

Thursday, 26 June 2025

Te Hui o Te Kaunihera ā-Rohe o Heretaunga
Hastings District Council
Council Meeting

Kaupapataka

Attachments Volume 1

Te Rā Hui:
Meeting date: **Thursday, 26 June 2025**

Te Wā:
Time: **1.00pm**

Te Wāhi:
Venue: **Council Chamber
Ground Floor
Civic Administration Building
Lyndon Road East
Hastings**

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TE KAUNIHERA Ā-ROHE O HERETAUNGA

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HASTINGS DISTRICT LOCAL ALCOHOL POLICY

Item 9

1.0 INTRODUCTION

The Sale and Supply of Alcohol Act 2012 (the Act) was enacted on 18 December 2012. The Act allows Territorial Authorities to develop a Local Alcohol Policy (LAP). This policy applies to any alcohol licensing application made to a District Licensing Committee within the Hastings District.

The LAP has been developed in consultation with the Police, Medical Officers of Health, Licensing Inspectors, industry and community. Once the LAP is in place, the Council's District Licensing Committee and the Alcohol Regulatory and Licensing Authority will have to have regard to the policy when they make decisions on licence applications.

Under the Act the LAP may:

- Restrict or extend the default maximum trading hours set out in the Act.
- Impose conditions on types of licences such as one-way door conditions whereby a patron is allowed to leave a premise after a certain time but not enter or re-enter after a certain time.
- Specify restrictions on the location of licensed premises in particular areas or near facilities of particular kinds.
- Specify whether further licences (or licences of a particular kind or kinds) should be issued for premises in a particular area.
- Recommend discretionary conditions.

The LAP will guide decisions on alcohol licence applications by the District Licensing Committee with the aim of:

- Creating a safe and healthy community while minimising alcohol related harm
- Fostering safe and responsible drinking environments
- Reflecting community views on the sale and supply of alcohol within the district.

2.0 OBJECTIVES OF THE LAP

The Act has established a new system of control over the sale and supply of alcohol that is reasonable and that helps to achieve the object of the Act. The object of the Act is that:

- The sale, supply and consumption of alcohol should be undertaken safely and responsibly; and

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- The harm caused by the excessive or inappropriate consumption of alcohol should be minimised.

Beyond the object stated in the Act, the objectives of the LAP are:

- To support the purpose and intent of the Act.
- To identify what types of harm caused by the excessive or inappropriate consumption of alcohol the community is concerned about and address those harms to the extent appropriate.
- To provide a framework for the District Licensing Committee and Alcohol Regulatory and Licensing Authority to guide their decisions on alcohol licence applications.
- To promote transparency and provide clarity for the public and applicants about whether an application will meet the provisions of the LAP.
- To demonstrate leadership to achieve a safe drinking culture.
- Work collaboratively with community, agencies and industry on initiatives to reduce alcohol related harm.



3.0 HOURS

The following maximum trading hours apply to all licensed premises within the Hastings District.

3.1 On-Licence Hours

On Licence Type	Maximum Trading Hours
Taverns/bars/pubs/night-clubs – breweries / cideries / distilleries / endorsed caterer	Monday to Sunday 8.00am to 2.00am the following day One way door restriction: Mandatory at 1.00 am
Cafes/restaurants/wineries/winery restaurants / hotels (accommodation)	Monday to Sunday 8.00am to 1.00am the following day
Entertainment venues / function centres and ‘otherwise not specified’ (as per regulation 5 of the Sale and Supply of Alcohol (Fees) Regulations 2013.)	Licensing hours are to be consistent with the nature and activities of the premise and in general shall range from: Monday to Sunday 8.00am to 1.00am the following day

Note: The owner/operator of an on-licensed premise will be constrained by the hours defined by any resource consent or District Plan requirements. The above-stated hours do not imply any right to operate outside any requirements set under the Resource Management Act 1991.

3.2 Off-Licence Hours

Off Licence Type	Maximum Trading Hours
All off licences (excluding remote sales)	9.00 am to 9.00 pm Monday to Sunday
Remote Sales Licence	As per the Sale and Supply of Alcohol Act 2012 – Sale: Any day at any time Delivery: 6.00 am to 11.00 pm



3.3 Club Licence Hours

Club Licence Type	Maximum Trading Hours
Class One Club	Licensing hours are to be consistent with the nature and activities of the club and in general shall range from: Monday to Sunday 8.00am to 1.00am the following day
Class Two and Three Club	Licensing hours are to be consistent with the nature and activities of the club and in general shall range from: Monday to Sunday 8.00am to 12.00am midnight the following day

3.4 Special Licences

Special Licences may be issued for the on-site or off-site consumption of alcohol for a special event or series of events. The Act allows special licences to be issued for up to 12 months. Special licenses are to allow the sale and supply of alcohol at events and are not intended to be a substitute for an “on”, “off” or “club” licence.

Applications for special licences should be filed as per Section 137 of The Sale and Supply of Alcohol Act 2012.

All applications must comply with the provisions of the District Plan. Where an objection to an application is received the application will be referred for a formal hearing to the District Licensing Committee for a decision.

3.5 Special Licence Hours

Special licence	Maximum Trading Hours
	Monday to Sunday 8.00am to 2.00 am the following day, unless the event is deemed suitable to extend beyond these hours, and the applicant can provide justification for the need for the extended hours.



4.0 LOCATION OF LICENSED PREMISES

From the date this LAP comes into force, no further off-licences are to be issued for any premises being a bottle store on land located within:

- **Flaxmere** - the Commercial Service or Suburban Commercial zone in Flaxmere, or any Precinct within the Flaxmere Village Centre Zone or Scheduled sites 1 and 2 within Flaxmere (within the Hastings Council District Plan) shown as identified in **Map 1**.
- **Camberley** - the suburban commercial zone in Camberley (within the Hastings Council District Plan) identified in **Map 2**.

Note: In all areas not listed above the District Licensing Committee may grant an on, off or club licence for any premises located in any zone where the sale and supply of alcohol is a permitted activity under the relevant District Plan. Applications will not be considered in other areas unless resource consent has been granted.

5.0 DISCRETIONARY CONDITIONS

Section 117 of the Act permits a District Licensing Committee to issue any licence subject to any reasonable conditions not inconsistent with the Act.

Discretionary conditions are in addition to the mandatory conditions specified within the Act. Section 117 allows the District Licensing Committee discretion as to conditions that may be applied to a licence.

In order to provide some guidance to the District Licensing Committee and some certainty to applicants, the following conditions are a list of those which **may** be imposed by the District Licensing Committee where they are considered reasonable and appropriate. In using its discretion to apply conditions, the District Licensing Committee will be guided by the following:

- **Connection** – whether there is a connection between the problem to be addressed and the proposed activity.
- **Impact** – whether in the opinion of the District Licensing Committee the proposed condition will contribute to making the drinking environment safer and minimise harm.
- **Reasonableness** – whether it is a proportionate, fair and balanced response to a clear risk, or if it achieves a meaningful benefit. The District Licensing Committee must look at the specific risk(s) or benefit(s) the condition addresses and weigh it against the overall context of the application.

Note: While the District Licensing Committee has the discretion to add discretionary condition(s), it is anticipated that an applicant would have the opportunity to submit comments to the District Licensing Committee prior to the imposition of any condition that may have a financial or management impact on their business.

The following are conditions which **may** be applied to alcohol licences by the District Licensing Committee based on their discretion. For the avoidance of doubt, the potential discretionary



conditions in this policy are not mandatory and should not be automatically applied as a matter of course.

5.1 On-licences and Club Licences

- CCTV cameras (location and number and keep recording for a minimum of 28 days)
- Provision of effective exterior lighting
- No serving in glass containers at specified times
- Number of door-staff and provision of additional security staff after specified times
- Management of patrons queuing to enter the licensed premise
- Limit on the number of drinks per customer at specified times
- No shots or types of drinks to be served after specified times
- Limit on drink sizes after specified times
- Conditions relating to management: such as certificated staff required if the maximum occupancy exceeds a prescribed number or if recommended by Police or the Inspector, requirement for multiple managers.
- One way door restrictions
- Provision of transport for patrons
- Restriction on the use of outdoor areas after a specified time
- Club specific - Conditions relating to management: such as certificated staff required at all clubs unless the bar is staffed voluntarily and membership is below a prescribed number.
- Utilise the principals of Crime Prevention through Environmental Design. (CPTED)
- Maintain, and provide upon request, an incident register of alcohol related incidents.
- Mandatory reporting of violent incidents to NZ Police.
- Maintain and provide upon request a duty manager register.

5.2 Off-licences

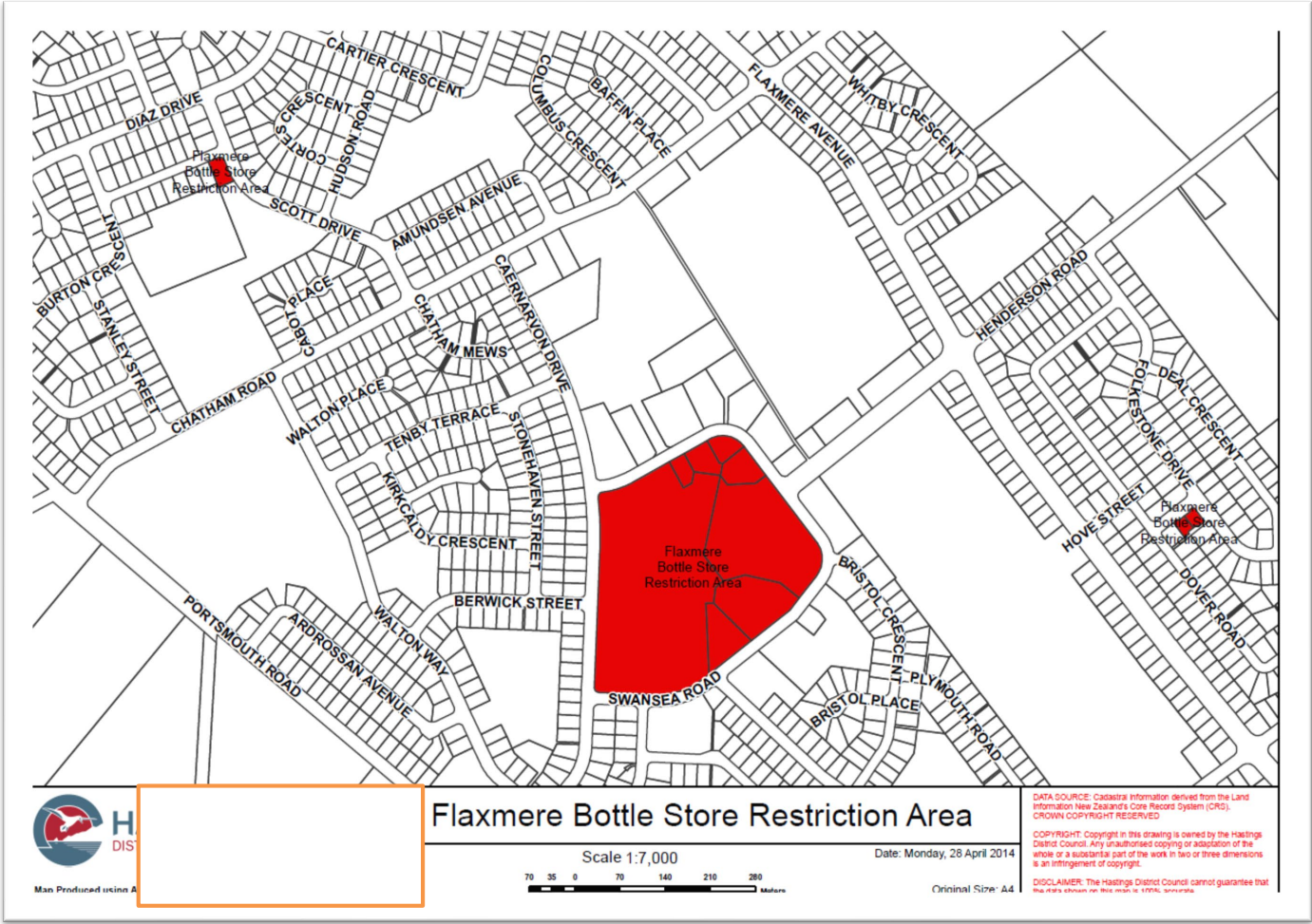
- Display of safe drinking messages/material
- CCTV cameras (location and number and holding or recordings for at least 28 days.)
- Provision of effective exterior lighting
- Limit on alcohol related exterior signage or advertising to 30% of the building or glass exterior.
- Utilise the principals of Crime Prevention through Environmental Design. (CPTED)
- Maintain, and provide and upon request, an incident register of alcohol related incidents
- Mandatory reporting of violent incidents to NZ Police.
- Maintain and provide upon request a duty manager register.
- Low alcoholic drinks and 0% alcohol beer to be available for sale.
- There shall be no single sales of high strength beer or cider that is 500ml and under and stronger than 5.5% ABV for under \$x.xx, (price to be imposed by the DLC following an application.)

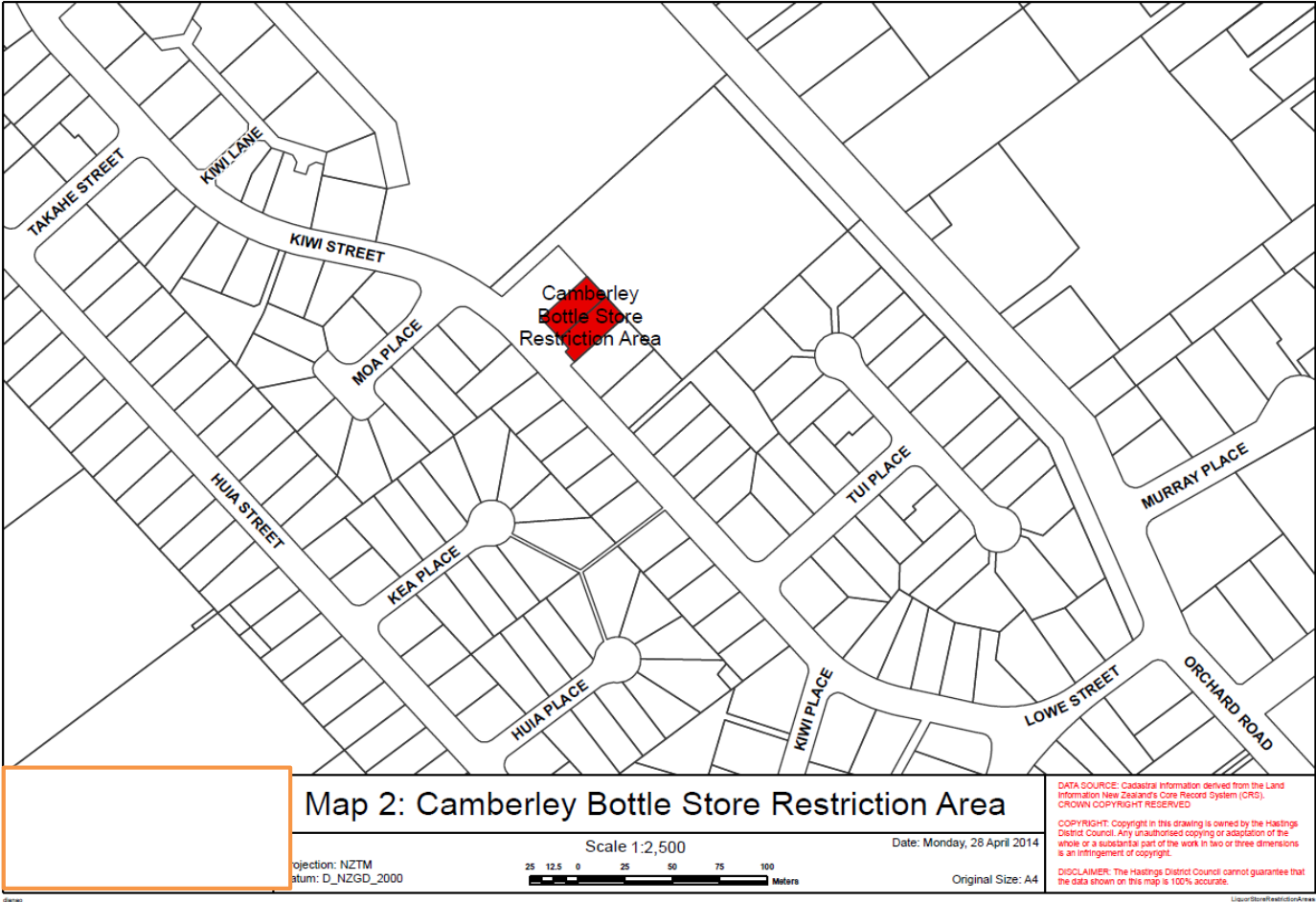
5.3 Special licences

- Restriction on the type of drinks sold, the alcohol percentage of the drinks and the type of containers the drinks are served in
- One way door restrictions
- Requirement of a separate line or service area for non-alcoholic beverages where the special licence is likely to have patrons that are under the legal drinking age.
- For Class 1 events:
 - Security Staff, porta loos and rubbish bins provided in the surrounding areas to assist with issues with amenity and good order.



- No full bottle wine sales for onsite consumption
- Serve reduction systems in place to manage intoxication levels
- Prescribed ratio of security staff to patrons
- High visibility clothing to be worn by security staff and be visible to others.
- Means of ingress/ egress for emergency services







6.0 DEFINITIONS

Alcohol	<p>A substance—</p> <p>(a) that—</p> <ul style="list-style-type: none"> (i) is or contains a fermented, distilled, or spirituous alcohol; and (ii) at 20°C is found on analysis to contain 1.15% or more ethanol by volume; or <p>(b) that—</p> <ul style="list-style-type: none"> (i) is a frozen liquid, or a mixture of a frozen liquid and another substance or substances; and (ii) is alcohol (within the meaning of paragraph (a)) when completely thawed to 20°C; or <p>(c) that, whatever its form, is found on analysis to contain 1.15% or more ethanol by weight in a form that can be assimilated by people (refer section 5(1) of the Act).</p>
Alcohol related harm	<p>(a) The harm caused by the excessive or inappropriate consumption of alcohol; and</p> <p>(b) includes-</p> <ul style="list-style-type: none"> (i) 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 (ii) 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 subparagraph (i) (refer section 5(1) of the Act).
Bottle store	Retail premises where at least 85% of the annual sale revenue is expected to be earned from the sale of alcohol for consumption somewhere else (refer section 31(1) of the Act).
Bar	In relation to a hotel or tavern, means a part of the hotel or tavern used principally or exclusively for the sale or consumption of alcohol (refer section 5(1) of the Act).
Brewery	A premises or a facility or establishment where beer is produced, brewed, and often packaged for sale.
Café	has the same meaning as restaurant in terms of the licence.



Cidery	A premises or facility or establishment where cider is produced. Cider is an alcoholic beverage made from the fermentation of apple juice (or sometimes other fruits).
Club	<p>A body that-</p> <ul style="list-style-type: none"> (a) Is a body corporate having as its object (or as one of its objects) participating in or promoting a sport or other recreational activity, otherwise than for gain; or (b) Is a body corporate whose object is not (or none of whose objects is) gain; or (c) Holds a permanent club charter (refer section 5(1) of the Act)
Class 1 Club	A club that has at least 1000 members of the purchase age and in the opinion of the TA, operates any part of the premises in the nature of a tavern at any time (refer section 5(6) Sale and Supply of Alcohol (Fees) Regulations 2013).
Class 2 Club	A club that has or applies for a club licence and is not a class 1 or class 3 club (refer section 5(6) Sale and Supply of Alcohol (Fees) Regulations 2013).
Class 3 Club	A club that has fewer than 250 members of the purchase age and operates a bar for no more than 40 hours each week (refer section 5(6) Sale and Supply of Alcohol (Fees) Regulations 2013).
Club licences	Where the licensee (e.g. a club) can sell and supply alcohol for consumption on the club premises by authorised customers (see section 21 of the Act).
Endorsed caterer	An on licence endorsed under section 38 of the Act. A holder of an on-licence that sells, for consumption there by people attending a reception, function, or other social gathering promoted by a person or association of people other than the holder, alcohol delivered from the premises the license is issued for.
Distillery	Premises or a facility where alcoholic beverages, such as whiskey, vodka, rum, gin, and other spirits, are produced through the process of distillation.
Entertainment Venue	Premises used or intended to be used in the course of business principally for providing any performance or activity such as but not limited to theatre, cinema, bowling, pool/snooker/billiard hall, brothel, function centre, wedding venue, live entertainment, adult entertainment.
Grocery Store	A shop that has the characteristics normally associated with shops of the kind commonly thought of as grocery shops where a range of food products and other household items are sold; with the

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principal business carried on is or will be the sale of food products (refer section 33(1) of the Act). Premises over 1,000 m² in size are generally considered supermarkets.

Hotel

Premises used or intended to be used in the course of business principally for providing to the public-

- (a) Lodging; and
- (b) Alcohol, meals, and refreshments for consumption on the premises (refer section 5(1) of the Act)

Night-club

has the same meaning as tavern in terms of the licence

On-licences

Licensee can sell and supply alcohol for consumption on the premises and can let people consume alcohol (see section 14 of the Act).

Off-licences

where the licensee sells alcohol from a premise for consumption somewhere else (see section 17 of the Act).

Pub

has the same meaning as tavern in terms of the licence

Remote Sales

Premises for which an off licence is endorsed under section 40 of the Act. Principally selling alcohol remotely, online, through a catalogue, email, mail system or similar. Purchase to be made at a distance from the licensed premises, to be delivered to the purchaser.

Restaurant

- Premises that-
- (a) Are not a conveyance; and
 - (b) Are used or intended to be used in the course of business principally for supplying meals to the public for eating on the premises (refer section 5(1) of the Act).

Special licences

Can be either on-site or off-site special licences. With an on-site special, the licensee can sell or supply alcohol, for consumption there, to people attending an event described in it. With an off-site special, the licensee can sell the licensee's alcohol, for consumption somewhere else, to people attending an event described in it (see section 22 of the Act).

Supermarket

Premises commonly thought of as a supermarket with a floor area of at least 1000m², including any separate departments set aside for such foodstuffs as fresh meat, fresh fruit and vegetables, and delicatessen items.



Tavern

- (a) A premises used or intended to be used in the course of business principally for providing alcohol and other refreshments to the public; but

- (b) does not include an airport bar (refer section 5(1) of the Act). (i.e., an airport bar is not treated as a tavern for alcohol licensing purposes).

Winery

An activity carried out on the same site as a vineyard involving wine making and cellar door sales (the retail sale of the wine produced on the site), and any related entertainment facilities including the serving of food and beverages (refer Hastings District Plan definitions section).

Hastings District

Local Alcohol Policy 2025

Preferred Position Paper



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Executive Summary

There is clear evidence that alcohol-related harm is present in the Hastings District, with high rates of both Alcohol related ED presentations and alcohol related police incidence. Māori, youth, and those living in areas of high socio-economic deprivation are disproportionately affected. There is a wealth of academic literature and national and international studies showing that policy measures targeting alcohol availability can significantly reduce harm.

In response, the Council proposed a range of policy changes through the draft Local Alcohol Policy (LAP), which was open for public consultation between 14 March and 14 April 2025, with hearings held on 16 April 2025. A series of meetings with stakeholders and community representatives were held to discuss the changes and were well attended. A total of 62 submissions were received, the majority from licensees (32 submissions received, out of approximately 259 licensees across the district), followed by members of the public (18 submissions), stakeholder organisations (10 submissions), and non-licensee businesses (2 submissions).

Overall, there was broad support for the proposed LAP. Some submitters sought clarification on specific provisions—such as the application of discretionary conditions—and identified minor legal refinements. The LAP is generally seen as an effective tool to reduce alcohol-related harm while balancing the need for a vibrant night-time economy and recognising the alcohol industry as a legitimate, regulated sector.

On-Licence Trading Hours

There was support for reducing on-licence trading hours. Nearly half of all submitters—and around 65% of those who answered—supported earlier closing times for nightclubs, bars, taverns, and pubs. Similar support was shown for reduction in hours for cafes, restaurants, wineries, and entertainment venues.

Many supported the proposed 2am closing for bars and 1am closing for restaurants and other venues. The proposed one-way door policy was also widely supported, with 79% in favour. Many submitters linked late-night trading with increased alcohol-related harm, citing health and emergency service data. Most viewed earlier closing times as a practical harm-reduction measure. While some raised concerns about economic impacts and personal freedom, the overall response supported a balanced and evidence-based approach.

Off-Licence Trading Hours

A reduction in off-licence hours was also supported. About 69% of submitters who answered the question supported shorter trading hours overall. For opening hours, 86% favoured a later start (9am or 10am) for bottle stores and similar retailers, with 59% supporting the same for supermarkets. 67% of submitters supported consistent trading hours across all off-licence types. Most preferred a 9pm closing time, with over half supporting an earlier closing (8pm or 9pm) for both supermarkets and other off-licenses. Many highlighted evidence and case law supporting reduced off-licence hours as a harm-reduction tool. Bottle stores and supermarkets were commonly identified as key sources of cheap alcohol and pre-loading. Some raised concerns about impacts on shoppers or convenience to shoppers.

Club and Special Licenses

Most submitters (73%) supported reducing licensed hours for clubs from 1am to midnight, noting many of these venues rarely stayed open late except for special occasions. Concerns were similar to those raised for other on-licence premises. Opinions on special licenses were more divided. Just over half (54%) supported including standardised hours in the LAP, while others preferred to retain flexibility for the District Licensing Committee to assess each event individually. Officers notes within the hours provision for special licenses there is discretion from the DLC.

Discretionary Conditions and Location Rules

Submitters broadly supported the discretionary conditions as long as they were tailored to the risk profile

of each licence application. This became more apparent through the hearings process. Discretionary conditions are seen as a valuable mechanism for addressing context-specific risks, provided it is applied judiciously rather than in a blanket or in a heavy-handed manner. Submitters emphasized that such conditions should not be routinely imposed, but rather used where clearly warranted. Based on feedback received, the wording of certain discretionary conditions has been revised and subjected to legal review.

There was also strong support for location-based rules, particularly those restricting new licenses in areas with high levels of alcohol-related harm. These provisions were viewed as essential for proactive risk management and for safeguarding community wellbeing.

Consistency with Napier City Council

Throughout this LAP review process, officers have remained mindful of the potential for divergence with Napier City Council (NCC) and the potential unintended consequences that may result. As occurred during the development of the 2019 LAP, this divergence may have again occurred at the same point in the process. Currently, Napier officers—under direction from their elected members—have indicated they may be seeking to revert to the more permissive policy provisions of the 2019 LAP.

Differences in policy, particularly in relation to trading hours for taverns, bars, and nightclubs, carry some potential risks. These include the potential for patron migration between areas with the possibility of increased harm, and the creation of an uneven commercial playing field. However, several factors could mitigate these risks: the number of premises affected is small, meaning a limited population is likely to be impacted; and migration may already be occurring, driven by personal preference rather than policy differences.

While these risks are important to consider, the overall impact remains uncertain. A range of factors, issues, and mitigation options are explored in Section 4 of this document.

Conclusion

The evidence suggests that reducing alcohol-related harm is best achieved through a combination of policy provisions that work together. This draft LAP presents a robust coordinated set of measures that build on the existing policy, strengthen its impact, and reflect both strong evidence and community input.

The continued endorsement from statutory stakeholders and field experts highlights the LAP's importance as a tool to ensure alcohol is sold, supplied, and consumed safely and responsibly across the Hastings District and that harm from the excessive or inappropriate consumption of alcohol is minimised.

SECTION ONE: INTRODUCTION

1.0 Purpose of the Report

- 1.1 This document is designed to provide information, context and summarise the evidential basis to support the Hastings District Council's decision-making process regarding the review of its Local Alcohol Policy (LAP).
- 1.2 The report is in two parts, Part One is analysis of the submissions received and hearings process, as a part of the Special Consultative Procedure, as required by The Sale and Supply of Alcohol Act 2012 and Section 87 of the Local Government Act 2002.
- 1.3 Part Two details the summary of evidence, preferred position, and reasoning for the proposed final draft LAP.
- 1.4 This document should be read in conjunction with the Issues and Options Paper, Research Report and Council reports to form a fully comprehensive policy position.

2.0 Structure of the Report

- **Section 2:** Provides background information on the SSAA 2012 and the review process for LAP to date including the provisions within the current LAP 2019 and council decisions.
- **PART ONE - Section 3:**
 - Analysis of the Submissions received as a part of the SCP
 - Key themes from: Stakeholder, Licensee, Community and other businesses submissions received as a part of the SCP
 - Hearings Analysis by submitter
- **PART TWO - Section 4:** Conclusions and final recommendations including final comments regarding consistency with Napier City Council.
- **Appendix One:** Submissions spreadsheet
- **Appendix Two:** Submission Binder

SECTION TWO: SALE AND SUPPLY OF ALCOHOL ACT 2012

1.0 Sale and Supply of Alcohol Act 2012

- 1.1 The object of The Sale and Supply of Alcohol Act 2012 is:
 - (a) That 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.
- 1.2 Harm is defined very widely and includes any crime, damage, death, disease, disorderly behaviour, illness, or injury to individuals or the community either directly or indirectly caused by excessive or inappropriate alcohol consumption.
- 1.3 Under the SSAA 2012, Territorial Authorities are able to develop Local Alcohol Policies (LAPs), and Section 77 of the Act sets out the licensing matters that can be addressed through a LAP, these are:
 - Location of licensed premises by reference to broad areas
 - Location of licensed premises by reference to proximity to premises or facilities of particular kinds
 - Whether further licenses (or licenses of a particular kind or kinds) should be issued for premises in the district concerned, or any stated part of the district
 - Maximum trading hours
 - The issue of licenses, or licenses of a particular kind or kinds, subject to discretionary conditions.
 - One-way door restrictions.
- 1.4 LAPs cannot include policies on matters unrelated to licensing such as the price of alcohol, age limits for drinking or alcohol advertising and sponsorship.
- 1.5 Section 78 of the Act requires that if a territorial authority decides to develop a LAP it must have regard to:
 - The objectives and policies of its district plan
 - The number of licenses of each kind held for premises in its district, and the location and opening hours of each of the premises
 - Any areas where bylaws which prohibit alcohol in public places are in force
 - The demography of the district's residents
 - The demography of people who visit the district as tourists or holiday makers
 - The overall health indicators of the district's residents
 - The nature and severity of the alcohol-related problems arising in the district.
- 1.6 As per the SSAA 2012 Section 97 a Territorial Authority must review the policy utilising the Special Consultative Procedure no later than 6 years after it came into force and no later than the 6 years after the most recent review was completed.
- 1.7 When reviewing a LAP, the territory authority has to follow the process as if it were the adoption of a new LAP (Section 95 - SSAA 2012).

2.0 Council Decision

- 2.1 A decision was made in 2013 by Napier and Hastings Councils to collaborate on a joint Local Alcohol Policy (LAP) in accordance with Section 76 of the Sale and Supply of Alcohol Act (SSAA) 2012.
- 2.2 The joint LAP was developed over several years, spanning from 2012 to 2017. During this period, a Special Consultative Procedure (SCP) was conducted in 2013 to engage stakeholders and gather public input as part of the policy formulation process.

- 2.3 The LAP received approval from both councils, and it was subject to appeals from three parties. Following extensive negotiations, a settlement was reached, allowing the LAP to take effect in August 2019, with specific provisions regarding hours of operation coming into force in November 2019.

3.0 LAP provisions (2019)

- 3.1 The LAP includes the following provisions:

- **Hours for on licenses**
 - Taverns / Bars / pubs – 8.00 am to 3.00 am Monday to Sunday (one way door from 2.00 am)
 - Cafes / restaurants / wineries – 8.00 am to 2.00 am Monday to Sunday
 - Entertainment venues - 8.00 am to 2.00 am Monday to Sunday
- **Hours for Off licenses**
 - Grocery Stores / Supermarkets - 7.00 am to 10.00 pm Monday to Sunday
 - All other off licenses – 9.00 am to 10.00 pm Monday to Sunday
- **Hours for Club Licence** – 8.00 am to 1.00 am Monday to Sunday
- **Hours for Special licenses** – as per appropriate to the event
- **Location of licensed premises** – protection for vulnerable communities
 - No further off-licenses are to be issued for any premises being a **bottle store** on land located within: Flaxmere Commercial Service or Suburban Commercial zone or Flaxmere Village Centre Zone / Camberley / Maraenui
- **Discretionary conditions** – various provisions which are guided by the principles of;
 - CONNECTION – whether there is a connection between the problem to be addressed and the proposed activity
 - IMPACT – whether in the opinion of the District Licensing Committee the proposed condition will contribute to making the drinking environment safer and minimize harm
 - REASONABLENESS – whether it is within the capabilities of the applicant or licensee to satisfy this condition.
 - Examples of discretionary conditions include – CCTV, Lighting, no glass serves, limit on drink sizes and type at events.

4.0 LAP Review

- 4.1 When the LAP was adopted, both councils resolved that a “review be considered in three years after the policy becomes operative with a full review required within 6 years of the enforcement date.” (Ref: 19/607).
- 4.2 In a full council meeting on the 13th July 2021 both councils agreed to a 6-year review.
“That the Council approve a review of the Hastings District Council and Napier City Council Local Alcohol Policy in six years (commencing October 2024) or sooner if required, as per Section 97 of the Sale and Supply of Alcohol Act 2012.”
- 4.3 At a Full council meeting on the 24th of October 2024 Council resolved to transition to an individual LAP as part of the review process to simplify administration and improve efficiencies. Officers recommended this approach as it captures efficiency gains whilst enabling the two Councils to

administer policies and collaboratively contribute to reductions in alcohol related harm in Hawke's Bay.

- 4.4 On the 18 February 2025 the Council adopted the first draft Hastings District LAP and approved the Special Consultative Procedure (SCP) to begin on the 14th of March 2025.
- 4.5 The first draft of the LAP, based on evidence and initial council and statutory stakeholder engagement, included a reduction in hours for all licence types and the addition of discretionary conditions.
- 4.6 A Joint LAP Working reference group, made up of three councilors and a Council officer from each council, was formed with Napier City Council to help with consistency between the two policies where required.

PART ONE

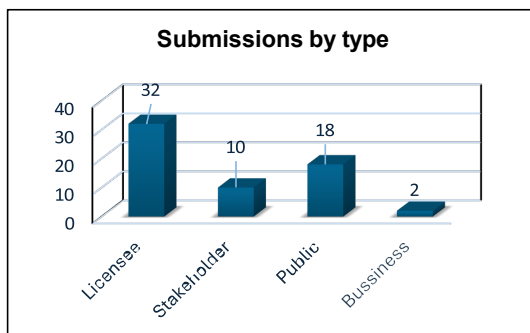
SECTION THREE: SUBMISSION AND HEARINGS ANALYSIS

1.0 Special Consultative Procedure (SCP)

- 1.1 On 14 March 2025 public notice was given of the first draft LAP and the SCP began.
- 1.2 The communications department of council completed two media releases, advertised on My Hastings, on the council website and Facebook and created a My voice my choice platform page to receive submissions.
- 1.3 The consultation pack containing the Statement of Proposal, Statement of Information, the First Draft LAP, Issues and Options Paper, Research Report and Submission Form were distributed to all licensees, stakeholders and interested parties.
- 1.4 The Hastings, Havelock North and Flaxmere libraries, as well as Council Offices all had copies of the consultation pack and submission boxes available to receive submissions.
- 1.5 The following consultation meetings occurred:
 - 18 March 2025 – Heretaunga Takoto Noa Māori Standing Committee Meeting
 - 26 March 2025 - Licensee meeting
 - 31 March 2025 –Stakeholder meeting / Public meeting
 - 2 April 2025 – Drop in Q&A session
- 1.6 The youth council was also contacted and chose not to have an individual meeting as such, they attended the general stakeholder meeting and have submitted on the policy.
- 1.7 All the meetings were reasonably well attended and are detailed in the analysis section of this report.

