



**WHANGANUI
DISTRICT COUNCIL**
Te Kaunihera a Rohe o Whanganui

DRAFT LOCAL ALCOHOL POLICY 2017

Submissions received

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170313-75125-P0A
Date: Monday, 13 March 2017 12:01:30 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170313-75125-P0A

Attachment: not attached

Title: Mr

Name: Graeme Robert Musson

E-Mail: graeme@occltd.co.nz

Address

30 Moana Street Wanganui

Phone: 06 343 8002

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Disagree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Agree

Maximum trading hours for restaurants 8am to 12am midnight: Disagree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Disagree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Male

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170313-80YTK-1AFD
Date: Monday, 13 March 2017 1:48:08 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170313-80YTK-1AFD

Attachment: not attached

Title: mrs

Name: angela stratton

E-Mail: strattonfamily@xtra.co.nz

Address

28 maxwell avenue, durie hill

Phone: 3453717

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Agree

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Discretionary conditions may apply to on-licences (pg. 10): Neither agree nor disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Neither agree nor disagree

Discretionary conditions may apply to club licences (pg. 11): Neither agree nor disagree

Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?

Alcohol is a toxic drug that causes harm to the whole of society & needs to be strictly controlled. There is no need for people to have access to it for so many hours a day, nor from places [eg

supermarkets] where children shop. Even if people are addicted, they can still plan their purchases in advance. [I speak as a health professional].

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170314-5DCFH-8XV
Date: Tuesday, 14 March 2017 9:01:56 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170314-5DCFH-8XV

Attachment: not attached

Title: Dr

Name: Keith Boardman

E-Mail: kbordmn@xtra.co.nz

Address

10 Parsons Street
Wanganui

Phone: 3455854

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?

Keep things pretty tight, alcohol abuse is a big problem.

Have you submitted to Council before?: Yes

Gender: Male

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170314-7HIQ7-D65
Date: Tuesday, 14 March 2017 12:57:49 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170314-7HIQ7-D65

Attachment: not attached

Title: Mr

Name: Bernard Corkery

E-Mail: bmcorkery@xtra.co.nz

Address

26D Virginia Road
St Johns Hill
Whanganui

Phone: 027 348 7010

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Disagree

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Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?

Proposed reductions in trading hours a well meant but " nanny state " imposition on a perceived set of circumstances. Sale of Liquor Act provisions have enough ammunition to curb excesses. I favor the US preactice of tracing back source of alcohol in cases of misuse and liquor provided simply shut down to get the message home.

Have you submitted to Council before?: Yes

Gender: Male

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170314-8XMNN-16C6
Date: Tuesday, 14 March 2017 3:00:49 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170314-8XMNN-16C6

Attachment: not attached

Title: Ms

Name: Debbie Wai Kapohe

E-Mail: deborahwaikapohe@gmail.com

Address

55 Grey Street
Whanganui

Phone: 027 809 3726

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Agree

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Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

It is concerning that Whanganui's population is more prone to alcohol related harm. It is good to see

Council focussing on alcohol issues. I would like Council to please also focus on the alternative ways (non-legislative) we can support our community to drink less. For example, I have heard the Matipo community garden has helped some people to limit their alcohol because they have to 'get up in the morning to water their plants.' I also would like to thank Council for providing the land for that initiative. The more people have to live for - jobs, families, hobbies - the less they will drink because alcohol just gets in the way. For me personally, I am pleased with the new lower alcohol wine in the New World Supermarket and congratulate that supermarket for displaying the wine in a prominent place, but, in reality, I would hardly drink at all if it wasn't in the supermarket in the first place. I don't think alcohol should be normalised by selling it with food. Alcohol is not food. It is a treat. In my view it compliments food and food is the highlight, not the alcohol. The culture of alcohol should be that it is for drinking at a special occasion, in moderation and with respect for others. A very good display the Safer Whanganui coordinator did at Council a few years ago was to show the staff how much alcohol was a standard drink, it was very small and an eye opener. As a ratepayer I would like to see some of these ways supported as well as laws.

Have you submitted to Council before?: Yes

Gender: Female

Age: 40-49 years

Ethnicity: Maori

Other ethnicity: Whanganui

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170314-945FA-145E
Date: Tuesday, 14 March 2017 3:30:50 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170314-945FA-145E

Attachment: not attached

Title: MR

Name: BRAD

E-Mail: bj_mcdonald@hotmail.com

Address

143 CARLTON AVE WANGANUI

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Neither agree nor disagree

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Discretionary conditions may apply to off-licences (pg. 10-11): Neither agree nor disagree

Discretionary conditions may apply to club licences (pg. 11): Neither agree nor disagree

Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Male

Age: 18-29 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170314-A8KCE-6GZ
Date: Tuesday, 14 March 2017 5:19:48 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170314-A8KCE-6GZ

Attachment: not attached

Title: Mrs

Name: Colleen Margaret Bunker

E-Mail: bunkcs@gmail.com

Address

2a Virginia Road
Wanganui 4500

Phone: 063458576

Organisation: Whanganui District Health Board

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170314-C2P9X-150D
Date: Tuesday, 14 March 2017 8:28:03 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170314-C2P9X-150D

Attachment: not attached

Title: Mr & Mrs

Name: Lyn & Graham Pearson

E-Mail: pearsongandl@clear.net.nz

Address

9A Waitai Street,
Castlecliff,
Whanganui

Phone: 344 1012

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to off-licences (pg. 10-11): Disagree

Discretionary conditions may apply to club licences (pg. 11): Disagree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

We are concerned about all the venues where alcohol can be brought in Whanganui & the length of time some are opened.

E.g. why does anyone need to buy alcohol before 10 am or after midnight.

& wonder why 2 people can't write on this submission

& why do we need a title ?

Have you submitted to Council before?: Yes

Gender: Male

Age: over 60 years

Ethnicity: not supplied

Other ethnicity: pakeha

From: pearsongandl@clear.net.nz
To: [!Policy Submissions](#)
Subject: alcohol sale rules for Whanganui, our submission
Date: Monday, 15 May 2017 3:38:00 p.m.

- We don't think any alcohol outlets (off-licence, on-licence, stores, supermarket, clubs, etc) should be able to sell alcohol until at least 10 am each morning. (This lets children get to school and people to work first)
-
- We support no new bottle stores. This could be applied to supermarkets and grocery stores, with only transfer of licences allowed for these.
-
- We do not think that supermarkets and grocery stores should be exempt from the restrictions in the draft policy.
-
- We would also like to see all alcohol outlets close for @ least one day a week, & a Sunday seems a good family day to do this.
-
- We support the policy of no new bottle stores permitted close to ECC, schools, marae or places of worship but think this also needs to be extended to include new supermarket & grocery outlets otherwise it is not inclusive enough
-

We believe sales until midnight at clubs, is to late in the evening. It should be brought back and a special licence required to go this late, for New Year etc

- We are concerned about the harm alcohol does to our vulnerable people and the Community as a whole, and the costs of picking up the mess has to be born by the local Community. Whanganui can do better than that and we all need to accept the changes proposed and work towards a better situation for everyone.
-
- Data shows Whanganui has high hazard rates, relative to the rest of NZ, so we should move to put in place restrictions and limitations

Thank you for the opportunity to submit

Graham & Lyn Pearson
9A Waitai Street
Whanganui 4501
06 344 1012
pearsongandl@clear.net.nz

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170315-6T2X1-13WV
Date: Wednesday, 15 March 2017 11:43:33 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170315-6T2X1-13WV

Attachment: not attached

Title: Ms

Name: Janis Cusack

E-Mail: not supplied

Address

46 Cameron Rd west, RD 4 Wanganui.

Phone: 3458718

Organisation: N/A

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to club licences (pg. 11): Disagree

Discretionary conditions may apply to special licences (pg. 11): Disagree

Do you have any further comments to make?

Really important to limit excessive alcohol intake/indulgence in public places that affects innocent folk

via car accidents, family violence, drunken teenage pranks/parties.
Our community has a responsibility to impose limits before the tragedies happen.

Have you submitted to Council before?: Yes

Gender: Female

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170315-9NXIZ-JKG
Date: Wednesday, 15 March 2017 4:23:19 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170315-9NXIZ-JKG

Attachment: not attached

Title: Miss

Name: Ashleigh Cave

E-Mail: ashleigh.cave@wdhb.org.nz

Address

3 Millward Street

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly disagree

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Discretionary conditions may apply to special licences (pg. 11): not supplied

Do you have any further comments to make?

All that will result in a one-way door, an hour before closing, will be people standing on the street,

hovering, causing trouble while waiting for their friends. In stead of being inside, where they are entertained and staff can manage them.

Have you submitted to Council before?: No

Gender: Female

Age: not supplied

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170316-4HOCB-120L
Date: Thursday, 16 March 2017 7:54:25 a.m.
Attachments: [Alcohol No Ordinary Commodity.pdf](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170316-4HOCB-120L

Attachment: attached

Title: Mr.

Name: Chester Penaflor

E-Mail: chester.penaflor@wdhb.org.nz

Address

29A Carlton Ave., Gonville, Whanganui

Phone: 06 348 3150

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

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Do you have any further comments to make?

The 5+ Solution is a set of policy directives based on the internationally acclaimed, World Health Organisation sponsored, publication, "Alcohol: No Ordinary Commodity" written by fifteen of the top alcohol and public health scientists in the world (Babor et al 2003). It has recently been further endorsed by a paper in the leading medical journal The Lancet (Anderson et al 2009).

The 5+ Solution

1. Raise alcohol prices
 2. Raise the purchase age
 3. Reduce alcohol accessibility
 4. Reduce marketing and advertising
 5. Increase drink-driving counter-measures
- PLUS: Increase treatment opportunities for heavy drinkers

The way I see it, the Local Alcohol Policy supports at least 2 of these solutions namely reduce alcohol accessibility and reduce marketing/advertising (addressed by the consideration to sensitive locations and restriction to both numbers of off-licenses and maximum trading hours).

In addition to this, research supports that restricting licensing hours for alcohol sales, restricting density of outlets and banning alcohol advertising are the strategies more likely to reduce alcohol-related harm which is the main reason why we need a policy in the first place. Having said that, one reason why health education programmes doesn't work is because of its inability to compete with marketing and advertising campaigns by the alcohol industry.

Thank you for this opportunity.

Have you submitted to Council before?: No

Gender: Male

Age: 40-49 years

Ethnicity: Asian

Other ethnicity: not supplied

Alcohol: No Ordinary Commodity – a summary of the second edition

Alcohol and Public Policy Group

STRONGEST, MOST-EFFECTIVE STRATEGIES

1. TAXATION
2. RESTRICTION ON AVAILABILITY OF ALCOHOL
3. DRINK-DRIVING MEASURES
4. BRIEF INTERVENTIONS
5. TREATMENT OF DRINKERS W/
ALCOHOL DEPENDENCE

ABSTRACT

This article summarizes the contents of *Alcohol: No Ordinary Commodity* (2nd edn). The first part of the book describes why alcohol is not an ordinary commodity, and reviews epidemiological data that establish alcohol as a major contributor to the global burden of disease, disability and death in high-, middle- and low-income countries. This section also documents how international beer and spirits production has been consolidated recently by a small number of global corporations that are expanding their operations in Eastern Europe, Asia, Africa and Latin America. In the second part of the book, the scientific evidence for strategies and interventions that can prevent or minimize alcohol-related harm is reviewed critically in seven key areas: pricing and taxation, regulating the physical availability of alcohol, modifying the drinking context, drink-driving countermeasures, restrictions on marketing, education and persuasion strategies, and treatment and early intervention services. Finally, the book addresses the policy-making process at the local, national and international levels and provides ratings of the effectiveness of strategies and interventions from a public health perspective. Overall, the strongest, most cost-effective strategies include taxation that increases prices, restrictions on the physical availability of alcohol, drink-driving countermeasures, brief interventions with at risk drinkers and treatment of drinkers with alcohol dependence.

Keywords Alcohol, alcohol industry, alcohol problems, policy, prevention, treatment.

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SETTING THE POLICY AGENDA

From a public health perspective, alcohol plays a major role in the causation of disability, disease and death on a global scale. With the increasing globalization of alcohol production, trade and marketing, alcohol control policy needs to be understood not only from a national perspective but also from an international purview. The same is true of alcohol science, particularly policy research. In the past 50 years considerable progress has been made in the scientific understanding of the relationship between alcohol and health. Ideally, the cumulative research evidence should provide a scientific basis for public debate and governmental policy making. However, much of the scientific evidence is reported in academic publications and the relevance of this information for alcohol policy often goes unrecognized. To address the need for a policy-relevant analysis of the alcohol research literature, the

authors published the first edition of *Alcohol: No Ordinary Commodity* in 2003, continuing in the tradition of integrative reviews dating back to 1975 [1,2].

The revised, second edition of *Alcohol: No Ordinary Commodity* [3] reflects the considerable expansion of scientific evidence for effective alcohol policy since the original publication. The second edition also responds to the fact that many parts of the world that have traditionally had relatively low aggregate levels of alcohol consumption and weak alcohol controls (e.g. sub-Saharan Africa and parts of Asia) are experiencing an expansion of commercial production and sophisticated marketing campaigns by the alcohol industry.

NO ORDINARY COMMODITY

Alcoholic beverages are an important, economically embedded commodity. Alcohol provides employment for

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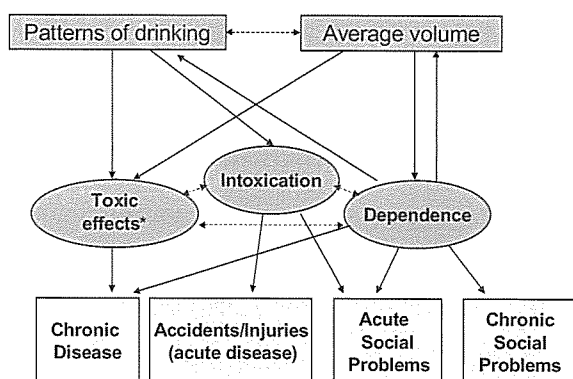


Figure 1 Why alcohol is no ordinary commodity: relationships among alcohol consumption, mediating factors and alcohol-related consequences (reprinted with permission)

people in bars, restaurants and the agricultural sector, brings in foreign currency for exported beverages and generates tax revenues for the government, but the economic benefits connected with the production, sale and use of this commodity come at an enormous cost to society. Three important mechanisms explain alcohol's ability to cause medical, psychological and social harm: (1) physical toxicity, (2) intoxication and (3) dependence.

Alcohol is a toxic substance in terms of its direct and indirect effects on a wide range of body organs and systems [4]. With chronic drinking and repeated intoxication a syndrome of interrelated behavioural, physical and cognitive symptoms develops, referred to as alcohol dependence. As illustrated in Fig. 1, the mechanisms of toxicity, intoxication and dependence are related to the ways in which people consume alcohol, referred to as 'patterns of drinking'. Drinking patterns that lead to elevated blood alcohol levels result in problems associated with acute intoxication, such as accidents, injuries and violence. Drinking patterns that promote frequent and heavy alcohol consumption are associated with chronic health problems such as liver cirrhosis, cardiovascular disease and depression. Sustained drinking may also result in alcohol dependence, which impairs a person's ability to control the frequency and amount of drinking. For these reasons, alcohol is not a run-of-the-mill consumer substance.

ALCOHOL CONSUMPTION TRENDS AND PATTERNS OF DRINKING

Alcohol consumption varies enormously, not only among countries but also over time and among different population groups. Alcohol consumption per capita is highest in the economically developed regions of the world. It is generally lower in Africa and parts of Asia, and is particularly low in the Indian subcontinent and in Moslem countries

and communities. Western Europe, Russia and other non-Moslem parts of the former Soviet Union now have the highest per capita consumption levels, but levels in some Latin American countries are not far behind [4,5].

With a few exceptions, there has been a levelling-off or decline in drinking in many of the high alcohol consumption countries from the early 1970s to the early 2000s, particularly in the traditional wine-producing countries in Europe and South America [6]. In contrast, increases in per capita consumption have been noted in emerging markets for alcohol in many low- and middle-income countries [5].

As the per capita consumption in a population increases the consumption of the heaviest drinkers also rises, as does the prevalence of heavy drinkers and the rate of alcohol-related harm [7,8]. Much of the variation in alcohol consumption from one part of the world to another is attributable to differences in the proportions of adults who abstain from drinking altogether. This suggests that per capita consumption will increase steeply if the proportion of abstainers declines, particularly in the developing world, where abstention is common.

Men are more likely to be drinkers, and women abstainers. Among drinkers, men drink 'heavily' (i.e. to intoxication, or large quantities per occasion) more often than women. Older age groups favour abstinence and infrequent drinking while young adults have higher levels of frequent intoxication [9].

The composition of social and health problems from drinking in any particular country or region is related to the drinking patterns and total amounts consumed in that country or region. These differences may help to explain why prevention and intervention strategies vary from one society to another. However, with the spread of commercial alcohol increasing homogeneity in drinking patterns, alcohol policy needs are likely to become increasingly similar.

THE GLOBAL BURDEN OF ALCOHOL CONSUMPTION

Alcohol accounts for approximately 4% of deaths worldwide and 4.65% of the global burden of injury and disease, placing it alongside tobacco as one of the leading preventable causes of death and disability [4,10]. In high-income countries, alcohol is the third most detrimental risk factor, whereas in emerging economies such as China alcohol ranks first among 26 examined. Some of the most important individual harms related to alcohol are coronary heart disease, breast cancer, tuberculosis, motor vehicle accidents, liver cirrhosis and suicide. Overall, injuries account for the largest portion of the alcohol-attributable burden. Volume of drinking is linked to most disease outcomes through specific dose-response

relationships. Patterns of drinking also play an important role in the disease burden. Coronary heart disease (CHD), motor vehicle accidents, suicide and other injuries have all been linked to heavy episodic drinking [4]. Moderate drinking has CHD benefits for some individuals, but has also been linked to an increased risk of cancer and other disease conditions.

Alcohol consumption is also a risk factor for a wide range of social problems [11]. Although there is plausible evidence for a direct causal link between alcohol consumption and violence [12], the relationship is more complex for problems such as divorce, child abuse and work-related problems. Alcohol consumption can impact negatively people other than the drinker through alcohol-related crime (e.g. domestic violence), family dysfunction, traffic accidents and problems in the work-place. In sum, alcohol contributes to both social and health burdens.

GLOBAL STRUCTURE AND STRATEGIES OF THE ALCOHOL INDUSTRY

The alcohol industry is an important but understudied part of the environment in which drinking patterns are learned and practised, especially with the growth of modern industrial production, the proliferation of new products (e.g. caffeinated alcohol 'energy drinks' and alcopops) and the development of sophisticated marketing techniques. At the national level, the industry comprises beer, wine and spirits producers and importers, as well as bars, restaurants, bottle stores and often food stores that sell alcohol to the public. Alcohol is seen as an important contributor to business opportunities and jobs in the hospitality and retail sectors.

In recent years the international alcohol market has become dominated by a few large corporations [13,14]. In 2005, 60% of the world's commercially brewed beer was produced by global companies, with 44% made by the largest four: Inbev, Anheuser Busch, SABMiller and Heineken. A similar trend has occurred in the spirits sector, with Diageo and Pernod Ricard now managing some of the world's leading brands. The size and profitability of these companies support integrated marketing on a global scale. Size also allows considerable resources to be devoted, directly or indirectly, to promoting the policy interests of the industry. These developments challenge the public health sector and governments to respond with national and global public health strategies to minimize the health consequences and social harms resulting from the expanding global market in alcoholic beverages.

It is often assumed that an industrialized alcohol supply will have positive economic effects in low-income countries, but the evidence for this is equivocal, particularly concerning job creation [15]. Research suggests that alcohol problems increase with economic develop-

ment [16]. Many developing countries have alcohol laws and policies but often do not have the resources to enforce them adequately.

THE INTERNATIONAL CONTEXT OF ALCOHOL POLICY

Alcohol control policies at the national and local levels have come increasingly under pressure because of conflict with international trade policies, which tend to treat alcoholic beverages as ordinary commodities such as bread and milk [17]. At the beginning of 2000 there were 127 trade agreements registered at the World Trade Organization, most of which apply to trade in alcoholic beverages. Trade agreements generally require governments to reduce and eventually abolish all tariff and non-tariff barriers to international trade.

When alcohol is regarded as an ordinary commodity, these agreements often hamper the effectiveness of alcohol control policies. With the growing emphasis on free trade and free markets, international organizations such as the European Union have pushed to dismantle state alcohol monopolies and other restrictions on the availability of alcoholic beverages, and disputes under trade agreements have resulted in reduced taxes and other increases in availability [18,19]. Nevertheless, the impact of international trade agreements and economic treaties cannot be blamed entirely for the lack of effective alcohol control policies at the national level. Although trade agreements constrain how domestic regulations are designed, they also allow government measures to protect human and environmental health specifically. Policies restricting the supply and marketing of alcohol have been defended successfully against challenge as both necessary and proportionate to achieving a clearly stated government health goal. However, restrictive policies often have an aspect that is protective of local economic interests, which makes them difficult to defend. At the international level, public health considerations concerning alcohol must have precedence over free trade interests [17].

STRATEGIES AND INTERVENTIONS TO REDUCE ALCOHOL-RELATED HARM

Alcohol policy is defined broadly as any purposeful effort or authoritative decision on the part of governments to minimize or prevent alcohol-related consequences. Policies may implement a specific strategy with regard to alcohol problems (e.g. increase alcohol taxes or controls on drinking and driving) or allocate resources toward prevention or treatment services.

Effective policies are evidence-informed and based upon sound theory, which increases the likelihood that a policy that is effective in one place will be effective in

Table 1 Theoretical assumptions underlying seven broad areas of alcohol policy, and the 'best practices' identified within each policy area.

Policy approach	Theoretical assumption	Best practices ^a
Alcohol taxes and other price controls	Increasing economic cost of alcohol relative to alternative commodities will reduce demand	Alcohol taxes
✓ <u>Regulating physical availability through restrictions on time and place of sales and density of alcohol outlets</u>	<u>Restricting physical availability will increase effort to obtain alcohol, and thereby reduce total volume consumed as well as alcohol-related problems</u>	<u>Ban on sales, minimum legal purchase age, rationing, government monopoly of retail sales, hours and days of sale restrictions, restrictions on density of outlets, different availability by alcohol strength</u>
Altering the drinking context	Creating environmental and social constraints will limit alcohol consumption and reduce alcohol-related violence	Enhanced enforcement of on-premises policies and legal requirements
Drink-driving countermeasures	Deterrence, punishment and social pressure will reduce drink driving	Sobriety checkpoints, random breath testing, lowered BAC limits, administrative licence suspension, low BAC for young drivers ('zero tolerance'), graduated licensing for novice drivers
Education and persuasion: <u>provide information to adults and young people especially through mass media and school-based alcohol education programmes</u>	Health information that increases knowledge and changes attitudes will prevent drinking problems	None
✓ <u>Regulating alcohol advertising and other marketing</u>	<u>Reducing exposure to marketing which normalizes drinking and links it with social aspirations will slow recruitment of drinkers and reduce heavier drinking by young people</u>	<u>Legal restrictions on exposure</u>
✓ <u>Conduct screening and brief intervention in health care settings; increase availability of treatment programmes</u>	<u>Alcohol dependence will be prevented by motivating heavy drinkers to drink moderately; various therapeutic interventions will increase abstinence among people who have developed a dependence on alcohol</u>	<u>Brief interventions with at-risk drinkers, detoxification, talk therapies, mutual help/self-help organization attendance</u>

^aBased on consensus ratings of effectiveness, amount of scientific evidence and cross-national testing, these strategies and interventions received two or more plusses (on a scale of 0–3) in all three categories. BAC: blood alcohol concentration.

others. Research has the capacity to indicate which strategies have demonstrated successful achievement of their public health intentions and which have not. Table 1 lists the seven main areas within which alcohol policies have been developed and describes the theoretical assumptions behind each policy approach as well as the specific interventions that have been found to be 'best practices' because of the evidence of effectiveness, amount of research support and extent of testing across diverse countries and cultures.

CONTROLLING AFFORDABILITY: PRICING AND TAXATION

Governments have long used customs tariffs on alcohol imports and excise duties on domestic production to

generate tax revenue and to reduce rates of harm from drinking. Dozens of studies, including a growing number in developing countries, have demonstrated that increased alcohol prices reduce the level of alcohol consumption and related problems, including mortality rates, crime and traffic accidents (see [17,20,21]). The evidence suggests that the effects of pricing apply to all groups of drinkers, including young people and heavy or problem drinkers, who are often the focus of government attention.

Some governments have restricted discounted sales or established minimum sale prices for alcoholic beverages. While somewhat limited, the evidence suggests that raising the minimum price of the cheapest beverages is effective in influencing heavy drinkers and reducing rates of harm [22]. Other research [23] shows that alcohol consumption can be reduced by increasing the price of

drinks (e.g. alcopops) that are designed and marketed in a way that appeals to young adults.

Despite its apparent effectiveness, taxation as a method of reducing harm from drinking appears to have been under-used. In recent decades, the real price of alcoholic beverages has decreased in many countries, at a time when other alcohol control measures have been liberalized or abandoned completely [19,24,25]. Prices have declined partly because governments have not increased tax levels in accordance with inflation and rising incomes. In some cases alcohol taxes have been reduced to compete with cross-border imports and smuggling, or to comply with trade dispute decisions.

REGULATING THE PHYSICAL AVAILABILITY OF ALCOHOL

Restrictions on alcohol availability focus upon regulating the places, times and contexts in which consumers can obtain alcohol, and include both partial and total bans on alcohol sales. There is great variability in regulation of access to alcohol. A number of countries have monopolies for at least some form of retail sale, and many Islamic states and some localities elsewhere practice total prohibition. In contrast, there is concern in many developing countries that cheap, informal-produced and illegal alcohol is largely unregulated [17].

✓ Research indicates strongly that as alcohol becomes more available through commercial or social sources, consumption and alcohol-related problems rise. Conversely, when availability is restricted, alcohol use and associated problems decrease. The best evidence comes from studies of changes in retail availability, including reductions in the hours and days of sale, limits on the number of alcohol outlets and restrictions on retail access to alcohol [16,26–28]. Consistent enforcement of regulations is a key ingredient of effectiveness. ✓ Licence suspensions and revocations often provide the most direct and immediate enforcement mechanism.

Government ownership of alcohol outlets can regulate alcohol availability in a comprehensive way. There is strong evidence that off-premises monopoly systems limit alcohol consumption and alcohol-related problems if alcohol control is a central goal, and that elimination of those monopolies can increase total alcohol consumption, especially when privatization leads to increased outlets, expanded hours of sale and reductions in the enforcement of policies such as not selling to underage customers [29,30].

For young people, laws that raise the minimum purchase age reduce alcohol sales and problems, if they are enforced at least minimally. This strategy has strong empirical support, with research indicating substantial

impacts on traffic and other casualties from changes to the purchase age [23,31,32].

In general, the regulation of availability can have large effects. The cost of restricting physical availability of alcohol is cheap relative to the costs of health consequences related to drinking, especially heavy drinking. The most notable adverse effects of availability restrictions include increases in informal market activities (e.g. home production, illegal imports). Nevertheless, where a legal supply is available, informal market activities can generally be limited by effective enforcement.

MODIFYING THE DRINKING CONTEXT

Alcohol is consumed in a variety of places. Research suggests that licensed premises provide an opportunity for preventing alcohol-related problems through training bar staff in both responsible beverage service and managing or preventing aggression [33,34]. However, responsible beverage service is only effective if accompanied by enforcement. Enhanced enforcement of laws and regulations by police, liquor licensing, municipal authorities and other methods is likely to have impact through situational deterrents, in particular the threat of suspending or revoking the licence to sell in cases of irresponsible selling and, where laws permit, through holding servers and owners liable for the harms resulting from over-service.

Community action programmes, wherein local organizers work with the police, are an effective strategy for reducing problem behaviour when focused upon licensed premises, possibly because these are able to incorporate broad multi-component approaches [35,36]. However, these programmes require extensive resources and long-term commitment, including enhanced and sustained enforcement.

DRINK-DRIVING PREVENTION AND COUNTERMEASURES

Alcohol is a major risk factor for traffic fatalities and injuries and an issue of great concern in emerging alcohol markets with rapidly expanding ownership of motor vehicles. Traditionally, law enforcement directed at drink-driving has been designed to catch offenders on the assumption that such practices will deter people from driving after drinking. There is limited evidence to support the positive impact of these laws, perhaps because they are enforced inconsistently and the punishment is often delayed. The one punishment that seems to have a consistent impact on drink-driving offences is administrative licence suspension or revocation for drink-driving [37,38].

The evidence indicates that laws setting a reasonably low level of blood alcohol concentration (e.g. 0.05%) at which one may drive legally, combined with well-publicized enforcement, reduces drink-driving and alcohol-related driving fatalities significantly. This is a required first step for effective drink-driving policy [39,40].

The evidence is strong that frequent highly visible, non-selective testing (and selective testing if carried out with sufficient intensity) can have a sustained effect in reducing drink-driving and the associated crashes, injuries and deaths [41,42]. The most effective approach is random breath testing or compulsory breath testing. Sobriety checkpoints also increase the public perception of likelihood of apprehension.

Several approaches reduce recidivism of drink-driving, including counselling or therapy plus licence suspension and ignition interlock devices that prevent a vehicle from being started until the driver passes a breath test [43]. While 'designated driver' and 'safe ride programmes' may have some effect for people who, presumably, would otherwise drive while intoxicated, no overall impact on alcohol-involved accidents has been demonstrated [44].

Effective interventions for young drivers, who are at higher risk for traffic accidents, include a policy of zero tolerance [i.e. setting a blood alcohol concentration (BAC) level as close to 0% as possible] and the use of graduated licensing for novice drivers (i.e. limits on the time and other conditions of driving during the first few years of licensing) [45,46]. Traditional countermeasures such as driver training and school-based education programmes are either ineffective or yield mixed results.

RESTRICTIONS ON MARKETING

Alcohol marketing is a global industry. Many countries are now subject to unprecedented levels of exposure to sophisticated marketing, through traditional media (e.g. television, radio and print), new media (e.g. internet and cell phones), sponsorships and direct promotions, including branded merchandise and point-of-sale displays.

Evidence shows that exposure of young people to alcohol marketing speeds up the onset of drinking and increases the amount consumed by those already drinking. The extent of research available is considerable (e.g. [47–49]), and shows effects consistently with young people. Marketing contributes undoubtedly to the ongoing recruitment of young people to replace older drinkers and to expand the drinking population in emerging markets.

Legislation restricting alcohol advertising is a well-established precaution used by governments throughout the world, despite opposition from the alcohol industry.

However, many bans have been partial, applying only to spirits, to certain hours of television broadcasting or to state-owned media. They have covered only the measured media, which represents only about half the marketing currently in force. These bans often operate alongside codes of industry self-regulation that specify the content of permitted forms of alcohol advertising.

Imposing total or partial bans on advertising produce, at best, small effects in the short term on overall consumption in a population, in part because producers and sellers can simply transfer their promotional spending into allowed marketing approaches. The more comprehensive restrictions on exposure (e.g. in France) have not been evaluated.

However, the fact that exposure to marketing produces an effect on alcohol consumption puts the question of controls on advertising high on the policy agenda. The extent to which effective restrictions would reduce consumption and related harm in younger age groups remains an open question. The most probable scenario, based upon the theoretical and empirical evidence available, is that extensive restriction of marketing would have an impact.

Despite industry claims that they adhere to codes of responsible advertising, the detrimental influences of exposure to marketing messages are not addressed adequately by the voluntary codes on the content of alcohol advertisements adopted by the industry under a self-regulation approach. Self-regulation by means of industry voluntary codes does not seem to prevent the kind of marketing that has an appeal to younger people [17,49,50].

The evidence demonstrating the impact of current levels of marketing on the recruitment of heavier-drinking young people suggests the need for a total ban to restrict exposure to alcohol marketing, one that is able to cross national boundaries.

EDUCATION AND PERSUASION STRATEGIES

Education and persuasion strategies are among the most popular approaches to the prevention of alcohol-related problems. Some school-based alcohol education programmes have been found to increase knowledge and change attitudes toward alcohol, but drinking behaviour often remains unaffected [51]. Many programmes include both resistance skills training and normative education, which attempts to correct adolescents' tendency to overestimate the number of their peers who drink or approve of drinking. Scientific evaluations of these programmes have produced mixed results, with generally modest effects that are short-lived unless accompanied by booster sessions [52]. Some programmes include both

individual-level education and family- or community-level interventions. Evaluations suggest that even these comprehensive programmes may not be sufficient to delay the initiation of drinking, or to sustain a small reduction in drinking beyond the operation of the programme. The strongest effects have been found in programmes directed at high-risk groups, an approach akin to assessment and brief intervention [52–54].

