

Statement of
Proposal:

**Local Alcohol
Policy 2025**





In February 2019, Rotorua Lakes Council (Council) adopted its Local Alcohol Policy 2019 (LAP 2019).

The LAP 2019 was made under the Sale and Supply of Alcohol Act 2012 (the Act), which allows the Council to apply policies to manage the sale, supply and consumption of alcohol in a safe and responsible manner and to minimise any harm caused because of excessive or inappropriate consumption of alcohol in its district.

In accordance with section 97 of the Act, the LAP 2019 has been reviewed. The key findings are:

- Rotorua is a highly deprived area¹ and therefore more susceptible to the harms of alcohol.
- Data supplied by NZ Police demonstrates that alcohol-related harm in Rotorua is high, particularly alcohol-related family harm and drink driving.
- Data provided by Te Whatu Ora demonstrates that Rotorua residents are more likely to attend a hospital due to chronic use of alcohol compared to the NZ average.
- Alcohol-related harm generally peaks during the night to the early hours of the morning.
- The community alcohol survey demonstrated that 76% (~455 people) of respondents felt excessive and inappropriate consumption of alcohol was harming the quality of life in our district.
- During pre-consultation engagement with key stakeholders many expressed a particular concern around the availability and accessibility of alcohol in Rotorua and particularly from off-licences.

As a consequence, the Council is proposing to update the policy and adopt a Local Alcohol Policy 2025. The proposed key policies of the Local Alcohol Policy 2025 are that:

- there will be a temporary freeze on issuing any new off-licences for 3 years and a presumption against issuing any new off-licences thereafter;
- off-licence trading hours be reduced to 7.00am to 9.00pm;
- the delivery of alcohol from off-licences and remote sellers be reduced to 7.00am to 9.00pm;
- new off-licences will need to conduct pre-application engagement with sensitive facilities within 200m;
- retaining the current discretionary conditions and adding further discretionary conditions for consideration for application to off-licences;
- on-licence trading hours within the Inner City be reduced to 8:00am to 2:00am the following day and on-licence trading hours outside the Inner City will remain 8.00am to 1.00am the following day;
- retaining the current discretionary conditions for on-licences, and
- club and special licences to remain unchanged.

Before making any final decisions, we'd like to have your input. Your views are vital to the success of the Local Alcohol Policy 2025. Therefore, we would like to invite you to provide submissions on the proposed updates for the LAP 2025 to assist the Council in the decision-making process.

¹ *University of Otago, Socioeconomic Deprivation Indexes: NZDep and NZiDep, Department of Public Health. Accessed: January 2025. Available at: Socioeconomic Deprivation Indexes: NZDep and NZiDep, Health Inequalities Research Programme (HIRP), University of Otago, Wellington | University of Otago*

The purpose of this Statement of Proposal is to seek public feedback on Rotorua Lakes Council's proposed Local Alcohol Policy 2025, which aims to regulate the sale, supply and consumption of alcohol within the district.

This proposal is made under the Sale and Supply of Alcohol Act 2012 (the Act), which provides local authorities with the ability to develop local alcohol policies tailored to the needs and context of their communities. A Local Alcohol Policy is an essential tool in managing alcohol-related harm and ensuring that the sale and supply of alcohol in the Rotorua District aligns with the social, cultural and environmental aspirations of the District.

In February 2019, Rotorua Lakes Council (Council) adopted its current Local Alcohol Policy 2019 (LAP 2019) under the Act. In accordance with section 97 of the Act, the LAP 2019 has been reviewed and, as a consequence, the Council is proposing to update that Policy and adopt a Local Alcohol Policy 2025.

This Statement of Proposal sets out:

- The purpose and effect of a Local Alcohol Policy;
- The Local Alcohol Policy Review 2024/2025;
- The reasons for producing the Local Alcohol Policy 2025;
- The proposed Local Alcohol Policy 2025;
- Instructions on how to make a submission; and
- A submission form.

Feedback



A form to provide your feedback can be found towards the end of this document.



TE TAKE ME TE HUA O TĒTEHI KAUPAPA HERE WAIPIRO Ā-ROHE THE PURPOSE AND EFFECT OF A LOCAL ALCOHOL POLICY

The Rotorua District is known for its rich cultural heritage, tourism and vibrant local community. As a popular tourist destination and home to a significant Māori population, the district faces unique challenges and opportunities in managing alcohol-related harm.

The objective of the Act is to provide for the sale, supply and consumption of alcohol in a safe and responsible manner and to minimise any harm caused because of excessive or inappropriate consumption of alcohol.

The Act enables communities to have a greater say about when, where and how alcohol is sold in their area through the development and adoption of local alcohol policies. A well-designed local alcohol policy can play a significant role in mitigating adverse health and social outcomes while promoting safe and responsible drinking practices across the community. A local alcohol policy is a set of policies made by a council, in consultation with its community, relating to the licensing of the sale, supply and consumption of alcohol within its District.

The Act specifies what can be included in a local alcohol policy and what information the Council must have regard to when producing a local alcohol policy. A local alcohol policy may include policies on any or all of the following matters relating to licensing (and no others):

- a. location of licensed premises by reference to broad areas:
- b. location of licensed premises by reference to proximity to premises of a particular kind or kinds:
- c. location of licensed premises by reference to proximity to facilities of a particular kind or kinds:
- d. whether further licences (or licences of a particular kind or kinds) should be issued for premises in the district concerned, or any stated part of the district:
- e. maximum trading hours:
- f. the issue of licences, or licences of a particular kind or kinds, subject to discretionary conditions:
- g. one-way door restrictions.

A local alcohol policy must not include policies on any matter not relating to licensing.

Once adopted and in effect, regard must be had by the District Licensing Committee ('DLC') and the Alcohol Regulatory and Licensing Authority ('ARLA') to the local alcohol policy in deciding whether to issue, vary or renew any alcohol licence in the district (sections 105, 120 and 131 of the Act). Furthermore, the DLC or ARLA may refuse to issue, vary or renew a licence if the consequences would be inconsistent with the LAP (sections 108, 120 and 133 of the Act) or issue, vary or renew a licence subject to particular conditions (sections 109, 120 and 133 of the Act).



In February 2019, the Council adopted its LAP 2019. In accordance with section 97 of the Act, a Local Alcohol Policy, once adopted, must be reviewed within six years of its adoption. The Council has conducted a review of its current policy to assess its effectiveness.