2.0 Submissions received

- 2.1 There were 62 submissions received, 44 representing organisations, 32 of those were licensees (Shed 530 submitted 3 submissions and there were 2 submissions received from Stortford Lodge Club, one of which was in error and has been deleted as per discussion with the submitter).
- 2.2 10 general stakeholders submitted, of which, 4 representing tourism, restaurant or hospitality associations and 4 public health / NZ Police, the HDC inspector and youth council. There were 18 submissions from members of the public.

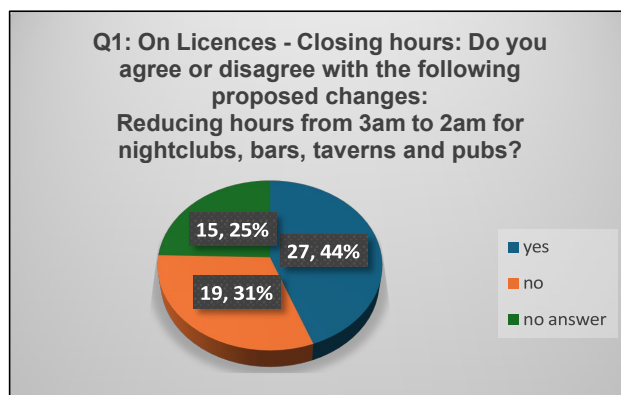


3.0 Overall feedback analysis

- 3.1 This section is divided by LAP policy submission question, for all the submissions received, then details analysis by submitter type (Stakeholder, Licensees, Members of the public, other businesses).
- 3.2 The below details analysis of all the submissions (61, as one duplicate was deleted) received to each question within the questionnaire.
- 3.3 Please note the 'red boxed bold text' is the 'take away and final result' from each question in the questionnaire.
- 3.4 Substantial submissions are also included in the analysis below, where the submitter stated a definite position on each question. Where a submitter did not directly answer the question within the questionnaire or substantial submission, it was noted as 'not answered'. (Please see Appendix One for Submission Summary Spreadsheet or Appendix Two for the actual submissions.)

3.5 Hours Provisions - On Licence hours - Closing hours

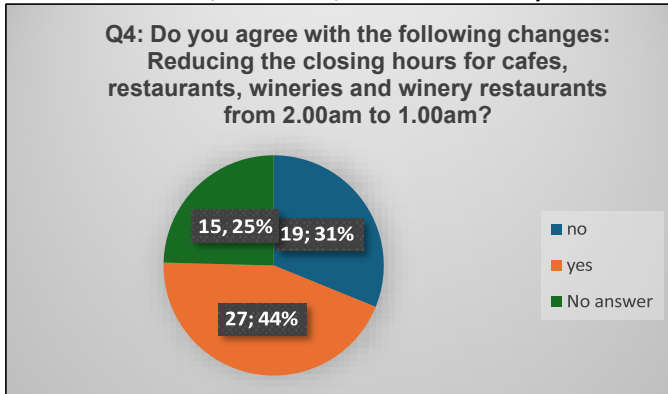
- 3.5.1 **Question 1: Do you agree or disagree with the following proposed changes: Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?**



- 3.5.2 Analysis shows that 27 (44%) of the 61 submitters agreed with this change to reduce hours. There were 19 who stated they did not agree with the reduction in hours, however of those, 3 selected 'no' and they requested further reduced hours than the proposed draft LAP (submitters answered 1am and 11pm).
- 3.5.3 Therefore, in essence, 30 respondents of the total 61 want reduced hours to on licence nightclubs, taverns, bars and pubs.
- 3.5.4 Of those who answered the question, 65.2% want reduced hours to on licence nightclubs, taverns, bars and pubs.

**49.2% of submitters wanted reduced trading hours for nightclubs, bars, taverns and pubs.
AND
Of those who answered the question, 65.2% want reduced hours to on licence nightclubs, taverns, bars and pubs.**

3.5.5 Question 4: Do you agree or disagree with the following proposed changes: Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2am to 1am?



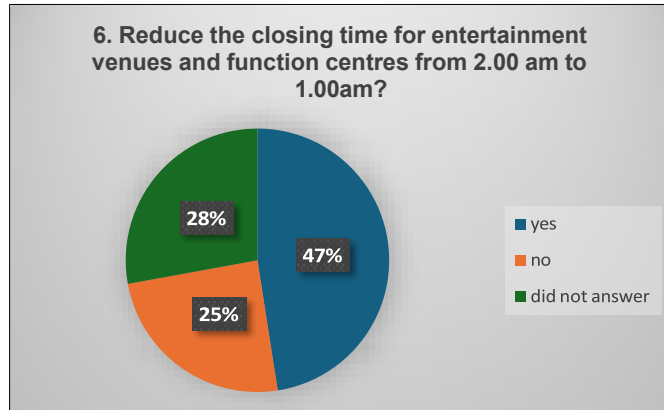
3.5.6 Analysis shows 44% agreed that reducing hours was appropriate for this licence type. 31% (19) disagreed with the reduction, however 5 submitters chose 'no' and indicated a further reduction to hours to 12am and 11pm.

3.5.7 Therefore, in essence 32 of the 61 submitters wanted reduced hours (52.4%).

3.5.8 Of those who answered the question, 69.6% wanted further reduced hours than the current LAP, for cafes, restaurants, wineries and winery restaurants.

52.4% of submitters wanted reduced trading hours for restaurants, wineries and winery restaurants.

3.5.9 Question 6. Do you agree or disagree with the following proposed changes: Reduce the closing time for Entertainment venues and function centres from 2am to 1am?

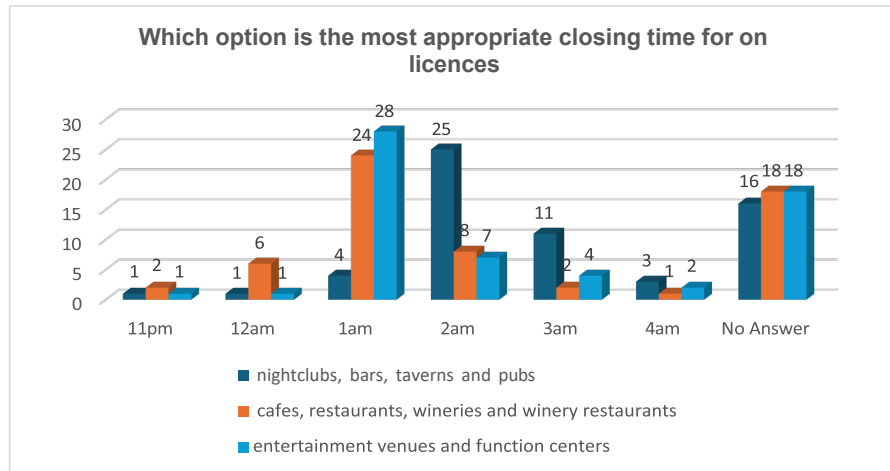


3.5.10A larger proportion of submitters thought an earlier closing for entertainment venues was appropriate (47%), 25% or 15 submitters stated no, however 1 submitter within that group suggested an earlier closing of 11pm.

3.5.11 In essence, therefore, 30 submitters wanted reduced hours for this category of on licenses.

49.2% of submitters wanted reduced trading hours for entertainment venues and 65.9% of those who answered the question, wanted reduce hours for this licence type.

3.5.12 Question 2. Which option is the most appropriate closing time for on licenses: 11 pm 12am 1am 2am 3am 4am?

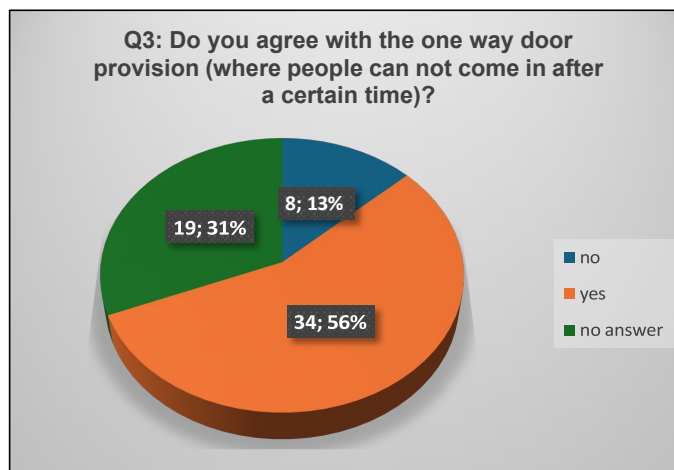


3.5.13 For nightclubs, bars, taverns and pubs 2am was the most supported closing time (25 submitters of 61), for café, restaurants and wineries 1am was the most supported option (24 of the 61 submitters) and for entertainment and function venues 1am was the most supported option (28 submissions of the 61), showing general support for the draft policy position for on licence hours within the draft LAP.

3.5.14 Also noting between 25-30% of submitters did not answer these specific questions, meaning, of those who answered the questions, approximately 56% of submitters agreed with the proposed LAP hours of 2am for nightclubs, taverns, bars and pubs and 1am for cafes, restaurants, wineries etc.

Approximately 56% of submitters who answered the questions, agreed with the proposed LAP hours of 2am for nightclubs, taverns, bars and pubs and 1am for cafes, restaurants, wineries, entertainment venues etc.

3.5.15 Question 3. Do you agree with the one-way door provision (where people cannot come in after a certain time).



3.5.16 The majority supported the one-way door restrictions within the proposed LAP, however a large proportion 19 of 61 submitters did not answer this question, therefore of the 43 submitters who answered this question, 34, or 79% agreed with the one-way door provision.

79% of submitters who answered this question agreed with the one-way door provision.

3.5.17 General comments made regarding on licence hours included:

Alcohol-Related Harm

- Submitters emphasized that individuals purchasing alcohol late at night are more likely to be heavy or risky drinkers, making this window a critical period for harm prevention.
- Submitters supported reducing on-licence trading hours due to the strong association between late-night alcohol availability and alcohol-related harm.
- ED and police data were referenced by submitters, showing a significant rise in incidents after 7pm, with peak harm occurring between 12am and 3am, particularly on weekends.
- Submissions cited both New Zealand and international research, consistently linking shorter trading hours to: Lower rates of hospital admissions / Reductions in alcohol-related violence / Decreased public disorder and community harm.
- The 2013 introduction of national maximum trading hours was highlighted as a successful policy, resulting in fewer physical assaults and alcohol-related ED presentations.
- Submitters noted, while causality is difficult to definitively prove, a drop in Hasting's alcohol-related ED cases has been observed since the last Local Alcohol Policy (LAP) was introduced in Napier and Hastings.
- A precautionary approach was endorsed, with reduced hours seen as a responsible measure to improve safety and wellbeing, especially in areas with active nightlife.
- A small number of submissions challenged the causality of the evidence.
- Submitters noted that reduced trading hours should not be viewed as punitive, but as part of a broader, evidence-informed harm-reduction strategy.
- Others emphasized most harm occurs in private homes, not well-managed licensed venues.

Public Safety and Community Wellbeing

- Reducing trading hours was supported to promote safer public environments, reduce late-night disturbances, and prioritize community wellbeing.
- Supporters of reduced hours believe they align with public health goals and existing regional practices.

Economic and Social Impacts

- Concerns were raised about the negative financial impact on hospitality businesses, especially given the current downturn and reliance on tourism.
- A submitter stressed that many young people rely on late-night hospitality jobs, and reducing hours could cut income and opportunities.

Freedom and Choice

- Some submitters valued individual freedom of choice, arguing that later hours allow personal responsibility and should remain available for those who choose to be out late.
- Submitters noted that some venues voluntarily close early to avoid issues that occur later at night.

Licence Type Specificity

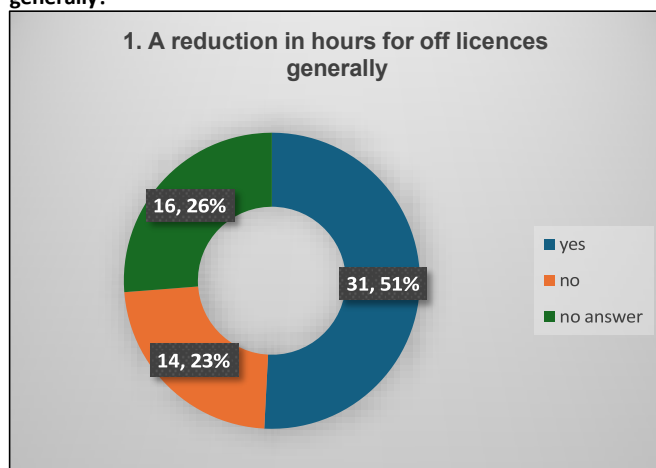
- A recurring suggestion was to tailor trading hours to specific types of on-licenses, rather than using a one-size-fits-all approach. Officers note this is what has been proposed.

General Observations and Preferences

- “Nothing good happens after 10pm.”
- “Who eats at 1am?”
- Others noted that only around 5% of on-licence holders would be impacted by proposed changes.
- “A well-run licensed venue plays a key role in supporting safe and responsible consumption of alcohol.”
- A community survey showed that 51% of respondents wanted shorter opening hours for bars and pubs.
- Submitters noted the proposed reduced hours are in keeping with other TLAs in Hawke’s Bay (Wairoa: 9am to 1am for on-licenses, Central Hawke’s Bay: 8am to 1am for on-licenses).

3.6 Hours Provisions - Off Licence hours

3.6.1 Question 1. Do you agree with the following proposed changes: A reduction in hours for off licenses generally?

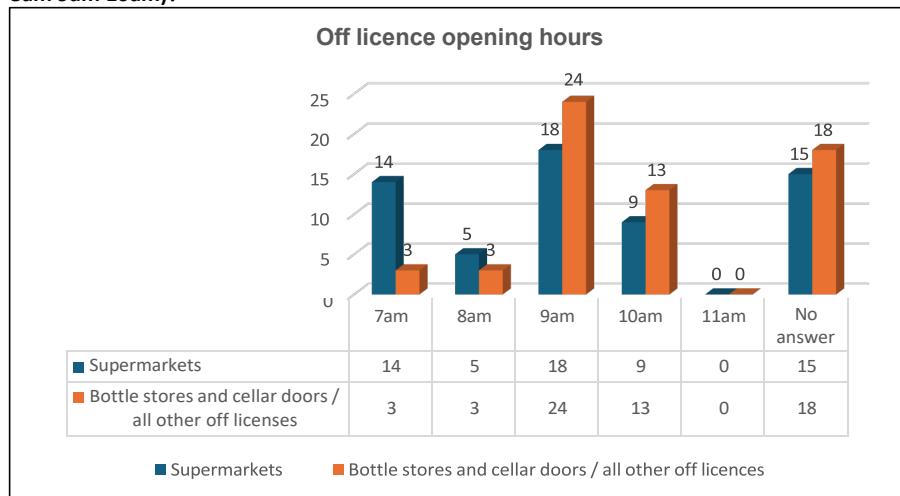


3.6.2 31 submitters (68.9% of those who answered the question) agree with the reduction in off licence hours generally. Of those who answered this question, over double the submitters supported the reduction in hours for all off licenses.

The majority, or 68.9% of those who answered the question, agree with the reduction in off licence hours generally, noting 16 of the 61 submitters did not answer this question.

3.7 Hours Provisions - Off Licence hours – Opening hours

3.7.1 Question 2 and 3. Which is the most appropriate opening time for off licenses by category, (7am 8am 9am 10am)?



3.7.2 A larger proportion of submitters supported 9am followed by 7am for opening times for supermarkets and 9am followed by 10am for all other off licenses.

3.7.3 Of those who answered the question, 39.1% supported supermarket off licence opening hours of 9am, and a further 19.6% preferring an even later opening hour of 10am.

3.7.4 Of those who answered the question, 30.4% preferred a 7am opening hour for supermarkets.

3.7.5 For all other off licenses, for those who answered the question, 55.8% preferred a 9am opening and 30.2% preferred a 10am opening.

3.7.6 For Supermarkets, of those who answered the question, 58.7% agreed with a later opening hour (9am or 10am) than the current LAP hours (7am).

3.7.7 For Bottle Stores and all other off licenses, of those who answered the question, 86% agreed with later opening hour of 9am or 10am.

3.7.8 Noting 15 (for supermarkets hours) and 18 submitters (Bottle stores and other off licenses) did not answer this question.

3.7.9 Clarification on Question Interpretation; It should be noted that during the submission period, officers were made aware that this question may have been misleading. Some submitters could have interpreted it as referring to general supermarket opening hours, rather than alcohol licensing hours specifically. Multiple comments indicated that the question should have clarified that it referred only to the hours during which alcohol sales are permitted, and that supermarkets may still open earlier to sell non-alcoholic grocery items. This may have affected the outcome of this question.

For Supermarkets, of those who answered the question, 58.7% agreed with a later opening hour (9am or 10am) than the current LAP hours (7am).

For Bottle Stores and all other off licences, of those who answered the question, 86% agreed with later opening hour of 9am or 10am.

3.7.10 Question 4. Do you think supermarkets should have the same hours as all other off licenses (i.e. The same hours as bottle stores and cellar doors)?



3.7.11 A higher proportion of submitters supported aligning supermarket alcohol licensing hours with those of other off licenses.

3.7.12 A large proportion of submitters did not answer the question (18 of 61 submitters).

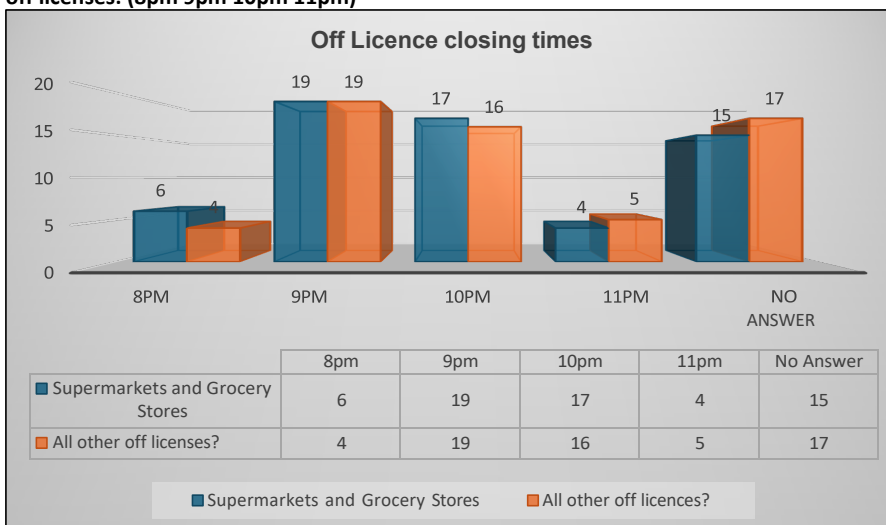
3.7.13 Of those who answered this question, over double the submitters supported the same hours for all off licenses.

Among those who answered this question, 67.4% agreed that supermarkets should have the same hours as all other off licences.

Support outnumbered those opposed by just over two to one.

3.8 Hours Provisions - Off Licenses - Closing hours

3.8.1 Question 6 and 7. Which option is the most appropriate closing time for supermarkets and other off licenses: (8pm 9pm 10pm 11pm)



- 3.8.2 A higher number of submitters selected 9pm as the most appropriate alcohol licensed closing time for both supermarkets and other off licenses. This was closely followed by 10pm for both licence categories.
- 3.8.3 Among those who responded to the question, 41.3% supported a 9pm licensed closing time for supermarkets, while 43.2% supported 9pm for other off licenses.
- 3.8.4 Among those who responded to the question, the second most preferred option was 10pm, receiving support from 36.9% of submitters regarding supermarket alcohol licensing hours and 36.4% for other off licenses.
- 3.8.5 Of those who answered the question, 54.3% of submitters wanted an earlier licensed closing hour for supermarkets (8pm or 9pm).
- 3.8.6 Of those who answered the question, 52.3% of submitters wanted an earlier licensed closing hour for other off licenses.
- 3.8.7 Again, it should be noted this question may not have been written well, officers were made aware that this question may have been misleading. Some submitters could have interpreted it as referring to general supermarket closing hours, rather than alcohol licensing hours specifically. Multiple comments indicated that the question should have clarified that it referred only to the hours during which alcohol sales are permitted, and that supermarkets may still close later to sell non-alcoholic grocery items. This may have affected the outcome of this question.

For both supermarkets and other off licenses, 9pm was the preferred option, closely followed by 10pm. Of those who answered the question, 54.3% of submitters wanted an earlier licensed closing hour for supermarkets (8pm or 9pm) and 52.3% wanted an earlier closing for other off licenses.

- 3.8.8 Final comments made by submitters for off licence hours include:
- Consistency Across Off-Licence Types
- Some submitters felt supermarkets should have shorter hours than bottle stores.
 - Others called for equal hours across all off licenses (including supermarkets, bottle stores, and cellar doors) to ensure fairness and consistency in harm prevention measures.
 - One comment argued that alcohol should not be sold in supermarkets at all due to concerns over normalisation and easy access.
 - Supermarkets emphasized that supermarkets main sale is food not just liquor.
- Convenience
- Supermarkets emphasized that supermarket extended hours is for convenience, such as childcare / family commitments considerations and it reflects customer needs.
 - Supermarkets highlighted that sometimes customers are still completing their purchases after 9pm, even though the store may be officially closed.
- Alcohol-Related Harm and general evidence
- Multiple submissions stressed that longer trading hours increase the availability of alcohol, contributing to harm.
 - Several submitters expressed concerns that supermarkets selling alcohol for extended hours undermines community harm-reduction efforts.
 - Supermarkets were seen as facilitating pre-loading and side-loading, especially due to their low prices.
 - Submissions cited that over 80% of alcohol is purchased from off licences, supporting arguments to reduce availability through shorter hours.
 - A recent study was referenced, suggesting that stricter off-licence controls could reduce alcohol consumption by 17.9% and increase national health-adjusted life years (HALYs) by 450,000.

- Analysis has shown no substantive difference in harm between supermarkets and other off licence outlets.
- Health NZ encourages Council to consider reducing the closing time further to 8pm based on more recent evidence.
- The Supreme Court ruling in 2023 on Auckland Council's Provisional LAP showed that a 9pm closing time (for off-licence premises) was not unreasonable in light of the Object of the Act and likely to reduce alcohol-related harm. The Supreme Court was not required to consider a 9am opening hour because the Council withdrew that element following the ARLA hearing.
- Some submitters noted a lack of evidence or concerns that reduction in hours would be ineffective.

Reasonableness and legal arguments

- Statements were made that even with the no right of appeal, provisions should still be reasonable and proportionate.
- Sufficient evidence should be available to support a reduction in hours, particularly for the morning hours.

Community Feedback and National Trends

- A Hastings community survey found that 54% of respondents support shorter trading hours for supermarkets.
- 51% of respondents to a Hastings survey viewed supermarkets as a key source of alcohol-related harm.
- Submitters pointed out that proposed changes are aligned with other Local Alcohol Policies (LAPs) in Hawke's Bay: Wairoa: 10am–9pm for off licences / Central Hawke's Bay: 9am–11pm.
- Trading hour reductions were viewed as part of a nationwide trend towards limiting alcohol availability through off licenses.
- The majority of Hastings supermarkets and grocery stores close at 9pm.

Health, Safety, and Social Impact

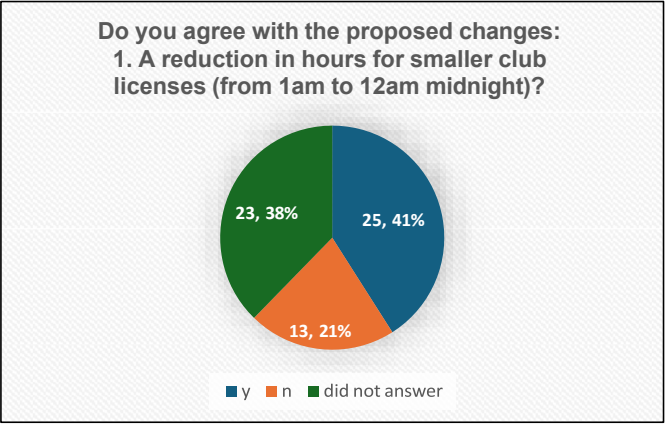
- Reducing hours was seen to curb hazardous drinking patterns like pre-, side-, and post-loading, which contribute to assaults, unintentional injuries and drink driving.
- Some comments emphasised that limiting trading hours supports those trying to reduce their alcohol consumption, those with addiction issues or those who do not drink alcohol, enabling people to shop for groceries without being exposed to alcohol. Parallels were drawn to "quiet hours" initiatives that create more inclusive retail environments (e.g. for neurodivergent individuals).

Question framing

- The questions regarding supermarket hours could have easily been mis-interpreted as the closing time for supermarkets in general, however the intent here is only in relation to alcohol sales. Supermarkets can continue to operate as they wish regarding the sale of general goods. This may have affected submission answers.

3.9 Hours Provisions - Club Licence Hours

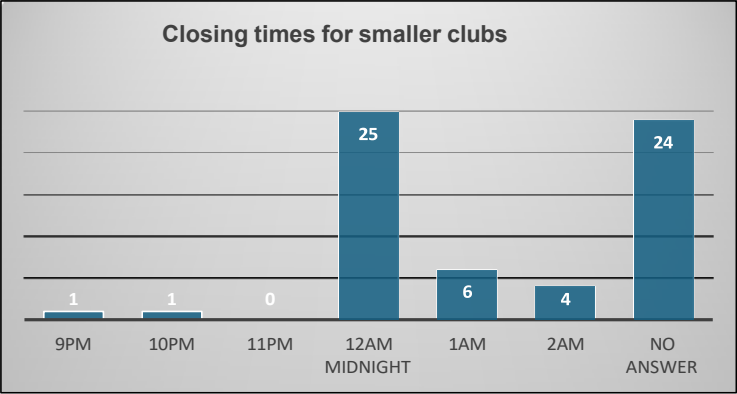
3.9.1 Question 1. Do you agree with the proposed changes: A reduction in hours for smaller club licenses (from 1am to 12am midnight)



- 3.9.2 A larger proportion (25 Submitters) stated they agreed with the reduction of hours from 1am to 12am midnight for smaller clubs. Of those who answered the question 65.8% agreed with the proposition.
- 3.9.3 Of those who did not agree one submitter stated 'no' and put 9pm and another stated yes then stated an earlier closing time of 10pm as the preferred closing time.
- 3.9.4 An additional 2 submitters put 'no', then stated 12am midnight as the preferred closing time for club licenses.
- 3.9.5 In essence there were 28 that agreed with the club licence closing hours of 12am midnight or earlier closing time.

A large proportion did not answer this question (23)
Of those who answered the question 65.8% agreed with the reduction of hours for small clubs.

3.9.6 Question 2. If no, which option is the most appropriate closing time: earlier than 9pm, 9pm 10pm 11pm 12am 1am 2am



- 3.9.7 The largest proportion chose 12am midnight (25 submitters) followed by 1am (6 Submitters).
- 3.9.8 A large proportion did not answer the question.
- 3.9.9 Of those who answered the question 65.8% agreed with the reduction of hours for small clubs from 1am to 12am midnight.

3.9.10A total of 73% of those who answered the question, wanted earlier closing times for small club licenses, than that in the current LAP (1am).

A large proportion did not answer the question.

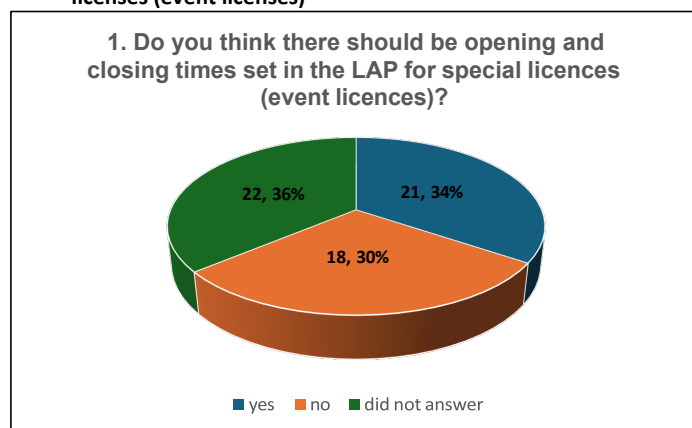
A total of 73% of those who answered the question, wanted earlier closing times for small club licenses, than that in the current LAP (1am).

3.9.11 Other comments and themes

- Convenience - What about New Year's Eve or special occasions. We would probably use the 1am closing maybe twice a year. But it is always nice for that extra hour if needed.
- A reduction in club hours can play a key role in reducing alcohol-related harm, particularly late at night when the risk of incidents like violence, disorder, and accidents is higher. Shortening club hours encourages more responsible drinking habits and helps protect both club members and the wider community. It also supports emergency services and healthcare providers by lessening the strain during peak hours.
- Longer hours increase the potential for alcohol related harm due to greater availability.

3.10 Hours Provisions - Special Licences

3.10.1 Question 1. Do you think there should be opening and closing times set in the LAP for special licenses (event licenses)



3.10.2 Of those who answered the question; 53.8% (21 Submitters) agreed with an opening or closing time for special licenses, 46% (18 Submitters) disagreed.

3.10.3 36% of submitters did not answer this question.

Of those who answered the question, 53.8% (21 Submitters) agreed with an opening or closing time for special licenses.

A large proportion did not answer this question (22 out of 61)

3.10.4 Other comments / themes

Support for Event-Specific hours and discretion

- Many submitters agreed that hours should be set appropriately for the specific activity or event on a case-by-case basis acknowledging the diverse nature of events.
- It was noted that events like the Rugby World Cup were cited as examples where national legislation can allow temporary exceptions, reinforcing that the LAP provides guidance rather than rigid rules.

Managing Alcohol-Related Harm

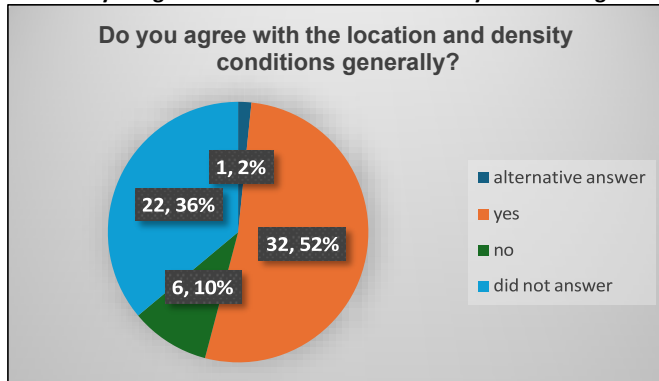
- Submissions emphasized that special licence hours play a key role in managing alcohol-related harm, especially at large or late-night events.
- Hours for events gives local authorities better control over late-night events where the risk of harm is higher.
- Setting reasonable hours helps protect public safety, reduces the potential for disorder, and ensures events remain enjoyable and safe for everyone involved.
- Some respondents noted that inappropriate or extended trading hours for events could increase the risk of harm, similar to other licence types.

Clarity and Consistency

- Clear and consistent trading hours were seen as important for setting expectations for event organisers

3.11 Location Provisions

3.11.1 Do you agree with the location and density conditions generally?



3.11.2 The majority agreed with the location provisions regarding no further bottle stores for both Flaxmere and Camberley. Very few disagreed (6) and Council received one alternative answer.

Of those who answered the question, 82% agreed with the location and density provisions.

3.11.3 Other comments and themes:

Alcohol Availability and Outlet Density

- Hastings has too many alcohol outlets, particularly off licenses, with availability 30% above the national average, equating to one licence for every 331 Hastings residents, compared to one for every 434 residents nationally.
- Hastings has 111 off licenses—more than services like pharmacies.
- The high density of off licenses contributes to shorter travel distances, longer opening hours, and price competition.
- Research has also shown that the density of supermarkets and grocery stores selling alcohol is associated with a range of alcohol-related harms across the North Island.

Alcohol-Related Harm and Public Health

- High availability raises concerns about community-wide alcohol-related harm.
- Off licenses contribute significantly to alcohol-related harm, with 76% of alcohol consumed by hazardous drinkers purchased from these premises.
- A study on alcohol-related emergency department presentations found the most common place patients purchased alcohol was from off license premises.

- Alcohol harm is widespread across Hastings and occurs across demographics.

Community Impact and Youth Wellbeing

- Flaxmere and Camberley have high populations under 25; restricting new off licences supports youth wellbeing.
- Reducing visibility and availability of alcohol may help shape healthier drinking habits among young people.
- Creating a safer environment shows care for community wellbeing and encourages positive youth development.

Policy Support and Suggestions for Expansion

- Support for existing restrictions in areas like Flaxmere and Camberley.
- Calls to expand restrictions (e.g., sinking lid policy) to all of Hastings or additional suburbs like Akina, Mayfair, and St Leonards.
- Support for proximity rules to reduce clustering of licensed premises.

3.11.45. Licensing and Regulatory Clarity

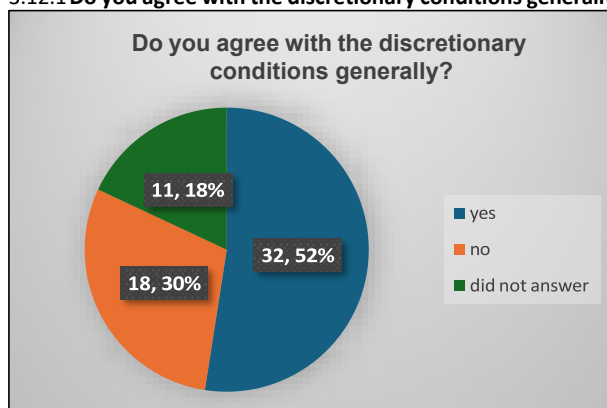
- Support for a case-by-case approach near sensitive sites.
- Support for distinctions between types of off licenses.
- Value in providing clear and certain guidance for licence applicants.

3.11.56. Community Opinion

- 61% of Hawke's Bay residents support reducing the number of bottle stores, based on survey data.

3.12 Discretionary Conditions

3.12.1 Do you agree with the discretionary conditions generally?



3.12.2 Most (52%) submitters agreed with the discretionary conditions generally.

3.12.3 Of those who answered the question 64% agreed and 36% disagreed.

3.12.4 It should be noted that Council received 3 submissions from Shed 530, all stating the same comments and answer for this question. There were also two submissions received from the same person, representing two events that also answered this question.

3.12.5 Therefore, if officers were to count those submissions as one for each of those who answered this question, rather than 3 and 2, there would be 15 submitters (instead of 18 submitters) that did not agree with the discretionary conditions.

Of those who answered the question 64% agreed and 36% disagreed.