Media campaigns prepared by government agencies and non-governmental organizations (NGOs) that address responsible drinking, the hazards of drink-driving and related topics are an ineffective antidote to the high-quality pro-drinking messages that appear much more frequently as paid advertisements in the mass media [17].

In sum, the impact of education and persuasion programmes tends to be small, at best. When positive effects are found, they do not persist and a focus upon educating and persuading the individual drinker to change his or her behaviour without changing the broader environment cannot be relied upon as an effective approach.

TREATMENT AND EARLY INTERVENTION SERVICES

During the past 50 years there has been a steady growth, primarily in high-income countries, in the provision of specialized medical, psychiatric and social services to individuals with alcohol use disorders. Typically, treatment involves a range of services from diagnostic assessment to therapeutic interventions and continuing care. Researchers have identified more than 40 therapeutic approaches evaluated by means of randomized clinical trials [55]. These are delivered in a variety of settings, including freestanding residential facilities, psychiatric and general hospital settings, out-patient programmes and primary health care. More recently, treatment services in some countries have been organized into systems that are defined by linkages between different facilities and levels of care, and by the extent of integration with other types of services, such as mental health, drug dependence treatment and mutual help organizations.

Regarding the clinical management of non-dependent high-risk drinkers, the cumulative evidence [56] shows that brief interventions, consisting of one or more sessions of advice and feedback provided by a health professional, can produce clinically significant reductions in drinking and alcohol-related problems. Despite evidence of the benefits of brief interventions, it has been found difficult to persuade practitioners to deliver such care.

Specialized or formal treatment consists of detoxification, out-patient counselling and residential care. Detoxification services are directed mainly at patients with a history of chronic drinking (especially those with poor

nutrition) who are at risk of experiencing withdrawal symptoms. Administration of thiamine and multi-vitamins is a low-cost, low-risk intervention that prevents alcohol-related neurological disturbances, and effective medications have been used for the treatment of alcohol withdrawal. Treatment that obviates development of the most severe withdrawal symptoms can be life-saving.

Following detoxification, a variety of therapeutic modalities have been incorporated into different service settings to treat the patient's drinking problems, promote abstinence from alcohol and prevent relapse. In most comparative studies, out-patient and residential programmes produce comparable outcomes [57]. The approaches with the greatest amount of supporting evidence are behaviour therapy, group therapy, family treatment and motivational enhancement.

Despite advances in the search for a pharmacological intervention that could reduce craving and other precipitants of relapse (alcohol-sensitizing drugs, medications to directly reduce drinking and medications to treat co-morbid psychopathology), the additive effects of pharmacotherapies have been marginal beyond standard counselling and behaviour therapies [58,59].

Mutual help societies composed of recovering alcoholics are inexpensive alternatives and adjuncts to treatment. Mutual help groups based on the Twelve Steps of Alcoholics Anonymous (AA) have proliferated throughout the world. In some countries other approaches, often orientated to the family as well as the drinker, are also flourishing. Research suggests that AA itself can have an incremental effect when combined with formal treatment, and that AA attendance alone may be better than no intervention at all [60].

ADJUNCTS TO TREATMENT.

THE POLICY ARENA

Alcohol policies are developed and implemented at many different levels of government. National or subnational laws often establish the legislative framework, including an oversight by the state of production, export and import of commercial alcohol products; control of wholesaling and retailing; legal minimum purchase ages for alcoholic beverages; apprehension of drivers with specified blood alcohol levels; alcohol marketing restrictions; and the support of treatment and prevention services. For this reason, policy systems at the national level are dominated rarely by one decision-making authority, but tend rather to be decentralized, with different aspects of policy delegated to a variety of different and sometimes competing decision-making entities, such as the health ministry and the taxation agency.

Public interest groups, often represented by NGOs, contribute to the policy-making process in many countries. More recently, alcohol issues have become increas-

ingly the concern of health professionals, mirrored by a change in the organization of health and welfare services as well as increasing professionalization in the 'caring' occupations. International agencies, such as the World Health Organization, can also play an important role.

In many nations there is a vacuum in advocacy for the public interest. Commercial interests have moved increasingly into this vacuum in the policy arena. Although the alcohol industry is not monolithic in terms of its motives, power or operations, in most instances the industry's producers, retailers and related groups share a common commercial imperative to make a profit. To promote their policy objectives, over the past 25 years the largest alcohol companies have set up more than 30 'social aspects' organizations, mainly in Europe, the United States and, more recently, in the emerging markets of Asia and Africa [61.62]. Typically, social aspects organizations promote a set of key messages that support ineffective policies for reducing harm [61.63]. Experience suggests that working in partnership with the alcohol industry is likely to lead to ineffective or compromised policy and is best avoided by governments, the scientific community and NGOs [64].

An appreciation of the various players in the alcohol policy arena can heighten our understanding of the following fundamental conclusion: alcohol policy is often the product of competing interests, values and ideologies.

ALCOHOL POLICIES: A CONSUMER'S GUIDE

Table 1 lists 20 'best practices' that represent the most effective, evidence-based policy approaches to reduce alcohol-related harm. Many of the interventions are universal measures that restrict the affordability, availability and accessibility of alcohol. Alcohol taxes and restrictions limiting the opening hours, locations and density of alcohol outlets have a considerable amount of research support. The enforcement of a minimum purchase age for alcohol is another very effective strategy. Given their broad reach, the expected impact of these measures on public health is relatively high, especially when the informal market and illegal alcohol production can be controlled. Many drink-driving countermeasures received high ratings as well, especially those that increase the likelihood of apprehension and are part of a core alcohol policy mix.

Alcohol treatment services have good evidence of effectiveness but they can be expensive to implement and maintain, with the exception of mutual help organizations. At the population level, their impact is limited relative to other policy options, as full treatment for alcohol problems can benefit only those individuals who come to treatment. Nevertheless, these programmes have the

potential to impact the heaviest drinkers in a society, and could lower population levels of alcohol consumption and harm if they could be disseminated widely.

Although the evidence is limited by the relative lack of research, it is likely that a total ban on the full range of marketing practices could affect drinking by young people, particularly if diversion of the promotional spending to other channels were blocked. There is no evidence that the alcohol industry's favoured alternative to marketing restrictions—voluntary self-regulation—protects vulnerable populations from exposure to alcohol advertising and other marketing practices.

The amount of evidence on the effects of altering the drinking context has been growing, and we now think that strategies in this area can have modest effects. The fact that these strategies are applicable primarily to on-premises drinking in bars and restaurants somewhat limits their public health significance, as a high proportion of alcohol is purchased more cheaply for consumption elsewhere.

Despite a growing amount of research using randomized controlled research designs, there is only weak evidence for the effectiveness of programmes that combine alcohol education with more intensive family and community involvement. Similarly, the expected impact is low for mass media 'responsible drinking' campaigns. Although the reach of educational programmes is thought to be excellent, the population impact of these programmes is poor, and effectiveness is limited to several of the more recent college programmes.

Policy options are often moulded to existing conditions and are implemented typically over time in a way that is fragmented, piecemeal and uncoordinated, in part because of the range of policy areas covered, in part because different ministries, departments and administrative agencies each have some aspect of alcohol policy under their purview. As a result, most countries do not have a single comprehensive policy towards alcohol but rather fragmented regulations and practices that sometimes are based upon profoundly different assumptions about the role of alcohol in society and the nature of alcohol-related problems. To enhance the likelihood of effectiveness, alcohol policies would benefit from greater public health orientation, integration and coordination.

In sum, opportunities for evidence-based alcohol policies that serve the public good more effectively are more available than ever before. However, the policies to address alcohol-related problems are too seldom informed by science, and there are still too many instances of policy vacuums filled by unevaluated or ineffective strategies and interventions. Because alcohol is no ordinary commodity, the public has a right to expect a more enlightened approach to alcohol policy.

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From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170317-7HX58-I5U
Date: Friday, 17 March 2017 12:59:20 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170317-7HX58-I5U

Attachment: not attached

Title: mr

Name: Mark Wood

E-Mail: markw15@xtra.co.nz

Address

39 Paterson street
Aramoho

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

This local plan is great and should be supported by the council, it is time we changed the culture around alcohol in the city. In a city focussed on families and health we need to send a clear message. the correlation between violence and abuse with alcohol use is plain to see. Well done for adopting this policy.

Have you submitted to Council before?: No

Gender: Male

Age: 50-59 years

Ethnicity: not supplied

Other ethnicity: british

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170317-8KW6I-CMW
Date: Friday, 17 March 2017 2:41:09 p.m.
Attachments: [Xmas Alcohol Sales 2.docx](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170317-8KW6I-CMW

Attachment: attached

Title: Mr

Name: Michael James Woodhead

E-Mail: michael.woodhead@foodstuffs.co.nz

Address

59 Anzac Parade
Durie Hill

Phone: 063454198

Organisation: 4 Square

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly disagree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly disagree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly disagree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly disagree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly disagree

Discretionary conditions may apply to club licences (pg. 11): Disagree

Discretionary conditions may apply to special licences (pg. 11): Disagree

Do you have any further comments to make?

I do not believe the proposed restrictions to the off licence hours will make a difference to alcohol consumption.

Where this will impact, is on the illegal sales of alcohol over social media (e.g. Whanganui Buy Sell, Swap).

This will mean unqualified people will be selling Alcohol to anybody that has the money to purchase. How they get that money though - legal or illegal means is to be seen. As it seems nothing is being done in this area by any council in NZ this issue is only going to grow bigger.

Attached are a couple of Screen shots of Christmas day 2016

Have you submitted to Council before?: No

Gender: Male

Age: 40-49 years

Ethnicity: NZ European

Other ethnicity: Wanganui

On this Day

Friend Lists

Games

Shops

Pokes


6

cruisers

\$40

Wanganui, New Zealand

Don't comment if you ain't gonna buy.
\$40 each
2 4 60



Message Seller

Like

Comment

👍 😂 5

Page 3 of 4

EXPLORE

25

Events

Saved

Pages

Groups

Photos

On this Day

Friend Lists

Games

Shops

Attention Antic Goers!

FREE

📍

Little Wanganui, New Zealand

Merry Christmas Whanau, hope your all having a wonderful day full of joy and love!

Got Afew boxes here for anyone who's going haard, or simply forgot to stock up yesterday as it's a busy time of year and we all forget now and then!

Prices are firm as listed so, please save the negotiations.


12 box Codys 7% = \$40 ech

12 box (Exotic fruits or Passionfruit) Cruisers 7% = \$40 ech

18 box Billy Mavs 7% = \$50

15 box Export Gold = \$40

Pm for any further questions and/or pick up location. Kia Kaha!



From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170320-6NXHF-2IC
Date: Monday, 20 March 2017 11:19:47 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170320-6NXHF-2IC

Attachment: not attached

Title: Mrs

Name: Melanie Maniapoto

E-Mail: mel.john91@yahoo.com

Address

26 Lincoln Road
Springvale
Whanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Agree

Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Agree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: Yes

Gender: Female

Age: 40-49 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170320-6VFKC-FGF
Date: Monday, 20 March 2017 11:54:48 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170320-6VFKC-FGF

Attachment: not attached

Title: Mr

Name: Darryl Hausman

E-Mail: darryl@mcdonaldequipment.co.nz

Address

4 Rimu Street

Phone: 0272993507

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Male

Age: 50-59 years

Ethnicity: NZ European

Other ethnicity: Gonville, Whanganui

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170321-674GS-18JX
Date: Tuesday, 21 March 2017 10:41:07 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170321-674GS-18JX

Attachment: not attached

Title: Mr

Name: Seanoa. Viliamu

E-Mail: seanoa.viliamu@teoranganui.co.nz

Address

57 Campbell street
po box 611
Whanganui 4541

Phone: 0214678780

Organisation: Te Orangannui

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Agree

Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly disagree

Discretionary conditions may apply to club licences (pg. 11): Strongly disagree

Discretionary conditions may apply to special licences (pg. 11): Strongly disagree

Do you have any further comments to make?

In order for us to set an example on how we can protect our community from violence from alcohol abuse, we need to limit the amount of these liquor outlet being given license, especially around school, day care/Kohanga and churches.

Have you submitted to Council before?: No

Gender: Male

Age: 30-39 years

Ethnicity: Pacific Peoples

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170321-6P18I-75C
Date: Tuesday, 21 March 2017 11:25:03 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170321-6P18I-75C

Attachment: not attached

Title: AOD Clinician

Name: Leonie Hetet-Hanara

E-Mail: lhetet-hanara@teoranganui.co.nz

Address

57 Campbell Street,
Whanganui

Phone: 027 467 7086

Organisation: Te Oranganui

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly disagree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly disagree

Discretionary conditions may apply to club licences (pg. 11): Strongly disagree

Discretionary conditions may apply to special licences (pg. 11): Strongly disagree

Do you have any further comments to make?

For the Whanganui region a minimum of 10 including grocery stores should be allowed to sell liquor to the public.

Have you submitted to Council before?: Yes

Gender: Male

Age: 50-59 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170322-53H14-1ADR
Date: Wednesday, 22 March 2017 8:56:10 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170322-53H14-1ADR

Attachment: not attached

Title: Mrs

Name: Barbara

E-Mail: barbaramgray@gmail.com

Address

187 Papaiti Rd
RD 14
Wanganui

Phone: +6463484546

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

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Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Neither agree nor disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Agree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Neither agree nor disagree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: Yes

Gender: Female

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170322-5DM70-18VL
Date: Wednesday, 22 March 2017 9:03:39 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170322-5DM70-18VL

Attachment: not attached

Title: Ms

Name: Ethel

E-Mail: emuir@teoranganui.co.nz

Address

Hurworth place Whanganui

Phone: 0274962513

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

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Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Neither agree nor disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Neither agree nor disagree

Discretionary conditions may apply to club licences (pg. 11): Neither agree nor disagree

Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?

Access for alcohol is far too easy to get hold of. We as a community need to take control of this

situation before it gets out of hand not just for us now but for future generations.

Have you submitted to Council before?: Yes

Gender: Female

Age: 40-49 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170322-5JKHM-FSU
Date: Wednesday, 22 March 2017 9:31:16 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170322-5JKHM-FSU

Attachment: not attached

Title: Mrs

Name: Renee Trillo

E-Mail: renee_trillo@outlook.co.nz

Address

58 Gowers Rd, RD2

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly disagree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly disagree

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Maximum trading hours for restaurants 8am to 12am midnight: Strongly disagree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly disagree

Discretionary conditions may apply to on-licences (pg. 10): Neither agree nor disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Neither agree nor disagree

Discretionary conditions may apply to club licences (pg. 11): Neither agree nor disagree

Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 18-29 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170322-8KJ4U-EI1
Date: Wednesday, 22 March 2017 2:39:57 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170322-8KJ4U-EI1

Attachment: not attached

Title: Mrs

Name: Debbie-Jane Viliamu

E-Mail: djandnoah@vodafone.co.nz

Address

1a Totara Street, Tawhero, Whanganui

Phone: 0274677075

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Disagree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

I strongly agree with the 9pm cut-off for selling alcohol at off-licenses like supermarkets and bottle stores, but I would like to see the trading ours for off licenses restricted to 9am-9pm.

Have you submitted to Council before?: Yes

Gender: Female

Age: 30-39 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170323-97OVL-WRK
Date: Thursday, 23 March 2017 3:48:00 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170323-97OVL-WRK

Attachment: not attached

Title: Ms

Name: Karen Wright

E-Mail: Karen.Wright@wdhb.org.nz

Address
Whanganui 4501

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Neither agree nor disagree

Discretionary conditions may apply to club licences (pg. 11): Disagree

Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170324-5EVUU-18XG
Date: Friday, 24 March 2017 9:09:31 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170324-5EVUU-18XG

Attachment: not attached

Title: Ms

Name: Alaska Dobbs

E-Mail: laskajhenei@gmail.com

Address

11 Gunn St
Gonville

Phone: 02040992888

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Agree

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Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: Yes

Gender: Female

Age: 18-29 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170324-6JV8Z-X2O
Date: Friday, 24 March 2017 11:00:52 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170324-6JV8Z-X2O

Attachment: not attached

Title: Miss

Name: Lee-Arna Nepia

E-Mail: not supplied

Address

6B Wordsworth St, Gonville, Whanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 18-29 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170325-ABVT6-RTB
Date: Saturday, 25 March 2017 5:35:11 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170325-ABVT6-RTB

Attachment: not attached

Title: Mrs

Name: Ruth Hagenaaars

E-Mail: not supplied

Address

60 Waireka Road, Rd14, Wanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: NZ European

Other ethnicity: .Wanganui

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170326-9A0A2-7AU
Date: Sunday, 26 March 2017 3:58:40 p.m.
Attachments: [Alcohol Policy Submission Tasker.docx](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170326-9A0A2-7AU

Attachment: attached

Title: Mr

Name: Patrick Tasker

E-Mail: rotoma19@hotmail.com

Address

448 State Highway 4
Wanganui

Phone: 063456410

Organisation: Avoca Services 2013 Ltd and Myself

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly disagree

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Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): not supplied

Discretionary conditions may apply to on-licences (pg. 10): Strongly disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly disagree

Discretionary conditions may apply to club licences (pg. 11): Strongly disagree

Discretionary conditions may apply to special licences (pg. 11): Strongly disagree

Do you have any further comments to make?

Please refer to my full submission attached. I would like the opportunity to be heard in person please.

Have you submitted to Council before?: Yes

Gender: Male

Age: 50-59 years

Ethnicity: Pacific Peoples

Other ethnicity: not supplied

Wanganui District Council

Draft Alcohol Policy Submission

Written by Pat Tasker

448 State Highway 4

Wanganui

To whom it may concern please find attached my submission. For ease of reading and collation I have made reference to the parts of the draft policy in numerical order and name of the section of the draft policy I wish to comment on.

1. Introduction Section - Policy *Why we need a policy*

There are two comments to be made for consideration

- a. Has the council really considered their options in relation to a local policy? It could be that we are simply guided by the Sale and Supply of Alcohol Act 2012 and although the Act allows for a Policy it does not actually require one to be adopted.

Each application made under the Sale and Supply of Alcohol Act 2012 should be taken on its own merit and a one size fits all policy is not required." Section 4 of the Sale and Supply of Alcohol Act 2012 has the objective; *harm caused by the excessive or inappropriate consumption of alcohol should be minimised.*

What the council is trying to achieve is already being covered by the Central Government.

An adoption of a simple Policy that just defaults to the Sale and Supply of Alcohol Act 2012 would save the Council both time and money. A new policy is also duplicated work that central government have undertaken nationally.

- b. The statement "The purpose of this policy is to minimise alcohol related harm within the district through regulation of matters relating to licenced premises" should be focused on, but in places the draft policy goes off track. This observation is based on the following:
 - i. When reading the Policy, Supermarkets and Grocery Stores are **ringfenced** and do not come within its scope. However, antidotally, supermarkets, are the biggest sellers of beers, ciders and wines in the district. It could be argued they are responsible for the most harm. If there is to be a policy equity should prevail and Supermarkets and Grocery Stores should be included.

I noted that the local alcohol policy research document was silent in relation to volume sales by differing outlets. Could it be the big players with deep pockets are more difficult to bring into line but it is easy to pick the small operator off?

- ii. In places the policy drifts from its core function / scope and becomes a Trojan horse in attempt to control other activities. Examples of this are found in section 5; discretionary conditions; specific number of patrons and noise management plans. These will be commented on later in the submission.

c. Summary of Introduction points to be considered are:

- i. The councils' policy should be a policy that defaults to the Sale and Supply of Alcohol Act 2012 with minimal extra conditions.
- ii. If the Council decide to have a local policy that further legislates or restricts the sale and supply of alcohol in the district **ALL OUTLETS** need to be included. This includes supermarkets.
- iii. If the Council decide to have a local policy the policy should not stray from sale and supply of alcohol matter and trespass matters governed by other acts or policies.

2. Scope of Policy Section

There is no comment offered in the section

3. Policy Context

There is no comment offered in the section

4. Background Issues

- a. The comments in paragraph two¹ of this section are just that, Comments. Comments from the WDHB Medical Officer and Police should carry no more weight than any other citizen.
- b. Contrasting, On and Off-licence closing hours and ED admissions is clouding the facts². Off-Licences should not be included in this statement as no consumption can take place on premises with an Off-Licence. Alcohol is taken away to be consumed at any time. On-Licences should be the only ones considered in this statement
- c. Police statistics are and extremely blunt tool to be using for anything. They are easily manipulated and skewed and do not represent a true position. Where alcohol is available in any community whether it be through one outlet of 100 outlets if Police attend an incident and they believe there is alcohol involved they will record it but often they have no interest or idea when or when the alcohol was purchased.

¹ Paragraph 2, page 6 - Background and issues section

² Bullet point 3, page 7 of draft policy - Background and issues section

- d. 15% of vehicle crashes in the district were alcohol related. This should have nothing to do with this policy and is just a selling point being used. Any policy adopted should not be done so on proper gender trying to sell its benefits. This comment belongs in road safety not in a sale and supply of alcohol policy.

5. Vision and Purpose

There is no comment offered in the section

6. Objectives and Policies – Locations of Licenced premises To Be Considered In Line With Sensitive Locations

- a. In part, some of the rational used in this section is flawed. If exposure of young people to advertising is the concern, all off licences could be made to have the same restrictions on advertising on the outer building as Supermarkets and Grocery stores have, and the inside area designated as a Restricted Area under the Act which will stop young persons from entering the building and being exposed to such horrendous sights.

Currently it is my belief Supermarkets get around area designation by being undesignated. Any policy should include supermarkets and require them to have a restricted area for the sale of alcohol. In this way, the Policy may achieve what it is trying to do on a more equitable basis.

- b. The term close proximity is not defined and is open to interpretation by those considering any application. The policy needs to reflect that this is a consideration only when an objection to an application is received.

There are numerous examples³ in Wanganui of off-licence and on- licence establishments cohabitating in close proximity to sensitive sites for many years without issue. You are not going to stop young people travelling past Liquor outlets. You can reduce external signage in a similar manner to smoking advertising.

- c. When considering the draft policy members may wish to think about the fact there is now a high number of last year students at a secondary school that can legally purchase alcohol. Do they too need protecting?

7. Objectives and Policies – District-wide Limit On Off-licenced Premises

- a. Again, in part some of the rational used in this section is flawed. Supermarkets and Grocery Stores are outside the policy but they still supply to the market need. There is no evidence in the research document that Supermarkets and Grocery stores are less responsible for any harm that may occur, in fact it is more than likely they are a

³ Wanganui Intermedicate School – LiqourLand, Wanganui Girls College – Brews, Wanganui East 4 Square being across the road from a Church and others.

driver of harm due to their cheaper alcohol prices. Supermarkets and Grocery Stores should be dealt with on an equal basis if they wish to have an off-Licence. It is common knowledge within the liquor industry Supermarkets can provide cheaper mainstream alcohol products than those who specialise in the alcohol sale industry due to their bigger buying power and high volumes. It logically follows those who have less income, or who are described as being in the area of concern on the social deprivation index will purchase the cheaper, readily available, alcohol. It is often said the health of a society can be judged on the price of alcohol. The cheaper the alcohol the less healthy the society. Supermarkets certainly provide cheaper bulk alcohol.

It is very common for retailers of alcohol to purchase from a supermarket due to their extremely low prices. This fact alone should indicate supermarket and grocery stores should be within this policy.

- b. The capping of numbers in relation to Off-Licences is draconian in a free society and creates and “valuable item” to those who currently have an Off-Licence by way of unfair regulation. The market force will prevail and not allow too many off-licences to operate. Any business sale of a current off-licence business (if the draft policy remains in its current form) will cause it to be sold at a higher value because of capped numbers. The market will have false controls. It is bringing back protectionism for those who currently have an off-licence and an unfair advantage.
- c. To have a fixed capped number is a soft option for those officials considering any application. It may be appropriate for a body considering an application to consider the number of licences currently in place within the district as one of the planks they use to determine success or failure of any application. Then at least the public will have a robust record of any valid social reason for a decision not just a blanket no more off-licence comment. The policy should reflect this position and not be seen a blunt tool that has no room for reasonableness.
- d. There is no empirical evidence to definitively show that capping numbers of Off-Licences has any effect whatsoever in reducing alcohol harm. ⁴Cameron M, Cochrane W, McNeill K et al claim *some studies have found convincing patterns of increased harm (including violence, car crashes and injuries) with increasing numbers of alcohol outlets. Other studies have not replicated this, and this is likely to be due to local contextual factors such as the levels of socio-economic deprivation, alcohol pricing, and the volume of sales.* The jury is still out on the effect of capping numbers.
- e. Exposing young persons to alcohol advertising by capping the number outlets will not stop their exposure through other advertising mediums such as news paper full page ads and sponsorship. I contend the rationale used in the draft is extremely weak to support capping numbers of outlets.

⁴ Cameron M, Cochrane W, McNeill K et al The impacts of liquor outlets- a review of the international academic literature and New Zealand media reports Population Studies Centre, University of Waikato 2009.

8. A one-way Door Restriction Will Apply - AND – Maximum Trading Hours Will Be Set

- a. **One way door restriction** will have the effect of not allowing any new patron into the premise within one hour of closing. The council don't mind charging full rates on the property where the business is being conducted but seem to be keen to restrict that rate payer from making revenue to pay the rates. The one-way door restriction will reduce the ability to create income and becomes a quasi-early closing time.
- b. In the rationale of this section it is stated that one way door restrictions are designed to stagger migration. The migratory drinker moves from premise to premise when there is different closing times imposed at each premise. A better solution would be to impose a single closing time on all premise such as 1.00am and have everyone on an even playing field
- c. Having different maximum closing times for Clubs, Hotel and Restaurants is ill-advised at best. I would ask what is the real difference (apart from membership etc) between a tavern and a chartered club. I would not hesitate to say virtually nothing. The policy may be simpler and more workable if the hours were set at 8.00am to 1.00am the following day for all on-licences no matter what type. With no one way door policy.
- d. Off-licence hours should be 8.00am to 9.00pm.

9. The District Licencing Committee May Consider Discretionary Conditions

- a. These matters are already written into the substantive Sale and Supply of Alcohol Act and do not need to be included in a Policy for that reason. It is creating bureaucracy for bureaucracy sake.
- b. Is it really necessary to have a Noise Management Plan? Noise is already cover by the Resource Management Act and the Wanganui District Council Noise Control Policy 2009. I do not see the need for another Committee to be considering things that are already well legislated for and where there are local policies in place. This reminds me of the old saying about councils "paralysis by analysis and over planning". It is no more than a feel-good factor and a waste of time for a committee to be considering.
- c. Management Plan for outdoor areas. These areas are covered in the issue of the licence and are licensed premises. I see no further need to have extra plans. The policy does not state what type of outdoor area is needs a plan.
- d. I support the need for a plan where there is an outdoor area not owned by the premise but rented from the Council for outdoor tables. This plan should be put in place at the time of any rental agreement being struck and be submitted as part of

any license application.

- e. Special Licences should require a person with a manager's certificate to be present at all times when a special licence is in force. I see no difference in the responsibilities that goes with the sale of alcohol with a special licence to that of the sale of alcohol by way of a Club or On-licence.
- f. The number of patrons on a premise is already governed by the issue of a Building Warrant of Fitness and calculations submitted at the time of any building consent being issued. I would suggest this aspect of the management of a licenced premises is already well governed. I do not see it as the Licensing Committee business to trespass into areas outside their jurisdiction and already covered by other legislation compliance regimes.

There may however be a case for maximum numbers when issuing of a Special Licence in a venue that is not a regular licenced premises. This should be explored and inserted into the Policy.

10. Monitoring and Evaluation

- a. One way door measurement (if adopted – hopefully it not be) Drunks in Custody is not a real indicator measurement as the Police uplift drunks from all around the city and there is no linkage between the drunk coming from the premises or private non licenced premises.
- b. Maximum Trading Hours – Infringements issued. This is purely related to how hard the Police drive this activity or not drive it. Some police officer will issue a ticket others will not. I have personal knowledge and experience of this and if it is not seen as a Police priority It will not be enforced thereby any stats drawn from it will be incorrect and meaningless.
- c. The difficulty in measuring hospital outcomes is that while there is one place to purchase alcohol in Wanganui there will always be a health indicator pointing to alcohol as a cause. Is it (alcohol) the root cause of the harm, that is often left up to a persons opinion at the time.
- d. In relation to the Police statics it might be better to look at actual call to incidents at or outside licenced premises that directly relate to over consumption of alcohol.

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170327-8NC1R-Q3F
Date: Monday, 27 March 2017 2:53:01 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170327-8NC1R-Q3F

Attachment: not attached

Title: Mrs

Name: Glenda Leitaio

E-Mail: not supplied

Address

43 College St
Whanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170329-5DVT0-1AL4
Date: Wednesday, 29 March 2017 9:05:02 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170329-5DVT0-1AL4

Attachment: not attached

Title: Mrs

Name: Jamie Procter

E-Mail: not supplied

Address

52 Bedford Ave
Gonville
Whanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Disagree

Discretionary conditions may apply to club licences (pg. 11): Disagree

Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 30-39 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170407-835C6-QXL
Date: Friday, 7 April 2017 1:58:44 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170407-835C6-QXL

Attachment: not attached

Title: Mrs

Name: Helen Daly

E-Mail: not supplied

Address

46 Watt Livingstone RD
RD 4
Whanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 40-49 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170412-69YCV-Q2X
Date: Wednesday, 12 April 2017 10:54:28 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170412-69YCV-Q2X

Attachment: not attached

Title: Community Developer

Name: Sharon Duff

E-Mail: sduff@wrhn.org.nz

Address

100 Heads Rd
Whanganui

Phone: 06 3480109

Organisation: Whanganui Regional Health Network

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly disagree

Discretionary conditions may apply to club licences (pg. 11): Strongly disagree

Discretionary conditions may apply to special licences (pg. 11): Strongly disagree

Do you have any further comments to make?

Alcohol related harm extends to every part of our community it effects babies before they are born and it leads to falls in older people. Alcohol should be taxed heavily to recognise that it is a treat product to be consumed on a treat basis and not as a food group or a way of coping because it is neither. Everyone suffers from mental health issues at one time in their life it would be amazing if we had a community that recognised that and supported each other in sadness so we don't have to hit the bottle!

Have you submitted to Council before?: Yes

Gender: Female

Age: over 60 years

Ethnicity: not supplied

Other ethnicity: NZ Irish

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170419-5J4WS-DL5
Date: Wednesday, 19 April 2017 9:29:12 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170419-5J4WS-DL5

Attachment: not attached

Title: Mr.

Name: Darrell Rudolph

E-Mail: darrell.rudolph@wdhb.org.nz

Address

3 Seamer St., Ratana, Whanganui

Phone: 02108482049

Organisation: Relapse Prevention and Recovery Care Group

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

The Relapse Prevention and Recovery Care Group is run through the Whanganui District Health

Board and facilitated by Community Mental Health and Addictions support workers with assistance from Alcohol and Other Drugs (AOD) Clinicians, nurses, social workers and other community support services.

It is a recovery care support group for service users that caters for people from all stages of the continuum of use, from hazardous use through to long standing addictions especially pre and post-rehabilitation. The group goes as far as Raetihi, Ohakune and Taihape to provide support to service users dealing with addictions. Our members also support other groups being run in the community which includes group from Balance Whanganui, Te Oranganui Iwi Health Authority and the rural areas.

In terms of the community, we endeavour to reduce alcohol-related harm and making it a supportive environment not only for younger generations and for people in recovery but also for those contemplating recovery.

The Relapse Prevention Group wishes to promote and support actions that reinforce the object of the Sale and Supply of Alcohol Act (2012) outlined in Section 4. This states that the object of the Act: (a) the sale, supply, and consumption of alcohol should be undertaken safely and responsibly; and (b) the harm caused by the excessive or inappropriate consumption of alcohol should be minimised.

Of special interest to us is reducing the availability and accessibility to alcohol through:

- a district-wide limit on the number of off-licensed premises (with the exclusion of supermarkets and grocery stores)
- rules about the proximity of off-licensed premises to sensitive sites
- a 'one-way' door restriction in effect from one hour prior to license closing hours for all taverns, bars, pubs, and night-clubs
- maximum trading hours for licensed premises

We believe that these are strategies that would reduce alcohol-related harm in our community and help protect our future generation from damage cause by excessive consumption of alcohol.

