

**Proposed Local
Alcohol Policy
2025**

**Hearing
Submissions
Catalogue**

**ROTORUA
LAKES COUNCIL**

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Submitter –Ngati Uenukukopako Iwi Trust

Subject: Support for Permanent Freeze on Off-Licence Applications and Implementation of a Sinking Lid Policy

Introduction

This submission advocates for a permanent freeze on off-licence applications in designated areas of deprivation 9 and 10. Given the socio-economic challenges faced by these communities, a sinking lid policy would serve as a valuable enhancement to the proposed permanent freeze. Alcohol-related harm presents a significant risk to vulnerable populations, and it is imperative that we prioritize public health while tailoring our response to the unique conditions of these areas.

Rationale for Policy Implementation

Implementing a freeze and sinking lid policy in deprivation 9 and 10 areas represents a strategic approach that addresses the economic, social, and health challenges inherent to these communities. Research consistently indicates a direct correlation between alcohol availability and consumption levels, which exacerbates existing social and health issues. This policy aligns closely with public health objectives aimed at minimizing alcohol-related harm—areas with high alcohol outlet density typically face increased rates of alcohol misuse, domestic violence, and health disparities.

By limiting both off-licence and on-licence availability, we can substantially mitigate these risks and foster healthier community environments. While acknowledging the economic concerns of local business owners and aspiring entrepreneurs, it is essential to recognize that the long-term health benefits for the community will supersede the short-term limitations on business opportunities. This policy encourages the development of alternative, alcohol-free business models, thereby promoting a thriving local economy that prioritizes health.

Evidence and Impact

While there may be questions regarding the effectiveness of a freeze on alcohol-related harm, empirical evidence from similar policies demonstrates that reducing alcohol outlet density can lead to significant decreases in consumption and associated negative consequences. To enhance the effectiveness of this initiative, ongoing evaluation and feedback from the community will be crucial to ensure that the policy remains relevant and impactful.

Comprehensive Strategy for Success

For the proposed policy to be truly effective, it should be implemented as a part of a holistic strategy that encompasses the following elements:

Education Programs: Launch initiatives to promote responsible drinking habits and raise awareness about the dangers of excessive alcohol consumption.

Support Services: Increase access to services for addiction treatment, mental health support, and rehabilitation to assist individuals adversely affected by alcohol use.

Community Engagement: Actively involve Hapu and community members in addressing the root causes of alcohol-related harm, fostering a sense of ownership and collective responsibility for well-being.

Monitoring and Evaluation: Establish a robust framework for the continuous assessment of the policy's impact. Regular evaluations will facilitate timely adjustments based on empirical data and evolving community needs, ensuring the policy remains effective and responsive.

Conclusion

In summary, a permanent freeze on off-licence and on-licence applications in areas classified as deprivation 9 and 10 is a proactive measure to combat alcohol-related harm while prioritizing public health. The addition of a sinking lid policy would further strengthen this proposal. This approach reflects a deep understanding of the socio-economic conditions our communities face and seeks to address the health disparities that afflict vulnerable populations like Maori. Ngati Uenukukopako Iwi Trust supports adopting this comprehensive strategy and incorporating Hapu/Community engagement early up, we can significantly enhance the well-being of all residents in Rotorua.

Thank you for considering this submission.

Nga mihi,

Nireaha Pirika

Chairperson

Ngati Uenukukopako Iwi Trust

Submitter – Ryan Gray



Respondent No: 118

Login: Anonymous

Email: n/a

Responded At: Mar 28, 2025 21:38:52 pm

Last Seen: Mar 28, 2025 21:38:52 pm

IP Address: n/a

Q1. I would like to:

Answer the questions online

Q2. E whakaae ana rānei koe ki te whiringa e hiahiaitia ana e te Kaunihera (Whiringa 2): Kia 3 tau te roa o te aukatinga taupuatanga o te tukunga o ngā raihana toa hoko waipiro me te pōhēhē hoki ka whakaaetia ētehi atu raihana toa hoko waipiro ā muri ake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): a temporary freeze on issuing any new off-licences* for 3 years and a presumption against issuing any new off-licences thereafter**? If you disagree, please indicate your preferred option.*Off-licence: allows sale and supply of alcohol for consumption elsewhere, e.g. bottle store, supermarket **No new off-licences issued for 3 years and after 3 years it will be difficult to be issued a new off-licence View the question on page 9 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q3. Do you have any additional comments?

This policy also needs to have a sinking lid attached i.e if a liquor store closes, another one does not open its place.

Q4. Do you have any additional comments?

not answered

Q5. E whakaae ana rānei koe ki te whiringa e hiahiaitia ana e te Kaunihera (Whiringa 2): Kia wawe ake te katinga o ngā toa hoko waipiro i te 7 karaka i te ata ki te 9 karaka i te pō? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): Earlier closing times for off-licences making trading hours 7am to 9pm? If you disagree, please indicate your preferred option. View the question on page 10 on the Statement of Proposal - (PDF, 1.2MB)

Disagree

Q6. Do you have any additional comments?

not answered

Q7. Do you have any additional comments?

closing times for off-licences should be 8am to 8pm. If someone hasn't sorted their box of codys by 8pm then chances are they really don't need it.

Q8. E whakaae ana rānei koe ki te tono a te Disagree

Kaunihera kia rite ngā hāora rato ki ngā hāora tuwhera o ngā toa hoko walpiro? Ki te whakahē koe, tēnā whakamāramahia mai. Do you agree or disagree with the Council's proposal to align delivery hours with off-licence opening hours? If you disagree please provide your reasoning. View the question on page 11 on the Statement of Proposal - (PDF, 1.2MB)

Q9. Do you have any additional comments?

not answered

Q10. Do you have any additional comments?

If the time changes, this will put undue strain on roads with deliveries trucks driving at peak times, perhaps having to return to restaurants and bars and making their lives harder. Delivery to off-license shouldn't change.

Q11. E whakaae ana rānei koe ki te whiringa e Agree

hiahia ana e te Kaunihera (Whiringa 2): kia mau tonu ngā whakatairanga herenga here kore me ētehi atu herenga here kore ka āpitihia? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): The current discretionary conditions be retained and further additional discretionary conditions be added? If you disagree, please indicate your preferred option. View the question on page 12 on the Statement of Proposal - (PDF, 1.2MB)

Q12. Do you have any additional comments?

So long that it is clearly discretionary, a boutique off-license selling high value craft beers should still be able to sell by the can. perhaps an alcohol content to value ratio set at an appropriate level to mitigate harm would be better

Q13. Do you have any additional comments?

not answered

Q14. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): kia whakaitia ngā hāora o te raihana rato waipiro i ngā pāpara kāuta me ngā wharekai o te tāone ki te rua karaka i te ata. Kia katia tonuhia ngā pāpara kāuta me ngā wharekai i waho i te tāone i te tahi karaka i te ata? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): on-licence* closing hours within the Inner City be reduced to a maximum of 2am. On-licence* closing hours for premises outside the Inner City will remain 1am? If you disagree, please indicate your preferred option.* On-licence: allows sale and supply of alcohol for consumption on site, e.g. pub, restaurant View the question on page 14 on the Statement of Proposal - (PDF, 1.2MB)

Disagree

Q15. Do you have any additional comments?

not answered

Q16. Do you have any additional comments?

Rotorua nightlife is already lacking. further restricting opening hours will reduce opportunity for economic growth and more importantly the social and cultural opportunities that come from going out and having fun with friends. Limiting off-licenses and encouraging on-licences will do more to improve Rotorua through attracting events and new venues than further limiting the times in which they can trade. The start time needs to align with the off-license time, or be 11am. No one really needs a beer at 8am. However there should be discretionary permission for events

Q17. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, karekau he herenga kia tū tētehi hui tonu wawe e whiwhi ai i tētehi raihana pāpara kāuta e whai pānga ana ki ngā ratonga me whai tūtehi? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, there are no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities? If you disagree, please indicate your preferred option. View the question on page 15 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q18. Do you have any additional comments?

not answered

Q19. Do you have any additional comments?

not answered

Q20. E whakaae ana rānei koe ki te whiringa e hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana pāpara kāuta? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for on-licences? If you disagree, please indicate your preferred option. View the question on page 16 on the Statement of Proposal - (PDF, 1.2MB)

Disagree

Q21. Do you have any additional comments?

not answered

Q22. Do you have any additional comments?

Council needs to have the option to apply additional discretionary conditions where appropriate.

Q23. E whakaae ana rānei koe ki te whiringa e hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana-karapu? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for club-licences? If you disagree, please indicate your preferred option. View the question on page 18 on the Statement of Proposal - (PDF, 1.2MB)

Disagree

Q24. Do you have any additional comments?

not answered

Q25. Do you have any additional comments?

Council needs to have the option to apply additional discretionary conditions where appropriate - particularly when a license holder is shown to be contributing to harm

Q26. E whakaae ana rānei koe ki te whiringa e hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana motuhake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koDo you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for special-licences? If you disagree, please indicate your preferred option.View the question on page 20 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q27. Do you have any additional comments?

not answered

Q28. Do you have any additional comments?

not answered

Q29. He kupu kōrero atu anō āu?Do you have any other feedback?

The LAP needs to strike a fair balance between doing what it can to prevent harm, but also allow for fun! Rotorua used to have a reputation as a great place to hold events with nightlife. This is no longer the case. People will regularly travel out of town to experience nightlife. As a tourist town we need to compete with Queenstown, we aren't even close right now. Tourists simply sit in their accommodation and move on, instead of going out, meeting locals and adding to their Rotorua experience. We should be encouraging of new hospitality, Manaakitanga is in our DNA - don't restrict it

Q30. Tukuatu he puka wea ki koneiUpload a submission here

not answered

Q31. Tuhia mai he tāpaetanga e pā ana ki tētahi o ngā kaupapa, otirā ki ngā kaupapa katoaWrite a submission about any/all of the topics.

not answered

Q32. Tō IngoaName

Ryan Gray

Q33. Tō ImēraEmail address

[REDACTED]

Q34. Kei te pīrangī koe ki te tū i mua i te marea ki te kōrero ki te Kaunihera?Do you wish to present your submission publicly in front of elected members at a hearing? What to expect at a hearing - (PDF, 40KB)

Yes

Q35. Tō WāeaContact number

[REDACTED]

Q36. When would you prefer to present at a hearing?

Morning

Evening

Submitted – Super Liquor Holdings Limited

Submission

by



to the

Rotorua Lakes Council

on the

Consultation for the Draft Local Alcohol Policy

March 2025

To whom it may concern

Thank you for the opportunity to make a submission for the Rotorua Draft LAP.

Super Liquor Background

Super Liquor Holdings (SLH) is a New Zealand franchisor with over 180 stores across New Zealand. Super Liquor has 3 stores governed by the Rotorua LAP. These stores are Colonial, Mitchell Downs & Rotorua Central. Each store has entered into a franchise agreement with SLH. Each franchisee receives the benefits of, and honours the obligations of participating in, the Super Liquor branded system. The Super Liquor franchisee offer is based on creating a long-term sustainable retail business.

Super Liquor franchisees represent a broad spectrum of small and medium sized businesses that are positioned in both urban and rural locations. Franchisees pride themselves on being part of the communities they serve. Super Liquor has a co-operative group culture.

Super Liquor Holdings:

- a) provides franchisees with extensive support in the way of retail expertise and advice,
- b) requires compulsory and ongoing training in the Sale & Supply of Alcohol Act 2012 for all serving staff through the Super Liquor Academy (a comprehensive online training system),
- c) conducts in-person audits of all Super Liquor stores quarterly,
- d) requires high retail standards, including no alcohol or product branding on the exterior of stores.
- e) provides comprehensive retail management systems, IT support and security training.

At Super Liquor, we do not aim to lead on price, instead we pride ourselves on providing the best quality in-store experience, customer service and product range.

All Super Liquor store owners have invested significant capital in their businesses. They appreciate that obtaining an alcohol licence and then having it renewed every three years is a privilege upon which their significant capital investment is dependent. Business owners need certainty on the content of the LAP, how it will be administered, and how they may be negatively impacted.

Because of their significant investment, they also want to have the confidence that licensing application or renewal assessments by District Licensing Committees (DLCs) and the Alcohol Regulatory Licensing Authority (ARLA) are based on balanced and reasonable criteria aimed at achieving the object of the Act. Assessments also need to be based on matters that the licensee can control or influence.

Super Liquor takes its responsibilities towards the minimisation of alcohol harm very seriously. We agree with the objective of the policy statement of balancing the needs of the residents of the Rotorua Lakes Council regarding the safe and responsible sale, supply and consumption of alcohol, while addressing the statutory requirements and object of the Sale and Supply of Alcohol Act 2012.

As a retailer of alcohol beverage products, we understand Rotorua Lakes Council's LAP consultation process and would like to make the following comments on the draft LAP document.

Off-Licences

- **Location of premises by reference to proximity to sensitive facilities**

SLH agrees with this condition. Specifically, the renewal of an off-licence or the issue of a new off-licence for an existing off licensed premises will not be affected by any sensitive facility established after the original off-licence has been issued.

- **Prohibitions and restrictions on issuing further licences**

SLH believes that each application should be judged on its merits and not governed by an overriding provision.

SLH believes that the proposed approach is unreasonable, in that there may be valid reasons why a new off-licence could be permitted (for example future residential developments, population growth, change in zoning etc).

We believe that the District Licensing Committee should have the responsibility for determining any further applications for a new off licence based on the information provided by an applicant and recognising that every application is unique to the particular site in question.

- **Maximum trading hours**

We are open to the proposal to reduce the hours of off-licences providing the same hours are applied to **all off licences**. We are not aware of any evidence that a difference between bottle store and supermarket hours will impact in a significant way to reduce alcohol related harm.

Alcohol related harm stems from alcohol, not specific types of alcohol. There is no evidence that Super Liquor can find that demonstrates the sale, supply and consumption of alcohol will be undertaken any more safely and responsibly by differentiating between supermarkets, grocery stores, and bottle stores. Nor is there any evidence that demonstrates the harm caused by inappropriate consumption is minimised by licence type differentiation.

We believe that if a change of hours are adopted, then it shall be imposed on all off licences at the same time. We believe it would be unfair for a licence that has just had its licence renewed, to be able to trade for a period of three years with greater hours than one that was renewed after this LAP is adopted.

We are seeking a level playing field amongst all off premise outlets (bottle stores and supermarkets) and **strongly oppose** any proposal that differentiates on the basis of hours or any other discretionary conditions.

Such inequitable conditions do nothing to reduce alcohol harm, they simply shift customer behaviour and create commercial advantage and disadvantage (an uneven commercial playing field) between alcohol retailers.

- **Discretionary Conditions of Off Licences**

As a business, discretionary conditions concern us the most, particularly the **optional** conditions. SLH strongly opposes discretionary conditions. We believe that if a condition is important to the

community, then it should be included in the LAP for all off licenses and not applied in a discretionary manner to avoid the risk of creating an unlevel playing field.

We request that if there are changes made to the draft LAP, that whatever is settled, including discretionary conditions should apply to all off-licences (including bottle stores, supermarkets, grocery stores, off-licence held in the same premises as a club licence and on-line).

The following comments relate to the two sections named 'mandatory conditions' and 'optional conditions':

Mandatory conditions:

1. **Social Responsibility Policy** – SLH is supportive of ensuring all off licences have a social responsibility policy. However, unlike on licence host responsibility plans (which are normally one page), the off licence social responsibility policy are multiple pages, making it hard to display. We ask that this is amended to remove the word display.
2. **Signs detailing statutory restrictions at every point of sale.** We believe that this condition should be amended to say that the signs should **be seen or visible** from every point of sale, rather than displayed at each point of sale.
3. **Incident books** – SLH agrees with this condition.
4. **Application of CPTED principles** – SLH agrees with this condition.
5. **Restrictions of the display of product** or price specials on the exterior of the premises / and **Restrictions of on the use of** flags, sandwich boards or any mobile signage.
SLH believes that these two conditions may cause confusion and be enforced in a subjective way, lacking evidence. We ask that the word **restriction** is fully explained or re-worded to ensure that it is used in the way it was intended, so it can be applied consistently across all off licences, not applied on a case-by-case basis.
We also ask that the definition is clearly defined in terms of what is not allowed. For example, brand, price, product shots etc.
6. **Restrictions relating to method of payment such as Buy now, pay later (BNPL).** Super Liquor Holdings agrees that the **formal 'Buy Now, Pay Later schemes** (such as LayBuy or AfterPay) should not be used as a method of payment to buy alcohol. However, the definition of 'buy now, pay later' needs to be clearly explained to avoid confusion such as the use of credit cards or customers purchasing on an account basis. Currently, customers, sole traders and companies can be sold products on an account from time to time. These customers may be local business or individuals that may purchase product on a return basis (e.g. Weddings, Function Centres, Funerals, Corporate functions, Real Estate Agents etc) who may be also be affected by this policy. We request that this definition is clearly defined to include **formal 'Buy Now, Pay Later' schemes only.**

Optional conditions:

1. **Installation and operation of CCTV cameras on the exterior of, and within, premises.** SLH is supportive of this condition, however, clear direction needs to be provided as to the amount of coverage – for example the entrance or carpark areas not the entire external building which would be prohibitive in terms of cost.
2. **Provision of effective exterior lighting** - SLH is supportive of this condition;
3. **Restrictions on single sales and Restrictions on single sales of shots or premixed shots.** SLH strongly opposes this condition. If they are legal products, approved by MPI, then we should have the right to sell them. SLH is also concerned about the word 'restrictions' without any detail on the type of restrictions that could be applied. Our primary concern is that the condition may be imposed on some licences and not others. We request that a condition like this must have adequate detail and applied consistently to all off licenses including bottle stores, supermarkets, grocery stores, off-licence held in the same premises as a club licence

and on-line.

4. **Restrictions on the display of RTDs at the principal entrance to the store or within 3 meters of the front window.** SLH strongly opposes this condition for two key reasons.
 - a. Due to the different sizes and shapes of the retail areas, this will be very hard to enforce.
 - b. All our stores are either restricted or supervised, so why do we need this condition. Exposure to alcohol in supermarkets and grocery stores is higher for young people as they are allowed, as of right, to enter supermarkets on their own without a parent or legal guardian. However, minors are not allowed into a bottle store as of right.

5. **Limiting the visibility from the outside of the premises of internal alcohol-related displays and advertising.** SLH strongly opposes this condition.

We also note that the Draft LAP does not have a similar condition for on premise licences. For example, people can walk past pubs, cafés and restaurants displaying outdoor signage with alcohol branding, alcohol-branded sun umbrellas and signs promoting happy hours and consumers drinking alcohol in garden bars etc. We believe evidence should be provided to support this condition and differentiating between licenses.

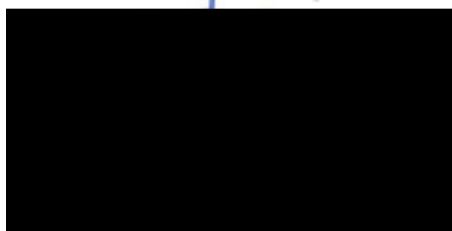
6. **Restrictions on the marketing and promotion of non-alcoholic products that pose a high risk of alcohol-related harm, such as drinking games.** Super Liquor opposes this condition. The condition requires a clear definition of the types of products affected and where to draw the line. For example, the sale of cups and playing cards may be seen by some as drinking games, where others see these as a drinking vessel (cup) and social entertainment (playing cards).