3.12.6 Other comments and themes:

- **Discretionary Conditions – Concerns and Need for Clarity**
 - Feedback from multiple submitters suggests a misunderstanding of the nature of discretionary conditions, with comments indicating they are being interpreted as mandatory when they are not.
 - Multiple submitters had concerns with discretionary conditions being routinely imposed without genuine discretion.
 - Submitters emphasized that such conditions should be applied on a case-by-case basis, reflecting the specific circumstances of each application as required by law.
 - There is a call for clearer definitions and guidance to ensure a consistent and accurate understanding of what constitutes a discretionary condition and how it should be applied.
 - A few submitters raised concerns regarding the discretionary conditions' guidance.
- **Special licence discretionary conditions:**
 - Patron Experience & Event Flexibility**
 - Strong support for the consideration of the patron experience.
 - Flexibility in serving rules is seen as essential for effective crowd management and event success.
 - Overly rigid conditions could negatively affect the district's reputation, deterring future events and impacting the local events and hospitality industry.
 - Emphasis that not all events or audiences are the same; a one-size-fits-all approach is inappropriate.
 - Suggestions for more inclusive event environments, such as clearly defined non-alcoholic zones or spaces for minors.
 - Serving Limits & Alcohol Content**
 - Calls to retain the current 4-to-2 drink serve limits for Class One events rather than introducing stricter limits. (With higher alcohol content products, applying a blanket % limit would be inappropriate especially where the events may have a cocktail or spirit focus (Gin festivals, etc.).)
 - Operational challenges noted with enforcing strict serve limits at the start of large-scale events.
 - Concern that requirements like separate service lines for non-alcoholic beverages may create logistical and cost burdens for organisers.
- **Discretionary Conditions & Case-by-Case Approach**
 - There are already adequate discretionary conditions.
 - Submitters noted that currently the DLC can impose discretionary conditions and these provisions reinforce this. They are used on a case-by-case basis based on risk and should be maintained.
- **Stakeholder Engagement & Regional Impact**
 - Submitters urged the council to engage with industry stakeholders to ensure a balanced approach that promotes both public safety and the success of the events sector.
 - It is essential that any policy changes do not undermine the ability of Hawke's Bay to host vibrant, economically beneficial events.
- **General discretionary conditions**
 - Guidance and Discretionary Conditions**
 - Submitters welcomed guidance but emphasized it must be legally sound and grounded in reasonableness.

- A menu of discretionary conditions together with guidelines for their use, should also be available to licensing authorities as part of the Local Alcohol Policy.

Retail Practices and Pricing

- Support for minimum pricing on single-serve alcohol (e.g., no single serves sold for less than \$6, adjusted for inflation at policy renewal), particularly in high-deprivation areas, communities with large youth populations, and Māori and Pacific communities.
- Support for banning end-of-aisle alcohol displays in supermarkets and grocery stores, citing evidence that such placements increase sales by 23–43% and significantly influence consumption.
 - Supermarkets opposed the end of aisle provision, along with other retail-focused conditions like single-sale restrictions and incident register requirements at the application stage, viewing them as overly prescriptive and in some cases ultra vires (beyond legal authority) -Specifically - incident registers, impact assessments, managers logs.

Venue Operation and Service Rules

- Opposition to restrictions on outdoor areas after certain hours, with submitters highlighting their value in creating vibrant, attractive venues.
- Concerns raised over blanket bans on serving in glass containers at specific times. Submitters cited increased costs and sustainability concerns.
- The proposed requirement of 25 working days for processing applications was viewed as overly rigid and potentially limiting flexibility for organisers and venues.

➤ **Additional discretionary conditions noted by submitters**

Sales, Delivery & Age Verification

- Council should include a requirement for mandatory age checks on purchase and delivery, particularly with the increasing availability of remote sales/delivery, citing research conducted by Alcohol Healthwatch in Auckland. This research showed in 73% of alcohol orders, the deliverer did not request age verification on delivery, 49% of alcohol orders were left unattended (contactless) at the door, and 87.5% of delivery companies broke their own restricted items policy.
- Council should include Two-hour delay before delivery to improve safety - stronger oversight of remote sellers and on-demand alcohol delivery, could help prevent underage access and ensure responsible alcohol distribution across Hastings. Research shows that easing access to online sales leads to increased hazardous drinking and the potential for illegal sales to occur. In Australia, access to on-demand alcohol delivery increased the number of people who continue drinking at home when they normally would have stopped.

Affordability & Payment Restrictions

- Council should also include Buy now Pay later restrictions - as these schemes are considered an inappropriate method of payment as it increases its perceived affordability, which can lead to greater consumption.

Health Warnings & Youth Protection

- Council should include a requirement to have FASD (Fetal Alcohol Spectrum Disorder) warning signage within the alcohol area in supermarkets and grocery stores and at point of sale at bottle stores.
- Council should include Prohibiting special licenses for events focused on children and young people under 18 years to limit their exposure to alcohol.

Training, Supervision & Workforce Standards

- Council should include having a certified manager onsite after 9pm and all nominated responsible persons having completed Serve Wise training – this shows strong evidence of a reduction in alcohol-related harm related to effective workforce training.

Advertising & Marketing Restrictions

- Council should include increased restrictions on alcohol advertising. Prohibiting or greatly limiting (<25% of the façade) the display of alcohol-related marketing or signage (sandwich boards, bollards, sleeves etc.) on public footpaths outside or within the immediate vicinity of licensed premises. In addition, covering branding, colours, lifestyle imagery, and signage to better protect community spaces. There is a causal relationship between youth alcohol initiation and heavy drinking and exposure to alcohol marketing.

Single Sales Conditions

- Submitters proposed various clearer wording for single sales conditions based on container size, alcohol content, and price.

3.13 LAP overall comments made by submitters

3.13.1 Additional comments regarding the LAP generally included the following:

Regional Consistency and Fairness

- The need for consistency between Napier and Hastings LAPs, particularly for hours and for fairness of trade.
- The need for consistency between Napier and Hastings to reduce likelihood of migration of patrons from one area to another causing additional harm.
- Having consistent policies across both councils is particularly important for businesses and event organisers who operate across both Hastings and Napier, as it will simplify compliance and reduce administrative burdens or confusion.
- Differing rules between the two areas may cause confusion to visitors and residents.

Alcohol Culture and Social Impact

- It is not the sellers causing the problems; it is the culture of our society.
- In Europe, the service stations and McDonald's outlets all serve alcohol during their opening hours.
- Good people (region-wide) are making dumb decisions because they are drinking alcohol over too many hours.
- Issues of mental health created by excessive drinking and depression caused by poor decision-making.

Influence of Availability and Drinking Behaviour

- The LAP is an effective tool for changing alcohol availability. Alongside advertising and affordability, availability is one of the keyways to influence alcohol-related harm in our communities. I encourage the Council to adopt the draft LAP.
- People will still go to drinking establishments because this is the nature of young people who want to meet friends and partners. They will probably end up spending more money in these same places as they will spend less on drinking at private residences.
- Drinking behaviours will shift — people will go out earlier, drink for fewer hours, and make better decisions after a proper night's sleep.

Regional Identity and Reputation

- Please work to protect Hawke's Bay's brand positioning.

4.0 Stakeholder feedback analysis

- 4.1 An email was sent with a copy of submission pack with the submission details to 127 stakeholders and interested parties.
- 4.2 The types of groups included in this distribution list were public health organisations (national and regional), business associations, youth services, hospitality groups, Ministries, public health alcohol organisations, Māori stakeholders including mana whenua, not for profit organisations and interest groups.
- 4.3 A meeting was held for stakeholders and interested parties on the 31st of March 2025, 15 people attended the meeting in person, with 16 attending online. This was a joint meeting with Napier City Council as many of the stakeholders would be the same for both areas.
- 4.4 A presentation was made detailing the evidence and proposed changes to the LAP.
- 4.5 Two follow up emails providing an email link to the submission form was sent again after the meeting.
- 4.6 There were 10 stakeholder submissions for Hastings of the 62 submissions received, 4 representing tourism, restaurant or hospitality associations and 4 public health / NZ Police, the HDC inspectors and youth council.
- 4.7 The below details a summary of the key themes from the statutory stakeholders' (NZ Police, Medical Officer of Health and Inspectors.)

4.8 Statutory Stakeholder feedback

4.9 Inspectors

Hours

- 4.9.1 Inspectors were generally supportive of the proposed Local Alcohol Policy (LAP). Comments included a view that the proposed closing hours for restaurants and cafes could be reduced further from 1am to 12am midnight, as it is unlikely patrons would be dining that late. It was noted that for special occasions, such as weddings, a special licence would be more appropriate.
- 4.9.2 The principles of availability theory were noted, with inspectors stating that extended trading hours increase the potential for alcohol-related harm.
- 4.9.3 Inspectors highlighted that while the LAP provides guidance on special licence closing times, there remains flexibility for the District Licensing Committee (DLC) to exercise discretion where appropriate.

Discretionary Conditions

- 4.9.4 Inspectors noted that the DLC already has the authority to impose such conditions, and the LAP simply reinforces their use on a case-by-case basis.

Location / Density

- 4.9.5 Finally, inspectors supported the location-based provisions in the LAP, stating that they offer clarity for applicants and help prevent the over-concentration of bottle stores in vulnerable communities.

4.10 NZ Police

- 4.10.1 NZ Police referred to their earlier submission to council as requested by council under section 78 (4) of the Sale and Supply of Alcohol Act 2012.

Hours

- 4.10.2 Police strongly support a general reduction in trading hours, recommending 8am to 2am for on-licence premises, with a one-way door policy beginning at 1am. For off licenses, they advocate for trading hours of 9am to 9pm for all off licence types.
- 4.10.3 NZ Police cited strong national and international evidence showing that extended trading hours increase alcohol-related harm. They emphasised that both on- and off-licence premises contribute

to this harm, noting that off licenses enable pre-loading and side-loading, which are associated with increased community harm.

4.10.4 They highlighted that rates of violence in and around entertainment precincts are clearly impacted by late-night trading hours.

Discretionary conditions

4.10.5 Police also recommended that a menu of discretionary conditions, along with clear guidance for their use, should be made available to licensing authorities through the LAP.

4.10.6 A key discretionary condition identified by Police was a minimum pricing provision for off licenses: “no single serve sales to be sold for less than \$6 (amount to be revised for inflation at renewal).” This condition was particularly recommended for premises in high deprivation areas, and in communities with high proportions of young people (under 25) and Māori and Pacific populations.

4.10.7 Police also provided a suite of discretionary conditions that will help reduce harm including:

- Presence of working CCTV including the holding of recordings for at least 28 days
- Prescribed ratio of security staff to patrons
- Size and quantity of alcohol containing drinks after midnight e.g. shots, doubles, single serve sales only.
- No glass containers after midnight
- High visibility clothing to be worn by security staff and be visible to others.
- Certified manager to be on duty at specific times (club and BYO licenses)
- Compliance with approved Host Responsibility Policy (on licenses) or Social Responsibility Policy (off licenses)
- No external alcohol related advertising (including branding) other than the trading name of the premises.
- Ensure at least 50% of store front glazing is clear.
- Exterior lighting
- Specific definition of large events requiring the provision of Alcohol Management Plans
- Provisions to manage outside areas and/or queues.
- Keeping an incident log, ensuring it is kept up to date and providing it to the reporting agencies on request.
- Mandatory reporting of violent incidents to Police
- Provision of transport (areas lacking in public transport options)
- Cessation of entertainment at a specified time
- Noise control management plans
- Food requirements (special licenses)
- No more than 2 standard drinks per serve (events)
- Display of particular products e.g. RTDs and high strength products
- Display of promotions and discounts

4.10.8 NZ Police Intelligence unit provided data as a part of the LAP process which was the basis for a large part of the LAP research paper and issues and options paper prior to the SCP.

4.11 Medical Officer of Health

4.11.1 Health NZ’s Medical Officer of Health (MOoH) supports the proposed LAP for its clarity, consistency, and equity-led focus on reducing alcohol-related harm among vulnerable communities.

Alcohol related harm

4.11.2 A 2016 Hawke’s Bay survey showed 66% of Hastings residents believed alcohol had a negative or very negative impact on their community.²⁹

4.11.3 51% of residents supported reduced bar hours, and 54% supported shorter supermarket alcohol sales hours.²⁹

- 4.11.4 MOoH stressed that there is no safe level of alcohol consumption, every drink increases risk of harm, stating alcohol poses not only acute but also long-term harms. ⁷²
- 4.11.5 One in four people engaged in heavy episodic drinking monthly, both locally and nationally. ⁴⁵
- 4.11.6 Although national heavy drinking has slightly declined to 23%, alcohol remains a major contributor to health issues including cancer, liver disease, mental health challenges, and suicide. ⁴⁴
- 4.11.7 Alcohol-related harm costs New Zealand \$9.1 billion annually. ⁵⁸
- 4.11.8 72% of this harm is caused by people without alcohol dependence, highlighting the need for broad, population-wide strategies. ⁵⁸
- 4.11.9 Supermarkets ranked second (51%) after bottle stores (65%) as the outlets most associated with harm, with multiple answers allowed. ²⁹
- 4.11.10 Research shows no substantive difference in harm between supermarkets and other off licenses. ⁸
- 4.11.11 Alcohol-related harm is evident across all Hastings suburbs, especially in high-deprivation (Decile 8–10) areas.
- 4.11.12 Misalignment between Hastings and Napier LAPs (e.g., trading hours) may increase harm.

On-Licence Trading Hours

- 4.11.13 MOoH supports the proposed earlier closing times for bars and pubs, citing ED and police data showing increased harm after 7pm, especially between midnight and 3am.
- 4.11.14 Evidence suggests a reduction in alcohol-related ED presentations in Hastings following the implementation of LAP in Napier and Hastings, although acknowledging a direct causal link is difficult.
- 4.11.15 MOoH supported the one-way door and noted its common use in other TLA's.

Off-Licence Trading Hours and Availability

- 4.11.16 MOoH supports reducing off-licence trading hours supported by:
- Supreme Court ruling on Auckland's LAP (2023)
 - International studies linking shorter hours with reduced harm. ^{70, 41.}
 - 80% of alcohol is purchased through off licenses, with harm highest in the evening. ^{11, 3.}
 - Support for 9am opening for all off licenses including supermarkets, stating a reduction in trading hours may help to support the one in four people who drink hazardously in Hawke's Bay. ⁴⁵
- Restricting alcohol sales to shorter hours than general supermarket trading times allows people to shop for groceries without being exposed to alcohol. People trying to reduce their alcohol consumption can shop at a time when they know they will not be tempted to purchase alcohol. Similar initiatives have been done with 'quiet hours' to support people who are neurodivergent. ⁶⁴
- Also suggesting an even earlier closing hour of 8am, based on new LAP evidence.

Discretionary Licence Conditions

- 4.11.17 MOoH supports including and expanding discretionary conditions, such as:
- Certified manager presence after 9pm and ServeWise training.
 - Restrictions on Buy Now Pay Later (BNPL) schemes.
 - Stronger advertising limits, especially protecting youth.
 - Controls on remote/on-demand alcohol delivery.
 - Prohibiting alcohol licenses for youth-focused events.
 - Requiring alcohol-free spaces at events with comparable quality.
 - Implementing serve-reduction systems to manage intoxication levels.

Outlet Location and Density

- 4.11.18 Opposes current provisions on outlet density; notes Hastings has a high concentration of alcohol outlets, especially off licenses, contributing significantly to harm.
- 4.11.19 Recommends extending current restrictions in Flaxmere and Camberley across Hastings.

4.12 Other Stakeholder feedback main themes

4.12.1 There were seven other stakeholders that submitted on the LAP, they were:

- Alcohol Healthwatch
- Community against Alcohol Harm
- Hastings Youth Council
- Hawkes Bay Tourism
- Hawkes Bay Tourism Industry Association
- Hospitality Association NZ
- Restaurant Association

4.12.2 The below provides short analysis of comments made by the stakeholders named above.

Hours

4.12.3 Mixed responses / support for reducing trading hours as a proven method to lower alcohol-related harm.

4.12.4 Later trading hours correlate with increased hazardous drinking. Earlier closing times reduce serious crime linked to intoxication.

4.12.5 Recommend later opening hours (a.m. hours) for bars/nightclubs to decrease overall trading time.

4.12.6 Special licenses can cover late events like weddings.

4.12.7 Some concerns about negative impacts of shorter hours, pushing drinking into unsafe, unregulated spaces (e.g., house parties).

4.12.8 Concerns with reduced hours and how this can harm youth employment and income in hospitality.

4.12.9 Other considerations, such as NZ's early dining culture differs from some other international norms and the need to cater to tourists.

4.12.10 Consensus for licence type specific licensing hours rather than broad rules.

4.12.11 Widespread Trend: Many councils across New Zealand are reducing trading hours in their Local Alcohol Policies (LAPs), especially for off licenses.

4.12.12 Public Health Impact: Over 80% of alcohol is bought from off licenses, often at low cost; reducing hours is expected to lower hazardous drinking behaviours such as pre-loading, side-loading, and post-loading.

4.12.13 Reduced Harm: Shorter hours are known to reduce harms like assault, injuries, and drink driving.

4.12.14 Evidence-Based Benefits: A recent study suggests stricter off-licence trading limits and outlet density could reduce alcohol consumption by 17.9% and add 450,000 health-adjusted life years to the population.¹²

Location and Density Provisions

4.12.15 Targeted Restrictions in High-Risk Areas: In communities such as Flaxmere and Camberley, where a significant portion of the population is under 25 and alcohol-related harm is already high, restricting new off-licence applications is viewed positively. Limiting bottle stores in these areas can reduce youth exposure and help foster healthier social norms around alcohol.

4.12.16 Support for additional areas: In addition to Flaxmere and Camberley, there is support for applying similar exclusion zones in Akina, Mayfair, and St Leonards—areas also facing deprivation and harm.

4.12.17 Reducing Outlet Clustering: There is support for proximity provisions to prevent new licensed premises from establishing too close to existing ones. This helps reduce outlet density and potential clustering, research shows clustering can increase alcohol-related harm.

4.12.18 Evidence-Based Approach to Sensitive Sites: Proximity restrictions near sensitive sites (e.g. schools, places of worship) should be grounded in evidence rather than assumptions. Some stakeholders agree with maintaining the current policy for on-licence proximity to such facilities.

Discretionary Conditions

4.12.19 Events & Hospitality Industry Impact

- Some opposition to several special licence discretionary conditions such as serve reduction systems (e.g., 2-to-1 serve limits), which are seen to negatively affect visitor experience, increase organiser costs, and harm Hawke's Bay's reputation for quality events.
- Emphasis that well-managed events already support responsible alcohol service without over-regulation.
- Call for tailored licensing conditions that reflect the type and category of licence, rather than blanket measures.

4.12.20 Retail & Sales Restrictions

- Support for single sales restrictions, especially for high-strength beers, with a call for clearer conditions based on container size, strength, and price.
- Strong support for supermarket and grocery store end-of-aisle display bans, citing evidence of 23–43% increased sales and potential harm.⁴⁸
- Support for Buy Now Pay Later (BNPL) restrictions due to increased perceived affordability and overconsumption.

4.12.21 Advertising, Marketing & Promotion

- Backing stronger restrictions on alcohol store external advertising, including; Branding, colours, lifestyle imagery, signage (e.g., sandwich boards, bollards).
- Banning of non-alcoholic products that promote harmful drinking behaviours (e.g., beer pong cups).
- Conditions should be aimed at protecting community spaces and reducing youth exposure.

4.12.22 Remote Sales & Delivery Oversight

- Support for mandatory age checks on alcohol delivery and stricter controls on remote sales. Referenced Alcohol Healthwatch research showing widespread non-compliance.
- Advocacy for a two-hour delay in alcohol delivery to prevent impulsive, extended drinking and support safer consumption patterns.

4.12.23 Public Health & Harm Reduction

- Support for the inclusion of A4-sized FASD (Foetal Alcohol Spectrum Disorder) warning signage at: Supermarkets (within alcohol sections) and Bottle stores (point of sale).
- Support for prohibiting special licenses for events aimed at under-18s to reduce youth alcohol exposure.
- Support for CPTED, host responsibility provisions, and impact assessments as part of licensing tools.

Other comments

4.12.24 Call for Regional Consistency: Stakeholders strongly support a consistent approach between Napier and Hastings. They argue that inconsistent LAPs create confusion for residents, businesses, and visitors.

4.12.25 Economic Impact on Tourism: Hawke's Bay's reputation as "New Zealand's Food and Wine Area" depends on the vibrancy and flexibility of the local hospitality sector.

5.0 Licensee feedback main themes

- 5.1 An email was sent with the submission pack and with the submission details to all 259 licensees and 11 regular large event holders for Hastings.
- 5.2 A meeting was held for all licensees on the 26th of March 2025, 36 people attended the meeting, from 57 that accepted the invitation.
- 5.3 A presentation was made detailing the evidence and proposed changes to the LAP.
- 5.4 Two follow up emails providing an email link to the submission form was sent again after the meeting.
- 5.5 32 submissions were received from licensees and event licence holders, this represents only 12% of the total licensees in the Hastings district.

- 5.6 There were a series of questions under the main policy provision headings in the questionnaire
5.7 The below details the analysis from the comments from licensees.

5.8 Hours

- 5.8.1 Some submitters believe alcohol should not be sold in supermarkets at all, citing the availability at bottle stores as sufficient.
- 5.8.2 Others argue supermarkets provide convenience for customers managing family or work commitments, making it practical to buy groceries and alcohol in one trip.
- 5.8.3 Strong support for flexible and tailored licensing, with decisions made based on the specific type of venue or activity (e.g., restaurants vs. nightclubs), rather than blanket restrictions.
- 5.8.4 Some submissions argue that reducing trading hours (e.g., 9pm close) would:
- Inconvenience customers.
 - Disrupt business operations.
 - Be ineffective in reducing alcohol-related harm without supporting evidence.
- 5.8.5 Supermarkets note customers often continue purchases after official closing hours and stress the need for realistic and practical provisions.
- 5.8.6 Hospitality NZ and others stress that well-managed licensed venues support safe drinking environments.
- 5.8.7 Concern that early closures may push drinking to uncontrolled environments (e.g., private parties), undermining public safety goals.
- 5.8.8 Emphasis on the need to accommodate international tourist expectations and diverse customer preferences, especially in service-heavy areas.
- 5.8.9 Comments reference the 2019 LAP and SSAA 2012 noting:
- A loss of appeal rights.
 - The ongoing need for decisions to be reasonable and proportionate.
 - Compliance with existing legal frameworks like the Sale and Supply of Alcohol Act.

5.9 Location and Density

- 5.9.1 Any restrictions on the proximity of alcohol outlets to sensitive facilities (e.g., schools, hospitals) should be based on evidence, not intuition or speculation.

5.10 Discretionary Conditions

- 5.10.1 Many comments stress that special license applications should be assessed on a case-by-case basis, considering the specific nature of each event and the management capabilities of the organisers.
- 5.10.2 Restrictions on drink types, alcohol percentages, and containers are seen as unnecessary red tape, especially when event organizers already have comprehensive Alcohol Management Plans (AMPs) in place, including harm reduction measures.
- 5.10.3 Some express concerns that imposing conditions like non-alcoholic service areas and security ratios after specific times could lead to logistical challenges and increased operational costs for event organisers.
- 5.10.4 The one-way door policy and other logistical conditions are criticized for potentially causing crowd separation, congregation outside venues, and disruption to the event's flow.
- 5.10.5 Overall, the concern is that such restrictions could create inflexibility for events, hindering the ability to host diverse and tailored experiences (e.g., Gin festivals, concerts, food and wine events).

5.11 General comments

- 5.11.1 Support for consistency across councils to avoid confusion, enhance the region's reputation, simplify compliance for businesses and event organisers, and improve administrative efficiency.
- 5.11.2 The region's food and wine industry are a key driver of tourism and economic growth, making it essential that policy changes support and enhance this sector rather than hinder it.

- 5.11.3 The hospitality sector relies on flexibility in operating hours, and any reduction could negatively affect visitor appeal, particularly as tourists come to experience the vibrant food and wine culture.
- 5.11.4 Some advocate for policy changes that consider the potential economic impact on Hawke's Bay, with a focus on public safety alongside fostering economic growth.

6.0 Community Feedback Main Themes

- 6.1 Two media releases, information on the council website, posts on Facebook, Instagram and a Q and A session was completed for the community submission process.
- 6.2 During the Q&A session 3 people came to ask questions and discuss the LAP, taking away the submission forms.
- 6.3 18 members of the public made a submission on the LAP.
- 6.4 There were a series of questions under the main policy provision headings in the questionnaire
- 6.5 The below details a summary from the comments from members of the public.

6.6 Hours:

- 6.6.1 Mixed response to reduced hours, some questioning evidence base and concerns with negatively affecting the struggling hospitality industry, which is vital for the region's vibrancy and economy.
- 6.6.2 Other submitters supported reduced hours as a practical step to reduce alcohol-related harm, with evidence suggesting that shorter trading hours could lead to lower rates of violence, accidents, hospital admissions, and crime, prioritizing community wellbeing.
- 6.6.3 Some opposition to extended supermarket hours, some submitter commenting Supermarkets should have the same trading hours as other off-licence outlets to ensure fairness and consistency in alcohol harm prevention. In addition, stating longer alcohol sales hours in supermarkets undermine efforts to reduce alcohol-related harm by increasing accessibility.
- 6.6.4 Others taking a stronger stance stating supermarkets should only be allowed to start selling alcohol at 10am, separate from their general opening time, to help manage alcohol accessibility in a responsible way.
- 6.6.5 Others noted Officers should have consider how the supermarket hours question was framed. This could be easily interpreted as the closing time for supermarkets in general, however the intent here is only in relation to alcohol sales. Supermarkets can continue to operate as they wish regarding the sale of general goods.

6.7 Location and density

- 6.7.1 There were some comments from members of the public that there should be more areas covered by the location controls.
- 6.7.2 Some suggested more controls around sensitive sites and vulnerable populations.

6.8 Discretionary Conditions

- 6.8.1 Some submitters stating there are already adequate discretionary conditions. The event's space is already very difficult to operate in, further restrictions will stifle events in the region.
- 6.8.2 Other commenting on the importance or a case-by-case basis and considering patron experience.
- 6.8.3 Some submitters stating there should be more measures to support those who chose not to drink at all.

6.9 General comments

- 6.9.1 The LAP is an effective tool for changing alcohol availability. Alongside advertising and affordability, availability is one of the keyways to influence alcohol-related harm in our communities. I encourage the Council to adopt the draft LAP.
- 6.9.2 Some submitters advocating for a tough line on alcohol because it causes so much harm in our communities.

6.9.3 Some submitters stating the current framework does not look after young people, long trading hours contributing to people not being constructive members of the community and alcohol generally causing harm and reduced productivity.

7.0 Other business feedback

- 7.1 The below details the analysis from the comments from general other businesses (2) that are not licensees.
- 7.2 General comments made included:
- Stress that well-managed licensed venues support safe drinking environments.
 - Outdoor dining areas are a drawcard for venues who have them, and contribute to vibrancy.
 - Issues with some discretionary conditions if they were mandatory or applied too often.
 - Comments regarding difference in NZ versus other cultures and it's not the sellers causing the issues, it is the NZ drinking culture.

8.0 Submission Analysis by Submission category

- 8.1 As a part of the analysis, submissions were broken down into 4 categories.
- Other Business (business not licensee)
 - Individual (members of the public)
 - Licensee (those holding an alcohol licence)
 - Stakeholder (Health, Police, NGO, Hospitality / tourism and food industry representatives)
 - The below details analysis of the submissions by submission category to further understand different groups positions by each question within the LAP submission questionnaire.

8.2 Hours Provisions – On licenses

- 8.2.1 **Q1: Do you agree or disagree with the following proposed changes: 1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?**

Submission Category	Yes	No	Not Answered
Business	0	2	0
Individual	6	11	0
Licensee	16	4	11
Stakeholder	5	2	3

8.2.2 Out of the total submissions, there was support generally among Licensees and Stakeholders, while the other 2 businesses were opposed. Individuals mostly disagreed with the proposed change, however 4 of those individuals that stated no, proposed earlier closing hours.

8.2.3 Therefore, in essence more individuals agreed with a general reduction in licensing hours for nightclubs, bars, taverns and pubs.

Support generally for the reduction in hours for nightclubs, bars, taverns and pubs

8.2.4 Q2: Preferred Closing Time by Submission Category

Submission Category	11pm	12am	1am	2am	3am	4am	No Answer	Total
Business	0	0	0	0	2	0	0	2
Individual	1	0	3	5	5	3	1	18
Licensee	0	1	1	15	3	0	11	31
Stakeholder	0	0	0	5	1	0	4	10

8.2.5 A larger proportion of Licensees and Stakeholders prefer a 2am closing time, while Individuals are split across 2am–3am preferences. The 2 Other Businesses unanimously prefer 3am. A significant portion of Licensees and Stakeholders provided no answer.

There is support for a 2am closing from all submission categories, including from licensees, however noting a large proportion of licensees did not answer this specific question.

8.3 Q3: One-Way Door Agreement

Submission Category	No	Yes	No Answer	Total
Business	1	0	1	2
Individual	3	13	2	18
Licensee	4	15	12	31
Stakeholder	0	6	4	10

A large proportion from all categories agreed with the one-way door policy

8.4 Q4: Cafe/Restaurant Hours Agreement

Submission Category	No	Yes	No Answer	Total
Business	1	1	0	2
Individual	9	8	1	18
Licensee	6	14	11	31
Stakeholder	3	4	3	10

8.4.1 Businesses, Stakeholders and Individuals showed a near even split, Licensees supported the reduced hours for Café/ restaurants etc., noting a large proportion did not answer that question.

8.4.2 Noting 3 of the 9 individuals that stated no, wanted further reduced hours, meaning a total of 11 wanted reduced trading hours for cafes and restaurants.

Generally, a reduction in the closing hours for cafes, restaurants, wineries and winery restaurants was supported from all categories.

8.5 Q5: Preferred Closing Time for Cafes/Restaurants

Submission Category	11pm	12am	1am	2am	3am	4am	No Answer	Total
Business	0	1	0	0	0	0	1	1
Individual	2	2	7	3	2	1	1	18
Licensee	0	2	13	5	0	0	11	31
Stakeholder	0	1	4	0	0	0	5	10

The preferred closing time for cafes/ restaurants etc. was 1am for all categories, including licensees, however noting a large proportion of licensees did not answer this question.

8.6 Q6: Entertainment Venue Hours Agreement

Submission Category	No	Yes	No Answer	Total
Business	2	0	0	1
Individual	7	9	2	18
Licensee	4	15	12	31
Stakeholder	2	5	3	10

8.6.1 Licensees and Stakeholders mostly support the proposed entertainment venue hours, while Individuals are evenly split. Many Licensees did not answer.

8.6.2 Noting 2 of the 7 individuals who stated no, requested further reduced hours. Therefore, in essence, 11 individuals wanted reduced hours.

Most supported reduced trading hours for Entertainment venues and other on licenses.

8.7 Q7: Preferred Closing Time for Entertainment Venues

Submission Category	11pm	12am	1am	2am	3am	4am	No Answer	Total
Business	0	0	0	1	0	0	1	1
Individual	1	0	9	2	3	2	1	18
Licensee	0	1	14	4	1	0	11	31
Stakeholder	0	0	5	0	0	0	5	10

Most categories, including Licensees agreed with a 1am closing, noting the large proportion of licensees did not answer this question.

8.8 Hours provisions: Off Licences

8.9 Q1: Do you agree with the following proposed changes: A reduction in hours for off licenses generally

Submission Category	Yes	No	Not Answered	Total
Business		1	1	2
Individual	12	4	2	18
Licensee	13	9	9	31
Stakeholder	6	0	4	

Most individuals, Licensees and stakeholders agreed with the reduction in hours generally for off licenses.

8.10 Q2: Which is the most appropriate opening time for supermarkets?

Submission Category	7am	8am	9am	10am	No Answer
Business	0	1	0	0	1
Individual	6	0	7	3	2
Licensee	8	4	6	5	8
Stakeholder	0	0	5	1	4

8.10.1 Licensees and Individuals are split across 7am to 10am, with 7am and 9am being the most preferred. Stakeholders prefer 9am, and Businesses gave limited responses, with one selecting 8am and one not answering.

Individuals and stakeholders generally wanted a later opening hour for supermarkets (9am or 10am). Licensees are very split between earlier or later morning opening hours.

8.11 Q3: Most appropriate opening time for bottle stores and cellar doors etc.

Submission Category	7am	8am	9am	10am	No Answer
Business	0	1	0	0	1
Individual	2	0	8	5	3
Licensee	1	2	11	7	10
Stakeholder	0	0	5	1	4

8.11.1 The most preferred opening time overall is 9am, especially among Licensees and Stakeholders. Individuals also favour 9am, while Business responses were minimal, with one selecting 8am and one not responding.

General support for later morning opening hours for all other off licences, including licensees.

8.13 Q4: Should supermarkets have the same hours as all other off licences?

Submission Category	Yes	No	No Answer
Business	1	0	1
Individual	9	6	3
Licensee	13	8	10
Stakeholder	6	0	4

A larger proportion of each submission category agreed that supermarkets should have the same hours as all other off licences.

8.14 Q6: Most appropriate closing time for supermarkets

Submission Category	8pm	9pm	10pm	11pm	No Answer
Business	0	0	1	0	1
Individual	4	5	6	1	2
Licensee	1	10	9	3	8
Stakeholder	1	4	1	0	4

Individuals and Stakeholders favour an earlier closing time of either 8pm or 9pm, Licensee are relatively split, slightly more preferring 10pm or 11pm closing time.

8.15 Q7: Most appropriate closing time for all other off licences?

Submission Category	8pm	9pm	10pm	11pm	No Answer
Business	0	0	1	0	1
Individual	3	7	3	3	2
Licensee	0	8	11	2	10
Stakeholder	1	4	1	0	4

The preferred closing time for off licences is 10pm for Licensees with stakeholders and individuals preferring 9pm and earlier.

8.16 Hours Provisions – Club Licences

8.17 Do you agree with the proposed changes: A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

Submission Category	Yes	No	No Answer
Business	0	1	1
Individual	9	6	3
Licensee	12	6	13

Submission Category	Yes	No	No Answer
Stakeholder	4	0	6

8.17.1 Most Individuals, Licensees, and Stakeholders support the reduction, with a large proportion of licensees not answering this question.

8.17.2 One business premises stated no, then still stated 12am midnight as the preferred closing time and one individual stated no and wanted further reduced hours to 9pm.

There is general support for the reduction of closing hours for small club licenses.

2. If no, which option is the most appropriate closing time?

Submission Category	9pm	10pm	11pm	12am	1am	2am	3am	No Answer	Total
Business				1				1	2
Individual	1			9	2	3		3	18
Licensee		1		11	4	1		14	31
Stakeholder				4				6	10

The most preferred closing time for small club licenses was 12am midnight for all categories of submissions.

8.18 Hours Provisions – Special licenses

8.19 1. Do you think there should be opening and closing times set in the LAP for special licenses (event licenses)?

Submission Category	Yes	No	No Answer
Business		1	1
Individual	7	8	3
Licensee	12	8	11
Stakeholder	3		7

8.19.1 Licensees and Stakeholders are supportive of hours for special licenses, noting a large portion of Licensees and Stakeholders did not respond. Individuals and businesses did not approve.

Licensees and Stakeholders show some support for setting opening and closing times for special licences, while Individuals and Businesses submitted slightly more responses opposing the idea.

8.20 Discretionary Conditions

8.21 1. Do you agree with the discretionary conditions generally?

Submission Category	Yes	No	No Answer
Business	1	1	
Individual	8	6	4
Licensee	18	10	3
Stakeholder	5	1	4

Most Licensees, Individuals, and Stakeholders agree with the discretionary conditions, while Businesses are split. A small number of submissions did not provide an answer.

8.22 Location and Density

8.23 1. Do you agree with the location and density conditions generally?

Submission Category	Yes	No	No Answer	Mixed answer
Business		1	1	
Individual	10	3	5	
Licensee	18	1	12	
Stakeholder	4	1	4	1

Most submitters from each category agreed with the location and density provisions, a large number of licensees did not answer this question.

9.0 Hearings analysis

9.1 There was a total of 8 submitters that wanted to be heard, they were:

- Health NZ
- NZ Police
- Alcohol Healthwatch
- Hospitality Association NZ
- Liquid Events
- Community Against Alcohol Harm
- Foodstuffs North Island
- Woolworths NZ

9.2 Below details a high-level summary of the key points raised, the full recording of the hearings can be found on the council website under Alcohol Licensing.