Have you submitted to Council before?: No

Gender: Male

Age: 50-59 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-5K99U-QWJ
Date: Thursday, 20 April 2017 9:34:34 a.m.
Attachments: [Alcohol Action Whanganui Press release.docx](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-5K99U-QWJ

Attachment: attached

Title: Mr.

Name: Johnston McGuckin

E-Mail: not supplied

Address

28 Marshall Ave., Wanganui East, Whanganui

Phone: 02102369039

Organisation: Alcohol Action New Zealand

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

Alcohol Action New Zealand

This initiative began with a small working group in the field of addiction treatment but soon involved public health experts and a range of other colleagues in various services and organisations who are dealing with the negative impacts of alcohol on a daily basis, and has quickly grown into a broad network of people throughout the country. This includes representatives here in Whanganui (Alcohol Action Whanganui) which liaise with other groups from Palmerston North and Porirua.

The majority of us enjoy drinking alcohol, but all are alarmed about the way alcohol dominates many social situations and the scale of unhealthy and dangerous drinking in contemporary New Zealand – a crisis that enriches the liquor industry while causing immense harm to individuals and society as a whole.

A Once in a Generation Opportunity

New Zealand's alcohol crisis costs us billions each year. This is to say nothing of the human cost.

Getting to grips with the problem starts with recognising:

- Alcohol is a legalised drug and here to stay.
- Alcohol is currently pushed by powerful commercial forces

Like smoking, however, our heavy drinking culture can be dismantled. The World Health Organisation has set out a clear set of policy directives to do this:

- Price: End ultra cheap alcohol, beginning with a minimum price for a standard drink
- Access: End highly normalised access to alcohol, by restoring supermarkets to being alcohol free
- Advertising and Marketing: Ban all alcohol advertising and sponsorship except objective printed info
- Drink Driving: End legal drunk driving by reducing the adult blood alcohol level to at least 0.05.

In recent years over 3000 people wrote a submission to the Law Commission's review of alcohol laws. The Law Commission listened to the evidence and wrote a report calling on the Government to overhaul New Zealand's alcohol laws. Its advice closely follows the World Health Organisation directives.

The Issue

There is a national alcohol crisis. However, this crisis is under-recognized because we have become numbed by the unrelenting presence of alcohol-related problems. The national alcohol crisis has become our way of life.

- At least 25% of New Zealand drinkers are heavy drinkers (Wells et al 2006)
- A third of all police apprehensions involve alcohol (Stevenson 2009)
- Half of serious violent crimes are related to alcohol (Stevenson 2009)
- 60 different medical conditions are caused by heavy drinking (O'Hagan et al 1993)
- Up to 75% of adult presentations at Emergency Departments on Thursday, Friday and Saturday nights are alcohol-related (Quigley personal correspondence)
- Over 300 alcohol-related offences every day (Stevenson 2009)
- Over 500 serious and fatal injury traffic crashes every year (Erasmus 2009)
- At least 600 children born each year with fetal alcohol spectrum disorder (May & Gossage 2001)
- Over 1000 alcohol deaths in New Zealand every year (Connor et al 2005)
- 17,000 years of life per year are lost through alcohol (Connor et al 2005)

But, figures and statistics such as these do not adequately capture the misery, pain and loss that many New Zealand families suffer as a result of excessive alcohol use. However, they go some way in describing the awkward truth – alcohol is causing considerable damage to our society.

What is causing the crisis?

Excessive commercialisation, including aggressive marketing by large multinational liquor companies, is a key driver of the national alcohol crisis in New Zealand. Alcohol is a highly intoxicating, addictive drug that needs to be much more carefully regulated under legislation than ordinary marketable commodities, such as fruit and vegetables (Hawkes 1993). Further, information about alcohol that consumers have the right to know and that the Government would factor into its responses to the national alcohol crisis, is being kept very quiet by the alcohol industry (Bond et al 2009).

Ten things the alcohol industry won't tell you about alcohol

- Alcohol is a highly intoxicating drug which is fairly easy to overdose on (Hilts 1994; Gable 2004; Sellman et al 2009)
- Alcohol can cause brain damage (Neiman 1998; Niccols 2007; Harper 2009)
- Alcohol causes aggression (Parrott & Zeichner 2002; Attwood et al 2009)
- Alcohol is fattening in social drinkers (Yeomans 2004; Nutristrategy 2005; Suter 2005)
- Alcohol can cause cancer (Corrao et al 2004; WHO 1998; WCRF 2007; Fillmore et al 2009)
- Alcohol cardio-protection has been talked up (Corrao et al 2000; Jackson et al 2005)
- The alcohol industry actively markets alcohol to young people (Jackson et al 2000)
- Low risk drinking means drinking low amounts of alcohol (NHMRC 2009)
- A lot of the alcohol industry's profit comes from heavy drinking (Habgood et al 2001; Chikritzhs et al

2003; Foster et al 2003)

- There is a solution to the national alcohol crisis: "The 5+ Solution".

The 5+ Solution

Unfortunately, education campaigns alone and the hope that individuals will spontaneously begin to act with more self-responsibility have not been shown to be effective strategies. Effective regulation is needed to turn the tide of New Zealand's harmful drinking culture. The 5+ Solution is a set of policy directives which are a real solution to the national alcohol crisis:

1. Raise alcohol prices
2. Raise the purchase age
3. Reduce alcohol accessibility
4. Reduce marketing and advertising
5. Increase drink-driving counter-measures

PLUS: Increase treatment opportunities for heavy drinkers

The 5+ Solution is a set of policy directives based on the internationally acclaimed, World Health Organisation sponsored, publication, "Alcohol: No Ordinary Commodity" written by fifteen of the top alcohol and public health scientists in the world (Babor et al 2003). It has recently been further endorsed by a paper in the leading medical journal The Lancet (Anderson et al 2009).

Recommendation

The Alcohol Action Whanganui wishes to support the proposed Local Alcohol Policy. We fully endorse any measures that contribute to a reduction of alcohol-related harm for our own and all other communities especially for the future generations. We support any strategies that reduce alcohol accessibility, marketing and advertising through:

- a district-wide limit on the number of off-licensed premises
- rules about the proximity of off-licensed premises to sensitive sites
- a 'one-way' door restriction in effect from one hour prior to license closing hours for all taverns, bars, pubs, and night-clubs
- maximum trading hours for licensed premises

Have you submitted to Council before?: No

Gender: Male

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

Alcohol consumption contributes to cancer, even in moderate drinkers: Otago study

The University of Otago released the following press report based on Prof Jennie Connor's work on Monday, 27 June 2016.

Drinking alcohol increases the risk of several types of cancer, and was responsible for 236 cancer deaths under 80 years of age in New Zealand in 2012, according to a new study at the University of Otago.

The research, in collaboration with the Global Burden of Disease Alcohol Group, and just published in the international journal *Drug and Alcohol Review*, builds on previous work that identified 30 per cent of all alcohol-attributable deaths in New Zealand to be due to cancer, more than all other chronic diseases combined.

The study uses evidence that alcohol causes some types of cancer after combining dozens of large studies conducted internationally over several decades. The cancers that are known to be causally related to alcohol include two of the most common causes of cancer death in New Zealand, breast and bowel cancer, but also cancer of the mouth, pharynx, oesophagus, larynx and liver. This New Zealand study estimated mortality for 2007 and 2012.

Lead author, Professor Jennie Connor of the Department of Preventive and Social Medicine at Otago Medical School, said the findings about breast cancer were particularly sobering.

"About 60 per cent of all alcohol-attributable cancer deaths in New Zealand women are from breast cancer. We estimated 71 breast cancer deaths in 2007 and 65 in 2012 were due to drinking, and about a third of these were associated with drinking less than two drinks a day on average. Although risk of cancer is much higher in heavy drinkers there are fewer of them, and many alcohol-related breast cancers occur in women who are drinking at levels that are currently considered acceptable," Professor Connor says.

"There was little difference between men and women in the number of cancer deaths due to alcohol, even though men drink much more heavily than women, because breast cancer deaths balanced higher numbers of deaths in men from other cancer types."

She adds: "These premature deaths from cancer resulted in an average 10.4 years of life lost per person affected, with more loss of life among Māori than non-Māori, and for breast cancer compared with other cancers."

"While these alcohol-attributable cancer deaths are only 4.2 per cent of all cancer deaths under 80, what makes them so significant is that we know how to avoid them," explains Professor Connor.

"Individual decisions to reduce alcohol consumption will reduce risk in those people, but reduction in alcohol consumption across the population will bring down the incidence of these cancers much more substantially, and provide many other health benefits as well.

"Our findings strongly support the use of population-level strategies to reduce consumption because, apart from the heaviest drinkers, people likely to develop cancer from their exposure to alcohol cannot be identified, and there is no level of drinking under which an increased risk of cancer can be avoided.

"We hope that better understanding of the relationship of alcohol with cancer will help drinkers accept that the current unrestrained patterns of drinking need to change."

Connor JL, Kydd R, Maclennan B, Shield K, Rehm J. Alcohol-attributable cancer deaths under 80 years of age in New Zealand. Drug and Alcohol Review 2016 DOI: 10.1111/dar.12443

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-64TT4-XVC
Date: Thursday, 20 April 2017 10:30:33 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-64TT4-XVC

Attachment: not attached

Title: Mr

Name: Trevor McMahon

E-Mail: trevormcmahon@hotmail.com

Address

10 Karyn Street
Whanganui

Phone: 0274677105

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

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Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Male

Age: 50-59 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-66L4J-45J
Date: Thursday, 20 April 2017 10:38:52 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-66L4J-45J

Attachment: not attached

Title: Miss

Name: Tanya Tamihana

E-Mail: ttamihana@teoranganui.co.nz

Address

57 Campbell Street
Whanganui

Phone: not supplied

Organisation: Te Oranganui Mental Health & Addiction Service

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: Maori

Other ethnicity: European

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9OM5C-11P8
Date: Thursday, 20 April 2017 4:26:52 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9OM5C-11P8

Attachment: not attached

Title: Mrs

Name: Kim Cripps

E-Mail: dkcripps@farmside.co.nz

Address

641 Waikupa Rd
RD 12
Wanganui

Phone: 027 629 8546

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

Alcohol is over rated.

Have you submitted to Council before?: Yes

Gender: Female

Age: 40-49 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9OZVZ-21K
Date: Thursday, 20 April 2017 4:28:29 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9OZVZ-21K

Attachment: not attached

Title: Ms

Name: Rae Barlow

E-Mail: rae1974barlow@gmail.com

Address

33 Fromont St
Whanganui

Phone: 027 4956922

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 40-49 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9PHBS-FVK
Date: Thursday, 20 April 2017 4:30:57 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9PHBS-FVK

Attachment: not attached

Title: Ms

Name: D McMenamin

E-Mail: not supplied

Address
39 Patterson Street

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

There needs to be social investment to create different solutions to changing the culture of how

people drink. Especially alternative activities need to be invested in to support our young people to make better choices around alcohol and to have alternatives.

Have you submitted to Council before?: No

Gender: not supplied

Age: not supplied

Ethnicity: not supplied

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9PWOT-1920
Date: Thursday, 20 April 2017 4:32:54 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9PWOT-1920

Attachment: not attached

Title: Ms

Name: Joanna Ginn

E-Mail: JoannaGinn@xtra.co.nz

Address

19 Toi Street
Tawhero
Wanganui

Phone: 06 3445255 or 0278001215

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9Q9QH-PI7
Date: Thursday, 20 April 2017 4:34:25 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9Q9QH-PI7

Attachment: not attached

Title: Miss

Name: Kaya Miller

E-Mail: k.j.Miller@yahoo.com

Address

10a Talbot Street
Wanganui East

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 18-29 years

Ethnicity: not supplied

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9QX80-12LC
Date: Thursday, 20 April 2017 4:37:30 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9QX80-12LC

Attachment: not attached

Title: Mr

Name: Philip Wilkinson

E-Mail: PhilKay@slingshot.co.nz

Address

79 Raine St
Whanganui

Phone: 3433367

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

I grew up under 6pm closing.
I would like to see that return.

Have you submitted to Council before?: No

Gender: Male

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9RK93-6E2
Date: Thursday, 20 April 2017 4:40:27 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9RK93-6E2

Attachment: not attached

Title: Mrs

Name: Kristine Penaflor

E-Mail: Kristinedcnz@yahoo.com

Address

29A Carlton Avenue
Gonville
Wanganui

Phone: 02040948567

Organisation: Wanganui Filipino Catholic Community

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 30-39 years

Ethnicity: Asian

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9RUBQ-3EE
Date: Thursday, 20 April 2017 4:41:56 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9RUBQ-3EE

Attachment: not attached

Title: Mr

Name: Peter Jamieson

E-Mail: peterjamieson@xtra.co.nz

Address

23 Brougham Place
Springvale
Whanganui

Phone: 06 3450991

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Male

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9S8U1-1DUJ
Date: Thursday, 20 April 2017 4:43:44 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9S8U1-1DUJ

Attachment: not attached

Title: Ms

Name: Hannah Williams

E-Mail: williamshannah12@yahoo.com

Address

152 Anzac Parade
Wanganui East

Phone: 3436356

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 30-39 years

Ethnicity: not supplied

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9TRCH-R6U
Date: Thursday, 20 April 2017 4:50:52 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9TRCH-R6U

Attachment: not attached

Title: Mr

Name: Basil Mosan

E-Mail: not supplied

Address

79 Purnell St
Whanganui

Phone: not supplied

Organisation: Balance

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Male

Age: 40-49 years

Ethnicity: not supplied

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9UE36-60T
Date: Thursday, 20 April 2017 4:53:45 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9UE36-60T

Attachment: not attached

Title: Ms

Name: Shannette Hirst

E-Mail: not supplied

Address

24A Fox Rd
Whanganui

Phone: 022 302 3084

Organisation: myself + Balance

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

Blow in the bag device for all cars - shows alcohol car won't start!

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9US98-168T
Date: Thursday, 20 April 2017 4:55:29 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9US98-168T

Attachment: not attached

Title: Ms

Name: Sarah Brierley

E-Mail: brierley_Sarah@hotmail.com

Address

44 Montgomery Rd
Wanganui

Phone: 06 3477458

Organisation: Balance Aotearoa (Volunteer worker)

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: not supplied

Other ethnicity: British

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-9VDSY-D8M
Date: Thursday, 20 April 2017 4:58:08 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-9VDSY-D8M

Attachment: not attached

Title: Mr

Name: Rocky Alexander

E-Mail: rockalxander1977@gmail.com

Address

N/A

Phone: 027 8640707

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

I support Balance Aotearoa submission.

Have you submitted to Council before?: Yes

Gender: Male

Age: 40-49 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170420-A4EH6-C20
Date: Thursday, 20 April 2017 5:00:16 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170420-A4EH6-C20

Attachment: not attached

Title: Mr

Name: James Steven Allen

E-Mail: J.L.N@hotmail.co.nz

Address

24A Fox Road
Springvale
Whanganui

Phone: 0284102576

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): not supplied

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Male

Age: 40-49 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170421-52X42-H9V
Date: Friday, 21 April 2017 8:53:49 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170421-52X42-H9V

Attachment: not attached

Title: Mr

Name: Paul Ross

E-Mail: dogwhisperer1964@gmail.com

Address

36 Ikitara Rd
Whanganui

Phone: 022 3103704

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

I feel 16 off license outlets in Whanganui is too many. I also support the submission from Balance Whanganui.

Have you submitted to Council before?: No

Gender: Male

Age: 50-59 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170421-53CXW-8FA
Date: Friday, 21 April 2017 8:55:54 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170421-53CXW-8FA

Attachment: not attached

Title: Mrs

Name: Dianne Kerr

E-Mail: acde.kerr@xtra.co.nz

Address

10 Smart Tce

Phone: 8981

Organisation: WDHB

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly disagree

Discretionary conditions may apply to club licences (pg. 11): Disagree

Discretionary conditions may apply to special licences (pg. 11): Disagree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170421-53ZM9-BGU
Date: Friday, 21 April 2017 8:58:49 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170421-53ZM9-BGU

Attachment: not attached

Title: Mrs

Name: Irene O'Regan

E-Mail: irene.oregan@xtra.co.nz

Address

N/A

Phone: 021 622 055

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Neither agree nor disagree

Discretionary conditions may apply to club licences (pg. 11): Neither agree nor disagree

Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170421-5CYCE-AN7
Date: Friday, 21 April 2017 9:00:33 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170421-5CYCE-AN7

Attachment: not attached

Title: Ms

Name: Bronwyn Bullock

E-Mail: not supplied

Address

6A Rodney Street
Durie Hill
Wanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Neither agree nor disagree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Neither agree nor disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Disagree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170501-4S6W2-12YB
Date: Monday, 1 May 2017 8:03:42 a.m.
Attachments: [David.pdf](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170501-4S6W2-12YB

Attachment: attached

Title: Mr.

Name: David Mason

E-Mail: david@balancewhanganui.org.nz

Address

60 Ridgeway St., Community House, Whanganui

Phone: 06 345 4488

Organisation: Balance Aotearoa

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): not supplied

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): not supplied

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

Balance Aotearoa (previously Balance Whanganui) is a non-governmental mental health peer support agency providing peer support, education and advocacy to people with mental health and/or addiction issue seeking wellness and recovery.

We believe people living with mental health challenges are not their diagnoses and are people with strengths, experiences and abilities enabling them to pursue and maintain wellness in their life.

Our way of supporting Tangata Whaiora (those seeking wellbeing) is by providing:

- peer workers being who they are provide role models in hope and provide recovery education in strength-based approaches to mental health and addiction issues and life struggles.
- a wide range of weekly groups, including Alcohol and Other Drugs (AOD) group, and activities aiding holistic wellbeing.

Balance is a support group for people who experience mental illness and/or Addiction. We meet to help each other to become well and stay well through information, and support.

Our purpose is to offer choices about rights, needs and, over time, to help work out client's own solutions to problems.

Everyone at Balance has been affected in some way with Mental Health and/or Addiction Issues

- social connection.
- one-on-one support.
- advocacy.

Recommendation

The Balance Aotearoa wishes to support the proposed Local Alcohol Policy. We fully endorse any measures that contribute to a reduction of alcohol-related harm to our community.

We support any strategies that reduce alcohol accessibility, marketing and advertising through:

- a district-wide limit on the number of off-licensed premises
- rules about the proximity of off-licensed premises to sensitive sites
- a 'one-way' door restriction in effect from one hour prior to license closing hours for all taverns, bars, pubs, and night-clubs
- limit to the maximum trading hours for both off/on-licensed premises

Have you submitted to Council before?: No

Gender: Male

Age: 40-49 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170501-9MTQC-7FX
Date: Monday, 1 May 2017 4:18:25 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170501-9MTQC-7FX

Attachment: not attached

Title: Ms

Name: Ihapera Rahera Te Wake

E-Mail: itewakertlb@gmail.com

Address

174 Ingestre Street
Whanganui 4500

Phone: 022 1001772

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: over 60 years

Ethnicity: Maori

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170501-9NIXJ-MZV
Date: Monday, 1 May 2017 4:21:46 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170501-9NIXJ-MZV

Attachment: not attached

Title: Mrs

Name: Morgan - (Claudette)

E-Mail: not supplied

Address

87 Karaka St
Castlecliff Beach
Wanganui 4501

Phone: 06 344 7792

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

I think that supermarkets, groceries, dairies should NOT be allowed to sell alcohol.

Have you submitted to Council before?: No

Gender: Female

Age: over 60 years

Ethnicity: not supplied

Other ethnicity: English

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170501-9NZJT-JSS
Date: Monday, 1 May 2017 4:24:07 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170501-9NZJT-JSS

Attachment: not attached

Title: Ms

Name: Carol O'Connell

E-Mail: oconnell.carol27@gmail

Address

85a Karaka Street
Castlecliff Beach
Wanganui 45010

Phone: 022 0315867

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170508-514R0-1AX3
Date: Monday, 8 May 2017 8:45:18 a.m.
Attachments: [Local Alcohol Policy Submission May 2017.pdf](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170508-514R0-1AX3

Attachment: attached

Title: Mrs

Name: Amanda Gibbons

E-Mail: amanda@mainstreetwanganui.co.nz

Address

Mainstreet Whanganui Inc
36 Ridgway Street
Whanganui

Phone: 0272226691

Organisation: Mainstreet Wanganui

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

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Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

Please see attached letter.

Have you submitted to Council before?: Yes

Gender: Female

Age: 30-39 years

Ethnicity: NZ European

Other ethnicity: Wanganui - Wanganui

36 Ridgway Street
PO Box 373, Wanganui
Ph 06 348 0157
Fax 06 348 0159
amanda@mainstreetwanganui.co.nz
www.mainstreetwhanganui.co.nz



Monday 01 May 2017

Wanganui District Council
101 Guyton Street
Wanganui 4540

Re: Wanganui District Council Draft Local Alcohol Policy

Tena Koe,

This submission is made on behalf of Mainstreet Wanganui Inc (Mainstreet) and has been prepared by The Mainstreet Executive represented by Peter Robinson, Interim Chair and Amanda Gibbons, General Manager.

This organisation represents all businesses located within the Central Business District (CBD) of Wanganui and property owners.
We also have a wider community interest in maintaining a safe and attractive Town Centre.

This organisation currently manages maintenance in the Wanganui CBD A and CBD B precinct, via a standing Service Level Agreement with Wanganui District Council.

Item referred to in this submission is:

1. We support Option 2 – Adopt draft LAP as a PLAP to minimise alcohol related harm

As Mainstreet Whanganui staff are often the first on the street in the morning starting as early as 3am, the alcohol related incidents are evident and we are usually the first to witness the aftermath of them.

It is not unusual for staff to come across bodily fluids on the footpaths and damage to both Mainstreet Whanganui and council assets on a weekly basis. The most recent case was irreplaceable damage to twelve hanging baskets and a garden in the Town Centre. This resulted in the arrest of two culprits however only receiving reparation for 30% of the total cost of replacement.

Our members also have had incidents where there has been considerable damage to their businesses, buildings and property from late night alcohol related anti-social behaviour.

As Managers of the area with the largest amount of licensed food & hospitality outlets, we feel that any effort to reduce the alcohol related incidents within the Town Centre is a positive step in the right direction and makes for a safer nightlife.

We thank you for your consideration.

Yours sincerely

Peter Robinson
Interim Chair

Amanda Gibbons
General Manager



Wanganui Cosmopolitan Club Inc.

13 Ridgway St
New Zealand
Phone : (06) 3490149
Email: cossieclub@gmail.com

Whanganui District Council

P O Box 637

Wanganui 4540

Submission for Draft Local Alcohol Policy

- We acknowledge that the availability of Alcohol has associated harm in the community that should be managed. This is the object of the Sale and Supply of Alcohol Act 2012.
- The act allows for the Council to adopt a LAP, and there may be some situations where this is an advantage to minimise harm in our local community.
- Any proposals adopted into the LAP should be based on evidence that they will address problem areas. There seems little evidence that requiring clubs to close at 12 midnight while other establishments can continue to trade until later, will address the problem areas identified.
- Our Chartered Club sells alcohol, and deals with the same problems and requirements as any other licensed establishment. Therefore we believe we should be treated the same, particularly as regards to licensed hours. (the proposal expects clubs to finish trade at 12 midnight while many other outlets trading under an on licence can trade until 2am).
- We are not seeking to extend our licensed hours, just to maintain the hours we currently have.

- Our club provides many social and sporting and club events for our members and guests. Some of these extend to after 12midnight on occasions and being able to serve alcohol responsibly compliments these activities and adds to the enjoyment of many of the participants.

Jen Barber

Secretary/Manager



Nancye Thomson

President



On behalf of the Wanganui Cosmopolitan Clubs 1250 Members



WANGANUI EAST CLUB INC

PO Box 4155

WANGANUI 4541

Phone: (06) 3437023

email: wanganuieastclub@xtra.co.nz

Trax Restaurant

101 Wakefield Street

WANGANUI 4500

Fax: (06) 343 2376

12th May 2017.

Whanganui District Council
101 Guyton Street
Whanganui

Submission to Draft Local Alcohol Policy 2017.

The Wanganui East Club is located at 101 Wakefield Street, Wanganui. It operates as a chartered club and holds a club licence and off licence. The club has around 2200 members.

Our primary concerns regarding the proposed LAP relates to the reduction hours for our club licence to 12 midnight from the current 1am.

- We acknowledge that the availability of Alcohol has associated harm in the community that should be managed. This is the object of the Sale and Supply of Alcohol Act 2012. We take our responsibilities around this matter seriously.
- The act allows for the Council to adopt a LAP, and there may be some situations where this is an advantage to minimise harm in our local community. We support this where evidence clearly shows proposed changes will have a positive affect.
- Any proposals adopted into the LAP should be based on evidence that they will address problem areas. There seems little evidence that requiring clubs to close at 12 midnight while other establishments can continue to trade until later, will address the problem areas identified.
- Our Chartered Club sells alcohol, and deals with the same problems and requirements as any other licensed establishment. Therefore we believe we should be treated the same, particularly as regards to licensed hours.

(the proposal expects clubs to finish trade at 12 midnight while many other outlets trading under an on licence can trade until 2am).

- We are not seeking to extend our licensed hours, just to maintain the hours we currently have.
- Our club provides many social and sporting and club events for our members and guests. Some of these extend to after 12midnight on occasions and being able to serve alcohol responsibly compliments these activities and ads to the enjoyment of many of the participants.
- Although we do not look forward to having our off licence hours reduced, we ask only that any chances to off licence hours are made based on evidence that the change will reduce harm and that we are treated the same as other off licence holders (i.e. clubs are not allocated reduced hours compared to other outlets).

We would like to speak to our submission at the hearing.

Our contact person is Allan Wakeling. (secretary/Manager), and contact details are email. wanganuieastclub@xtra.co.nz or phone 021 106 9389.

Many thanks

Allan Wakeling
Manger, Wanganui East Club

SUBMISSION TO THE WHANGANUI DISTRICT COUNCIL
ON THE WHANGANUI DRAFT LOCAL ALCOHOL POLICY

15 MAY 2017



PROGRESSIVE

Progressive Enterprises Ltd
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New Zealand

By email: policysubmissions@whanganui.govt.nz
(Subject line – *Proposed Local Alcohol Policy – Submission*)

From: Progressive Enterprises Limited
Private Bag 93306
Otahuhu
Auckland 2024

Contact Person: Paul Radich
Phone: (09) 255 3070
Email: paul.radich@countdown.co.nz

Paul Radich
Alcohol Responsibility Manager, Corporate Affairs
Progressive Enterprises Limited

Progressive Enterprises wishes to appear before the Whanganui District Council ("**Council**") to present this submission.

1. KEY POINTS

Introduction

- 1.1 Progressive Enterprises supports the purpose and object of the Sale and Supply of Alcohol Act 2012 ("**the Act**") and we are committed to selling beer, wine and cider in a responsible and safe manner. We believe that the Whanganui Draft Local Alcohol Policy ("**Draft LAP**") is, for the most part, a sensible response to the challenges faced in Whanganui.

Licensed hours

- 1.2 Whilst we support the application of the Act's national default off-licence hours (ie 7am to 11pm) we would not oppose a 10pm off-licence hour restriction in the Whanganui district. We do however oppose the proposed 9pm hour restriction.

2. PROGRESSIVE ENTERPRISES

- 2.1 Progressive Enterprises is one of New Zealand's leading supermarket operators and currently operates over 180 Countdown supermarkets across New Zealand. It is also the franchisor of the SuperValue and FreshChoice brands in New Zealand, which represents a further 55+ stores, independently operated by local franchisees. Some of the SuperValue and FreshChoice stores are small supermarkets and are categorised under the Act as grocery stores. We include them when we refer to supermarkets in this submission.
- 2.2 We are a retail investor and employer in the Whanganui area, and play an active part in the communities we work and live in. In the Whanganui district, we operate two Countdown supermarkets and one SuperValue grocery store which are:
- (a) Countdown Victoria Ave, which usually trades between 6am and midnight and has current licensed hours of 7am to 11pm;
 - (b) Countdown Whanganui, which usually trades and has current licensed hours between 7am and 10pm; and
 - (c) SuperValue Whanganui, which usually trades and has current licensed hours between 7am and 8pm.
- 2.3 We understand and agree that drinking alcohol has the potential to cause serious harm¹ particularly if people drink alcohol excessively or inappropriately. To address this potential harm the Act sets in place a default national licensing approach and also allows councils to tackle local issues, supported by evidence of actual alcohol related harm ("**ARH**") in the local community.
- 2.4 Reducing ARH caused by the excessive and inappropriate consumption of alcohol needs action from all parts of the community. As a retailer, we have a role to play together with other off-licensees, on-licensees, regulatory agencies and consumers. We are committed to ensuring that all our stores sell and supply alcohol (beer, wine and cider) in a safe and responsible manner and have written policies to ensure this (see **Appendix 1** for more details). We support efficient, effective and reasonable initiatives that minimise ARH and we are proud to have a number of policies and processes in our stores which go beyond minimum measures prescribed by legislation.
- 2.5 By law, supermarkets sell beer, wine and cider only. We appreciate that a licence to do so is not a right, but a privilege, and we work very hard to maintain that privilege. With 2.5 million customers across the country each week, Progressive Enterprises is nationally recognised as a good operator within the licensing industry. Our ID 25 policies are over and above that required by the law and through our business practices, we strive to achieve best practice in the way that we promote and sell beer, wine or cider.

¹ Law Commission Report, Alcohol in Our Lives at chapter 2.

3. A BALANCED PURPOSE

- 3.1 The Act reflects significant (but not all) aspects of the Law Commission's 2010 Report, *Alcohol in our Lives: Curbing the Harm*.² It is correct to say that the 2012 Act has an increased focus on curbing the harm caused by abuse of alcohol consumption. However it is important to note that the Commission's report, and Parliament's Act, recognise that a balance must be struck between the social freedom to purchase and consume alcohol and the minimisation of social harm from its excessive use.³
- 3.2 In particular, the continued association between alcohol and food retailing was expressly approved by the Law Commission as "valid as part of an overall strategy to foster a more responsible and moderate drinking culture".⁴ The Act recognises that, to achieve this outcome, supermarkets should be allowed to continue selling beer, wine and cider. .
- 3.3 The purpose of the Act reflects the need for a balanced approach to enabling the purchase of alcohol for responsible consumption and minimising the effects of its abuse, for the benefit of the community as a whole. Section 3, the purpose clause of the Act, states:

(1) *The purpose of Parts 1 to 3 and the schedules of this Act is, for the benefit of the community as a whole,—*

(a) *to put in place a new system of control over the sale and supply of alcohol, with the characteristics stated in subsection (2); and*

(b) *to reform more generally the law relating to the sale, supply, and consumption of alcohol so that its effect and administration help to achieve the object of this Act.*

(2) *The characteristics of the new system are that—*

(a) *it is reasonable; and*

(b) *its administration helps to achieve the object of this Act.*

- 3.4 This purpose of the Act recognises both that the controls over the sale and supply of alcohol must be reasonable and the desire to attain the object of the Act in section 4, which itself reflects a balance between sale and supply of alcohol and minimisation of the harm it can cause. It recognises that there are limits to what it sets out to achieve and that a balance is to be struck. Furthermore, it is clear that the Act is not intended to address all facets of alcohol consumption. For example, Parliament has separately improved the powers of councils to impose liquor ban bylaws through Local Government (Alcohol Reform) Amendment Act 2012.
- 3.5 The purpose of the Act in section 3 is directly linked to its object, stated in section 4. This is important for the appeal provision for LAPs. Section 4 states:

(1) *The object of this Act is that—*

(a) *the sale, supply, and consumption of alcohol should be undertaken safely and responsibly; and*

(b) *the harm caused by the excessive or inappropriate consumption of alcohol should be minimised.*

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

² Law Commission Report, *Alcohol in Our Lives: Reducing the Harm* (NZLC R114, 2010).

³ At chapter 4.

⁴ At para 8.38. See paras 8.30-8.41.