A Rotorua Lakes Council 'Local Alcohol Policy Review Research Report 2025' (LAP Research Report 2025) was prepared to support the review and is published alongside this Statement of Proposal.

Further supporting information was provided by the Police, the Medical Officer of Health, Alcohol Inspectors, the results of a community survey and other engagement information.

Section 78 of the Act specifically requires Councils, when producing a local alcohol policy, to have regard to:

- a. the objectives and policies of its district plan;
- b. the number of licences of each kind held for premises in its district, and the location and opening hours of each of the premises;
- c. any areas in which bylaws prohibiting alcohol in public places are in force;
- d. the demography of the district's residents;
- e. the demography of people who visit the district as tourists or holidaymakers;
- f. the overall health indicators of the district's residents; and
- g. the nature and severity of the alcohol-related problems arising in the district.

A district's residents include people who have holiday homes there. The council must also consult with the Police, Alcohol Licensing Inspectors, and the Medical Officers of Health when developing a LAP.

General Findings

With regard the requirements of section 78 of the Act, the key findings were:

- the key objectives and policies of the Rotorua Lakes District Plan relevant to alcohol licensing concern economic development, urban form and development, signage and a vibrant compact city centre. Rotorua's Future Development Strategy was also considered during the review and particularly the aspiration of increased residential activity in the city centre.
- At the end of 2024 there were approximately 161 on-licences, 56 off-licences and 41 club licences held for premises in the district. In 2016, Rotorua had a mid-number of licenced premises compared to the rest of Aotearoa New Zealand.
- The Rotorua District Alcohol Ban Bylaw 2018 bans alcohol being openly consumed in the Central Business District and some surrounding areas, but makes exceptions for special licences and al-fresco dining.
- The demography of the district's residents (especially age, ethnicity, growth in population and relative deprivation) suggest that the residents of Rotorua are particularly susceptible to alcohol-related harm.

- The demography of people who visit the district as tourists or holidaymakers suggest that they are less susceptible to alcohol-related harm than the residents of Rotorua.
- The overall health indicators of the district's residents provided by Te Whatu Ora suggest that they are particularly susceptible to alcohol-related harm.
- The nature and severity of the alcohol-related problems arising in the Rotorua district are generally higher than those for Aotearoa New Zealand overall.

Specific Findings

Furthermore, the specific findings from the LAP Research Report 2025 and information provided by the Police, Alcohol Inspectors, the Medical Officer of Health, the community survey and other engagement with groups and individuals showed that:

- Rotorua² is a highly deprived area and therefore more susceptible to the harms of alcohol.
- Data supplied by NZ Police demonstrates that alcohol-related harm in Rotorua is high, particularly alcohol-related family harm and drink driving.
- Data provided by Te Whatu Ora demonstrates that Rotorua's residents are more likely to attend a hospital due to chronic use of alcohol compared to the NZ average.
- Alcohol-related harm generally peaks during the night to the early hours of the morning.
- The community alcohol survey demonstrated that 76% (~455 people) of respondents felt excessive and inappropriate consumption of alcohol was harming quality of life in our district.
- During pre-consultation engagement with key stakeholders many expressed a particular concern around the availability and accessibility of alcohol in Rotorua and particularly from off-licences.

¹ *Ibid.* University of Otago. Socioeconomic Deprivation Indexes: NZDep and NZiDep, Department of Public Health.



The Act enables communities to have a greater say in when, where and how alcohol is sold in their area through the development and adoption of local alcohol policies. A well-designed LAP can play a significant role in mitigating adverse alcohol-related problems, while promoting safe and responsible drinking practices across the community.

In light of the general and specific findings of the Review, the Council is proposing to update certain policies and adopt a Local Alcohol Policy 2025 (LAP 2025). Important policy options and proposed updates concern:

- off-licence density
- off-licence closing hours and deliveries
- new off-licence engagement with sensitive sites
- off-licence discretionary conditions
- on-licence hours within the Inner City and 'Eat Street'
- new on-licence engagement with sensitive sites
- on-licence discretionary conditions
- club-licence discretionary conditions, and
- special-licence discretionary conditions.

Off-licence policy options

The Review found alcohol-related problems arise in the Rotorua district primarily from sale of alcohol from off-licences. To mitigate against this harm Council is proposing to limit the number of new off-licences opening; reduce trading hours; require pre-application engagement with sensitive and community facilities and add further conditions for the DLC to consider for off-licences.

Specific evidence:

- Over 80% of alcohol sold in New Zealand is sold from off-licences³.
- The Rotorua community alcohol survey highlighted that residents are buying alcohol from off-licences more frequently compared to on-licences.
- Rotorua is a high deprivation area and therefore will experience higher levels of alcohol-related harm^{4,5,6}.
- NZ Police and Te Whatu Ora's specific Rotorua data shows that alcohol-related harm in our District is high, and particularly high during the night.
- During pre-consultation engagement many stakeholders generally felt that alcohol purchased cheaply from off-licences causes the most alcohol-related harm.
- Research shows that reduce trading hours for off-licences has the potential to minimise alcohol-related harm^{7,8}.
- The response to the Rotorua community alcohol survey demonstrated that many in the community feel there are too many bottle stores.
- Rotorua recently set a national record for the number of objections to a new bottle store off-licence application.
- During pre-consultation engagement many stakeholders felt that the definition of sensitive site facilities should incorporate a wider range of community facilities.

¹ **M.E Consultion (Health Promotion Agency) (February 2018)**, *New Zealand Alcohol Supply and Demand Structures*. Available at: *New Zealand Alcohol Supply and Demand Structures: Research Report* (accessed January 2025).

² **M.Hobbs, L.Marek, J.Wiki et al. (2020)**, *Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand, volume 65*. Available at: *Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand* – ScienceDirect (accessed January 2025).

³ **Alcohol Healthwatch (2020)** *Evidence-based alcohol policies: Building a fairer and healthier future for Aotearoa New Zealand*.

⁴ **Bellis.M, Hughes. K et al. (2016)** *The alcohol harm paradox: using a national survey to explore how alcohol may disproportionately impact health in deprived individuals*. Available at: *The alcohol harm paradox: using a national survey to explore how alcohol may disproportionately impact health in deprived individuals* – PMC

⁵ **Geoff C Hay 1, Peter A Whigham, Kypros Kypri, John D Langlely (2009)** *Neighbourhood deprivation and access to alcohol outlets: a national study*. Available at: *Neighbourhood deprivation and access to alcohol outlets: a national study* – PubMed

⁶ **S.Nepal, K.Kypri, T.Beyene et al. (2020)** *Effects of Extensions and Restrictions in Alcohol Trading Hours on the Incidence of Assault and Unintentional Injury: Systematic Review*. Available at: *Effects of Extensions and Restrictions in Alcohol Trading Hours on the Incidence of Assault and Unintentional Injury: Systematic Review* – PubMed (January 2025).