<https://www.hastingsdc.govt.nz/services/alcohol-licensing/>

9.3 NZ Police

- Sergeant Ray Wylie and Constable David Power (representing Inspector Andy Sloan)

General Position:

9.3.1 Ray Wylie spoke as a specialist in alcohol harm prevention and on behalf of a submission authored by Inspector Sloan.

9.3.2 Strongly supported Hastings District Council's proposed Local Alcohol Policy (LAP), particularly around reducing trading hours and introducing discretionary conditions.

Key Policy Recommendations: Trading Hours:

- On-licence premises: Support for 8:00 AM to 2:00 AM trading hours.
- Off-licence premises: Support for 9:00 AM to 9:00 PM.
- Supported a one-way door policy starting 1 hour before closing time, i.e., from 1:00 AM for on-licenses, to reduce late-night movement between venues.

Rationale for Hours Reduction:

9.3.3 Cited domestic and international evidence showing strong correlation between later trading hours and increased alcohol-related harm.

9.3.4 Repeated the saying, "nothing good happens after midnight," emphasizing that late-night hours often see the worst behaviour.

9.3.5 Emphasized that earlier closing times directly lead to fewer assaults, disturbances, and police callouts, particularly between 2:00 AM–3:00 AM.

Impact of Reduced Trading Hours:

9.3.6 Police Observations:

9.3.7 Ray and his colleague David have worked both late and early shifts, observing clear increases in alcohol-related harm post-2:00 AM.

- 9.3.8 Mentioned deterioration of decision-making and increased aggression in the early morning hours due to fatigue and intoxication.
- 9.3.9 The most serious incidents often occur after 2:00 AM, coinciding with patrons being more intoxicated.

Staffing Consideration:

- 9.3.10 Police have two units until 2:00 AM; one unit drops off afterward, leaving reduced capacity to respond to issues during the most volatile time. Noting however this is not the reason for their policy position. There is clear evidence of harm associated with those later trading hours.

Off-Licence Harms & Pre-Loading:

- 9.3.11 Highlighted risks from pre-loading (drinking before going out) and side-loading (drinking during a break from bars or in cars).
- 9.3.12 Noted off-licence premises contribute to unregulated and unsupervised drinking, which spills into public harm later in the evening.
- 9.3.13 Supported limiting off licence hours to curb this early access and reduce harm.

Single sales – discretionary conditions:

- 9.3.14 Police recommended a national discretionary condition: no single alcohol product should be sold for less than \$6. Reasoning:
- Prevent the sale of cheap, high-strength single serves (e.g., strong beers or shots split from bulk packs).
 - Especially critical in high-deprivation areas, where cheap alcohol is more accessible and causes disproportionate harm.
 - Mentioned seeing alcohol sold as low as \$2 per shot after being split from larger packs.
 - Price would influence alcohol-dependent individuals from dangerously cheap options, particularly in Māori and Pacific communities and areas with a high population under 25.

Data and Evidence:

- 9.3.15 Police noted national data from headquarters but noted Ray is not an analyst and couldn't interpret statistics.
- 9.3.16 He emphasized the importance of gathering more local data over time to assess LAP effectiveness.

Alignment with Napier LAP:

- 9.3.17 When asked about differences between Hastings and Napier's approaches, Ray stated there were none currently, as Napier had adopted Hastings' LAP previously.
- 9.3.18 Supported consistency across districts to avoid potential "drunk migration" — patrons driving from one area with earlier closures to one with later ones (e.g., from Hastings to Napier).
- 9.3.19 However, noted that people tend to have their preferred premises and was unsure if migration at closing time would or would not be an issue.

Concerns About Private Parties:

- 9.3.20 Acknowledged concerns about patrons leaving early and continuing to party at home.
- 9.3.21 However, argued this risk has lessened in recent years, with fewer large parties being observed.
- 9.3.22 Believed an earlier closing time would actually shorten private parties as people would still want to go out to premises for the socializing aspect, thus reducing unsupervised drinking hours.

Additional Points:

- 9.3.23 Suggested a "menu" of discretionary conditions should be made available for licensing authorities to apply based on local need.
- 9.3.24 Emphasized the need to control:
- Outlet location
 - Outlet density

9.4 Health New Zealand

- Dr Alex Hedley and Dr Nick Jones

Overall Position:

- 9.4.1 Supportive of the Hastings draft Local Alcohol Policy (LAP).
- 9.4.2 Emphasized that alcohol causes the most harm of any drug in New Zealand.
- 9.4.3 Framed their submission in line with their statutory obligations under the Healthy Futures Act and the Health Act — to improve, promote, and protect health.
- 9.4.4 Recommended stronger measures than those currently proposed in the draft LAP.

Trading Hours Recommendations:

- On-Licence Premises (e.g., bars):
 - Support proposed 2:00 AM closing time / 1am closing time
 - Support one-way door policy.
- Off-Licence Premises (e.g., supermarkets, bottle stores):
 - Stronger stance than current draft — recommend closing at 8:00 PM (not 9:00 PM).
 - Opening time should remain at 9:00 AM, rejecting requests from some supermarkets to open earlier (e.g., 7:00 AM).
 - This later opening hour may help the 1 in 4 people with alcohol dependence or hazardous drinking, akin to quiet shopping hours for those that are neurodivergent.

Health Harm & Evidence:

- 9.4.5 Asserted that no level of alcohol consumption is safe — global health consensus supports this.
- 9.4.6 Alcohol is linked to:
 - Cancers, liver disease, Foetal Alcohol Spectrum Disorder (FASD)
 - Mental health disorders
 - Suicide – alcohol linked to 1 in 4 suicides
- 9.4.7 Māori are twice as likely to die from alcohol-related causes as non-Māori.
- 9.4.8 Men make up 83% of alcohol-attributable deaths.
- 9.4.9 People in high deprivation areas are significantly more likely to drink hazardously.
- 9.4.10 “72% of the economic cost of alcohol falls on people without an alcohol use disorder.”

Policy Impacts & Research Cited:

- 9.4.11 Cited international and local research showing:
 - Earlier closing hours reduce assaults and emergency department visits.
 - Noted drops in alcohol-related ED visits after the current joint LAP was introduced (although difficult to determine direct causal link)
- 9.4.12 Stated that trading hour reductions and outlet density controls are among the most effective harm minimization strategies, along with pricing and marketing restrictions.
- 9.4.13 Noted there is no evidence to suggest that there is less or more harm from one type of off licence, they all contribute to alcohol related harm.
- 9.4.14 Must consider both longer term harms and acute harms.

National and International Best Practice:

- 9.4.15 Pointed to global consensus on the “Three A’s” of effective alcohol control:
 - Affordability
 - Availability
 - Advertising
- 9.4.16 Said LAP’s are critical for controlling availability, while national laws tackle the other two.

Recommendations for Strengthening the LAP: Location & Density Restrictions:

- 9.4.17 Hastings has 259 alcohol licenses (1 per 331 residents), 30% higher than the national average.
- 9.4.18 Supported extending existing restrictions in Flaxmere and Camberley to the entire district (especially high deprivation zones).

9.4.19 Proposed a sinking lid policy for off licenses (i.e., no new licenses granted over time as existing ones lapse).

Equity Focus:

9.4.20 Called for LAP to specifically address harm in Māori, Pacific peoples, under-25s, and deprived areas.

9.4.21 Consistency across Hawke's Bay: Supported consistency between LAP's to prevent harm from "bar hopping" between jurisdictions.

Additional Discretionary Conditions Suggested:

- Buy-Now-Pay-Later (BNPL): Ban BNPL options for alcohol, which disproportionately harm low-income consumers.
- Age Verification for Delivery: Mandatory ID checks for online alcohol sales and deliveries — prevent underage access.
- FASD Warning Signage: Require Foetal Alcohol Spectrum Disorder warning signage in all off-licence premises.
- Single Sales Restrictions: Limit single can/bottle alcohol sales (especially high-strength products).
- Licensing Conditions: Add tailored conditions to manage crowd behavior, like limiting number of drinks per purchase during late hours (but allow flexibility for event managers).

Data & Monitoring:

9.4.22 Noted that more localized data is needed, especially around:

- What types of alcohol people consume before ED admissions
- Whether they're coming from licensed or private settings

9.4.23 Working on a project to assess local alcohol-attributed ED presentations to cover the above concerns.

Responses to Discussions:

9.4.24 Preloading risk: Acknowledged that earlier bar closures might shift some drinking to private homes but argued that this would still shorten total drinking time and reduce harm.

9.4.25 Economic vs Health Trade-off: Argued that New Zealand's alcohol excise tax is \$4 billion short of covering alcohol's social costs.

9.4.26 Emphasized LAPs empower communities to balance public health with business needs through evidence-based policy.

9.5 Alcohol Healthwatch

- Andrew Galloway

Organisational Overview:

9.5.1 Alcohol Healthwatch is a national non-profit organisation focused on reducing alcohol-related harm through evidence-based policy and advocacy.

9.5.2 Funded primarily by Health New Zealand, with some additional donations.

9.5.3 Works with communities, councils, and central government to advise on alcohol policy and planning.

9.5.4 Coordinates the Cross-Council LAP Network, supporting collaborative efforts to reduce harm.

General Position on the Hastings LAP:

9.5.5 Strongly supports Hastings District Council's efforts to update its 2019 LAP.

9.5.6 Applauded the Council for:

- Reducing on and off-licence trading hours
- Restricting new bottle stores in Flaxmere and Camberley
- Proposing discretionary conditions

9.5.7 "Alcohol is the most harmful drug in Aotearoa. A revised LAP must reflect current issues and support consistency across the Bay and NZ."

Policy Recommendations and Rationales: Trading Hours

9.5.8 On-Licences: Supports the 2:00 AM closing time and recommends considering a later opening time (not earlier), to reduce overall exposure and availability.

9.5.9 Off licenses: Supports 9:00 AM – 9:00 PM but recommends reducing closing time to 8:00 PM.

- 9.5.10 Opposes supermarket lobby requests to open alcohol sales at 7:00 AM — cites evidence that greater availability leads to more harm and any level of consumption is now known as unsafe and harmful.
- 9.5.11 Stated the precautionary approach is appropriate.
- 9.5.12 Commented on the need to not only assess crime and acute harm as evidence but consider chronic harm over time. Noted the impacts of being exposed to alcohol areas in supermarkets increasing early uptake.
- 9.5.13 Supports implementation of the One-Way Door Policy as it aims to limit barhopping and control the flow of intoxicated patrons into venues during late hours.

Harm Reduction Justifications:

- 9.5.14 Alcohol harm includes:
- Injury, violence, suicide, mental illness, cancer, FASD, and economic burden.
 - Cited the \$9.1 billion estimated annual cost of alcohol harm in NZ.
 - Emphasized that harm is not only from binge drinkers, but also moderate users contributing to a large volume of harm collectively.
 - Alcohol harm is concentrated in:
 - High deprivation areas
 - Younger people
 - Māori and Pacific communities

Evidence on Availability & Harm:

- 9.5.15 Highlighted studies showing that reduced trading hours equated to lower emergency department visits, assaults, and antisocial behaviour.
- 9.5.16 Stressed availability equates to more harm, and more outlets equates to more consumption and more harm.
- 9.5.17 Referenced Auckland and Rotorua's use of "freezes" on new licenses in priority areas.

Location & Density Controls:

- 9.5.18 Expansion of current off-licence restrictions to include other high-deprivation areas (e.g., Akina, Mayfair, St Leonards).
- 9.5.19 Stronger policies under s77 of the Sale and Supply of Alcohol Act to address:
- Location (e.g., zones only)
 - Density
 - Proximity to sensitive sites (schools, marae, treatment centres, health facilities)

Discretionary Conditions:

- 9.5.20 "The ability to tailor licensing conditions must be protected — these are optional tools, not mandatory rules."
- 9.5.21 Fully supported Council's proposal to include conditions like:
- Single sale limits
 - External signage and advertising restrictions
 - Management of events using Crime Prevention Through Environmental Design (CPTED) principles

Additional Conditions Recommended:

- Ban Buy-Now-Pay-Later (BNPL) services: Predatory for vulnerable consumers.
 - Mandatory ID verification for online delivery: To prevent minors from receiving alcohol.
 - FASD signage: At off licenses to educate about foetal alcohol risks.
 - No special licenses for family-focused events (e.g., children's festivals).
 - Mandatory age checks and intoxication checks at delivery.
- 9.5.22 Remote Alcohol Delivery: Cited their 2023 Auckland study showing 73% of deliveries occurred with no ID check and delivery times as fast as 15–30 minutes, fueling impulsive consumption.
- 9.5.23 Compared to Australia's stronger controls — e.g., mandatory ID scanning, delivery refusal to intoxicated persons.
- 9.5.24 Advocated for district-level regulation now, while waiting for potential national legislative changes.

9.5.25 Single Sales:

- Supported Police proposal for a \$6 minimum price on single-serve alcohol.
- Based on previous work in Auckland CBD, where imposing single-sale limits:
 - Reduced drinking among unhoused people
 - Limited street consumption
 - Argued pricing strategies target price-sensitive, high-risk groups, which is effective.

Community Empowerment & Council Role:

9.5.26 Encouraged Council to take a precautionary approach.

9.5.27 Emphasized that LAPs empower local communities to take action in line with their values and harm experiences.

9.5.28 Noted that licenses can still be granted even if a policy states otherwise, unless there's community opposition — hence a strong LAP is essential.

9.6 **Hospitality New Zealand Submission**

- Shane Phillips

Overall Position:

9.6.1 Hospitality NZ opposes several proposed LAP changes, particularly:

- Earlier closing times for on-licence premises
- One-way door policies

9.6.2 Argues that hospitality is part of the solution, not the problem, and that well-managed venues reduce alcohol-related harm.

Opposition to 2:00 AM Closing Time

9.6.3 Many late-night venues rely on 2:00–3:00 AM trading for significant income.

9.6.4 Cutting back hours could:

- Reduce revenue
- Force venue closures
- Lead to job losses in hospitality and tourism

9.6.5 Warned of a “vacuum effect” where patrons may move to less regulated environments (e.g., private parties or other cities).

Events and Tourism Impact

9.6.6 Hawke's Bay is branded as the Food and Wine Capital of New Zealand.

9.6.7 Shorter hours and stricter conditions may:

- Undermine the region's event-hosting capabilities
- Discourage promoters and tourism-related business

9.6.8 Urged the Council to protect the economic vitality of events and nightlife.

Support for Well-Run Premises

9.6.9 Emphasized that most on-licence venues are responsibly run.

9.6.10 Cited growing participation in host responsibility training offered by Hospitality NZ - Notably, a tripling in training attendance, including collaboration with tri-agencies (e.g., Inspectors, Police, Health).

Opposition to One-Way Door Policy

9.6.11 Claimed these policies:

- Disrupt customer experience
- Lead to group separation (e.g., someone steps out and can't re-enter)
- Create crowd congestion outside venues

9.6.12 Suggested these outcomes could increase, not decrease harm.

Concerns Over Regional Inconsistency

9.6.13 Urged regional alignment in LAPs to avoid:

- Patrons migrating across city boundaries for longer hours.
- Strain on police resources and confusion among patrons.

Call for Enforcement, Not Blanket Restrictions

9.6.14 Advocated for better enforcement of existing rules, rather than new restrictions.

9.6.15 Encouraged greater police visibility to curb preloading and street drinking.

Additional Comments:

9.6.16 Recognized the public health concerns raised by other submitters but stressed the need for a balanced approach that considers:

- Economic health of the region
- Sustainability of hospitality businesses
- Community vibrancy and nightlife

Final Message to the Council:

9.6.17 Don't punish responsible operators. Partner with us. Focus on education, enforcement, and collaboration — not restrictive policies that risk jobs and culture.

9.7 Liquid Events

- Michael Swan

Submission Summary

9.7.1 Represented Liquid Events, a company that organizes events in Hastings and NZ wide.

9.7.2 Provided a hospitality industry perspective, particularly from the events and entertainment sector.

Opposition to Reduced Trading Hours

9.7.3 Expressed concern about the proposed 2:00 AM closing time, especially for on-licence venues and special events.

9.7.4 Argued that later closing times (e.g., 3:00 AM) are critical for:

- The viability of late-night events.
- The economic success of venues that rely on peak business between 2:00–3:00 AM.
- Maintaining a vibrant nightlife and tourism appeal in Hastings.

Economic Impact on Events Industry

- Stressed that events bring significant revenue and jobs to the region.

9.7.5 Shortening trading hours could:

- Reduce attendee satisfaction.
- Deter performers and promoters.
- Limit flexibility for running successful events.

Event-Specific Licensing Needs

9.7.6 Asked the Council to consider the unique nature of special events:

- Unlike regular bars, events are less frequent and tightly managed.
- Called for flexibility in licensing conditions (e.g., occasional exemptions or tailored hours).
- Overly restrictive discretionary conditions could hinder the industry. Industry already has good host responsibility policies – serve reduction systems/ security ratios etc. If the industry is over regulated, large sponsors and large concerts etc. may not come to Hawkes Bay.

Well-Managed Events Are Low Risk

9.7.7 Argued that Liquid Events already takes alcohol harm seriously by:

- Implementing strict host responsibility protocols.
- Working with police and health agencies to ensure safe environments.

9.7.8 Suggested that blanket restrictions penalize responsible operators.

9.7.9 If the conditions were implemented as they should be, as discretionary and when there is good reason or high risk, then there would be no objection.

Key Message:

9.7.10 Don't treat events the same as bars — they are different by nature, operate under stricter control, and provide significant economic and cultural value to the region.

Requests to the Council:

9.7.11 Consider special provisions for event licenses.

- 9.7.12 Avoid one-size-fits-all rules that could damage the events sector.
9.7.13 Ensure consultation with the events industry before finalising restrictions.

9.8 Communities Against Alcohol harm

- Nathan Cowie
- 9.8.1 Spoke on behalf of a community advocacy group focused on minimizing alcohol-related harm, particularly at the grassroots level.
9.8.2 Represented residents and families concerned about the social and health impacts of alcohol in their neighborhoods.
9.8.3 Often help during hearings and submit in opposition to licenses.

Strong Support for LAP Restrictions

- 9.8.4 Fully supported:
- Reduced trading hours for on- and off licenses
 - The one-way door policy
 - A sinking lid policy for new licenses
- 9.8.5 Called for even stricter measures where possible, based on community-level observations.
9.8.6 Noted that for off licence supermarkets later alcohol sales can be easily implemented, a cordon off single alcohol area or curtain/ pull down for grocery stores. Done often overseas in areas like Ireland.
9.8.7 For on licenses, you can still have a vibrant nighttime economy closing at 2am, places like California have a great nightlife and close earlier.

Outlet Proliferation

- 9.8.8 Strongly criticized the high density of alcohol outlets, particularly in low-income areas.
9.8.9 Supported extending outlet restrictions beyond Flaxmere and Camberley to other high-deprivation areas like Akina and Mayfair.

Equity & Justice

- 9.8.10 Highlighted that Māori, youth, and low-income families suffer the brunt of alcohol harm.
9.8.11 Stressed that Council has a duty to protect vulnerable communities, and not let business interests override public well-being.
9.8.12 Pushed back on claims that late-night bars or flexible event licensing reduce harm.
9.8.13 Argued that economic benefits cannot justify social costs, especially when the harm disproportionately affects those with the least power to influence policy.

Discretionary conditions

- 9.8.14 Single Sales Restrictions: Recommends a minimum price of \$6 and limiting containers to 2 standard drinks, to exclude high-strength, low-cost products while preserving craft beer sales. Raised concern about emerging high-strength beers (e.g., 16% ABV in 500ml cans = 6.5 standard drinks), which increases public harm.
9.8.15 Often single sales are then consumed in public places or between going to venues.
9.8.16 External Advertising: Advocates for tighter controls on alcohol signage beyond brand names: include franchise colours, lifestyle imagery, and signal words (e.g., "beer", "wine"). Rationale: Reduces children's exposure, delays drinking initiation—identified as a modifiable risk factor.
9.8.17 Pregnancy Warning Signs: Suggests point-of-sale A4 signage mirroring pregnancy product labels to address Foetal Alcohol Spectrum Disorder risks.
9.8.18 Ban on Buy Now Pay Later (BNPL) & Fast Alcohol Delivery: Recommends conditions to prohibit BNPL and enforce delivery delays (e.g., next-day delivery) to reduce impulse and risky consumption.

Final message

- 9.8.19 Supported the proposed amendments, emphasizing the need to reduce alcohol-related harm, particularly among Māori, Pasifika, and youth in deprived areas. He argued for stronger community control over licensing decisions and highlighted research showing high exposure to alcohol

marketing. Cowie urged prioritizing public health over commercial interests to better protect vulnerable populations.

9.9 Foodstuffs North Island

- Iain Thain

9.9.1 Legal representative for Foodstuffs NZ, which owns and operates supermarket brands such as New World, PAK'nSAVE, and Four Square.

9.9.2 Spoke on behalf of the company's interests as a major off-licence alcohol retailer.

Opposition to Reduced Off-Licence Hours

9.9.3 Requested earlier opening hours (e.g., 7:00 AM) to align with store opening times.

9.9.4 Argued that customer convenience and shopping patterns justify earlier alcohol sales.

9.9.5 Saw the proposed 9:00 AM–9:00 PM window as arbitrary and unnecessary, particularly when supermarkets open earlier.

9.9.6 Cited lack of evidence, particularly for the opening hours.

9.9.7 There isn't a large proportion who shop at 7am-9am, its usually as a part of the overall shop.

9.9.8 Allowing some flexibility around the 9pm closing is useful to keep staff and other customers safe.

Emphasis on Responsible Retailing

9.9.9 Asserted that Foodstuffs:

- Trains staff extensively on host responsibility.
- Has a low rate of licence breaches.
- Is committed to safe and compliant alcohol sales.

9.9.10 Stated Foodstuffs stores as safe, controlled, and well-supervised alcohol retail environments.

Opposition to Uniform Treatment Across Off-Licence Types

9.9.11 Argued against treating supermarkets the same as bottle stores.

9.9.12 Suggested that supermarkets sell alcohol as part of a grocery shop, not as a standalone purpose, and should be treated differently under the LAP.

Economic and Operational Concerns

9.9.13 Stated that restricted hours could:

- Cause customer confusion and frustration.
- Create operational inefficiencies for stores that are already open for business but barred from alcohol sales.

9.9.14 Highlighted that alcohol is a legitimate product and an important part of overall store revenue.

Request for Evidence-Based Policy

9.9.15 Questioned the strength and specificity of the evidence linking earlier trading hours to local alcohol harm.

9.9.16 Asked the Council to balance harm prevention with consumer rights and business viability.

9.9.17 Stated policy changes should be proportional to the demonstrated problem, and not unduly burden responsible businesses.

Ultra Vires:

9.9.18 In his submission Mr. Thain raised concerns that some aspects of the proposed LAP) may be ultra vires — meaning beyond the legal powers granted to the Council under the Sale and Supply of Alcohol Act 2012 (SSAA).

9.9.19 He cautioned the Council that if parts of the LAP go beyond what the SSAA allows, Council could be legally challenged and overturned.

9.9.20 Specifically raised concern over:

- Discretionary conditions definitions, guidance and wording
- Impact assessments
- Incident registers and manager logs
- End of Aisle restrictions

- Single sale restrictions

9.9.21 LAPs must strictly conform to what the Act permits — namely, policies regarding location, density, and trading hours, along with discretionary conditions that are reasonable and directly related to the harm minimization objectives.

9.9.22 Foodstuffs may be open to having discussions about FASD signage in supermarkets.

Final Message:

9.9.23 Supermarkets are not the problem. We sell alcohol responsibly as part of grocery shopping. Restrictive hours punish law-abiding businesses and inconvenience customers without solving the core issues.

9.10 *General Distributors Limited (GDL) – Woolworths*

- Poppy Mitchell-Anyon

Submission Summary

9.10.1 Spoke on behalf of GDL, the alcohol licence-holding company for Countdown supermarkets (a division of Woolworths NZ).

9.10.2 Represented the interests of a major off-licence supermarket chain operating across the country, including in Hastings.

Opposition to Reduced Off-Licence Hours

9.10.3 Argued against limiting alcohol sales to 9:00 AM–9:00 PM.

9.10.4 Requested earlier opening hours, such as 7:00 AM, to match regular store opening times.

9.10.5 Claimed that aligning alcohol hours with store hours is logical, operationally efficient, and better for customer convenience.

Supermarkets Are Responsible Sellers

9.10.6 Emphasized GDL/Countdown's:

- Comprehensive staff training
- Strict ID-checking protocols
- Strong compliance record

9.10.7 Positioned supermarkets as low-risk environments for alcohol sales, especially compared to standalone bottle stores.

Unequal Treatment of Licence Types

9.10.8 Stated that the proposed LAP shouldn't treat supermarkets the same as bottle stores

- Different customer behaviour
- Different sales environments (alcohol is not the primary product in supermarkets)

9.10.9 Argued that supermarkets are not a source of alcohol-related disorder.

Lack of Robust Evidence

9.10.10 Suggested that the policy rationale for reducing hours was weak or unsupported by specific local evidence.

9.10.11 Asked Council to ensure LAP measures are evidence-based and proportionate to actual harm.

Legal Risk & Ultra Vires Concerns

9.10.12 Echoed Foodstuffs NZ's legal concern that overreaching conditions in the LAP may be ultra vires (beyond legal authority under the Sale and Supply of Alcohol Act 2012).

9.10.13 Urged the Council to focus only on what is clearly allowed: location, density, trading hours, and reasonable discretionary conditions.

Final Message:

9.10.14 Supermarkets are responsible alcohol retailers. Ask Council not to impose unfair restrictions that do not reflect how safely we operate or the minimal risk we pose.

9.11 Overarching Themes from the LAP Hearings

9.11.1 The below summarizes the themes from the LAP hearings.

1. Balancing Public Health and Economic Interests

9.11.2 Public health advocates (e.g. Health NZ, Alcohol Healthwatch, Police, Community Against Alcohol Harm) strongly supported:

- Reducing trading hours
- Limiting outlet density
- Introducing stricter conditions on alcohol sales

9.11.3 In contrast, the hospitality and retail sectors (e.g. Hospitality NZ, Foodstuffs, GDL, event operators) emphasized:

- Economic impacts, employment, and tourism
- The need to avoid overregulation of responsible operators

9.11.4 Tension between minimizing harm and maintaining a thriving economy was a core thread throughout the hearing.

2. Trading Hour Reductions

9.11.5 Multiple stakeholders (Police, Health NZ, Alcohol Healthwatch, CAAH) supported:

- A reduction in on licenses generally
- 2:00 AM closing time for bars (with a 1:00 AM one-way door)

9.11.6 Support for reduced opening hours for off licenses

9.11.7 Strong support for earlier closing for off-licence premises

9.11.8 Opposition came from:

- Hospitality industry, which relies on post-2:00 AM trade
- Supermarkets, who sought earlier opening hours (7:00 AM)

9.11.9 Supporters of reduced hours cited clear international and local evidence linking later sales or increased sales time, with increased harm.

9.11.10 Consensus by most noting a safer environment in an on licence than in an unregulated environment.

3. Outlet Density and Location Restrictions

9.11.11 Public health voices urged the Council to:

- Expand restrictions on new outlets (in addition to high-deprivation areas like Flaxmere and Camberley)
- Introduce a "sinking lid" or cap type policy
- Avoid clustering near schools, health services, and marae

9.11.12 This theme linked strongly to concerns about equity, particularly the disproportionate impact of alcohol harm on Māori and low-income communities.

4. One-Way Door Policy – Divided Views

9.11.13 Police and health sector supported it to:

- Reduce violence
- Limit late-night movement between venues

9.11.14 Hospitality sector opposed it due to:

- Concerns over crowd congestion
- Splitting up patrons or groups - Potential impact on patron safety

5. Discretionary Conditions

9.11.15 Broad support (especially from health submitters) for:

- General discretionary conditions in the draft LAP
- Introducing mandatory ID checks for online alcohol deliveries
- Banning buy-now-pay-later (BNPL) alcohol purchases
- Requiring FASD warning signage at off-licence premises
- Setting a minimum price per alcohol unit (e.g., no single sales under \$6)

9.11.16 Retailers raised concerns about:

- Legal overreach ("ultra vires")

- Operational challenges and customer inconvenience

9.11.17 Consensus that discretionary conditions could be helpful — but only if tailored and lawful.

6. Need for Consistency Across Regions (Napier–Hastings)

9.11.18 Multiple submitters emphasized the importance of alignment between Napier and Hastings LAPs to:

- Avoid drunk driving between towns
- Ensure fair conditions for businesses operating in both locations
- Regional consistency seen as essential for public safety and business clarity.

7. Community Voice and Equity

9.11.19 Community Against Alcohol Harm and several others highlighted:

- First hand impacts of alcohol abuse in neighborhoods
- The need to prioritize health and safety over convenience
- That Māori and deprived communities are bearing the brunt of alcohol harm

9.11.20 Calls for the Council to act in the interests of public good, not just business interests.

9.11.21 Supermarkets highlighted the importance of the customer and convenience to shop when they would like to.

8. Legal Concerns & Scope of LAP

9.11.22 Retailers like Foodstuffs and GDL raised concerns that some proposals may be ultra vires — i.e., beyond the powers allowed by the Sale and Supply of Alcohol Act.

9.11.23 They warned of potential legal challenges if LAP policies are not carefully framed.

9.11.24 Legal caution around overregulation was a theme from these submitters.

Final Summary:

9.11.25 The hearing revealed broad agreement on the need to reduce alcohol-related harm, but significant differences in how to do so. The debate centered on where to draw the line between regulation and overreach, and how to balance health equity with economic vitality.

9.11.26 There were several items the Hearings Committee have requested the officer to analyse further:

- FASD Signage in off licenses
- Buy Now pay later – restrictions
- Sinking lids options
- Extending existing restrictions in Flaxmere and Camberley to the entire district or especially high deprivation zones.
- Age Verification for Delivery: Mandatory ID checks for online alcohol sales and deliveries — prevent underage access.
- Single Sales Restrictions: improvement on wording
- Wording for discretionary condition guidance to ensure fits with legal test
- Legal advice regarding impact assessments and incident logs / managers logs
- Morning hours 7-9am for off licenses.

Other notes:

9.11.27 HDC hearings were delegated to a hearings committee of 4, however one was sick on the day. On the day of the hearing, it was brought to my attention that all 3 remaining councilors had some form of previous health background. The councilors made their backgrounds known, and I note that none considered themselves to have a conflict of interest.

9.11.28 It should also be noted that the hearing committee has no delegated powers of decision making and all the submissions and recording of the hearings have been made available to all councillors prior to their decision.

SECTION FOUR: FINAL CONCLUSIONS AND RECOMMENDATIONS

The below details the Current LAP provisions (2019), the first draft LAP proposed changes and subsequently the Officer recommended final draft LAP provisions based on additional evidence and community, stakeholder and licensee feedback through the SCP. The last column presents brief commentary and summary of evidence for each provision, including divergence with Napier City Council. This section should be read in conjunction with the research report and issues and options paper to support a comprehensive policy position.