- (a) *any crime, damage, death, disease, disorderly behaviour, illness, or injury, directly or indirectly caused, or directly or indirectly contributed to, by the excessive or inappropriate consumption of alcohol; and*
 - (b) *any harm to society generally or the community, directly or indirectly caused, or directly or indirectly contributed to, by any crime, damage, death, disease, disorderly behaviour, illness, or injury of a kind described in paragraph (a).*
- 3.6 The two separate elements set out in subsection 4(1) recognise and distinguish between the legitimate sale, supply and consumption of alcohol and the minimisation of harm caused by its excessive or inappropriate consumption. Section 4 recognises that:
 - (a) The sale, supply and consumption of alcohol is to be undertaken safely and responsibly, but is not intended to be minimised *per se*;
 - (b) Only “excessive or inappropriate” consumption of alcohol is of concern;
 - (c) Only that excessive or inappropriate consumption that results in “harm” (as elaborated in subs (2)) is of concern; and
 - (d) Such harm can only be “minimised”.
- 3.7 The object of the Act may be contrasted with the object of the Sale of Liquor Act 1989 (section 4) which was:
 - (1) *The object of this Act is to establish a reasonable system of control over the sale and supply of liquor to the public with the aim of contributing to the reduction of liquor abuse, so far as that can be achieved by legislative means.*
- 3.8 While there has been an ostensibly significant change in the focus of the Act, the Authority has held⁵ that the Court of Appeal’s observations in *Meads Brothers Ltd v Rotorua District Licensing Agency* remain applicable, viz.:⁶
 - “The stated object envisages that the licensing system should be reasonable. This indicates the intention that the controls that are imposed under it should be neither excessive nor oppressive. The object also reflects a legislative perception that controls provided by the licensing system have the capacity to contribute to the reduction of abuse of alcohol in the community but that there are limits to that limited capacity. Section 4 also requires the agencies involved in the Act’s administration, as well as the Courts on appeal from their decisions, to exercise their powers to promote the object.”*
- 3.9 The object of the Act cannot be read in a vacuum. It must be read in the context of an Act which has a balanced purpose, in enabling the controlled sale and supply of alcohol and imposing the controls in a reasonable manner, in order to attain a precisely specified object.
- 3.10 The primary obligation on licensees is to undertake their activities (promotions, sales and supply) safely and responsibly. It is not all forms of harm which the Act seeks to minimise. The object is focussed on a specific type of harm that results from excessive or inappropriate consumption of alcohol. Minimisation of that harm must be considered in light of an Act which has the function of enabling the controlled sale and supply of alcohol for the benefit of the community as a whole.⁷ So when considering whether an element of

⁵ *New Zealand Police v Absolute Caterers Ltd* [2013] NZARLA 946 at [12].

⁶ *Meads Brothers Ltd v Rotorua District Licensing Agency* [2001] NZCA 386; [2002] NZAR 308 at [23].

⁷ Section 3(1) of the Act.

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a LAP is “unreasonable in light of the object of the Act” it is not possible to assess the appropriateness of outcomes against a hypothetical world in which alcohol is not sold.

4. THE LOCAL GOVERNMENT ACT 2002

- 4.1 The policy assessment process is set out in sections 76 - 81 of the Local Government Act 2002 (“LGA”).
- 4.2 The LGA provides a common-sense and straightforward decision-making framework that can be adjusted to reflect the significance of the decision being made.
- 4.3 In making its policy decisions, Council must:⁸
 - (a) Set an objective that is to be achieved;
 - (b) Identify options to achieve those objectives;
 - (c) Assess those options in terms of their advantages and disadvantages.
- 4.4 This process must be conducted having regard to other aspects of the LGA that also influence decisions, including:
 - (a) The purpose of local government set out in section 10 of the LGA which includes the obligation to promote good quality regulations, i.e. those which are efficient, effective and appropriate to present and anticipated future circumstances.⁹
 - (b) The principles of local government set out at section 14 of the LGA, which include the directive to conduct business in an open, transparent, and democratically accountable manner.
- 4.5 In other words, the elements of a LAP must be efficient and effective controls over the sale of alcohol in order to be valid. They should also be catered to the local context, take into account a wide variety of views, and consider cost-effectiveness for businesses. To make these sorts of decisions it is critical to have a sound evidence base.

5. OFF-LICENCE HOURS

- 5.1 Under the Draft LAP the proposed maximum licensed hours for off-licence premises is 7am to 9pm, Monday to Sunday. We cannot see local evidence to support an evening restriction for supermarket off-licence hours, therefore Progressive Enterprises opposes this policy in relation to the evening licensed hours to the extent that it applies to supermarket and grocery store off-licences.
- 5.2 Progressive Enterprises opposes the 9pm evening restriction for off-licences for the following reasons:
 - (a) The LAP suggests that evening hours should be restricted because alcohol-related Emergency Department (“ED”) presentations occur in conjunction with the availability of alcohol and the closing times of on and off-licence outlets.¹⁰ However, the Local Alcohol Policy Research Report dated 8 November 2016 (“the Research Report”) draws this conclusion based on data which assesses admissions by day of the week and over long 6 hour intervals. Although the chart shows that these admissions are higher at night time (between 5pm and 5am), the data is presented in a way which makes it impossible to identify whether these admissions are connected to the closing time of most supermarkets and grocery stores. We consider that this information has not been presented in a way which supports a response of restricted off-licence hours.

⁸ Section 77(1)(a) and (b) LGA.

⁹ Sections 13 and 76 LGA.

¹⁰ At page 7.

- (b) We are concerned that the Council has relied on a concept described as the “availability theory” as part of its basis for restricting off-licence hours. The Council is therefore relying on a general concept without an analysis of the specific impact that it will have on ARH in the Whanganui, which is of significant concern to us. This is demonstrated by several overly broad assumptions attempting to connect ARH and licenced hours in the Research Report. These assumptions also fail to distinguish between off or on-licenced closing times. For example:
- (i) The Research Report assumes that because a larger volume of alcohol is sold by off-licences in NZ, and because alcohol is sold at a lower price than via on-licences, that pre-loading is a ‘significant feature of local drinking patterns’.¹¹
 - (ii) The Research Report concludes that ARH closely mirrors the closing hours of off-licenced premises on the basis of CCTV footage from 24 nights in summertime from 23:00hrs onwards.¹² There is no indication in the data of whether the alcohol which led to the ARH was purchased at on- or off-licenced premises. In particular, we note that 2 of Progressive Enterprises 3 stores in the Whanganui area close at 22hrs or before meaning that the events referred to are unlikely to be associated with alcohol sales at Progressive’s supermarkets.
 - (iii) The Research Report states that alcohol-related ED presentations between 19:00 to 23:59hrs on Friday relates to the accessibility of alcohol provided by current operating times of on and off-licenced outlets. This statistic is not a good grounds to restrict sales across the week to 9pm
- (c) Information contained in the Research Report does not otherwise justify a restriction on off-licence evening hours. Specifically:
- (i) The Research Report recognises the statistically insignificant relationship between supermarket and grocery store density and violent offences in Whanganui.¹³
 - (ii) The Research Report acknowledges that Whanganui residents consider there is the right number of off-licence outlets.¹⁴
- (d) There is no other evidence in the LAP or the Research Report to support an evening restriction on hours for supermarkets and grocery stores.
- (e) Recent studies have concluded that restricting off-licence hours will not achieve a statistically significant reduction in ARH. In particular:
- (i) A recent study on the effectiveness of restricting trading hours in New Zealand found that reducing off-licence hours (including grocery stores and supermarkets) had “no impact” on ARH.¹⁵
 - (ii) A recent American study found that changes in off-licence hours did not correlate a statistically significant way with alcohol consumption.¹⁶
 - (iii) The recent paper released by the New South Wales Bureau of Crime Statistics

¹¹ At page 50.

¹² At page 54 and 55.

¹³ At page 71.

¹⁴ At page 13.

¹⁵ Huckle T, Mavoa S, Parker K, & Donovan P. (2016). Effects of restricting trading hours for on-premise and take-away alcohol outlets in New Zealand. Paper presented at the 42nd annual alcohol epidemiology symposium of the Kettil Bruun society, 30 May – 3 June, Stockholm, Sweden.

¹⁶ B. Douglas Bernheim, Jonathan Meer, and Neva K. Navarro. “Do consumers exploit commitment opportunities? Evidence from natural experiments involving liquor consumption” (November 2016) American Economic Journal: Economic Policy 41.

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and Research titled *The Effect Of Lockout And Last Drinks Laws On Non-Domestic Assaults In Sydney: An Update To September 2016* shows that restricting off-license alcohol sales had a nil effect and potentially led to an increase in ARH. The introduction to the paper explains that the ban on take away sales after 10pm across New South Wales was the only restriction imposed across the whole of the State of New South Wales. On page 1, it says:

"Most of these changes targeted licensed premises in the King's Cross and Sydney CBD Entertainment precincts, after a number of high-profile deaths and injuries had occurred at licensed venues and these locations in the months preceding the reforms. The only exception was reduced take away alcohol sales; a reform which is applicable across the State."

Table 1 on page 6 shows that for the rest of New South Wales (where only the restriction on off-licence hours were in place) the level of change was not identified and that the trend of change in non-domestic assaults was an increase of 7.252 which was statistically significant with the P value of 0.43. This result contrasts with the effect of restrictions imposed in Sydney CBD and King's Cross (imposed on hotels, clubs, night clubs and karaoke bars and known individual "trouble-makers"), which resulted in a -11.994 trend change with the P value of <0.01. In response to this report, the State of New South Wales has moved to increase off-licence hours from 10pm back to 11pm.

- 5.3 A LAP sets maximum hours for licensed premises, but within this, councils still have the power and ability to approve hours on a case by case basis, as they do currently. Some supermarkets and grocery stores currently do, and could continue to have, different maximum licensed hours to bottle stores. Notably:
- (a) Councils are able to make fine-grained distinctions between different types of alcohol licences in their LAP;
 - (b) Current case law supports differential hours between supermarkets and bottle stores;¹⁷
 - (c) Supermarkets fulfil different customer needs to bottle stores; and
 - (d) Supermarkets have different customer trends to other licensed premises.
- 5.4 Trading hours for supermarkets have changed over the years to reflect the changing nature of the average New Zealand household, where both parents frequently work and activities are factored around a longer day. We believe these changes were reflected by Parliament in setting the current national maximum licence hours for supermarket alcohol sales from 7am to 11pm, and we support that decision even though we would not oppose a 10pm restriction in the Whanganui district.
- 5.5 To deliver high quality regulation as required by the LGA, LAPs need to promote a decision-making framework that is integrated with the RMA's district plan and resource consenting process as well as the building consent process and we seek some amendments to the Draft LAP to reflect this.
- 5.6 It is also important that the Council consider the following:
- (a) The purpose and object of the Act;
 - (b) The need for persuasive evidence;
 - (c) What matters are relevant considerations and those that are not;

¹⁷ See *Russell Nieper Limited* (LLA decision 1116/93).

- (d) The requirement not to act for trade competition purposes; and
- (e) The obligation to minimise to the extent possible any interference with the objectives of other statutory instruments, including, the Commerce Act 1986, which seeks to promote competition in markets.

- 5.7 In our view, off-licence hours until 10pm are appropriate for supermarkets because there is no evidence to suggest that the Act's national default off-licence hours will be ineffective in addressing alcohol-related harm, particularly as they still allow local authorities to control licensing hours on a case by case basis.
- 5.8 As highlighted, Progressive Enterprises does not oppose the proposed closing hour restriction for off-licences (10pm) in the Whanganui District. However, we do oppose the proposed 9pm restriction for off-licence hours. Having reviewed the Research Report and LAP, there is nothing in the documents to appropriately justify the Council's rationale for imposing an additional restriction on supermarket off-licence hours.

6. REQUEST FOR INFORMATION

- 6.1 In light of the requirements of the LGA and purpose of the Act, we consider that more detailed information from the Police, MoH and Council is required to support the supposition that restricted hours for grocery stores and supermarkets would appropriately address ARH in Whanganui. The specific information sought in this regard is set out in **Appendix 2**. Without this information, we consider that the evidential basis to support an evening restriction on the sale of alcohol has not been established.

7. RECOMMENDATIONS

- 7.1 Progressive Enterprises seeks that the Draft LAP provisions in relation to maximum trading hours for supermarket and grocery store off-licences should be 7am – 10pm (Policy 4 of the Draft LAP).

APPENDIX 1: PROGRESSIVE ENTERPRISES AS A RESPONSIBLE OPERATOR

1. Progressive Enterprises has a Liquor Policy and we also have in-store communications which address the sale of beer ,wine and cider in our supermarkets.
2. Our policy makes it clear that intoxicated persons are not permitted to enter or remain on the premises. Observing customers tends to be easier in a supermarket environment owing to the fact that it is brightly lit and there is individual interaction at the check-out. This is supported by the extremely small number of off-licence breaches which occur in our supermarkets across New Zealand, despite serving 2.5 million customers every week. Our supermarkets already have extensive CCTV coverage.
3. The supermarket store experience itself promotes the availability of food and non-alcoholic beverages. Under the new Act, supermarkets are not able to display non-alcoholic beverages within the "single area" for beer, wine and cider (except alcohol-free beer and wine).
4. In our stores specifically, every sale of beer, wine or cider must be approved by an authorised restricted goods seller or supervisor, no matter whether the customer is 18 or 80. We have an ID 25 policy which is above and beyond the legal requirement around identification, as well as a policy to request identification where a member of the group looks under 25 and our staff reasonably believes that there is a possibility that beer ,wine or cider may be being purchased for this person. We believe most customers are now very aware of what constitutes appropriate ID. Store supervisors will ask for drivers licence, passport or the HANZ card, and no other form of ID is acceptable.
5. It is our company policy not to sell beer ,wine or cider that specifically markets to and promotes the consumption of alcohol by young people. We also have a policy of not selling beer ,wine or cider below cost.

APPENDIX 1A



Liquor and Tobacco Policy

As a responsible corporate citizen Progressive Enterprises Limited ("Progressive") has many obligations within the community – one of these is for the responsible and legal sale of liquor and tobacco.

The Company takes this responsibility seriously and is constantly reviewing the policies and procedures surrounding the selling of liquor and tobacco.

Responsibilities include:

- Sale of liquor and tobacco must meet all legislative requirements
- Duty of care to our staff
- Duty of care to our customers

Heavy fines can be issued for selling to:

- A minor
- A person buying liquor/tobacco for a minor (secondary supply)
- Intoxicated persons

As a company we must be aware of and be responsible for every sale of liquor and/or tobacco before authorising it – by being alert and following the correct policy, processes and procedures, thereby complying with the legislation and ensuring we are doing our job.

At times we may need to refuse customers (liquor/tobacco) in order to comply with the law and our policy/procedures. Such situations can be challenging and customers may not always be happy when a sale of liquor/tobacco is refused.

By abiding by the law and the Company's policy and procedures it may result in losing a sale but it is better to refuse an irresponsible sale and comply with the law than run the risk of incurring:

- A large personal fine – up to \$2,000
- Criminal record
- Possible disciplinary action that may result in termination of employment
- Large fine for the Company
- The possibility of loss of liquor license

We are under no obligation to sell liquor or tobacco if it is irresponsible to do so. The Company supports your role in making the right decisions to ensure we are responsible and abiding with The Sale and Supply of Alcohol Act.

July 2014



Our Policy

- We must not knowingly sell liquor or tobacco to anyone under the age of 18. It is a criminal offence to allow the sale or supply of liquor or tobacco to a minor (anyone under the age of 18).
- We are required to assess if a customer is under the age of 25 years. If they appear to be then we must ask for proof of identification before the purchase of liquor and tobacco. Whenever proof of age has been requested the date of birth that is on the identification is to be entered into the Point of Sale as evidence of ID checking.
- It is Company policy that if appropriate identification is not supplied where requested then the attempt to purchase liquor or tobacco will be declined.
- To help prevent 'secondary supply', our policy is to request identification for any person in a group where a member of the group looks under the age of 25 and our team reasonably believes there is a possibility that beer or wine may be being purchased for this person.
- At times, the company may need to refuse customers service in order to comply with this policy. While customers may not always be happy when a sale is refused, the company will support the role its team plays in making the right decisions to maintain our commitment as a responsible retailer.

No proof of age = no sale

- If a staff member knowingly accepts incorrect identification for the purchase of liquor or tobacco, this will be treated as serious misconduct, subject to disciplinary procedures which may include termination of employment, and possible personal and Company fines.
- If a staff member knowingly / deliberately fails to ask for proof of age from any person who is purchasing liquor or tobacco and who appears under the age of 25 years, it will be treated as serious misconduct, subject to disciplinary procedures which may include termination of employment, and possible personal and Company fines.
- If a staff member knowingly sells/supplies liquor or tobacco to a person under the age of 18 years, this will be treated as serious misconduct, subject to disciplinary procedures and possible personal and Company fines. This includes supply via a third party.

Note: Adults are not allowed to supply liquor to anyone under age (under 18) unless they are the parent of the minor.

- We may not knowingly sell liquor to an intoxicated person.

Acceptable Forms of ID are:

Photo identification is the only acceptable form of identification when purchasing tobacco and liquor – the only acceptable forms of photo identification are:

- HANZ 18+ identification card
- Valid passport (NZ or International). Passports must be valid & original
- NZ Photographic Drivers Licence

July 2014

Selling Alcohol: Our Policy

**We take our responsibilities very seriously,
which is why a Checkout Supervisor
authorises all alcohol purchases.**

ID25: No ID, no sale

By law we cannot sell alcohol to anyone under 18. If you look under 25, we will ask you for ID. Please be prepared with one of these forms of approved ID:

- HANZ 18+ Identification card
- Valid passport (NZ or International)
- NZ Photo Driver Licence



**If we think you're under,
you'll have to hand it over.**

Group Purchases

When a group of people enter the store and one or more of the group attempt to buy alcohol – any member of the group that appears under the age of 25 will be asked for identification.

If you cannot supply ID, we will not supply anyone in the group with alcohol.



Intoxication

We will refuse the sale of alcohol to any customer we believe is under the influence of alcohol or drugs.

Thank you for your co-operation.

countdown

APPENDIX 2: FURTHER INFORMATION SOUGHT

FROM THE POLICE

We seek the following Police information, for the years 2006 to 2016:

Police CARD Data (cleaned)

- *Geographic Coverage – by X-Y coordinate for the Police Areas (if more than one) covering the relevant territorial authority (“TA”). That is, the same total geographic extent as the Reports and Files data described below, acknowledging that this may cover an area beyond the TA boundary.*
- *Time Series – Calendar Year 2006-2016.*
- *Format – Excel spreadsheet.*
- *Offence Categories – Data supplied to Progressive and other researchers in other PLAP hearings has shown considerable variation in offence codes. We request a definitive set of offences considered by the Police to be “Alcohol Related Incidents”. As a possible starting point, the following list was taken from Police evidence received in other cases. Note, we have appended codes to some, but not all of the offence descriptions provided.*
 - o *1410 - Grievous Assaults*
 - o *1510 - Serious Assaults*
 - o *1640 - Minor Assaults*
 - o *1710 - Intimidation/Threats*
 - o *1820 - Unlawful Assembly*
 - o *1830 - Crimes Against Personal Privacy*
 - o *1D - Domestic Dispute*
 - o *1H - Drunk Home*
 - o *1K - Drunk Custody/Detox Centre*
 - o *2210 - Sexual Affronts*
 - o *2630 - Sexual Attacks*
 - o *2650 - Rape*
 - o *3530 - Disorder*
 - o *3910 - Liquor Offences*
 - o *Abduction for Sex*
 - o *Breach of the Peace*
 - o *Domestic Violence*
 - o *LIQURBAN - Breach Of Local Council Liquor Ban*
 - o *Obstructing/Hindering/Resisting*
- *We would also like to know if the following offences should be included in the definitive list of “ARI” offences, and if so the relevant data on these offences should also be*

included.

- o *Noise Complaint (1N) – alcohol probably involved*
 - o *Homicide (1110) – alcohol probably involved*
 - o *Unlawful Sex (2810) – alcohol probably involved*
 - o *Breach of Protection Order (3850) – alcohol possibly involved*
 - o *Breach of Peace (1R)*
 - o *Criminal Harassment (1840)*
- *Data fields to be supplied:*
 - o *Event Number*
 - o *Accept Date*
 - o *Accept Time (HHMM) or hour band acceptable*
 - o *Offence Code (detailed above – definitive list)*
 - o *Result Code (including Cancelled)*
 - o *X-Y coordinate (northing, easting)*
 - o *Police District*
 - o *Police Area*
 - o *Recorded Offence / Count of offences (if not '1' for each record)*
- *In addition to the above data set, the following supporting information should be provided:*
 1. *Date of extraction (for file reference).*
 2. *Description of result codes.*
 3. *Notes on any material changes in offence codes occurring within the time period of the data and the implications of these in terms of inferring reliable trends from time series analysis.*
 4. *Notes on any changes in policing or reporting methods and the implications of these in terms of inferring reliable trends from time series analysis.*
 5. *Notes on any caveats or limitations of the data for use in informing the evidence base of a PLAP.*

Police Reports and Files Data

- *Geographic Coverage – break down by Police Area (if more than one) covering the relevant TA, acknowledging that this may cover an area beyond the TA boundary.*
- *Time Series – Calendar Year 2006-2016.*
- *Format – Excel spreadsheet.*
- *Offence Categories – Data from this source supplied for the Auckland PLAP included offences in the following categories - Driving Offences, Violent-Disorderly, W600 series offences (broken down), IK-IH, 3900 class offences (broken down). However, ideally the same "ARI" codes defined for the CARD dataset above would be included in this dataset, with the addition of any offences unrelated to 111 calls (such as drunk driving/driving offences).*
- *Data fields to be supplied:*

Local Alcohol Policy Sub: 060

- o Police District
 - o Police Area
 - o Scene Description
 - o Offence Code (detailed within the above listed categories)
 - o Recorded Offence / Count of offences
 - o Offence Start Date
 - o Offence Start Time (HHMM) or hour band acceptable
 - o Presence of alcohol detected / alcohol a contributing factor *
- *In addition to the above data set, please provide the following supporting information:*
 1. Date of extraction (acknowledging it is a dynamic database)
 6. Description of offence codes and their appropriate categorisation/grouping.
 7. Master list of 'scene descriptions'.
 8. Notes on any material changes in offence codes occurring within the time period of the data and the implications of these in terms of inferring reliable trends from time series analysis.
 9. Notes on any changes in policing or reporting methods and the implications of these in terms of inferring reliable trends from time series analysis.
 10. Notes on any caveats or limitations of the data for use in informing the evidence base of a PLAP.
 11. * subject to availability.

FROM MOH

We seek the following MoH information (electronically by way of an excel spreadsheet), for the years 2006 to 2016 (to the extent available):

- (a) Emergency Department attendances, by day and time of admission;
- (b) Emergency Department attendances by resident location (CAU), age and sex;

FROM COUNCIL

We seek the following Council information (electronically by way of an excel spreadsheet), for each of the years 2006 to 2016:

- (c) Licence name;
- (d) Licence type;
- (e) Location (address or geo-location);
- (f) GFA; and
- (g) Licence hours.

From: Alan Morris
To: [!Policy Submissions](#)
Cc: [Alan Morris](#)
Subject: New Alcohol Rules
Date: Saturday, 13 May 2017 2:31:19 p.m.

To Whom It May Concern

-

I have read the proposed new, 'On licence' trading hours, and I cannot fathom how your Council has arrived at such a recommendation in regard to 'On Licence' closing hours. That is, hotels, bars and nightclubs closing at 2.00am and similar clubs closing at 12.00am (midnight). Make a simply single rule for all establishments!

I have no issue with opening hours. If there are problem spots about town, then use the appropriate measure already in place to sort them out.

In my experience, being involved with the hospitality industry for some time now, most clubs have a far more responsible view and enforcement of the licencing rules and have far fewer problems than do the, pubs, bars and nightclubs. Surely the police and the DLC Inspector could give you this information as it is all held 'On Line'.

If not, Why not?

Most clubs, unless there is a special need, are closed anyway long before 2.00am. The most problems I have observed have come from issues arising from the patrons leaving pubs, bars and nightclubs after 2.00am and many times a lot later, quite often 2.30 -3.00am. These establishments are not hard to find.

Most clubs have an in-house transport system to offer safe passage home for patron who have stayed on and tend to be pro-active in this regard.

I agree with the 'closed door' policy after 12.00am and I think most clubs do that now anyway, some being a lot earlier. If there are some problem areas, sort them out before punishing those that are out being responsible and just taking part in an enjoyable and safe environment, which many clubs provide.

I take my position of responsibility very seriously and consider this proposed new rule, somewhat offensive to all those involved with the management and staffing of responsible clubs in Whanganui. Surely a starting point would be to consult with those directly involved in the industry. It seems to me

(and I could be wrong) that your staff have not bothered to get out and ask the hard question and do their job and come up with an informed opinion, it's easier to make baseless statements and wait for the reactions.

Yours faithfully

A.F. Morris

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170514-D9EYT-265
Date: Sunday, 14 May 2017 10:27:50 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170514-D9EYT-265

Attachment: not attached

Title: Mr

Name: JOHN MILNES

E-Mail: johnmilnes@hotmail.co.nz

Address

66B Delhi Ave
Aramoho
Whanganui 4500

Phone: 0274778303

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Agree

Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Neither agree nor disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Disagree

Discretionary conditions may apply to club licences (pg. 11): Neither agree nor disagree

Discretionary conditions may apply to special licences (pg. 11): Disagree

Do you have any further comments to make?

I feel that so much about the sale of alcohol is "normalisation" of what has become recognised as a dangerous drug and many of its negative and dangerous side effects are explicitly mentioned in the proposed alcohol policy, page 7.

It suggests some serious social and economic effects to our community from the consumption of alcohol. One of the enabling factors is the availability of alcohol, both in terms of outlets and the hours of availability.

The ease with which it seems possible to open a new outlet doesn't seem to have been addressed except in terms of "proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship". But oddly, supermarkets and grocery stores are exempted from this restriction. This, to me, is a major mistake, although it is possibly not possible for the WDC to act to stop supermarkets and grocery stores selling alcohol. The fact that it is such a dangerous drug seems to have been ignored in the legislation, although there is a strong lobby group to keep the status quo.

I would also want signage outside these alcohol outlets to be regulated to reduce exposure to this drug. I use the term "drug" because of its harmful effects and use the metaphor by asking you to imagine drug outlets as common as liquor stores advertising "Metamphetamine, Heroin, Marijuana, LSD, ecstasy! It is ridiculous, dangerous and unacceptable.

We accept a sinking lid policy in Whanganui on pokey machines, it should be the same with alcohol licences.

It is a pity that the alcohol industry (encouraged, no doubt, by supermarkets) convinced Government in 1990 to allow supermarkets and superettes to sell wine and later beer, increasing the probability of binge drinking. Back in 2010 Liquor Licensing Authority chairman Judge Edward Unwin wondered whether the supermarket was [often] a "bottle store which also sells groceries."

Even if our council cannot do anything to curb supermarkets et al they should tell the Government to do so.

Alcohol is a dangerous drug and should be treated so.

Have you submitted to Council before?: Yes

Gender: Male

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-5LA3S-EZX
Date: Monday, 15 May 2017 9:39:22 a.m.
Attachments: [HFWRR LAP submission.docx](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-5LA3S-EZX

Attachment: attached

Title: Mrs

Name: Julie Herewini

E-Mail: julie.herewini@teoranganui.co.nz

Address

57 Campbell Street
Whanganui

Phone: 0210611614

Organisation: Healthy Families Whanganui Rangitikei Ruapehu

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Disagree

Maximum trading hours for restaurants 8am to 12am midnight: Disagree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Disagree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

Please see submission attached

Have you submitted to Council before?: Yes

Gender: Female

Age: 30-39 years

Ethnicity: Maori

Other ethnicity: not supplied

HEALTHY FAMILIES WHANGANUI RANGITĪKEI RUAPEHU
LOCAL ALCOHOL POLICY SUBMISSION

Healthy Families Whanganui Rangitīkei Ruapehu (HFWRR) is about creating healthy change where we live learn work and play. One of the four core focus areas of our kaupapa is reducing alcohol related harm.

HFWRR are active members of the Alcohol and Other Drugs reference group of Safer Whanganui, working collaboratively with other stakeholders in relation to health promotion, prevention, treatment and enforcement.

HFWRR wholeheartly support the Whanganui District Council's move to develop a Local Alcohol Policy to ensure **the sale, supply and consumption of alcohol is undertaken safely and that harm caused by the excessive or inappropriate consumption of alcohol is minimised**. HFWRR would like to stress that during this submission process it is important to remember that this is the objective of the Sale and Supply of Alcohol Act 2012 which allows for this policy.

HFWRR supports policy objective **1. Location of licensed premises to be considered in line with sensitive locations**. In the last few years there have been a number of new off-licensed premises that have opened in close proximity to schools and early childhood centres, that, had this policy been in place, would not have been possible. As such there are a number of examples where our children and young people are exposed to alcohol advertising daily on their way to and from their place of learning which serves to add to the normalisation of our drinking culture. The Ministerial Forum on Alcohol advertising and sponsorship report 2014 states that there is an association between exposure to alcohol advertising and sponsorship, earlier age of initiation to drinking alcohol, and increased consumption. In addition there is also compelling evidence that early initiation to drinking alcohol and increased consumption are predictive of, and associated with, increased experience of alcohol-related harm.¹

HFWRR also supports policy objective **2. District-wide limit on off-licensed premise**. The July 2013 "Community Views on Alcohol Research Report" states that 56% of respondents identified that there were too many liquor outlets in Whanganui with a further 35% identifying there were enough. With a total of 22 current off-licenses, one for every 1440 adult residents, there are more than enough to adequately service our population. The location of many of these off-licensed premises in high deprivation areas² is also cause for concern and in order to mitigate this trend HFWRR would like to see the district wide limit **extended to include supermarkets and grocery stores**. Research identifies that the greater availability of alcohol leads to increased consumption, which in turn leads to more social harms.³

¹Ministerial Forum on Alcohol Advertising & Sponsorship 2014

² Location of Outlets - Local Alcohol Policy Research Report 2016

³ The relationship between alcohol outlets and harm A spatial panel analysis for New Zealand, 2007-2014

Information provided by police⁴ in relation to the number of drunk custodies that occur between 1am-2am support the need for objective **3. *A one way door restriction will apply.*** To assist in mitigating the risk of incidence when large numbers of patrons exist on-licensed premise at once.

In respect of the objective **4. *Maximum trading hours will be set*** HFWRR would recommend the following hours:

On license hours:

Taverns, hotel, bar, pub, or nightclub	10am-2am
Restaurants	10am-12am midnight

Off-license hours:

Supermarkets and grocery stores	10am – 9pm
Bottle stores, hotels, bars, taverns & wineries	10am – 9pm

Club licence hours	10am - 12am midnight
--------------------	-----------------------------

HFWRR strongly believe that alcohol should not be available for purchase before 10am. Having the ability to purchase alcohol for 19 hours of a 24 day is unnessecary.

HFWRR support objective **5. *The District Licensing Committee may consider discretionary conditions.*** And further recommend:

- **provisions are included which prohibit the sale of single alcoholic drinks**
- **Off-licenses to cease alcohol sales when children leave school (i.e 3-4pm)**

Thank you for the opportunity to submit our views in relation to this very important policy that will be a strong preventive measure in relation to alcohol related harm and considers the health and wellbeing of our community a priority.

⁴ Police NZ 2016 - Local Alcohol Policy Research Report 2016

From: Rachel Rose
To: [!Policy Submissions](#)
Subject: alcohol policy
Date: Monday, 15 May 2017 9:56:50 a.m.

I wish to record my unqualified support for the Council's effort to reduce the harm caused by our community's high levels of alcohol consumption.

I strongly support these proposed measure:

- off-licence hours (bottle stores, supermarkets, grocery stores, etc) 7 am to 9 pm
- On-licence – pubs, bars, nightclubs – 8 am to 2 am, & 1-way door policy for last hour
- Clubs – RSA, sports, etc – 8 am to 12 am
- No new bottle stores
- No new bottle store permitted close to ECC, schools, marae or places of worship.

However I encourage the Council to go further, and include limits on new supermarket and grocery outlets selling alcohol. Thanks for standing up to the lobbying weight of the supermarket chains. There should be no special rules for them.

I would also like to see limits on advertising. In my neighbourhood (where we seem to have already passed saturation point for alcohol outlets, with three within 350m of each other!) I note with dismay their prominent advertising. The crude sales pitch focuses pointedly on the percentage of alcohol and cost; the message is clear.

Thanks for addressing this issue.