7. **Restrictions on any irresponsible promotions.** SLH believes that this is covered under the Sale and Supply of Alcohol act 2012.

Super Liquor supports a licencing system that recognises and drives responsible liquor retail. I am happy to answer any questions regarding this submission and would like to be updated on the Rotorua Lakes Council's LAP progress.

Thank you for allowing Super Liquor to present a submission.

Yours sincerely



Greg Hoar
National Operations Manager
Super Liquor Holdings Limited

Submitter – Rotorua Youth Council

From: Rotorua Youth Council

Date: 19 March 2025

Introduction

The Rotorua Youth Council appreciates the opportunity to provide feedback on the Proposed Local Alcohol Policy 2025.

As young people who live, learn and grow in Rotorua, we are passionate about creating a community that is safe, healthy and supportive of taiohi. We acknowledge the Council's efforts to reduce alcohol-related harm in our community and support most of the preferred options outlined in the policy.

We also want to highlight that recent research shows positive trends in alcohol consumption amongst young people. Taiohi in Aotearoa are drinking less than in previous generations and are making more informed choices around alcohol. This is a shift that we are proud of and we believe that community-focused policies like the Local Alcohol Policy can help to keep this momentum going.

As the future of Rotorua, we will be the ones most impacted by the changes that you make for the Local Alcohol Policy.

This submission outlines the key areas we support and some additional recommendations from a youth perspective.

Our Position

1. Support for reducing off-licence trading hours

We support the proposal to reduce off-licence trading hours to 7:00am – 9:00pm. Limiting how late alcohol can be purchased helps reduce risky drinking behaviours, violence and other harm that can impact public spaces where young people are. Shorter trading hours make it harder for alcohol to be accessed late at night, which we believe is a step in the right direction for community safety and wellbeing.

2. Additional trading hour restrictions during school times

We encourage the Council to go further by considering additional restrictions for on-licence and off-licence premises during key times when young people are commuting to and from school:

- **7:00am – 9:00am on school days:** This is when many young people are travelling to school.
- **2:30pm – 4:00pm on school days:** This is another peak time for students, and restricting alcohol sales could help create safer, more positive environments around schools and transport hubs.

We also support extra trading restrictions on public holidays and other times when families and young people are likely to be out in the community.

3. Support for a freeze on new off-licences

Rotorua Youth Council supports the proposed three-year freeze on issuing new off-licences, alongside a presumption against new licences after that period. We know that higher numbers of alcohol outlets are linked to higher rates of alcohol-related harm. A freeze allows the community time to monitor the effectiveness of the policy without the risk of more outlets being added.

4. Location restrictions for new off-licences

We support the requirement for new off-licence applicants to engage with sensitive sites within 200 metres of their proposed premises. We also strongly recommend that the list of sensitive locations be expanded to include:

- **Urupā and cemeteries:** These are places of cultural and spiritual significance and should be protected from the presence of alcohol outlets.
- **Marae:** These are places of cultural and spiritual significance and should be protected from the presence of alcohol outlets.
- **Places of worship:** Many faith communities support alcohol-free spaces that promote wellbeing.

Furthermore, we recommend that the distance be extended from 200 meters from sensitive sites. This would limit the exposure of alcohol to vulnerable members of the public.

We would also recommend setting a minimum distance between off-license premises in order to limit over-saturation and increased concentration.

5. Supporting positive change in youth drinking trends

As mentioned, drinking among young people is decreasing and we want to support and encourage this shift. We recommend that the Council include a clear focus on continuing to support this positive trend alongside the Local Alcohol Policy.

This could include:

- **Alcohol harm education:** We encourage the Council to support youth-friendly alcohol education programmes that focus not only on risks but also on positive decision-making. These programmes should be developed in partnership with schools, iwi, hapū, and community organisations so they are meaningful, culturally relevant, and engaging.
- **Youth wellbeing and support services:** Policy changes should be backed up with accessible services for young people affected by alcohol harm. We believe that integrating alcohol harm messaging into wider youth wellbeing initiatives would strengthen the impact.

Conclusion

The Rotorua Youth Council supports the direction of the Proposed Local Alcohol Policy 2025, particularly:

- Reducing off-licence trading hours
- Freezing new off-licences
- Strengthening location restrictions to protect culturally and spiritually significant spaces as well as limiting off-licence saturation.

We also encourage the Council to consider additional restrictions during school commuting times and public holidays, as well as further investment in education and support for young people.

Rotorua's young people are showing leadership and positive change, with national research indicating that many taiohi are choosing to drink less frequently and delay alcohol use. We want to see policies that continue to support this momentum and ensure that all young people have the opportunity to live, learn, and thrive in safe, healthy environments.

Thank you for the opportunity to share the views of Rotorua's taiohi. We look forward to continuing to be part of this conversation.

Appendix 1: Youth Drinking Trends — Key Research

Recent research shows a clear trend of decreasing alcohol use among young people in Aotearoa over the past decade:

- The Youth2000 Survey Series found that in 2019, 19% of secondary school students reported drinking alcohol in the past month, compared to 34% in 2007.
- Fewer young people reported binge drinking. In 2019, 8% of students reported binge drinking (5+ drinks in one session) in the past month, down from 23% in 2007.
- Young people are also choosing to delay the age they first try alcohol.

These trends suggest that taiohi are making more informed, health-focused choices about alcohol use. However, we acknowledge that alcohol-related harm still affects young people.

The Rotorua Youth Council believes the Local Alcohol Policy can help to support and encourage this positive shift, making it easier for young people to continue to make healthy choices about alcohol.

References

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31 March 2025

Rotorua Lakes Council
1061 Haupapa Street
Rotorua

Review of the 2019 Local Alcohol Policy - Feedback from Foodstuffs North Island Limited & its stores in the Rotorua Lakes Council area

Consultation and feedback

Rotorua Lakes Council (**Council**) is consulting on the review of its 2019 Local Alcohol Policy (**LAP**). In particular, the Council has invited feedback on a new Draft Local Alcohol Policy (**DLAP**).

Foodstuffs North Island Limited (**Foodstuffs**) is grateful for the opportunity to provide feedback on the DLAP.

Who we are

As you will know, Foodstuffs is the franchisor in the North Island of supermarkets, grocery stores, and wholesalers under the PAK'nSAVE, New World, Four Square, and Gilmours brands. The stores are owned and operated by local grocers who are members of the Foodstuffs cooperative.

With the exception of those in licensing trust areas, all Foodstuffs supermarkets hold alcohol off-licences. And most Foodstuffs grocery stores also have off-licences.

Foodstuffs also has an ownership interest in Liquorland Limited, the franchisor of the Liquorland branded specialist alcohol retailers. But we write here on behalf of Foodstuffs and our supermarkets and grocery stores.

As a proudly 100% Kiwi owned and operated businesses, Foodstuffs and our counterpart in the South Island have grown from humble beginnings to become some of New Zealand's biggest grocery distributors. Our stores are active members of their communities and, as small, medium, and large employers, they continuously strive to give back by sponsoring and giving support to a wide range of charitable initiatives, sports teams, and schools.

Foodstuffs' stores in Rotorua are:

- Rotorua PAK'nSAVE
- West End New World
- Edmund Road Four Square
- Fordland Four Square
- Ngongotaha Four Square
- Selwyn Heights Four Square
- Te Ngae Four Square
- Western Heights Four Square

How we ensure our stores are responsible retailers of alcohol

Foodstuffs works hard to ensure that it, and every one of its licensed stores, is a responsible seller of alcohol. As a business, we ensure our stores understand fully their obligations and wider responsibilities under the Sale and Supply of Alcohol Act 2012 (**Act**) and its regulations.

Before a new employee can sell alcohol to customers, they must complete comprehensive induction training which teaches the employee about their obligations and responsibilities under the law. All employees must also undertake refresher courses, which they must pass. There are additional online courses which store owners can recommend to their staff and, on occasion, Foodstuffs may require employees to complete these online courses in addition to the mandatory training. After receiving training, staff are required to sign an acknowledgement stating that they understand what is required of them under the Act.

All stores' duty and relevant operation managers are required to complete their Licence Controller Qualification (**LCQ**). And Foodstuffs requires that all stores have at least two people who hold Manager's Certificates issued under the Act. As large stores, our supermarkets all have many more than two staff with their Manager's Certificates.

Our stores' point of sale systems automatically prompt the need for verification of age whenever an alcohol product is scanned. This is at all checkouts, including self-service. An alcohol product cannot be purchased without one of the store's trained checkout operators or supervisors first verifying that the purchaser is over 18.

For that verification of age, all stores have an 'Under 25: ID required' policy. This requires any purchaser who looks under the age of 25 to provide formal photo proof of their age (a valid passport, driver licence, or government recognised Kiwi Access Card). The stores all also have a strict 'party' rule. So, if any member of a group looks under the age of 25, and that person does not have formal ID to show that they are over 18, alcohol will not be sold to any member of the group.

Additionally, we have an independent programme in place where all of our stores are frequently 'mystery shopped' to ensure the policies requiring proof of age are being strictly adhered to.

The staff training also covers the requirement not to sell alcohol to anyone who appears intoxicated. Staff are trained to err on the side of caution and, if in any doubt, to refuse the sale.

To ensure strict compliance with their permitted hours for the sale of alcohol, our stores' point of sale systems automatically prevent any alcohol transactions outside of those hours.

If there was to be any failure (whether uncovered by our internal programme, a Police controlled purchase operation, or otherwise), Foodstuffs can impose heavy penalties. These may 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 any alcohol compliance failure, and the need to protect the community from unauthorised sales, our store owners are vigilant in ensuring that the Act is adhered to, in particular, the prohibitions on supply to minors and intoxicated persons.

Additional safety factors applying to our stores

Type of alcohol limited

Under the Act, our supermarkets and grocery stores are limited in the kinds of alcohol product they are able to sell. Our stores can sell only beer, wine (including cider, a form of fruit wine), and mead. Our stores cannot sell spirits or RTDs. And our stores sell only beer, wine or mead with an alcohol content below 15%. Our stores have, and actively promote, a wide range of low and zero alcohol beers and wines, and this is a growing category.

Single alcohol area restrictions

Also under the Act, our stores are required to have all displays, advertising, and promotion of alcohol within a single defined area, which cannot be at the entrance or at the checkouts. For each store, the permitted alcohol area is decided on by the District Licensing Committee (**DLC**), having regard to the purpose of limiting (so far as reasonably practicable) the exposure of shoppers to the alcohol displays. This means that the exteriors of our stores do not have any alcohol advertising.

Still further, our supermarkets and grocery stores, as such, are only able to hold alcohol off-licences under the Act because their *main* business is *not* the sale of alcohol. Their main business is of course the sale of *food and general groceries*. This means that in the great majority of transactions, alcohol is purchased from our stores as just one part of a larger basket or trolley of groceries. And our stores have no incentive to do anything but decline unsafe sales.

In the ways set out above, our supermarkets and grocery stores are quite different from specialty alcohol bottle shops.

Our feedback on the DLAP

We have set out below our feedback on specific aspects of the DLAP that are relevant to our current and potential future off-licensed stores.

By way of introduction, we consider it is important that a LAP does not need to do all the 'work' itself in terms of achieving the object of the Act (being that the sale, supply and consumption of alcohol should be undertaken safely and responsibly, and that the harm caused by the excessive or inappropriate consumption of alcohol should be minimised). What is required and appropriate for a LAP should be considered in light of the strong systems, processes, and staff training in our licensed supermarkets and grocery stores, and the statutory restrictions that already apply to them.

Also, our concern is that our licensed stores are safe and responsible sellers of alcohol, and that they provide a great place for customers to do their shopping. Therefore, we consider that what the Minister of Justice said when introducing the Act to Parliament is important:

We must achieve a balance. Addressing harm must be weighed against the positive benefits associated with responsible drinking. The Government's approach is, therefore, a considered, integrated, and balanced package that targets harm without penalising responsible drinkers.

Off-licence conditions focus area one: Location of premises holding off-licences by reference to proximity to sensitive facilities

We do not agree with the proposals in the DLAP that there should continue to be an exclusion against any new licences being granted outside the Inner City within a 200-metre radius of an education facility or marae, unless the RDLC or ARLA is satisfied, that is appropriate to do so.

In our view, the distance should be reduced to a 50-metre radius for grocery stores and supermarkets.

Supermarkets and grocery stores do not have the sale of alcohol as their main business, they cannot sell spirits, RTDs or very high alcohol content products, they are required to have all alcohol contained in a single alcohol area which limits shoppers' exposure, and, importantly, grocery stores and supermarkets cannot have any alcohol advertising or banding on the exterior of their building.

Of course, even with the exception, no supermarket or grocery store will be able to actually obtain an off-licence unless the DLC is satisfied of all the matters set out in the Act, including that the licence would not be inconsistent with the object of the Act. The DLC is best placed to consider the specifics of any application, including the particular nature of the premises and any 'sensitive facility', the physical relationship between the two, and any measures able to be taken to ensure safe and responsible trading. By contrast, any 'one size fits all' policy risks creating debate (such as whether the 50 metres finishes at the 'boundary' of a licensee's building or from their carpark or yard). Such debates can be both unproductive and distracting from the substantive interests of the community.

Further, land suitable for development of new supermarkets or grocery stores is often limited. If there was to be no applicable exception, communities in Rotorua may miss out on the benefit of investment in new supermarkets or grocery stores. Although the DLC would not, in law, be absolutely bound by the proposed 'sensitive facility' policy, without an *express* exception there is likely to be insufficient commercial certainty for investment.

The DLC is best placed to consider the specifics of facilities of all types in a locality where an off-licence for a supermarket or grocery store is proposed.

The DLAP also suggests, when applying for an off-licence in respect of a premises which is less than 200 metres from a sensitive facility, there is a requirement for 'pre-application engagement with persons managing any such sensitive facility.'

It is not completely clear to us what is intended by this. In any event, as Council may be aware, the courts conclusively determined in the legal proceedings over Auckland Council's LAP that the Act does not permit a policy on what information must be provided to the DLC for it to consider with any licence application. Auckland Council proposed requiring 'Local Impacts Reports' for certain applications. The High Court determined that such a policy was *ultra vires*, being outside the Council's power under section 77 of the Act. That decision was not changed by the Court of Appeal or the Supreme Court and the proposed policy was removed from Auckland Council's LAP. Of course, although there is no longer a right of appeal against elements of a LAP, they are still required to comply with the law and the right to judicial review remains.

Off-licence conditions focus area two: prohibitions and restrictions on issuing further off-licences

The DLAP would, from the date the policy comes into force, prohibit any new off-licences from being issued for a period of 36 months. After the end of the 36 month period, the DLAP proposes that the presumption will be that any new off-licence application should be refused.

Whilst we acknowledge that poorly managed off-licence premises are problematic and do not satisfy the object of the Act, we consider that this would be an inappropriate and unhelpful policy in addressing this issue.

Supermarkets and grocery stores provide a valuable and needed service for growing communities. A blanket policy against the issue of off-licences for all types of premises could lead to a lack of future investment in new supermarkets or grocery stores, whether to add to or replace older existing stores. This is particularly as new grocery stores in an area frequently attract other investment in valuable retail and other services. Our stores draw customers from areas much

wider than just their immediate surrounding locations. This creates vibrancy in an area and brings customers to other surrounding retail and venues.

Therefore, we consider that if the proposed policy is to be introduced, there should be an express exception for supermarkets and grocery stores – provided the DLC is satisfied that the licence would not be inconsistent with the object of the Act.

This exception would not open the door for any poor-quality licensees. The recent amendment of the Act made by the Sale and Supply of Alcohol (Community Participation) Amendment Act 2023, provides a more robust application process, which makes it easier for community members to object to any new applications. Therefore, it is already harder for applicants to satisfy the DLC that they should be granted an off-licence.

On the other hand, this policy would allow off-licensees who are already operating in Rotorua to essentially lock in their position. By stopping other, potentially better operators from obtaining licences, poor quality licensees will be allowed to continue to operate and have a monopoly on off-licences in Rotorua.

The proposed policy could also lead, inadvertently, to the diversion of investment away from Rotorua. When considering whether to build and develop new stores, which involves a significant investment, we consider the ability of any new store to compete with others in the area. If a new store is unable to obtain an off-licence, it will likely not be able to compete, and the investment will not be made. As noted above, Foodstuffs is currently intending to open a new store at 312 – 326 Te Ngae Road, Ngapuna, Rotorua, at a future date. Supermarkets and grocery stores are desirable for growth, including adding jobs. And, with the standards of operation that Foodstuffs' stores exemplify, we consider that our stores are a positive addition to their respective communities.

The proposed exception would not lead to any proliferation of new off-licences. The main business of supermarkets and grocery stores is the sale of food and other groceries. So new stores will only be developed where there is a sufficient community demand for non-alcohol products.

The wording of the proposed policy is also problematic. After the proposed temporary freeze, the DLAP says that there will be a rebuttable presumption against the issuing of any new off-licences. When considering whether the presumption is rebutted, the RDLC or ARLA should have regard to 'information provided, and representations made, by the applicant as well as any reports on the application made by the Police, Medical Officer of Health and/or the Inspector and any objections to the application.' In our view, this risks suggesting to the DLC that these are the only criteria which should be considered when deciding whether to permit a new off-licence. However, the criteria which the DLC or ARLA must have regard to are listed in section 105 of the Act. Therefore, if the Council does not remove this proposed policy from the DLAP, it should be made clear that the DLC or ARLA must have regard to all the criteria in the Act.

In summary, the proposed policy, at its worst, will act to lock in those poor-quality operators who already have off-licences and restrict good quality operators from obtaining new off-licences. However, if this policy is abandoned, the robust application process, which is implemented by the Act is a sufficient safeguard to prevent new licensees who are not suitable from obtaining an off-licence and to permit good-quality operators from entering the market.

Off-licence conditions focus area three: maximum trading hours for premises holding off licences

The existing Rotorua Lakes LAP allows maximum trading hours for off-licence premises from 7:00am to 10:15pm from Monday to Sunday. Between 11 December and 24 December, the maximum trading hours for off-licence premises is extended to between 7:00am to 11:00pm.

The DLAP proposes a significant reduction to the maximum trading hours to between 7:00am and 9:00pm. The DLAP also removes the allowance for extended trading hours between 11 December and 24 December.

All but one of our grocery stores and supermarkets open at 7am in the morning. PAK'nSAVE Rotorua, New World West End and Four Square Te Ngāe have closing times of 9pm and the other off-licensed stores close at either 7:30pm or 8pm. As such, sometimes our customers are still completing their purchases at 9pm, particularly at PAK'nSAVE Rotorua and New World West End so that the store in fact shuts a little later.

We consider that the maximum off-licence trading hours under the current LAP should be retained, at least for supermarkets and grocery stores.

We are not aware of any evidence that would justify the proposed change in the maximum permitted closing time, from 10:15pm to 9pm.

Of course, the relevant issue is not whether some alcohol purchased from supermarkets or grocery stores may be later consumed to excess or inappropriately. And the proposed policy cannot be justified by simply saying that reduced trading hours might lead to reduced *overall* alcohol sales and therefore consumption. On the contrary, it would only be reasonable to prohibit the sale of alcohol from supermarkets and grocery stores after 9pm (but before 10:15pm) if there was evidence that such sales at those times *as opposed to at other times* leads to alcohol-related harm. We do not consider there is evidence to that effect.

