar to the process used for the previous iteration of the draft LAP. The Statement of Proposal, which included the revised draft LAP, was published and made available as a printed document at all of Council's ordinary

ITEM 7

information points. A public notice was placed in the Manawātū Standard and the Guardian newspapers. A media release was circulated, and posts were placed on Council’s social media platforms. Copies of the consultation document were provided directly to those who had an identified interest in the draft LAP. The list of stakeholders built upon the list used previously, with more than 475 emails and approximately 25 letters sent out with information about the draft LAP and inviting submissions.

In addition to promoting the consultation process and circulating information about the proposals, two drop-in sessions were organised and promoted to give anyone an opportunity to come along and learn more about the draft LAP, to ask questions, and to make a submission. These drop-in sessions were delayed by the Covid-19 level 2 restrictions, but went ahead at the Ashhurst Community Library on 23 September and at the Central Library on 24 September.

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 33 submissions received, 22 made use of this online/printed form, and answered the provided questions. The remaining 11 submitters provided a free-form submission and did not follow the supplied format.

The following table shows a brief numerical summary of 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	Impose one-way door policy	Don’t impose discretionary conditions
Support	10 (30%)	10 (30%)	9 (27%)	11 (33%)	7 (21%)
Oppose	6 (18%)	12 (36%)	7 (21%)	6 (18%)	5 (15%)
Don’t know/no opinion	6 (18%)	0	6 (18%)	5 (15%)	7 (21%)
No answer (free-form submission)	11 (33%)				

3. NEXT STEPS

A full summary and analysis of the issues raised by submitters will be provided to the Committee at its next meeting, which is expected to be held in March 2021. 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	Yes
Are the decisions significant?	No
If they are significant do they affect land or a body of water?	No
Can this decision only be made through a 10 Year Plan?	No
Does this decision require consultation through the Special Consultative procedure?	No
Is there funding in the current Annual Plan for these actions?	Yes
Are the recommendations inconsistent with any of Council's policies or plans?	No
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