Yours sincerely

Rachel Rose

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-6SLH9-HT6
Date: Monday, 15 May 2017 11:41:24 a.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-6SLH9-HT6

Attachment: not attached

Title: Mrs

Name: Jenny Murphy

E-Mail: manager.wanganui@liquorland.co.nz

Address

291 Victoria ave
Wanganui

Phone: 0275536696

Organisation: Liquorland

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Agree

Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

As the owner of an Off-Licence I believe that the issues around the sale of liquor are not the opening

times, rather the closing times. My experience is that my early morning customers (8>9am) are either shift workers on their way home, elderly that would rather get their shopping done earlier to take advantage of no parking fees or generally organised people, especially rural who are needing to get in and out of town. I am totally in favour of shutting at 9.pm to eliminate risk to staff and business given the issues around hold-ups around the country.

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: NZ European

Other ethnicity: not supplied

15 May 2017

Local Alcohol Policy
Whanganui District Council
PO Box 637 4540
Whanganui

To Whom It May Concern

Whanganui Draft Local Alcohol Policy

Thank you for providing the opportunity for the Health Promotion Agency (HPA) to comment on the Whanganui District Council draft Local Alcohol Policy (LAP).

We wish to speak to this submission.

INTRODUCTION

HPA has the statutory function of giving advice and making recommendations on the sale, supply, consumption, misuse and harm from alcohol. Since 1 July 2012 HPA assumed the functions of the former Alcohol Advisory Council of New Zealand and Health Sponsorship Council and some functions of the Ministry of Health.

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

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

ENGAGEMENT

HPA encourages and supports territorial authorities to develop policies that are well consulted and reflect local community views. We are pleased to see that the Council has engaged with Police, the Medical Officer of Health and Licensing Inspectors as part of the LAP development process. LAPs should also reflect the view of the community as much as possible, and for this reason we recommend that in the early stages of the development of the draft LAP, engagement with a broad sector of the community and stakeholders should be undertaken. This wider engagement, if

reflected in the policy, will provide the Council with a policy that is more likely to reflect the desires of the community. We were therefore pleased to see that the Council undertook a survey with residents, and engaged with the local taxi service and the Safer Whanganui Alcohol and Drugs Reference Group.

BACKGROUND PAPERS

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

POLICY VISION AND PURPOSE

LAPs not only provide guidance to District Licensing Committees (DLCs), the Alcohol Regulatory and Licensing Authority (ARLA) and local alcohol retailers, but they also provide an opportunity for communities to be involved in shaping the trading hours, location and density of outlets, and conditions on licensed premises in ways that fit with community desires. HPA is supportive of the goals and objectives of the draft LAP and they relate well to the objectives of the Act.

TRADING HOURS

HPA supports a reduction in trading hours for licensed premises because national and international research indicates there is a relationship between the hours of sale of alcohol and alcohol-related harm. Findings show both an increase in harm when trading hours are increased and a decrease in harm when trading hours are reduced¹. We encourage territorial authorities to set maximum trading hours that are appropriate for the community and take into account the views of the community through good engagement and consultation on the development of the policy.

The Ministry of Justice undertook research as part of the development of the risk-based fees regime. The findings indicate that the rate of attributable alcohol-related offences associated with licensed premises increases with later closing times. Compared with expected offences when premises close at midnight, the rate is 1.6 times higher when they close at 1am rising to 8.9 times when they close at 5am².

¹ Babor T., Caetano, R., Casswell, S., Edwards, G., Giesbrecht, N., Graham, K., Grube, J., Hill, L., Holder, H., Homel, R., Livingston, M., Osterberg, E., Rehm, J., Room, R., Rossow, I. (2010). *Alcohol: No Ordinary Commodity: Research and public policy*, 2nd edn. Oxford: Oxford University Press.

² Ministry of Justice. (2013). *Risk-based licensing fees. Identifying risk factors for the New Zealand context*. Wellington: Ministry of Justice.

In the same report, the Ministry of Justice presented empirical data suggesting a link between off-licence premises and alcohol-related harm. Findings included:

- seventy six percent of alcohol is sold through off-licences³
- sixty percent of alcohol-related offences are linked to home and public consumption which in turn is linked to off-licence purchase⁴
- a high level of alcohol-related harm occurs between the hours of 10pm and 5am, and the growing differential in prices between off-licence and on-licence premises has led to the phenomenon of pre-loading and side-loading, where people consume large quantities of alcohol before entering an on-licence premises or leave to top up before re-entering. Off-licence premises with later trading hours are more likely to be associated with pre-loading and side-loading, thus contributing to alcohol-related harm⁵.

The Ministry of Justice's research provides further support that limiting trading hours for the sale of alcohol is a key policy lever for reducing alcohol-related harm.

Therefore we support the trading hours proposed for off-licences and support a consistent approach to all off-licences having the same trading hours. We also support the trading hours proposed for on-licences and clubs.

ONE-WAY DOOR RESTRICTION

Although we are supportive of the trading hours proposed for on-licences we believe that the evidence for reducing alcohol-related harm is stronger for reduced trading hours than for a one-way door policy. However, in the Tasman Provisional LAP decision ARLA confirmed that "The territorial authority does not need to be sure that a particular element of its P⁶LAP will minimise alcohol-related harm.... A precautionary approach can be used to see if it will achieve the statutory object."⁷ This was added to in the Wellington decision, with ARLA stating that a precautionary approach can be used "provided there is an evidential basis supporting it."⁸ Given the concerns about alcohol-related harm generally and the high number of incidents of violent events in town centres, HPA supports measures that may

³ SHORE and Whariki Research Centre

⁴ Police POLD data

⁵ Ministry of Justice. (2013). *Risk-based licensing fees: Identifying risk factors for the New Zealand context*. Wellington: Ministry of Justice.

⁶ Provisional

⁷ Hospitality New Zealand Incorporated v Tasman District Council [2014] NZARLA PH 846, para [54].

⁸ B & M Entertainment & Anors v Wellington City Council [2015] NZARLA PH 21-28, paras [18] and [80].

reduce the incidents of alcohol-related harm as long as there is ongoing monitoring and evaluation to assess the impact of the policy.

Recommendation

HPA recommends that the one way door policy is monitored and evaluated.

SPECIAL LICENCES

In LLA 1813/92⁹ the Liquor Licensing Authority (the Authority) reminded District Licensing Agencies that they must avoid the issue of special licences for series of occasions or events that in effect give the applicant the same, similar or even greater licensed hours than may be sanctioned by the Authority in a permanent licence. Therefore, HPA suggests that the Council has some guidelines around trading hours for special licences (i.e. trading hours should not exceed the national maximum trading hours of 8am to 4am even in exceptional circumstances) and a proposed limit on the maximum number of events included in special licence for a series of events. We suggest that not more than 12 events in a six month period would be appropriate.

Recommendation

That special licence trading hours are not granted for hours outside of the national maximum hours allowed for within the Act and that the number of events in a six month period is limited to 12.

LOCATION OF PREMISES

The Law Commission's consultation found that communities feel strongly about the location of premises where alcohol is sold¹⁰. LAPs are the main mechanism for people to have a say about how alcohol is sold in their communities so we are pleased to see that the Council has considered the proximity of licensed premises to sensitive sites. However, "close proximity" is not defined which may make it a difficult policy to implement. Other areas have used definitions such as 100m or 300m.

⁹ <http://www.nzlii.org/cgi-bin/sinodisp/nz/cases/NZLLA/2002/50.html?query=LLA5201813/92>. It stated that if there is a possibility of meeting the statutory objective, then it is entitled to test whether that possibility is a reality

¹⁰ Law Commission. (2010). *Alcohol in our Lives: Curbing the Harm: A report on the review of the regulatory framework for the sale and supply of liquor*. Wellington: Law Commission.

Recommendation

HPA recommends that “close proximity” is defined within the policy.

DENSITY PROVISIONS

The Law Commission’s consultation also found that outlet density is one of the most pressing issues around the sale of alcohol for many communities. Studies have suggested an association between the number of outlets and increased levels of alcohol consumption at a neighbourhood level.

Research undertaken by the University of Waikato National Institute of Demographic and Economic Analysis looked at the impacts of liquor outlets in Manukau City. The research found that:

- on-licence outlets are most dense in areas with good transport links, such as in town centres and areas with high amenity value. This is because these outlets cater to consumers who are looking for a destination at which to drink, or where drinking is incidental to some other activity such as eating a meal
- off-licence outlet density is not only related to population density, (a higher population density is associated with a higher density of off-licence outlets), but also to relative deprivation (higher relative deprivation is associated with higher density of off-licence outlets)
- further, off-licence outlets are not typically gathered together in clusters but are distributed throughout the area. While this reduces local competition it also increases access to alcohol at a neighbourhood level
- areas with more off-licence outlets have higher levels of competition between those outlets, leading to lower prices, longer operating hours and later weekend closing times ¹¹
- higher numbers of off- and on-licences were associated with a higher number of police events. In particular, off-licence density was associated with higher levels of anti-social behaviours, drug and alcohol offences, family violence, property abuse, property damage, traffic offences and motor vehicle accidents. Density of clubs and bars was associated with higher levels of anti-social behaviour, dishonesty offences, drug and alcohol offences, property abuse, property damage, sexual offences, traffic offences and violent

¹¹ Cameron, M.P., Cochrane, W., McNeill, K., Melbourne, P., Morrison, S. L., Robertson, N. (2010b). *The spatial and other characteristics of liquor outlets in Manukau City: The impacts of liquor outlets report no. 3*. Wellington: Alcohol Advisory Council of New Zealand.

offences. Density of restaurants and cafes was associated with higher levels of dishonesty offences, property abuse, traffic offences and motor vehicle accidents¹².

The most recent research by the University of Waikato¹³ investigated the impact of alcohol outlets on police activity at the local (Census Area Unit) level across New Zealand from 2007 to 2014. The results build on previous research and show that the number of off-licence outlets has simple direct positive relationships with violence, anti-social behaviour and sexual offences. That is, additional off-licences are associated with additional incidents of these types of social harm. The number of off-licences also has positive relationships with drug and alcohol offences, property damage and motor vehicle crashes, but in these cases the nature of the relationship is influenced by the size of the population (where a positive relationship is present for low population areas)¹⁴. This research also found that bottle stores and supermarkets were similar in terms of their impacts on social harm¹⁵.

Overall, the evidence behind decreasing the number of alcohol outlets to decrease alcohol-related harm is strong, and we therefore support the use of tools that will assist with limiting the numbers of outlets. A number of councils around New Zealand have developed measures for reducing density within their draft LAPs, especially in communities where there is already high community stress and/or alcohol-related harm. We therefore support Whanganui's district-wide limit on off-licensed premises

DISCRETIONARY CONDITIONS

We are pleased to see that Whanganui District Council has considered the addition of discretionary conditions. An indicative list does not fetter the discretion of the DLC to impose '...any reasonable condition' on a licence as set out in section 117(1) of the Act, and is very helpful in cases where reporting agencies or members of the public may be asked by the DLC to consider what conditions they think might minimise any negative impacts if the licence were to be granted. We suggest that this section reflects the ability for the DLC to impose any reasonable condition over and above the examples listed in the LAP. HPA believes that carefully considered licence conditions can be an effective measure to promote safe, responsible sale and supply of alcohol and to minimise the harm caused by its excessive or inappropriate consumption in line with the object of the Sale and Supply of Alcohol Act 2012.

¹² Cameron, M.P., Cochrane, W., McNeill, K., Melbourne, P., Morrison, S. L., Robertson, N. (2011). *A spatial econometric analysis of selected impacts of liquor outlet density in Manukau City: The impacts of liquor outlets report no. 4*. Wellington: Alcohol Advisory Council of New Zealand

¹³ Cameron, M.P., Cochrane, W., Livingston, M. (2017 version 2). *The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand, 2007-2014*. Wellington: Health Promotion Agency.

¹⁴ Reported associations are statistically significant at the 10% level.

¹⁵ Tests of equality of coefficients show supermarkets and bottle stores are similar (the tests were not statistically significant) for seven out of the eight social harms examined. As a result they were treated as a single combined off-licence category.

Recommendation

HPA recommends that it is clarified that the DLC may apply any reasonable condition that it believes will minimise alcohol-related harm, and that it is not limited to the list provided in the LAP.

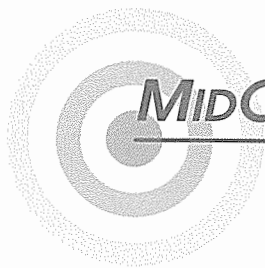
CONCLUSION

Once again, thank you for the opportunity to comment on the Whanganui District Council's draft LAP. Please do not hesitate to contact Cathy Bruce, Principal Advisor Local Government, e-mail c.bruce@hpa.org.nz, phone 03 963 0218 if you would like to discuss any parts of this submission further.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Cath Edmondson', is written on a light blue rectangular background.

Cath Edmondson
General Manager Policy, Research and Advice



MIDCENTRAL HEALTH

A division of MidCentral District Health Board providing specialist health and disability services

Public Health Centre

Lambie Hostel, Wanganui Hospital, Private Bag 3003, Wanganui

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Palmerston North 4442
New Zealand

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Ruahine Street
Palmerston North
New Zealand

15 May 2017

Submission on Draft Local Alcohol Policy

To: Whanganui District Council
Submission on: Draft Local Alcohol Policy
Name: Medical Officer of Health, Whanganui
Address: Public Health Centre, Private Bag 3003, Whanganui

Introduction

The Sale and Supply of Alcohol Act 2012 puts in place a system of control over the sale and supply of alcohol with the goal of safe and responsible consumption, and the minimisation of harm. The Local Alcohol Policy is a reflection of community opinion and is an important guide to those deciding the conditions and the granting of licences in their area. The relevance of Public Health is acknowledged by the role of the Medical Officer of Health in reporting on licence application and renewals.

Location of Licensed Premises

We agree that the District Licensing Committee is in the best position to judge whether a new licence is in close proximity to a sensitive site, and whether it is likely to affect amenity and good order. We are confident the committee will use good sense and discretion.

In order to give more guidance to the committee, the first paragraph on page 8 could be re-worded as:

“With respect to any new licence applications, the District Licensing Committee shall have regard to the proximity to facilities identified as a sensitive site. In assessing close proximity they shall have regard to the specific activity at the sensitive site, and to any impacts on amenity and good order”.

District-wide limit on off-licensed premises.

It is estimated that about 70% of alcohol is purchased via off-licence premises. As the number of such off-licences increases it is likely that ease of access, along with competitive pricing and special deals, will promote greater consumption.

Comparison with other local authorities with which Public Health services are involved shows the following distribution of licences.

Table 1. Summary of Off-Licences in Region

District	Bottle stores	Tavern/club	Supermarket	Grocery	Other
Whanganui	9	2	5	5	1
Rangitikei	5	3	3	2	0
Manawatu	2	5	1	2	1
Palmerston North	13	4	9	13	2
Horowhenua	5	6	5	4	2
Tararua	6	11	2	3	2
Total	40	31	25	29	8

This information can be presented in terms of the number of licences per head of population.

Table 2. Off-Licences per 10,000 population

District	Bottle stores	Tavern/club	Supermarket	Grocery	Other
Whanganui	2.1	0.5	1.1	1.1	0.2
Rangitikei	3.4	2.0	2.0	1.4	0.0
Manawatu	0.7	1.7	0.3	0.7	0.3
Palmerston North	1.5	0.5	1.0	1.5	0.2
Horowhenua	1.6	1.9	1.6	1.3	0.6
Tararua	3.4	6.3	1.1	1.7	1.1
Total	1.8	1.4	1.1	1.3	0.4

There is no defined range for the preferred number of off-licences in a given region. Nevertheless we can confidently say that Whanganui is well-provided with bottle stores when compared with nearby areas. Setting a limit on the current number is a prudent measure to prevent over-supply and the problems this may bring. We support the limit proposed in the draft policy.

A minor point to consider is that there is one off-licence locally in the “other category”. It is a low-risk situation and can be excluded from calculations when setting the upper limit for off-licence numbers in our area.

One-way door restriction

We support moves to reduce traffic between licensed premises in the hour between 1am and 2am on the nights they are open to this time.

Maximum Trading Hours

The trading hours for tavern, hotel, bar or night-club, are in line with those applied locally for several years, under the Liquor Policy 2008, and we believe the system is working well.

The main difference proposed is for off-licences to be open 7am to 9pm. This brings supermarkets into line with other off-licence premises, and we support this standardisation.

In summary we support:

1. Discretion for the District Licensing Committee when assessing close proximity to a sensitive site;
2. Setting a limit to the number of bottle stores and tavern/club off-licences;
3. Having a one-way door restriction in the final hour of late operation for taverns, bars, pubs and night clubs;
4. Setting 7am to 9pm as the trading hours for off licences.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patrick O'Connor', with a long horizontal line extending to the right.

Patrick O'Connor
Medical Officer of Health
Whanganui

41 Durie St

Durie Hill

Whangarei

12.5.17

Submission on Alcohol.

I'm very concerned about alcohol being situated in positions to take advantage of the poor as we readily see in South Auckland.

Even when locals requested to have fewer liquor hours & ~~the~~ outlets - wishes were ignored with shop owners now wanting their own special police protection!

That is absurd. We know the harm that liquor does yet continue to make it easy to access.

1. I support restricted hours in clubs & sports centres
2. Keep outlets away from schools & youth centres
3. Supermarkets should not be exempt from restrictions in the draft policy.

As an ex nurse I've dealt with the unpleasant & often horrific effects of excessive alcohol.

Why should high profits & greed for a few be permitted to cripple so many lives.

Advertising of liquor associated with sporting heroes & other celebrities should be banned.

Districts who know their populations should have a major say in these matters.

Sincerely Rosemary Baragwanath

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-7ZW38-VFY
Date: Monday, 15 May 2017 1:43:25 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-7ZW38-VFY

Attachment: not attached

Title: Service Manager

Name: Annie Firaza

E-Mail: anniefiraza@lifetothemaxtrust.org.nz

Address

PO Box 443
Whanganui 4540

Phone: 06 3448555

Organisation: Life to the Max Trust

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly disagree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly disagree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly disagree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

While limits are being applied to new bottle stores there are no limits to supermarkets or grocery stores. I think there should be limits to them as well especially in areas such as Gonville given the types of issues within this community. Hours should not be so early for any place selling/serving alcohol. It should be least 10am open and the hours of sale particularly off license does not have to be so late. Would any restrictions be placed around rubbish from empty boxes of beer left in the area. I say this as often there are empty boxes/glass bottles discarded within the area that have been purchased from the supermarket.

Have you submitted to Council before?: Yes

Gender: Female

Age: 40-49 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-80E4U-78V
Date: Monday, 15 May 2017 1:45:59 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-80E4U-78V

Attachment: not attached

Title: Mrs

Name: Susan Stuart

E-Mail: not supplied

Address

61 Montgomery Road
Whanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

The purpose of the Sale and Supply Act (2012) was to provide legislative change to improve New Zealand's drinking culture and reduce the harm caused by excessive drinking. One key change for communities was that the Act allowed territorial authorities to develop Local Alcohol Policies (LAPs)- giving legal standing to LAPs that determine when and where alcohol outlets can open.

The community survey undertaken in 2013 clearly identified residents' expectation that Council take a leadership role and adopt an effective LAP to reduce the availability of alcohol and subsequent high rates of hazardous drinking in Whanganui. Organisations that deal with the consequences of excessive alcohol consumption and associated harm used evidence and experience to support the development of the draft policy; one that could reduce the burden of alcohol-related harm in our city. The draft policy is an important legislative tool for Council to address alcohol-related harm and ensures Council have control over the availability of alcohol in their community.

Have you submitted to Council before?: No

Gender: Female

Age: 50-59 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-810IL-11JF
Date: Monday, 15 May 2017 1:48:48 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-810IL-11JF

Attachment: not attached

Title: Mr

Name: Craig Stuart

E-Mail: not supplied

Address

61 Montgomery Road, Whanganui

Phone: not supplied

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: No

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Agree

Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Agree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Male

Age: not supplied

Ethnicity: not supplied

Other ethnicity: not supplied



Submission on Whanganui Draft Local Alcohol Policy

15 May, 2017

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

Thank you for the opportunity to provide feedback on the Whanganui Draft Local Alcohol Policy.

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

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

Dr. Nicki Jackson
Executive Director
Alcohol Healthwatch
P.O. Box 99407, Newmarket, Auckland 1149
P: (09) 520 7035
E: director@ahw.org.nz

Introduction

Firstly, we would like to commend Whanganui District Council on their commitment to develop a Local Alcohol Policy (LAP) to minimise alcohol-related harm. It is clear that the Council are acknowledging and responding to community concerns regarding the negative impact of alcohol use in their district. This clearly aligns with the priority objective of the Sale and Supply of Alcohol Act 2012 (hereon referred to as the 'Act') being to increase community input into local alcohol decision-making.

We wish to acknowledge the efforts of the policy team, Council members and stakeholders in developing the LAP on behalf of their community. We further acknowledge the effort and expertise that Council officers have put into preparing the Local Alcohol Policy Research Report¹ to inform the development of Whanganui District Council's Local Alcohol Policy.

Alcohol Healthwatch strongly believes that a LAP is a *package* of measures which, when used comprehensively, can significantly minimise the high rates of hazardous drinking in Whanganui and subsequent alcohol-related harm in a local area. For this reason, we recommend that Whanganui District Council consider the LAP not just as a collection of isolated elements but as a cohesive package to reduce alcohol-related harm, insofar as it can be achieved with measures relating to licensing.

A LAP which has the effect of reducing the overall availability of alcohol has significant potential to minimise alcohol-related harm in Whanganui. By incorporating evidence-based measures to address the physical and temporal availability of alcohol, a LAP can support other harm reduction interventions in the local area and assist in sending a strong signal to communities regarding the harms associated with alcohol consumption.

We are acutely aware of the burden placed on Whanganui District communities through their involvement with individual licensing applications. Community members are required to keep up-to-date with licence applications in their neighbourhoods, collect evidence regarding their objections and take time out of their busy lives to travel to and attend District Licensing Committee hearings. A strong LAP can greatly assist to alleviate this burden.

The content of a LAP must be determined on its ability to contribute to achieving the object of the Act, that being:

1. *The sale, supply, and consumption of alcohol should be undertaken safely and responsibly; and*
2. *The harm caused by the excessive or inappropriate consumption of alcohol should be minimised.*

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

1. *any crime, damage, death, disease, disorderly behaviour, illness, or injury, directly or indirectly caused, or directly or indirectly contributed to, by the excessive or inappropriate consumption of alcohol; and*

¹ Whanganui District Council (2016) Local Alcohol Policy Research Report: For the development of Whanganui District Council's Local Alcohol Policy. Whanganui: Whanganui District Council.

2. *any harm to society generally or the community, directly or indirectly caused, or directly or indirectly contributed to, by any crime, damage, death, disease, disorderly behaviour, illness, or injury of a kind described in paragraph (a).*

Therefore, a LAP must seek to do two things: Firstly, it needs to reduce the significant levels of alcohol-related harm that already exists in Whanganui District and secondly; it needs to prevent further alcohol-related harm from happening (where able). Overall, we believe further provisions in Whanganui District Council's LAP should be included to maximise the effectiveness of the policy in minimising alcohol-related harm.

Location of licensed premises by reference to proximity to facilities of a particular kind or kinds

1. Alcohol Healthwatch **supports** the ban on new off-licences determined to be within close proximity to sensitive sites defined as early childhood centres, primary and secondary schools, marae, and places of worship.
2. Alcohol Healthwatch **recommends** specifically defining the term 'close proximity' (e.g. within 100 metres of the legal site boundary) so that the District Licensing Committee has clear guidance on Council intent.
3. Alcohol Healthwatch **recommends** that the range of sensitive sites is expanded to include alcohol treatment centres, public parks, and existing off-licence premises.
4. Sensitive sites identified in other Local Alcohol Policies throughout New Zealand have included: Marae, community facilities, playgrounds, high crime areas, high deprivation areas, recreational activities, residential areas, health facilities, and alcohol treatment centres. It is interesting to note that many of these sensitive sites were previously considered in licence applications in the Sale of Liquor Act 1962, but later removed in the liberalising legislation of 1989.
5. Alcohol Healthwatch **recommends** that the sensitive site policy applies to all off-licences including supermarkets and grocery stores.
6. The inclusion of all off-licence types in the proximity to sensitive site restrictions assists to de-normalise the commodification of alcohol among children. It also protects vulnerable populations (including those with alcohol use disorders) from easy access to cheap alcohol products obtained through supermarkets and grocery stores.

Whether further licences (or licences of a particular kind or kinds) should be issued for premises in the district, or any stated part of the district:

7. Alcohol Healthwatch **supports** the district-wide limit on off-licensed premises.
8. Given the high prevalence of hazardous drinking in the region (Table 1), the relationship of outlet density to violent offences and motor vehicle accidents (Figures 1-5), and the high levels of socioeconomic deprivation in Whanganui District (Figure 6), Alcohol Healthwatch **recommends** a cap on the number of on-licence bars and nightclubs, on-licence restaurants and cafes, and club licences. In relation to restaurants and cafes, Class I and II type premises could be restricted in the first instance.

9. In the event that Whanganui District implements a cap or sinking lid, Alcohol Healthwatch **recommends** that the maximum or target number of off-licences should be specified before the LAP is adopted, to prevent a rush of new licence applications as the LAP progresses towards adoption. A LAP appeal may also delay the adoption of the LAP, allowing many other premises to open for business. As an example, the adopted LAP for Waikato District Council specifies the maximum number of off-licences for specific geographic areas.²
10. Alcohol Healthwatch **recommends** that the district-wide limit on off-licensed premises also applies to supermarkets and grocery stores.
11. Section 93 of the Act permits the development of LAPs to “*be more restrictive than the relevant district plan.*” We **recommend** that Whanganui utilises this opportunity provided for in legislation to identify all neighbourhoods in the District that may be at increased risk of alcohol-related harm or are currently experiencing high levels of harm. By examining an area’s characteristics pertaining to outlet density, socio-economic deprivation, alcohol-related harm indicators and ethnic composition, areas at high risk of alcohol harm can be identified and prioritised within policies. This includes measures which have the effect of reducing the current availability of alcohol.
12. Therefore, Alcohol Healthwatch **recommends** the Council strongly considers further measures to reduce the number of off-licences currently in operation in the Whanganui District. For example, a sinking lid policy could be applied to reduce the number of off-licences in suburbs identified as being at high or moderately high-risk of alcohol-related harm. For example, Council officers (in their report informing the Draft LAP³) have identified areas such as Whanganui Central, Gonville, Castlecliff, Whanganui East, and Aramoho as having high concentrations of licensed premises and an elevated risk of alcohol-related harm.
13. These areas that have high levels of outlet density warrant special attention and protection given the growing body of high-quality evidence demonstrating the association between off-licence outlet density and harm in both adults and young people (e.g. increased hospital admissions for assault and chronic alcohol-related admissions and an increased prevalence of risky drinking). It is worth noting that high densities of off-licence premises has a stronger association with assaults in areas characterised by socioeconomic deprivation.^{4 5 6}
14. Alcohol Healthwatch further **supports** the cap on off-licence outlets given the many problems that communities have experienced using the amenity and good order

2 Waikato District Council

3 Whanganui District Council. (2016). Local Alcohol Policy Research Report: For the development of Whanganui District Council’s Local Alcohol Policy. Whanganui: Whanganui District Council.

4 Babor et al (2010). Alcohol No Ordinary Commodity: Research and Public Policy. 2nd ed. Oxford University Press (p.145).

5 Livingston, M. A longitudinal analysis of alcohol outlet density and domestic violence. Addiction. 2011;106(5):919-25.

6 Livingston, M. Alcohol outlet density and harm: comparing the impacts on violence and chronic harms. Drug Alcohol Rev. 2011;30(5):515-23.

provisions in the Act to assist their objections to licence applications. Research has clearly shown the difficulties that Councils face when relying on the good order and amenity-related clauses. For example, a review was carried out of several planning decisions by the Victorian Civil and Administrative Tribunal (VCAT) in Australia.⁷ The author of this review found that, in spite of local governments' attempts to use the amenity frame, "the consideration of amenity impacts is often arbitrary and inconsistent, and delivers unpredictable outcomes. Moreover, it is extremely difficult for local governments to present a convincing case with the data they have available" (p.10).⁸ This is especially the case in New Zealand when communities need to demonstrate amenity effects for a new licensed premises which is yet to open; a task which is simply insurmountable.

15. By limiting the ability of particular types of premises (e.g. off-licences) to cluster and trade in close proximity to sensitive sites, the negative impacts of outlets on the wellbeing of our communities can be minimised.⁹ When off-licences in New Zealand cluster close together (particularly in low income areas), competition between outlets has been found to lead to lower prices, longer operating hours and later weekend closing times.¹⁰ This situation concurs with evidence from Australia.¹¹ To address density issues, the adopted LAPs of Waikato District Council, New Plymouth District Council and Stratford District Council include a cap on the total number of bottle stores over the period of the LAP, whilst the Hauraki District Council adopted LAP includes a presumption against the issuing of new off-licences.
16. The most recent data available shows that age-standardised rates of hazardous drinking in the Whanganui DHB area (22.9%) were higher than the national rates of hazardous drinking (17.4%) in 2014. When examined by age group and sex, men had strikingly higher rates of hazardous drinking than women across all groups (Table 1). Of particular concern were the 15-24 year old males in the Whanganui DHB region, of whom 46.7% were classified as hazardous drinkers (compared to 25.4% nationally), while 36% of 25-44 year old males were classified as hazardous drinkers (compared to 20.6% nationally).¹² New Zealand research has shown that young males with hazardous drinking patterns are characterised by typically consuming spirits, across both on-licence and off-

7 Cited in: Streker, P. (2012). Under the influence: What local governments can do to reduce drug and alcohol related harms in their communities. *Prevention Research Quarterly*, No. 19. Australian Drug Foundation: Australia.

8 Ibid.

9 Cameron, M.P., Cochrane, W., Gordon, C., and Livingston, M. (2013). *The Locally-Specific Impacts of Alcohol Outlet Density in the North Island of New Zealand, 2006-2011*, research report commissioned by the Health Promotion Agency, Hamilton: National Institute for Demographic and Economic Analysis, University of Waikato.

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

11 Morrison, C., W.R. Ponicki, and K. Smith, Social disadvantage and exposure to lower priced alcohol in off-premise outlets. *Drug and Alcohol Review*, 2015. 34(4): p. 375-378.

12 Ministry of Health (2015). Regional results from the 2011-2014 New Zealand Health Survey. <http://www.health.govt.nz/publication/regional-results-2011-2014-new-zealand-health-survey>

licence premises.¹³ As such, restrictions to both types of premises is likely to have considerable impact on the drinking patterns of this at-risk population.

Table 1. Hazardous drinking rates in Whanganui District Health Board Area 2011-2014 New Zealand Health Survey (age-standardised)

Age group (yrs)	Male	Female	National (both sexes)
15-24	46.7%	20.1%	25.4%
25-44	36.0%	18.5%	20.6%
45-64	26.5%	5.3%	11.6%
65+	6.8%	0.9%	4.1%
Total	32.6%	13.4%	17.4%

17. Alcohol Healthwatch **recommends** the inclusion of public notification requirements of licence applications within the LAP. We encourage the Council to support community awareness and participation in the licensing process; reflecting a key priority objective of the Sale and Supply of Alcohol Act. We recommend an online notification system, which can include personalised alerts regarding new applications (similar to Auckland Council's use of the online notification system <http://www.alcoholnotices.co.nz/>).

The effects of outlet density on violent offences and motor vehicle accidents in the Whanganui District

18. The hazardous drinking patterns within Whanganui clearly support the need for restrictions on the availability of alcohol within the region.
19. There is also evidence that, within the Whanganui region, alcohol outlet density is associated with increased harm.
20. The risk posed by different types of alcohol outlets varies across territorial authorities¹⁴. This means that, for the same level of outlet density, some areas experience more harm than others. Within exploratory research conducted by Waikato University, the impact of five outlet density measures were assessed in their relationship with violent offences and police-attended motor vehicle accidents in territorial authorities: 1) clubs, e.g. sports clubs, 2) bars and nightclubs, 3) other on-licences, e.g. restaurants, cafés, 4) supermarket and grocery store off-licences, and 5) other off-licences, e.g. bottle stores.
21. The strength of the relationships between outlet density and harm in Whanganui is shown in Figures 1-5. In relation to violent offences, significant relationships **with the density of four of the five outlet measures were evident in the Whanganui District; club licences, bars/nightclubs, other on-licences (e.g. restaurants), and supermarkets and grocery stores.**
22. Figure 1 shows the relationship between club licences and violent offences. Each additional club licence was associated with up to 1.25 additional violent offences per year

13 Wall, M., Casswell, S. (2017) Drinker Types, Harm, and Policy-Related Variables: Results from the 2011 International Alcohol Control Study in New Zealand. *Alcoholism: Clinical and Experimental Research*. 41:5 pp 1044-1053.