It is an important consideration that the trading hours specified in a LAP are only the *maximum* possible. In any given individual case the DLC can impose more restrictive hours when that is appropriate to address specific concerns with alcohol-related harm. Therefore, the maximum hours adopted in Council's LAP should take into account the need to provide options and flexibility. They should be considered within the context of Rotorua's *most* suitable and responsible licensees and the need to provide for *all* the community, as well as flexibility for future growth, development, and socio-economic and other changes in the City.

Although there is no longer a right of appeal against elements of a LAP, they are still required to comply with the law. In particular, as part of the system of control over the sale and supply of alcohol, elements of a LAP must be *reasonable*, in accordance with the purpose of the Act stated in section 3. The courts have confirmed that, to be reasonable, a proposed restriction must be proportionate. While Council is entitled to take a precautionary approach, it cannot impose restrictions without a sufficient evidential basis establishing a real and appreciable likelihood that the restrictions will assist to minimise the harm from excessive or inappropriate consumption of alcohol. Nor would it be reasonable to impose a restriction when the adverse impact on responsible sellers and consumers would be disproportionate to the likely benefits. In the proceedings relating to the Auckland Council PLAP, the Supreme Court rejected an argument that there could be a sole focus on minimisation of alcohol-related harm. The Court confirmed that the interests of responsible sellers and consumers were to be considered, including in particular shopper convenience. Further, the courts have confirmed that a restriction will not be reasonable if it is likely to have no more than a marginal contribution to minimising harm.

As the population expands, particularly in the summer months, due to local and international tourism, there should be some flexibility in the maximum trading hours to allow for the demands that come with the increased population. One way in which grocery stores and supermarkets can address this increased is opening hours. Grocery stores and supermarkets would be less likely to stay open beyond the maximum hours for which they are permitted to sell and supply alcohol. Thus, by being less flexible, the proposed changes may make Rotorua less attractive as a holiday destination if they are not able to provide services such as grocery stores and supermarkets at times which are expected and appropriate in the circumstances.

However, if the DLC does not accept our submission that there is limited evidence to support the proposition that alcohol-related harm from the consumption of alcohol is increased by the sale of alcohol in supermarkets and grocery stores after 9pm, at the very least, some flexibility should be allowed with respect to the proposed maximum trading hour of 9pm. We propose that, at a minimum, the latest time for the sale and supply of alcohol be at 9:15pm to allow those customers who are in the process of finishing and paying for their groceries to do so. This would avoid circumstances in which customers can become frustrated by a strict application of the 9pm limit for the sale and supply of alcohol. This small extension would ensure the safety of the staff of Foodstuffs' stores and customers from those who may be angered by a refusal to sell and supply them alcohol strictly at 9pm.

Similarly, we submit that any new LAP should retain the current exception to maximum trading hours which permits the sale and supply of alcohol from 7am to 11pm from Monday to Sunday between 11 December and 24 December. Some flexibility over the Christmas period for the sale and supply of alcohol would make Rotorua an attractive destination.

Proposed restrictions on deliveries after remote sales

The DLAP proposes a policy that for remote sales of off-licence alcohol, 'must not be dispatched for delivery between 9:00pm and 7:00 am the following day.'

This proposed policy would be *ultra vires* and unlawful. It is not within Council's power under section 77 of the Act.

Section 77 lists the only matters on which a LAP may have a policy. The section expressly states that there can be 'no others'. The list of permitted matters includes 'trading hours'. Sections 45 and 46 then prescribe the effect of a LAP element setting such maximum trading hours. Specifically, no alcohol is allowed to be sold or supplied on licensed premises outside of the maximum trading hours. However, as recognised in the DLAP, remote sales are expressly exempt (as per section 49 of the Act). Remote sales can be made at any time on any day. Further, maximum trading hours do *not* apply to *deliveries*. And the list of matters on which a LAP can have a policy does *not* include *delivery* times. Therefore, the only restrictions on delivery times are as set out in sections 48 and 59(1) and these cannot be altered by a LAP.

Off-licence conditions focus area four: Discretionary conditions for off-licences

The DLAP proposes that the DLC and ARLA may impose a number of discretionary conditions on any new off-licence or renewed off-licence, which it categorises as mandatory or optional.

The wording of the should make clear that the imposition of a discretionary condition pursuant to section 116 or 117 of the Act must remain a discretion. The current wording causes confusion and may result in the DLC or ARLA from imposing the 'mandatory conditions' on all off-licences.

Foodstuffs does not oppose the discretionary conditions proposed in the DLAP, provided the 'mandatory conditions' are conditions which must be considered by the DLC and not discretionary conditions which *must* be imposed on and new off-licence or renewed off-licence.

Thank you

Thank you again for the chance for Foodstuffs to provide feedback on Council's DLAP.

We would be happy to provide any further information that might assist Council's consideration.

And we would welcome the opportunity to present our submission to the Council in its hearing, which we understand is scheduled for 10-11 April 2025.

Kind regards,



Julian Benefield
General Counsel and Company Secretary



M: 
35 Landing Drive, Mangere, Auckland 2022, DX Box CX 15021

Submitter – Hospitality New Zealand



Hospitality New Zealand

TO ROTORUA LAKES COUNCIL

**SUBMISSION ON
LOCAL ALCOHOL POLICY 2025**

21/03/2025

CONTACT DETAILS: Hospitality New Zealand
Contact: Luke van Veen
Central North Island Regional Manager
Phone: [REDACTED]
Email: [REDACTED]
www.hospitality.org.nz

About Hospitality New Zealand:

1. Hospitality New Zealand ("Hospitality NZ") is a member-led, not-for-profit organisation representing around 2,500 businesses, including cafés, restaurants, bars, nightclubs, clubs, commercial accommodation, country hotels and off-licences. Our vision is to see hospitality recognised and celebrated for its contribution to Aotearoa, attracting fresh talent and generating sustainable returns for businesses and communities.
2. Hospitality NZ has advocated on behalf of the hospitality and tourism sector for over 120 years. We support and improve the hospitality industry in Aotearoa New Zealand through advocacy, training, connection, and support. We want to create a vibrant, sustainable and thriving hospitality sector that benefits businesses, employees, economies and communities. We aim to empower hospitality businesses with the knowledge, resources, and partnerships they need to succeed and contribute positively to their communities.

1. This submission relates to the Local Alcohol Policy 2025.

2. Enquiries relating to this submission should be referred to Luke van Veen, [REDACTED]
[REDACTED]

General Comments:

3. Hospitality New Zealand welcomes the opportunity to comment on the Rotorua Lakes Councils Local Alcohol Policy 2025.
4. We commend Rotorua Lakes Council staff for the pre-consultation engagement with industry stakeholders and their willingness to listen throughout the process, and we can only urge councillors to do the same.

Off License Policy options:

5. Density: Hospitality New Zealand is opposed to the Council's preferred choice of Option 2. A blanket temporary freeze on all off-licences for the next three years is not a lasting solution. It is our view that the District Licensing Committee (DLC) should be assessing each application on its own merits, as is required by the Act. If a license negatively impacts amenity and good order to a large degree, it should not be granted. Hospitality New Zealand supports **Option 1**: Status quo, this option allows for the ability for businesses to grow within areas of the city that are not over-saturated with off-licences, to support new breweries and distilleries that may choose different locations within the city they want to open in and to retain decision-making on a case-by-case basis.
6. Closing Hours and Deliveries: Hospitality New Zealand Supports the Council's **option 2** with a 9pm closing time. Hospitality NZ is concerned that the wording of the policy does not make it clear how the LAP will impact wholesalers and their delivery hours. Wholesalers hold off-

licences and if they cannot dispatch their products until 7am there will be unnecessary delays and operational stress on business. Our recommendation is that the LAP needs to have the appropriate wording to only capture the off-licences this part of the policy is intended to capture.

7. Sensitive sites: Hospitality New Zealand disagrees with the inclusion of "residential activity" to the list of sensitive sites in option 2; the Public can oppose a license through the public objection process. As a commercial or industrial area is resourced consented to have these types of businesses, this should be considered when council approves those consents – if residential boundaries come in contact with the commercial area, they will be within the 200m threshold of sensitivity.
8. Discretionary conditions: Hospitality New Zealand is concerned around the wording or lack of clarity in some of these conditions and without such clarity, consultation needs to be reconsidered. For example, what restrictions are on single serve? Craft beer is often served in a 1L squeezer, or 450ml cans, and with this condition they would not be able to sell these. Across all discretionary conditions, we believe more clarity should be provided on what is considered in and out of scope so there is less subjectivity applied by a DLC.

On License Policy options

9. Trading hours: HNZ is in opposition to Option 2 regarding earlier closing times within the inner city. We do not agree that controlled environments such as on-licenses are the major cause for fights and homelessness vandalism. An inner city such as Rotorua that attracts international travellers and events to its city needs to be focused on looking forward and ensuring the offering is enticing these events and companies through a vibrant hospitality offering. **Option 1** and maintaining the status quo is what HNZ supports.
10. Sensitive sites: Hospitality New Zealand disagrees with the inclusion of "residential activity" to the list of sensitive sites in option 2; the Public can oppose a license through the public objection process. As a commercial or industrial area is resourced consented to have these types of businesses this should be considered when council approved that consent. As if residential boundaries come in contact with the commercial area they will be within the 200m. HNZ is in support of the Council's preferred option, **Option 1**
11. Discretionary Conditions: Hospitality New Zealand Supports **Option 1** as Council's preferred option

Club Licence Policy options

12. Discretionary conditions: HNZ is in support for maintaining the status quo, Council's preferred **Option 1**.
In addition to this we'd like to raise our concern around Option 2 and how a condition such as "a duty manager to be present during busy periods (50+)" is being considered here. This would be operationally impractical for clubs and is overriding the Act's statements on what is required for a club license to be issued and compliant. Given the fluctuating nature of club

rooms, summoning a duty manager when more than 50 people are present is an arbitrary measure and doesn't reflect operational realities in hospitality.

Conclusion:

13. We thank the Rotorua Lakes Council for the opportunity to provide input into the consultation.

14. We would be happy to discuss any parts of this submission in more detail, and to provide any assistance that may be required.

Submitted –General Distributors Limited (Woolworths)



31 March 2025

Attn: Local Alcohol Policy
Rotorua Lakes Council
DX Mailbox (JX 10503)
ROTORUA 3046

By email: letstalk@rotorualc.nz

SUBMISSION ON THE ROTORUA DRAFT LOCAL ALCOHOL POLICY 2025

Summary

1. As an off-licence holder in Rotorua, General Distributors Limited ("**GDL**") welcomes the opportunity to submit on the Rotorua Lakes Council Draft Local Alcohol Policy 2025 ("**DLAP**").
2. While GDL supports the objectives of minimising alcohol-related harm in the district and the use of local alcohol policies, it has significant concerns with the DLAP. In particular, GDL:
 - (a) Strongly opposes the introduction of a three-year freeze on the grant of new off-licences in Rotorua (and a rebuttable presumption against new off-licences thereafter). GDL seeks that the policy be deleted from the DLAP, on the basis that it is a disproportionate response in the absence of evidence that it has a reasonable likelihood of reducing alcohol-related harm in the district.
 - (b) Opposes the proposed reduction in maximum off-licence trading hours to 7am to 9pm. GDL does not consider that the Council has provided sufficient evidence to justify that restriction. GDL seeks the off-licence hours in the current LAP of 7am to 10.15pm (and to 11pm during the period of 11 December to 24 December) be retained for supermarkets and grocery stores.
 - (c) Seeks amendments to the policy titled "Discretionary conditions of off-licences" to remove the "mandatory conditions" as they are not required by the Sale and Supply of Alcohol Act 2012 ("**Act**") and cannot be imposed as of right. The DLAP also needs to be amended to ensure the correct legal test for discretionary conditions is followed by decision-makers considering whether to impose them on a licence.
 - (d) Is concerned about the requirement for new off-licence applicants to undertake engagement with persons managing any sensitive facilities located less than 200 metres from the boundary of the premises. GDL considers the ability to consider sensitive facilities is already provided for under the Act when assessing the amenity and good order of the locality.
3. GDL wishes to be heard in relation to this submission.

GDL as an off-licence holder

4. GDL is a wholly owned subsidiary of Woolworths and is responsible for operating Woolworths stores nationwide. GDL owns and operates 190 supermarkets under the Woolworths (formally operating as Countdown supermarkets) and Metro banners, and 4 "eStores" across New Zealand. Another subsidiary of Woolworths, Wholesale Distributors Limited, is the franchisor

for over 70 SuperValue and FreshChoice supermarkets, which are locally owned and operated businesses.

5. As a holder of over 175 off-licences in New Zealand, GDL is an experienced licence holder and is committed to being a responsible retailer of alcohol. GDL acknowledges that it has a shared responsibility to prevent alcohol-related harm and ensure that consumption of alcohol is undertaken safely and responsibly.
6. GDL holds two off-licences in the Rotorua district:
 - (a) Woolworths Fairy Springs (which has trading and opening hours of Monday to Sunday 7am to 10pm); and
 - (b) Woolworths Rotorua which trades Monday to Sunday 7am to 10pm but has licensed hours of Monday to Sunday 7am to 10.15pm (except during the period of 11 December to 24 December where it trades Monday to Sunday 7am to 11pm).

Temporary freeze on new off-licences

7. The DLAP proposes to introduce a three-year freeze on the grant of new off-licences in the Rotorua district from the date the policy comes into force, and a rebuttable presumption that any new off-licence applications should be refused thereafter.¹ In deciding whether that presumption is rebutted, the DLAP states the District Licensing Committee ("**DLC**") and the Alcohol Regulatory and Licensing Authority ("**Authority**") should have regard to "information provided, and representations made, by the applicant as well as any reports on the application made by the Police, Medical Officer of Health and/or the Inspector and any objections to the application".²
8. This is a significant shift from the current LAP which does not restrict the number or location of new off-licences in the district. A restriction in a LAP may be justified on the basis of there being a reasonable likelihood that it will reduce alcohol-related harm (and even if there is a reasonable likelihood, that does not preclude a conclusion that the restriction is nonetheless unreasonable in light of the object of the Act).³ GDL does not consider the Council has provided evidence or reasoning to demonstrate that. The Council has only said in general terms that this policy will reduce alcohol-related harm and focus efforts on reducing harm from existing premises.⁴ Council has not presented any specific evidence to show a three-year freeze on new off-licences in all of Rotorua (and a rebuttable presumption thereafter) will have a reasonable likelihood of reducing alcohol-related harm.
9. Further, the background to this policy in the Statement of Proposal focuses on off-licensed premises other than supermarkets. The Council states:
 - (a) "[T]he response to the Rotorua community alcohol survey demonstrated that many in the community feel there are too many bottle stores".⁵
 - (b) "Rotorua recently set a national record for the number of objections to a new bottle store off-licence application".⁶

¹ Draft Local Alcohol Policy 2025, page 8.

² Draft Local Alcohol Policy 2025, page 9.

³ *Woolworths New Zealand Limited v Auckland Council* [2023] NZHC 45 at [84].

⁴ Statement of Proposal: Local Alcohol Policy 2025, page 9.

⁵ Statement of Proposal: Local Alcohol Policy 2025, page 7.

⁶ Statement of Proposal: Local Alcohol Policy 2025, page 7.

10. GDL considers the freeze on all off-licences, including supermarkets (which only sell beer, cider, wine and mead in addition to a wide range of food and household items), is a disproportionate response in light of the evidence which points towards bottle stores being problematic.
11. The introduction of a temporary freeze on new off-licences does not account for population growth in the next three years (and beyond that if the rebuttable presumption is retained in the DLAP) and would have serious implications for businesses like GDL which provide important facilities for communities. As Rotorua grows, more supermarket providers may seek to establish in the district to support the population's needs by providing access to groceries. Such supermarkets should be able to offer a full range of goods and services, including a range of alcoholic and low-alcoholic beverages by holding a licence. Notwithstanding that GDL does not consider there is evidence to justify the freeze at all, GDL also considers this policy fails to recognise the difference in products that supermarkets sell (eg they do not sell alcoholic RTDs or spirits, like bottle stores).
12. The Act contemplates a system that provides for reasonable opportunities for the safe and responsible sale and supply of alcohol (whilst also minimising alcohol-related harm). It is unreasonable to exclude a responsible retailer like GDL, who has extensive experience as a licensee and robust policies in place to ensure the responsible sale and supply of alcohol, from obtaining new off-licences for its stores in the district.

Relief sought

13. GDL seeks the policy titled "Prohibitions and restrictions on issuing further off-licences"⁷ be deleted from the DLAP.

Reduction in maximum trading hours

14. The current LAP limits trading hours to 7am to 10.15pm, except in the period 11 December to 24 December when closing hours are 11pm. The DLAP seeks to further reduce the maximum off-licence trading hours to 7am to 9pm.
15. This proposed reduction in trading hours will (if implemented) impact GDL's operations by reducing the trading hours at Woolworths Rotorua and Woolworths Fairy Springs by one hour per day. GDL is concerned this will cause disruption and inconvenience to customers carrying out their grocery shops between 9pm to 10pm. Some customers, such as shift workers, complete their shopping late at night and should have access to the full range of products available at GDL's stores. The Supreme Court has acknowledged shopper inconvenience may be material to the assessment of whether a restriction in a LAP is unreasonable in light of the object of the Act.⁸
16. GDL also does not consider the reduction in trading hours is reasonable or properly supported by the evidence.⁹ The Council only provided one study which it says "shows that reduced trading hours for off-licences has the potential to minimise alcohol-related harm".¹⁰ The study was undertaken in Australia in 2018 and focused on the reduction in closing times of on-

⁷ Draft Local Alcohol Policy 2025, pages 8-9.

⁸ *Woolworths New Zealand Ltd v Auckland Council* [2023] NZSC 45, [2023] 1 NZLR 113 at [85].

⁹ The extent of the reasoning provided by Council is that "reducing trading hours will reduce alcohol-related harm late at night".

¹⁰ Statement of Proposal: Local Alcohol Policy 2025, page 7.

licensed venues and bottle stores.¹¹ GDL does not consider it provides any justification for reducing the trading hours of supermarkets in the Rotorua context.

Relief sought

17. GDL seeks the policy titled "Maximum trading hours for premises holding off-licences and deliveries"¹² be amended to retain the maximum trading hours for supermarkets and grocery stores in the current LAP as follows (amendments are shown in red underline and deletions are shown in red ~~strikethrough~~):

No off-licence (except an off-licence for a supermarket or grocery store) may be issued or renewed with trading hours that exceed Monday to Sunday 7.00am to 9.00pm (subject to section 48 of the Act). Remote sellers are excluded from this policy, subject to section 40 of the Act.

For supermarkets and grocery stores, the following trading hours apply:

- Monday to Sunday (except during the dates specified below): 7.00am to 10.15pm
- Monday to Sunday, 11 December to 24 December: 7.00am to 11.00pm

[...]