Licence type	Current LAP Hours	First Draft LAP Hours	Final Draft LAP 2025	Commentary (including consistency with Napier City Council and associated risks of divergence)
On licence: Taverns / Bars Pubs/ Night-clubs Add categories: breweries, cideries, distilleries, Endorsed caterer	8.00 am to 3.00 am the following day Monday to Sunday One way door restriction: mandatory at 2.00 am	Taverns/bars/pubs/night-clubs – breweries / cideries / distilleries / Endorsed Caterer 8.00 am to 2.00 am the following day Monday to Sunday One way door restriction: mandatory at 1.00 am	Taverns/bars/pubs/night-clubs/ breweries/ cideries/ distilleries/ Endorsed Caterer Monday to Sunday 8.00 am to 2.00 am the following day One way door restriction: mandatory at 1.00 am	<ul style="list-style-type: none"> The following matters have been considered in developing a preferred position for the Final Draft LAP on-licence hours provisions Taverns/bars/pubs/night-clubs / breweries / cideries / distilleries / Endorsed Caterer. <p>1. Alcohol Availability, Trading Hours, and Harm</p> <ul style="list-style-type: none"> According to a new study and literature by WHO (2023) there is no safe level of alcohol, “risks of harm start at the first drop”.⁷² The relationship between alcohol availability, trading hours, and alcohol-related harm is well-established. REF: 3,5,11,12,15,24,25,34,35,37,38,39, 49,52,60,61,63,69. Extended trading hours are linked to higher levels of alcohol consumption and equates to an increased risk of harm, including violence, injury, and impaired driving. 3,5,11,12,15,24,25,34,35,37,38,39, 49,52,60,61,63,69. A systematic review of studies examining on-licence trading hours - extended trading hours at on-licence premises was typically followed by increases in the incidence of assault, unintentional injury or drink driving offences and that conversely, restricting trading hours was typically followed by decreases in the incidence of assault and hospitalization. ⁴⁹ 18 Norwegian cities reduced hours - one hour change in trading hours associated with 16% reduction in assaults. Significant impact even small extensions in trading hours can have on violent crime, underscoring the importance of carefully considering the optimal trading hours for reducing harm. ⁶³ The end of 24-hour trading in NZ saw a 11% decrease in weekend hospitalized assaults and 9.7 fewer nighttime assaults per week.¹⁵ Hastings Emergency Department (ED) data shows the highest alcohol related harm occurs after 7pm, particularly on weekends. Hastings alcohol-related ambulance data shows that 639 individuals were transported to hospital via ambulance in the 2024–2025-year, accounting for 50.2% of all alcohol-related hospital arrivals. Notably, over the

				<p>past decade, ambulance arrivals have typically made up only around 26% of total Emergency Department (ED) presentations. However, for alcohol-related cases, the proportion arriving by ambulance has consistently been close to 50%—nearly double the rate of general ED presentations. This suggests a significantly higher severity or urgency associated with alcohol-related incidents. Also noting this takes up valuable ambulance resources and staff.</p> <ul style="list-style-type: none"> • Although unable to provide causality, there has been a drop in alcohol-related ED presentations post the previous LAP implementation. • Hastings alcohol harm police incident data also highlights increases from 7pm and large spikes in alcohol-related incidents between 12am – 3am (accounting for approximately 20% of the total incidents). • Hazardous drinking rates are the highest in Hawkes Bay of all regions in NZ.⁸² • Data indicates that consuming alcohol at a licensed premises between 2am and 3am is associated with a ninefold increase in the likelihood of alcohol-related harm.¹¹ • Research shows that alcohol purchased later in the day is more likely to be bought by heavier drinkers, contributing to increased harm.¹¹ • A reduction in trading hours has both practical and harm reduction benefits, including easing the burden on police, healthcare, and ambulance services. • There is sufficient body of evidence, internationally, nationally and locally to support a reduction in trading hours and is elaborated in the LAP Research Report; Section 4⁷⁸, Issues and Options Paper; Section 4⁷⁹, Council papers⁸⁰, submissions and further evidence provided to council throughout this review process.⁸¹ <p>2. Stakeholder and Community Feedback</p> <ul style="list-style-type: none"> • All statutory stakeholders support a reduction in hours based on the availability theory⁵ and local evidence provided through police incident data and Hospital ED data^{78,79}. (NZ Police, Medical Officer of Health & Inspectors) • Community Survey showed that 51% of respondents wanted shorter opening hour for bars and pubs.²⁹ • Through the Special Consultative Procedure (SCP) - 30 respondents of the total 61 want reduced hours to on licence nightclubs, taverns, bars. Or 65.2% of those who answered the question, wanted reduced hours for this type of licence. • 79% of submitters who answered the question on whether they agreed with the one-way door provision, supported it.
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				<ul style="list-style-type: none"> All statutory stakeholders support maintaining the one-way door policy, as it reduces the likelihood of patrons moving between venues and assists with the egress of patrons at the end of the night. <p>3. Safety of On-Licence Environments</p> <ul style="list-style-type: none"> An on-licence offers a regulated, safer environment for alcohol consumption. For this specific type of licence, hours until 2:00 am may strike an appropriate balance between harm reduction and supporting the nighttime economy. Noting a good nighttime economy is not dependent on alcohol sales or availability. Acknowledging that an on licence can provide a safer environment than an unregulated environment, such as drinking in the home. Supported by literature from Graham (2012)²⁴, which highlights the potential displacement effect of closing on-licence premises too early, leading patrons to continue drinking in unregulated environments. <p>4. Economic and Operational Considerations</p> <ul style="list-style-type: none"> The current excise tax on alcohol falls significantly short of covering its economic cost, shortfall is estimated at \$4 billion annually. This shortfall is effectively subsidized by the general taxpayer.⁵⁸ The need to balance harm minimisation with supporting a thriving local economy emerged as a central theme throughout the hearings. The alcohol industry plays a significant role in the Hawke's Bay region, contributing to the local economy through employment and business activity. At the time of writing this report, a change to 2am closing would affect 4 of 120 premises, or 4 of 24 premises within this category of licenses (taverns, bars, pubs, night-clubs) (noting that this is licensed hours and not all premises utilise their full license hours). Based on inspector knowledge, currently only 2 of these venues regularly stay open to their maximum trading hours of 3am. <p>5. Regional Consistency and Patron Migration</p> <ul style="list-style-type: none"> If a 2am closure was adopted, there could be a one-hour difference in trading hours with Napier City Council (NCC) (as per the deliberations / direction provided to NCC officers at the NCC hearings on 29.4.25, which resulted in a direction to maintain a closing time of 3.00am for NCC). Potential risks of differing on licence bars, nightclub and tavern hours include possible migration of patrons from one area to another causing alcohol related harm, possible increase in traffic offences. There are 4 venues with licensed hours until 3am in Hastings, patrons from
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				<p>those venues may choose to migrate to Napier for later closing, however officers have been made aware this may have already been occurring.</p> <ul style="list-style-type: none"> • Napier's proposed one-way door is at 2am, this may deter very late- night migration from one area to another but will not affect those that may want to travel earlier. • If Hastings adopts significantly earlier closing hours, patrons seeking a later-night experience may choose to go directly to Napier instead. This could result in Hastings losing not only late-night trade but also early-evening patronage, as people may decide to dine and spend the entire evening in Napier on occasion. • Feedback from some licensees during the stakeholder and licensee workshops indicated that such patron migration already occurs, with individuals choosing venues based on their preferences and specific situations. • Stakeholder feedback through the SCP showed strong support for regional consistency. • Licensees, through engagement, expressed strong support for consistency and alignment between local policies to avoid creating competitive advantages. • A taxi ride from Hastings town center to the bars in Ahuriri, Napier, typically costs between \$50 and \$65. The journey takes approximately 18 minutes and covers around 18 km. According to Taxigator, taxi fares in Hastings begin at around \$1.70 per kilometer, with pricing based on both distance and time which may create a potential risk of individuals choosing to drive while intoxicated to avoid such expenses. • Uber estimates a fare of approximately \$65 to \$75 for a trip from Havelock North Centre to Ahuriri on a Saturday night around 10pm. These figures highlight the significant cost associated with travelling to and from Napier, which may also point to a potential risk of individuals choosing to drive while intoxicated to avoid such expenses. • The difference in trading hours may replicate situations seen in areas like Auckland, whereby one area has later trading hours than another, with similar distances and time travel as those between Napier and Hastings. Similarly, other council areas such as Tauranga and Western Bay of Plenty have differing on licence hours (initially a joint policy, then separated), also similar in distance and time between some areas – Tauranga city center to Te Puke (WBP) 20km – 25km, with some areas as close as 5 km. Therefore this scenario is occurring elsewhere.
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				<ul style="list-style-type: none"> The overall impact of different hours to neighbouring Napier is uncertain, and it is difficult to determine whether the effects will be significant or minimal, or the extent to which this is already occurring <p>6. Conclusion There is strong evidence to support the move to closing hours of 8.00am to 2.00 am (1.00am one-way door). However, this needs to be balanced with the prospect of potentially having different closing hours with Napier and the unknown consequences of such a difference.</p>
<p>On licence: café/ Restaurant / winery / winery restaurant Add categories: Hotels (accommodation)</p>	8.00 am to 2.00 am the following day Monday to Sunday	<p>Cafes/restaurants/winery /winery restaurants / Hotels (accommodation – (excluding mini bars)</p> <p>8.00 am to 1.00 am Monday to Sunday</p>	<p>Cafes/restaurants /wineries/winery restaurants / Hotels (accommodation – excluding mini bars)</p> <p>Monday to Sunday</p> <p>8.00 am to 1.00 am</p>	<p>The following matters have been considered in developing a preferred position for the Final Draft LAP on-licence hours provisions for Cafes/ Restaurants/ wineries, winery restaurants /hotels and accommodation (excluding mini bars).</p> <p>1. Evidence</p> <ul style="list-style-type: none"> The same evidential basis as above also applies to on-licence hours provision for Cafes/restaurants/wineries/winery restaurants / Hotels (accommodation). For this specific type of licence, where food is the often the main purpose, hours until 1:00 am strikes an appropriate balance between harm reduction and supporting the nighttime economy. <p>2. Stakeholder and community feedback</p> <ul style="list-style-type: none"> All statutory stakeholders, including NZ Police, the Medical Officer of Health, and Inspectors, are in favour of reducing the hours, in line with the availability theory and local evidence.^{5, 78,79} Through the submission process 32 of the 61 submitters wanted further reduced hours for this licence type - 52.5% of submitters wanted reduced trading hours for restaurants, wineries and winery restaurants. Of those who answered the question, 69.6% wanted reduced hours for this type of licence. <p>3. Economic and Operational considerations</p> <ul style="list-style-type: none"> This would affect 2 premises of 120 premises or 2 of 70 premises within this category. (noting that this is licensed hours and not all premises utilise their full license hours). <p>4. Regional Consistency and Patron Migration</p> <ul style="list-style-type: none"> If a 1am closure was adopted, this would be a one-hour difference in trading hours with NCC. (NCC 2am - as per deliberations / direction provided to NCC Officers at NCC Hearings on 29.4.25) There is less risk with restaurants and cafes than with differing hours with taverns and late-night bars due to the nature of the operations.

				<p>5. Conclusion</p> <p>There is strong evidence to support the move to closing hours of 8.00am to 1.00 am. However, this needs to be balanced with the prospect of potentially having different closing hours with Napier. In this case the risk of people migrating from one area another is not considered as great due to the nature of the operations and that generally people will just go to one restaurant in a night out.</p>
<p>On licence – Entertainment facilities /</p> <p>Add category: Function centres / all other non-specified on licenses</p>	<p>Licensing hours are to be consistent with the nature and activities of the premises and in general shall range from:</p> <p>8.00 am to 2.00 am the following day Monday to Sunday</p>	<p>Entertainment Venues / Function centres and ‘otherwise not specified’ (as per the Sale and Supply of Alcohol (Fees) Regulations 2013)</p> <p>Licensing hours are to be consistent with the nature and activities of the premises and in general shall range from:</p> <p>8.00am to 1.00am the following day Monday to Sunday</p>	<p>Entertainment Venues / Function centres and ‘otherwise not specified’ (as per the Sale and Supply of Alcohol (Fees) Regulations 2013)</p> <p>Licensing hours are to be consistent with the nature and activities of the premises and in general shall range from:</p> <p>Monday to Sunday</p> <p>8.00 am to 1.00 am</p>	<p>The following matters have been considered in developing a preferred position for the Final Draft LAP on-licence hours provisions for Entertainment facilities / function centres / all other non-specified on licenses.</p> <p>1. Evidence</p> <ul style="list-style-type: none"> The same evidential basis as above also applies to on-licence hours provision for Entertainment facilities / function centres / all other non-specified on licenses. For this specific type of licence, where entertainment is the main purpose, hours until 1:00 am strikes an appropriate balance between harm reduction and supporting the nighttime economy. All statutory stakeholders, including NZ Police, the Medical Officer of Health, and Inspectors, are in favour of reducing the hours, in line with the availability theory and local evidence. This change would affect 2 of 120 premises or 2 of 26 premises in this category. (noting that this is licensed hours and not all premises utilise their full license hours). 30 submitters (49.2%, or 68.2% of those who answered the question) wanted reduced trading hours for this category of on licence., <p>2. Regional Consistency and Patron Migration</p> <ul style="list-style-type: none"> If a 1am closure was adopted, this would be a one-hour difference in trading hours with NCC. (NCC 2am - as per deliberations / officers’ direction at NCC Hearings on the 29.4.25) There is less risk with entertainment premises such as bowling alleys etc. than with differing hours with taverns and late-night bars. <p>3. Conclusion</p> <p>There is strong evidence to support the move to closing hours of 8.00am to 1.00 am. However, this needs to be balanced with the prospect of potentially having different closing hours with Napier. In this case the risk of people migrating from one area another is not considered as great due to the nature of the operations.</p>

Off licence – Grocery Stores and Supermarkets	7.00 am to 10.00 pm Monday to Sunday	All off licenses 9.00 am to 9.00 pm Monday to Sunday	All off licenses 9.00 am to 9.00 pm Monday to Sunday	<p>The following matters have been considered in developing a preferred position for the Final Draft LAP off-licence hours provisions.</p> <p>1. Research and Evidence Base</p> <p>Effectiveness of Reducing Trading Hours</p> <ul style="list-style-type: none"> Reducing trading hours for off licenses is an effective strategy for mitigating alcohol-related harm, as shorter hours limit opportunities for "pre-loading," "post-loading," and "side-loading" behaviours where individuals drink before, after, or between visits to licensed venues. ^{3,5,4,9,41,49.} Evidence from New Zealand and international studies suggests that restricting off-licence trading hours, particularly following the 2012 end to 24-hour trading, resulted in a reduction in alcohol-related incidents, such as assaults, particularly among younger adults. Further reductions in trading hours could yield additional benefits. ^{15, 41, 70,37.} A recent study has also estimated that implementing stricter limits on off licence trading hours and density in a package could decrease overall alcohol consumption in NZ by 17.9% resulting in a gain of 450,000 health adjusted life years over the lifetime of the 2018 population.¹² Research shows that alcohol purchased later in the day is more likely to be bought by heavier drinkers, contributing to increased harm. ¹¹ There is substantial research and literature to support a reduction in off licence hours based on the availability theory.^{3,5,11,12,15,24,25,34,35,37,38,39, 49,52,60,61,63,69.} <p>Sales, Availability, and Outlet Types</p> <ul style="list-style-type: none"> Peer reviewed NZ analysis of the relationship between alcohol outlets and harm shows no evidence of a substantive difference in alcohol related harm between alcohol sales from supermarkets when compared to other off licence premises.^g Off-licenses, including supermarkets and grocery stores, sell over 80% of all alcohol in New Zealand. With supermarket and grocery store market share approximately 60% and 30% of all off licence wine and beer sales, respectively. These outlets are easily accessible and often operate with long trading hours, which increases the potential for alcohol-related harm, as alcohol is consumed in unregulated environments where supervision is minimal.^{8,43,75.} Supermarkets and grocery stores are only 11.7% of the off licenses in Hastings, yet supermarket and grocery store market share in NZ are approximately 60% and 30% of all off licence wine and beer sales, respectively.
Off licence – All other off licenses	9.00 am to 10.00 pm Monday to Sunday			
Off licence – remote sales	Any day at Any time SSAA 2012 Delivery: 6.00 am to 11.00 pm	Any day at Any time SSAA 2012 Delivery: 6.00 am to 11.00 pm	Any day at Any time SSAA 2012 Delivery: 6.00 am to 11.00 pm	

				<ul style="list-style-type: none">Both supermarkets and other off licenses typically operate longer hours than comparable businesses. For example, other essential services such as pharmacies often trade from 7am to 5pm, Monday to Saturday or Emergency pharmacy's Monday to Sunday 8am to 8pm. Yet, people adjust their routines to access these services without issue.Research has shown that the introduction of wine sales into New Zealand supermarkets increased the affordability and consumption of wine markedly. A study from Wagenaar and Langley showed that when New Zealand permitted grocery stores to sell table wine products beginning April 1990 with the implementation of a new Sale of Liquor Act. The number of licensed outlets for retail sales of wine for consumption off-premises increased substantially. Using an interrupted multiple time-series design with nation-wide quarterly alcohol sales data from 1983 to 1993, assessed the effects of the policy change on sales of wine. Results from Box-Jenkins time-series models revealed a 17% increase in wine sales associated with the introduction of wine in grocery stores. Increased sales were limited to the specific category of alcoholic beverages permitted in grocery stores--table wine.⁷⁶
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				<p>Harm and Health System Impact</p> <ul style="list-style-type: none"> • According to a new study and literature by WHO (2023) there is no safe level of alcohol, “risks of harm start at the first drop”, This marks a shift from previous guidance that suggested moderate consumption could be acceptable. As a result, stronger or more restrictive policy provisions are increasingly justified, and any reduction in trading hours can contribute meaningfully to reducing alcohol-related harm.⁷² • Even light or moderate long-term use increases the risk of chronic diseases. • Alcohol related ED presentations show there is still acute harm occurring at 7-9am in the morning, albeit at low levels. • ED data shows the highest alcohol related harm occurs after 7pm, particularly on weekends. • Police data show there is still alcohol related harm occurring between 7-9am, however at low levels. • Police data shows that for Flaxmere, over 60% of alcohol related incidents are residential incidents (incidents occurring in the home – therefore alcohol often purchased at an off licence). • Secondary analysis of regional data from the New Zealand Health Survey showed that Hawke’s Bay had the highest rates of hazardous drinking of any district in the country, highlighting the urgent need to address excessive and hazardous alcohol consumption in Hastings.⁸² • A reduction in trading hours may help to support the one in four people who drink hazardously in Hawkes Bay.⁴⁵ • Reduction in hours can reduce harm and help reduce burden on police, health and ambulance staff. • Off licenses contribute significantly to alcohol related harm, with 76% of alcohol consumed by hazardous drinkers purchased from these premises.⁶⁹ • A study on alcohol related ED presentations found the most common place patients purchased alcohol was from off licence premises.³⁵ <p>2. Community Preferences and Submission Feedback</p> <p>Perceptions of Harm</p> <ul style="list-style-type: none"> • In a community survey, supermarkets ranked second (51%) following bottle stores (65%) for the type of alcohol outlet perceived to cause the most harm (where there were multiple answers allowed).²⁹ • The last drinks survey completed for Hawkes Bay (2015/2016), this stated Supermarkets (72%), bottle or liquor stores (54%), and restaurants/café (31%) were where respondents most often purchased alcohol in the last four weeks.⁷⁷
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				<p>Submission Support for Changes</p> <ul style="list-style-type: none"> Through the submission process the majority 31 of 61 submitters and 68.9% of those who answered the question, regarding the reduction of off licence trading hours generally, supported this policy proposition. Noting 16 submitters did not answer this question. Through the submission process, for Supermarkets, of those who answered the question, 58.7% agreed with a later opening hour (9am or 10am) than the current LAP hours (7am). Noting 15 submitters did not answer this question. Through the submission process, for closing time for both supermarkets and other off licenses, 9pm was the preferred option, closely followed by 10pm. Through the submission process, among those who answered this question, 67.4% agreed that supermarkets should have the same hours as all other off licenses and support outnumbered those opposed by just over two to one (29/14) noting 18 did not answer this question. Through the submission process, for Bottle Stores and all other off licenses, of those who answered the question, 86% agreed with an opening hour of 9am or 10am. Noting 18 submitters did not answer this question. Through the submission process, of those who answered the question, 54.3% of submitters wanted an earlier licensed closing hour for supermarkets (8pm or 9pm) and 52.3% wanted an earlier closing for other off licenses. (see section 3.5 for more submission analysis details). <p>3. Stakeholder and Statutory Stakeholder Feedback</p> <p>Statutory Positions and Legal Context</p> <ul style="list-style-type: none"> All statutory stakeholders strongly support a general reduction in hours. (NZ Police, Medical Officer of Health & Inspectors). There is statutory stakeholder support for consistent hours for all license types, including supermarkets and grocery stores. Through the hearings process, stakeholders provided additional context regarding The Supreme Court affirming that a precautionary approach is appropriate when developing and implementing local alcohol policies, allowing for restrictions based on a reasonable likelihood of reducing alcohol-related harm. Stakeholders also noted that the court had highlighted the importance of considering community preferences and the broader legislative context when assessing the reasonableness of LAPs. Provided there is some evidential basis, a Council is entitled to test whether a proposed control might respond to a local problem. A precautionary approach is open to the Council, and in any event a restriction may be
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				<p>justified based on there being a reasonable likelihood that it will reduce alcohol-related harm.</p> <ul style="list-style-type: none"> • This means that restrictions do not need to be proven to have a direct causal relationship with reducing harm, but rather, there needs to be a reasonable expectation that they may be effective. • LAPs reflect policy choices of a Council partly based on, or at least influenced by, community preference. Therefore, they are not (to that extent) required to be evidence-based. There is no one right answer in these circumstances. Requiring particular justification for a departure from the status quo (e.g. the default national trading hours) risks undermining the emphasis on community preference. • Inconvenience factors raised by supermarkets - a combination of likely limited efficacy in terms of reducing alcohol-related harm and significant disruption/inconvenience to those who consume alcohol safely and responsibly (and those who sell alcohol in a safe and responsible way) may result in the restriction being held to be unreasonable in light of the object of the 2012 Act. Shopper convenience may be material to this because, as shown by S3&4 (purpose and object of the Act), the system for the control envisaged by the 2012 Act must be one that provides reasonable opportunities for the safe and responsible sale and supply of alcohol (while minimising alcohol-related harm). • An assessment of two factors will be required: (a) the reduction in alcohol-related harm likely to result if the element is in place; and (b) the likely disruption to safe and responsible drinking that it will cause. • In carrying out the assessment, it is right to recognise that where a system for the sale and supply of alcohol is reasonable and safe with the restriction in place little (and perhaps no) likelihood of reduction in alcohol-related harm (in that case assessed against a counter-factual of 7 am to 11 pm trading hours) may be required, particularly where the restriction accords with the preference of the community. • In addition to the above: LAPs reflect the policy choices of an elected territorial authority. They can be based on or influenced by community preferences. To that extent, they do not have to be evidence-based; The Act contains default maximum trading hours, but local communities are free to choose trading hours which differ from the status quo. Trading hours that are shorter (or longer) than the maximum default hours in the Act do not have to be justified in terms of departure from a norm. Further, although any LAP should be tailored to the council's district, there does not have to
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				<p>be anything particular about that district to warrant deviation from the status quo; Under the Act, the sole ground of appeal against an element in a LAP is that it is unreasonable in light of the object of the Act. That object incorporates two complementary aspects: the safe and responsible sale, supply and consumption of alcohol, and the minimisation of alcohol-related harm. Unreasonableness is therefore likely to come down to whether a restriction is a disproportionate limit on the sale and supply of alcohol, having regard to the likely impact of the restriction on ensuring the sale, supply and consumption of alcohol is safe and responsible, and on harm minimisation.</p> <ul style="list-style-type: none"> It is also noted the Supreme Court did not have the opportunity to consider a 9am opening hour in the Auckland context, as this element was withdrawn by Auckland Council following the ARLA hearing. While this does not diminish the overall findings of the Supreme Court, it is understandable that supermarkets might reference this absence when discussing the reasonableness of such restrictions. <p>Application of the LAP</p> <ul style="list-style-type: none"> Once in place, the LAP is a matter that the DLC (or ARLA) must have regard to in making its decisions. This means there can be exceptions where a licence application that does not align with the LAP and may still be granted. If no objections are received from the community, the DLC is not precluded from issuing a licence, even if the application does not fully adhere to the policy. Therefore, in theory, a supermarket or other applicant could request longer trading hours and potentially get a licence on those terms, therefore providing some flexibility. <p>4. Supermarket Industry Feedback</p> <ul style="list-style-type: none"> Feedback from Supermarket companies noted the need for longer hours than proposed for supermarkets for convenience to shoppers and practicality reasons. Also stating they thought there was insufficient evidence to justify the reduction in hours, particularly the change to morning hours. Officers note that during the submission process Supermarkets did not provide any additional data or customer surveys to support this notion. Certainly, there is nothing to demonstrate that any inconvenience will be significant. Supermarket companies cited the Supreme Courts acknowledgement that shopper convenience may be material to the assessment of whether a restriction in a LAP is unreasonable considering the object of the Act.
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				<ul style="list-style-type: none"> • Supermarkets also noted that unlike other off licence types, supermarkets and grocery stores do not have the main business of selling alcohol, the main business is the sale of food and general groceries. • Supermarkets stated they also have very high compliance and host responsibility standards, checks and balances. • Supermarkets cite the provisions still must be reasonable and proportionate in light of the object of the Act. <p>5. Operational Impacts</p> <ul style="list-style-type: none"> • The reduction to 9pm closing would affect 43 of 111 premises. (noting that this is licensed hours and not all premises utilise their full license hours), this would include one supermarket. • The reduction to a 9am opening would affect 13 grocery stores and supermarkets. (noting this is licensing hours and not actual trading hours). <p>6. Access and Equity</p> <ul style="list-style-type: none"> • Restricting alcohol sales to shorter hours than general supermarket trading times provides an opportunity for people to shop for groceries without being exposed to alcohol. • This approach can support individuals trying to reduce their consumption, as well as those in recovery from alcohol dependence, by reducing temptation and reinforcing a safer retail environment. It also would cater to those who chose not to drink, or those who do not want to be exposed to alcohol during their weekly shop. • Similar initiatives already exist in supermarkets through the implementation of "quiet hours" in late 2019, designed to support neurodivergent individuals such as those with autism.⁶⁴ According to RNZ, Autism New Zealand estimates that 80,000 people are affected by autism. This has led major retailers like Countdown to introduce 'quiet hours' across most stores nationwide. • Given that around 16% of adults in New Zealand (approximately 670,000 people) are classified as hazardous drinkers, and that earlier research (2006) estimated over 100,000 people will experience alcohol addiction or abuse in their lifetime, there is a compelling case for supermarkets to adopt similar inclusive approaches for this group. • If 'quiet hours' are justified and implemented to support 80,000 individuals with autism, similar trading hour restrictions may also be adopted to help the much larger group affected by alcohol-related harm and related disorders. • Within West Auckland, patrons cannot buy alcohol from supermarkets as
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				<p>off-licence supply is controlled by the Portage and Waitakere Licensing Trusts. No supermarkets in the Invercargill Licensing Trust can sell alcohol. People accept and adapt to regulations and restrictions.</p> <p>7. Regional Consistency and Patron Migration</p> <ul style="list-style-type: none">• If different hours were adopted to NCC, (NCC- 7am – 10pm - as per deliberations / officers’ direction at NCC Hearings on 29.4.25) this would have less risk than that of on licenses, as people are less likely to travel distance to get to a later opening off licence.• Other councils including Wairoa have reduced morning hours (10am – 9pm) <p>8. Conclusion</p> <ul style="list-style-type: none">• There is strong evidence to support the move to 9.00pm closing for all off licence types. There is less evidence of acute harm between 7am-9am opening hour for off licenses, however there is still harm present at this time in Hastings.• New literature has been provided to show that no level of alcohol is safe, as well as more consideration of the longer-term effects of alcohol (chronic disease) and the ideation regarding ‘quiet alcohol-free times’ at supermarkets for those who are trying to reduce alcohol consumption, those who choose not to drink or those who are recovering addicts.• In relation to the different closing hours with Napier. The risk of people migrating from one area another is not considered as great due to the nature of the operations.
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Club Licences	Licensing hours are to be consistent with the nature and activities of the club and in general shall range from: 8.00 am to 1.00 am the following day Monday to Sunday	Class One Club (as per The Sale and Supply of Alcohol (Fees) Regulations 2013 - a club licence that has at least 1000 members of the purchase age and in the opinion of the TA, operates any part of the premises in the nature of a tavern at any time.) 8.00 am to 1.00 am Monday to Sunday	Monday to Sunday 8.00 am to 1.00 am	The following matters have been considered in developing a preferred position for the Final Draft LAP club licence hours provisions
Class Two and Three Clubs (as per the definition in the Sale and Supply of Alcohol (fees) Regulations 2013 - that is not a class one or a club that has fewer than 250 members of the purchase age and operates a bar for no more than 40 hours each week)		Class Two and Three Clubs (as per The Sale and Supply of Alcohol (Fees) Regulations 2013 - that is not a class one club) 8.00 am to 12.00 am midnight – Monday to Sunday	Class Two and Three Clubs (as per The Sale and Supply of Alcohol (Fees) Regulations 2013 - that is not a class one club) Monday to Sunday 8.00 am to 12.00 am midnight	<p>1. Evidence</p> <ul style="list-style-type: none"> • Similar evidential basis as for on licenses • Only 6 of the 28 clubs close after midnight, and few extend to 1am. This proposal splits the club license category by club size, in line with fee regulation definitions of clubs, to regulate closing hours based on size of the club and better align with current actual trading hours. • From the submission process, when asked, do you agree with the proposed changes: A reduction in hours for smaller club licenses (from 1am to 12am midnight), of those who answered the question, 67.5% agreed with the reduction of hours for small clubs from 1am to 12am midnight. • Through the submission process, when asked, which option is the most appropriate closing time: earlier than 9pm, 9pm 10pm 11pm 12am 1am 2am? a total of 73% of those who answered the question, wanted an earlier closing time for small club licenses, than that in the current LAP (1am). <p>2. Regional Consistency and Patron Migration</p> <ul style="list-style-type: none"> • If a 12am closure was adopted, this would be a one-hour difference in trading hours with NCC. (NCC 1am - as per deliberations / officers' direction at NCC Hearings on 29.4.25) • There is less risk with clubs than with differing hours with taverns and late-night bars due to the need to be a member of a club to enter, or the need to visitor with a member of the club to attend.

				<p>3. Conclusion</p> <ul style="list-style-type: none"> There is strong evidence to support the move to closing hours of 8.00am to 12.00 am. However, this needs to be balanced with the prospect of potentially having different closing hours with Napier. In this case the risk of people migrating from one area another is not considered as great due to the nature of the operations (you have to be a member of a club or visitor with a member to attend).
Special Licence	Any day at any time	8:00 am to 2:00 am the following day – Monday to Sunday, unless the event is deemed suitable to extend beyond these hours, and the applicant can provide justification for the need for the extended hours. All applications must comply with the District Plan and any applicable Resource Consent.	<p>Monday to Sunday 8:00 am to 2:00 am the following day</p> <p>–unless the event is deemed suitable to extend beyond these hours, and the applicant can provide justification for the need for the extended hours. All applications must comply with the District Plan and any applicable Resource Consent.</p>	<p>The following matters have been considered in developing a preferred position for the Final Draft LAP special licence hours provisions</p> <p>1. Evidence</p> <ul style="list-style-type: none"> Events can significantly contribute to alcohol-related harm if not properly regulated and managed. Similar evidential basis as for on licenses, the effects of hours on access on alcohol related harm applies to special licenses too. Inspectors note that alcohol is commonly consumed at events, and patrons often continue drinking at on-licence premises afterwards. This pattern contributes to increased overall alcohol consumption and associated harm, both acute and chronic. This provision ensures that events align more closely with other late-night trading. Through the submission process, of those who answered the question, 53.8% (21 Submitters) agreed with an opening or closing time for special licenses. Noting a large proportion did not answer this question (22 out of 61). <p>2. Operational Impacts</p> <ul style="list-style-type: none"> Most special licenses in the district align with the proposed hours, with only a few exceptions. This provision also allows the DLC and ARLA to grant extended hours based on the type of event. It is important to note it is expected the policy position is to ensure the hours are appropriate and reasonable for each individual event. The proposed hours are not intended to set an expectation that the DLC and ARLA will always issue licenses for the full duration. <p>3. Regional Consistency</p> <ul style="list-style-type: none"> NCC has not proposed a special licence trading hour provision, however this will not have any significant effect in relation to migration of patrons. As this provision is flexible and most events already fit within these hours, it should not have any effect on events coming to Hastings.

				4. Conclusion <ul style="list-style-type: none"> There is strong evidence to support the move to closing hours of 8.00am to 2.00 am with flexibility where it is appropriate. In this case the risk of people migrating from one area another is not considered as great due to the nature of the provision.
Location and Density provisions				
Provision	Current LAP	First Draft LAP	Final Draft LAP 2025	Commentary and evidence summary (including consistency with Napier City Council and associated risks of divergence)
Density provisions - Whether further licenses (or licenses of a particular kind or kinds) should be issued for premises in the district concerned, or any stated part of the district	No further off licenses being a bottle store on land located in – Flaxmere Commercial Service or Suburban Commercial zone or Flaxmere Village Centre Zone Camberley - suburban commercial zone identified in Map 2.	No further off licenses being a bottle store on land located in – Flaxmere Commercial Service or Suburban Commercial zone or Flaxmere Village Centre Zone or residential area. Camberley – suburban commercial zone identified in Map 2.	No further off licenses being a bottle store on land located in – Flaxmere Commercial Service or Suburban Commercial zone or Flaxmere Village Centre Zone or residential area. Camberley – suburban commercial zone identified in Map 2.	<p>The following matters have been considered in developing a preferred position for the Final Draft LAP Location and Density provisions</p> <p>1. Support for Existing Provisions</p> <ul style="list-style-type: none"> There is strong support that the current provisions are protecting the most vulnerable populations in Hastings. Through the SCP, submitters were asked if they agreed with the location and density provisions, of those who answered the question, 82% agreed with the current location and density provisions. <p>2. Current Licensing Context</p> <ul style="list-style-type: none"> Hastings has one licence for every 331 people. 30% more licenses than the national average. Hastings has 111 off licenses, however noting that Hastings is a wine region and 70 of those are remote sellers or cellar doors. There are a total of 10 bottle stores. It is noted that the number of off licenses has remained relatively stable for many years. Licences are mostly in town centres and these areas are inherently lower socioeconomic. Evidence provided by the Medical Officer of Health indicated that due to Hastings compact size, it means most locations are within a 5–10-minute drive to an off licence, further contributing to alcohol accessibility and to associated alcohol related harm. <p>3. Research and Literature on Density and Harm</p> <ul style="list-style-type: none"> There is literature to support density of alcohol outlets being closely linked to increased harm. Research has also shown that density of supermarkets and grocery stores selling alcohol is associated with a range of alcohol related harms across the North Island. ⁸

				<ul style="list-style-type: none"> Off licence density is associated with shorter travel distances, longer opening hours and price competition, which correlates with heavy episodic drinking and alcohol related problems.^{7,16} Policy mechanisms which prevent licensed premises from establishing too close to each other (rules stating 50,100 metres apart) could help to control density and result in reduced harm. <p>4. Assessment and Planning Considerations</p> <ul style="list-style-type: none"> An analysis was conducted to assess potential new areas for inclusion. The District Plan excluded large areas where new licenses could establish, leaving only a small number of dispersed pockets of suburban commercial land where premises can establish. Restricting further licenses in additional areas may cause clustering of licenses just outside these areas or force additional licenses to cluster inside of the town centre area increasing density. This option may cause unintended consequences. <p>5. Consistency with Napier</p> <ul style="list-style-type: none"> Napier have density provisions. <p>6. Conclusion</p> <p>There is strong evidence to support for current density provisions. Officers believe there are other provisions within the LAP and conditions relating to amenity and good order that can help to mitigate any further issues in these areas.</p>
Discretionary Conditions				
Provision	Current LAP	First Draft LAP	Final Draft LAP 2025	Commentary and evidence summary (including consistency with Napier City Council and associated risks of divergence)
On licenses / club licenses	<ul style="list-style-type: none"> CCTV cameras (location and number) Provision of effective exterior lighting No serving in glass containers at specified times Number of door-staff and provision of additional security staff after specified times 	<p>In addition to the current LAP:</p> <ul style="list-style-type: none"> Utilise the principals of Crime Prevention through Environmental Design. (CPTED) Require impact assessments by an applicant if a premises is in a particularly low socio- 	<p>In addition to the current LAP:</p> <ul style="list-style-type: none"> CCTV cameras (location and number - keeping recordings for at least 28 days) Utilise the principals of Crime Prevention through Environmental Design. (CPTED) 	<p>The following matters have been considered in developing a preferred position for the Final Draft LAP Discretionary Conditions.</p> <p>1. Evidence</p> <ul style="list-style-type: none"> Additional elements will further provide DLC's with options for the licensing process to help alleviate issues with amenity and good order and assist in the reduction of alcohol related harm. Statutory Stakeholder support for proposed discretionary conditions Through the SCP, submitters were asked if they agreed generally with the discretionary conditions, of those who answered the question 64% agreed. <p>2. Other comments and legal position</p>

	<ul style="list-style-type: none"> Management of patrons queuing to enter the licensed premise Limit on the number of drinks per customer at specified times No shots or types of drinks to be served after specified times Limit on drink sizes after specified times Conditions relating to management: such as certificated staff required if the maximum occupancy exceeds a prescribed number or if recommended by Police or the Inspector, requirement for multiple managers etc. One way door restrictions Provision of transport for patrons Restriction on the use of outdoor areas after a specified time Club specific - Conditions relating to management: such as certificated staff required at all clubs unless the bar is 	<p>economic area or an area known to have ARH issues. This impact assessment should detail how the applicant will mitigate any issues with amenity and good order and may result in conditions imposed on the licence to ensure the minimisation of alcohol related harm on the surrounding community.</p> <ul style="list-style-type: none"> Maintain and provide as a part of the application process and upon request from an inspector or NZ Police, supply an incident register of alcohol related incidents and mandatory reporting of violent incidents to NZ Police. Maintain and provide upon request a duty manager register. 	<ul style="list-style-type: none"> Maintain, and provide upon request from an inspector or NZ Police, an incident register of alcohol related incidents. Mandatory reporting of violent incidents to NZ Police Maintain, and provide upon request from an inspector or NZ Police, a duty manager register. 	<ul style="list-style-type: none"> Feedback from multiple submitters suggests a misunderstanding of the nature of discretionary conditions, with comments indicating they are being interpreted as mandatory when they are not. The guidance preceding the discretionary conditions to clarify that these conditions are not to be applied by default. They must be used selectively, and only where they are proportionate, fair, balanced, and respond to a clearly identified risk. Legal has also revised the wording of several discretionary conditions Officers note that additional discretionary conditions can be added into a practise note, separate to the LAP, to prevent the requirement of another SCP. NZ Police also noted that developing a separate guidance document to accompany the LAP to the DLC would be a positive step, providing direction on potential licence conditions and other measures to address alcohol-related harm <p>3. Conclusion</p> <ul style="list-style-type: none"> There is strong evidence to support each discretionary condition provision. ^{78,79, 4} Required amendments have been made to ensure the wording is legal, clear and robust.
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	staffed voluntarily and membership is below a prescribed number.			
Off licenses	<ul style="list-style-type: none"> Display of safe drinking messages/material 	<ul style="list-style-type: none"> In addition to the current LAP: CCTV cameras (location and number - keeping recordings for at least 28 days) Provision of effective exterior lighting Limit on alcohol related exterior signage or advertising to 30% of the building or glass exterior. Utilise the principals of Crime Prevention through Environmental Design. (CPTED) Require impact assessments by an applicant if a premises is in a particularly low socio-economic area or an area known to have issues. Maintain and provide as a part of the application process and upon request from an inspector or NZ Police, supply an incident register of 	<ul style="list-style-type: none"> In addition to the current LAP: CCTV cameras (location and number - keeping recordings for at least 28 days) Provision of effective exterior lighting. Limit on alcohol related exterior signage or advertising to 30% of the building or glass exterior. Utilise the principals of Crime Prevention through Environmental Design. (CPTED) Maintain, and provide upon request from an inspector or NZ Police, an incident register of alcohol related incidents. Mandatory reporting of violent incidents to NZ Police Maintain, and provide upon request from an inspector or NZ Police, a duty manager register. 	<p>1. Evidence</p> <ul style="list-style-type: none"> Evidential basis is the same as per the above. Submission analysis is as per the above. <p>2. Additional Discretionary Conditions from Submitters</p> <ul style="list-style-type: none"> Submitters provided additional discretionary conditions which warranted research and proved to be very beneficial in including to help reduce alcohol related harm, these include: <ul style="list-style-type: none"> restrictions relating to method of payment (such as no sale using a Buy now pay later Contract, as that term is defined under the Credit Contracts and Consumer Finance Regulations 2004) - As these options entice the consumer with a much lower upfront price. Research shows that the use of BNPL services to purchase alcohol increases its perceived affordability, which can lead to greater consumption and related harms. Requirement of mandatory age checks on purchase and delivery - Research completed in Auckland showed that in 73% of alcohol orders, age verification was not required on delivery, 49% of alcohol orders were left unattended at the door and 87.5% of delivery companies broke their own restricted items policy. Alcohol delivered without an ID check may make it easier for under 18-year-olds to access alcohol. A4 Pregnancy warnings signs at point of sale FASD levels are high in NZ and almost half of the total alcohol related harm costs to NZ, come from FASD. <p>3. Legal Considerations and Risk</p> <ul style="list-style-type: none"> There is good evidence to support the addition of these conditions, however due to certain conditions not being included in the first draft LAP, there is some legal risk of challenge. The community have not had the opportunity to comment on these conditions. It may require a new SCP to include these provisions without legal challenge. Therefore, it may be more beneficial to add these within a LAP practise note to the DLC, outside of this process. Legal has revised the wording of several discretionary conditions