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

in rural areas of Whanganui District. In urban Whanganui however the relationship was insignificant (Figure 1).

23. Figure 2 displays the relationship between bar and nightclub licences and violent offences. Each additional bar or nightclub licence was associated with 6.0-9.0 additional violent offences per year in rural areas of Whanganui District (shaded orange). The association varies in areas closer to Whanganui town centre, with each additional bar or nightclub licence associated with up to 6.0 additional violent offences per year (Figure 2).
24. Figure 3 displays the relationship between restaurant and café type on-licences and violent offences. In most of Whanganui District (shaded in red), each additional on-licence type licence was associated with 1.7-4.0 additional violent offences per year. In the north and western part of Whanganui District (shaded in orange), each additional on-licence type was associated with 1.3-1.7 additional violent offences per year (Figure 3).
25. Figure 4 displays the relationship between supermarket and grocery store licences and violent offences. In most of Whanganui district (shaded in light blue), each additional supermarket or grocery licence was associated with 2.5-3.5 additional violent offences each year. In the other parts of Whanganui District (shaded in grey), the relationship was statistically insignificant (Figure 4).

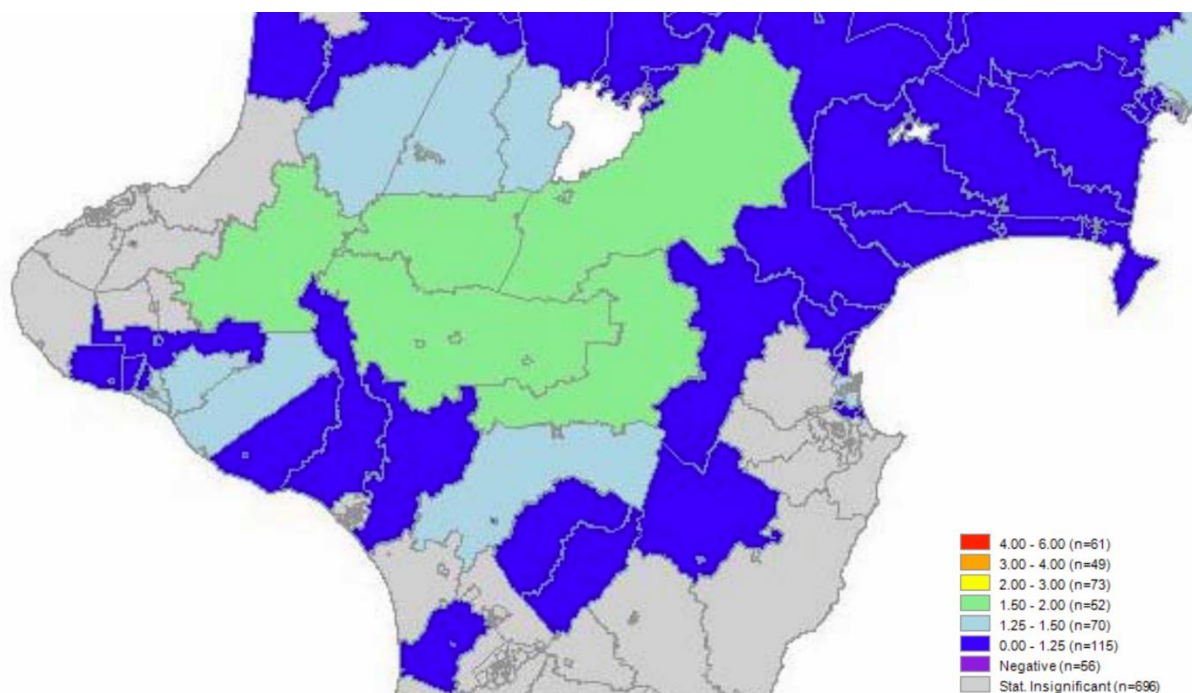


Figure 1: Locally specific point parameter estimates for the relationship between licensed club density and violent offences in the North Island, 2006-2011

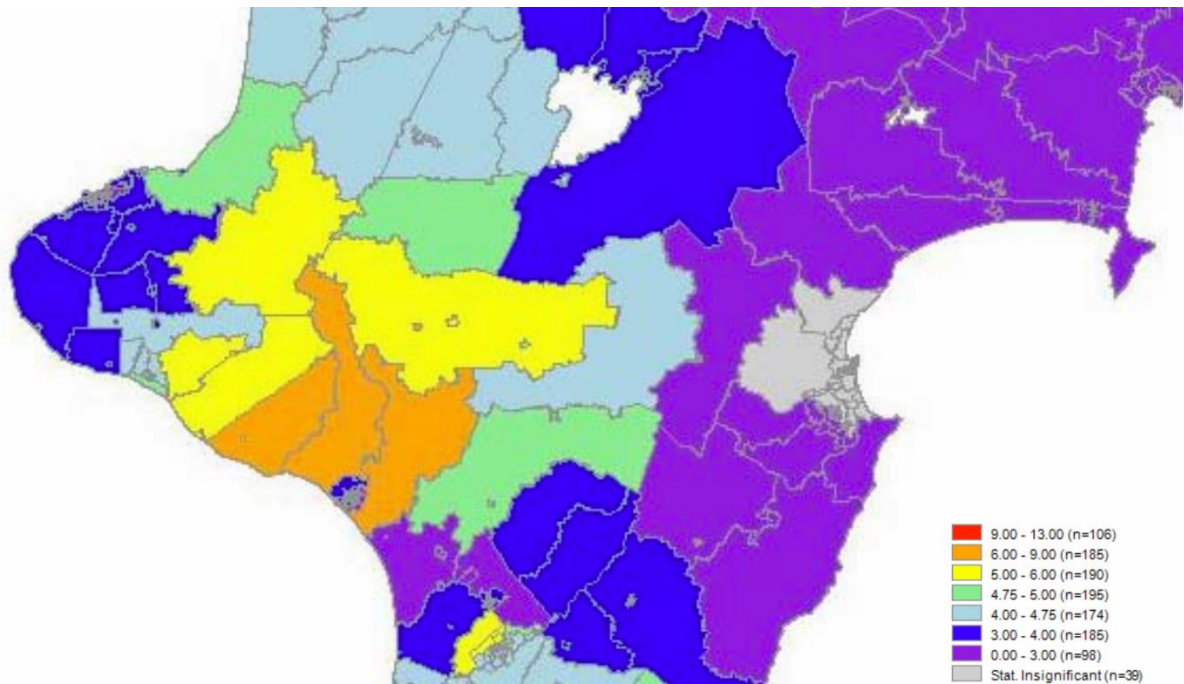


Figure 2: Locally specific point parameter estimates for the relationship between bar and nightclub density and violent offences in the North Island, 2006-2011

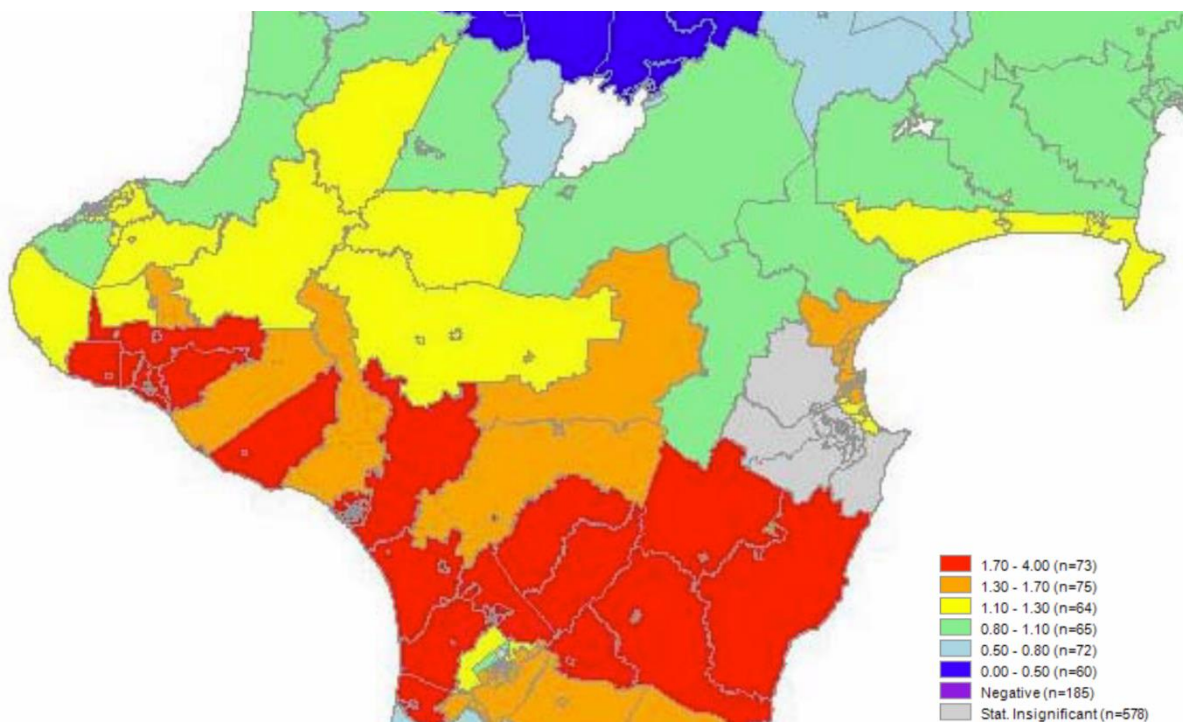


Figure 3: Locally specific point parameter estimates for the relationship between other on-licence density and violent offences in the North Island, 2006-2011

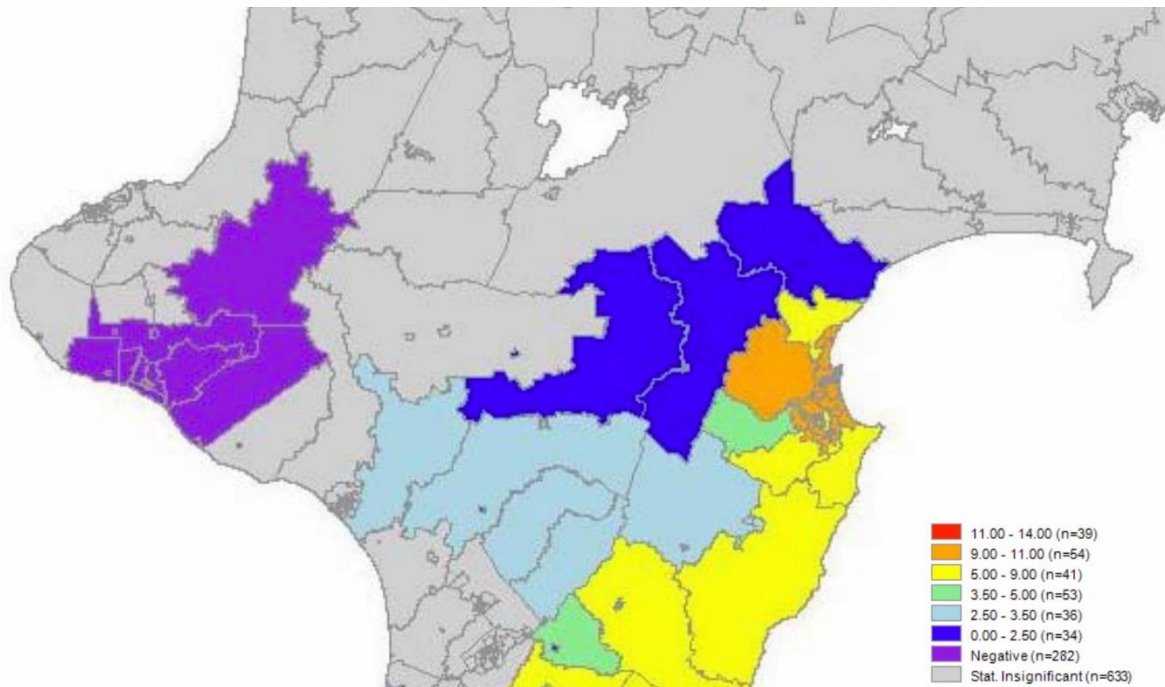


Figure 4: Locally specific point parameter estimates for the relationship between supermarket and grocery store density and violent offences in the North Island, 2006-2011

26. In relation to motor vehicle accidents, significant relationships were found with on-licence types including restaurants and cafes (not bars and taverns). Figure 5 displays the relationship between these licence types and motor vehicle accidents. In Whanganui each additional on-licence type was associated with 0.4-0.6 additional motor vehicle accidents (areas shaded green 0.40-0.45, areas shaded yellow 0.45-0.60, Figure 5).

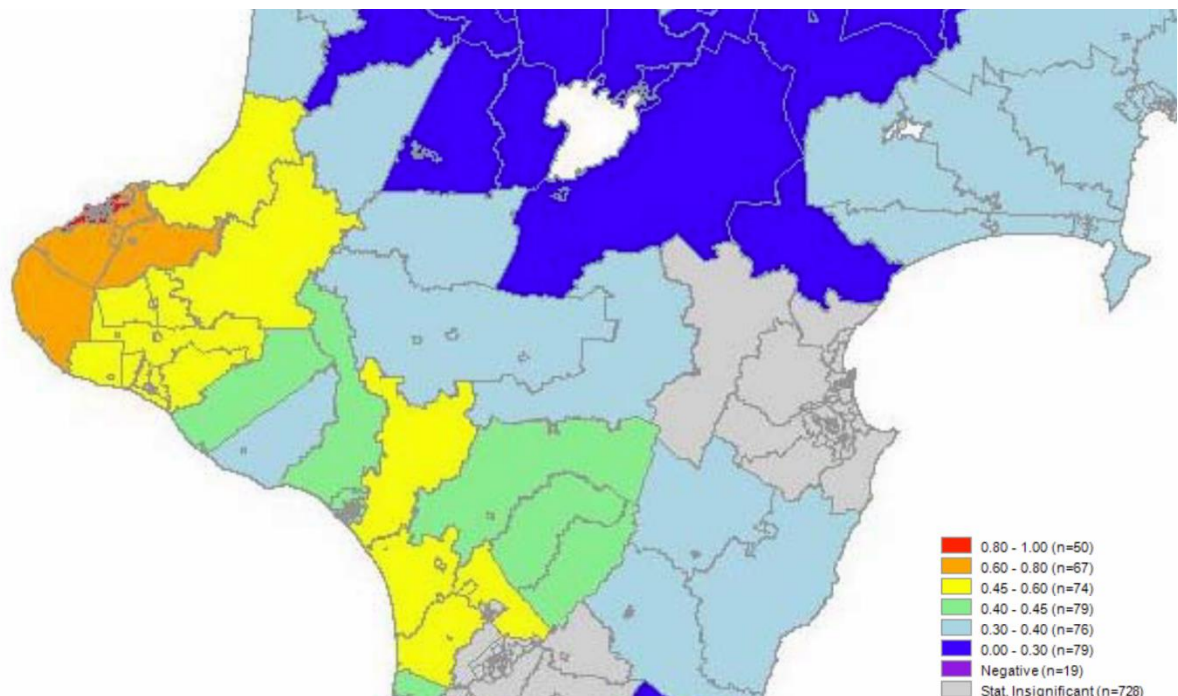


Figure 5: Locally specific point parameter estimates for the relationship between other on-licence density and motor vehicle accidents in the North Island, 2006-2011

27. Although there appears to be no overall relationship between bottle store density and harm, there is likely to be spatial variation within areas. This is because a number of factors have been found to interact with density to produce harm. These include the ethnic composition and socio-economic deprivation of its residents. Certainly, inequalities in harm are clearly evident in New Zealand, whereby Māori populations have more hazardous patterns of drinking¹⁵ than non-Māori New Zealanders, and markedly higher levels of both acute and chronic health harm from alcohol.¹⁶
28. The reasons for this disproportionate level of harm by ethnicity are likely to be varied, but research in New Zealand¹⁷ has demonstrated that alcohol outlets have a disproportionately negative impact on young (aged 15-24 years) Māori and Pacific populations as well as young (15-24 years) European females (when compared to the relevant reference group). This means that for the same level of outlet density in a neighbourhood, the negative effects on risky alcohol consumption are greater for these population groups. As such, an overall effect of outlet density is likely to mask divergent effects for different demographic groups (over and above their level of alcohol use).
29. As shown in Table 2, a greater proportion of Māori residents live in Whanganui District as compared to New Zealand as a whole.

Table 2. Ethnicity profile of Whanganui District and New Zealand (total population).

	Whanganui District	New Zealand
European	77.0%	70.0%
Māori	21.7%	14.1%
Pasifika	2.6%	7.0%
Asian	2.7%	11.1%
MELAA*	0.4%	1.1%
Other	1.8%	1.6%

* Middle Eastern, Latin American and African

30. As detailed previously, socio-economic deprivation also plays a role as an independent risk factor for alcohol harm, over and above the pattern or level of alcohol consumption. In Whanganui District, well over half (57%) of the meshblocks¹⁸ have a deprivation decile between 8 and 10 (Figure 6).

15 Ministry of Health. 2016. Annual Update of Key Results 2015/16: New Zealand Health Survey. Wellington: Ministry of Health.

16 Connor J, Kydd R, Shield K, Rehm J. The burden of disease and injury attributable to alcohol in New Zealanders under 80 years of age: marked disparities by ethnicity and sex. *N Z Med J*. 2015;128:15-28.

17 Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. *Health Place*, 2014;29:186-199.

18 Meshblock: typically 30-60 dwellings

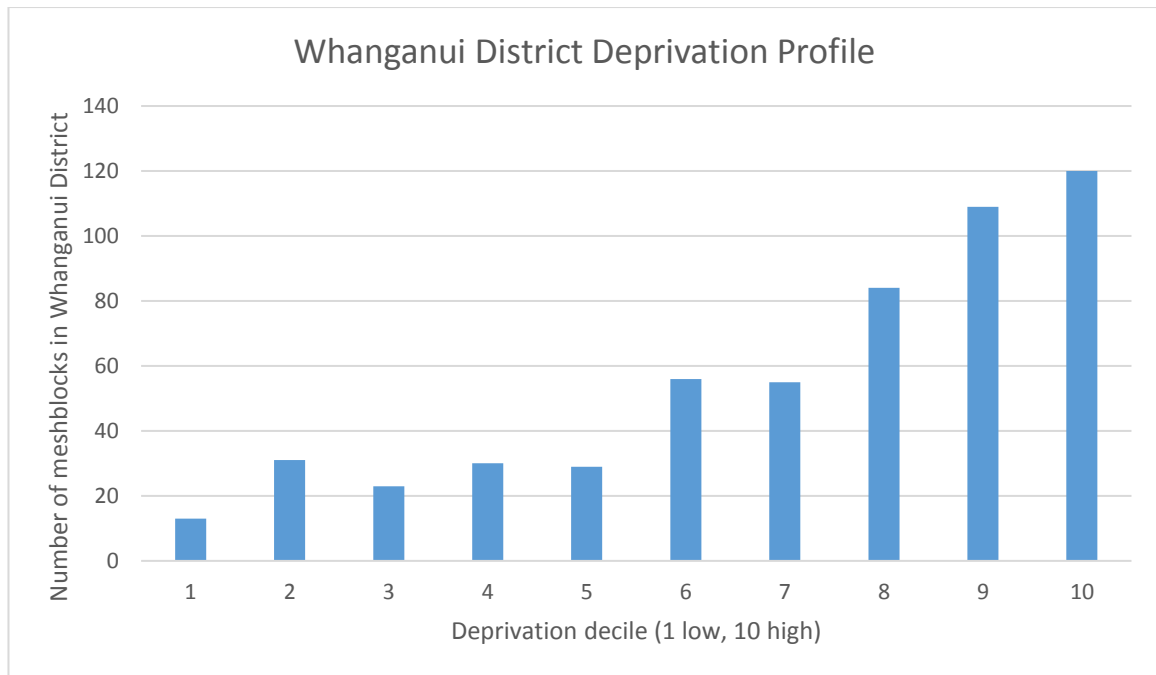


Figure 6. Number of meshblocks in each decile of deprivation in Whanganui District Council.

31. Given the vulnerable populations which reside in the Whanganui region, Alcohol Healthwatch **strongly supports** measures which restrict availability to minimise harm.

One-way door restrictions

32. Alcohol Healthwatch **supports** the use of a one-way door intervention, and recommends that a monitoring and evaluation programme be used to evaluate its effectiveness.
33. Within New Zealand, ALAC (now part of the Health Promotion Agency) conducted an evaluation of the Christchurch one-way-door intervention in 2008¹⁹. The evaluation found that while there was no overall reduction in alcohol-related crime in the inner city, there were reductions in some subsets of crime. It also showed that the one-way door intervention relied on effective working relationships by all parties, including Police and licensees. Additionally, in Dunedin in 2008 approximately 25 inner-city bars took part in a one-way door trial for 3 months, demonstrating a reduction in alcohol-fuelled violence in the central city²⁰. Anecdotal evidence from licensing inspectors and NZ Police also appears to be strong for one-way door policies.
34. Alcohol Healthwatch believes that one-way door restrictions can be a useful tool to have available in a comprehensive policy, and if applied consistently, can help to reduce harm. The approach works by staggering the time that customers leave licensed premises (thereby decreasing crowds of people exiting licensed premises at the same time) and reduce migration between premises (which Police contend is one of the main issues

¹⁹ Law Commission (2010). *Alcohol in our lives: Curbing the Harm. A report on the review of the regulatory framework for the sale and supply of liquor*. Wellington: New Zealand.

²⁰ NZ Police (2009). *Policing Fact Sheet: Licensed premises trading hours*. Prepared by: Organisational Performance Group, Police National Headquarters: Wellington.

confronting them late at night). They may also assist to decrease preloading behaviour. However, on their own and, if inconsistently applied, one-way doors are unlikely to be effective.

35. If one-way door restrictions are implemented, Alcohol Healthwatch **recommends** that they be evaluated. Setting up a monitoring and evaluation project to assess the effectiveness of one-way doors in reducing harm will greatly assist the review of the adopted LAP over the six-year implementation period. Due to their overall mixed effectiveness in the literature, local evidence is needed to ensure that they are contributing to harm reduction outcomes.

Maximum trading hours

36. Alcohol Healthwatch **recommends** that for each licence type, the opening and closing hours be treated as separate elements in the LAP. Both opening and closing hours are likely to have different mechanisms of effect, harming different population groups at different times. Our experience in Provisional LAP appeals is that appellants present different arguments in relation to each, and as such, are best treated separately. This also prevents the Alcohol and Regulatory Authority from having to refer back the entire element (opening and closing hours) to the Council, when the issues at hand may relate more to one or the other.

On-licence

37. Alcohol Healthwatch recognises that the proposed trading hours are more restrictive than the national maximum default hours.
38. Alcohol Healthwatch **does not support** the proposed maximum trading hours of 8am to 2am for on-licences.
39. Alcohol Healthwatch **recommends** that Council strongly consider the hours of 10am to 1am for on-licence taverns, hotels, bars, pubs or nightclubs located inside Whanganui CBD.
40. Alcohol Healthwatch **recommends** that Council strongly consider the hours of 10am to 12am for on-licence taverns, hotel, bars, pub or nightclubs located outside Whanganui CBD.
41. Alcohol Healthwatch **recommends** that Council strongly consider the hours of 10am to 12am for on-licence restaurants to more-closely align with their main purpose or principal business (i.e. selling meals).
42. Currently, three Councils in New Zealand with adopted policies require a 12am closing in suburban areas. A closing hour of 12am for restaurants and cafés can be found within the adopted LAPs of Waitomo District Council and Otorohanga District Council.
43. A consistent and strong body of high-quality evidence has demonstrated the impact of on-licence trading hours on alcohol-related harm. Of the mechanisms available in a LAP, restricting the trading hours of licensed premises is likely to have one of the greatest

impacts on reducing harm.^{21,22} One of the real benefits of reducing the trading hours is that the intervention costs nothing to implement; compared to the expense that host responsibility-type licensing conditions such as increased security, lighting and CCTV cameras can have for businesses.

44. The evidence demonstrates that for every hour of earlier closing, alcohol-related harm is reduced. As the saying goes, “nothing good happens after midnight”. Compared to premises which close at 12am or earlier, the expected rate of offending increases markedly for each additional hour remaining open (1.6 times greater between 12:01am and 1am; 2.2 times greater between 1:01am and 2am; 4.2 times greater between 2:01am and 3am; 8.9 times greater for those closing between 3:01am to 5am). Subsequently, research in Australia has shown that for every hour a venue is open after midnight, there was a 17% increase in drink driving, assaults, and ED attendances.²³

Off-licence

45. Alcohol Healthwatch recognises that the proposed off-licence trading hours are more restrictive than the national maximum default hours.
46. Alcohol Healthwatch **does not support** the proposed off-licence trading hours of 7am to 9pm. For reasons listed below, we recommend maximum trading hours for off-licences be 10am to 9pm. We are also recommending these hours to all of the 67 Territorial Authorities in New Zealand.
47. In regards to the early opening hour of 7am, we believe it is not unreasonable to require an off-licence premises to open after 10am. The purpose of the LAP is to minimise harm; this can be addressed through a reduction in the exposure of alcohol (and its advertising) to children on their journey from home to school.
48. Research has documented the association between exposure to alcohol advertising around schools and intentions to use alcohol among very young adolescents.²⁴ Exposure to in-store displays of alcohol may also predict an increased probability of drinking.²⁵ Existing and new outlets will pose a risk in relation to exposure to alcohol advertising.

21 Babor et al (2010). *Alcohol No Ordinary Commodity: Research and Public Policy*. 2nd ed. Oxford University Press (p.145).

22 Miller, P et al. (2012). *Dealing with Alcohol and the Night Time Economy* (DANTE). Final report. National Drug Law Enforcement Research Fund: Australia. AND Miller, P et al. (2013). *Patron Offending and Intoxication in Night-Time Entertainment Districts* (POINTED). Final report. National Drug Law Enforcement Research Fund: Australia.

23 Chikritzhs et al (2002). The Impact of Later Trading Hours for Australian Public Houses (Hotels) on Levels of Violence. *Journal of Studies on Alcohol and Drugs*. Vol 63:Issue 5.

24 Pasch, K.E., Komro, K.A., Perry, C.L., Hearst, M.O., Farbaksh, K., 2007. Outdoor alcohol advertising near schools: what does it advertise and how is it related to intentions and use of alcohol among young adolescents? *Journal of Studies on Alcohol and Drugs* 68, 587–596.

25 Collins, R. L., Ellickson, P. L., McCaffrey, D., & Hambarsoomians, K. (2007). Early Adolescent Exposure to Alcohol Advertising and Its Relationship to Underage Drinking. *The Journal of Adolescent Health : Official Publication of the Society for Adolescent Medicine*, 40(6), 527–534.
<http://doi.org/10.1016/j.jadohealth.2007.01.002>

49. Protecting the current generation (particularly vulnerable groups such as children) from harm can greatly assist in minimising future harm from alcohol use in the communities of Whanganui. Furthermore, a later opening hour will restrict the accessibility of alcohol to those with an alcohol dependence. Social service providers in New Zealand have previously described the negative impact of early opening hours on persons with alcohol dependence.
50. Presently, many supermarkets in New Zealand are open for their primary source of business (e.g. selling groceries) outside of their licensed hours for the sale of alcohol. As such, a 10am opening trading hour for alcohol in a supermarket that opens at 7am would not be unusual.
51. Alcohol Healthwatch believes that there are many more positive benefits accrued from the later opening hour when compared to any loss of profits from the supermarket sector. Furthermore, economic imperatives regarding the chosen elements included in a LAP (e.g. justifying early opening hours using economic reasons) are not permitted.²⁶
52. Alcohol Healthwatch **strongly supports** the proposed off-licence closing hour of 9pm. New Zealand research has shown that the purchase of alcohol from an off-licence premise after 10pm was approximately twice as likely to be made by heavier drinkers.²⁷ We believe that there is no reason to believe that a 9pm won't offer further protection. International research has also demonstrated significant reductions in alcohol-related hospital admissions (particularly among adolescents and young adults) when off-licence hours are restricted.^{28,29}
53. By adopting a **precautionary approach** within the Whanganui District LAP (see Court of Appeal Decision *My Noodle Ltd vs. Queenstown-Lakes District Council* (2009) and ARLA decision in 2015 PH 129-131 *Foodstuffs North Island Limited, Progressive Enterprises Limited, Super Liquor Holdings Ltd vs. Thames Coromandel District Council*), we believe that a 9pm closing can achieve the object of the Act by minimising harm in Whanganui District. Currently, five Councils in New Zealand with an adopted LAP³⁰ require a 9pm closing.
54. In addition, Alcohol Healthwatch **supports** consistency of trading hours for bottle stores, supermarkets, and grocery stores. It is known that, in New Zealand, approximately 75%

26 B & M Entertainment Ltd., Capital and Coast District Health Board, Foodstuffs North Island Ltd., Wellington Inner City Residents and Business Association Inc., Medical Officer of Health, New Zealand Police, Progressive Enterprises Ltd., Super Liquor Holdings Ltd. versus Wellington City Council. [2015] NZARLA PH 21-28.

27 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):1425-31.

28 Wicki M, Gmel G. Hospital admission rates for alcoholic intoxication after policy changes in the canton of Geneva, Switzerland. *Drug Alcohol Depend.* Nov 1 2011;118(2-3):209-215.

29 Marcus J, Siedler T. Reducing binge drinking? The effect of a ban on late-night off-premise alcohol sales on alcohol-related hospital stays in Germany. *Journal of Public Economics*. 3// 2015;123:55-77.

30 Hauraki District Council, Mackenzie District Council, Timaru District Council, Waimate District Council, Thames-Coromandel District Council

of all alcohol is sold from off-licences (43% from bottle stores, 32% from supermarkets).³¹ Although we do not have the same data available to determine the situation in Whanganui, it is clear that off-licence supply is very important in terms of alcohol harm reduction. Restrictions to the supply of alcohol from these sources is likely to bring about many positive benefits for Whanganui.

Club Licence

55. Alcohol Healthwatch recognises that the proposed club licence trading hours are more restrictive than the national maximum default hours. Our view, supported by strong research, is that club licences pose a risk for alcohol-related harm and should be subject to the same licensing controls and requirements as other on-licences e.g. restaurants.
56. Club licences, in particular those held by sports clubs, have been shown in research (as well as anecdotally) to contribute to the risky drinking behaviours among participants at the club.³² Analysis of Pasifika youth drinking patterns in New Zealand found that participation in a sports team or club outside of school was independently associated with increased risk of binge drinking.³³
57. Figure 1 has also highlighted the significant relationship between club licences and violent offences in the rural areas of Whanganui District. We believe that restrictions on trading hours may offer some protection against the harmful effects of club licences.
58. Alcohol Healthwatch **supports** the proposed closing hour for club licences of 12am. We recommend that clubs should not be permitted to sell alcohol prior to 10am.

Special Licence

59. Alcohol Healthwatch was concerned at the omission of elements relating to special licence trading hours from the Whanganui LAP. We **recommend** a general 12am cease of trading for special licences, in line with our recommendations regarding the trading hours for on-licences. Any extensions beyond this trading hour should not extend beyond the maximum default hours prescribed for on-licences in the national legislation. We suggest that special licences should be granted only for special events rather than an extension of trading hours.

Discretionary conditions

60. Alcohol Healthwatch **supports** the inclusion of discretionary conditions in the LAP. It is important that LAPs provide tools and signals to the DLC so they can work with licensees to reduce alcohol-related harm. We believe that licence conditions can be an effective measure to assist councils to ensure that the sale, supply and consumption of alcohol is undertaken safely and responsibly and that the harm caused by the excessive or inappropriate consumption of alcohol is minimised (as per the object of the Act). However,

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

32 O'Brien, K. (2011). Commentary on Terry-McElrath & O'Malley (2011): Bad sport – exorcizing harmful substances and other problems. *Addiction*, 106, 1866-1867.