Discretionary conditions for off-licences

"Mandatory conditions" in the DLAP

18. The DLAP provides a list of "mandatory conditions" to be applied to off-licences being:¹³
- (a) provision of a social responsibility policy;
 - (b) signs detailing statutory restrictions on the sale of alcohol to minors and intoxicated persons adjacent to every point of sale;
 - (c) maintenance of an alcohol-related incidents book;
 - (d) application of the CPTED principles;
 - (e) restrictions on the display of product or price specials on the exterior of premises;
 - (f) restrictions on the use of flags, sandwich boards or any mobile signage; and
 - (g) no sales using "buy now pay later" schemes.
19. Apart from the condition listed in paragraph 18(b) above which is required by section 116(1)(a) of the Act, none of the other conditions are mandatory under the Act.¹⁴

¹¹ The study concluded "the simulations demonstrated that the late-night trading hours of licensed venues and bottle shops are a key determinant of the rates of alcohol-related harms".

¹² Draft Local Alcohol Policy 2025, page 9.

¹³ Draft Local Alcohol Policy 2025, page 9.

¹⁴ Sale and Supply of Alcohol Act 2012, section 117(1).

20. The LAP does not replace the exercise of the DLC's discretion when considering whether to grant or renew an off-licence and whether to impose any other discretionary conditions on the licence that are reasonable in light of the application. The inclusion of a policy about discretionary conditions in the DLAP does not make those conditions "mandatory", nor give the DLC or the Authority the ability to impose those conditions on new and renewed off-licences by default (without applying the appropriate to the facts of the application before it, to determine whether they are reasonable and consistent with the Act in the circumstances).¹⁵ The Authority has said:¹⁶

The LAP is one of the matters to be considered under s 105, when granting a licence. But a LAP cannot seek to do more than indicate 'at a policy level' what kinds of discretionary conditions a DLC might consider in respect of individual applications.

21. While the Council can include a policy about discretionary conditions in the DLAP, it cannot direct the DLC to impose the conditions listed in paragraph 18 on all off-licences. To do so would be unlawful.

"Optional conditions" in the DLAP

22. The DLAP also provides a list of "optional conditions" to be applied to off-licences being:¹⁷

- (a) the installation and operation of CCTV cameras;
- (b) provision of effective exterior lighting;
- (c) restrictions on single sales;
- (d) restrictions on the display of RTDs at the principal entrance or within 3 metres of the front window of a store;
- (e) limiting the visibility of internal alcohol-related displays from outside the premises;
- (f) restrictions on marketing and promotion of non-alcoholic products that pose a high risk of alcohol-related harm (eg drinking games); and
- (g) restrictions on any irresponsible promotions.

23. The Council considers that "adding these conditions to the LAP will enable the DLC to apply these conditions on licences more easily, however they will still be applied on a case-by-case basis".¹⁸

24. These proposed discretionary conditions are highly prescriptive and will need to be carefully considered in light of each application and the legal test under section 117 of the Act. Whether a discretionary condition meets section 117 is a fact-specific assessment to be weighed against considerations relevant to the application at hand.¹⁹ Reasonableness depends on an objective assessment of whether there is a rational and proportionate connection between the identified risk or benefit when weighed against all relevant considerations.²⁰

¹⁵ *Foodstuffs South Island Ltd v Dunedin City Council* [2016] NZARLA PH 21 at [93].

¹⁶ *Foodstuffs South Island Ltd v Dunedin City Council* [2016] NZARLA PH 21 at [93].

¹⁷ Draft Local Alcohol Policy 2025, page 9.

¹⁸ Statement of Proposal: Local Alcohol Policy 2025, page 12.

¹⁹ *Christchurch Medical Officer of Health v J & G Vaudrey* [2015] NZHC 2749 at [103].

²⁰ *Christchurch Medical Officer of Health v J & G Vaudrey* [2015] NZHC 2749 at [104].

25. GDL acknowledges that the Statement of Proposal says each condition will be applied on a case-by-case basis.²¹ However, that is not clear in the current drafting of the DLAP and GDL considers further amendments are required to ensure any discretionary conditions are only imposed after having considered the specific application and determining that the test in the Act is met.

Relief sought

26. GDL considers the following amendments are required to the policy titled "Discretionary conditions of off-licences" (amendments are shown in red underline and deletions are shown in red ~~strikethrough~~):

In accordance with sections 116 and 117 of the Act, the DLC and ARLA may impose discretionary conditions (in addition to the conditions required by sections 112 and 116(2) of the Act) on any new off-licence or renewed off-licence. For the avoidance of doubt, the suggested discretionary conditions in this policy are not mandatory and should not be automatically applied as a matter of course. The DLC and ARLA must apply the test under section 117 of the Sale and Supply of Alcohol Act, which directs that a discretionary condition must not be inconsistent with the Act and must be reasonable. Discretionary conditions may be imposed including about the following matters:

Mandatory conditions

- provision of a Social Responsibility Policy that the licensee must develop, display and maintain to demonstrate the measures in place at the premises to minimise alcohol-related harm;
- ~~signs detailing statutory restrictions on the sale of alcohol to minors and intoxicated persons adjacent to every point of sale;~~
- [...]

Optional conditions

[...]

27. In addition to the proposed amended introductory text, GDL considers the deletion of the headings "Mandatory conditions" and "Optional conditions" from this policy will clarify that all the listed conditions are discretionary conditions which may be considered in light of the circumstances of each application. GDL also seeks the condition listed in paragraph 18(b) above be deleted from this policy given it is the only mandatory condition under the Act.

Location of new off-licences in proximity to sensitive facilities

28. The DLAP retains the wording from Policy 6.1 of the current LAP which states no new off-licences are to be granted outside the Inner City and within a 200-metre radius of any education facility or marae (unless the DLC or the Authority is satisfied it is appropriate to do so).²²

²¹ Statement of Proposal: Local Alcohol Policy 2025, page 9.

²² Draft Local Alcohol Policy 2025, page 8.

29. The DLAP goes further and proposes:
- (a) Amendments to the definition of "sensitive facilities" to add places of worship, residential activity, youth centres, hospitals, rehabilitation facilities, community facilities (as defined in the Rotorua District Plan), urupā and cemeteries.²³ (The current LAP only includes education facilities and marae.) The Council states "during pre-consultation engagement many stakeholders felt the definition of sensitive site facilities should incorporate a wider range of community facilities".²⁴
 - (b) A requirement for all new off-licence applicants to conduct pre-application engagement with the managers of any existing sensitive facilities located within 200 metres of their premises.²⁵
30. GDL is not opposed to the DLAP's broader definition of "sensitive facility" in principle. However, it is concerned with the proposed requirement for applicants to conduct pre-application engagement. While the LAP may include policies on the location of licensed premises by reference to proximity to premises or facilities of a particular kind,²⁶ GDL considers the inclusion of a policy requiring pre-application engagement with facilities of a particular kind goes beyond what a LAP is permitted to do.
31. Also, there is no requirement under the Act for new off-licensees to engage with sensitive facilities prior to applying for a licence. However, it is well established in case law that knowledge of the locality or potential problems associated with the sale and supply of alcohol goes to whether the applicant is suitable to hold a licence.²⁷
32. Given this, it is already incumbent on new off-licensees to be aware of the locality in which they seek to locate (including sensitive facilities within the vicinity) and to consult with affected communities where it is appropriate to do so, as such matters go towards their suitability and will be considered by the DLC in deciding whether to issue a licence. GDL carefully considers where to establish new supermarkets, and in doing so considers the community in which it seeks to locate who will utilise the new store. It does not consider a requirement to consult with certain sensitive facilities is necessary.
33. GDL is also concerned that there is no clear guidance in the DLAP on:
- (a) the level of engagement required with each facility (although the Statement of Proposal states that either a letter or hosting a meeting is required, this is not clear in the DLAP and in any case it is unclear what sending a letter would achieve in terms of the object of the Act);²⁸
 - (b) how much weight the DLC can, or should attribute to evidence of engagement with sensitive facilities in the context of an application; and
 - (c) the consequences for a new off-licence application if the persons consulted object to the applicant's proposal.

²³ Draft Local Alcohol Policy 2025, page 5.

²⁴ Statement of Proposal: Local Alcohol Policy 2025, page 7.

²⁵ Draft Local Alcohol Policy 2025, page 8.

²⁶ Sale and Supply of Alcohol Act 2012, sections 77(1)(b)-(c).

²⁷ *Re R S Dhillon Ltd* [2013] NZARLA PH 920 at [49].

²⁸ Statement of Proposal: Local Alcohol Policy 2025, page 11.

Relief sought

34. GDL seeks the policy titled "Location of premises holding off-licences by reference to proximity to sensitive facilities" be amended to remove the requirement to demonstrate pre-application engagement with sensitive facilities within 200 metres of a new off-licensed premises (amendments are shown in red underline and deletions are shown in red ~~strikethrough~~):

No new off-Licence applications will be granted if the premises are to be located outside the Inner City and within a 200 metre radius of any education facility or marae, unless the RDLC or ARLA is satisfied, that it is appropriate to do so.

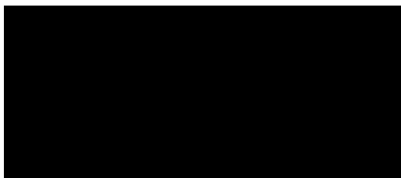
~~Applicants for any new off licence in respect of premises that is less than 200 metres from the boundary of any sensitive facility existing at the time the licence application is filed must demonstrate pre-application engagement with persons managing any such sensitive facility.~~

[...]

Relief sought

35. GDL respectfully seeks the following relief:
- (a) the deletion of the policy titled "Prohibitions and restrictions on issuing further off-licences" from the DLAP;
 - (b) amendments to the policy titled "Maximum trading hours for premises holding off-licences and deliveries" to retain the maximum off-licence trading hours in the current LAP for supermarkets and grocery stores (7am to 10.15pm, and 7am to 11pm during the period of 11 December to 24 December);
 - (c) amendments to the policy titled "Discretionary conditions for off-licences" to make it clear that these are not mandatory conditions; and
 - (d) an amendment to the policy titled "Location of premises holding off-licences by reference to proximity to sensitive facilities" to remove the requirement for applicants to undertake pre-application engagement.

Yours faithfully,



Paul Radich
General Distributors Limited

Submitter – Alcohol Healthwatch



Submission on the Rotorua Lakes Council Draft Local Alcohol Policy 2025

31 March 2025

Kia ora

Thank you for the opportunity to provide feedback on the Rotorua Lakes Council Draft Local Alcohol Policy.

We would like the opportunity to speak (virtually) to our submission.

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

Andrew Galloway
Executive Director
Alcohol Healthwatch

T:

E:

About Alcohol Healthwatch

Alcohol Healthwatch is an independent national charity working to reduce alcohol-related harm and inequities. We provide a range of regional and national health promotion services such as providing evidence-based information and advice on policy and planning matters, supporting community action projects, and coordinating networks to address alcohol-related harm such as the Cross-council Local Alcohol Policy Network.

General Comments

1. Alcohol Healthwatch commends the Council on its commitment to reviewing the 2019 Local Alcohol Policy (LAP), and we wish to acknowledge the efforts of councillors and officers in conducting this review on behalf of communities in the district, and the early engagement with key agents and stakeholders to inform this work¹.

Alcohol-related harm

2. Of all drugs available in our society, alcohol is the most harmful². Alcohol is a leading cause of preventable death, injury and ill health in Aotearoa New Zealand and a significant

contributor to the social and health inequities experienced by Māori, Pacific peoples and other impacted groups.

3. Alcohol is a component cause for more than 200 disease and injury conditions³, and is the leading behavioural risk factor for death and disability adjusted life years lost among New Zealanders aged 15 to 49 years⁴.
4. The cost of alcohol-related harm in Aotearoa has been estimated at over \$9.1 billion annually⁵. The harms are far-reaching and deeply felt by many families and communities. The Council's Local Alcohol Policy Review Research Report clearly identifies the issues and summarises the data on alcohol harm in the Rotorua Lakes district^{6 7}.

Local Alcohol Policies

5. We strongly believe that a LAP should not be considered in isolation, but should be seen as part of a cohesive package to reduce alcohol-related harm that includes alcohol ban bylaws, realistic alcohol licensing fees⁸, and alcohol-related policies as well as a LAP.
6. 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. To date, alcohol outlets in Aotearoa New Zealand have been inequitably distributed to the most deprived neighbourhoods and the unequal harms from this can be addressed through a LAP⁹.
7. By incorporating evidence-based measures to address both the physical (location) and temporal (operating hours) 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 use.

Specific comments

8. Alcohol Healthwatch supports provisions in the LAP that are aligned to the object of the Sale and Supply of Alcohol Act 2012 (the Act), that reflect the needs of the community and are supported by evidence for reducing alcohol-related harm¹⁰.
9. The review of the LAP is timely and provides an opportunity for the LAP to reflect:
 - The Sale and Supply of Alcohol (Community Participation) Amendment Act 2023¹¹,
 - The Supreme Court decision on the Auckland Council Provisional LAP¹²,
 - The changing environment and emerging issues in the Rotorua Lakes district since 2019,

- The desirability of ensuring greater consistency and synergy with LAPs (and proposed LAPs) in the Bay of Plenty and Waikato regions and across Aotearoa New Zealand, and
- The growing acceptance that a LAP can provide greater certainty and clarity for the public, licensing bodies and regulatory agencies as well as licensees.

Policies under Section 77(1) of the Act

Location of Premises

Section 77(1)(a) – Broad Areas

10. Through a LAP, territorial authorities may restrict licensed premises to a particular “broad area”, such as a commercial or industrial zone, but must first have regard to the district plan and its objectives and policies (section 78(2)(a) of the Act). We believe the review presents an opportunity to include a policy on “broad areas” with mandatory locations clearly identified where licensed premises can be established.¹³ A clearly articulated “broad areas” policy can also complement and support other policies, including the policy on the proximity to “sensitive facilities” (section 77(1)(c)) and restrictions on the issuing of further licences (section 77(1)(d)).

Section 77(1)(b) – Proximity to Other Premises

11. We recommend the inclusion of a mandatory policy preventing new licensed premises from being located in close proximity to other licensed premises. Setting a distance rule would address the harm associated with the clustering of premises and could see, for example, off-licensed premises prevented from being established within, say, 50¹⁴ or 100¹⁵ metres of an existing off-licensed premises.

Section 77(1)(c) - Proximity to Sensitive Sites

12. We support the continuation of the policy on sensitive sites, and the distance requirement preventing new off-licence premises to be within a 200 metre radius of any education facility or marae unless the District Licensing Committee (DLC) or Alcohol Regulatory and Licensing Authority (ARLA) considers it appropriate. This would include an applicant demonstrating pre-application engagement with those managing a sensitive facility, and where there has not been a substantial change in the operation of the off-licence.

13. We note that while the definition of “sensitive facility” has been expanded to include a broader range of facilities than an education facility and marae, this does not appear to be reflected in the text of the policy. We support the broader definition of sensitive sites that would now include places of worship, residential activity, youth centres, rehabilitation

treatment facilities, community facilities, hospitals (or better “health care facility”), and urupa, and we note that this broader definition is consistent with the majority of current LAPs.

14. We further recommend that the policy be extended to new on-licences (excluding cafes or restaurants) and new club-licences with applicants for those new licences to likewise undertake pre-engagement with sensitive facilities. There is a need to generally protect vulnerable users of sensitive sites from exposure to off-licence, on-licence and club licence premises and the associated negative amenity effects. Protecting vulnerable populations and users of sensitive sites can also assist to address their disproportionate and inequitable exposure to alcohol and experience of alcohol harms.

Section 77(1)(d) – Issuing of Further Licences

15. We believe that a policy on the issuing of further licences would reflect community concerns and also align with research on the relationship between the proliferation of licences and accessibility to alcohol and alcohol-related harm.^{16 17 18} We therefore strongly support the proposed temporary freeze for three years on new off-licences and the rebuttable presumption thereafter. We further recommend that a permanent freeze and/or sinking lid policy be considered for bottle shops in areas with a high socio-deprivation index.¹⁹

Maximum Trading Hours

Section 77(1)(e) – Trading Hours

16. Reducing trading hours is a key strategy for reducing alcohol-related harms²⁰. Studies have shown that hazardous drinking increases with longer hours and greater availability^{21,22}. This reality is reflected in the current trend for councils to reduce trading hours in their LAPs, particularly for off-licences. As the vast majority of alcohol is purchased from off-licences (over 80%) and often cheaply, we strongly support the decrease in trading hours proposed in the draft LAP for off-licences (including remote sale deliveries). We would recommend that the opening hours for off-licences be reduced by two hours. Off-licence trading hours of *9am to 9pm* (which is becoming the norm for LAPs) would help reduce the opportunity of hazardous drinking and “pre loading”, “side-loading” and “post loading” and consequently lessen the incidence of other harms (assault, unintentional injury, drink driving) associated with extended trading hours²³.
17. We also support the recognition that on-licences in the Inner City should have a reduction in trading hours, as the earlier closing should reduce the incidence of serious crime that

often occurs with later closing times due to people's higher levels of intoxication.²⁴ However, we recommend a later opening hour for on-licences and club licences, as longer trading hours are associated with an increase in hazardous drinking.

Discretionary Conditions

Section 77(1)(f) – Discretionary Conditions

18. We support the amendments to the discretionary conditions in the current LAP, including those labelled “mandatory” and those labelled “optional”. These include conditions that address Crime Prevention through Environmental Design (CPTED) principles, host responsibility and food requirements.
19. We strongly support the conditions that focus on off-licences, including:
 - (a) the *requirement for off-licences to have a social responsibility policy*;
 - (b) *restrictions on single sales*, as such sales generally make alcohol affordable and EW often linked to hazardous drinking by vulnerable people. However, more detail about the limitation level of alcohol needs to be included;
 - (c) *restrictions on the visibility of alcohol-related advertising and display product/price specials*, as this would reduce the exposure of children to alcohol-related advertising and promotions.²⁵ We support restricting the exterior display of product/price specials, restricting flags, sandwich boards, and mobile signage and limiting the visibility of internal alcohol-relating displays and advertising. However, we recommend that consideration also be given to restricting external advertising of alcohol products and brands in addition to product and price specials only. Exposure to alcohol advertising is a known risk factor for alcohol-related harm, contributing to both the amount consumed and frequency of alcohol use. It works on a number of levels including normalising, glamorising, and embedding alcohol consumption into day-to-day settings. Children and young people are at a greater risk from harm as their developing cognitive skills increase their susceptibility to the influence of advertising. The University of Otago *Kids'Cam* research found that New Zealand children aged 11-13 years were exposed to alcohol marketing on average 4.5 times per day. Māori and Pacific children had levels of exposure five and three times greater than European children, respectively. Research undertaken by Alcohol Healthwatch in Tāmaki Makaurau Auckland echoes the Otago University and other studies²⁶, and found that 56% of schools had at least one alcohol advertisement within 500 metres; 75% of alcohol advertisements were from nearby licensed premises; 63% of alcohol

advertisements were near low decile schools, 66% of schools had one alcohol advertisement in the radius, with the average number of advertisements near schools was two; and 78% of the alcohol advertisements were within 400 metres of the schools.²⁷ A ban on external advertising can also support CPTED and other measures by prohibiting external signage that obscures the view into/out of the premises;

(d) *restrictions on Buy Now, Pay Later (BNPL)*, as these schemes are considered an inappropriate method of payment and subvert established mechanisms to minimise harm to public health from alcohol by enticing the consumer with a much lower upfront price. The research shows that the use of BNPL services to purchase alcohol increases its perceived affordability, which can lead to greater consumption and related harms. The availability of alcohol at low alcohol prices facilitates moderate drinkers becoming heavy drinkers, and heavy drinkers transitioning to dependent drinkers. The harm associated with economic accessibility and perceived affordability of alcohol is exacerbated where alcohol is readily available in store (eg outlets in close proximity²⁸, long trading hours) and on-line (eg rapid delivery). Young adults are among the heaviest drinkers²⁹, they are currently the main consumers of BNPL, are also likely to use rapid delivery for their purchases (often without ID checks), and this makes them particularly vulnerable;

(e) *requirement for mandatory age checks on purchase and delivery*, as, for example, research conducted by Alcohol Healthwatch in Tāmaki Makaurau-Auckland showed that in 73% of alcohol orders did not request age verification on delivery; 49% of alcohol orders were left unattended (contactless) at the door; and 87.5% of delivery companies broke their own restricted items policy. Alcohol delivered without an ID check may make it easier for under 18 year olds to access alcohol and increases the chances of hazardous drinking;³⁰

(f) *restrictions on the marketing and promotion of non-alcoholic products* that pose a high risk of alcohol-related harm, such as drinking games and risky items that encourage dangerous drinking (eg beer pong cups);

20. In addition, we recommend that the following discretionary conditions be included:

(a) *Off-licences: FASD warning signage* within the alcohol area in supermarkets and grocery stores and at point of sale at bottle stores.³¹

(b) *Special licences*: we recommend the LAP include provisions that protect children and youth in the district, by not allowing special licences to be granted for *family-focussed*

events, namely those events where a significant proportion of attendees are aged under 18 years

One-way door restrictions

Section 77(1)(g) – One-way Door Policy

21. We support the continuation of a one-way door restriction for licensed premises (on-licences, club licences and special licences) in the Inner City that trade after midnight, however, these policies should be mandatory. A policy should also apply to certain on-licences, namely pubs, taverns, nightclubs, that are outside the Inner City. One-way door restrictions would help prevent a large number of people coming out of licensed premises at the same time (as would be the case with a universal maximum closing time) and the potential for intoxicated patrons migrating between venues or interacting with others with an increased likelihood of disorder and crime. These conditions also have the potential to reduce the burden on Police, ambulance and hospital services and can have a positive benefit for not only the patrons of premises but the community generally.