⁷ **J.Atkinson, A.Prodan, M.Livingstone et al. (2018)**, *Impacts of licensed premises trading hour policies on alcohol-related harms, volume 113, Issue 7*. Available at: *Impacts of licensed premises trading hour policies on alcohol-related harms - Atkinson - 2018 - Addiction - Wiley Online Library* (accessed January 2025).

Off-licence density

Currently, there are no restrictions on the number or location of a new off-licence.

In light of the findings from the Review, Council has considered the following policy options:

Policy Option	Description	Advantages	Disadvantages
Option 1: Status quo	There are no policy restrictions in the LAP 2019 on the density of off-licences (that is, the number of or location of new off-licences).	New off-licence applications are dealt with on a case-by-case basis by the DLC.	There are high levels of alcohol-related harm in Rotorua. No restrictions on off-licence density will allow alcohol-related harm to increase.
Option 2: Temporary freeze for 3 years on the issue of off-licences and a presumption against granting off-licences thereafter.	No new off-licences will be granted for 3 years and there will be a presumption against any new off-licence applications being granted thereafter. This policy applies district wide and to all off-licence types.	The policy will reduce alcohol-related harm. The policy will mean efforts can be focused on reducing harm from existing premises.	The policy will reduce competition from new entrants.
Option 3: Permanent freeze in areas of deprivation 9 and 10.	Permanent freeze on off-licence applications in areas of deprivation 9 and 10. This will be based on census area blocks of SA2. See Appendix 1 for NZ Index of Deprivation map and off-licence locations.	The policy will reduce alcohol-related harm (especially in areas of deprivation 9 and 10 who are more vulnerable to alcohol related harm than least deprived communities).	The policy will reduce competition (especially in areas of deprivation 9 and 10) from new entrants. This policy only affects a relatively small area of Rotorua. Off-licences can still open in neighbouring areas.
Option 4: Temporary freeze for 3 years on the issue of off-licences and a presumption against granting off-licences thereafter and permanent freeze in areas of deprivation 9 and 10.	Combination of option 2 and 3. All areas deprivation 8 or under will be subject to a temporary freeze for 3 years and a presumption against thereafter. All areas in deprivation 9 and 10 will be subject to a permanent freeze.	As above for options 2 and 3.	As above for options 2 and 3.

Preferred option

Of these options the Council is proposing a temporary freeze on issuing any new off-licences for 3 years and a presumption against issuing any new off-licences thereafter.

Question 1



Do you agree or disagree with the Council's preferred option (Option 2): a temporary freeze on issuing any new off-licences for 3 years and a presumption against issuing any new off-licences thereafter?

If you disagree, please indicate your preferred option.

Off-licence closing hours and deliveries

Currently, off-licences can be open from 7:00am to 10:15pm except in the period 11 to 24 December, when closing hours are 11.00pm.

In light of the findings from the Review, Council has considered the following policy options:

Policy Option	Description	Advantages	Disadvantages
Option 1: Status quo	Off-licence trading hours remain 7.00am to 10.15pm, except in the period 11 to 24 December, when hours shall be Monday-Sunday 7.00am to 11.00pm.	The current policy allows for greater availability and flexibility for consumers to buy of alcohol from off-licences.	There are high levels of alcohol-related harm.
Option 2: Earlier closing times.	Bringing forward off-licence closing times to reduce alcohol-related harm at night. Trading hours will be reduced to 7.00am to 9.00pm.	The policy will reduce alcohol-related harm late at night. This includes potentially reducing the burden on the emergency services including police and hospital emergency department.	The policy will reduce the availability of alcohol. However, the results from community alcohol survey highlighted that few people buy alcohol past 21:00.
Option 3: Earlier closing times and later opening times	Off-licence trading hours will be reduced to 9.00am to 9.00pm.	The policy will reduce alcohol-related harm late at night and early in the morning. This policy will ensure young people on their way to school are not exposed to alcohol from off-licences.	The policy will reduce the availability of alcohol. Alcohol-related harm is low in the morning. This policy will impact on early morning grocery shoppers who also buy alcohol and who are likely not contributing to harm.

Preferred option

Of the above options, Council is proposing that off-licence trading hours be reduced to 7.00am to 9.00pm.

Question 2A



Do you agree or disagree with the Council's preferred option (Option 2): Earlier closing times for off-licences making trading hours 7:00am to 9:00pm?

Question 2B

Do you agree or disagree with Council's proposal to align delivery hours with off-licence opening hours?

If you disagree, please indicate your preferred option.

Delivery hours

Currently, the national default trading hours for deliveries including alcohol deliveries is between the hours of 6:00am to 11:00pm.

The Review made findings that the dispatch and delivery of alcohol from off-licences (including remote sellers) should be aligned with the closing hours of off-licences to remove any loopholes.

The specific timings of this will depend on the agreed upon option above, the Council's preferred option is 7:00am to 9:00pm.

New off-licence location in proximity to sensitive and community facilities

Currently, new off-licences outside the Inner City are not allowed to open within 200m of an education facility or a marae. Many sensitive and community facilities are used by children, young people, vulnerable people who are more susceptible to alcohol-related harm or are culturally significant venues and therefore where the presence of alcohol is not appropriate.

In light of the findings from the Review, Council has considered the policy options below.