33 Teevale, T. et al (2012). Binge drinking and alcohol-related behaviours amongst Pacific youth: a national survey of secondary school students. *New Zealand Medical Journal*, 125:1352, 60-70

there is also evidence showing that these types of interventions are limited in their effectiveness if not accompanied by stronger evidence-based restrictions to the availability of alcohol.³⁴ Research also shows that discretionary conditions are more effective if they are applied in a consistent manner.³⁵

On-licences

61. Alcohol Healthwatch **supports** the inclusion of the proposed discretionary conditions relating to on-licences. We further recommend discretionary conditions regarding minimum numbers of trained security staff and qualified duty managers being on duty at specified hours.

Off-licences

62. Alcohol Healthwatch **supports** the inclusion of discretionary conditions relating to off-licences. We recommend clarification of conditions regarding advertising. We **recommend** that the Council control the amount of alcohol advertising that is visible within 500m from schools and early childcare facilities. For example, the following provision could be included

“An off-licence will not be issued or renewed unless the premises has no more than 2 main external signs, with either a total site coverage not measuring more than 15m2, or the coverage allowed under the District Plan, whichever is lesser”.

63. Similar advertising-related discretionary conditions can be found in the adopted LAPs of Otorohanga District, Thames-Coromandel District, Waipa District, Waikato District, and Waitomo District.
64. Alcohol Healthwatch further **recommends** provisions which restrict the sale of single alcoholic beverages (single sales).
65. Restrictions on single sales can greatly assist compliance with liquor bans in Whanganui District and may reduce pre-loading or side-loading surrounding licensed premises. Research has documented the association between single sales and alcohol-related violence and crime.³⁶ Furthermore, an intervention to reduce single sales was found to reduce rates of alcohol-related ambulance attendances among 15 to 24 year olds.³⁷ Single units of alcohol are likely to be favoured by those who are heavy drinkers and also price sensitive; namely adolescents and young adults, and those with an alcohol dependence. Many licensees in New Zealand have already signed an undertaking not to offer for sale any single alcoholic beverages from their premises.

34 Miller, P et al. (2012). *Dealing with Alcohol and the Night Time Economy* (DANTE). Final report. National Drug Law Enforcement Research Fund: Australia. AND Miller, P et al. (2013). *Patron Offending and Intoxication in Night-Time Entertainment Districts* (POINTED). Final report. National Drug Law Enforcement Research Fund: Australia.

35 Ibid.

36 Parker RN1, McCaffree KJ, Skiles D.. The impact of retail practices on violence: the case of single serve alcohol beverage containers. *Drug Alcohol Rev.* 2011 Sep;30(5):496-504. doi: 10.1111/j.1465-3362.2011.00318.x.

37 Masho, S. W., Bishop, D. L., Edmonds, T., & Farrell, A. D. (2014). Using Surveillance Data to Inform Community Action: The Effect of Alcohol Sale Restrictions on Intentional Injury-related Ambulance Pickups. *Prevention Science*, 15(1), 22–30. <http://doi.org/10.1007/s11121-013-0373-y>

66. A suitable discretionary condition may therefore be:

“The licensee must not sell single units of mainstream beer, cider or RTDs in less than 445ml packaging. Boutique and handcrafted beer and cider are exempt from this provision.”

67. Alcohol Healthwatch also **recommends** requiring the closing of off-licences located near schools during the hours that children leave school. Due to strong community concern regarding the availability of alcohol around schools, some licensees have signed an undertaking to close between 3pm and 4pm. A discretionary condition relating to this approach is recommended in the Whanganui District.

Club licences

68. Alcohol Healthwatch **supports** the discretionary conditions proposed for club licences in the draft policy. In particular, we support the condition which requires the holder of a Manager's Certificate to be present when alcohol is available for sale during busy periods. We recommend further conditions be considered, such as restricting hazardous drinking activities (e.g. player of the day sculling competitions) and limiting the consumption of alcohol to the clubhouse.

Special licences

69. Alcohol Healthwatch **supports** the discretionary conditions proposed for special licences in the draft policy.

Monitoring and Evaluation

70. Alcohol Healthwatch **supports** Whanganui District Council's commitment to the monitoring and evaluation of the LAP. However we recommend broadening the indicators to include drink driving offences, community feedback (regarding a lessening in the burden of licence objections), and feedback from enforcement agencies such as licensing inspectors, Police, and the Medical Officer of Health.

71. We also **recommend** a cautious approach to interpreting monitoring and evaluation data. Changes in reporting practices around alcohol-related Emergency Department presentations for example could indicate a higher number of presentations due to more consistent data collection practices. Some indicators may require a longer lead time before harm reductions become detectable, for example alcohol-related chronic diseases may take a long time to show any change. However, some alcohol related chronic diseases (e.g. gastritis) may be more responsive to short term changes in the regulation of licensed environments.

72. We **recommend** paying particular attention to changes in the rates of hazardous drinking (by age and sex) in Whanganui District. Some population segments, 15-24 year old males for example, have much higher rates of hazardous drinking than the overall rates in Whanganui and across New Zealand.

Conclusion

73. We fully **support** Whanganui District Council in developing a LAP that can be effective in meeting the object of the Sale and Supply of Alcohol Act 2012 in minimising alcohol-related harm. The LAP provision in the Act provides a mechanism that, if used effectively, can reduce alcohol-related harm. However, we strongly believe that for current levels of harm to be minimised in the Whanganui District further evidence-based measures will

need to be included in the policy. If no real reductions in the availability of alcohol occur in Whanganui, the significant burden placed on communities to have their say on licensing matters will remain and the Council will be limited in achieving a reduction in alcohol-related harm.

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-8XLWP-19K7
Date: Monday, 15 May 2017 3:00:58 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-8XLWP-19K7

Attachment: not attached

Title: Miss

Name: Kiri Wilson

E-Mail: kiri@ntota.co.nz

Address

142 Guyton Street
Whanganui 4500

Phone: 0273694840

Organisation: Nga Tai O Te Awa Trust

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: Yes

Gender: Female

Age: 18-29 years

Ethnicity: Maori

Other ethnicity: Eurpoean

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-8YV20-9JL
Date: Monday, 15 May 2017 3:06:41 p.m.
Attachments: [Club submission 2017 LAP.doc](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-8YV20-9JL

Attachment: attached

Title: Mrs

Name: Anita Hodgetts

E-Mail: c.c.club@xtra.co.nz

Address

4 Tennyson Street
Castlecliff
WANGANUI

Phone: 021 766173

Organisation: Castlecliff Club Incorporated

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Neither agree nor disagree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Agree

Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Neither agree nor disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Neither agree nor disagree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

Please refer to attached written submission. Note: Our main issue with the proposal is reducing club's licensing hours which you have failed to add to above choices.

Have you submitted to Council before?: Yes

Gender: Female

Age: over 60 years

Ethnicity: NZ European

Other ethnicity: not supplied

From: Whanganui District Council
To: [!Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-8YWZX-BYZ
Date: Monday, 15 May 2017 3:07:07 p.m.
Attachments: [LAP Submission KPTO.docx](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-8YWZX-BYZ

Attachment: attached

Title: Ms

Name: Alaska Jhenei Dobbs

E-Mail: alaska@ntota.co.nz

Address

142 Guyton St, Whanganui

Phone: 06 3489902

Organisation: Nga Tai o te Awa Trust

Do you wish to speak to Council in support of this submission?: Yes

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Disagree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Neither agree nor disagree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Disagree

Maximum trading hours for restaurants 8am to 12am midnight: Agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Disagree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?
not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 18-29 years

Ethnicity: Maori

Other ethnicity: not supplied

Submission on the proposed Local Alcohol Policy

Introduction

The proposed Local Alcohol Policy aims to provide more regulations on the sale and purchase of Alcohol in the Whanganui District. While this is a positive step forward for our District, this submission will discuss and encourage the Council to strengthen these regulations further, with particular reference to the aim of reducing the prevalence suicide and suicidal behaviour in our community.

Alcohol, Suicide and Whanganui

Alcohol abuse has long been established as being a risk factor for suicide. Robert Kendall discusses the correlation between alcohol and suicide, he observed that:

1. Alcohol and dependence often lead to social decline and social isolation, a potent cause of suicide;
2. Alcohol dependence leads to loss of self-esteem and hence to depression, and these psychological changes predispose to suicide;
3. Intoxication produces increased impulsiveness and a weakening of normal restraints against dangerous behavior; and
4. Alcohol abuse may itself be secondary to, and an attempt to cope with, recurrent episodes of depression.

Alcohol has also been identified as a factor in suicide among non-dependant people. As stated by Leo Sher, “suicide completers have high rates of positive blood alcohol. Intoxicated people are more likely to attempt suicide using more lethal methods. Alcohol may be important in suicides among individuals with no previous psychiatric history”. What this may show, is that those who are experiencing distress and use alcohol, may be more likely to suicide. This is possibly due to lower inhibitions, amplified distress and the lack of ability to rationalize that can be caused by alcohol consumption.

Whanganui is an inherently vulnerable community in terms of risk factors associated with suicide. A large portion of our population live in high deprivation areas and a large portion of this population are Māori and Pacifica. Additionally, the majority of suburban off and on-license premises are located in the suburbs that have the highest deprivation – Castlecliff and Whanganui East. Due to these risk factors, it is our submission that the Whanganui District Council needs to be protective in their approach to the regulation of the sale and supply of alcohol and ensure these regulations are as strong as practicably possible.

There are a total of 37 suburban licenses in Whanganui (this excludes all licenses in the CBD but includes Westmere and Upokongaro). Castlecliff is identified in your research report as a high deprivation area. Castlecliff has 8% of the Districts population, but is home to nearly 22% of the suburban liquor licenses(both off and on-license).

Whanganui East is also identified as being an area of high deprivation. Whanganui East has approximately 13% of the District population, but hosts almost 22% of the Districts liquor licenses (4 off-licenses, 4 club licenses).

In contrast, identified lower deprivation areas have very little if any access to alcohol in their suburb Springvale has a very similar population size to Castlecliff, however holds only 1 club-license that has very limited opening hours. This highlights a drastically disproportionate allocation of licenses and shows that our most vulnerable communities are being targetted by alcohol retailers for their vulnerability and predisposition for alcohol abuse.

The proposed Local Alcohol Policy

It has been identified that when more stringent policies to regulate access to alcohol are introduced, communities subsequently experience less suicides and suicidal behaviour.

In this section, we will submit our suggested changes to the proposed provisions.

The proposed Local Alcohol Policy proposes that:

- 1. the total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded)** (In your research report it states that there are 22 off-licenses currently in Whanganui, rather than 16 as stated in the proposed Local Alcohol Policy).
 - a. It is our position that a total of 16 off-licenses is excessive for our population. This is based on the fact that Gisborne, who has a similar (albeit slightly smaller) population, but has only 11 off-licenses for their District.
 - b. We propose instead that the Council implement a 'sinking lid' policy in terms of off-licenses and set a lower maximum of 13.
 - c. We also propose that the Council considers limiting the amount of off-license premises (more specifically bottle-stores and bars) in the higher deprivation areas (Castlecliff and Whanganui East) to a maximum of 1.
 - d. In the event that there is in actuality 22 off-licenses in Whanganui, then it is our submission that this amount is grossly excessive for the population size and question the rationale behind granting this excessive amount of licenses. Our recommendations, however, remain the same.
- 2. No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded)**
 - a. We encourage the council however, to extend this provision to include the renewal of current licenses to better protect sensitive sites that are currently in unreasonably close proximity to an off license (eg, Whanganui Girls' College, Te Kura Kaupapa Māori o Tūpoho among others). In the event that a off-licenses current license expires, the renewal of this license needs to take in to account its' proximity to sensitive sites. It is not enough to simply prevent any further off-licenses from

being granted near sensitive sites; we need to be proactive in protecting sensitive sites from current exposures to alcohol.

3. **All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours.**
 - a. We are in support of this provision.
 4. **Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day**
 - a. We believe a maximum trading hours of 18 is excessive and is not responsible regulation of access to alcohol.
 - b. It is our position that any reduction from the proposed maximum of 18 is an improvement; however we suggest that a maximum of 14 will be more protective while still reasonable for business owners.
 5. **Maximum trading hours for restaurants 8am to 12am midnight**
 - a. We support this provision.
 6. **Maximum trading hours for supermarkets and grocery stores 7am to 9pm**
 - a. We support this provision.
 7. **Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm**
 - a. We submit that the maximum trading hours for bottle stores, hotels, bars, taverns and wineries be slightly limited than those provided; we encourage the Council to provide that the maximum trading hours for these venues be 9am-9pm.
- 8, 9, 10 and 11. Discretionary conditions may apply to on-licences, off-licenses, club licenses and special licenses.**
- b. We urge that discretionary conditions be applied to current on-license, off-licenses, club licenses and special licenses that are currently within an unreasonable proximity to a sensitive site. We recommend that these discretionary conditions be dependent on the sensitive site that is within its' proximity.

Conclusion

The safe regulation of the sale and supply of alcohol is an important element of creating a community that is responsible and resilient. The Kia Piki te Ora – Suicide Prevention Team at Ngā Tai o te Awa strongly recommends that the Council considers strengthening the proposed regulations further, to provide better protections to our vulnerable communities and to create a atmosphere that promotes healthy and responsible alcohol consumption. This, in turn, will have positive consequences for the mental wellbeing of our community and may result in a reduction of suicides over time.

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-8ZA8M-P5
Date: Monday, 15 May 2017 3:08:39 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-8ZA8M-P5

Attachment: not attached

Title: Ms

Name: Serah Sali

E-Mail: serah.sali@hotmail.com

Address

58 Parsons Street
St Johns Hill

Phone: 022 6828956

Organisation: not supplied

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Strongly agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Strongly agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Strongly agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Strongly agree

Maximum trading hours for restaurants 8am to 12am midnight: Strongly agree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Strongly agree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Strongly agree

Discretionary conditions may apply to on-licences (pg. 10): Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11): Strongly agree

Discretionary conditions may apply to club licences (pg. 11): Strongly agree

Discretionary conditions may apply to special licences (pg. 11): Strongly agree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: Under 18 years

Ethnicity: Asian

Other ethnicity: not supplied



Proposed Local Alcohol Policy Submission

Name: Andrew McDonald
E-Mail: andrew.mcdonald@police.govt.nz
Phone: 063490600
Organisation: New Zealand police
Role: Prevention Manager, Whanganui

Yes we wish to speak to Council in support of this submission

- 1. The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded)**

We agree however our preference is to have supermarkets and grocery stores included in this cap to alleviate small stores being opened up within our community to make alcohol less assessable.

- 2. No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded)**

We agree.

- 3. All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9).**

We strongly agree as this alleviates migration from other premises or private functions that have closed early.

- 4. Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9).**

Strongly agree.

- 5. Maximum trading hours for restaurants 8am to 12am midnight**

We agree

6. **Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9).**

We agree

7. **Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9).**

We agree

8. **Discretionary conditions may apply to on-licences (pg. 10).**

We agree

9. **Discretionary conditions may apply to off-licences (pg. 10-11).**

We agree

10. **Discretionary conditions may apply to club licences (pg. 11).**

We agree

11. **Discretionary conditions may apply to special licences (pg. 11).**

We agree

12. **Do you have any further comments to make?**

New Zealand Police is an important part of the community. We seek to prevent crime and crashes, improve public safety, detect and bring offenders to account, and maintain law and order.

The New Zealand Police are determined to support the Council and the community to reduce alcohol-related harm in Whanganui and to make it a safer place for whanau.

New Zealand Police strongly supports the adoption of the Local Alcohol Policy for Whanganui.

We wish to thank the Whanganui District Council for providing this opportunity to submit on the Whanganui District Proposed Local Alcohol Policy 2017.



Andrew McDonald

Senior Sergeant

Prevention Manager



Keith Thomson

Constable

Whanganui Alcohol Harm Reduction
Officer

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-8ZPRS-UNP
Date: Monday, 15 May 2017 3:10:40 p.m.
Attachments: [LAP Sub PGS.docx](#)

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-8ZPRS-UNP

Attachment: attached

Title: Ms

Name: Alaska Jhenei Dobbs

E-Mail: alaska@ntota.co.nz

Address

142 Guyton St, Whanganui

Phone: 06 3489902

Organisation: Nga Tai o te Awa Trust

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Neither agree nor disagree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Neither agree nor disagree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Neither agree nor disagree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Disagree

Maximum trading hours for restaurants 8am to 12am midnight: Disagree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Neither agree nor disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Disagree

Discretionary conditions may apply to on-licences (pg. 10): Neither agree nor disagree

Discretionary conditions may apply to off-licences (pg. 10-11): Neither agree nor disagree

Discretionary conditions may apply to club licences (pg. 11): Neither agree nor disagree

Discretionary conditions may apply to special licences (pg. 11): Neither agree nor disagree

Do you have any further comments to make?

not supplied

Have you submitted to Council before?: No

Gender: Female

Age: 18-29 years

Ethnicity: Maori

Other ethnicity: not supplied



Submission on the Whanganui District Councils' Draft Local Alcohol Policy

Introduction

The proposed Local Alcohol Policy looks to provide regulations on the sale and supply of alcohol within the Whanganui District. These regulations include restrictions around maximum opening hours for on-license premises; these particular provisions will be the focus of this submission.

Problem Gambling is one of the most unidentifiable addictions and causes a huge amount of harm within the families that it touches. While many of the protective provisions will be addressed in the Class 4 Gaming policy, we are in support of any policy that will restrict access to Class 4 Gaming Rooms as this is likely to have a positive impact (albeit relatively minor) on people experiencing gambling related harm.

Problem Gambling

Problem Gambling affects many families within our community. It is not only the gambler that is affected; it is their families, friends and the wider community also.

Class 4 Gaming Machines have been labelled 'electronic heroin' because of their extremely addictive nature. The music and imagery used in these machines have been selected through scientific trials as being the most successful in inducing users to continue betting. Users have described the sounds as being somewhat hypnotizing, and have admitted that they often use the machines to 'tune out the world' and to escape issues that are happening in their life. Many people find solace in escaping in to the machine and while they are playing, are focussed solely on the machine, quickly becoming addictive and users often spend far beyond their means. The nature of problem gambling means that many individuals and families struggle in silence due to the stigma and shame that is associated with Problem Gambling.

It is our submission that any restrictions placed on the access to Class 4 gaming machines is positive for the reduction of gambling harm in our community. We would be supportive of a more restrictive regime, however it is more appropriate to address this directly in the upcoming Class 4 Gaming policy review. For that reason, this submission will only address access in terms of maximum opening hours for venues with Class 4 gaming rooms such as clubs, taverns and bars.



The proposed Local Alcohol Policy

This section will address only those provisions that concern maximum opening hours for licensed premises.

- 4. Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9)**
 - a. We believe a maximum trading hours of 18 is excessive and is not responsible regulation of access to alcohol (and subsequently access to Gaming machines).
 - b. It is our position that any reduction from the proposed maximum of 18 is an improvement; we strongly encourage the Council to consider reducing the maximum amount of opening hours to 14 (eg. 11am-1am the following day).
- 5. Maximum trading hours for restaurants 8am to 12am midnight**
 - a. We support this provision.
- 6. Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9)**
 - a. We support this provision.
- 7. Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9)**
 - a. We submit that the maximum trading hours for bottle stores, hotels, bars, taverns and wineries be slightly limited than those provided; we encourage the Council to provide that the maximum trading hours for these venues be 9am-9pm.

Conclusion

The reduction of access to Class 4 Gaming machines is important to the reduction of gambling harm within our community. The most efficient way of reducing access to these machines is by reducing access to the venues that hold them. Any reduction in this access will contribute to the overall reduction of gambling harm within our community and is supported by the Problem Gambling Services team at Ngā Tai o te Awa.

PAK'nSAVE

167 Glasgow Street
Box 7048,
Wanganui

Jarvia Company Ltd
Phone (6) 349 1230
Fax (6) 347 1355

15th May 2017

Whanganui District Council

By email: polycysubmissions@whanganui.govt.nz

To whom it may concern,

Submission on the Whanganui District Council Draft Local Alcohol Policy

I believe that the maximum licensed hours for the Whanganui District for supermarkets should be 7am-10pm. I also comment on licence caps and request greater clarity on the discretionary condition that relates to the incident register.

My name is Gareth Jones and I am the owner-operator of Wanganui PAK'nSAVE and have been so since August 2005. Prior to that, the Jones Family operated Write Price in Whanganui for 22 years.

My store employs over 250 full and part-time staff. I am an active member of the community and support many organisations:

We're proud to offer sponsorship and donations to community organisations like sports clubs, church groups, maraes and schools as well as other groups genuinely promoting local community initiatives. For example:

- Cash For Schools 2008, 2010, 2014
- Pak N Save Three Bridges Marathon 2016 - 2018
- Young Business Enterprise Programmes in schools.

I take many steps to ensure all alcohol sold in my store is done so in accordance with the Sale and Supply of Alcohol Act.

Over the 12 years that Wanganui PAK'nSAVE has been operating we have failed a CPO on one occasion and this was on 1st May 2013, where the store sold alcohol to a minor. I have taken the following steps to prevent this happening in the future:

- All alcohol purchase is under a supervisors control lock at the checkouts. Only a checkout supervisor/senior operator is able to authorise any alcohol purchases.
- Daily declaration that checkout operators acknowledge prior to them commencing their shift at the checkout/self scan area.
- Three monthly on the job training and support to staff relating to the sale and supply of alcohol.
- New checkout operators undertake a three monthly training programme where the sale and supply of alcohol is covered throughout this timeframe. This includes a DVD training module and quiz.
- Foodstuffs North Island conduct three monthly mystery shopper review to ensure the store is meeting the obligations under the sale and supply of alcohol.

My store is a franchisee of the Foodstuffs Co-operative and I also support the submissions made by Foodstuffs.

I set out below, for your reference, my current licence and store trading hours and the proposed maximum licensed hours as set out in the Draft LAP:

Opening	Hours	Current Licence Hours	Proposed maximum licensed hours for supermarket
7.00am – 10.00pm		7.00am –to 11.00pm	7.00am to 9.00pm

My supermarket closes at 10.00pm. The proposed hours in the draft LAP would prevent me from selling beer and wine after 9.00pm. I believe that supermarkets should have maximum licensed hours of 7.00am to 10.00pm for the following reasons:

- Council need not be concerned that differing closing times for supermarkets and bottle stores would give an unfair advantage to one type of premises. I do not believe that this is a valid reason that should be considered by the Councils. The Councils should be focusing on the *likelihood of harm* being caused by the differing types of premises. My supermarket cannot sell RTDs or spirits like bottle stores. The products my store sells is less likely to be implicated in the statistics provided by police which include “violence events” and “drunk custodies”. It can only sell beer and wine, and these products are normally purchased as part of a wider grocery shop. In contrast, purchases from specialist liquor outlets will be purchases primarily of alcohol and much more likely to be for immediate consumption and therefore more likely to lead to any public nuisance or harm.
- In reality, prescribing maximum licensed hours to 9pm impacts my shoppers from 8.30pm onwards. It takes time for customers to select their groceries, go through the checkout and to complete the purchase transaction. I believe customers who enter a supermarket from 8.30pm onwards, and who intend to do a full shop, risk not being able to purchase alcohol because they will arrive at the checkout post 9pm. Our checkout staff then have to deal with the frustrations voiced by these customers who wish to purchase beer and wine simply as part of their normal grocery shop.
- There are many reasons why customers choose to shop later in the day including they work during the day, they need to take care of children or they prefer to shop when the store is quieter. I stress I am not primarily concerned on ‘missing out’ on the sale of alcohol between 9pm and 10pm but are much more concerned about the inconvenience that this would cause for my customers who choose to shop later in the day. I do not believe the purchases of beer and wine between the hours of 9pm to 10pm result in undue harm to the community. This is because:
 - Only a very small number of alcohol only purchases are made from my supermarket between 9pm to 10pm – around 0.09% of my store's total weekly transactions.
 - If a customer is purchasing beer and wine during this time period they are much more likely to do this as part of a wider shop.
 - The value of beer and wine purchases made between 9pm to 10pm is also a very small percentage of the value of my supermarket's weekly total items, around 0.02%.

I would invite Councillors and other members of Council preparing the LAP to visit my supermarket after 9pm to observe just how little beer and wine, is in fact, being sold by my supermarket. I would suggest they also visit a specialist bottle store at the same time and contrast the volume and types of alcohol being purchased.

- If my supermarket is prevented in the future by the maximum licensed hours from obtaining a licence to 10pm, the operational inefficiencies that this would create may mean that I decide to close the supermarket an hour earlier, reducing convenience for the community, and this would also decrease the hours of work available to my current employees.
- If there is a clear conflict between my supermarket's opening hours and the hours my store can sell alcohol, significant expenditure would need to be spent putting in place new systems and training staff which will be a strain on my business in terms of both time and money. The overall result may well lead to an increase in grocery prices which I seek to avoid.
- Maximum licensed hours are not the default licence hours that licensees can obtain as a right – the licence hours are set by the licence decision-maker after assessment of the licence application (or renewal application) in accordance with the Sale and Supply of Alcohol Act. I do not believe that there would be many other off-licence holders in the Councils' Districts who would have legitimate reasons for needing a liquor licence to 10pm other than supermarkets and grocery stores which are already open to 10pm.

I support the proposed exemption for existing licensed premises where a new sensitive facility opens in proximity to it under Policy 1.

I further support that proximity restrictions and licence caps which would apply to bottle stores under Policy 2 of the draft LAP, do not apply to supermarkets and grocery stores, or to continuously licensed existing off-licence premises, for example, that change ownership.

It is unclear what the proposed "register of incidents" under Policy 5 that must be made available for inspection would require. Incidents should be defined in the policy or examples given.

Thank you for the opportunity to make this written submission.

Yours sincerely



Gareth Jones

Owner/Operator of JARVIA Company Limited trading as
Wanganui PAK'nSAVE

From: Whanganui District Council
To: [Policy Submissions](#)
Subject: WANG Website - Proposed Local Alcohol Policy submission form ref: WANG-QF-170515-95QPQ-68P
Date: Monday, 15 May 2017 3:38:51 p.m.

WANG Website - Proposed Local Alcohol Policy submission form

Reference: WANG-QF-170515-95QPQ-68P

Attachment: not attached

Title: Miss

Name: Helena Hazelhurst and Rhea Colaabavala

E-Mail: not supplied

Address

-

Phone: not supplied

Organisation: Whanganui District Council Youth Committee

Do you wish to speak to Council in support of this submission?: No

Would you like to be involved in future consultation and are you happy for us to retain your contact details?: Yes

The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded): Agree

No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded): Agree

All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9): Agree

Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9): Agree

Maximum trading hours for restaurants 8am to 12am midnight: Neither agree nor disagree

Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9): Neither agree nor disagree

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9): Neither agree nor disagree

Discretionary conditions may apply to on-licences (pg. 10): Agree

Discretionary conditions may apply to off-licences (pg. 10-11): Agree

Discretionary conditions may apply to club licences (pg. 11): Agree

Discretionary conditions may apply to special licences (pg. 11): Agree

Do you have any further comments to make?

We as the Youth Committee believe that it is vital to have strict conditions around the sale of alcohol

to ensure that everyone stays safe. We agree with all the proposed conditions and cannot see the harm in any of them.

Have you submitted to Council before?: Yes

Gender: Female

Age: Under 18 years

Ethnicity: not supplied

Other ethnicity: not supplied

TE RUNANGA O TUPOHO

Atihaunui - A - Paparangi - Whanganui - Nga Hapu O Tupoho



Proposed Local Alcohol Policy Submission

Name: John Maihi
E-Mail: jnmaihi@gmail.com
Phone: 0272695689
Organisation: Te Runanga O Tupoho
Role:

Yes we wish to speak to Council in support of this submission

- 1. The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded)**

We **strongly agree** however our preference is to have supermarkets and grocery stores included in this cap as we already have a number of small stores opening across the community. These smaller stores increase access, availability and exposure to alcohol from a young age as families pop into the grocery store to get a bread and milk and have to walk past the liquor aisle

- 2. No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded)**

We strongly agree but we would like to add an additional sensitive site to the list – public parks. We know there is already a Liquor Control Bylaw that covers drinking in public parks but we would not like to see a bottle store open up opposite Kowhai Park or any other parks in our community.

- 3. All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9).**

Strongly agree

- 4. Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9).**

Strongly agree however we would like to see this changed to 10am to reduce the exposure to advertising for young people who may be travelling past a tavern, hotel, bar, pub or nightclub on the way to school.

5. Maximum trading hours for restaurants 8am to 12am midnight

Strongly agree

6. Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9).

Strongly agree. The trading hours of supermarkets needs to be in line with bottles stores, hotels, bars and taverns. A study by the Health Promotion Agency in January 2017 Alcohol off-licence purchases and subsequent harm gave a snapshot of purchasing on a Friday and Saturday night in Wellington over 5 weekends.

- 52.9% of the respondents had consumed alcohol before they were surveyed (or prior to the additional purchase at the time)
- 25% of all survey respondents purchased their alcohol from a supermarket or grocery store between 7pm and 11pm.
- 20.8% of all purchases were opportunistic

7. Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9).

Strongly agree

8. Discretionary conditions may apply to on-licences (pg. 10).

Strongly agree

9. Discretionary conditions may apply to off-licences (pg. 10-11).

Strongly agree

10. Discretionary conditions may apply to club licences (pg. 11).

Strongly agree

11. Discretionary conditions may apply to special licences (pg. 11).

Strongly agree

12. Do you have any further comments to make?

We would like to provide some evidence to support our arguments regarding no new off licences within close proximity to sensitive sites. Having young people walk past a bottle shop, tavern, hotel or bar with bill boards and flashy advertising on a regular basis affects their association with alcohol and future purchasing.

Under the influence: Reshaping New Zealand's Drink Culture. The Salvation Army Social Policy and Parliamentary Unity April 2010. The study held 20 focus groups and below is an excerpt from the focus groups on the availability of alcohol

Many focus group participants said that they were influence to drink by attractive advertising and product packaging that promises success and popularity. Another aspect of the advertising is that is makes alcohol look appetising. Good advertising appeals to the senses. Women were also attracted by alcohol advertising, particularly those that showed alcohol to be a sophisticated choice and way of achieving social acceptance.

- Focus group participants were of a view that alcohol advertisements promote the idea that alcohol is cool to drink

- Advertisements often increase awareness of alcohol and consequently trigger the desire to drink. For some, billboards are a big trigger because they attract attention and are visible 24 hours a day. Some participants also found attractive packaging acts as a trigger. The packaging of RTDs (Ready to Drink) was cited as deliberately targeting young teens.

OCTOBER 2014. MINISTERIAL FORUM ON ALCOHOL ADVERTISING & SPONSORSHIP

Early in our discussions it became increasingly clear that the exposure of minors, particularly young children, to alcohol advertising and sponsorship would be a key issue. Our concern mirrored those expressed in a number of the key research papers. Examples of headline findings from some of the more recent studies that influenced our recommendations are listed below:

- frequent exposure to alcohol advertising increases the likelihood of early initiation of drinking alcohol
- increased exposure to alcohol advertising is associated with increased odds of binge drinking
- exposure effects appear cumulative, with levels and frequency of consumption increasing with exposure to advertising messages

We thank you for the opportunity to provide a submission and look forward to hearing from you regarding our verbal submission

Nga mihi

Lauren Tamehana on behalf of Safer Whanganui



Submission by

Hospitality New Zealand Wanganui Branch

to the

Wanganui District Council

Considering

Draft Local Alcohol Policy; Wanganui District Council

15 May 2017

Hospitality New Zealand, Wanganui Branch
P O Box 5156 Terrace End, Palmerston North.

We wish to talk to this submission

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Neville Gorrie
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Local Alcohol Policy Sub: 082

THE WHANGANUI BRANCH OF HOSPITALITY NEW ZEALAND (The Branch) welcomes the opportunity to comment on the Draft Local Alcohol Policy ("The Draft") as Whanganui District Council (The Council) develop its Local Alcohol Policy (LAP) under the Sale and Supply of Alcohol Act 2012 (SASAA).

Hospitality New Zealand (The Association) is a voluntary membership based trade association that represents approximately 2,850 businesses nationwide and comprises predominantly small businesses. Members include restaurants, café bars, taverns, country hotels, motor inns, off-licensed premises and small and large short and long term accommodation providers.

Hospitality is a significant industry and employer in Whanganui.

A survey of Hawkes Bay Branch members a few years ago revealed that they were responsible for supplying 400 commercial accommodation beds and an estimated \$100 Million of economic activity. Over \$36M of this is represented by food supply alone.

A similar survey has not been carried out in Whanganui but we note that the Whanganui branch is approximately half the size of Hawkes Bay and logically would have scalable results.