Conclusion

22. Alcohol Healthwatch supports the policies in the draft LAP that have added additional protections for the duration of the policy to address alcohol-related harm. We particularly support the proposed temporary freeze for three years on new off-licences and the rebuttable presumption thereafter, the decrease in trading hours, and discretionary conditions that recognise and address emerging issues such as BNPL schemes and remote sales. Strengthened measures can be effective in meeting the object of the Sale and Supply of Alcohol Act 2012 and reduce the significant burden placed on communities from alcohol-related harm.

References

- 1 In addition to consultation with Police, Medical Officer of Health and licensing inspectors, pre-engagement was conducted, for example, via a community survey with over 600 responses and targeted engagement with iwi, workshops etc. See Rotorua Lakes Council meeting 26 February 2025. Agenda item 10.2.
<https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/Meetings/Council%20Meeting/2025-02-26/public-agenda-council-meeting-26-february-2025.pdf>.
- 2 Crossin R, Cleland L, Wilkins C, Rychert M, Adamson S, Potiki T, et al. The New Zealand drug harms ranking study: A multi-criteria decision analysis. *J Psychopharmacol (Oxf)*. 2023 Jun 23; 02698811231182012. Nutt DJ, King LA, Phillips LD. Drug harms in the UK: A multicriteria decision
- 3 Rehm J, Baliunas D, Borges GL, *et al*. The relation between different dimensions of alcohol consumption and burden of disease: an overview. *Addiction* 2010; **105**: 817–43.
- 4 Institute for Health Metrics and Evaluation (IHME). GBD Compare Data Visualization 2019, New Zealand. Seattle: WA: University of Washington, 2022. <https://www.healthdata.org/data-visualization/gbd-compare>
- 5 The total societal cost of alcohol harms in 2023 is approximately \$9.1 billion based on the increased risk of morbidity and mortality, with over half (\$4.8 billion) due to fetal alcohol spectrum disorder (FASD). New Zealand Institute of Economic Research (NZIER). Cost of alcohol harms in New Zealand: Updating the evidence with recent research (2024): www.health.govt.nz/system/files/documents/publications/costs-of-alcohol-harms-in-new-zealand-2may24-v2.pdf.
- 6 Rotorua Lakes District Council. Local Alcohol Policy Review Research Report. February 2025. See particularly data in sections 7 and 8.
- 7 Environmental Health Intelligence New Zealand. Alcohol-related harm indicators: <https://ehinz.ac.nz/indicators/alcohol-related-harm/about-alcohol-related-harm/#alcohol-related-harm-indicators>
- 8 Note: Rotorua Lakes District Council sets licensing fees according to Sale and Supply of Alcohol (Fees) Regulations 2013. However, the default fees have not kept pace with the costs incurred by councils, and therefore an increasing number of councils have utilised their bylaw-making powers under the Sale and Supply of Alcohol (Fee-setting Bylaws) Order 2013 and set fees (usually 100% cost recovery) through this process.
- 9 New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No.: 114: <https://www.lawcom.govt.nz/sites/default/files/projectAvailableFormats/NZLC%20R114.pdf>
- 10 Ministry of Health New Zealand. (2024). Government Policy Statement on Health 2024-27: <https://www.health.govt.nz/system/files/2024-06/government-policy-statement-on-health-2024-2027-v4.pdf>
- 11 Sale and Supply of Alcohol (Community Participation) Amendment Act 2023, No. 60: <https://www.legislation.govt.nz/act/public/2023/0060/latest/whole.html>.
- 12 Courts of New Zealand. Foodstuffs North Island Limited v Auckland Council, Woolworths New Zealand Limited and Alcohol Regulatory and Licensing Authority – SC 140/2021 [Internet]. Wellington (NZ): Supreme Court of New Zealand; 2023 [cited 2023, Sep 18]: <https://www.courtsofnz.govt.nz/cases/foodstuffs-north-island-limited-v-auckland-council-woolworths-new-zealand-limited-and-alcohol-regulatory-and-licensing-authority>. The Auckland LAP came into force 16 September and 9 December 2024.

- 13 See for example LAPs for Napier and Hastings District Councils 2019, Matamata-Piako District Council 2023, New Plymouth and Stratford District Councils 2017, Horowhenua District Council 2020 (off-licences), Otorohanga District Council 2024, Central Hawkes Bay District Council 2019, Invercargill and Southland District Councils 2020, Hutt City Council 2025, Selwyn District Council 2017 (and 2025 draft), Porirua City Council 2025 (draft), Auckland Council 2024, Tasman District Council 2015, Tauranga City Council 2024 (no new bottle stores in dep 9 or 10), Waikato District Council 2022, Waimakariri District Council 2018, Waipa District Council 2025, Waitomo District Council 2022.
- 14 For example, see Horowhenua District Council Local Alcohol Policy 2020 – no new licences for a bottle store within 100 metres of the boundary of other licensed premises. See also Waikato District Council PLAP 2022 (under appeal) with 5 kilometres and 1 kilometre distances.
- 15 For example, see Napier City Council and Hastings District Council Local Alcohol Policy (joint) 2019 and Hauraki District Council Local Alcohol Policy 2022.
- 16 Cameron MP, Cochrane W, Gordon C, Livingston M. Alcohol outlet density and violence: A geographically weighted regression approach [Internet]. *Drug and alcohol review*. 2016;35(3):280-8: <https://doi.org/10.1111/dar.12295>
- 17 Day P, Breetzke G, Kingham S, Campbell M. Close proximity to alcohol outlets is associated with increased serious violent crime in New Zealand [Internet]. *Australian and New Zealand journal of public health*. 2012;36(1):48-54: <https://www.sciencedirect.com/science/article/pii/S1326020023017181?via%3Dihub>
- 18 Campbell CA, Hahn RA, Elder R, Brewer R, Chattopadhyay S, Fielding J, Naimi TS, Toomey T, Lawrence B, Middleton JC, Task Force on Community Preventive Services. The effectiveness of limiting alcohol outlet density as a means of reducing excessive alcohol consumption and alcohol-related harms [Internet]. *American journal of preventive medicine*. 2009;37(6):556-69: <https://doi.org/10.1016/j.amepre.2009.09.028>
- 19 See for example, Tauranga City Council. Local Alcohol Policy 2024. No new licences issued for bottle stores located within suburbs with a social deprivation index of 9 or 10.
- 20 Hahn RA, Kuzara JL, Elder R, Brewer R, Chattopadhyay S, Fielding J, Naimi TS, Toomey T, Middleton JC, Lawrence B, Task Force on Community Preventive Services. Effectiveness of policies restricting hours of alcohol sales in preventing excessive alcohol consumption and related harms [Internet]. *American Journal of Preventive Medicine*. 2010;39(6):590-604: <https://doi.org/10.1016/j.amepre.2010.09.016>.
- 21 Casswell S, Huckle T, Wall M, Yeh LC. International alcohol control study: pricing data and hours of purchase predict heavier drinking. *Alcoholism: Clinical and Experimental Research* [Internet]. 2014. 38(5):1425-31: <https://doi.org/10.1111/acer.12359>
- 22 Connor, J., Maclennan, B., Huckle, T., Romeo, J., Davie, G., & Kypri, K. (2021). 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. *Addiction*, 116(4), 788-798.
- 23 Nepal S, Kypri K, Tekelab T, Hodder RK, Attia J, Bagade T, Chikritzhs T, Miller P. Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review [Internet]. *Journal of studies on alcohol and drugs*. 2020;81(1):5-23: <https://doi.org/10.15288/jsad.2020.81.5>
- 24 For an in depth examination of trading hours and harm see: New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: <https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf>.

- 25 See for example Waipā District Council draft LAP 2024 clause 3.1.8(f). See also Auckland District Licensing Committee. Off-licence Premises External Advertising Practice Note. 21 July 2023: <https://www.aucklandcouncil.govt.nz/licences-regulations/business-licences/alcohol-licences-fines/docsdlcpracticenotes/dlc-practice-note-external-signage.pdf>.
- 26 Chambers T, Stanley J, Signal L, et al. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol* 2018; 53: 626–33.
- 27 Alcohol Healthwatch. Alcohol advertising exposure near schools in Tāmaki Makaurau Auckland. July 2023: <https://www.ahw.org.nz/Portals/5/Resources/Fact%20Sheet/Alcohol-Advertising-Exposure-Near%20Schools%20in%20Tamaki%20Mak%20Auckland%20Updated%20new%20ISBN.pdf>
- 28 Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. *Health & Place* [Internet]. 2014;29:186-99: <https://doi.org/10.1016/j.healthplace.2014.07.002>.
- 29 Ministry of Health. Annual Update of Key Results 2020/21: New Zealand Health Survey. 2021; published online Dec 1: <https://minhealthnz.shinyapps.io/nz-health-survey-2020-21-annual-data-explorer>.
- 30 Sneyd, S., & Richardson, M. (2024). Online alcohol deliveries: age verification processes of online alcohol delivery companies in Auckland, New Zealand. *The New Zealand medical journal*, 137(1606), 13-21; 29 November 2024: <https://nzmj.org.nz/journal/vol-137-no-1606/online-alcohol-deliveries-age-verification-processes-of-online-alcohol-delivery-companies-in-auckland-new-zealand> and see : Sneyd, S. & Richardson, M. (2024). Alcohol Home Deliveries: age verification processes of online alcohol delivery companies in Auckland, New Zealand. Auckland, New Zealand: <https://www.ahw.org.nz/Portals/5/Resources/Documents-other/2024/Alcohol%20Home%20Deliveries%20HIGH%20DEF.pdf>.
- 31 See note 5 above. The societal cost of fetal alcohol spectrum disorder (FASD) has been calculated at \$4.8 billion annually. New Zealand Institute of Economic Research (NZIER). Cost of alcohol harms in New Zealand: Updating the evidence with recent research (2024): www.health.govt.nz/system/files/documents/publications/costs-of-alcohol-harms-in-new-zealand-2may24-v2.pdf.

Submitter – Health New Zealand

31 March 2025

Health New Zealand
Te Whatu Ora

Rotorua Lakes Council
Civic Centre
1061 Haupapa Street
ROTORUA

Tēnā koutou, Rotorua Lakes Council

TECHNICAL ADVICE: Draft Local Alcohol Policy

As required by the Sale and Supply of Alcohol Act (2012) the Health New Zealand National Public Health Service (NPHS) Te Manawa Taki Medical Officer of Health is providing advice on the Draft Local Alcohol Policy (LAP).

National Public Health Service Te Manawa Taki services Taranaki, Waikato, Bay of Plenty, Rotorua, Taupō and Tairāwhiti communities. Our National Public Health Service purpose is:

Manaakitia ngā whānau mō pae ora |

Enable whānau and communities to lead lives of wellness.

NPHS recognises its responsibilities to improve, promote and protect the health and wellbeing of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956 and other legislation. To achieve healthy communities and health equity across population groups, we work together across Health NZ and with other sectors to address the determinants of health.¹

Medical Officers of Health² have a responsibility to reduce conditions within their local community that are likely to cause injury and disease, including alcohol-related harm. The following advice to Council is provided in accordance with the responsibilities pursuant to the Sale and Supply of Alcohol Act 2012 (SaSA 2012) to ensure the safe and responsible sale, supply, and consumption of alcohol.

We welcome the opportunity to share public health advice and evidence in planning and decision-making with Rotorua Lakes Council. We wish to speak to our advice.

General Comments

The determinants of health

1. The determinants of health are the circumstances in the environments in which people are born, grow up, live, learn, work and age. These conditions can be described as environmental, economic, commercial and social.³ They have a significant influence on

¹ Determinants of health. (2017, February 3). World Health Organization.

² Section 7A, Health Act 1956

³ Public Health Advisory Committee. (2004). *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee.

[TeWhatuOra.govt.nz](https://www.tewhatuora.govt.nz)

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Te Kāwanatanga o Aotearoa
New Zealand Government

health outcomes.

2. Commercial determinants of health are private sector activities that influence health, directly or indirectly, positively or negatively.⁴ The alcohol industry is a commercial determinant of health because its actions contribute to a range of health and social impacts.⁵ Rotorua Lakes Council's LAP is an ideal opportunity to influence this commercial determinant of health through policy initiatives aimed at minimising alcohol-related harm in the community. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as Councils, Iwi/hapū/whānau, Pacific peoples, and Police if they are to achieve their greatest impact.

Alcohol-related harm

3. In the Rotorua district between 2018 and 2023, there was a significant increase in the population living in deprivation decile 10 areas, with the population gain in these areas surpassing the total population gain for the district.⁶ Notably, just over a quarter (i.e., 26%) of Rotorua's population resides in high deprivation areas.⁷
4. Nationally, high deprivation communities are at greater risk of adverse health outcomes, including alcohol-related harm. In addition, the density of off-licence outlets is three times higher in areas of high deprivation (94.6 per 100,000 people) compared to areas of low deprivation (31.0 per 100,000 people).⁸ Communities with a higher proportion of Māori also experience relatively higher off-licence density, with 74.5 alcohol outlets per 100,000 people, compared to 56.4 per 100,000 people in communities with a high proportion of non-Māori.⁸
5. A report by the New Zealand Institute of Economic Research (NZIER) for the Ministry of Health estimates that the total societal cost of alcohol-related harm in New Zealand is \$9.1 billion annually (\$4.8 billion of this is due to fetal alcohol spectrum disorder (FASD)).⁹ A healthier community is a more productive and prosperous one.
6. There is no safe level of alcohol consumption.¹⁰ A recent study evaluated and ranked drug harms using a multi-criteria decision analysis (MCDA) framework. The findings demonstrated alcohol causes more harm than any other drug in Aotearoa New Zealand.¹¹
7. In 2018 alone, alcohol caused an estimated 901 deaths (cancers contributed the greatest number of these deaths, at 376, followed by injuries, at 296), 1,250 cancers (13% [n=464]

⁴ World Health Organization (WHO) Fact Sheets on the Commercial Determinants of Health[Internet]. 2023 March 21. Available from <https://www.who.int/news-room/fact-sheets/detail/commercial-determinants-of-health>

⁵ de Lacy-Vawdon, C., & Livingstone, C. (2020). Defining the commercial determinants of health: a systematic review. *BMC Public Health*, 20, 1-16.

⁶ Health New Zealand | Te Whatu Ora. 2025. Alcohol Related Harm: Rotorua District. Wellington: Health New Zealand | Te Whatu Ora

⁷ University of Otago. n.d. Socioeconomic Deprivation Indexes: NZDep and NZiDep, Department of Public Health. <https://www.otago.ac.nz/wellington/research/groups/research-groups-in-the-department-of-public-health/hirp/socioeconomic-deprivation-indexes-nzdep-and-nzidep-department-of-public-health>

⁸ Chambers T, Mizdrak A, Herbert S, Davies A, Jones A. The estimated health impact of alcohol interventions in New Zealand: a modelling study. *Addiction*. 2023. <https://doi.org/10.1111/add.16331>

⁹ NZIER. 2024. Costs of alcohol harms in New Zealand: Updating the evidence with recent research. A report for the Ministry of Health. Available from [Costs of alcohol harms in New Zealand: Updating the evidence with recent research | Ministry of Health NZ](https://www.nzier.org.nz/research/costs-of-alcohol-harms-in-new-zealand)

¹⁰ World Health Organization. Europe. 2023. "No Level of Alcohol Consumption Is Safe for Our Health." <https://www.who.int/europe/news/item/04-01-2023-no-level-of-alcohol-consumption-is-safe-for-our-health>

¹¹ Crossin, R., Cleland, L., Wilkins, C., Rychert, M., Adamson, S., Potiki, T., Pomerleau, A.C., et al. 2023. "The New Zealand Drug Harms Ranking Study: A Multi-Criteria Decision Analysis." *Journal of Psychopharmacology* 37 (9): 891–903. <https://doi.org/10.1177/02698811231182012>.

of breast cancers and 12.6% [n=401] of colorectal cancers were attributed to alcohol), 29,282 hospitalisations (injuries accounted for 44% of these), 49,742 Disability Adjusted Life Years, and 128,963 Accident Compensation Corporation (ACC) claims.⁸

8. Alcohol-related harms are unevenly distributed by ethnicity in Aotearoa New Zealand. Māori are disproportionately affected, and twice as likely to die from alcohol-related causes compared with non-Māori.⁹ Locally, Māori account for a disproportionate number of alcohol-related presentations to Rotorua Hospital Emergency Department.⁶
9. Efforts to reduce alcohol-related harm in the Rotorua district, particularly among Māori communities, align with the Rotorua Lake Council's obligations under Article 3 of Te Tiriti o Waitangi. Implementing our recommendations will promote equitable health outcomes.
10. Alcohol use contributes to serious mental health problems. The World Health Organization (WHO) identifies alcohol as a major risk factor for suicide.¹² Research shows that over a quarter of people who die by suicide in Aotearoa New Zealand are acutely affected by alcohol at the time of their death.¹³ Aotearoa New Zealand also has one of the highest rates of suicide in the Organisation for Economic Co-operation and Development (OECD) for children aged 15-18 years of age (14.9 deaths per 100,000 adolescents, more than twice the average among 41 OECD countries).¹⁴

Global health viewpoint

11. The following policies recommended by the WHO are proven to reduce alcohol-related harm, and are relevant to Local Alcohol Policies:¹⁵
 - a. Raising the price of alcohol to make it less affordable.
 - b. Strengthen restriction on availability.
 - c. Limiting alcohol advertising and promotion.