Policy Option	Description	Advantages	Disadvantages
Option 1: Status quo	No new off-licences outside the Inner City are allowed to be located within 200m of an education facility or a marae.	The current policy provides for restrictions on the location of new off-licences in proximity to sensitive facilities which is currently defined as education facilities and marae.	The current policy does not provide for restrictions on the location of new off-licences in proximity to other sensitive facilities (such as places of worship, residential areas, youth centres, hospitals, treatment facilities, community facilities, urupā and cemeteries).
Option 2: Require all new applicants to conduct pre-application engagement with a wider set of sensitive and community facilities.	In addition to meeting the requirements of option 1, all new off-licence applicants to conduct pre-engagement with other sensitive and community sites within a 200m radius. The proposed list of facilities includes: <ul style="list-style-type: none"> • places of worship • residential activity • youth centres • hospitals • rehabilitation facilities • community facilities* • urupā and • cemeteries. <p>200m is measured as the crow flies and boundary to boundary of a premise.</p> <p>Evidence of engagement can be a letter or hosting a meeting.</p>	The policy will reduce the potential for alcohol-related harm to occur near these facilities. The policy will ensure the needs of Rotorua's young and vulnerable people are considered when reviewing the location of a new off-licence. This policy will ensure Rotorua's strong cultural heritage is considered when reviewing the location of a new off-licence. Off-licences can still open near these places.	The policy will add further burden on new off-licence applicants.

Preferred option

**Community facility defined in the District Plan means land or buildings which are used in whole or in part for the assembly of persons for such purposes as deliberation, or social entertainment or similar purposes and includes such buildings used for clubrooms, arts, museum and cultural community premises, community theatres, conference rooms, churches, and meeting rooms, not for profit social support and services but does not include a chartered club or building designed specifically for indoor recreation.*

Of these options, Council is proposing that the current policy be retained but require pre-application engagement by applicants for a proposed new off-licence within 200m of any stated sensitive and community facility.

Question 3



Do you agree or disagree with the Council's preferred option (Option 2): Keep the current requirements with regards to sensitive sites and additionally, require all new off-licence applicants to conduct pre-application engagement with a wider set of sensitive and community facilities within 200m?

If you disagree, please indicate your preferred option.

Off-licence discretionary conditions

The current LAP 2019 sets certain discretionary conditions that the District Licensing Committee (DLC) can apply to an off-licence premise. The DLC can impose conditions above and beyond the conditions listed in the LAP.

In light of the findings from the Review, Council has considered the following policy options:

Policy Option	Description	Advantages	Disadvantages
Option 1: Status quo	Discretionary conditions that may be applied by the DLC to an off-licence include implementation of the Crime Prevention through Environmental Design (CPTED) principles, and alcohol product advertising must not be 50% of premise façade.	CPTED is a crime prevention strategy that uses to design to manage the physical environment of a property or area to reduce opportunities for criminal activity.	The current LAP conditions are limited when there are a broader range of discretionary conditions that might be applied.
Option 2: Adopt additional discretionary conditions	<p>Retain the principles of the current discretionary conditions and include additional discretionary conditions to be considered for application to off-licences. These are as follows:</p> <p>Mandatory conditions for all off-licences</p> <ul style="list-style-type: none"> • Social responsibility policy. This should include detail on staff training, not serving minors, remote sale of alcohol etc; • maintenance of an alcohol-related incidents book; • no buy now, pay later schemes, and • no advertising of alcohol on store or any external signs or chattels- only brand name and logo. <p>Other conditions set by DLC based on size, risk and past compliance</p> <ul style="list-style-type: none"> • CCTV; • CPTED - Effective lighting, location of the point of sale; • Restrictions on single sales of cans like beers or ciders, as well as shots, and • restrictions on the display of alcohol at store entrance or windows. 	<p>The policy will reduce alcohol-related harm from both existing and new premises.</p> <p>Adding these conditions to the LAP will enable the DLC to apply these conditions on licenses more easily, however they will still applied on a case-by-case basis.</p>	The policy will increase the compliance requirements for off-licence premises.

Preferred option

Question 4



Do you agree or disagree with the Council's preferred option (Option 2): the current discretionary conditions be retained and further additional discretionary conditions be added?

If you disagree, please indicate your preferred option.

Of these options the Council is proposing to retain the current discretionary conditions for off-licences and add further discretionary conditions that be added for application to off-licences.

On-licence policy options

The Review found that alcohol-related problems are high during the night and early hours of the morning (duration the operational hours of on-licences). To mitigate against this harm Council is proposing to reduce the trading hours of on-licences. This consultation also seeks feedback regarding pre-application engagement with sensitive and community facilities and whether the DLC should consider further conditions for on-licences.

Specific evidence:

- Rotorua is a high deprivation area and therefore will experience higher levels of alcohol-related harm^{9,10,11}.
- NZ Police and Te Whatu Ora's specific Rotorua data shows that alcohol-related harm in our District is high, and particularly high during the night and into the early morning.
- Research shows that reduce trading hours for on-licences has the potential to minimise alcohol-related harm^{12,13,14}.
- During pre-consultation engagement many stakeholders felt that the definition of sensitive site facilities should incorporate a wider range of community facilities.

⁹ ***Ibid. Alcohol Healthwatch, 2020, Evidence-based alcohol policies: Building a fairer and healthier future for Aotearoa New Zealand.***

¹⁰ ***Ibid. Bellis.M et al. (2016) The alcohol harm paradox: using a national survey to explore how alcohol may disproportionately impact health in deprived individuals.***

¹¹ ***Ibid. Geoff C Hay et al (2009) Neighbourhood deprivation and access to alcohol outlets: a national study.***

¹² ***S.Nepal, K.Kypri, T.Beyene et al. (2020) Effects of Extensions and Restrictions in Alcohol Trading Hours on the Incidence of Assault and Unintentional Injury: Systematic Review. Available at: Effects of Extensions and Restrictions in Alcohol Trading Hours on the Incidence of Assault and Unintentional Injury: Systematic Review – PubMed (January 2025).***

¹³ ***J.Atkinson, A.Prodan, M.Livingstone et al. (2018), Impacts of licensed premises trading hour policies on alcohol-related harms, volume 113, Issue 7. Available at: Impacts of licensed premises trading hour policies on alcohol-related harms - Atkinson - 2018 - Addiction - Wiley Online Library (accessed January 2025).***

¹⁴ ***Wilkinson.C, Livingstone.M and Room.R. (2016). Impacts of changes to trading hours of liquor licences on alcohol-related harm: a systematic review 2005-2015. Available at: Impacts of changes to trading hours of liquor licences on alcohol-related harm: a systematic review 2005-2015 - PubMed***

On-licence trading hours within the Inner City and 'Eat Street'

Currently, on-licences are allowed to sell alcohol in the:

- Inner city¹⁵ between 8:00am to 3:00am (following day).
- Outside inner city between 8:00am to 1:00am (following day).