		<p>alcohol related incidents and mandatory reporting of violent incidents to NZ Police.</p> <ul style="list-style-type: none"> • Maintain and provide upon request a duty manager register. • Low alcoholic drinks and 0% alcohol beer to be available for sale. • No end of Isle sales of alcohol for Supermarkets and grocery stores. 	<ul style="list-style-type: none"> • Low alcoholic drinks and 0% alcohol beer to be available for sale. • There shall be no single sales of high strength beer or cider that is 500ml and under and stronger than 5.5% ABV for under \$x.xx, (price to be imposed by the DLC following an application.) 	<p>4. Removed Conditions and Alternative Wording</p> <ul style="list-style-type: none"> • One condition that has been removed was: restricting the end of aisle sales of alcohol products, this has shown to increase sales by as much as 23-43% and would of have had a significant impact on alcohol consumption. Wording can be amended to include this condition as per below, however still carries some risk of challenge. <ul style="list-style-type: none"> • <i>That a single alcohol area (SAA) in a supermarket or grocery store shall contain no aisle-end displays [that face out from the single alcohol area and into the main shopping area] (whereby reason of the location of the SAA and its proximity to passing shoppers in the supermarket, the level of shoppers' exposure to alcohol displays is not limited so far as is practicable).</i> • Wording has been amended on the single sales condition, to ensure it is a prescriptive and legal. The same has been completed for the managers register and incident logs. <p>5. Conclusion</p> <ul style="list-style-type: none"> • There is strong evidence to support each discretionary condition provision. • Officers acknowledge that including additional discretionary conditions at this stage may be subject to legal challenges or the need for a further Special Consultative Procedure. However, a guidance document or practice note can still be developed separately from the LAP process to support implementation. • Required amendments have been made to listed discretionary conditions to ensure the wording is legal, clear and robust.
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Special licenses	<ul style="list-style-type: none"> Restriction on the type of drinks sold the alcohol percentage of the drinks and the type of containers the drinks are served in One way door restrictions 	<ul style="list-style-type: none"> Restriction on the type of drinks sold, the alcohol percentage of the drinks and the type of containers the drinks are served in One way door restrictions Requirement of a separate line or service area for non-alcoholic beverages where the special licence is likely to have patrons that are under the legal drinking age. <p>For Class one events</p> <ul style="list-style-type: none"> Security Staff, porta loos and rubbish bins provided in the surrounding areas to assist with issues with amenity and good order. No full bottle wine sales for onsite consumption Serve reduction systems in place to manage intoxication levels – maximum serves of 2 per sale reducing to 1. Prescribed ratio of security staff to patrons 	<p>In addition to the current LAP:</p> <p>For Class one events</p> <ul style="list-style-type: none"> Security Staff, porta loos and rubbish bins provided in the surrounding areas to assist with issues with amenity and good order. No full bottle wine sales for onsite consumption Serve reduction systems in place to manage intoxication levels Prescribed ratio of security staff to patrons High visibility clothing to be worn by security staff and be visible to others. Means of ingress/ egress for emergency services 	<p>1. Evidence</p> <ul style="list-style-type: none"> Evidential basis is the same as per the above. Submission analysis is as per the above. <p>2. Other comments and legal position</p> <ul style="list-style-type: none"> Additional elements will further provide DLC's with options for the licensing process to help alleviate issues with amenity and good order and assist in the reduction of alcohol related harm. Statutory Stakeholder support for proposed discretionary conditions Feedback from multiple submitters suggests a misunderstanding of the nature of discretionary conditions, with comments indicating they are being interpreted as mandatory when they are not. There was strong support from event licence holders, through the submission process, for discretionary conditions to be carefully assessed for their appropriateness to the specific event, rather than being applied indiscriminately or as a standard requirement. Legal considerations as per above in regard to on licenses apply to this licence type also. Amend the serve reduction condition to remove any specific quantity, allowing the District Licensing Committee (DLC) to determine appropriate limits based on the event's type, risk profile, history, and ensuring the condition is reasonable and proportionate. <p>5. Conclusion</p> <ul style="list-style-type: none"> There is strong evidence to support each discretionary condition provision. Required amendments have been made to ensure the wording is legal, clear and robust.
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		<ul style="list-style-type: none">• High visibility clothing to be worn by security staff and be visible to others.• Means of ingress/ egress for emergency services• Submission of Applications at least 25 working days prior to the event to allow for processing and potential stakeholder meetings• A sufficiently detailed Alcohol Management Plan as per Section 143 of the SSAA 2012.		
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1.0 Final comments

1.1 Divergence with Napier City Council

- 1.1.1 On 29 April, Napier City Council (NCC) held its hearings and proceeded to deliberations. Councilors expressed a preference to reverse the draft Local Alcohol Policy (LAP) provisions that were sent out for community consultation and instructed officers to revert to the more permissive trading conditions of the previous LAP (i.e. on-licenses: 8am–3am; off licenses: 7am–10pm for supermarkets, and 9am–10pm for all other off licenses).
- 1.1.2 NCC intends to proceed directly to adoption of the Final LAP based on Councilors' recommendations at its 26 June meeting.
- 1.1.3 This creates the potential for policy divergence between Hastings and Napier. Potential areas of misalignment include:
- **Trading Hours:**
 - On-licence hours
 - Off-licence hours
 - Club licence hours
 - Special licence hours
 - **Discretionary Conditions**

1.2 Issues and Options Regarding Possible Divergence

- 1.2.1 Hastings District Council (HDC) officers maintain there is a strong body of evidence supporting reduced trading hours across all licence types.
- 1.2.2 Officers consider there is minimal risk associated with differing hours for off licenses, club licenses, special licenses, or with differing discretionary conditions.
- 1.2.3 However, divergence in hours for taverns, bars, and nightclubs presents some risk. While cross-district patron movement is a concern, whereby it may have the effect of increasing alcohol related harm via traffic offences, officers note:
- Such movement may already be occurring between premises and districts.
 - Only four premises in Hastings are licensed until 3am, and just two regularly utilise these hours. Napier has a similar pattern.
 - If Napier permits later hours, there is a risk patrons may favour Napier over Hastings, potentially impacting early-evening trade in Hastings.
 - The proposed one-way door policies (indicated 2am in Napier; 1am proposed for Hastings) may reduce late-night movement between districts.
 - Both stakeholders and licensees strongly support policy alignment, citing concerns about alcohol-related harm and the need for a level commercial playing field.
 - Other regions, such as Western Bay of Plenty and Tauranga, or areas within Auckland and the South Island, operate with differing trading hours over similar distances with neighbouring areas.
 - Hastings' nightlife has a different character and clientele compared to Napier.
 - The actual impacts of divergence remain uncertain.

1.3 Options for HDC

1. Approve the proposed reduced hours, based on local evidence and feedback.
2. Approve the reduced hours with a built-in impact assessment after 12–18 months to evaluate commercial effects and alcohol-related harm.
3. Revert on-licence hours for nightclubs, taverns, and bars to 3am with a 2am one-way door restriction, aligning with NCC's intent to retain the previous LAP provisions and approve the remainder of the proposed LAP
4. Propose a different set of provisions for the LAP

1.4 Officer Recommendation

- 1.4.1 Officers recommend a 2am closing time for bars and taverns, accompanied by a built-in review and impact assessment mechanism. This would involve monitoring relevant indicators (e.g. traffic offences) at 6 and 12–18-month intervals and engaging with licensees to assess emerging issues or commercial impacts. Should adverse effects be identified, a review of the LAP can be initiated based on new evidence. (Note: HDC is not legislatively bound to the six-year review cycle; a review can occur at any time.)
- 1.4.2 While other differences between the two policies may arise (e.g., in relation to special licenses, club licenses, off licences, or café/restaurant hours), officers do not anticipate these discrepancies will present significant risks.
- 1.4.3 Officers also note that similar divergence occurred at the same stage of the previous joint LAP process. On that occasion, Hastings ultimately aligned with Napier by adopting the more permissive on-licence trading hours (3am for on licenses; Bars, Taverns and Nightclubs and 2am for all other on licenses).

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Appendix one: Submissions Spreadsheet

This spreadsheet contains the submissions and comments made by each submitter. Where the submission was substantial (not on an online form) details have been transcribed where they could be, into the below document. Due to the amount of research and comments each submstantial submission contained, it was not always possible to transcribe, in total, the comments made. Please refer to the actual submissions within the submission binder for full details and submitters literature / academic references.

ON LICENCE HOURS

entry sub #	Type	Name	Last	Submission category	Representing organisation or business	Agree/disagree with changes: 1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	Most appropriate closing time?	Agree with the one way door provision?	Agree / Disagree: Reducing closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	Most appropriate closing time?	Agree/Disagree: Reduce closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Most appropriate closing time?	8. Any other comments:
1	Form	Allen	Scott	Individual	Individual	No	3am	Yes	No	2am	No	2am	
2	Form	Alex	Kersjes	Individual	Individual	No	4am	Yes	No	3am	No	3am	Oppose reduction in hours: This policy is not evidence-based and directly harms an already struggling industry, which plays a vital role in the vibrancy, economy, and social life of our region. Before imposing further restrictions, the Council must present clear evidence demonstrating that an additional hour of operation is directly responsible for increased harm. Impact on Hastings' Nightlife & Economy - Hastings is already struggling with a lack of nightlife, and this restriction will only make it worse. Hospitality venues need every hour they can get to survive, particularly after years of economic hardship. Patrons, especially those with disposable income, will choose to go elsewhere, further harming local business. Reducing licensed premises' hours does not reduce drinking—it just pushes it into uncontrolled environments where harm is far more likely to occur. Licensed venues are regulated spaces with security, responsible hosts, and emergency response capabilities. Personal Perspective – Freedom of Choice rather than restricting local venues, the Council should be investing in them, working with operators to enhance safety measures, and supporting a thriving nightlife industry.
3	Form	Parwinder	Nagra	Individual	Individual	No	3am	No	No	2am	No	3am	
4	Form	Balwinder	Sandhu	Licensee	Big Barrel Hastings	Yes	1am	Yes	Yes	1am	Yes	1am	
5	Form	Bruce	Nimon	Licensee	Kokako Farms	Yes	2am	No	Yes	1am	Yes	1am	
6	Form	John	van den Berk	Business	John's Bakery ltd	No	3am	No	Yes	12am	No	2am	
7	Form	Daniel	Nelson	Licensee	Haha Wine Company	No	3am	Yes	No	2am	No	2am	
8	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club inc.	Yes	2am	Yes	Yes	1am	Yes	1am	With the down turn in hospitality i agree to reduced hours. If it is proved it can reduce alcohol related incidents i am all for it.
9	Form	Anita	Gaylard	Licensee	KartSport Hawkes Bay	No	2am	Yes	No	2am	No	2am	
10	Form	peter	steers	Licensee	Hawks Bay and East Coast Aero club	Yes	2am	Yes	Yes	1am	Yes	1am	

11	Form	Len and Marie	Mitchell	Individual	individual	Yes	1am	Yes	Yes	12am	Yes	1am	restaurants should close at a reasonable hour, who eats at 1am in the morning. 1 or 2am is plenty for others.
12	Form	Kim	Parker	Individual	individual	No	3am	No	No	3am	No	3am	
13	Form	Will	Coltart	Individual	individual	No	3am	Yes	Yes	1am	Yes	1am	
14	Form	Shankar	Gc	Licensee	Gengy's Hastings	Yes	2am	Yes	Yes	1am	Yes	1am	
15	Form	Grant	Edmonds	Licensee	Redmetal Vineyards	Yes	2am	Yes	Yes	1am	Yes	1am	
16	Form	Kate	Galloway	Licensee	Mobius Wine Ltd	No	3am	No	No	2am	no answer	2am	
17	Form	Rachelle	Adams	Licensee	Element Vineyard Ltd	Yes	2am	Yes	Yes	1am	Yes	1am	
18	Form	James	Ludlam	Licensee	President Kia Toa Bowling Club	Yes	2am	no answer	No	12am	Yes	1am	
19	Form	Kate	RADBURN	Licensee	Radburn Cellars	Yes	2am	Yes	Yes	1am	Yes	1am	
20	Form	Guillaume	Thomas	Licensee	Maison Noire Ltd	Yes	2am	Yes	Yes	1am	Yes	1am	
21	Form	Song	Han	Licensee	clive four square	Yes	12am	Yes	Yes	12am	Yes	12am	
22	Form	Greg	Duff	Licensee	Clive Hotel	Yes	2am	Yes	Yes	1am	Yes	1am	Nothing Good happen after 10pm. That why we are closed by 10pm even though our license runs through to midnight.
23	Form	Jim	Poppelwell	Individual	individual	No	3am	No	No	2am	no answer	2am	
24	Form	Sean	Burns	Licensee	AONZ Fine Wine Estates	Yes	2am	Yes	Yes	1am	Yes	1am	
25	Form	Tash	Stuck	Licensee	Level 1	No	3am	No	No	2am	No	3am	
26	Form	barbara	abbott	Individual	individual	Yes	2am	Yes	Yes	1am	Yes	1am	
27	Form	Liz	Pollock	Licensee	LIZ POLLOCK & ASSOCIATES LTD	Not Answered	no answer	no answer	No Answer	no answer	no answer	no answer	
28	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club	Yes	2am	Yes	Yes	1am	Yes	1am	
29	Form	Daniel	Pistone	Licensee	Sazio	Yes	2am	No	Yes	1am	Yes	1am	
30	Form	Karnak	Heremia	Individual	individual	Yes	2am	Yes	Yes	1am	Yes	1am	
31	Form	Alex	Hedley	Individual	individual	Yes	2am	Yes	Yes	1am	Yes	1am	
32	Form	cliff	Fernandes	Licensee	lot 2	Yes	2am	Yes	Yes	1am	Yes	1am	
33	Form	jess	trew	Individual	individual	Yes	2am	Yes	Yes	1am	Yes	1am	I support the proposed reduction in hours for on-licence and off-licence alcohol venues because it's a practical step towards reducing alcohol-related harm in our community. Limiting the hours of sale can help decrease incidents of alcohol-fuelled violence, accidents, and health issues. Research shows that reduced trading hours are linked to lower rates of hospital admissions, crime, and harm in public spaces. This change prioritises community wellbeing and helps create a safer, healthier environment for everyone.
34	Form	Houkamau	Potae	Individual	individual	Yes	2am	Yes	Yes	1am	Yes	1am	
35	Form	Evelyn	Jirkowsky	Individual	individual	No	1am	Yes	No	12am	Yes	1am	
36	Form	Mala	Bishop	Stakeholder	Hastings District Council	Yes	2am	Yes	No	12am	Yes	1am	In relation to hours, it seems unlikely people would be dining at 1.00am. We suggest reducing to 12.00am. If a restaurant was holding an event such as a wedding a special licence could be applied for.
37	Form	Trevor	Smith	Licensee	Big Barrel Stores	Not Answered	no answer	no answer	No Answer	no answer	no answer	no answer	

38	Form	Beth	Elstone	Licensee	Littlestone	Yes	2am	Yes	No	2am	No	2am	
39	Form	Taylor	Bevan	Stakeholder	Hastings Youth Council	No	no answer	Yes	No	no answer	No	no answer	Reducing closing hours of on-licence venues in general could push social gatherings involving youth into less regulated, unsafe environments like house parties or street drinking. Venues provide a controlled setting with security and trained staff, helping to ensure safer nights out. Cutting an hour from licensed nightlife doesn't stop late-night socialising, but rather makes it riskier. Additionally, many young people work in the hospitality industry, often relying on late-night shifts to earn a living while studying or supporting themselves. Reducing closing hours would cut these shifts short, leading to fewer job opportunities and reduced income for youth. This change not only impacts their financial stability but also limits valuable work experience in a competitive job market.
40	Form and Substantial	Nathan	Cowie	Stakeholder	Community against Alcohol Harm	yes	2am	yes	yes	1am	yes	1am	We support the proposed reduction in on-licence hours to 8am through 2am, and the one way door policy from 1am. We support a reduction of closing hour for cafes, restaurants, wineries, winery restaurants. We submit that between midnight and 2am these premises are likely operating in the manner of taverns.
41	Form written	jessie	Moir	Individual	individual	no	11pm	yes	no	11pm	no	11pm	
42	Form written	Hayley	Hansen	Individual	individual	no	4am	yes	no	4am	no	4am	
43	Form written and substantial	Rachael	Gresham	Individual	individual	no	1am	yes	yes	1am	yes	1am	I believe the current framework does not look after the young people in our community. The current drinking behaviour of a lot of young people in Hawke's Bay is to drink alcohol from around 5pm - 6pm at a home/flat until around 10.30 - 11.00pm. At this point they move to a pub of choice where they will continue to drink alcohol until 3am. This pattern is because they cant afford to be at the pub for 8 hours. THIS IS FAR TOO LONG. Nothing good happens when anyone, particularly young people, drink alcohol for this length of time. Good people (region wide) are making dumb decisions because they are drinking alcohol over too many hours. The 3am finish perpetuates irresponsible behaviour and does not provide for our young people's health. Closing time should be 1 am at the latest. Frankly, I think it should be midnight. People will still go to drinking establishments because this is the nature of young people who want to meet friends and partners and they will probably end up spending more money in these same places as they will spend less on drinking at private residences. They will go earlier to the pubs as they won't want to cut themselves short of socialising time. Most importantly, they won't be exposed/encouraged to drink for hours on end and will get to bed earlier. Less of them will make stupid decisions and more of them will function productively in our communities after a better night's sleep.
44	email substantial	Brent	Eccles	Individual	individual	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
45	substantial	Kristine	Larner	Stakeholder	Hawkes Bay Tourism Industry Association	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
46	substantial	Hamish	Saxton	Stakeholder	Hawkes Bay Tourism	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
47	substantial	Ashleigh	Rhodes	Licensee	Foodstuffs North island	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	

48	substantial	Nina	Dally	Licensee	Woolworths NZ	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
49	substantial	Marisa Bidois		Stakeholder	Restaurants Association	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	Compared to international standards, New Zealanders traditionally eat dinner and go to bed earlier than many countries around the world. We rely heavily on international tourism to thrive - service a wide variety of customer preference. We recommend that any hours of trade are set by specific licence type — rather than a broad on-licence versus off-licence categorisation. We recognise that the proposed 2am on-licence restriction may be appropriate for night clubs, however we submit that greater flexibility is needed for venues such as Class 3 restaurants with an on-licence, and submit that flexibility around classes of specific on-licence types is aligned with the weighting and times specified in section 5(4) of the Sale and Supply of Alcohol (Fees) Regulations 2013.
50	substantial	Kim	Thorp	Licensee	Blackbarn	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
51	substantial	hamish	Gordon	Licensee	Shed 530	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
52	substantial	Carl	Woodman	Licensee	Shed 530	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
53	substantial	Kel	Dixon	Licensee	shed 530	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
54	substantial	Shane	Phillips	Stakeholder	Hospitality Association NZ	no	3am	no answer	no	no answer	no	no answer	<p>We do not believe reducing closing hours for on-licensed venues in Hastings will meaningfully minimise alcohol-related harm in line with the objective of the SSAA 2012. Hospitality NZ believes well-run licensed venues play a key role in supporting safe and responsible consumption of alcohol. By reducing on-premise hours, there is a risk it pushes consumption of alcohol to unlicensed environments, potentially working against the Council's aims of reducing alcohol-related harm. We also believe further consideration should be given to the economic effects of reducing</p> <p>trading hours. As 1 of 12 Great Wine Capitals of the World, among other accolades, Hawke's Bay is a premier destination for both international and domestic visitors, and has built its brand on elevated tourism and hospitality experiences. These visitors expect opportunities to enjoy a region's vibrancy at all hours of the day, and reducing hours doesn't support the aims of the region looking to drive a thriving visitor economy.</p>
55	proforma	Aaron	Mills	Bussiness	Havelock North Motor Lodge	no	3am	no answer	no	no answer	no	no answer	<p>We do not believe reducing closing hours for on-licensed venues in Hastings will meaningfully minimise alcohol-related harm in line with the objective of the SSAA 2012. Hospitality NZ believes well-run licensed venues play a key role in supporting safe and responsible consumption of alcohol. By reducing on-premise hours, there is a risk it pushes consumption of alcohol to unlicensed environments, potentially working against the Council's aims of reducing alcohol-related harm...</p>
56	substantial	Jennifer	Lamm	Stakeholder	Alcohol Healthwatch	yes	2am	yes	yes	1am	yes	1am	<p>Reducing trading hours is a key strategy for reducing alcohol-related harms. Studies have shown that hazardous drinking increases with longer hours and greater availability. This reality is reflected in the current trends for councils to reduce trading hours in their LAPS's. We are also pleased to see that the LAP has reduced the closing times for on-licences, as earlier closing times help reduce the incidence of serious crime that often occurs with later closing times due to people's higher levels of intoxication. However, we recommend a later opening hour for on-licences (such as taverns, bars, night-clubs) and club licences, as</p>

													longer trading hours are associated with an increase in hazardous drinking.
57	substantial	Matt	Radford	Stakeholder	Health NZ	yes	2am	yes	yes	1am	yes	1am	Support for hours: Alcohol poses not only acute harm but long tern harms. Alcohol affects all of us: The Emergency Department (ED) data shows the highest alcohol-related harm is after 7pm, particularly on weekends. Alcohol harm data from police also highlights a spike in alcohol-related incidents in Hastings between 12am and 3am. People purchasing alcohol later in the evening are more likely to be heavy drinkers. Reducing trading hours is beneficial to reducing harm. The introduction of maximum trading hours in New Zealand in 2013 for both on- and off- licences (previously no time restriction) was associated with a decline in physical assaults documented by police and ED attendances. While unable to prove causality, there has been a drop in alcohol-related ED presentations post Napier and Hastings' previous LAP being implemented. The community survey showed that 51% of respondents wanted shorter opening hours for bars and pubs. The proposed reduced hours are in keeping with other TLAs in Hawke's Bay (Wairoa: 9am to 1am for on-licences,18 Central Hawke's Bay: 8am to 1am for on-licences).19 Finally, this proposed reduction in hours will only affect around 5% of on-licence holders.
58	substantial	Michael	Swan	Licensee	Liquid Events	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	No comments
59	written form	Kowhai	Kahika	Individual	individual	no	4am	no answer	no	11pm	no	4am	
60	substantial	Reuben		Licensee	Madcap Music	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
61	pro forma	Reuben	Vergis	Licensee	Outfield Festival	Not Answered	no answer	No Answer	No Answer	no answer	no answer	no answer	
62	substantial	Ray	Wylie	Stakeholder	NZ Police	yes	2am	yes	yes	1am	yes	1am	Police believe that the maximum trading hours should be between 8am and 2am the following morning for on licensed premises and One way door condition from 1am (or one hour before close) There is strong international and domestic evidence that supports the proposition that the longer licensed premises are open, the more alcohol related harm that can be attributed to them. Reductions in hours of sale for both on and off licensed premises are associated with reduced alcohol harm. As well as this rates of violence in and around entertainment precincts are clearly affected by changes to trading hours late at night.

OFF LICENCE HOURS

entry sub #	Type	Name	Last	Submissio n category	Representing organisation or business	Agree/ Disagree 1. A reduction in hours for off licences generally	Most appropriate opening time for supermarket s?	Most appropriate opening time for bottle stores and cellar doors etc?	4. Do you think supermarket s should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	5. Any other comments:	Most appropriate closing time for supermarket s?	Most appropriate closing time for all other off licences?	8. Any other comments:
1	Form	Allen	Scott	Individual	Individual	No	9am	9am	Yes		10pm	10pm	
2	Form	Alex	Kersjes	Individual	Individual	Yes	9am	9am	Yes		9pm	9pm	

3	Form	Parwinder	Nagra	Individual	Individual	Yes	9am	10am	No		10pm	9pm	
4	Form	Balwinder	Sandhu	Licensee	Big Barrel Hastings	Yes	8am	9am	Yes		9pm	9pm	
5	Form	Bruce	Nimon	Licensee	Kokako Farms	Yes	9am	9am	No		9pm	9pm	
6	Form	John	van den Berk	Business	John's Bakery Ltd	No	8am	8am	Yes		10pm	10pm	
7	Form	Daniel	Nelson	Licensee	Haha Wine Company	No	7am	9am	No		10pm	10pm	
8	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club inc.	No	10am	9am	Yes		8pm	10pm	
9	Form	Anita	Gaylard	Licensee	KartSport Hawkes Bay	Yes	10am	10am	Yes	Alcohol should not be sold at supermarkets at all. There are plenty of bottle stores available to purchase from.	8pm	10pm	
10	Form	peter	steers	Licensee	Hawks Bay and East Coast Aero club	Yes	10am	10am	Yes		9pm	9pm	
11	Form	Len and Marie	Mitchell	Individual	individual	Yes	9am	9am	Yes		9pm	9pm	
12	Form	Kim	Parker	Individual	individual	No	7am	10am	No		10pm	10pm	
13	Form	Will	Coltart	Individual	individual	No	7am	7am	Yes		10pm	11pm	
14	Form	Shankar	Gc	Licensee	Gengy's Hastings	Yes	10am	10am	No		10pm	10pm	
15	Form	Grant	Edmonds	Licensee	Redmetal Vineyards	Yes	10am	10am	Yes		9pm	9pm	
16	Form	Kate	Galloway	Licensee	Mobius Wine Ltd	No	7am	7am	Yes		11pm	10pm	
17	Form	Rachelle	Adams	Licensee	Element Vineyard Ltd	No	8am	10am	No		11pm	11pm	
18	Form	James	Ludlam	Licensee	President Kia Toa Bowling Club	No	9am	9am	Yes		11pm	11pm	
19	Form	Kate	Radburnd	Licensee	Radburnd Cellars	No	7am	9am	No		10pm	10pm	
20	Form	Guillaume	Thomas	Licensee	Maison Noire Ltd	Yes	8am	8am	Yes		10pm	10pm	
21	Form	Song	Han	Licensee	clive four square	No	7am	9am	No	The supermarket is the place for customers to buy everything including liquor, it makes much easier for customers to buy everything at the same time, unlike bottle stores which only sell liquor.	9pm	9pm	
22	Form	Greg	Duff	Licensee	Clive Hotel	Yes	10am	10am	Yes		9pm	9pm	
23	Form	Jim	Poppelwell	Individual	individual	No	7am	9am	No		10pm	11pm	
24	Form	Sean	Burns	Licensee	AONZ Fine Wine Estates	Yes	9am	10am	Yes		9pm	9pm	
25	Form	Tash	Stuck	Licensee	Level 1	No	8am	9am	No		10pm	10pm	
26	Form	barbara	abbott	Individual	individual	Yes	10am	10am	No	i do not know the times for supermarket but they should be less than bottle stores	8pm	10pm	

27	Form	Liz	Pollock	Licensee	LIZ POLLOCK & ASSOCIATES LTD	no answer	no answer	no answer	no answer		no answer	no answer	
28	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club	Yes	9am	10am 9am	Yes		9pm	10pm	
29	Form	Daniel	Pistone	Licensee	Sazio	no answer	7am	8am	No		9pm	10pm	
30	Form	Karnak	Heremia	Individual	individual	Yes	9am	9am	Yes		8pm	8pm	
31	Form	Alex	Hedley	Individual	individual	Yes	9am	9am	Yes		8pm	8pm	Consider how this question is framed in your analysis. This could be easily interpreted as the closing time for supermarkets in general, however the intent here is only in relation to alcohol sales. Supermarket can continue to operate as they wish with regard to the sale of general goods.
32	Form	cliff	Fernandes	Licensee	lot 2	Yes	7am	9am	Yes		10pm	10pm	
33	Form	jess	trew	Individual	individual	Yes	9am	9am	Yes	I believe supermarkets should have the same trading hours as all other off-licence outlets to ensure a fair and consistent approach to alcohol harm prevention. Allowing supermarkets to sell alcohol for longer undermines the efforts to reduce alcohol-related harm in our communities. Longer hours increase accessibility and availability.	9pm	9pm	
34	Form	Houkama u	Potae	Individual	individual	Yes	10am	10am	Yes		9pm	9pm	
35	Form	Evelyn	Jirkowsky	Individual	individual	Yes	7am	9am	No		10pm	9pm	
36	Form	Mala	Bishop	Stakeholder	Hastings District Council	Yes	9am	9am	Yes	Longer hours increase the potential for alcohol related harm due to greater availability	9pm	9pm	Longer hours increase the potential for alcohol related harm due to greater availability
37	Form	Trevor	Smith	Licensee	Big Barrel Stores	Yes	9am	9am	Yes		9pm	9pm	
38	Form	Beth	Elstone	Licensee	Littlestone	Yes	9am	9am	Yes		10pm	10pm	
39	Form	Taylor	Bevan	Stakeholder	Hastings Youth Council	Yes	9am	9am	Yes		10pm	10pm	The reason for the support in reduction of opening/closing hours for off-licence establishments is that off-licence drinking is typically less safe than on-licence drinking because it happens without trained staff to monitor consumption, check for underage drinkers, intervene when someone has had too much, or call for help in emergencies. On-licence venues offer a level of control and oversight that helps reduce alcohol-related harm for young people - something off-licence drinking simply can't provide.
40	Form and Substantial	Nathan	Cowie	Stakeholder	Community against Alcohol Harm	yes	10am	10am	yes		9pm	9pm	
41	Form written	jessie	Moir	Individual	individual	yes	10am	10am	yes	For the supermarkets, 10am is the time they can start selling alcohol, not for opening the supermarket.	8pm	8pm	as above, closing time for alcohol, but supermarket can still be open
42	Form written	Hayley	Hansen	Individual	individual	yes	7am	7am	no		11pm	11pm	

43	Form written and substantial	Rachael	Gresham	Individual	individual	no answer	no answer	no answer	no answer		9pm	9pm	
44	email substantial	Brent	Eccles	Individual	individual	no answer	no answer	no answer	no answer		no answer	no answer	
45	substantial	Kristine	Larner	Stakeholder	Hawkes Bay Tourism Industry Association	no answer	no answer	no answer	no answer		no answer	no answer	
46	substantial	Hamish	Saxton	Stakeholder	Hawkes Bay Tourism	no answer	no answer	no answer	no answer		no answer	no answer	
47	substantial	Ashleigh	Rhodes	Licensee	Foodstuffs North island	no	7am	no answer	no answer	Foodstuffs works hard to ensure that it, and every one of its members' licensed stores, is a responsible seller of alcohol. As a business, we ensure our stores understand fully their obligations and wider responsibilities under the Sale and Supply of Alcohol Act 2012 (Act) and its regulations. Under the Act, our members' supermarkets and grocery stores are limited in the kinds of alcohol product they are able to sell...Also under the Act, our stores are required to adhere to many other conditions.... The previous LAP expressly recognises that, unlike for bottle shops and the other types of off-licensed premises, the sale of alcohol is not the main business of grocery stores and supermarkets. Their main business is the sale of food and general groceries.. permitting a 7am opening time allows customers to carry out their regular grocery shopping in the morning. For a number of customers this is not just a matter of convenience, it is because of work or childcare and other family commitments. Consequently, from Monday to Friday all of our Hastings District grocery stores and supermarkets <i>open</i> at 7am in the morning. On weekends, our Four Square stores open between 7am and 8am and our PAK'nSAVE and New World stores open at 7am. These opening hours reflect customers' shopping needs.... In relation to the proposal for a 9am maximum opening time, the Issues and Options paper does not provide any supporting evidence from the Hastings District or even the wider Hawke's Bay. The academic opinion referred to is, when read correctly, largely related to the effect of <i>on</i> -licence trading hours. This makes sense, since on-licence alcohol can only be consumed when the bar, club, tavern or restaurant is trading. By contrast, alcohol purchased from	10pm (9.15pm earliest)	no answer	At the other end of the day, there are customers who value the option to do their family shopping quite late. Again, this is often not just a matter of convenience or because they like to shop when the store is quieter. As a result, PAK'nSAVE Hastings, New World Havelock North and New World Hastings have <i>closing</i> times of 9pm. Our other off-licensed stores close between 7pm and 8pm. Sometimes our customers are still completing their purchases at closing time, so that the store in fact finishes processing transactions and shuts a little later. That can therefore be shortly <i>after</i> 9pm in the supermarkets. We consider that the maximum off-licence trading hours for supermarkets and grocery stores under the current JLAP should be retained. It is clear that our stores have been able to sell alcohol safely and responsibly during those hours. And we have not seen any evidence that our stores being open before 9am or sometimes until a little after 9pm is the cause of any alcohol-related harm as defined in the Act (being harm caused by the <i>excessive or inappropriate consumption</i> of alcohol)... Although there is no longer a right of appeal against elements of a LAP, they are still required to comply with the law. In particular, as part of the system of control over the sale and supply of alcohol, elements of a LAP must be <i>reasonable</i> , in accordance with the express purpose of the Act stated in section 3. The courts have confirmed that, to be reasonable, a proposed restriction must be proportionate.... We propose that, at a minimum, the latest time for alcohol sales from supermarkets and grocery stores should be at least 9:15pm, to allow those customers who are in the process of finishing and paying for their groceries to lawfully do so....