Government viewpoint

12. The current Government has placed great importance on addressing the high levels of alcohol-related harm, evidenced by the fact that alcohol is one of the five modifiable risk factors prioritised in the Government Policy Statement on Health 2024 – 2027.¹⁶

Specific Comments

This section of our advice follows the structure of the Draft LAP and addresses Council's consultation questions.

On-Licences:

13. NPHS Te Manawa Taki supports the reduction in trading hours for on-licences within the

¹² World Health Organization. Preventing suicide: A global imperative. Geneva: World Health Organization, 2014.

¹³ Crossin R, Cleland L, Beautrais A, et al. Acute alcohol use and suicide deaths: An analysis of New Zealand coronial data from 2007–2020. *New Zealand Medical Journal* 2022;135(1558):65-78.

¹⁴ UNICEF. (2020, September). *New Report Card shows that New Zealand is failing its children*. Retrieved from UNICEF: <https://www.unicef.org/nz/stories/new-report-card-shows-that-new-zealand-is-failing-its-children>

¹⁵ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019.

¹⁶ Minister of Health. 2024. Government Policy Statement on Health 2024 – 2027. Wellington: Ministry of Health.

Inner City. However, we recommend the maximum trading hours to be 9:00am to 1:00am for both the Inner City and outside the Inner City. This will not only simplify the LAP, but also further reduce the potential for alcohol-related harm. Intoxicated people outside the Inner City will be less likely to migrate or drink drive to the Inner City to consume more alcohol. As indicated in a Health NZ Intelligence report, presentations involving alcohol to the Rotorua Hospital Emergency Department peak between 11:00pm and 3:00am.⁶ Earlier closing times for on-licence premises is supported by evidence that closing bars and pubs earlier leads to reduced alcohol-related physical harms including the incidence of assault and hospitalisation.^{17,18}

14. The current LAP has no restrictions for new on-licences in relation to sensitive facilities. We recommend no new on-licence applications (excluding cafes or restaurants) are granted if the premises are to be located within a 200m radius of any sensitive facility.
15. Also, we recommend any new on-licence premises are required to conduct a pre-application engagement with sensitive facilities within a 200m radius. NPHS Te Manawa Taki would like to work with Council to develop the pre-application engagement process and we suggest the new LAP to include this process as an appendix or link on RLC's website (i.e., template letter and meeting agenda). We recognise, evidence of pre-application engagement would ensure that the concerns of communities and sensitive facilities are considered in licensing decisions.

On-licence discretionary conditions:

16. We recommend a mandatory one-way door restriction is included for on-licence premises that operate as a pub, tavern or nightclub. One-way door restrictions are considered a policy tool to mitigate alcohol-related issues at late-night premises and reduce alcohol-related harm. These restrictions can potentially lessen the strain on police, ambulance, and hospital services, benefiting not only the patrons of these venues but also the wider community.¹⁹ A systematic review of eight studies published before June 2017 found that two studies reported a decline in assaults following the implementation of one-way door policies. One study showed reductions in assaults only within licenced premises, two studies indicated an increase in assaults, and three studies found no significant difference.²⁰

17. Our above recommendation is to include premises on 'Eat Street.'

Off-Licences:

18. NPHS Te Manawa Taki strongly supports the proposed stipulation that no new off-licences will be issued for 36 months from the date the new LAP is implemented. Furthermore, a strengthened approach would be implementing a permanent freeze in areas of deprivation

¹⁷ Connor J, MacLennan B, Huckle T et al. 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. *Addiction*. 2021 Apr;116(4):788-98.

¹⁸ Nepal S, Kypri K, Tekelab T, Hodder RK, Attia J, Bagade T, Chikritzhs T, Miller P. Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review [Internet]. *Journal of Studies on Alcohol and Drugs*. 2020;81(1):5-23. Available from: <https://doi.org/10.15288/jsad.2020.81.5>

¹⁹ Alcohol Healthwatch. (2024). A guide to inform Local Alcohol Policy development. Auckland. New Zealand: Alcohol Healthwatch.

²⁰ Nepal S, Kypri K, Pursey K, Attia J, Chikritzhs T, Miller P. Effectiveness of lockouts in reducing alcohol-related harm: systematic review [Internet]. *Drug and alcohol review*. 2018;37(4):527-36. Available from: <https://doi.org/10.1111/dar.12699>

7 to 10 (outside the Inner City) with the consideration of a sinking lid. As noted earlier, over a quarter of Rotorua's population lives in high deprivation areas.

19. We support the reduction of off-licence trading hours; however, we recommend a further reduction of 9:00am to 9:00pm. A robust LAP which limits trading hours is crucial to mitigate alcohol-related harm. Literature highlights that an increase in hazardous drinking occurs with longer trading hours and increased availability of alcohol.²¹
20. A recent modelling study, estimated that implementing stricter limits on off-licence trading hours (reduced to 50 hours per week) and density (reduced to 5 outlets per 100,000 people) could decrease overall alcohol consumption in Aotearoa New Zealand by 17.9%, resulting in a gain of 450,000 health-adjusted life years (HALYs) over the lifetime of the 2018 population.⁸ Limiting trading hours aligns with the WHO's recommendations of strengthening restrictions on alcohol availability mentioned earlier. In addition, there is local public support for off-licences operating from 9:00am to 9:00pm. We note that from Council's *Community Alcohol Survey*, 84% of respondents indicated they 'Never' purchase alcohol before 9:00am from off-licence premises. Furthermore, 63% of respondents purchase alcohol between 9:00am and 9:00pm.
21. We agree with Council's proposal to align delivery hours with off-licence trading hours to remove any loopholes. We support the courier warning and associated wording for the outside of the alcoholic delivery package.
22. We support Council's proposed definition of a sensitive facility to include places of worship, residential activity, youth centres, rehabilitation treatment facilities, community facility, educational facility, hospital, marae or urupā. NPHS Te Manawa Taki recommends a sensitive facility to include areas of cultural significance, health facilities, high deprivation areas (i.e., 7-10), and recreational facilities. Furthermore, we suggest amending the wording of 'hospitals' to 'health care facilities.' The recommendation of including a broader range of sensitive facilities, aims to protect the most underserved population groups within the Rotorua district.
23. After the 36-month freeze, we recommend that outside the Inner City to expand the current requirements of new off-licences by reference to proximity to sensitive facilities to 400m. This will ultimately have a significant effect on reducing alcohol-related harm within our communities. Specifically, areas such as Ngongotahā, Mamaku, Reporoa, and Kaingaroa Forest will not have any new off-licence outlets within the timeframe of this new policy.
24. A restriction of 400m for any new off-licence applications regarding proximity to sensitive facilities, compares to the distance of any specialist vape retailer (SVR) stores to schools or marae. An SVR store must be more than 300m from a school or marae.²²
25. A nationwide study by the University of Canterbury showed that proximity to alcohol outlets is associated with increased hazardous drinking and crime, including common assault and sexual assault.²³ This suggests that having off-licence outlets near schools could contribute to a more hazardous environment for students. Furthermore, this highlights the importance of Local Authorities implementing strong restrictions to protect young people

²¹ Casswell, S., Huckle, T., Wall, M., & Yeh, L.C. (2014). International alcohol control study: Pricing data and hours of purchase predict heavier drinking. *Alcoholism: Clinical and Experimental Research*, 38(5), 1425-1231.

²² Ministry of Health 2024. [Recent changes to Smokefree laws | Ministry of Health NZ](#)

²³ Hobbs, M., Marek, L., Wiki, J., Campbell, M., Deng, B. Y., Sharpe, H., McCarthy, J., & Kingham, S. (2020). Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand. *Health & Place*, 65, 102397.

and the wider community.

26. Our recommendation of 400m may be modest in relation to reducing alcohol-related harm in young people. For instance, a study conducted in Perth, Australia, involving 14-year-old students, revealed that the presence of a bottle store within 800m of their school was significantly linked to them having consumed alcohol at some point. Additionally, having a bottle store within 800m of either their home or school (or both) was associated with a higher likelihood of engaging in heavy drinking.²⁴
27. We agree with Council's proposal for all new off-licence applicants to conduct a pre-application engagement with sensitive facilities. As mentioned earlier, evidence of the engagement process will ensure that the concerns of communities and sensitive facilities are considered in licensing decisions.

Off-licence discretionary conditions:

28. NPHS Te Manawa Taki supports the inclusion of the mandatory condition of off-licensees to develop, display, and maintain a Social Responsibility Policy. As the draft LAP indicates such a policy should demonstrate the measures in place at the premises to minimise alcohol-related harm.
29. NPHS Te Manawa Taki supports including the condition for off-licence outlets to maintain an alcohol incident register or book. An incident register is a way to track the incidents on licenced premises and is a means to definitively assess alcohol-related harm.
30. NPHS Te Manawa Taki commends Council's mandatory condition of restricting the use of after pay services to procure alcohol from off-licences. There is evidence that buy now/pay later schemes (e.g. "Layby®" or "Afterpay®") are seen to promote impulse spending, therefore are not appropriate payment mechanisms for addictive or harmful products.²⁵
31. NPHS Te Manawa Taki strongly supports the proposal to ban alcohol advertising including promotions on the premises' exterior and signage so that no alcohol advertising is visible from outside the premises.
32. Children's exposure to alcohol marketing is a significant concern. Research from the University of Otago's Kids'Cam study, which used digital cameras, found that children aged 11-13 years were exposed to alcohol marketing an average of 4.5 times a day.²⁶ Furthermore, the Kids'Cam study revealed, tamariki Māori and Pacific children were exposed to alcohol advertising at rates of five and three times higher, respectively, compared to non-Māori and non-Pacific children.²⁶ Additional research has found there is a causal relationship between alcohol marketing and drinking among young people.²⁷ Young people's exposure to alcohol advertising is associated with earlier uptake of

²⁴ Trapp GS, Knuiman M, Hooper P, Foster S. Proximity to liquor stores and adolescent alcohol intake: A prospective study [Internet]. *American Journal of Preventive Medicine*. 2018;54(6):825-30. Available from: <https://www.sciencedirect.com/science/article/abs/pii/S074937971831599X>

²⁵ O'Brien L, Ramsay I, Ali P. Innovation, Disruption and Consumer Harm in the Buy Now Pay Later Industry: An Empirical Study. *University of New South Wales Law Journal*. 2024;47:2, 2024 (forthcoming), Retrieved from https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4635958

²⁶ Chambers T, Stanley J, Signal L, et al. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol* 2018; 53: 626–633.

²⁷ Sargent, J. D., & Babor, T. F. (2020). The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*, (s19), 113-124.

drinking and heavy drinking among adolescents who already drink.²⁸

33. Other vulnerable populations such as people recovering from alcohol dependence are also negatively impacted by alcohol advertising. Research indicates that heavy and problem drinkers are more responsive and therefore more vulnerable to alcohol advertising than others.²⁹ While there is limited research on other subgroups of adults vulnerable to alcohol marketing and its harms, the Royal Australian and New Zealand College of Psychiatrists³⁰ has noted other vulnerable adult groups may include:
- People suffering from mental health issues
 - Individuals with anger management issues
 - Adults with intellectual disabilities
 - People at risk of dementia and neuropsychiatric conditions
 - Women who may or may not know they are pregnant and are unaware of the risks of fetal alcohol spectrum disorders.
34. Again, NPHS Te Manawa Taki commends RLC's proposed mandatory condition of not allowing external alcohol advertising, signs or chattels. Limiting alcohol advertising and promotion is an important step towards reducing alcohol-related harm which is one of the WHO's proven policy recommendations.
35. NPHS Te Manawa Taki recommends adopting an additional discretionary condition regarding single sales. Specifically, included in recent District Licencing Committees (DLC) and or case law,³¹ we suggest including a no single sales condition on off-licenced premises.
36. We recommend no drinking games to be sold at off-licenced premises, specifically bottle stores.
37. An additional recommendation we have is to include FASD warning signage within the single sale alcohol area in supermarkets and grocery stores, and at the point of sale at bottle stores. As previously stated, the annual societal cost of FASD is \$4.8 billion in Aotearoa New Zealand.⁹

Club Licences:

38. NPHS Te Manawa Taki recommends shortening the opening hours for club licences to 9.00am. As mentioned earlier, longer trading hours is associated with an increase in hazardous drinking.

Club licence discretionary conditions:

39. NPHS Te Manawa Taki recommends RLC to consider adopting additional discretionary conditions similar to which are included in Tauranga City Council's (TCC) LAP.³² These conditions are considered to help promote more responsible alcohol consumption.

²⁸ Brown K. Association Between Alcohol Sports Sponsorship and Consumption: A Systematic Review. *Alcohol Oxf* 2016; 51: 747–55.

²⁹ Babor T, Robaina K, Noel J, Ritson E. Vulnerability to alcohol-related problems: a policy brief with implications for the regulation of alcohol marketing. *Addiction* 2017; 112: 94–101.

³⁰ Alcohol Healthwatch 2021: Alcohol Marketing: Retrieved from: Factsheet - Alcohol Marketing Feb 2021_1.pdf

³¹ Communities Against Alcohol Harm (2024). Improving Practice for Single Sales including High Strength Low-Cost Beer

³² Tauranga City Council 2024 [Local Alcohol Policy](#)

Special Licences:

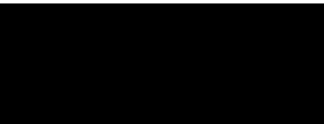
Special licence discretionary conditions

40. In addition to the current discretionary conditions for special licences, again, we recommend RLC incorporates similar conditions which are included in TCC's LAP.³² Alcohol-related harm will reduce with the inclusion of these conditions for special licenced events.
41. Furthermore, we recommend prohibiting licences for events focused on children and young people under 18 years of age to limit their exposure to alcohol. There is evidence to suggest the negative impacts of children witnessing a parent or primary carer consume alcohol. A 2014 study found that the 'European approach' to drinking increases young people's likelihood to drink hazardously at an earlier age.³³ Another study from 2017 found that children who had witnessed their parents tipsy or drunk were less likely to perceive their parent as a positive role model. Moreover, children were more likely to report a parent being more unpredictable and more argumentative than usual.³⁴

Conclusion

42. In conclusion, the new Draft LAP proposed by the Rotorua Lakes Council represents a significant step towards reducing the relatively high levels of alcohol-related harm and promoting public health in the community. We urge the Council to consider our evidence-based advice, our recommendations in response to the consultation questions, and to rigorously enforce the LAP provisions. By doing so, we can create a safer, healthier, and more vibrant Rotorua for all residents and visitors.

Nāku iti nei, nā,



Dr Lynne Lane

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National Public Health Service Te Manawa Taki

³³ Kaynak, Ö., Winters, C., Cacciola, J., Kirby, C., & Arria, M. (2014). Providing alcohol for underage youth: what messages should we be sending parents? *Journal of Studies on Alcohol and Drugs*, 75(4), 590-605.

³⁴ Institute of Alcohol Studies, (2017). Like sugar for adults: The effect of non-dependent parental drinking on children and families. <http://www.ias.org.uk/uploads/pdf/IAS%20reports/rp28102017.pdf>

Submitter – Reg Hennessy (Hennessy’s Irish bar)

TO ROTORUA LAKES COUNCIL

SUBMISSION ON

LOCAL ALCOHOL POLICY 2025

27/03/2025

Reg Hennessy
Hennessy’s Irish Bar
Branch President Hospitality NZ BOP
Email [REDACTED]
Phone [REDACTED]

My full name, Reginald Joseph Hennessy.

Introduction:

I have owned and operated bars in Rotorua CBD since 1993 – and I have owned and operated Hennessy's Irish Bar since 2002.

I have been President of the BOP Branch of Hospitality New Zealand (HNZ) since 2003, and I have also served on the National Board of HNZ for five years, three of those as National Vice President.

Background

During this time from 1993 I have witnessed huge change in both our CBD and the number of Liquor Licences granted. When Eat Street was first considered, I was 100% supportive as I saw a definite need for a well-run dining precinct in Rotorua, as we witness in most larger tourist destinations around the world. When asked if I had any reservations about the development, I did not but stressed to the then Council and Licencing Regulators who chose to listen the need for the venues in this new area to operate under Restaurant Licences and not Bar or Tavern Licences. I still believe if this was the case and there weren't taverns and night clubs in "Eat Street" we would have less issues, a family-friendly and safe for tourist dining area.

Local Alcohol Policy 2025

I welcome the opportunity to be able to comment on this and would be available to present to Council at a time which suits you.

Off-Licences.

As my only operation is now an on-licence business, I chose not to comment on proposals for off-licences, other than to say one of the major problems I see for our industry going forward is the continually widening

gap between the cost to purchase a beer from an off-licence compared to having a pint in a safe, well-controlled environment in an on-licence. As pricing is outside the powers of Council, I say this as a point of interest and consideration.

Question 5:

I strongly **disagree** with Option 2 bringing forward maximum closing hours from 3 am to 2 am in the CBD. I have operated Hennessy's Irish Bar for 23 years in Rotorua's CBD with a 3 am licence. In this time, we have had no major problems at all. While of course hosting some of Rotorua's largest ever events – Lion's Tours 2005/2017 & Rugby World Cup 2011; we've also hosted many after conference events such as Fonterra's (a huge event) and Dancing with the Stars after event to name but two. None of these events ever had any issues and I am talking about thousands, not hundreds of people attending. We do not treat our right to hold a 3 am licence lightly and we carefully choose when we use it, for both the well-being of the bar and our community.

If Council feels there are issues with some establishment's 3 am licence, then I strongly suggest they should deal with those establishments, not blanket the whole industry with this retrograde step. Each applicant should be judged on its merit and past history and new licence applications could have a trial period to prove their suitability.

If Rotorua wants to distance itself from New Zealand's number one tourist destination Queenstown, then carry on making our hospitality industry a 'sleeping stay-over' destination. Tourists expect later night trading, particularly our international visitors.

I strongly disagree that 3am licences in our city cause fights, vandalism and disorder. Please show us the data that supports this. To list as a negative from the status quo option "high levels of harm" is incorrect and not supported by disclosed data or evidence. It's like saying people are killed in cars, so let's get rid of all Toyotas.

Hennessy's used to operate on a 6 am to 3am licence, and for no apparent reason our 6 am opening was moved to 8 am the last time we had a review of the LAP. The only thing this has achieved for my business was to lose the ability to trade without applying for a Special Licence. Is this process going to keep chipping away at our trading hours for no real reason until we get to the old 11pm closing time: Good night Kiwi.

I obviously strongly support Option 1, the status quo.

Question 6:

I support the Council's preferred option, option 1 status quo. Concerns I have with Option 2: I disagree with the inclusion of "residential activity" to the list of sensitive sites; the Public can oppose a license through the public objection process. As a commercial or industrial area is resource consented to have these types of businesses this should be considered when council approved that consent. If residential boundaries come in contact with the commercial area they will be within the 200m.

Question 9: Special Licences

Special Licence application can prove very costly and very time consuming for businesses. I have witnessed firsthand how pedantic different regulators can be at times, and more often than not unnecessarily so. I do not support Option 2, that is the addition of more discretionary conditions which could increase the costs and workload and administration to achieve compliance.