In light of the findings from the Review, Council has considered the following policy options:

Policy Option	Description	Advantages	Disadvantages
Option 1: Status quo	The current policy provides that the closing hours of on-licences within the Inner City are 3.00am.	The current policy allows for greater availability of alcohol to be sold and consumed at on-licences in the Inner City.	There are high levels of alcohol-related harm during the night and early hours of the morning.
Option 2: Earlier closing times of 2:00am	On-licence closing hours within the Inner City will be reduced to a maximum of 2:00am. Outside the Inner City all on-licences will need to close by 1:00am. Certain discretionary conditions will be considered by the DLC to on-licences seeking closing hours of 2:00am (rather than 1:00am).	The policy will reduce alcohol-related harm. This is likely to reduce burden on the emergency services at night including police and hospital emergency department.	The policy has the potential to reduce nightlife options for residents and tourists.
Option 3: Require all premises within the Inner City to close by 2:00am, however 'Eat Street'	As above, however on-licence closing hours within 'Eat Street' will be reduced to a maximum of 1:00am.	The policy will reduce alcohol-related harm in 'Eat Street'.	The policy has the potential to reduce nightlife options for residents and tourists on 'Eat Street'.
Option 4: Earlier closing times of 1:00am	All on-licence closing hours will be reduced to a maximum of 1:00am.	The policy will likely have the biggest impact on reducing alcohol-related harm. This is likely to reduce burden on the emergency services at night including police and hospital emergency department.	The policy has strong potential to reduce nightlife options for residents and tourists.

Preferred option

Of these options, the Council is proposing the on-licence closing hours within the Inner City be reduced to a maximum of 2:00am. On-licence closing hours for premises outside the Inner City will remain 1.00am.

¹⁵ See Appendix 2 for map of the Inner City.

Question 5

Do you agree or disagree with the Council's preferred option (Option 2): on-licence closing hours within the Inner City be reduced to a maximum of 2:00am and on-licence closing hours for premises outside the Inner City remain 1.00am?

If you disagree, please indicate your preferred option.

New on-licence location in proximity to sensitive facilities

Currently, new on-licence premises have no restrictions on where they can open in relation to sensitive sites.

Many sensitive and community facilities are used by children, young people, vulnerable people who are more susceptible to alcohol-related harm or are culturally significant venues and therefore where the presence of alcohol is not appropriate.

In light of the findings from the Review, Council has considered the policy options below.

Policy Option	Description	Advantages	Disadvantages
<p>Option 1: Status quo</p>	<p>There are no policy restrictions in the LAP 2019 on the location of new on-licence applications in relation to sensitive facilities.</p>	<p>The policy will not add administrative burden on new on-licence applicants.</p>	<p>The current policy does not provide restrictions on the location of new on-licence applications in relation to sensitive facilities, which may result in increased nuisance, vandalism and noise for sensitive sites and residences.</p>
<p>Option 2: Require all new applicants of bars, taverns and nightclubs to conduct pre-application engagement with a range of sensitive and community facilities within 200m.</p>	<p>Require all new on-licence applicants of bars, taverns and nightclubs to conduct pre-engagement with sensitive and community sites within a 200m radius.</p> <p>The proposed list of facilities includes:</p> <ul style="list-style-type: none"> • places of worship • residential activity • education facilities • marae • youth centres • hospitals • rehabilitation facilities • community facilities • urupā and • cemeteries. <p>Evidence of engagement can be a letter or hosting a meeting.</p>	<p>The policy will reduce the potential for alcohol-related harm to occur near these facilities.</p> <p>The policy will ensure the needs of Rotorua's young and vulnerable people are considered when reviewing the location of a new high risk on-licence premise.</p> <p>This policy will ensure Rotorua's strong cultural heritage is considered when reviewing the location of a new high risk on-licence premise.</p> <p>On-licences can still open near these places.</p>	<p>The policy will add further administrative burden on new on-licence applicants.</p> <p>Many of these facilities are not open during the hours of operations of these types of premises.</p>

Preferred option

Of these options, the Council proposes there be no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities.

Question 6



Do you agree or disagree with the Council's preferred option (Option 1): Status quo, there are no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities?

If you disagree, please indicate your preferred option.

On-licence discretionary conditions

The current LAP 2019 sets certain discretionary conditions that the DLC can apply to an on-licence premise. The DLC can impose conditions above and beyond the conditions listed in the LAP.

In light of the findings from the Review, Council has considered the following policy options:

Policy Option	Description	Advantages	Disadvantages
Option 1: Status quo	Discretionary conditions that may be applied by the DLC include: one way door restrictions, implementation of the CPTED principles, and host responsibility policies.	The current policy provides for discretionary conditions to be applied by the DLC regarding one-way-door restrictions, the CPTED principles, and host responsibility policies.	The current LAP conditions are limited when there are a broader range of discretionary conditions that might be applied.
Option 2: Adopt additional discretionary conditions	Retain the current discretionary conditions and include additional discretionary conditions to be considered for application to on-licences. Mandatory provisions: <ul style="list-style-type: none"> • Host responsibility policy. To include: staff training, not serving minors, dealing with intoxicated people etc. • maintenance of an alcohol-related incidents book • signage on transport, not serving minors etc. Consideration by the DLC based on size, risk and past compliance: <ul style="list-style-type: none"> • CPTED - lighting • CCTV • one way door restrictions • security after a certain time • patron to security ratio • patron to duty manager ratio • restrictions on size of shots and last orders • queue management policy • happy hour restrictions • restrictions on outdoor seating • noise management plan, if premise is subject of complaints. 	The policy revisions will reduce alcohol-related harm from both existing and new premises.	The revision to the policy has the potential to increase the compliance requirements for on-licence premises.

Preferred option

Question 7

Do you agree or disagree with the Council’s preferred option (Option 1): Status quo, keep the current discretionary conditions for on-licences?

If you disagree, please indicate your preferred option.

Of these options, Council proposes that the current discretionary conditions be retained as they are.

Club-licences policy options

The Review found that alcohol-related problems are high in Rotorua. The Council is seeking feedback on whether the DLC should consider further conditions for club-licences.

Specific evidence:

- Rotorua is a high deprivation area and therefore will experience higher levels of alcohol-related harm^{16,17,18}.
- NZ Police and Te Whatu Ora's specific Rotorua data shows that alcohol-related harm in our District is high, and particularly high during the night and into the early morning.