Hospitality New Zealand provides advice to its members on a wide variety of industry and compliance issues. Service delivery to members is provided through personal visits and telephone and other contact.

Nationally the sale of alcohol is a significant driver of economic activity employing more than 70,000 people working in the food and beverage sector with hospitality the third largest area of spending for tourists. The Branch's member's provide positive employment for an estimated staff of thousands. And the associated downstream industry benefits are almost immeasurable.

Hospitality New Zealand is committed to working with the Council in order to develop a practical and effective Local Alcohol Policy for Gisborne.

Hospitality New Zealand has considered the Draft and provides selected comment gained from its membership as well as commentary from Hospitality New Zealand's position as an industry body for the hospitality industry sector.

If the Council would like further information on any aspects of our submission, or if we can assist further, please do not hesitate to contact us.

LOCATION AND DENSITY

On License

We note that council has shown concern for ensuring the viability of existing businesses and have included grandfather clauses in sections 1 and 2. We applaud this sensible inclusion.

The draft policy contains restriction of new on license developments in proximity to sensitive sites.

We ask that this section is more clearly defined.

- What is proximal and how is it measured (door to door, boundary to boundary, as the crow flies....)?
- Place of worship is not clearly defined, a place of worship can be created easily and in any area without many restrictions. Is this part of the policy aimed at protecting established churches as well as new age and less established modes of worship? If so the impact could reach far beyond intended.
- We note many parishioners may in fact be happy to be located next to a café or restaurant that holds a license.

Off License

This policy places a prohibition on the formation of any new off licence other than a supermarket. We agree with the rationale that bars and restaurants provide a supervised and controlled environment for the consumption of alcohol.

However, it must be noted that supermarkets are responsible for a large amount of New Zealand's Alcohol supply, despite their inability to provide spirits and requirement for single alcohol areas. The specific figures have been held a closely guarded secret and even approached by the law commission and the Government were denied. A web search of Wanganui supermarkets on 15/2/17 revealed that 23% of items on special were alcohol and that many items were on sale to the public at a price lower that could be purchased by a bar directly from the supplier.

If, and when, Whanganui grows as a city the only new access to off license alcohol will be through supermarkets who demonstrably rely on price to promote their alcohol offering.

HOURS; THE SAFEST PLACE TO DRINK IS IN A LICENSED PREMISE

Licensed premises are all governed by very strict licensing laws and the SASAA is even stricter than ever before. Taverns, hotels and restaurants MUST all have very clear host responsibility policies.

Indeed most people dealing with the effects of excessive alcohol agree that is the drinking at home or in public places in uncontrolled environments that cause the vast majority of the problems associated with alcohol consumption.

We note that restaurants Taverns and cafes will have an opening time of 8am. Although we do not encourage early morning drinking on a regular basis we do note that on occasion it is appropriate for restaurants and taverns to be able to serve alcohol with breakfast. Such occasions would include:

- Celebratory Campaign breakfasts
- Post wedding brunches
- Early morning televised sporting events.

❖ **We submit that Restaurants, cafes and Taverns holding an on-license be allowed to trade from 7am.**

We note that the draft contains a closing time of 12pm for clubs. Clubs operate under relaxed licensing laws on the assumption that anyone in a club is there for legitimate club activities and is being looked after by other club members.

❖ **We submit that there is no legitimate reason that clubs should be allowed to trade until the late evening and that a closing time of 10 pm is sufficient to cover any legitimate club activities.**

- ❖ **We Submit that the discretionary condition requiring a club to have a trained qualified duty manager present be made mandatory, further that the number of patrons for that threshold to be met be set at a number that closely reflects the ability of crowds to self-manage.**

OFF LICENSE HOURS

The Alcohol purchased from supermarkets and discount alcohol retail is used in the most destructive manner including excessive unsupervised drinking, side loading, and pre loading.

Although RTDs often receive poor publicity and are labelled with emotional terms such as “alcopops” and “lolly Water” Lion market statistics surprisingly show that the majority of RTDs are in fact Bourbon based and consumed by middle aged trades people. Further, country Hotels provide a service to the community and never promote cheap or heavily discounted alcohol. Purchases of alcohol from Hotel off licenses are almost invariable a convenience rather than an attempt to “get drunk”.

- ❖ **We submit that “Over the Bar” off licenses based in rural Hotels be allowed to trade until midnight**

ONE WAY DOOR RESTRICTIONS (OWD)

As a preventative measure these policies are considered "purely symbolic"¹ and a number of studies have found no evidence that they are effective in reducing alcohol-related harm.² They do however have the potential to significantly harm smaller bars and venues that trade earlier. Further, the Australian version called “lockout” laws have been blamed for the demise of Kings cross.

DISCRETIONARY CONDITIONS

This draft contains many discretionary conditions. The council should be focused on outcomes not on micro managing private business.

Hospitality Businesses despite being the hub of community are not largely profitable. To have unfair staffing or capital expenditure requirements placed on them is likely cause the demise of Hotels and Taverns and is unreasonable.

Any discretionary conditions must be carefully considered and applied only in specifically defined circumstances and have checks and balances to ensure that they do not creep into becoming not under blanket rules.

- ❖ **We submit that a process be clearly defined such including a graduated response to issues before conditions be applied via a formal hearing process thus allowing a licensee time to respond to issues and a chance to be heard before conditions are applied to the license.**

- ❖ **We submit that The Authorities MUST be focused on outcomes NOT on Micro Managing private businesses.**

RELATIONSHIPS

Licensed premises are the backbone of the community. Local taverns are sponsors for the local sports teams and they allow local community groups raise money via raffles and collections and class 4 gambling.

¹ Described as such by Queensland criminologist, Professor Ross Homel of Griffith University, who has extensively researched one-way-door policies (The Age, 2008).

² These include an extensive study into alcohol-related nightlife crime in Australia, *Dealing with alcohol-related harm and the night-time economy* which compared the effectiveness of alcohol-related crime prevention measures introduced between 2005-2010 in New South Wales and Victoria. A KPMG assessment of Melbourne's three-month one-way-door trial (June 2008 to September 2008) found alcohol-related presentations as a proportion of total hospital emergency presentations on Friday and Saturday nights actually increased during the temporary lockout period. Refer also to other sources in the attached *Fact v Fiction* document.

Local Alcohol Policy Sub: 082

Bar and taverns are where people go to catch up with friends and many business deals are done over a pint.

Licensed premises are where relationships and friendships are formed.

We have strongly supported some Councils' investigating the creation of By-Laws to outlaw intoxication in public. It is simply ridiculous that people can be as boozed as they wish and appear in public with absolute impunity but as soon as they enter a bar the licensee is held to account and may even face infringement notices, criminal, and civil prosecution.

If Whanganui City Council is serious about trying address alcohol related harm I strongly urge the council to take an approach that holds individuals accountable for their own poor behaviour and does not penalise an entire industry and the general public.

South Decota took such a progressive and forward thinking stance with their 24/7 sobriety programme for alcohol related offenders. They experienced fantastic demonstrable results. See link below.

<http://apps.sd.gov/atg/dui247/247stats.htm>

We wish to talk to this submission

Submission from the Safer Whanganui Alcohol & Other Drug Reference Group to the Whanganui District Council on the Whanganui District Proposed Local Alcohol Policy 2017

The Safer Whanganui Alcohol & Other Drug Reference Group (AOD Reference Group) is a collaborative network of organisations that represent the continuum of alcohol related harm; from health promotion and prevention through to enforcement and treatment. Membership reflects the diversity of our community and includes intersectional representation from Iwi and Māori providers, Police, local government, NGO's government organisations and other agencies that contribute to the reduction of alcohol and other drug related harm.

As one of the seven reference groups that sit within the Safer Whanganui framework, the group provides leadership, information and direction to the Safer Whanganui Steering Group and the wider Whanganui community on alcohol and other drug related issues; advocating for healthy public health policy that aims to reduce alcohol and other drug related harm.

We wish to also present a verbal submission.

Adopting the Draft LAP

We would like to congratulate the Whanganui District Council on their efforts to improve community input into the local alcohol licensing decisions. We believe that more can be done to minimise alcohol related harm in our communities and adopting a Local Alcohol Policy certainly reflects the intent of the council to keep our community safe. With this in mind, we believe that the best way forward is to adopt the Draft LAP with the following recommendations:

1. We recommend adjusting the maximum trading hours to the hours of 10am - 9pm
2. We recommend supermarkets and grocery stores being included in the cap of new licence holders.
3. We recommend notification requirements for all licence applications be developed and recommend that an online system (with email alert functionality) is used to relieve the burden placed on community members involved in liquor licensing issues in their community. We strongly support a formalised process which includes the Safer Whanganui Alcohol & Other Drugs Reference Group.
4. We support discretionary conditions and further recommend provisions are included which prohibit the sale of single alcoholic drinks and require off-licences to cease alcohol sales when children leave school (i.e. 3-4pm)

We agree with the following parts of the Proposed Local Alcohol Policy:

Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9).

Strongly agree

Discretionary conditions may apply to on-licences (pg. 10).

Strongly agree

Discretionary conditions may apply to off-licences (pg. 10-11).

Strongly agree

Discretionary conditions may apply to club licences (pg. 11).

Strongly agree

Discretionary conditions may apply to special licences (pg. 11).

Strongly agree

The Safer Whanganui Alcohol and Other Drug Reference Group thank you for the opportunity to submit on the Whanganui District Proposed Local Alcohol Policy 2017. As always, we are pleased to have participated in the consultation process.

Mouriora

A handwritten signature in blue ink, appearing to read 'Jay Rerekura', with a stylized, flowing script.

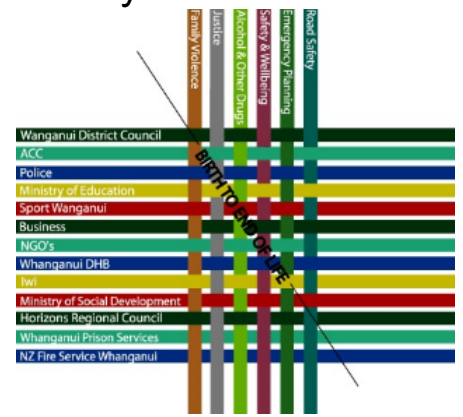
Jay Rerekura

Chair

Safer Whanganui Alcohol and Other Drug Reference Group

Proposed Local Alcohol Policy Submission

Name: Lauren Tamehana
 E-Mail: Lauren.tamehana@whanganui.govt.nz
 Phone: 063493104
 Organisation: Safer Whanganui
 Role: Safer Whanganui Project Leader



Yes we wish to speak to Council in support of this submission

- 1. The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded)**

We **strongly agree** however our preference is to have supermarkets and grocery stores included in this cap as we already have a number of small stores opening across the community. These smaller stores increase access, availability and exposure to alcohol from a young age as families pop into the grocery store to get a bread and milk and have to walk past the liquor aisle.

- 2. No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded)**

We strongly agree but we would like to add an additional sensitive site to the list – public children’s parks. We know there is already a Liquor Control Bylaw that covers drinking in public parks but we would not like to see a bottle store open up opposite Kowhai Park or any other children’s parks in our community.

- 3. All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9).**

Strongly agree

- 4. Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9).**

Strongly agree however we would like to see this changed to 10am to reduce the exposure to advertising for young people who may be travelling past a tavern, hotel, bar, pub or nightclub on the way to school.

- 5. Maximum trading hours for restaurants 8am to 12am midnight**

Strongly agree however like taverns, hotels, bars, pubs or nightclubs we would like Maximum trading hours for restaurants to be changed to 10am opening to reduce exposure to advertising for young people who may be travelling past a restaurant.



6. Maximum trading hours for supermarkets and grocery stores 7am to 9pm (pg. 9).

Strongly agree. The trading hours of supermarkets needs to be in line with bottles stores, hotels, bars and taverns. A study by the Health Promotion Agency in January 2017 Alcohol off-licence purchases and subsequent harm gave a snapshot of purchasing on a Friday and Saturday night in Wellington over 5 weekends.

- 52.9% of the respondents had consumed alcohol before they were surveyed (or prior to the additional purchase at the time)
- 25% of all survey respondents purchased their alcohol from a supermarket or grocery store between 7pm and 11pm.
- 20.8% of all purchases were opportunistic

7. Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9).

Strongly agree

8. Discretionary conditions may apply to on-licences (pg. 10).

Strongly agree

9. Discretionary conditions may apply to off-licences (pg. 10-11).

Strongly agree however we would like to further recommend provisions are included which prohibit the sale of single alcoholic drinks

10. Discretionary conditions may apply to club licences (pg. 11).

Strongly agree

11. Discretionary conditions may apply to special licences (pg. 11).

Strongly agree

12. Do you have any further comments to make?

We would like to provide some evidence to support our arguments regarding no new off licences within close proximity to sensitive sites. Having young people walk past a bottle shop, tavern, hotel or bar with bill boards and flashy advertising on a regular basis affects their association with alcohol and future purchasing.

Under the influence: Reshaping New Zealand's Drink Culture. The Salvation Army Social Policy and Parliamentary Unity April 2010. The study held 20 focus groups and below is an excerpt from the focus groups on the availability of alcohol

Many focus group participants said that they were influence to drink by attractive advertising and product packaging that promises success and popularity. Another aspect of the advertising is that it makes alcohol look appetising. Good advertising appeals to the senses. Women were also attracted by alcohol advertising, particularly those that showed alcohol to be a sophisticated choice and way of achieving social acceptance.

- Focus group participants were of a view that alcohol advertisements promote the idea that alcohol is cool to drink
- Advertisements often increase awareness of alcohol and consequently trigger the desire to drink. For some, billboards are a big trigger because they attract attention and are



visible 24 hours a day. Some participants also found attractive packaging acts as a trigger. The packaging of RTDs (Ready to Drink) was cited as deliberately targeting young teens

OCTOBER 2014. MINISTERIAL FORUM ON ALCOHOL ADVERTISING & SPONSORSHIP

Early in our discussions it became increasingly clear that the exposure of minors, particularly young children, to alcohol advertising and sponsorship would be a key issue. Our concern mirrored those expressed in a number of the key research papers. Examples of headline findings from some of the more recent studies that influenced our recommendations are listed below:

- frequent exposure to alcohol advertising increases the likelihood of early initiation of drinking alcohol
- increased exposure to alcohol advertising is associated with increased odds of binge drinking
- exposure effects appear cumulative, with levels and frequency of consumption increasing with exposure to advertising messages

We thank you for the opportunity to provide a submission and look forward to hearing from you regarding our verbal submission

Nga mihi

Lauren Tamehana on behalf of Safer Whanganui



15 May 2017

Whanganui District Council
PO Box 637
Whanganui 4540

By email policysubmissions@whanganui.govt.nz

Submission on the Whanganui District Council's Draft Local Alcohol Policy

Summary of submission

Foodstuffs is franchisor of the PAK'nSAVE, Gilmours, New World, Four Square and Write Price brands. Foodstuffs is also the ultimate parent of Liquorland Limited which is franchisor of the Liquorland brand. Foodstuffs takes many steps to ensure our stores are responsible retailers of alcohol.

Foodstuffs considers that the maximum off-licence trading hours should be 7am-11pm, but recognises that its stores do not currently operate past 10pm.

The provisions relating to the location and density of off-licences unreasonably penalise off-licences and are unnecessary.

The draft LAP should be drafted clearly to align with the Act and any errors should be amended.

Who we are

The Foodstuffs Co-operatives franchised stores employ more than 30,000 people nationwide across approximately 137 New World, 50 PAK'nSAVE, 274 Four Square stores and other related brands. This extended footprint means we are an integral component of almost all local communities big and small throughout New Zealand.

As a proudly 100% Kiwi owned and operated business, the Foodstuffs Co-operatives have grown from humble beginnings to become New Zealand's biggest grocery distributor, and one of the country's largest organisations. Stores are active members of their communities and as large employers continuously strive to give back by sponsoring and giving support to a wide range of charitable initiatives, sports teams and schools.

Foodstuffs North Island Limited (**Foodstuffs**) is the franchisor of 44 PAK'nSAVE, 98 New World, 183 Four Square, and 7 Gilmours stores. In 2007 Foodstuffs purchased the Liquorland brand and Franchise. The shareholding in Liquorland is ultimately owned by the North Island and the South Island Foodstuffs Co-operatives, Liquorland franchises approximately 110 Liquorland stores nationwide. As a franchise operated business, Liquorland store owners share their own specific local knowledge with a focus on customer service and an emphasis on being involved in the local community. Foodstuffs is also franchisor of the Write Price brand in the North Island. Our stores are a major employer in the Whanganui District Council Region with 7 franchised stores and 1 Liquorland store. Our stores in the Region are as follows:

- Whanganui PAK'nSAVE
- Whanganui New World
- Four Square Castlecliff
- Four Square St Johns
- Four Square Riverview
- Four Square Eastbrook

- Four Square Aramoho
- Liquorland Whanganui

We may in the future open more stores in your Region.

Steps undertaken by Foodstuffs to ensure our stores are responsible retailers of alcohol

Foodstuffs works hard to ensure that it, and every one of its stores, is a responsible seller of alcohol. As a business, we ensure our stores understand fully their obligations under the current legislation regarding the sale of liquor.

Before a new employee can sell alcohol to customers, they must complete induction training which teaches the employee about their responsibilities under the Sale and Supply of Alcohol Act 2012 (**Act**). All employees must then undertake refresher courses which they must pass. There are voluntary online courses which store owners can recommend to their staff and, on occasion, Foodstuffs may require employees to complete this online course in addition to their mandatory training. After receiving training, staff are required to sign an acknowledgement stating that they understand their obligations under the Act.

All duty managers and operation managers are required to carry out their Licence Controller Qualification and Foodstuffs requires that all stores have at least two people employed with their General Manager's Certificate, with supermarkets having a much larger number than this.

Our point of sale systems prompt the verification of age when an alcohol product is scanned. All stores have an "Under 25: ID required" policy which requires anyone who looks under the age of 25 to provide proof of their age. All stores also apply a 'party' rule where if any person in a group purchasing alcohol looks under 25, and this person doesn't have ID proving that they are old enough to purchase alcohol, then alcohol will not be sold to anyone in the group.

Additionally, we have an independent programme in place where all of our stores are 'mystery shopped' to ensure proof of age compliance is being adhered to. There are heavy penalties for liquor audit fails (both internal and 'police stings'), which include fines, additional training programmes and referring repeat offenders to our Board of Directors which can result in a store owner's franchise agreement with Foodstuffs being terminated.

Due to the seriousness of the consequences of a liquor audit failure, our store owners are vigilant in ensuring that the Act is adhered to, in particular complying with store single alcohol area conditions and the prohibitions on supply to minors and intoxicated persons.

Foodstuffs' submissions

Foodstuffs commends the Council on having produced a Local Alcohol Policy which seeks to balance the needs of the community, local business and other key stakeholders such as the Police and Medical Officers of Health, who each have differing perspectives and views on alcohol in the community.

Foodstuffs appreciates the opportunity to provide feedback on the draft LAP.

Proposed maximum off-licence hours

We set out below for your reference the current store trading hours for our stores in your Region.

Store	Store opening hours (week days maximum)	
Whangarei PAK'nSAVE	7am	10pm

Store	Store opening hours (week days maximum)	
Whanganui New World	7am	9pm
Four Square Castlecliff	7am	7pm
Four Square St Johns	6.30am	7pm
Four Square Riverview	7am	8pm
Four Square Eastbrook	7am	7pm
Four Square Aramoho	7am	7pm
Liquorland Whanganui	8am	10pm

Morning hours

The draft LAP proposes that the maximum licensed hours for all off-licences in the Whanganui District will commence at 7am. We support this proposal. It covers all of our stores' existing morning hours and we are unaware of any research that shows that further restricting the morning hours for off-licences reduces alcohol-related harm.

Evening hours

The draft LAP proposes that maximum trading hours for all off-licences in the Whanganui District will conclude at 9pm. This proposal does not cover the current trading hours for all of Foodstuffs stores in the Whanganui District.

Ideally, Foodstuffs would like to see the maximum trading hours for the Whanganui District extended to 11pm.

This is because maximum licensed hours are not the default licence hours that licensees can obtain as a right – the licence hours are set by the licence decision-maker after assessment of the licence application (or renewal application) in accordance with the Act. We do not believe there would be many off-licence holders who would have legitimate reasons for needing a liquor licence to 11pm, and we value the flexibility that allows legitimate and scrupulous off-licence holders to apply for such a licence if future growth in the Whanganui District indicated that customers would benefit from this. In addition, we believe that there are many valid reasons for distinguishing supermarkets and grocery stores from other types of off-licences.

We believe that the Council should consider the likelihood of harm being caused by the differing types of premises. Most sales of alcohol from our supermarkets and grocery stores occur when a customer is purchasing alcohol as part of a wider grocery shop. Our supermarkets and grocery stores can only sell beer and wine, they cannot sell RTDs or spirits, and they will also be subject to a 'single-area condition' limiting the location of alcohol in the store to a particular defined area.

In addition, Foodstuffs understands that there is no definitive evidence that restricting off-licence trading hours reduces alcohol-related harm (even for the evening hours).¹ This is most likely to be

¹ A recent report produced for the SHORE and Whariki Research Centre in the College of Health at Massey University found that across New Zealand, 'There was no impact of the introduction of the national maximum trading hours for assaults related to take away outlets (hours restricted to 7am to 11pm)': Tasia Huckle and others. *Effects of restricting hours for on-premise and take away alcohol outlets in New Zealand*. Paper

because many purchasers of off-licence alcohol shift their purchases to times earlier in the day. Unlike with on-licence alcohol purchases (that must be consumed at the on-licence), there is no direct temporal link between the purchase of off-licence alcohol and its consumption.

However, Foodstuffs recognises that we currently do not have any stores in the Horowhenua District operating beyond 10pm.

District-wide cap on off-licensed premises

Clause 2 of the draft LAP would place a cap on the number of off-licences permitted in the Whanganui District, set at the total number of off-licences in the area at the time the policy is adopted, but excluding supermarkets, grocery stores and any existing off-licensed premises that remain continuously licensed.

Although Foodstuffs commends the Council for recognising that different kinds of off-licensed premises contribute differently to alcohol-related harm in a region, Foodstuffs notes that there is no universally consistent evidence that connects off-licence density (of all types) to alcohol-related harm or any particular types of harm. A much stronger correlation may in fact be drawn between on-licence density and alcohol-related harm.²

In addition, placing an inflexible cap on the number of off-licences permitted in an area does not allow for licence applications where the Applicant can show that they will not add to alcohol-related harm in the area and would also constrain the ability of that area to develop in response to changes, including changes in demographics and city planning.

The Act already requires District Licensing Committees to consider, when deciding whether or not to issue a licence, the likely effects of a new licence, including by reference to the harm minimisation objective of the Act and also on the amenity and good order of the locality (sections 105(h) and 105(i) of the Act). This involves consideration of the density of alcohol outlets in an area and allows the Committee the flexibility to consider the specific impact of different types of off-licences, the needs and circumstances relevant to each particular location and also the specifics of the particular application including the nature of the particular premises and the suitability of the particular licensee.

We therefore consider clause 2 of the draft LAP (as it relates to the maximum number of off-licences in the Whanganui District) is unreasonable in light of the object of the Act. Foodstuffs considers that there should be an exception to this provision stating:

...unless it can be demonstrated to the District Licensing Committee that the external alcohol-related signage or operation of the premises will have no significant impact on alcohol-related harm in the Whanganui District.

Clear drafting

Foodstuffs considers that clarity of drafting is important. Clear drafting provides certainty for both the decision-maker and the applicant when it comes to understanding the impact of a local alcohol policy on an applicant's off-licence application. This avoids disputes about the proper interpretation of a local alcohol policy.

Even without the addition of the wording *above*, we would suggest re-wording clause 2 to read:

presented at a Plenary Session at the 42nd Annual Alcohol Epidemiology Symposium of the Kettil Bruun Society, Stockholm May 30- June 3, 2016 at page 15.

² Above n 1, at 14 - 15. See also, M.P Cameron & others *The Locally Specific Impacts of Alcohol Outlet Density in the North Island of New Zealand 2006 - 2011: Research report commissioned by the Health Promotion Agency* (Wellington, July 2013) at pp 17 - 27.

The District Licensing Committee should not issue any further off-licences in the Whanganui District where this would increase the total number of off-licences in the Whanganui District to more than the total number of off-licences existing at the time this policy is adopted. This cap does not apply to Supermarkets and Grocery Stores, nor to any existing off-licensed premises that remain continuously licensed.

We also suggest adding a definitions section for defined terms such as Supermarkets, Grocery Stores, Early Childhood Centres, and Primary and Secondary Schools.

Location of licensed premises to be considered in line with sensitive locations

Clause 1 of the draft LAP provides that no new off-licence applications (with the exception of supermarkets and grocery stores) will be granted where that off-licence premises is determined by the District Licensing Committee to be within close proximity to certain specified sensitive sites.

While Foodstuffs commends the Council again for recognising the significant differences between types and kinds of licences and their impacts on sensitive sites, as outlined above, Foodstuffs notes that the decision-maker is required by the Act to have regard to the likely effects of a new licence, including on the amenity and good order of the locality. A blanket approach does not allow for licence applications where the Applicant can show that they will not have a significant alcohol-related impact on sensitive sites in the locality.

In addition, the reference to 'within close proximity' is unreasonably vague as it does not provide reasonable guidance to the decision-maker or the applicant when considering the effect of the provision. Rather, the provision suggests that 'close proximity' will be determined by reference only to the decision-maker's opinion and based on any considerations the decision-maker may choose to take into account. This is likely to reduce consistency between decisions and reduce the ability of applicants to plan effectively.

New Licence applications

When there is a change in ownership of a Foodstuffs store, the new owner must apply for a new off-licence, despite the fact that the previous owner has a licence for the store. In this situation, the application of clause 1 has the potential to unfairly prejudice the new owner. Foodstuffs therefore considers that 'new licence applications' should exclude existing licensed premises that remain continuously licensed.

Clear drafting

Foodstuffs also notes that clause 1 of the draft LAP is confusingly drafted. We suggest that 'will be granted as determined by the District Licensing Committee to be within...' should (aside from the recommendations noted above) be amended to 'will be granted for premises that the District Licensing Committee determines to be within...'.

Foodstuffs therefore considers that clause 1, as currently drafted, is unreasonable in the light of the object of the Act. If the Council feels that it would assist, Foodstuffs is open to suggesting alternative wording for clause 1 of the draft LAP, for Council's consideration.

Discretionary conditions

Clause 5 of the draft LAP provides for particular discretionary conditions that may apply to off-licences. However, Foodstuffs notes that these conditions may be considered by a District Licensing Committee pursuant to sections 109, 117 and 133(2) of the Act, not section 116 of the Act.

Clear drafting

Foodstuffs suggests the following amendments for clarity and to ensure that the discretionary conditions outlined in the draft LAP are clearly identified as relating to the sale and supply of alcohol:

Restrictions on the advertisement or display of alcohol-related signage to ensure that at least 50% of any store front glazing allows for visibility from outside the premises.

Alcohol-related advertisements, signage and display is to be consistent with Crime Prevention through environmental design (CPTED) guidelines.

The licensee is required to maintain a register of significant alcohol-related incidents that is available for inspection by enforcement authorities at any time during trading hours.

Presenting submission in person

Once again, Foodstuffs is grateful for the opportunity to make this written submission. We would also like the opportunity to present our submission in person, together with a number of our franchisees.

Regards

Angela Dimery

Solicitor

FOODSTUFFS

NORTH ISLAND LIMITED

DD: (09) 621 0703 | M: 021 191 0346 | E: angela.dimery@foodstuffs.co.nz

Support Centre, 60 Roma Road, Mt Roskill, Auckland 1440, New Zealand
DX Box CX 15021 or PO Box 27480 Mount Roskill, Auckland 1440, New Zealand

From: [Marianne Cavanagh](#)
To: [Leayne Huirua](#); [Alex Staric](#)
Subject: FW: Lap submissions
Date: Monday, 15 May 2017 4:48:28 p.m.
Attachments: [image001.png](#)

Copy of submission for pdfing that didn't come through to our inbox form the online database

From: Cass Alexander
Sent: Monday, 15 May 2017 4:36 p.m.
To: Marianne Cavanagh <Marianne.Cavanagh@whanganui.govt.nz>
Subject: RE: Lap submissions

Title	Ms
DCCOVID	
Name	Barbara Milson
E-Mail	
Address	21 Willis St
Phone	
Organisation	
Do you wish to speak to Council in support of this submission?	No
Would you like to be involved in future consultation and are you happy for us to retain your contact details?	No
The total number of off-licences (bottle stores, hotels, bars, taverns, and wineries) will be limited to the total number of off-licences at the time the draft Local Alcohol Policy is adopted (currently at 16). (supermarkets and grocery stores excluded)	Strongly agree
No new off-licences (bottle stores, hotels, bars, taverns, and wineries) will be granted if in close proximity to a sensitive site defined as an early childhood centres, schools, Marae, and places of worship (supermarkets / grocery stores excluded)	Strongly agree
All taverns, bars, pubs, and night-clubs are required to have a one-way door restriction in effect from one hour prior to licence closing hours (pg. 9).	Strongly agree
Maximum trading hours for taverns, hotels, bar, pubs, or night-clubs 8am to 2am the following day (pg. 9).	Strongly agree
Maximum trading hours for restaurants 8am to 12am midnight	Strongly agree
Maximum trading hours for supermarkets and grocery stores 7am to 5pm (pg. 9).	Strongly agree
Maximum trading hours for bottle stores, hotels, bars, taverns, and wineries 7am to 9pm (pg. 9).	Strongly agree
Discretionary conditions may apply to on-licences (pg. 10).	Strongly agree
Discretionary conditions may apply to off-licences (pg. 10-11).	Strongly agree
Discretionary conditions may apply to club licences (pg. 11).	Strongly agree
Discretionary conditions may apply to special licences (pg. 11).	Strongly agree
Do you have any further comments to make?	
Have you submitted to Council before?	No
Gender	Female
Age	over 60 years
Ethnicity	NZ European
Other ethnicity	
Created at 20/04/2017 4:35 p.m. by: System Account Last modified at 20/04/2017 4:35 p.m. by: System Account	

From: Marianne Cavanagh
Sent: Monday, 15 May 2017 4:28 p.m.
To: Cass Alexander <Cass.Alexander@whanganui.govt.nz>; Leayne Huirua <Leayne.Huirua@whanganui.govt.nz>
Subject: RE: Lap submissions

We got Chester's through but nothing from Barbara Milson. Are you able to do a screen grab for her one please?
thanks

From: Cass Alexander
Sent: Monday, 15 May 2017 4:16 p.m.
To: Marianne Cavanagh <Marianne.Cavanagh@whanganui.govt.nz>; Leayne Huirua <Leayne.Huirua@whanganui.govt.nz>
Subject: Lap submissions

It looks like Chester Penafior and Barbara Milson are the people who did not get numbers generated

Otherwise I think everyone else did

Cass

Cass Alexander | [Communications Officer](#)

OUR VALUES
Positive & Encouraging | Collaborative Brilliance | Make Great Happen



Please address all Correspondence to:

Office Admin,
St. John's Club Inc
PO Box 7077,
Wanganui, 4500
Email: info@stjohnsclub.co.nz

158 Glasgow Street
Central
Wanganui

Submission to Local Alcohol Policy

Main issues for clubs;

- Proposed reduction in Club Licence trading to 12 am midnight close.

Key arguments supporting our case;

- We acknowledge that the availability of Alcohol has associated harm in the community that should be managed. This is the object of the Sale and Supply of Alcohol Act 2012.
- The act allows for the Council to adopt a LAP, and there may be some situations where this is an advantage to minimise harm in our local community.
- Any proposals adopted into the LAP should be based on evidence that they will address problem areas. There seems little evidence that requiring clubs to close at 12 midnight while other establishments can continue to trade until later, will address the problem areas identified.
- Our Chartered Club sells alcohol, and deals with the same problems and requirements as any other licensed establishment. Therefore we believe we should be treated the same, particularly as regards to licensed hours. (the proposal expects clubs to finish trade at 12 midnight while many other outlets trading under an on licence can trade until 2am).
- We are not seeking to extend our licensed hours, just to maintain the hours we currently have.
- Our club provides many social and sporting and club events for our members and guests. Some of these extend to after 12midnight on occasions and being able to serve alcohol responsibly compliments these activities and adds to the enjoyment of many of the participants.
- Our club is community minded. We provide support both financially and in providing facilities to community groups, local sport, schools etc. We like to be a positive influence in our community.