I have commented on listed special discretionary conditions below:

- a. Noise Management Plan: I guess if we looking into the future and Rotorua is going to have a lot more accommodation in the CBD, maybe the burden of sound proofing should be put back onto accommodation providers and developers. As bars and taverns we need to be very mindful of our neighbours at all times.

- b. Restrictions on 'Shot' sizes: I don't really understand – shots should only ever be **30 ml**. Good host responsibility takes care of the rest.
- c. Queue Management: I 100% agree with the need for queue management plan. This is a situation which can easily get out of hand.
- d. Happy Hour restrictions: I believe there are far too many happy 'hours' in Rotorua. When you have happy hours going seven days a week for three or four hour periods; Gin, Beer & Wine happy hours, every establishment in Eat Street appears to run daily happy hours, small cafes running daily three hour happy hours with alcohol but not on their coffees or food – yes, I do think it has got out of control and needs reigning in. Cheap pricing encourages more consumption, and time restrictions encourage faster drinking and excessive consumption - all against the object of the Act.
- e. One-way Door Strategy/Policy: I'm strongly against a one-way door policy. Never been proven to work – whether it's problems caused by groups of people moving about late at night, migrating to venues, from venues, queuing, putting unnecessary stress on businesses, transport and police, putting people off even going out which is something we definitely don't need after years of 'doing it tough.'
- f. CCTV: Costs could be prohibitive and send businesses to the wall trying to purchase cameras and recording equipment of a standard to meet compliance requirements.
- g. Patron to security (person) ratio: How could anyone work this out. Would the ratio devised also apply to council run events such as the recently held Lake Concert or other large events where alcohol is involved, such as Sports Events.

- h. Duty Manager to Patron ratio: How on earth could this practically work when businesses such as ours going from 50 people to 150 people within an hour, when not expected. Who would be included in the head count – children dining with their parents??
- i. Outdoor Seating: Restrictions on outdoor seating – I guess the question to this condition is why when the world is using outdoor dining more would Rotorua start to close it down. That would not be innovative or forward thinking.

Conclusion

I would personally like to thank Rotorua Lakes Council for the opportunity to provide input into this consultation process.

I would be happy to discuss any parts of my submission in more detail and to provide any assistance that may be required.

I am acutely aware of the cost of this review. In the current financial situation options should be considered, as the Wellington Council decision to spare the cost and retain their policy shows real commonsense and leadership for both their Hospitality Sector and rate payers.

My strong opinion is that LAP must stay within the Sale & Supply of Alcohol Act (2012), and it would be a real saving for Council if these reviews were undertaken at a national level.

Submitter – Rajesh Dahiya



Respondent No: 20
Login: Anonymous
Email: n/a

Responded At: Mar 10, 2025 14:21:17 pm
Last Seen: Mar 10, 2025 14:21:17 pm
IP Address: n/a

Q1. I would like to:

Answer the questions online

Q2. E whakaae ana rānei koe ki te whiringa e

Disagree

hiahiatia ana e te Kaunihera (Whiringa 2): Kia 3 tau te roa o te aukatinga taupuatanga o te tukunga o ngā raihana toa hoko waipiro me te pōhēhē hoki ka whakaaetia ētehi atu raihana toa hoko waipiro ā muri ake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): a temporary freeze on issuing any new off-licences* for 3 years and a presumption against issuing any new off-licences thereafter**? If you disagree, please indicate your preferred option.*Off-licence: allows sale and supply of alcohol for consumption elsewhere, e.g. bottle store, supermarket **No new off-licences issued for 3 years and after 3 years it will be difficult to be issued a new off-licence View the question on page 9 on the Statement of Proposal - (PDF, 1.2MB)

Q3. Do you have any additional comments?

not answered

Q4. Do you have any additional comments?

This is an extended halt that could act as a barrier to economic growth and reduce market competition, potentially leading to higher prices.

Q5. E whakaae ana rānei koe ki te whiringa e

Disagree

hiahiatia ana e te Kaunihera (Whiringa 2): Kia wawe ake te katinga o ngā toa hoko waipiro i te 7 karaka i te ata ki te 9 karaka i te pō? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): Earlier closing times for off-licences making trading hours 7am to 9pm? If you disagree, please indicate your preferred option. View the question on page 10 on the Statement of Proposal - (PDF, 1.2MB)

Q6. Do you have any additional comments?

not answered

Q7. Do you have any additional comments?

Rotorua is a popular holiday destination, attracting visitors for leisure and recreation. Restricting trading hours would shorten the window to cater to travellers, potentially leading to a decline in revenue and dissatisfaction among visitors.

Q8. E whakaae ana rānei koe ki te tono a te Kaunihera kia rite ngā hāora rato ki ngā hāora tuwhera o ngā toa hoko waipiro? Ki te whakahē koe, tēnā whakamāramahia mai. Do you agree or disagree with the Council's proposal to align delivery hours with off-licence opening hours? If you disagree please provide your reasoning. [View the question on page 11 on the Statement of Proposal - \(PDF, 1.2MB\)](#)

Agree

Q9. Do you have any additional comments?

This has to match.

Q10. Do you have any additional comments?

not answered

Q11. E whakaae ana rānei koe ki te whiringa e hiahia ana e te Kaunihera (Whiringa 2): kia mau tonu ngā whakatairanga herenga here kore me ētehi atu herenga here kore ka āpitihia? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): The current discretionary conditions be retained and further additional discretionary conditions be added? If you disagree, please indicate your preferred option. [View the question on page 12 on the Statement of Proposal - \(PDF, 1.2MB\)](#)

Disagree

Q12. Do you have any additional comments?

not answered

Q13. Do you have any additional comments?

I disagree with adding further discretionary conditions, as additional restrictions could create unnecessary operational challenges for businesses. Instead, I support maintaining the current conditions, ensuring a balanced approach that promotes responsible alcohol management without imposing excessive limitations on businesses.

Q14. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): kia whakaitia ngā hāora o te raihana rato waipiro i ngā pāpara kāuta me ngā wharekai o te tāone ki te rua karaka i te ata. Kia katia tonuhia ngā pāpara kāuta me ngā wharekai i waho i te tāone i te tahi karaka i te ata? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): on-licence* closing hours within the Inner City be reduced to a maximum of 2am. On-licence* closing hours for premises outside the Inner City will remain 1am? If you disagree, please indicate your preferred option.* On-licence: allows sale and supply of alcohol for consumption on site, e.g. pub, restaurant View the question on page 14 on the Statement of Proposal - (PDF, 1.2MB)

Disagree

Q15. Do you have any additional comments?

not answered

Q16. Do you have any additional comments?

I disagree with the proposed reduction in on-licence closing hours within the Inner City to 2 AM. Rotorua is a key tourism and hospitality destination, and limiting operating hours could negatively impact the local economy by reducing revenue for bars, restaurants, and entertainment venues. Shorter trading hours may also discourage visitors, affecting the city's appeal as a vibrant nightlife destination. This could lead to decreased foot traffic, job losses in the hospitality sector, and a decline in overall tourism-related spending. A more flexible approach would better support both responsible alcohol management and economic sustainability.

Q17. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuīnga, karekau he herenga kia tū tētehi hui tono wawe e whiwhi ai i tētehi raihana pāpara kāuta e whai pānga ana ki ngā ratonga me whai tūtehi? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, there are no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities? If you disagree, please indicate your preferred option. View the question on page 15 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q18. Do you have any additional comments?

I agree with maintaining the status quo, as introducing restrictions or additional pre-application engagement requirements could create unnecessary barriers for businesses. Rotorua's hospitality sector plays a crucial role in the local economy, and adding more regulatory hurdles may discourage new investments and limit business growth. A well-managed licensing process, combined with responsible service practices, is sufficient to ensure that community interests are balanced without imposing excessive restrictions on businesses.

Q19. Do you have any additional comments?

not answered

Q20. E whakaae ana rānei koe ki te whiringa e Agree

hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana pāpara kāuta? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for on-licences? If you disagree, please indicate your preferred option. View the question on page 16 on the Statement of Proposal - (PDF, 1.2MB)

Q21. Do you have any additional comments?

I agree with maintaining the status quo and keeping the current discretionary conditions for on-licences. The existing conditions provide a balanced approach, ensuring responsible alcohol management while allowing businesses to operate effectively. Introducing additional restrictions could create operational challenges, reduce revenue, and negatively impact Rotorua's hospitality and tourism sector. A well-regulated but business-friendly approach is essential for sustaining economic growth and maintaining the city's appeal as a vibrant destination.

Q22. Do you have any additional comments?

not answered

Q23. E whakaae ana rānei koe ki te whiringa e Agree

hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana-karapu? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for club-licences? If you disagree, please indicate your preferred option. View the question on page 18 on the Statement of Proposal - (PDF, 1.2MB)

Q24. Do you have any additional comments?

I agree with maintaining the status quo and keeping the current discretionary conditions for club licences. The existing conditions provide a fair balance between responsible alcohol management and the operational needs of clubs. Additional restrictions could place unnecessary burdens on community clubs, affecting their ability to generate revenue and provide social and recreational opportunities. Keeping the current approach ensures clubs can continue to thrive while maintaining responsible service practices.

Q25. Do you have any additional comments?

not answered

Q26. E whakaae ana rānei koe ki te whiringa e Agree

hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana motuhake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a kō. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for special-licences? If you disagree, please indicate your preferred option. View the question on page 20 on the Statement of Proposal - (PDF, 1.2MB)

Q27. Do you have any additional comments?

I agree with maintaining the status quo and keeping the current discretionary conditions for special licences. The existing framework provides a balanced approach, allowing events and gatherings to operate smoothly while ensuring responsible alcohol management. Introducing additional restrictions could create unnecessary hurdles for event organizers, potentially reducing the number of events held in Rotorua. This could lead to a decline in tourism and local business revenue, impacting the city's reputation as a vibrant event destination.

Q28. Do you have any additional comments?

not answered

Q29. He kupu kōrero atu anō āu? Do you have any other feedback?

I encourage the Council to take a balanced approach that supports both responsible alcohol management and economic growth. Rotorua is a key tourism and hospitality destination, and excessive restrictions on alcohol licensing and trading hours could negatively impact businesses, reduce visitor satisfaction, and lead to revenue loss. I recommend ongoing collaboration with local businesses, hospitality stakeholders, and the community to ensure policies are practical, fair, and beneficial for all. Instead of broad restrictions, targeted initiatives—such as improved enforcement of existing regulations and responsible service training—could achieve better outcomes without stifling economic activity.

Q30. Tukuatu he puka wea ki konei Upload a submission here not answered

Q31. Tuhia mai he tāpaetanga e pā ana ki tētahi o ngā kaupapa, otirā ki ngā kaupapa katoa Write a submission about any/all of the topics.

not answered

Q32. Tō IngoaName	Rajesh Dahiya
Q33. Tō ĪmēraEmail address	[REDACTED]
Q34. Kei te pirangi koe ki te tū i mua i te marea ki te kōrero ki te Kaunihera?Do you wish to present your submission publicly in front of elected members at a hearing? What to expect at a hearing - (PDF, 40KB)	Yes
Q35. Tō WāeaContact number	[REDACTED]
Q36. When would you prefer to present at a hearing?	Morning
Q37. I whakaae ahau ki te karangatanga mahi me te kaupapa here noho matatapu o te ratonga karangatanga Engagement HQ I agree to the Terms of Use and Privacy Policy for using Engagement HQ	I agree

Submitter – Mem Jenner



Respondent No: 38

Login: Anonymous

Email: n/a

Responded At: Mar 13, 2025 13:10:28 pm

Last Seen: Mar 13, 2025 13:10:28 pm

IP Address: n/a

Q1. I would like to:

Answer the questions online

Q2. E whakaae ana rānei koe ki te whiringa e hiahiaia ana e te Kaunihera (Whiringa 2): Kia 3 tau te roa o te aukatinga taupuatanga o te tukunga o ngā raihana toa hoko waipiro me te pōhēhē hoki ka whakaaetia ētehi atu raihana toa hoko waipiro ā muri ake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): a temporary freeze on issuing any new off-licences* for 3 years and a presumption against issuing any new off-licences thereafter**? If you disagree, please indicate your preferred option. *Off-licence: allows sale and supply of alcohol for consumption elsewhere, e.g. bottle store, supermarket **No new off-licences issued for 3 years and after 3 years it will be difficult to be issued a new off-licence View the question on page 9 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q3. Do you have any additional comments?

What happens after the 3 years because there will be a huge backlog wanting to open up. Maybe through the freeze identifying areas where there is a high number of off-licences in and around the area to make the freeze sustainable in high need areas.

Q4. Do you have any additional comments?

not answered

Q5. E whakaae ana rānei koe ki te whiringa e hiahiaia ana e te Kaunihera (Whiringa 2): Kia wawe ake te katinga o ngā toa hoko waipiro i te 7 karaka i te ata ki te 9 karaka i te pō? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): Earlier closing times for off-licences making trading hours 7am to 9pm? If you disagree, please indicate your preferred option. View the question on page 10 on the Statement of Proposal - (PDF, 1.2MB)

Disagree

Q6. Do you have any additional comments?

not answered

Q7. Do you have any additional comments?

I prefer Option 3: 9am to 9pm. Less hours means greater ability to control alcohol related harm especially for vulnerable people wanting alcohol at 7am.

Q8. E whakaae ana rānei koe ki te tono a te Disagree

Kaunihera kia rite ngā hāora rato ki ngā hāora tuwhera o ngā toa hoko waipiro? Ki te whakahē koe, tēnā whakamāramahia mai. Do you agree or disagree with the Council's proposal to align delivery hours with off-licence opening hours? If you disagree please provide your reasoning. View the question on page 11 on the Statement of Proposal - (PDF, 1.2MB)

Q9. Do you have any additional comments?

not answered

Q10. Do you have any additional comments?

Same answer as above.

Q11. E whakaae ana rānei koe ki te whiringa e Agree

hiahia ana e te Kaunihera (Whiringa 2): kia mau tonu ngā whakatairanga herenga here kore me ētehi atu herenga here kore ka āpitihia? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): The current discretionary conditions be retained and further additional discretionary conditions be added? If you disagree, please indicate your preferred option. View the question on page 12 on the Statement of Proposal - (PDF, 1.2MB)

Q12. Do you have any additional comments?

not answered

Q13. Do you have any additional comments?

not answered

Q14. E whakaae ana rānei koe ki te whiringa e hiahiaitia ana e te Kaunihera (Whiringa 2): kia whakaitia ngā hāora o te raihana rato waipiro i ngā pāpara kāuta me ngā wharekai o te tāone ki te rua karaka i te ata. Kia katia tonuhia ngā pāpara kāuta me ngā wharekai i waho i te tāone i te tahi karaka i te ata? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): on-licence* closing hours within the Inner City be reduced to a maximum of 2am. On-licence* closing hours for premises outside the Inner City will remain 1am? If you disagree, please indicate your preferred option.* On-licence: allows sale and supply of alcohol for consumption on site, e.g. pub, restaurant View the question on page 14 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q15. Do you have any additional comments?

not answered

Q16. Do you have any additional comments?

not answered

Q17. E whakaae ana rānei koe ki te whiringa e hiahiaitia ana e te Kaunihera (Whiringa 1): E ai ki te nuīnga, karekau he herenga kia tū tētehi hui tonu wawe e whiwhi ai i tētehi raihana pāpara kāuta e whai pānga ana ki ngā ratonga me whai tūtehi? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, there are no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities? If you disagree, please indicate your preferred option. View the question on page 15 on the Statement of Proposal - (PDF, 1.2MB)

Disagree

Q18. Do you have any additional comments?

not answered

Q19. Do you have any additional comments?

Option 2 offers more advantages and less disadvantages in relation to alcohol harm.

Q20. E whakaae ana rānei koe ki te whiringa e Disagree

hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana pāpara kāuta? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for on-licences? If you disagree, please indicate your preferred option. View the question on page 16 on the Statement of Proposal - (PDF, 1.2MB)

Q21. Do you have any additional comments?

not answered

Q22. Do you have any additional comments?

Option 2 specifies Mandatory Provisions and considers discretionary conditions making owners more compliant.

Q23. E whakaae ana rānei koe ki te whiringa e Disagree

hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana-karapu? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for club-licences? If you disagree, please indicate your preferred option. View the question on page 18 on the Statement of Proposal - (PDF, 1.2MB)

Q24. Do you have any additional comments?

not answered

Q25. Do you have any additional comments?

Option 2 same discretionary conditions providing patrons a safer venue. Minimising alcohol related harm.

Q26. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana motuhake? Ki te whakahē koe, tēnā whakamōhihia mai te whiringa pai ake ki a koDo you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for special-licences? If you disagree, please indicate your preferred option.View the question on page 20 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q27. Do you have any additional comments?

Option 2 offers a safer environment that only proves to make the over more accountable whilst thinking of the patrons whom are being taken care of.

Q28. Do you have any additional comments?

not answered

Q29. He kupu kōrero atu anō āu?Do you have any other feedback?

I believe this is one of the best LAPs that will ensure our people are looked after in terms of business and patronage. You have done an excellent job with the consideration to minimize alcohol-related harm.

Q30. Tukuatu he puka wea ki koneiUpload a submission here

not answered

Q31. Tuhia mai he tāpaetanga e pā ana ki tētahi o ngā kaupapa, otirā ki ngā kaupapa katoaWrite a submission about any/all of the topics.

not answered

Q32. Tō IngoaName

Mem Jenner

Q33. Tō ĪmēraEmail address

[REDACTED]

Q34. Kei te pīrangī koe ki te tū i mua i te marea ki te kōrero ki te Kaunihera?Do you wish to present your submission publicly in front of elected members at a hearing? What to expect at a hearing - (PDF, 40KB)

Yes

Q35. Tō WāeaContact number

[REDACTED]

Q36. When would you prefer to present at a hearing?