¹⁶ *Ibid. Alcohol Healthwatch, 2020, Evidence-based alcohol policies: Building a fairer and healthier future for Aotearoa New Zealand.*

¹⁷ *Ibid. Bellis.M et al. (2016) The alcohol harm paradox: using a national survey to explore how alcohol may disproportionately impact health in deprived individuals.*

¹⁸ *Ibid. Geoff C Hay et al (2009) Neighbourhood deprivation and access to alcohol outlets: a national study.*

Club-licence discretionary conditions

The current LAP 2019 sets certain discretionary conditions that the DLC can apply to a club-licence premise. The DLC can impose conditions above and beyond the conditions listed in the LAP.

In light of the findings from the Review, Council has considered the following policy options:

Policy Option	Description	Advantages	Disadvantages
Option 1: Status quo	Discretionary conditions that may be applied by the DLC include: one way door restrictions, implementation of the CPTED principles, and host responsibility policies.	The current policy provides for discretionary conditions to be applied by the DLC regarding one-way-door restrictions, the CPTED principles, and host responsibility policies.	The current LAP conditions are limited when there are a broader range of discretionary conditions that might be applied.
Option 2: Adopt additional discretionary conditions	Retain the current discretionary conditions and include additional discretionary conditions to be considered for application to on-licences. Mandatory provisions: <ul style="list-style-type: none"> • Host responsibility policy. To include: staff training, not serving minors, dealing with intoxicated people etc. • maintenance of an alcohol-related incidents book • signage on transport options etc • a duty manager to be present during busy periods (50+ people). Consideration by the DLC based on size, risk and past compliance: <ul style="list-style-type: none"> • CPTED - lighting • CCTV • security after a certain time • one way door restrictions. 	The policy revisions will reduce alcohol-related harm from both existing and new premises.	The revision to the policy has the potential to increase the compliance requirements for club-licence premises.

Preferred option

Of these options, Council proposes that the current discretionary conditions be retained as they are.

Question 8

Do you agree or disagree with the Council’s preferred option (Option 1): Status quo, keep the current discretionary conditions for club-licences?

If you disagree, please indicate your preferred option.

Special-licences policy options

The Review found that alcohol-related problems are high in Rotorua. The Council is seeking feedback on whether the DLC should consider further conditions for club-licences.

Specific evidence:

- Rotorua is a high deprivation area and therefore will experience higher levels of alcohol-related harm^{19,20,21}.
- NZ Police and Te Whatu Ora's specific Rotorua data shows that alcohol-related harm in our District is high, and particularly high during the night and into the early morning.

¹⁹ *Ibid. Alcohol Healthwatch, 2020, Evidence-based alcohol policies: Building a fairer and healthier future for Aotearoa New Zealand.*

²⁰ *Ibid. Bellis.M et al. (2016) The alcohol harm paradox: using a national survey to explore how alcohol may disproportionately impact health in deprived individuals.*

²¹ *Ibid. Geoff C Hay et al (2009) Neighbourhood deprivation and access to alcohol outlets: a national study.*

Special-licence discretionary conditions

The current LAP 2019 sets certain discretionary conditions that the DLC can apply to a special-licence. The DLC can impose conditions above and beyond the conditions listed in the LAP.

In light of the findings from the Review, Council has considered the policy options below.

Policy Option	Description	Advantages	Disadvantages
<p>Option 1: Status quo</p>	<p>Discretionary conditions that may be applied by the DLC include requiring certain foods to be available based on the duration of an event.</p>	<p>The current policy provides for discretionary conditions to be applied by the DLC regarding certain foods being available based on the duration of an event.</p>	<p>The current LAP conditions are limited when there are a broader range of discretionary conditions that might be applied.</p>
<p>Option 2: Adopt additional discretionary conditions</p>	<p>Retain the current discretionary conditions and include additional discretionary conditions to be considered for application to special-licences.</p> <p>Consideration by the DLC based on size, risk and past compliance:</p> <ul style="list-style-type: none"> • staff training • security after a certain time • one way door restrictions. <p>Mandatory for large scale event (200+)</p> <ul style="list-style-type: none"> • Alcohol Management Plan, to include detail on security, crowd control, water etc. RLC to provide template. • register of alcohol-related incidents • consultation with police, medical officer of health and licensing inspector before and after event. 	<p>The policy revisions will reduce alcohol-related harm from any events using a special-licence, particularly any large scale events.</p>	<p>The revision to the policy has the potential increase the compliance and administration requirements for those applying for a special licence.</p>

Preferred option

Question 9

Do you agree or disagree with the Council’s preferred option (Option 1): Status quo, keep the current discretionary conditions for special-licences?

If you disagree, please indicate your preferred option.

Of these options, Council is proposing that the current discretionary conditions be retained as they are.

Before making any final decisions, we'd like to have your input. Your views are vital to the success of the LAP 2025.

We would like to invite you to provide submissions on the proposed updates for the LAP 2025 to assist the Council in the decision-making process. This is your opportunity to have your say about the proposed key policies of the Local Alcohol Policy 2025.

Ways to make a submission:

- Fill out a survey: You can provide your feedback on the online survey form.
- Email us: Write to us via email at letstalk@rotorualc.nz.
- Write to us: Send your feedback to Rotorua Lakes Council, 1061 Haupapa Street attention Local Alcohol Policy 2025.
- Phone us: Call us on 07 348 4199 between 8am - 5pm, Monday to Friday.
- Talk to us: Come and make a short verbal presentation to us. Call 07 348 4199 to arrange to come into the Council building and we will record your feedback.

If you would like to speak to your submission, please indicate this and provide your contact details. We will be in touch to let you know the date and time for verbal submissions.

Please be aware that submissions made to the Council are public information. Your submission will be used and reproduced for purposes such as reports to Councillors, which are also made available to the public and media.

If you advise on your submission that assistance is required, the Council can help with special requirements such as Māori language translation, New Zealand sign language or audio-visual mechanisms.