										off-licensed premises can be consumed at any time later. So, while reductions in off-licensed trading hours will certainly inconvenience or prejudice responsible shoppers, they cannot stop irresponsible drinkers consuming alcohol inappropriately or to excess...			
48	substantial	Nina	Dally	Licensee	Woolworths NZ	no	7am	no answer	no answer	Opposes Policy 3.2 of the DLAP to reduce maximum off-licence trading hours for off-licences to Monday to Sunday from 9am to 9pm. GDL does not consider Hastings District Council has provided sufficient evidence to justify this restriction. GDL seeks the off-licence hours in the current Local Alcohol Policy ("LAP") of 7am to 10pm be retained for supermarkets and grocery stores....GDL holds one off-licence in the Hastings District for Woolworths Hastings. The current opening hours and trading hours are Monday to Sunday from 7am to 10pm... The proposed reduction in trading hours will impact GDL's operations by reducing trading hours at Woolworths Hastings by three hours per day. GDL is concerned this will cause disruption and inconvenience to customers carrying out their shopping, including shift workers who may carry out their shopping both early in the morning and later at night. The Supreme Court has acknowledged shopper convenience may be material to the assessment of whether a restriction in a LAP is unreasonable considering the object of the Act....GDL does not consider the proposed reduction in trading hours for supermarkets and grocery stores is sufficiently supported by evidence... GDL also considers the evidence cited by Council does not justify a later opening time (from 9am) as proposed under the DLAP. In both studies cited by Council, there is no indication of an increase in alcohol-related incidences in the mornings, rather, this is when alcohol-related incidences are at their lowest (on average) during a 24-hour period.	10pm	no answer	
49	substantial	Marisa Bidois		Stakeholder	Restaurants Association	no answer	no answer	no answer	no answer		no answer	no answer	
50	substantial	Kim	Thorp	Licensee	Blackbarn	no answer	no answer	no answer	no answer		no answer	no answer	
51	substantial	Hamish	Gordon	Licensee	Shed 530	no answer	no answer	no answer	no answer		no answer	no answer	
52	substantial	Carl	Woodman	Licensee	Shed 530	no answer	no answer	no answer	no answer		no answer	no answer	
53	substantial	Kel	Dixon	Licensee	Shed 530	no answer	no answer	no answer	no answer		no answer	no answer	

54	substantial	Shane	Phillips	Stakeholder	Hospitality Association NZ	no answer	no answer	no answer	no answer		no answer	no answer	
55	proforma	Aaron	Mills	Business	Havelock North Motor Lodge	no answer	no answer	no answer	no answer		no answer	no answer	
56	substantial	Jennifer	Lamm	Stakeholder	Alcohol Healthwatch	yes	9am	9am	yes	This reality is reflected in the current trend for councils to reduce trading hours in their LAPs, particularly for off-licences. As the vast majority of alcohol is purchased from off-licences (over 80%) and often cheaply, we strongly support the decrease in trading hours proposed in the draft LAP. We support the proposed off-licence trading hours of 9am to 9pm and note that this reflects the current trend in LAPs across NZ and would help reduce the opportunity of hazardous drinking and "pre loading", "side-loading" and "post loading" and consequently lessen the incidence of other harms (assault, unintentional injury, drink driving) associated with extended trading hours. A recent study has also estimated that implementing stricter limits on off-licence trading hours and density could decrease overall alcohol consumption in Aotearoa New Zealand by 17.9% resulting in a gain of 450,000 health-adjusted life years (HALYs) over the lifetime of the 2018 population.	9pm	9pm	
57	substantial	Matt	Radford	Stakeholder	Health NZ	yes	9am	9am	yes	There is a large potential benefit to this proposal: approximately 80% of alcohol consumption occurs from off-licence premises. The evidence above shows alcohol-related harm is greatest in the evening. International studies have provided evidence of the association between reduced trading hours and reduced harm. International studies found that implementing restrictions in off-licence trading hours was associated with lower consumption of alcohol and a significant reduction in hospital admissions for alcohol-related intoxication, especially in young people. The community survey also showed 54% of respondents wanted shorter hours for supermarket alcohol sales. The proposed reduced hours are in keeping with other TLAs in Hawke's Bay. (Wairoa: maximum trading hours for off-licences 10am to 9pm, Central Hawke's Bay: 9am to 11pm for off-licences) A reduction in trading hours may help to support the one in four people who drink hazardously in Hawke's Bay. Restricting alcohol sales to shorter hours than	8pm - 9pm	8pm-9pm	Health NZ supports a reduction in trading hours to 9pm. Health NZ also encourages Council to consider reducing the closing time further to 8pm. The evidence mentioned under on-licences in section 1 shows alcohol-related harm is greatest in the evening. The Supreme Court ruling in 2023 on Auckland Council's Provisional LAP showed that a 9pm closing time (for off-licence premises) was not unreasonable in light of the Object of the Act and likely to reduce alcohol-related harm. New evidence suggests that further reducing the opening hours for all off-licence premises from 9am to 8pm would further mitigate the risk of alcohol-related harm for Hastings communities. As mentioned above with regard to opening hours, limiting alcohol sales to shorter hours than general supermarket trading times reduces the likelihood of shoppers encountering alcohol while doing their regular grocery shopping. This may help to support the one in four people who drink hazardously in Hawke's Bay.

										general supermarket trading times allows people to shop for groceries without being exposed to alcohol. People trying to reduce their alcohol consumption can shop at a time when they know they will not be tempted to purchase alcohol. Similar initiatives have been done with 'quiet hours' to support people who are neurodivergent. Ninety percent of beer and wine purchases in Hastings are from supermarkets and grocery stores. It is important that supermarkets and grocery stores are treated the same as other off-licences. New Zealand analysis of the relationship between alcohol outlets and harm shows no evidence of a substantive difference in alcohol-related harm between alcohol sales from supermarkets when compared to other off-licence premises. Respondents in the community survey ranked supermarkets second (51%) following bottle stores (65%) for the type of alcohol outlet perceived to cause the most harm (multiple responses allowed).			
58	substantial	Michael	Swan	Licensee	Liquid Events	no answer	no answer	no answer	no answer		no answer	no answer	
59	written form	Kowhai	Kahika	Individual	individual	yes	7am	no answer	no answer		no answer	no answer	
60	substantial	Reuben		Licensee	Madcap Music	no answer	no answer	no answer	no answer		no answer	no answer	
61	pro forma	Reuben	Vergis	Licensee	Outfield Festival	no answer	no answer	no answer	no answer		no answer	no answer	
62	substantial	Ray	Wylie	Stakeholder	NZ Police	yes	9am	9am	yes	There is strong international and domestic evidence that supports the proposition that the longer licensed premises are open, the more alcohol related harm that can be attributed to them. Police believe that off licences contribute to alcohol related harm by among other things facilitating pre and side loading. Reducing the hours of trading for off licenses will reduce the availability of alcohol and consequent alcohol related harm associated with pre and side loading. Reduction in hours of sale for both on and off licensed premises are associated with reduced alcohol harm. As well as this rates of violence in and around entertainment precincts are clearly affected by changes to trading hours late at night.	9pm	9pm	

CLUB LICENCE AND SPECIAL LICENCE HOURS

entry sub #	Type	Name	Last	Submission category	Representing organisation or business	Agree/ Disagree: reduction in hours for smaller club licenses (from 1am to 12am midnight)?	Most appropriate closing time:	3. Any other comments:	1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	2. Any other comments
1	Form	Allen	Scott	Individual	Individual	No	1am		No	
2	Form	Alex	Kersjes	Individual	Individual	No	2am		No	
3	Form	Parwinder	Nagra	Individual	Individual	No	2am		No	
4	Form	Balwinder	Sandhu	Licensee	Big Barrel Hastings	no answer	no answer		no answer	
5	Form	Bruce	Nimon	Licensee	Kokako Farms	Yes	12am midnight		No	
6	Form	John	van den Berk	Business	John's Bakery Ltd	No	12am midnight		No	
7	Form	Daniel	Nelson	Licensee	Haha Wine Company	No	12am midnight		Yes	
8	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club inc.	No	1am	What about new years eve. Plus special occasions. We would probably use the 1am closing maybe twice a year. As we are a small club. But it is always nice for that extra hour if needed.	Yes	
9	Form	Anita	Gaylard	Licensee	KartSport Hawkes Bay	No	1am		Yes	these should be considered on a case-by-case basis
10	Form	peter	steers	Licensee	Hawks Bay and East Coast Aero club	Yes	12am midnight		Yes	
11	Form	Len and Marie	Mitchell	Individual	individual	Yes	12am midnight		Yes	
12	Form	Kim	Parker	Individual	individual	No	2am		No	
13	Form	Will	Coltart	Individual	individual	Yes	12am midnight		No	
14	Form	Shankar	Gc	Licensee	Gengy's Hastings	Yes	12am midnight		Yes	
15	Form	Grant	Edmonds	Licensee	Redmetal Vineyards	Yes	12am midnight		No	
16	Form	Kate	Galloway	Licensee	Mobius Wine Ltd	No	2am		No	
17	Form	Rachelle	Adams	Licensee	Element Vineyard Ltd	Yes	12am midnight		Yes	
18	Form	James	Ludlam	Licensee	President Kia Toa Bowling Club	Yes	12am midnight		No	
19	Form	Kate	RADBURN	Licensee	Radburn Cellars	No	1am		Yes	Set appropriately for the particular activity
20	Form	Guillaume	Thomas	Licensee	Maison Noire Ltd	No	1am		Yes	
21	Form	Song	Han	Licensee	clive four square	Yes	10pm		No	
22	Form	Greg	Duff	Licensee	Clive Hotel	Yes	12am midnight		Yes	
23	Form	Jim	Poppelwell	Individual	individual	No	1am		No	
24	Form	Sean	Burns	Licensee	AONZ Fine Wine Estates	Yes	12am midnight		No	
25	Form	Tash	Stuck	Licensee	Level 1	No	1am		No	
26	Form	barbara	abbott	Individual	individual	Yes	12am midnight		Yes	
27	Form	Liz	Pollock	Licensee	LIZ POLLOCK & ASSOCIATES LTD	no answer	no answer		No	
28	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club	Yes	no answer		Yes	
29	Form	Daniel	Pistone	Licensee	Sazio	no answer	no answer		Yes	
30	Form	Karnak	Heremia	Individual	individual	Yes	12am midnight		Yes	
31	Form	Alex	Hedley	Individual	individual	Yes	12am midnight		Yes	
32	Form	cliff	Fernandes	Licensee	lot 2	Yes	12am midnight		Yes	

33	Form	jess	trew	Individual	individual	Yes	12am midnight	I support a reduction in hours for club licences because it can play a key role in reducing alcohol-related harm, particularly late at night when the risk of incidents like violence, disorder, and accidents is higher. Shortening club hours encourages more responsible drinking habits and helps protect both club members and the wider community. It also supports emergency services and healthcare providers by lessening the strain during peak hours.	Yes	I think it's important that opening and closing times are set in the LAP for special licences to help manage alcohol-related harm at events. Having clear time limits provides consistency, sets expectations for event organisers, and supports responsible alcohol use. It also gives local authorities better control over late-night events where the risk of harm is higher. Setting reasonable hours helps protect public safety, reduces the potential for disorder, and ensures events remain enjoyable and safe for everyone involved.
34	Form	Houkamau	Potae	Individual	individual	Yes	12am midnight		Yes	
35	Form	Evelyn	Jirkowsky	Individual	individual	Yes	12am midnight		Yes	
36	Form	Mala	Bishop	Stakeholder	Hastings District Council	Yes	12am midnight	Longer hours increase the potential for alcohol related harm due to greater availability	Yes	This provision is guidance and there is flexibility in discretion from the DLC for the odd event that may go beyond those hours.
37	Form	Trevor	Smith	Licensee	Big Barrel Stores	no answer	no answer		no answer	
38	Form	Beth	Elstone	Licensee	Littlestone	Yes	12am midnight		Yes	
39	Form	Taylor	Bevan	Stakeholder	Hastings Youth Council	no answer	no answer		no answer	
40	Form and Substantial	Nathan	Cowie	Stakeholder	Community against Alcohol Harm	yes	12am midnight		yes	
41	Form written	jessie	Moir	Individual	individual	no	9pm		no answer	
42	Form written	Hayley	Hansen	Individual	individual	yes	12am midnight		no	
43	Form written and substantial	Rachael	Gresham	Individual	individual	no answer	no answer		no answer	
44	email substantial	Brent	Eccles	Individual	individual	no answer	no answer		no	
45	substantial	Kristine	Larner	Stakeholder	Hawkes Bay Tourism Industry Association	no answer	no answer		no answer	
46	substantial	Hamish	Saxton	Stakeholder	Hawkes Bay Tourism	no answer	no answer		no answer	
47	substantial	Ashleigh	Rhodes	Licensee	Foodstuffs North island	no answer	no answer		no answer	
48	substantial	Nina	Dally	Licensee	Woolworths NZ	no answer	no answer		no answer	
49	substantial	Marisa Bidois		Stakeholder	Restaurants Association	no answer	no answer		no answer	
50	substantial	Kim	Thorp	Licensee	Blackbarn	no answer	no answer		no answer	
51	substantial	hamish	Gordon	Licensee	Shed 530	no answer	no answer		no answer	
52	substantial	Carl	Woodman	Licensee	Shed 530	no answer	no answer		no answer	
53	substantial	Kel	Dixon	Licensee	shed 530	no answer	no answer		no answer	
54	substantial	Shane	Phillips	Stakeholder	Hospitality Association NZ	no answer	no answer		no answer	
55	proforma	Aaron	Mills	Bussiness	Havelock North Motor Lodge	no answer	no answer		no answer	
56	substantial	Jennifer	Lamm	Stakeholder	Alcohol Healthwatch	yes	12am midnight		no answer	no answer
57	substantial	Matt	Radford	Stakeholder	Health NZ	yes	12am midnight	Yes. Health NZ supports a reduction in hours for the reasons stated previously about reducing alcohol-related harm.	yes	Yes. Health NZ supports setting opening and closing times for special licences. Like any other licence type, there is potential to increase alcohol-related harm without appropriate restrictions. The effects of hours of access on alcohol-related harms applies to special licences too. Very occasionally events may occur outside of standard special licence hours, for example Rugby World Cups. Examples like this have been addressed by amending national legislation. ³⁰
58	substantial	Michael	Swan	Licensee	Liquid Events	no answer	no answer		no answer	
59	written form	Kowhai	Kahika	Individual	individual	no answer	no answer		no answer	
60	substantial	Reuben		Licensee	Madcap Music	no answer	no answer		no answer	

61	pro forma	Reuben	Vergis	Licensee	Outfield Festival	no answer	no answer		no answer	
62	substantial	Ray	Wylie	Stakeholder	NZ Police	no answer	no answer		no answer	

DISCRETIONARY CONDITIONS

entry sub #	Type	Name	Last	Submission category	Representing organisation or business	1. Do you agree with the discretionary conditions generally?	2. Any other comments
1	Form	Allen	Scott	Individual	Individual	Yes	As long as they are left as they are
2	Form	Alex	Kersjes	Individual	Individual	No	
3	Form	Parwinder	Nagra	Individual	Individual	No	
4	Form	Balwinder	Sandhu	Licensee	Big Barrel Hastings	no answer	
5	Form	Bruce	Nimon	Licensee	Kokako Farms	Yes	
6	Form	John	van den Berk	Business	John's Bakery Ltd	Yes	
7	Form	Daniel	Nelson	Licensee	Haha Wine Company	Yes	
8	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club inc.	Yes	
9	Form	Anita	Gaylard	Licensee	KartSport Hawkes Bay	Yes	
10	Form	peter	steers	Licensee	Hawks Bay and East Coast Aero club	Yes	
11	Form	Len and Marie	Mitchell	Individual	individual	Yes	
12	Form	Kim	Parker	Individual	individual	No	
13	Form	Will	Coltart	Individual	individual	No	There are already adequate discretionary conditions. The event's space is already very difficult to operate in, further restrictions will stifle events in the region.
14	Form	Shankar	Gc	Licensee	Gengy's Hastings	Yes	
15	Form	Grant	Edmonds	Licensee	Redmetal Vineyards	Yes	
16	Form	Kate	Galloway	Licensee	Mobius Wine Ltd	Yes	
17	Form	Rachelle	Adams	Licensee	Element Vineyard Ltd	Yes	
18	Form	James	Ludlam	Licensee	President Kia Toa Bowling Club	Yes	
19	Form	Kate	RADBURN	Licensee	Radburn Cellars	Yes	
20	Form	Guillaume	Thomas	Licensee	Maison Noire Ltd	Yes	
21	Form	Song	Han	Licensee	clive four square	Yes	
22	Form	Greg	Duff	Licensee	Clive Hotel	Yes	
23	Form	Jim	Poppelwell	Individual	individual	No	It is difficult to comment without more detail being provided about how these will be enforced. But when it comes to special licence conditions, consideration should be given to the patron experience. If I attend a concert with friends I do not want to spend most of the time in a queue just to get a single drink. It is common practice for members of a group to take turns queuing so as to maximise the amount of time hanging out and enjoying the entertainment. Starting with two serves per person reducing to one is dogmatic and inflexible. Flexibility is key to good crowd management, preset rules that do not take the situation at the time into account are restrictive and can have unintended negative outcomes. Looking at other LAP proposals around the country it appears Hastings is an outlier in this instance, and therefore there is a danger that the district will gain a reputation for poor event experiences, which could have severe consequences for the local industry, particularly larger concert venues such as Black Barn and Tomoana Showgrounds.
24	Form	Sean	Burns	Licensee	AONZ Fine Wine Estates	Yes	
25	Form	Tash	Stuck	Licensee	Level 1	No	
26	Form	barbara	abbott	Individual	individual	No	
27	Form	Liz	Pollock	Licensee	LIZ POLLOCK & ASSOCIATES LTD	No	I disagree with the proposed changes to the serve reduction systems going from maximum serves of 2 per sale reducing to 1. I believe that this should be left to the discretion of the Duty Manager / License holder.
28	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club	Yes	
29	Form	Daniel	Pistone	Licensee	Sazio	no answer	
30	Form	Karnak	Heremia	Individual	individual	Yes	
31	Form	Alex	Hedley	Individual	individual	Yes	
32	Form	cliff	Fernandes	Licensee	lot 2	Yes	
33	Form	jess	trew	Individual	individual	Yes	
34	Form	Houkamau	Potae	Individual	individual	Yes	There could be more measures to support those who choose not to drink, clearly sectioned off areas for non-alcoholic areas and minors.
35	Form	Evelyn	Jirkowsky	Individual	individual	Yes	
36	Form	Mala	Bishop	Stakeholder	Hastings District Council	Yes	Currently the DLC has the ability to impose discretionary conditions and these provisions reinforce this. They are used on a case-by-case basis based on risk.
37	Form	Trevor	Smith	Licensee	Big Barrel Stores	Yes	We believe the 'No single sale of Ready to Drink (RTD) or mainstream beer under 500ml' should be 'No single sale of Ready to Drink (RTD) or mainstream beer 500ml or under' (excluding Craft Beer). This would keep it consistent with other councils in NZ and makes it easier for Off Premise stores to implement as it is then clear and includes 500ml Strong beers. Also, please define 'Mainstream Beers', what is Mainstream from the Councils perspective? This is unclear and can be interpreted in different ways by Off Licence holders so stores can apply this in different ways.

38	Form	Beth	Elstone	Licensee	Littlestone	No	I think with Special licensing that each application should be considered in its own merit. Not every event, or target audience is the same, and imposing blanket discretionary measures could have the potential to be mis-interpreted depending on who is reviewing the applications. Limiting alcohol percentages creates a barrier and the ability to activate various brands or experiences within the event environment with the right audience. I believe that with the correct AMP in place these higher alcohol content products can be managed, so applying a blanket % limit would be more red tape when creating events where a cocktail or spirit ranging is the focus (Gin festivals, etc). Limiting special licenses to begin at a serve limit of 2 drinks and scaling back to 1 is unrealistic within large scale events operationally at the beginning of the day. It also creates a tendency of angst and frustration with the patrons, leading to other types of disturbances. Whilst this may be appropriate for some high-risk audiences, there are many audiences where a 4 serve limit to begin with is very manageable under a good AMP with good duty managers and security planning in and around the event. I believe that the licensee managing the license should be able to make the decision on when its appropriate to scale back serves in discussion with the various agencies who attend the events and alcohol meetings. In a nutshell, good event operators go over and above in terms of risk mitigation with alcohol harm, and I believe the applications should be assessed based on the merit and history of the applicant managing special license, the audience risk profile, and the alcohol management plan. A one size fits all approach will become a deterrent to events being hosted within an area that applies too much red tape to good event operators.
39	Form	Taylor	Bevan	Stakeholder	Hastings Youth Council	no answer	
40	Form and Substantial	Nathan	Cowie	Stakeholder	Community against Alcohol Harm	yes	Support discretionary conditions with improvements. Back single sales restrictions, especially for high-strength beers; propose clearer wording based on container size, alcohol content, and price. Recommend stronger limits on liquor store external advertising, covering branding, colours, lifestyle imagery, and signage to better protect community spaces. Include FASD pregnancy warning signage A4 size.
41	Form written	jessie	Moir	Individual	individual	no answer	
42	Form written	Hayley	Hansen	Individual	individual	yes	
43	Form written and substantial	Rachael	Gresham	Individual	individual	no answer	
44	email substantial	Brent	Eccles	Individual	individual	no answer	Well this would do it for me. No more concerts coming to Hastings. Why would I put myself through this? Special Licences have gotten right out of control. With the Tri-agencies not seemly having to report to no-one, these rules are being made with consultation. I dont believe you can make rules this severe when it comes to kiwis. What ever happened to personal responsibility? Do you believe Kiwis should not be able to buy drinks for their mates? You are making this sound like alcohol is bad for you and naughty and maybe illegal. If you do, say so. See how that goes with the voters of Aotearoa. I believe you are wrong and there is a massive double standard going on here. You have an "Alcohol Harm" group. Do you also have an "Alcohol Good" group? I believe that this proposal should be bought into the public arena and I will do that if it gains traction. I really hope common sense prevails and energy can be better spend on other issues in our society
45	substantial	Kristine	Larner	Stakeholder	Hawkes Bay Tourism Industry Association	no answer	The proposed changes around serve reduction systems will have a detrimental impact on the events industry in Hawke's Bay. Events such as food and wine festivals, concerts, and other large gatherings are vital to our tourism sector, drawing visitors from across the country. Serve reduction systems could lead to lower satisfaction among event-goers, ultimately impacting on the regions reputation of hosting quality events and reduce the economic benefits that these events bring to our region. Additionally, the implementation of such systems could increase operational costs for event organisers, making it more challenging to host successful events. We specifically disagree with the following proposed changes: 1. Requirement of a separate line or service area for non-alcoholic beverages where the special licence is likely to have patrons that are under the legal drinking age: This requirement could create logistical challenges for event organisers, leading to increased costs and complexity in event planning. 2. Serve reduction systems in place to manage intoxication levels – maximum serves of 2 per sale reducing to 1: This change could significantly impact the visitor experience at events. Limiting the number of serves per sale may lead to frustration among attendees, who come to enjoy the food and wine offerings that Hawke's Bay is known for. It could also result in decreased sales for vendors, negatively affecting the economic benefits of events. We urge the council to consider these factors and work with industry stakeholders to find a balanced approach that supports both public safety and the vitality of our events industry. It is essential to ensure that any policy changes do not hinder the ability of Hawke's Bay to host successful and economically beneficial events.
46	substantial	Hamish	Saxton	Stakeholder	Hawkes Bay Tourism	no answer	
47	substantial	Ashleigh	Rhodes	Licensee	Foodstuffs North island	yes	Foodstuffs is not opposed to guidance being provided by the Council in the DLAP with respect to imposition of discretionary conditions. However, in our view, the guidance should be amended. Discretionary conditions can only be imposed where they are 'reasonable'. The guidance in the DLAP should reflect the correct legal position as to what is reasonable in the context of the Act, as stated by the High Court. ¹ In particular, 'the requirement of reasonableness invokes concepts of proportionality. There must be a sufficient connection between the condition the relevant body wishes to impose and the risk it seeks to guard against.' ² And the costs and effects on responsible sellers and customers must not outweigh any likely benefit from a proposed condition. It is therefore not correct for the guidance to suggest, as it does currently, that the requirement of reasonableness is simply 'whether it is within the capabilities of the applicant or licensee to satisfy this condition'.... We do not consider that the DLAP should suggest a discretionary condition prohibiting aisle end displays of alcohol. That would wrongly give the impression that such displays are somehow inherently objectionable. This view has been rejected by the High Court... From their knowledge of their customers, our stores consider that proposing a discretionary condition prohibiting the sale of single units of mainstream beer with a volume of less than 500ml would be unreasonable. This would remove one valuable option for customers who are looking to manage their alcohol spending or consumption... Our stores are happy to continue to maintain incidents registers. However, in the legal proceedings over Auckland Council's LAP, the High Court determined that the Act did not permit a council to impose a policy which specifies the information to be provided by the applicant in the process of making a licence application... The DLAP includes a discretionary condition which requires 'impact assessments by an applicant if a premises is in a particularly low socio-economic area or an area known to have issues.' It is not clear what is intended by this. The wording is ambiguous and likely to lead to unnecessary confusion and therefore its inclusion in the LAP would not be supported.

48	substantial	Nina	Dally	Licensee	Woolworths NZ	no answer	GDL acknowledges Policy 5.0 refers to section 117 of the Act and seeks to provide guidance regarding how Discretionary conditions are to be imposed under the Act. However, GDL considers the guidance on the imposition of these discretionary conditions needs to be expanded to align with the legal test for how discretionary conditions under section 117 of the Act are applied, as well as the relevant case law. Whether a discretionary condition meets section 117 is a fact-specific assessment to be weighed against considerations relevant to the application at hand.8 Reasonableness depends on an objective assessment of whether there is a rational and proportionate connection between an identified risk to be abated or benefit to be sought when weighed against all the relevant considerations... One of the proposed discretionary conditions in Policy 5.0 states "no single sales of RTDs or mainstream beer under 500ml". GDL has not stocked single cans of high-strength mainstream beer in any of its Woolworths stores since October 202310 and is not permitted to sell RTDs or shots. This exemplifies the challenges of including pre-drafted discretionary conditions in a DLAP and the risk of such conditions being imposed as a matter of course in a way that is not reflective of the particular application. Similarly, a condition in the DLAP that there are to be "no end of aisle sales of alcohol for supermarkets and grocery stores" appears to adopt a policy position against ends of aisles (which the Council will be aware is impermissible)....
49	substantial	Marisa Bidois		Stakeholder	Restaurants Association	no answer	Ensure conditions are tailored to the licence type and category.
50	substantial	Kim	Thorp	Licensee	Blackbarn	no	Concerns with special licence discretionary conditions - mostly already complied with within events. Main issue with reduction of serves - not wanting it to be a blanket policy.
51	substantial	hamish	Gordon	Licensee	Shed 530	no	Issues with discretionary conditions for special licences; drink restrictions, drink containers, cost, challenges, logistics, negative audience experience. One way door policy may discourage people from entering events early. Non alcohol service areas are impractical and inefficient. Tailored conditions by licence type. Requiring 25 working days for processing reduces flexibility.
52	substantial	Carl	Woodman	Licensee	Shed 530	no	Issues with discretionary conditions for special licences; drink restrictions, drink containers, cost, challenges, logistics, negative audience experience. One way door policy may discourage people from entering events early. Non alcohol service areas are impractical and inefficient. Tailored conditions by licence type. Requiring 25 working days for processing reduces flexibility.
53	substantial	Kel	Dixon	Licensee	shed 530	no	Issues with discretionary conditions for special licences; drink restrictions, drink containers, cost, challenges, logistics, negative audience experience. One way door policy may discourage people from entering events early. Non alcohol service areas are impractical and inefficient. Tailored conditions by licence type. Requiring 25 working days for processing reduces flexibility.
54	substantial	Shane	Phillips	Stakeholder	Hospitality Association NZ	no	Use of outdoor areas after a certain time - We do not support the inclusion of this provision – outdoor dining areas are a drawcard for venues who have them, and contribute to vibrancy. They add to the security and safety of patrons. Restricting such areas would force people out onto the street or outside the controlled licensed premise for vaping or cigarettes. b. No serving in glass containers at specified times – This can create confusion and costs for venues. It also limits the purchase of wine, and low-or no-alcohol bottled products. Sustainability practises here would be questionable. c. One-way door restrictions – We do not believe a one-way door policy is an effective tool for alcohol harm minimisation, and can present safety issues separating groups and resulting in congregating of crowds outside closing venues rather than natural dispersion. Serve reduction systems - We believe a well-managed event can maintain a responsible service of alcohol without requiring attendees to queue for longer periods of time causing frustration and having a negative effect on the experience of those attending. Provision of additional security (staff) after specified times – Such a provision will cause many unnecessary costs to businesses. Patron number to security personnel ratio will also have the same effect. Provision of transport for patrons – Transport options are already clearly displayed as part of the licensing requirements.
55	proforma	Aaron	Mills	Bussiness	Havelock North Motor Lodge	no	Use of outdoor areas after a certain time - We do not support the inclusion of this provision – outdoor dining areas are a drawcard for venues who have them, and contribute to vibrancy. They add to the security and safety of patrons. Restricting such areas would force people out onto the street or outside the controlled licensed premise for vaping or cigarettes. b. No serving in glass containers at specified times – This can create confusion and costs for venues. It also limits the purchase of wine, and low-or no-alcohol bottled products. Sustainability practises here would be questionable. c. One-way door restrictions – We do not believe a one-way door policy is an effective tool for alcohol harm minimisation, and can present safety issues separating groups and resulting in congregating of crowds outside closing venues rather than natural dispersion. Serve reduction systems - We believe a well-managed event can maintain a responsible service of alcohol without requiring attendees to queue for longer periods of time causing frustration and having a negative effect on the experience of those attending. e. Provision of additional security (staff) after specified times – Such a provision will cause many unnecessary costs to businesses. Patron number to security personnel ratio will also have the same effect. f. Provision of transport for patrons – Transport options are already clearly displayed as part of the licensing requirements.
56	substantial	Jennifer	Lamm	Stakeholder	Alcohol Healthwatch	yes	Support CPTED, and host responsibility provisions, impact assessments, single sales, signage. Also support end of Aisles - increase sales by as much as 23 to 43 percent and would have a significant impact on alcohol consumption. Council should also include Buy now Pay later restrictions - as these schemes are considered an inappropriate method of payment as it increases its perceived affordability, which can lead to greater consumption. Include a requirement for mandatory age checks on purchase and delivery, particularly with the increasing availability of remote sales/delivery. For example, research conducted by Alcohol Healthwatch in Tamaki Makaurau-Auckland showed that in 73% of alcohol orders did not request age verification on delivery, 49% of alcohol orders were left unattended (contactless) at the door, and 87.5% of delivery companies broke their own restricted items policy. (c) restrictions on the marketing and promotion of non-alcoholic products that pose a high risk of alcohol-related harm, such as drinking games and risky items that encourage dangerous drinking (eg beer pong cups); (d) requirement to have FASD (Fetal Alcohol Spectrum Disorder) warning signage within the alcohol area in supermarkets and grocery stores and at point of sale at bottle stores; and (e) Prohibiting special licences for events focused on children and young people under 18 years to limit their exposure to alcohol.
57	substantial	Matt	Radford	Stakeholder	Health NZ	yes	Having a certified manager onsite after 9pm and all nominated responsible persons having completed Serve Wise training shows strong evidence of a reduction in alcohol-related harm related to effective workforce training. 1. Restricting the use of Buy Now Pay Later options. These can encourage impulse spending and increase alcohol accessibility. The Waikato LAP includes as a discretionary condition the consideration of "Whether 'buy now pay later' is an inappropriate method of payment for the sale and supply of alcohol purchased either remotely or on premises." Given the length of a LAP is up to six years, it is important to consider future challenges. Restrictions on alcohol advertising. Prohibiting or greatly limiting (<25% of the façade) the display of alcohol-related marketing or signage (sandwich boards, bollards, sleeves etc.) on public footpaths outside or within the

							immediate vicinity of licensed premises. There is a causal relationship between youth alcohol initiation and heavy drinking and exposure to alcohol marketing. National evidence shows that alcohol marketing is widespread in urban areas, with Māori and Pacific children disproportionately exposed. Advertising restrictions are a common condition in many LAPs. Central Hawke's Bay has a discretionary condition for bottle stores of no external advertising signs/sandwich boards on outside footpaths. Introducing tighter restrictions on remote sellers and on-demand alcohol delivery: a. Rigorous background checks and mandatory compliance audits, particularly for businesses with a history of violations. b. Mandatory age verification for all customers who appear under 25 at both the point of purchase and upon delivery. c. Two-hour delay before delivery to improve safety - stronger oversight of remote sellers and on-demand alcohol delivery could help prevent underage access and ensure responsible alcohol distribution across Hastings. Research shows that easing access to online sales leads to increased hazardous drinking and the potential for illegal sales to occur. In Australia, access to on-demand alcohol delivery increased the number of people who continue drinking at home when they normally would have stopped.
58	substantial	Michael	Swan	Licensee	Liquid Events	no	I am writing to strongly object to the proposed restrictions that would apply to special license applications in Hastings, namely: • Limiting the type of drinks sold/ Restricting the alcohol percentage of drinks/ Restricting the type of containers used / And introducing serve reduction systems that cap alcohol sales at 2 drinks per transaction, reducing to 1 drink later in the event. Stressed the importance of looking at conditions in a case by case basis. It could otherwise have operational impact and hinder customer experience.
59	written form	Kowhai	Kahika	Individual	individual	no answer	
60	substantial	Reuben		Licensee	Madcap Music	no	Concerns with drink reduction system, may affect audience experience, financial viability. Concerns with security to patron ratios - operational costs. Our events already implement comprehensive Alcohol Management and Harm Reduction Plans including drink serve limits, designated security and medical teams, ID checks, and alcohol-free family zones. Abrupt or excessive restrictions on drink limits could lead to unintended consequences such as higher pre-loading, increased crowd frustration, and negative public perception, ultimately compromising the calm, family-friendly environment we've carefully built over the years. Restricting service flexibility undermines our ability to manage licensed areas safely and efficiently, as our current controls are risk-based, dynamic, and tailored to different times of day and crowd behaviour. We respectfully recommend: A tiered, risk-based licensing approach that recognises event size, audience profile, historical safety records, and proven management capability. Retain the current 4-to-2 drink serve limits for Class One events with demonstrated harm reduction strategies in place. Allow for flexibility in discretionary conditions based on proven risk management, rather than blanket conditions for all events. Continue to engage with experienced event organisers in shaping workable, evidence-based alcohol policies that support both public safety and sustainable event delivery.
61	pro forma	Reuben	Vergis	Licensee	Outfield Festival	no	Concerns with drink reduction system, may affect audience experience, financial viability. Concerns with security to patron ratios - operational costs. Our events already implement comprehensive Alcohol Management and Harm Reduction Plans including drink serve limits, designated security and medical teams, ID checks, and alcohol-free family zones. Abrupt or excessive restrictions on drink limits could lead to unintended consequences such as higher pre-loading, increased crowd frustration, and negative public perception, ultimately compromising the calm, family-friendly environment we've carefully built over the years. Restricting service flexibility undermines our ability to manage licensed areas safely and efficiently, as our current controls are risk-based, dynamic, and tailored to different times of day and crowd behaviour. We respectfully recommend: A tiered, risk-based licensing approach that recognises event size, audience profile, historical safety records, and proven management capability. Retain the current 4-to-2 drink serve limits for Class One events with demonstrated harm reduction strategies in place. Allow for flexibility in discretionary conditions based on proven risk management, rather than blanket conditions for all events. Continue to engage with experienced event organisers in shaping workable, evidence-based alcohol policies that support both public safety and sustainable event delivery.
62	substantial	Ray	Wylie	Stakeholder	NZ Police	yes	Police believe a menu of discretionary conditions together with guidelines for their use, should also be available to licensing authorities as part of the Local Alcohol Policy. A priority discretionary condition for off licences is "no single serve sales to be sold for less than \$6 (amount to be revised for inflation at renewal)". This is particularly for premises in high deprivation areas, communities with high proportions of younger people (under 25 years olds), and within Māori and Pacific communities. Restrictions regarding the following discretionary conditions together with guidelines for their use should also be considered for inclusion as a tool for licensing authorities as part of the Local Alcohol policy: • Presence of working CCTV including the holding of recordings for at least 28 days • Prescribed ratio of security staff to patrons • Size and quantity of alcohol containing drinks after midnight e.g. shots, doubles, single serve sales only. • No glass containers after midnight • High visibility clothing to be worn by security staff and be visible to others. • Certified manager to be on duty at specific times (club and BYO licences) • Compliance with approved Host Responsibility Policy (on licences) or Social Responsibility Policy (off licences) • No external alcohol related advertising (including branding) other than the trading name of the premises. • Ensure at least 50% of store front glazing is clear. • Exterior lighting • Specific definition of large events requiring the provision of Alcohol Management Plans • Provisions to manage outside areas and/or queues. • Keeping an incident log, ensuring it is kept up to date and providing it to the reporting agencies on request. • Mandatory reporting of violent incidents to Police • Provision of transport (areas lacking in public transport options) • Cessation of entertainment at a specified time • Noise control management plans • Food requirements (special licenses) • No more than 2 standard drinks per serve (events) • Display of particular products e.g. RTDs and high strength products • Display of promotions and discounts