Morning

Submitter – Jaiju Devassy



Respondent No: 60

Login: Anonymous

Email: n/a

Responded At: Mar 17, 2025 16:17:32 pm

Last Seen: Mar 17, 2025 16:17:32 pm

IP Address: n/a

Q1. I would like to:

Answer the questions online

Q2. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia 3 tau te roa o te aukatinga taupuatanga o te tukunga o ngā raihana toa hoko waipiro me te pōhēhē hoki ka whakaaetia ētehi atu raihana toa hoko waipiro ā muri ake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): a temporary freeze on issuing any new off-licences* for 3 years and a presumption against issuing any new off-licences thereafter**? If you disagree, please indicate your preferred option.*Off-licence: allows sale and supply of alcohol for consumption elsewhere, e.g. bottle store, supermarket **No new off-licences issued for 3 years and after 3 years it will be difficult to be issued a new off-licence View the question on page 9 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q3. Do you have any additional comments?

not answered

Q4. Do you have any additional comments?

not answered

Q5. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia wawe ake te katinga o ngā toa hoko waipiro i te 7 karaka i te ata ki te 9 karaka i te pō? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): Earlier closing times for off-licences making trading hours 7am to 9pm? If you disagree, please indicate your preferred option. View the question on page 10 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q6. Do you have any additional comments?

not answered

Q7. Do you have any additional comments?

not answered

Q8. E whakaae ana rānei koe ki te tono a te Kaunihera kia rite ngā hāora rato ki ngā hāora tuwhera o ngā toa hoko waipiro? Ki te whakahē koe, tēnā whakamāramahia mai. Do you agree or disagree with the Council's proposal to align delivery hours with off-licence opening hours? If you disagree please provide your reasoning. View the question on page 11 on the Statement of Proposal - (PDF, 1.2MB) Agree

Kaunihera kia rite ngā hāora rato ki ngā hāora tuwhera o ngā toa hoko waipiro? Ki te whakahē koe, tēnā whakamāramahia mai. Do you agree or disagree with the Council's proposal to align delivery hours with off-licence opening hours? If you disagree please provide your reasoning. View the question on page 11 on the Statement of Proposal - (PDF, 1.2MB)

Q9. Do you have any additional comments?

not answered

Q10. Do you have any additional comments?

not answered

Q11. E whakaae ana rānei koe ki te whiringa e hiahia ana e te Kaunihera (Whiringa 2): kia mau tonu ngā whakatairanga herenga here kore me ētehi atu herenga here kore ka āpitihia? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): The current discretionary conditions be retained and further additional discretionary conditions be added? If you disagree, please indicate your preferred option. View the question on page 12 on the Statement of Proposal - (PDF, 1.2MB) Agree

E whakaae ana rānei koe ki te whiringa e hiahia ana e te Kaunihera (Whiringa 2): kia mau tonu ngā whakatairanga herenga here kore me ētehi atu herenga here kore ka āpitihia? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): The current discretionary conditions be retained and further additional discretionary conditions be added? If you disagree, please indicate your preferred option. View the question on page 12 on the Statement of Proposal - (PDF, 1.2MB)

Q12. Do you have any additional comments?

not answered

Q13. Do you have any additional comments?

not answered

Q14. E whakaae ana rānei koe ki te whiringa e hiahiaitia ana e te Kaunihera (Whiringa 2): kia whakaitia ngā hāora o te raihana rato waipiro i ngā pāpara kāuta me ngā wharekai o te tāone ki te rua karaka i te ata. Kia katia tonuhia ngā pāpara kāuta me ngā wharekai i waho i te tāone i te tahi karaka i te ata? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): on-licence* closing hours within the Inner City be reduced to a maximum of 2am. On-licence* closing hours for premises outside the Inner City will remain 1am? If you disagree, please indicate your preferred option.* On-licence: allows sale and supply of alcohol for consumption on site, e.g. pub, restaurant View the question on page 14 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q15. Do you have any additional comments?

not answered

Q16. Do you have any additional comments?

not answered

Q17. E whakaae ana rānei koe ki te whiringa e hiahiaitia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, karekau he herenga kia tū tētehi hui tono wawe e whiwhi ai i tētehi raihana pāpara kāuta e whai pānga ana ki ngā ratonga me whai tūtehi? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, there are no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities? If you disagree, please indicate your preferred option. View the question on page 15 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q18. Do you have any additional comments?

not answered

Q19. Do you have any additional comments?

not answered

Q20. E whakaae ana rānei koe ki te whiringa e hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuīnga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana pāpara kāuta? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for on-licences? If you disagree, please indicate your preferred option. View the question on page 16 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q21. Do you have any additional comments?

not answered

Q22. Do you have any additional comments?

not answered

Q23. E whakaae ana rānei koe ki te whiringa e hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuīnga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana-karapu? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for club-licences? If you disagree, please indicate your preferred option. View the question on page 18 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q24. Do you have any additional comments?

not answered

Q25. Do you have any additional comments?

not answered

<p>Q26. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana motuhake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koDo you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for special-licences? If you disagree, please indicate your preferred option.View the question on page 20 on the Statement of Proposal - (PDF, 1.2MB)</p>	<p>Agree</p>
<p>Q27. Do you have any additional comments?</p>	<p>not answered</p>
<p>Q28. Do you have any additional comments?</p>	<p>not answered</p>
<p>Q29. He kupu kōrero atu anō āu?Do you have any other feedback?</p>	<p>not answered</p>
<p>Q30. Tukuatu he puka wea ki koneiUpload a submission here</p>	<p>not answered</p>
<p>Q31. Tuhia mai he tāpaetanga e pā ana ki tētahi o ngā kaupapa, otirā ki ngā kaupapa katoaWrite a submission about any/all of the topics.</p>	<p>not answered</p>
<p>Q32. Tō IngoaName</p>	<p>Jaiju devassy</p>
<p>Q33. Tō ImēraEmail address</p>	<p>[REDACTED]</p>
<p>Q34. Kei te pirangi koe ki te tū i mua i te marea ki te kōrero ki te Kaunihera?Do you wish to present your submission publicly in front of elected members at a hearing? What to expect at a hearing - (PDF, 40KB)</p>	<p>Yes</p>
<p>Q35. Tō WāeaContact number</p>	<p>[REDACTED]</p>
<p>Q36. When would you prefer to present at a hearing?</p>	<p>Morning</p>
<p>Q37. I whakaae ahau ki te karangatanga mahi me te kaupapa here noho matatapu o te ratonga karangatanga Engagement HQ I agree to the Terms of Use and Privacy Policy for using Engagement HQ</p>	<p>I agree</p>

Submitter – Karen Hunt



Respondent No: 80

Login: Anonymous

Email: n/a

Responded At: Mar 21, 2025 11:55:49 am

Last Seen: Mar 21, 2025 11:55:49 am

IP Address: n/a

Q1. I would like to:

Answer the questions online

Q2. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia 3 tau te roa o te aukatinga taupuatanga o te tukunga o ngā raihana toa hoko waipiro me te pōhēhē hoki ka whakaaetia ētehi atu raihana toa hoko waipiro ā muri ake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): a temporary freeze on issuing any new off-licences* for 3 years and a presumption against issuing any new off-licences thereafter***? If you disagree, please indicate your preferred option. *Off-licence: allows sale and supply of alcohol for consumption elsewhere, e.g. bottle store, supermarket **No new off-licences issued for 3 years and after 3 years it will be difficult to be issued a new off-licence View the question on page 9 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q3. Do you have any additional comments?

The temporary freeze for three years sends a clear signal to the community that the Council are aware of the impacts of availability on alcohol related harm and we Rotorua is well served already with a number of off licensed premises.

Q4. Do you have any additional comments?

not answered

Q5. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia wawe ake te katinga o ngā toa hoko waipiro i te 7 karaka i te ata ki te 9 karaka i te pō? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): Earlier closing times for off-licences making trading hours 7am to 9pm? If you disagree, please indicate your preferred option. View the question on page 10 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q6. Do you have any additional comments?

An earlier closing time of 9pm is in line with the Auckland Council LAP which was contested at the Supreme Court. Aligning closing times with the biggest population density in Auckland should be regarded as following best practice.

Q7. Do you have any additional comments?

not answered

Q8. E whakaae ana rānei koe ki te tono a te **Agree**

Kaunihera kia rite ngā hāora rato ki ngā hāora tuwhera o ngā toa hoko waipiro? Ki te whakahē koe, tēnā whakamāramahia mai. Do you agree or disagree with the Council's proposal to align delivery hours with off-licence opening hours? If you disagree please provide your reasoning. View the question on page 11 on the Statement of Proposal - (PDF, 1.2MB)

Q9. Do you have any additional comments?

not answered

Q10. Do you have any additional comments?

not answered

Q11. E whakaae ana rānei koe ki te whiringa e **Agree**

hiahia ana e te Kaunihera (Whiringa 2): kia mau tonu ngā whakatairanga herenga here kore me ētehi atu herenga here kore ka āpitihia? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): The current discretionary conditions be retained and further additional discretionary conditions be added? If you disagree, please indicate your preferred option. View the question on page 12 on the Statement of Proposal - (PDF, 1.2MB)

Q12. Do you have any additional comments?

Discretionary conditions are an important tool for the DLC in their decision making. Additional discretionary conditions will provide further safeguards and oversight.

Q13. Do you have any additional comments?

not answered

Q14. E whakaae ana rānei koe ki te whiringa e hiahiaia ana e te Kaunihera (Whiringa 2): kia whakaitia ngā hāora o te raihana rato waipiro i ngā pāpara kāuta me ngā wharekai o te tāone ki te rua karaka i te ata. Kia katia tonuhia ngā pāpara kāuta me ngā wharekai i waho i te tāone i te tahi karaka i te ata? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): on-licence* closing hours within the Inner City be reduced to a maximum of 2am. On-licence* closing hours for premises outside the Inner City will remain 1am? If you disagree, please indicate your preferred option.* On-licence: allows sale and supply of alcohol for consumption on site, e.g. pub, restaurant View the question on page 14 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q15. Do you have any additional comments?

I strongly support the 2am closing time for on-licensed premises in the Inner City. This reduction in closing times will have a significant reduction in alcohol related harm. It clearly establishes Rotorua as a destination for families and young people while putting the safety of locals and visitors at the forefront. Police data consistently shows that the majority of serious alcohol incidents occur after 1am. Therefore a reduction in closing times combined with a one-way door an hour before closing has the potential to make a measurable difference.

Q16. Do you have any additional comments?

not answered

Q17. E whakaae ana rānei koe ki te whiringa e hiahiaia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, karekau he herenga kia tū tētehi hui tonono wawe e whiwhi ai i tētehi raihana pāpara kāuta e whai pānga ana ki ngā ratonga me whai tūtehi? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, there are no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities? If you disagree, please indicate your preferred option. View the question on page 15 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q18. Do you have any additional comments?

not answered

Q19. Do you have any additional comments?

not answered

Q20. E whakaae ana rānei koe ki te whiringa e Disagree

hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana pāpara kāuta? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for on-licences? If you disagree, please indicate your preferred option. View the question on page 16 on the Statement of Proposal - (PDF, 1.2MB)

Q21. Do you have any additional comments?

not answered

Q22. Do you have any additional comments?

Option 2 provides a wide range of discretionary conditions for the DLC to use particularly for those licensees who have come to the attention of the tri-agencies, largely due to poor management of their premises. Option 2 send a clear signal to the licensees that the Council expects more from licensees than the bare minimum. To stay with the current status quo is I believe a missed opportunity. Not all the discretionary conditions will be applied to every premises, but it will be clear to the licensees that if they do not run a well operated premises then at renewal, or sooner more stringent measures may be applied.

Q23. E whakaae ana rānei koe ki te whiringa e Agree

hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana-karapu? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for club-licences? If you disagree, please indicate your preferred option. View the question on page 18 on the Statement of Proposal - (PDF, 1.2MB)

Q24. Do you have any additional comments?

not answered

Q25. Do you have any additional comments?

not answered

Q26. E whakaae ana rānei koe ki te whiringa e Disagree

hiahia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana motuhake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koDo you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for special-licences? If you disagree, please indicate your preferred option.View the question on page 20 on the Statement of Proposal - (PDF, 1.2MB)

Q27. Do you have any additional comments?

not answered

Q28. Do you have any additional comments?

Option 2 provides a clear signal that a Special Licence is as important as any other license. For any event especially large scale events it is imperative that the applicant is aware of the expectations of the Police, Medical Officer of Health and the Inspector when reporting on Special Licences. The DLC can then add discretionary conditions as required. Many applicants for Special Licences have little idea of their responsibilities. Additional discretionary conditions as suggested in Option 2 may ensure greater compliance with the Sale and Supply of Alcohol Act 2012 and a reduction in alcohol related harm from some events.

Q29. He kupu kōrero atu anō āu?Do you have any other feedback?

I urge the Councillors to consider the wider needs of the community in their decision making. Any opportunity to add conditions in the LAP that may result in a reduction in alcohol related harm can be measured. Please don't waste this opportunity to review the LAP with the full understanding of the high deprivation statistics that have come to define Rotorua. This is an opportunity to focus on promoting a safer Rotorua that cares about locals and visitors alike. Any steps to raise the standard for licensed premises and operators will reduce alcohol harm. Any good operator knows that a premises can be operated well, a strong LAP sends a signal to other licensees that we the Rotorua Community expect them to lift their business practices in line with the best licensees. A strong LAP will set the tone for what we as a community will expect, our current LAP was created in a climate of fear of appeal. That fear no longer applies. Will our new LAP reflect the changing views about alcohol in our community or will it be just more of the same? I am heartened by some of the changes proposed and trust the Councillors will make further changes based on community feedback to ensure that this LAP is more effective and is more reflective of the increased awareness about the cost of alcohol related harm in NZ , currently costing 9 billion annually.

Q30. Tukuatu he puka wea ki koneiUpload a submission here not answered

Q31. Tuhia mai he tāpaetanga e pā ana ki tētahi o ngā kaupapa, otirā ki ngā kaupapa katoaWrite a submission about any/all of the topics.

not answered

Q32. Tō IngoaName Karen Hunt

Q33. Tō ĪmēraEmail address

[REDACTED]

Q34. Kei te pīrangī koe ki te tū i mua i te marea ki te kōrero ki te Kaunihera? Do you wish to present your submission publicly in front of elected members at a hearing? What to expect at a hearing - (PDF, 40KB) Yes

Q35. Tō Wāea Contact number

[REDACTED]

Q36. When would you prefer to present at a hearing? Morning

Q37. I whakaae ahau ki te karangatanga mahi me te kaupapa here noho matatapu o te ratonga karangatanga Engagement HQ I agree to the Terms of Use and Privacy Policy for using Engagement HQ I agree

Submitter – Kerrin Tahata



Respondent No: 109

Login: Anonymous

Email: n/a

Responded At: Mar 28, 2025 00:57:21 am

Last Seen: Mar 28, 2025 00:57:21 am

IP Address: n/a

Q1. I would like to:

Answer the questions online

Q2. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia 3 tau te roa o te aukatinga taupuatanga o te tukunga o ngā raihana toa hoko waipiro me te pōhēhē hoki ka whakaaetia ētehi atu raihana toa hoko waipiro ā muri ake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): a temporary freeze on issuing any new off-licences* for 3 years and a presumption against issuing any new off-licences thereafter**? If you disagree, please indicate your preferred option. *Off-licence: allows sale and supply of alcohol for consumption elsewhere, e.g. bottle store, supermarket **No new off-licences issued for 3 years and after 3 years it will be difficult to be issued a new off-licence View the question on page 9 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q3. Do you have any additional comments?

not answered

Q4. Do you have any additional comments?

not answered

Q5. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia wawe ake te katinga o ngā toa hoko waipiro i te 7 karaka i te ata ki te 9 karaka i te pō? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): Earlier closing times for off-licences making trading hours 7am to 9pm? If you disagree, please indicate your preferred option. View the question on page 10 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q6. Do you have any additional comments?

I Strongly agree I recently found through my journey of alcoholism that it is an addictive gene passed down with my mum her dad and his dad all alcoholics its why I strongly agree because the amount of times I raced to the liquor store at 9:40 to catch the last minutes to keep me fuelled for the next hours and if it wasnt enough id end up in town until it closed stupid I know but this will help heaps current alcoholics if theres enough support for them

Q7. Do you have any additional comments?

not answered

Q8. E whakaae ana rānei koe ki te tono a te Kaunihera kia rite ngā hāora rato ki ngā hāora tuwhera o ngā toa hoko waipiro? Ki te whakahē koe, tēnā whakamāramahia mai. Do you agree or disagree with the Council's proposal to align delivery hours with off-licence opening hours? If you disagree please provide your reasoning. View the question on page 11 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q9. Do you have any additional comments?

not answered

Q10. Do you have any additional comments?

not answered

Q11. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): kia mau tonu ngā whakatairanga herenga here kore me ētehi atu herenga here kore ka āpitihia? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): The current discretionary conditions be retained and further additional discretionary conditions be added? If you disagree, please indicate your preferred option. View the question on page 12 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q12. Do you have any additional comments?

not answered

Q13. Do you have any additional comments?

not answered

Q14. E whakaae ana rānei koe ki te whiringa e hiahiaitia ana e te Kaunihera (Whiringa 2): kia whakaitia ngā hāora o te raihana rato waipiro i ngā pāpara kāuta me ngā wharekai o te tāone ki te rua karaka i te ata. Kia katia tonuhia ngā pāpara kāuta me ngā wharekai i waho i te tāone i te tahi karaka i te ata? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 2): on-licence* closing hours within the Inner City be reduced to a maximum of 2am. On-licence* closing hours for premises outside the Inner City will remain 1am? If you disagree, please indicate your preferred option.* On-licence: allows sale and supply of alcohol for consumption on site, e.g. pub, restaurant View the question on page 14 on the Statement of Proposal - (PDF, 1.2MB)

Disagree

Q15. Do you have any additional comments?

not answered

Q16. Do you have any additional comments?

The amount of times I stayed in town till 3 because I wasnt drunk enough this would save heaps of people

Q17. E whakaae ana rānei koe ki te whiringa e hiahiaitia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, karekau he herenga kia tū tētehi hui tono wawe e whiwhi ai i tētehi raihana pāpara kāuta e whai pānga ana ki ngā ratonga me whai tūtehi? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, there are no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities? If you disagree, please indicate your preferred option. View the question on page 15 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q18. Do you have any additional comments?

not answered

Q19. Do you have any additional comments?

not answered

Q20. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuīnga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana pāpara kāuta? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for on-licences? If you disagree, please indicate your preferred option. View the question on page 16 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q21. Do you have any additional comments?

not answered

Q22. Do you have any additional comments?

not answered

Q23. E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuīnga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana-karapu? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe. Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for club-licences? If you disagree, please indicate your preferred option. View the question on page 18 on the Statement of Proposal - (PDF, 1.2MB)

Agree

Q24. Do you have any additional comments?

not answered

Q25. Do you have any additional comments?

not answered

<p>Q26. E whakaae ana rānei koe ki te whiringa e hiahiaia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana motuhake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koDo you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for special-licences? If you disagree, please indicate your preferred option.View the question on page 20 on the Statement of Proposal - (PDF, 1.2MB)</p>	<p>Agree</p>
<p>Q27. Do you have any additional comments?</p> <p>not answered</p>	
<p>Q28. Do you have any additional comments?</p> <p>not answered</p>	
<p>Q29. He kupu kōrero atu anō āu?Do you have any other feedback?</p> <p>not answered</p>	
<p>Q30. Tukuatu he puka wea ki koneiUpload a submission here</p>	<p>not answered</p>
<p>Q31. Tuhia mai he tāpaetanga e pā ana ki tētahi o ngā kaupapa, otirā ki ngā kaupapa katoaWrite a submission about any/all of the topics.</p> <p>not answered</p>	
<p>Q32. Tō IngoaName</p>	<p>Kerrin Tahata</p>
<p>Q33. Tō ImēraEmail address</p>	<p>[REDACTED]</p>
<p>Q34. Kei te pīrangī koe ki te tū i mua i te marea ki te kōrero ki te Kaunihera?Do you wish to present your submission publicly in front of elected members at a hearing? What to expect at a hearing - (PDF, 40KB)</p>	<p>Yes</p>
<p>Q35. Tō WāeaContact number</p>	<p>[REDACTED]</p>
<p>Q36. When would you prefer to present at a hearing?</p>	<p>Morning</p>
<p>Q37. I whakaae ahau ki te karangatanga mahi me te kaupapa here noho matatapu o te ratonga karangatanga Engagement HQ I agree to the Terms of Use and Privacy Policy for using Engagement HQ</p>	<p>I agree</p>