Timeline

Consultation period begins: 28th February 2025

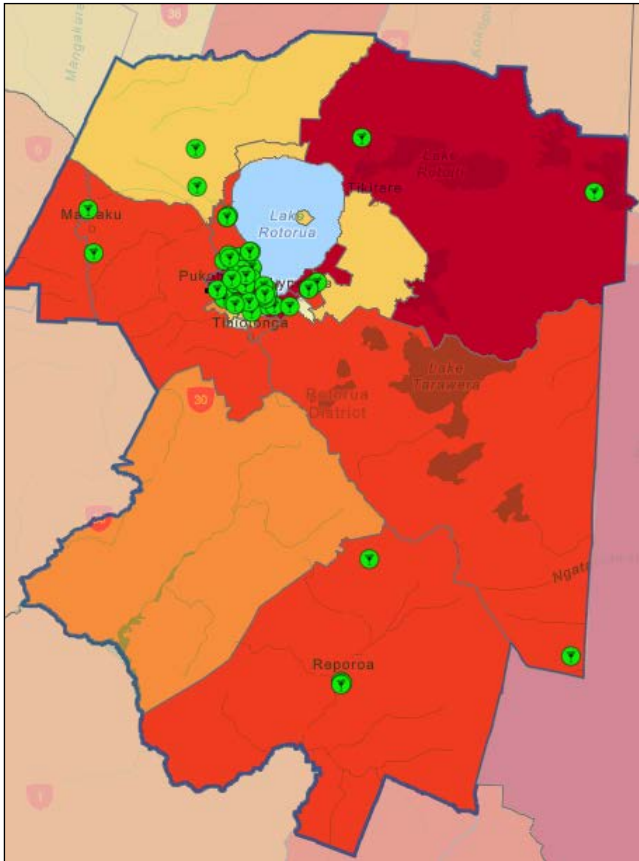
Closing date for submissions: 31st March 2025

Next Step(s)

Following the recent amendments in the Sale and Supply of Alcohol Act 2012 (Sale and Supply of Alcohol (Community Participation) Amendment Act 2023) Council is no longer required to adopt a provisional LAP and provide a right of appeal against the draft/provisional policy.

The next step for the Council after consultation and hearings would be to take a final decision on Rotorua Lakes Council's Local Alcohol Policy 2025.

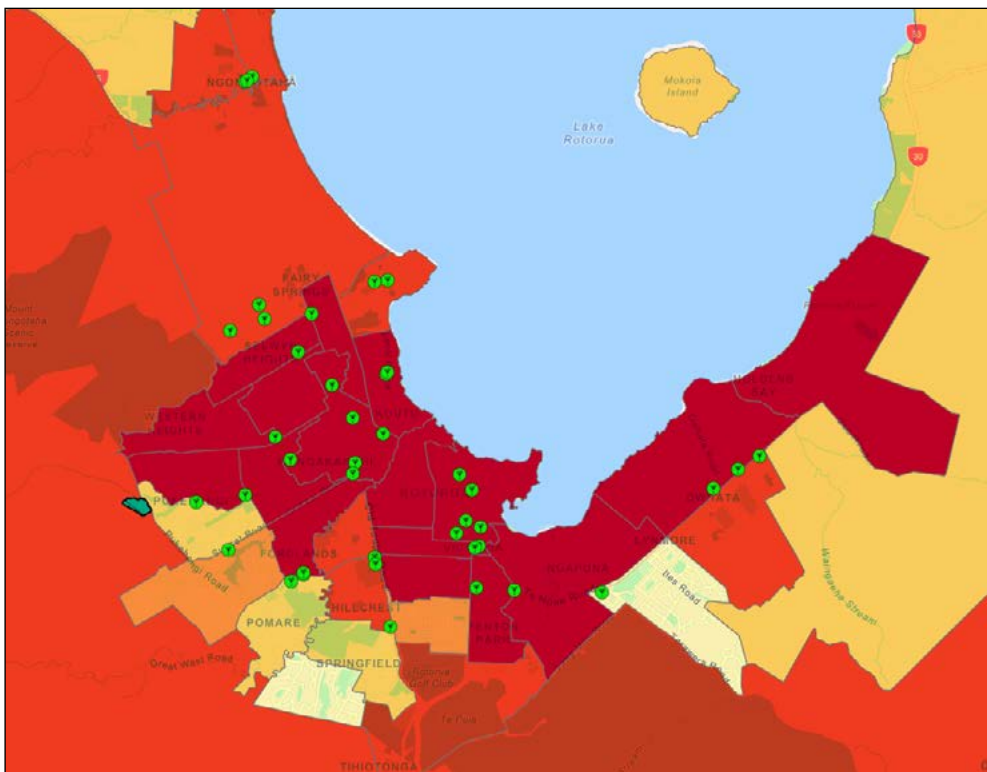
Appendix 1 - NZ Index of Deprivation map 2023 and off-licence locations across Rotorua



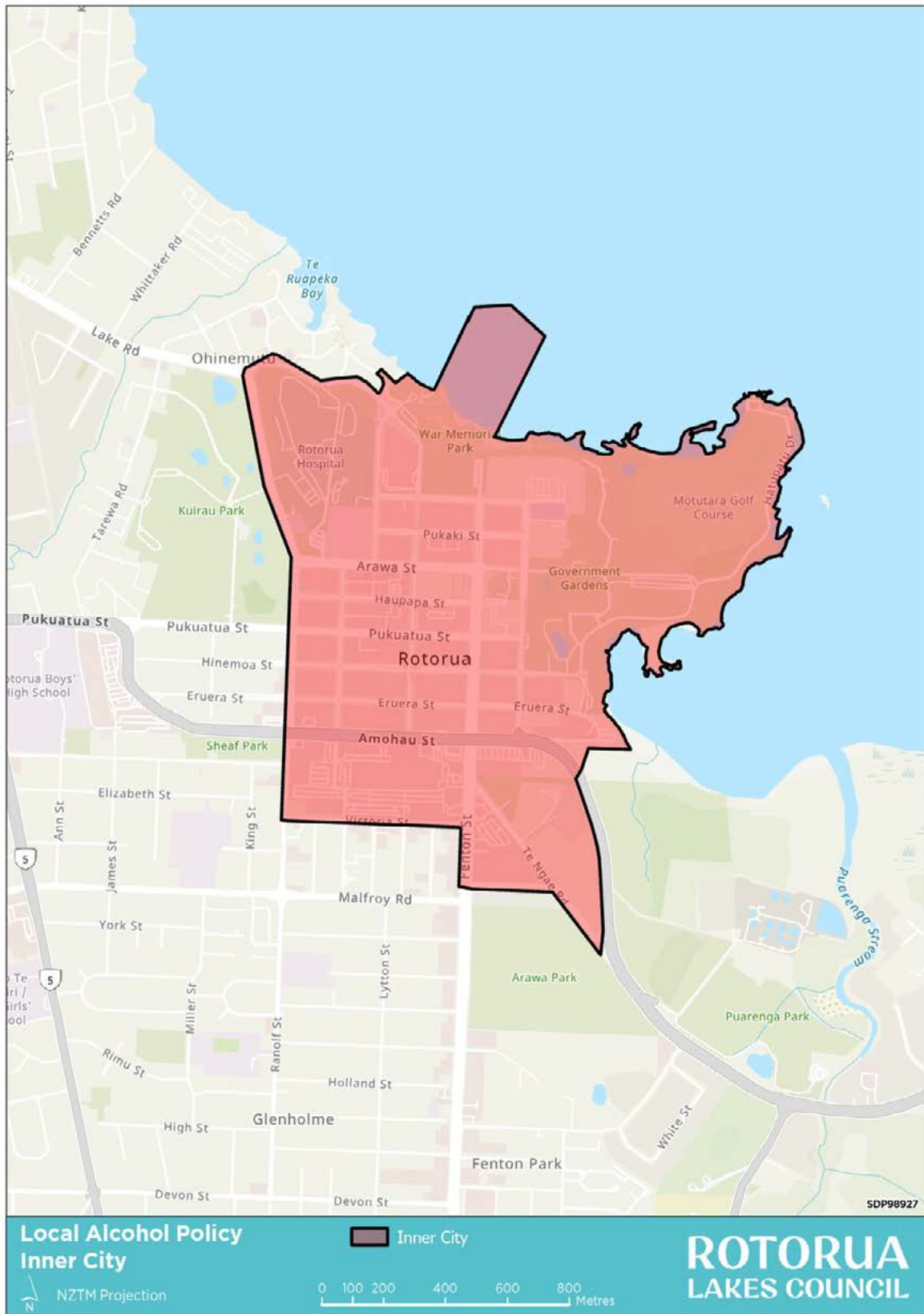
New Zealand Index of Deprivation 2023

Statistical Area 2 (SA2)

SA2_average_NZDep2023



Appendix 2 - Map of Inner City





TE KAUPAPA HERE WAIPIRO Ā-ROHE - PEPA WHAKAHOKI KŌRERO

LOCAL ALCOHOL POLICY - FEEDBACK FORM

Tō Ingoa | Your Name:

Tō Īmēra, tō waea rānei | Your Email or Phone Number:

Kei te pīrangī koe ki te tū i mua i a matawhānui ki te tāpae atu ki Kaunihera?

Do you wish to present your submission publicly in front of your Councillors at a hearing?

Āe | Yes **Kāo** | No

If yes, when would you prefer to present? **Morning** **Afternoon** **Evening**

Pātai 1: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia 3 tau te roa o te aukatinga taupuatanga o te tukunga o ngā raihana toa hoko waipiro me te pōhēhē hoki ka whakaaetia ētehi atu raihana toa hoko waipiro ā muri ake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe.

Question 1: Do you agree or disagree with the Council's preferred option (Option 2): a temporary freeze on issuing any new off-licences for 3 years and a presumption against issuing any new off-licences thereafter? If you disagree, please indicate your preferred option.

Pātai 2a: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia wawe ake te katinga o ngā toa hoko waipiro i te 7 karaka i te ata ki te 9 karaka i te pō? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe.

Question 2a: Do you agree or disagree with the Council's preferred option (Option 2): Earlier closing times for off-licences making trading hours 7:00am to 9:00pm? If you disagree, please indicate your preferred option.





Pātai 2b: E whakaae ana rānei koe ki te tono a te Kaunihera kia rite ngā hāora rato ki ngā hāora tuwhera o ngā toa hoko waipiro? Ki te whakahē koe, tēnā whakamāramahia mai.

Question 2b: Do you agree or disagree with the Council's proposal to align delivery hours with off-licence opening hours? If you disagree please provide your reasoning.

Pātai 3: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): Kia mau tonu ngā herenga e hāngai ana ki ngā wāhi me tiaki e te tūtehi e whai wāhi nei ngā kaitono toa hoko waipiro kia uru ki tētehi hui tono wawe i te taha o ētehi atu ratonga o te hapori e tata ana i roto i takiwā o te 200 mita? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe.

Question 3: Do you agree or disagree with the Council's preferred option (Option 2): Keep the current requirements with regards to sensitive sites and additionally, require all new off-licence applicants to conduct pre-application engagement with a wider set of sensitive and community facilities within 200m? If you disagree, please indicate your preferred option.

Pātai 4: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): kia mau tonu ngā whakatairanga herenga here kore me ētehi atu herenga here kore ka āpitihia? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe

Question 4: Do you agree or disagree with the Council's preferred option (Option 2): The current discretionary conditions be retained and further additional discretionary conditions be added? If you disagree, please indicate your preferred option.

Pātai 5: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 2): kia whakaitia ngā hāora o te raihana rato waipiro i ngā pāpara kāuta me ngā wharekai o te tāone ki te rua karaka i te ata. Kia katia tonuhia ngā pāpara kāuta me ngā wharekai i waho i te tāone i te tahi karaka i te ata? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe.

Question 5: Do you agree or disagree with the Council's preferred option (Option 2): on-licence closing hours within the Inner City be reduced to a maximum of 2:00am. On-licence closing hours for premises outside the Inner City will remain 1.00am? If you disagree, please indicate your preferred option.

Pātai 6: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, karekau he herenga kia tū tētehi hui tono wawe e whiwhi ai i tētehi raihana pāpara kāuta e whai pānga ana ki ngā ratonga me whai tūtei? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe.

Question 6: Do you agree or disagree with the Council's preferred option (Option 1): Status quo, there are no restrictions or pre-application engagement requirements for on-licences in relation to sensitive or community facilities? If you disagree, please indicate your preferred option.

Pātai 7: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana pāpara kāuta? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe.

Question 7: Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for on-licences? If you disagree, please indicate your preferred option.





Pātai 8: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana-karapu? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe.

Question 8: Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for club-licences? If you disagree, please indicate your preferred option.

Pātai 9: E whakaae ana rānei koe ki te whiringa e hiahiatia ana e te Kaunihera (Whiringa 1): E ai ki te nuinga, me mau tonu ngā herenga here kore o moroki nei o ngā raihana motuhake? Ki te whakahē koe, tēnā whakamōhiohia mai te whiringa pai ake ki a koe.

Question 9: Do you agree or disagree with the Council's preferred option (Option 1): Status quo, keep the current discretionary conditions for special-licences? If you disagree, please indicate your preferred option.

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



ROTORUA
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