LOCATION AND DENSITY PROVISIONS / FINAL LAP COMMENTS

entry sub #	Type	Name	Last	Submission category	Representing organisation or business	1. Do you agree with the location and density conditions generally?	2. Any other comments	1. Any other comments about any other provisions within the LAP?
1	Form	Allen	Scott	Individual	Individual	Yes		
2	Form	Alex	Kersjes	Individual	Individual	No		
3	Form	Parwinder	Nagra	Individual	Individual	No		

4	Form	Balwinder	Sandhu	Licensee	Big Barrel Hastings	no answer		
5	Form	Bruce	Nimon	Licensee	Kokako Farms	Yes		
6	Form	John	van den Berk	Business	John's Bakery ltd	No		In Europe the Service stations and McDonalds outlets all serve alcohol in their opening hours, It is not the sellers causing the problems it is the culture of our society.
7	Form	Daniel	Nelson	Licensee	Haha Wine Company	Yes		
8	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club inc.	Yes		
9	Form	Anita	Gaylard	Licensee	KartSport Hawkes Bay	Yes	no further comments	no
10	Form	peter	steers	Licensee	Hawks Bay and East Coast Aero club	Yes		
11	Form	Len and Marie	Mitchell	Individual	individual	Yes		
12	Form	Kim	Parker	Individual	individual	Yes		
13	Form	Will	Coltart	Individual	individual	Yes		The regular users of event licenses should be approached and asked how the HDC can help them operate quality events that draw tourists into the region.
14	Form	Shankar	Gc	Licensee	Gengy's Hastings	Yes		
15	Form	Grant	Edmonds	Licensee	Redmetal Vineyards	Yes		
16	Form	Kate	Galloway	Licensee	Mobius Wine ltd	Yes		
17	Form	Rachelle	Adams	Licensee	Element Vineyard Ltd	Yes		
18	Form	James	Ludlam	Licensee	President Kia Toa Bowling Club	Yes		no
19	Form	Kate	RADBURN	Licensee	Radburn Cellars	Yes		
20	Form	Guillaume	Thomas	Licensee	Maison Noire Ltd	Yes		
21	Form	Song	Han	Licensee	clive four square	Yes		
22	Form	Greg	Duff	Licensee	Clive Hotel	Yes		
23	Form	Jim	Poppelwell	Individual	individual	no answer		
24	Form	Sean	Burns	Licensee	AONZ Fine Wine Estates	Yes		
25	Form	Tash	Stuck	Licensee	Level 1	No		
26	Form	barbara	abbott	Individual	individual	No		
27	Form	Liz	Pollock	Licensee	LIZ POLLOCK & ASSOCIATES LTD	no answer		
28	Form	Marilyn	Te Paa	Licensee	Stortford lodge Social Club	Yes		
29	Form	Daniel	Pistone	Licensee	Sazio	no answer		
30	Form	Karnak	Heremia	Individual	individual	Yes		
31	Form	Alex	Hedley	Individual	individual	Yes	However, there should be more of them, covering a greater area of the city.	The LAP is an effective tool for changing alcohol availability. Alongside advertising and affordability, availability is one of the keyways to influence alcohol-related harm in our communities. I encourage the Council to adopt the draft LAP.
32	Form	cliff	Fernandes	Licensee	lot 2	Yes		great suggestions for closing times
33	Form	jess	trew	Individual	individual	Yes	Yes, I generally agree with the location and density conditions in the LAP. Limiting the number of alcohol outlets and where they can be located is a practical and evidence-based way to reduce alcohol-related harm. High outlet density is linked to increased rates of crime, violence, and health issues. By controlling how many licences are granted and where they are placed—especially in vulnerable areas like near schools or residential zones—we can help create a safer and healthier community.	
34	Form	Houkamau	Potae	Individual	individual	Yes		
35	Form	Evelyn	Jirkowsky	Individual	individual	Yes		
36	Form	Mala	Bishop	Stakeholder	Hastings District Council	Yes	These conditions provide certainty to applicants regarding restrictions on off-licences and have been developed to help prevent the proliferation of bottle stores in our most vulnerable communities.	No

37	Form	Trevor	Smith	Licensee	Big Barrel Stores	no answer		There were some valid points by both On & Off Licence holders at the meeting held recently by the Council, these need to be discussed with all interested parties and taken into consideration before the Laps is adopted...
38	Form	Beth	Elstone	Licensee	Littlestone	Yes		
39	Form	Taylor	Bevan	Stakeholder	Hastings Youth Council	Yes	<p>In areas like Flaxmere and Camberley where a large part of the population is under 25, restricting the issuance of new off-licences is a positive step.</p> <p>This comes down to the fact that these communities already face significant challenges, including higher rates of alcohol-related harm, and easy access to cheap, off-licence alcohol only adds to the risk - particularly for younger people.</p> <p>By limiting the number of bottle stores in these areas, the policy helps reduce the visibility and availability of alcohol, which can play a big role in shaping drinking habits, especially among youth. It also sends a message that the wellbeing of young people in these communities matters. Creating a safer, more supportive environment can help shift focus toward positive youth development.</p>	
40	Form and Substantial	Nathan	Cowie	Stakeholder	Community against Alcohol Harm	yes		
41	Form written	jessie	Moir	Individual	individual	no answer		I am advocating a tough line on availability of alcohol because alcohol is causing so much harm in our society
42	Form written	Hayley	Hansen	Individual	individual	yes		
43	Form written and substantial	Rachael	Gresham	Individual	individual	no answer		Too many families are struggling with all sorts of issues these days without having to deal with the attitudes of young people who have been drinking until 3am, issues of mental health created by excessive drinking and depression caused by poor decision-making which someone has documented on social media. The 3am finish perpetuates irresponsible behaviour and does not provide for our young people's health. Closing time should be 1 am at the latest. Frankly, I think it should be midnight. People will still go to drinking establishments because this is the nature of young people who want to meet friends and partners and they will probably end up spending more money in these same places as they will spend less on drinking at private residences. They will go earlier to the pubs as they won't want to cut themselves short of socialising time. Most importantly, they won't be exposed/encouraged to drink for hours on end and will get to bed earlier. Less of them will make stupid decisions and more of them will function productively in our communities after a better night's sleep.
44	email substantial	Brent	Eccles	Individual	individual	no answer		
45	substantial	Kristine	Larner	Stakeholder	Hawkes Bay Tourism Industry Association	no answer		We appreciate the decision made by Napier and Hastings Councils in 2013 to collaborate on the LAP to enhance consistency. While we recognise that the councils are consulting on their own LAPs separately, it is essential for us to stress the importance of consistency between the two. Inconsistencies in policy can lead to confusion among both residents and visitors and can negatively impact the seamless experience that we strive to provide in Hawke's Bay. A unified approach will ensure that the region is perceived as a cohesive and well-coordinated destination, which is essential for maintaining our reputation and attracting visitors. Having consistent policies across both councils will also help avoid any potential discrepancies that could arise from differing regulations. This consistency is particularly important for businesses and event organisers who operate across both Hastings and Napier, as it will simplify compliance and reduce administrative burdens. Hawke's Bay is renowned as New Zealand's food and wine country and is one of the Great Wine Capitals of the World. Any changes to the LAP must take into consideration the unique positioning of our region. The food and wine industry is a significant driver of tourism and economic growth in Hawke's Bay. Policies that negatively impact this sector could have far-reaching consequences for our local economy. It is essential that any policy changes support and enhance our reputation as a premier food and wine destination, rather than hinder it. Any reduction in operating hours for licensed premises could reduce our appeal to visitors, who come to experience the vibrant food and wine culture that Hawke's Bay offers. The hospitality sector, which includes restaurants, bars, and wineries, relies heavily on the flexibility of operating hours to cater to both locals and tourists. Restricting these hours could result in a less attractive destination, ultimately impacting the overall visitor experience and satisfaction. Additionally, the economic benefits derived from tourism are substantial, contributing significantly to the local economy. A decrease in visitor spend would not only affect the hospitality industry but also have a ripple effect on other sectors such as retail, accommodation, and transportation. It is crucial that the LAP changes are made with a comprehensive

								understanding of their potential impact on the tourism industry and the broader economic landscape of Hawke's Bay Conclusion: In conclusion, the Hawkes Bay Tourism Industry Association strongly advocates for a consistent and supportive LAP that aligns with the unique needs and strengths of our region. We believe that by working together, we can create a policy that promotes public safety while also fostering economic growth and maintaining Hawke's Bay's status as a leading food and wine destination.
46	substantial	Hamish	Saxton	Stakeholder	Hawkes Bay Tourism	no answer		Hawke's Bay's positioning is as New Zealand's Food and Wine Country. This differentiates our region from 29 other regions throughout the country competing for visitor spend. Food and Wine Country is underpinned by our recent (2023) admittance into the global network of Great Wine Capitals of the world. We would like the following to be taken into consideration during the review: • Please work to align policy decisions across Hawke's Bay Councils o Our region is promoted as Hawke's Bay. Visitors may not have an understanding that Napier Council is different to that of Hastings District within our small region, especially if regulations are different between the two. • Please work to protect Hawke's Bay's brand positioning o Our Food and Wine Country positioning and our Great Wine Capital status are vital to the promotion of the region. Any significant dilution or restriction of the food and wine/beverage-related experience could be detrimental to our brand reputation.
47	substantial	Ashleigh	Rhodes	Licensee	Foodstuffs North island	no answer		
48	substantial	Nina	Dally	Licensee	Woolworths NZ	yes	supports distinction made between types of off licences	
49	substantial	Marisa Bidois		Stakeholder	Restaurants Association	mixed	Proximity to sensitive facilities - Decisions regarding restrictions on proximity to sensitive sites should be evidence-based rather than based on intuition or speculation about what could reduce alcohol-related harm. It is the Restaurant Association's position that any proximity restrictions should be considered on a case by case basis. The Restaurant Association agrees that the policy for new on-licence locations in proximity to sensitive facilities should remain as is. Off-licence density- While our preferred option would be the status quo, if the Council does implement a temporary freeze on new licence applications, the Restaurant Association believes this should not be implemented as a blanket freeze - rather, it should only apply to certain licence types. It is our position that the risk from on-licence restaurants and cafes is significantly lower than that of off-licence outlets (or even other on-licences, such as night clubs). The Council should not deter restaurants and cafes from investing in high deprivation communities which is likely to occur if they are unable to obtain an on-licence.	Modernising approaches to Restaurant licensing <ul style="list-style-type: none">• Conditions relating to minimum numbers of qualified managers• Renewal of licences
50	substantial	Kim	Thorp	Licensee	Blackbarn	no answer		
51	substantial	hamish	Gordon	Licensee	Shed 530	no answer		
52	substantial	Carl	Woodman	Licensee	Shed 530	no answer		
53	substantial	Kel	Dixon	Licensee	shed 530	no answer		
54	substantial	Shane	Phillips	Stakeholder	Hospitality Association NZ	no answer		
55	proforma	Aaron	Mills	Business	Havelock North Motor Lodge	no answer		
56	substantial	Jennifer	Lamm	Stakeholder	Alcohol Healthwatch	yes - could go further	Encourage proximity provisions, including preventing new licenced premises from establishing close to other licenced premises to reduce clustering. There is a need to generally protect vulnerable users of sensitive sites from exposure to off licence, on licence and club licence premises and the associated negative amenity effects. Protecting vulnerable populations also can address their disproportionate and inequitable exposure and experience of alcohol harms, particularly for young people...we recommend that this LAP should include a policy that may prevent new licensed premises from locating in close proximity to sites such as education facilities, youth centres, places of worship, rehabilitation treatment centres and near council owned and managed facilities. Support exclusion zones in Flaxmere and Camberley, however recommend Akina, Mayfair and St Leonards.	Provided deprivation detail data for Flaxmere and Camberley from Auckland University.
57	substantial	Matt	Radford	Stakeholder	Health NZ	no	Health NZ considers there are too many alcohol outlets in Hastings, particularly off-licences. The availability of alcohol in Hastings is greater than the national average, with 259 total licences. This is 30% more licences than the national average, equating to one licence for every 331 Hastings residents, compared to one for every 434 residents nationally. This high level of availability raises concerns about the impact of alcohol-related harm in the community. Off-licences contribute significantly to alcohol-related harm, with 76% of alcohol consumed by hazardous drinkers purchased from these premises. A study on alcohol-related	Health NZ recommends the Hastings LAP closely aligns with the Napier LAP, which is also currently being consulted on. Misalignment between key provisions in the LAPs (for instance, hours of sale) may worsen alcohol-related harm.

							<p>emergency department presentations found the most common place patients purchased alcohol was from off-licence premises. Health NZ recommends Council considers expanding the current provisions restricting further off-licences in Flaxmere and Camberley to all of Hastings i.e. introducing a sinking lid policy. This approach would help reduce alcohol availability over time, mitigating the associated harms and promoting better health outcomes for Hastings residents. Alcohol-related harm is evident in all parts of Hastings, as evidenced in police incident data by suburb.¹⁵ Hazardous drinking occurs across different demographics,⁴ reinforcing the need for broad regulation rather than targeting specific areas or population groups. Additionally, Hastings' compact size means most locations are within a 5-10 minute drive of an off-licence, further contributing to alcohol accessibility and associated harm. The density of alcohol outlets is closely linked to increased harm. Both off-licence and on-licence premises contribute to a range of social harms, including police incidents and motor vehicle accidents. Research has also shown that the density of supermarkets and grocery stores selling alcohol is associated with a range of alcohol-related harms across the North Island.</p> <p>Hastings has a high number of off-licences (111),exceeding other services such as pharmacies (17). Findings from the community survey support reducing alcohol availability, with 61% of Hawke's Bay residents wanting fewer bottle stores. Off-licence premises density is associated with shorter travel distances, longer opening hours and price competition, which correlates with heavy episodic drinking and alcohol-related problems in communities. Given these factors, Health NZ supports district-wide measures to reduce alcohol availability and its negative impacts. This includes not issuing any more off-licences i.e. a sinking lid approach.</p>	
58	substantial	Michael	Swan	Licensee	Liquid Events	no answer		
59	written form	Kowhai	Kahika	Individual	individual	no answer		
60	substantial	Reuben		Licensee	Madcap Music	no answer		
61	pro forma	Reuben	Vergis	Licensee	Outfield Festival	no answer		
62	substantial	Ray	Wylie	Stakeholder	NZ Police	no answer		

Appendix two: Submissions Binder

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#1]
Date: Thursday, 20 March 2025 9:13:57 AM

Name * Allen Scott

Postal address *

☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Hastings residential

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 3am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 2am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

7. If no, which option is the most appropriate closing time? 2am

Do you agree with the following proposed changes: No

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: No

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 1am

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? Yes

2. Any other comments As long as they are left as they are

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#2]
Date: Thursday, 20 March 2025 1:03:19 PM

Name * Alex Kersjes

Postal address *

☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Havelock North

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 4am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 3am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

7. If no, which option is the most appropriate closing time? 3am

8. Any other comments:

Introduction

I am writing to formally oppose the proposal to further limit hospitality operating hours by enforcing a 2 AM closing time instead of 3 AM. This policy is not evidence-based and directly harms an already struggling industry, which plays a vital role in the vibrancy, economy, and social life of our region.

Lack of Evidence – Where Are the Statistics?

Before imposing further restrictions, the Council must present clear evidence demonstrating that an additional hour of operation is directly responsible for increased harm.

- Where is the data proving that harm is significantly worse between 2 AM and 3 AM?
- What justifies this change beyond a blanket assumption that earlier closing equals less harm?
- Has any research been done to compare harm in controlled hospitality environments vs. unregulated private settings?

Without solid data, this proposal appears arbitrary and fails to meet the standard of considered policy-making.

Impact on Hastings' Nightlife & Economy

Hastings is already struggling with a lack of nightlife, and this restriction will only make it worse. Our leaders call on more vibrancy so support those who provide the same. With an even more restricted nightlife younger patrons on social trips or considering travel here will not attend if our late night entertainment precincts are restricted or as they might say “lame”.

- We are mocked for our non-existent night scene, and now it faces further erosion.
- Council frequently talks about making Hastings a vibrant region—yet this directly contradicts that goal.
- Hospitality venues need every hour they can get to survive, particularly after years of economic hardship.
- Patrons, especially those with disposable income, will choose to go elsewhere, further harming local business.

Increased Risk of Harm

Reducing licensed premises' hours does not reduce drinking—it just pushes it into uncontrolled environments where harm is far more likely to occur.

- Licensed venues are regulated spaces with security, responsible hosts, and emergency response capabilities.
- Most alcohol-related harm occurs in private homes, not in well-managed bars.
- Closing bars at 2 AM simply forces intoxicated people into the streets an hour earlier, when patrons are still “vibrant” increasing the risk of disorderly behaviour and crime on our streets and in private homes, with the party likely to continue elsewhere rather than finishing up.

Personal Perspective – Freedom of Choice

I am not a regular late-night patron, but when I do go out once or twice a year, I want the option to enjoy a proper night out without being forced home early. This is not just about the hospitality industry, it's about freedom of choice for responsible adults who want to support local businesses and enjoy a night out in their own city.

If this restriction is implemented, many of us will simply take our money elsewhere, travelling out of town for a proper night out. This does nothing but weaken Hastings' economy and send local revenue to other regions.

Conclusion

- This proposal achieves nothing positive
- No proven reduction in harm.
- Increased risks from uncontrolled drinking environments.
- Financial damage to struggling hospitality businesses.
- Reduced enjoyment and vibrancy in Hastings.
- Driving or discouraging patrons (and their money) from the region.

Rather than restricting local venues, the Council should be investing in them, working with operators to enhance safety measures, and supporting a thriving nightlife industry.

I urge the Council to reject this unnecessary and harmful restriction and focus on solutions that support both public safety and local business sustainability.

Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	9am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc?	9am
4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	Yes
6. Which option is the most appropriate closing time for supermarkets?	9pm
7. Which option is the most appropriate closing time for all other off licences?	9pm
Do you agree with the proposed changes:	No
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
2. If no, which option is the most appropriate closing time: earlier than	2am
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	No
1. Do you agree with the discretionary conditions generally?	No
1. Do you agree with the location and density conditions generally?	No
2. Have you submitted to the Napier LAP review process?	No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#3]
Date: Thursday, 20 March 2025 2:31:19 PM

Name * Parwinder Nagra

Postal address *

☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Preferred method:

Which area do you live in? Hastings residential

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 3am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? No

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 2am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

7. If no, which option is the most appropriate closing time? 3am

Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	9am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc?	10am
4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	No
6. Which option is the most appropriate closing time for supermarkets?	10pm
7. Which option is the most appropriate closing time for all other off licences?	9pm
Do you agree with the proposed changes:	No
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
2. If no, which option is the most appropriate closing time: earlier than	2am
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	No
1. Do you agree with the discretionary conditions generally?	No
1. Do you agree with the location and density conditions generally?	No
2. Have you submitted to the Napier LAP review process?	No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#4]
Date: Wednesday, 26 March 2025 9:41:55 AM

Name *	Balwinder Sandhu
Postal address *	<input type="text"/>
Email *	<input type="text"/>
Daytime phone / mobile *	<input type="text"/>
Representing organisation or business	Big Barrel Hastings
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Which area do you live in?	Hastings residential
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
2. If no, which option is the most appropriate closing time?	1am
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	

2. Which is the most appropriate opening time for supermarkets? 8am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#5]
Date: Thursday, 27 March 2025 10:42:43 AM

Name *	Bruce Nimon
Postal address *	<input type="text"/>
Email *	<input type="text"/>
Daytime phone / mobile *	<input type="text"/>
Representing organisation or business	Kokako Farms
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Which area do you live in?	Rural
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	No
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? No

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#6]
Date: Thursday, 27 March 2025 12:27:50 PM

Name * John van den Berk

Postal address * ☐

Email *

Daytime phone / mobile *

Representing organisation or business John's Bakery Ltd

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Hastings residential

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 3am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? No

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 12am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

7. If no, which option is the most appropriate closing time? 2am

Do you agree with the following proposed changes:	No
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	8am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc?	8am
4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	Yes
6. Which option is the most appropriate closing time for supermarkets?	10pm
7. Which option is the most appropriate closing time for all other off licences?	10pm
Do you agree with the proposed changes:	No
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
2. If no, which option is the most appropriate closing time: earlier than	12am midnight
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	No
1. Do you agree with the discretionary conditions generally?	Yes
1. Do you agree with the location and density conditions generally?	No
1. Any other comments about any other provisions within the LAP?	In Europe the Service stations and Mcdonald outlets all serve alcohol in their opening hours, It is not the sellers causing the problems it is the culture of our society.
2. Have you submitted to the Napier LAP review process?	No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#7]
Date: Thursday, 27 March 2025 3:24:11 PM

Name * Daniel Nelson

Postal address * ☐

Email *

Daytime phone / mobile *

Representing organisation or business Haha Wine Company

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Havelock North

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 3am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 2am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

7. If no, which option is the most appropriate closing time? 2am

Do you agree with the following proposed changes:	No
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	7am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc?	9am
4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	No
6. Which option is the most appropriate closing time for supermarkets?	10pm
7. Which option is the most appropriate closing time for all other off licences?	10pm
Do you agree with the proposed changes:	No
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
2. If no, which option is the most appropriate closing time: earlier than	12am midnight
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	Yes
1. Do you agree with the discretionary conditions generally?	Yes
1. Do you agree with the location and density conditions generally?	Yes
2. Have you submitted to the Napier LAP review process?	No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#8]
Date: Thursday, 27 March 2025 3:31:13 PM

Name *	Marilyn Te Paa
Postal address *	<input type="checkbox"/>
Email *	<input type="text"/>
Daytime phone / mobile *	<input type="text"/>
Representing organisation or business	Stortford lodge Social Club inc.
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Which area do you live in?	Hastings residential
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
8. Any other comments:	With the down turn in hospitality i agree to reduced hours. If it is proved it can reduced alcohol related incidents i am all for it.
Do you agree with the following proposed changes:	No

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 10am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 8pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: No

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 1am

3. Any other comments: What about new years eve. Plus special occasions. We would probably use the 1am closing maybe twice a year. As we are a small club. But it is always nice for that extra hour if needed.

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#9]
Date: Friday, 28 March 2025 9:31:44 AM

Name * Anita Gaylard

Postal address *

☐

Email *

Daytime phone / mobile *

Representing organisation or business KartSport Hawkes Bay

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Preferred method:

Which area do you live in? Havelock North

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 2am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 2am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

7. If no, which option is the most appropriate closing time?	2am
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	10am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc?	10am
4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	Yes
5. Any other comments:	alcohol should not be sold at supermarkets at all. There are plenty of bottle stores available to purchase from.
6. Which option is the most appropriate closing time for supermarkets?	8pm
7. Which option is the most appropriate closing time for all other off licences?	10pm
Do you agree with the proposed changes:	No
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
2. If no, which option is the most appropriate closing time: earlier than	1am
3. Any other comments:	no further comments
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	Yes
2. Any other comments	these should be considered on a case by case basis
1. Do you agree with the discretionary conditions generally?	Yes
1. Do you agree with the location and density conditions generally?	Yes
2. Any other comments	no further comments

1. Any other comments about any no
other provisions within the LAP?

2. Have you submitted to the Napier No
LAP review process?

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#10]
Date: Friday, 28 March 2025 6:35:54 PM

Name *	peter steers
Postal address *	<input type="checkbox"/>
Email *	<input type="text"/>
Daytime phone / mobile *	
Representing organisation or business	Hawks Bay and East Coast Aero club
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Which area do you live in?	Rural
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	10am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#11]
Date: Tuesday, 1 April 2025 10:29:48 AM

Name * Len and Marie Mitchell

Postal address * ☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Other

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 1am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 12am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

7. If no, which option is the most appropriate closing time? 1am

8. Any other comments: restaurants should close at a reasonable hour, who eats at 1am in the morning. 1 or 2am is plenty for others.

Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	9am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc?	9am
4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	Yes
6. Which option is the most appropriate closing time for supermarkets?	9pm
7. Which option is the most appropriate closing time for all other off licences?	9pm
Do you agree with the proposed changes:	Yes
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
2. If no, which option is the most appropriate closing time: earlier than	12am midnight
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	Yes
1. Do you agree with the discretionary conditions generally?	Yes
1. Do you agree with the location and density conditions generally?	Yes
2. Have you submitted to the Napier LAP review process?	No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#12]
Date: Wednesday, 2 April 2025 3:58:09 PM

Name * Kim Parker

Postal address * ☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 3am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? No

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 3am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

7. If no, which option is the most appropriate closing time? 3am

Do you agree with the following proposed changes: No

1. A reduction in hours for off

licences generally

2. Which is the most appropriate opening time for supermarkets? 7am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? No

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: No

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 2am

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? No

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#13]
Date: Wednesday, 2 April 2025 5:13:27 PM

Name * Will Coltart

Postal address * ☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Havelock North

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 3am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: No

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 7am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc?	7am
4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	Yes
6. Which option is the most appropriate closing time for supermarkets?	10pm
7. Which option is the most appropriate closing time for all other off licences?	11pm
Do you agree with the proposed changes:	Yes
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	No
1. Do you agree with the discretionary conditions generally?	No
2. Any other comments	There are already adequate discretionary conditions. The event's space is already very difficult to operate in, further restrictions will stifle events in the region.
1. Do you agree with the location and density conditions generally?	Yes
1. Any other comments about any other provisions within the LAP?	The regular users of event licenses should be approached and asked how the HDC can help them operate quality events that draw tourists into the region.
2. Have you submitted to the Napier LAP review process?	No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#14]
Date: Monday, 7 April 2025 1:09:44 PM

Name *	Shankar Gc
Postal address *	<input type="checkbox"/>
Email *	<input type="text"/>
Daytime phone / mobile *	
Representing organisation or business	Gengy's Hastings
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Preferred method:	Via conference call
Which area do you live in?	Napier
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	

2. Which is the most appropriate opening time for supermarkets? 10am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? No

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 12am midnight

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#15]
Date: Monday, 7 April 2025 1:16:55 PM

Name *	Grant Edmonds
Postal address *	<input type="text"/>
Email *	<input type="text"/>
Daytime phone / mobile *	<input type="text"/>
Representing organisation or business	Redmetal Vineyards
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Which area do you live in?	Rural
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	10am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#16]
Date: Monday, 7 April 2025 1:22:06 PM

Name * Kate Galloway

Postal address * ☐

Email *

Daytime phone / mobile *

Representing organisation or business Mobius Wine Ltd

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Havelock North

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 3am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? No

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 2am

7. If no, which option is the most appropriate closing time? 2am

Do you agree with the following proposed changes: No

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 7am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 7am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 11pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: No

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 2am

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#17]
Date: Monday, 7 April 2025 1:57:37 PM

Name *	Rachelle Adams
Postal address *	<input type="text"/>
Email *	<input type="text"/>
Daytime phone / mobile *	<input type="text"/>
Representing organisation or business	Element Vineyard Ltd
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Which area do you live in?	Rural
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	No
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	8am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? No

6. Which option is the most appropriate closing time for supermarkets? 11 pm

7. Which option is the most appropriate closing time for all other off licences? 11 pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#18]
Date: Monday, 7 April 2025 2:27:57 PM

Name * James Ludlam

Postal address * ☐

Email *

Daytime phone / mobile *

Representing organisation or business President Kia Toa Bowling Club

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Hastings

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 12am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: No

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 11pm

7. Which option is the most appropriate closing time for all other off licences? 11pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

1. Any other comments about any other provisions within the LAP? no

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#19]
Date: Monday, 7 April 2025 2:28:35 PM

Name * Kate RADBURND

Postal address * ☐

Email *

Daytime phone / mobile *

Representing organisation or business Radburnd Cellars

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: No

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 7am

3. Which is the most appropriate 9am

opening time for bottle stores and cellar doors etc?

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? No

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: No

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 1am

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

2. Any other comments Set appropriately for the particular activity

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#20]
Date: Monday, 7 April 2025 5:51:30 PM

Name * Guillaume Thomas

Postal address *

☐

Email *

Daytime phone / mobile *

Representing organisation or business Maison Noire Ltd

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 8am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 8am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same Yes

hours as bottle stores and cellar doors)?

6. Which option is the most appropriate closing time for supermarkets?	10pm
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7. Which option is the most appropriate closing time for all other off licences?	10pm
--	------

Do you agree with the proposed changes:	No
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1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than	1am
---	-----

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	Yes
---	-----

1. Do you agree with the discretionary conditions generally?	Yes
--	-----

1. Do you agree with the location and density conditions generally?	Yes
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2. Have you submitted to the Napier LAP review process?	No
---	----

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#21]
Date: Monday, 7 April 2025 9:18:57 PM

Name *	Song Han
Postal address *	<input type="checkbox"/>
Email *	<input type="text"/>
Daytime phone / mobile *	
Representing organisation or business	clive four square
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Preferred method:	Via conference call
Which area do you live in?	CLIVE
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
2. If no, which option is the most appropriate closing time?	12am
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
5. If no, which option is the most appropriate closing time?	12am
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes

7. If no, which option is the most appropriate closing time?	12am
Do you agree with the following proposed changes:	No
1. A reduction in hours for off licences generally	
2. Which is the most appropriate opening time for supermarkets?	7am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc?	9am
4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	No
5. Any other comments:	SUPERMARKET is the place for customers to buy everything including liquor, it makes much easier for customers to buy everything at the same time, unlike bottle stores which only sell liquor.
6. Which option is the most appropriate closing time for supermarkets?	9pm
7. Which option is the most appropriate closing time for all other off licences?	9pm
Do you agree with the proposed changes:	Yes
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
2. If no, which option is the most appropriate closing time: earlier than	10pm
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	No
1. Do you agree with the discretionary conditions generally?	Yes
1. Do you agree with the location and density conditions generally?	Yes
2. Have you submitted to the Napier LAP review process?	No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#22]
Date: Tuesday, 8 April 2025 10:35:13 AM

Name * Greg Duff

Postal address * ☐

Email *

Daytime phone / mobile *

Representing organisation or business Clive Hotel

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Hastings residential

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

8. Any other comments: Nothing Good happen after 10pm. That why we are closed by 10pm even though our license runs through to midnight.

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off

licences generally

2. Which is the most appropriate opening time for supermarkets? 10am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#23]
Date: Tuesday, 8 April 2025 10:51:06 AM

Name * Jim Poppelwell

Postal address * ☐

Email *

Daytime phone / mobile * 02102378087

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Napier

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 3am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? No

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 2am

7. If no, which option is the most appropriate closing time? 2am

Do you agree with the following proposed changes: No

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 7am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? No

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 11pm

Do you agree with the proposed changes? No

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 1am

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? No

2. Any other comments

It is difficult to comment without more detail being provided about how these will be enforced. But when it comes to special licence conditions, consideration should be given to the patron experience.

If I attend a concert with friends I do not want to spend most of the time in a queue just to get a single drink. It is common practice for members of a group to take turns queuing so as to maximise the amount of time hanging out and enjoying the entertainment. Starting with two serves per person reducing to one is dogmatic and inflexible. Flexibility is key to good crowd management, preset rules that do not take the situation at the time into account are restrictive and can have unintended negative outcomes.

Looking at other LAP proposals around the country it appears Hastings is an outlier in this instance, and therefore there is a danger that the district will gain a reputation for poor event experiences, which could have severe consequences for the local industry, particularly larger concert venues such as Black Barn and Tomoana Showgrounds.

2. Have you submitted to the Napier LAP review process? Yes

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#24]
Date: Tuesday, 8 April 2025 1:02:46 PM

Name * Sean Burns

Postal address * ☐

Email *

Daytime phone / mobile *

Representing organisation or business AONZ Fine Wine Estates

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#25]
Date: Tuesday, 8 April 2025 2:46:09 PM

Name *	Tash Stuck
Postal address *	<input type="checkbox"/>
Email *	<input type="text"/>
Daytime phone / mobile *	
Representing organisation or business	Level 1
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you agree or disagree with the following proposed changes:	No
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
2. If no, which option is the most appropriate closing time?	3am
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	No
Do you agree with the following changes:	No
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
5. If no, which option is the most appropriate closing time?	2am
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	No
7. If no, which option is the most appropriate closing time?	3am
Do you agree with the following proposed changes:	No
1. A reduction in hours for off licences generally	
2. Which is the most appropriate	8am

opening time for supermarkets?

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? No

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: No

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 1am

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? No

1. Do you agree with the discretionary conditions generally? No

1. Do you agree with the location and density conditions generally? No

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#26]
Date: Tuesday, 8 April 2025 6:09:44 PM

Name * barbara abbott

Postal address *

☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 10am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?	No
5. Any other comments:	i do not know the times for supermarket but they should be less than bottle stores
6. Which option is the most appropriate closing time for supermarkets?	8pm
7. Which option is the most appropriate closing time for all other off licences?	10pm
Do you agree with the proposed changes:	Yes
1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?	
1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	Yes
1. Do you agree with the discretionary conditions generally?	No
1. Do you agree with the location and density conditions generally?	No
2. Have you submitted to the Napier LAP review process?	No

ATTACHMENT ONE

From:

To:

Subject:

Date:

Wufoo

Janine Green

HDC - Local Alcohol Policy [#27]

Wednesday, 9 April 2025 9:17:09 AM

Name *

Liz Pollock

Postal address *

Email *

Daytime phone / mobile *

Representing organisation or business

LIZ POLLOCK & ASSOCIATES LTD

Do you wish to speak to council in support of your submission (10 minute allocation slots)?

No

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?

No

1. Do you agree with the discretionary conditions generally?

No

2. Any other comments

I DISAGREE with the proposed changes to the serve reduction systems going from maximum serves of 2 per sale reducing to 1. I believe that this should be left to the discretion of the Duty Manager / License holder.

2. Have you submitted to the Napier LAP review process?

Yes

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#28]
Date: Wednesday, 9 April 2025 12:09:16 PM

Name *	Marilyn Te Paa
Postal address *	<input type="text"/>
Email *	<input type="text"/>
Daytime phone / mobile *	<input type="text"/>
Representing organisation or business	Stortford lodge Social Club
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Which area do you live in?	Hastings residential
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	
2. Which is the most appropriate	9am

opening time for supermarkets?

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#29]
Date: Wednesday, 9 April 2025 5:42:33 PM

Name * Daniel Pistone

Postal address *

☐

Email *

Daytime phone / mobile *

Representing organisation or business Sazio

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Havelock North

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? No

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

2. Which is the most appropriate opening time for supermarkets? 7am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 8am

4. Do you think supermarkets No

should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?

6. Which option is the most appropriate closing time for supermarkets?	9pm
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7. Which option is the most appropriate closing time for all other off licences?	10pm
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1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?	Yes
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From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#30]
Date: Thursday, 10 April 2025 9:58:04 AM

Name * Karnak Heremia

Postal address *

☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Preferred method: In person at the council

Which area do you live in? Rural

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 8pm

7. Which option is the most appropriate closing time for all other off licences? 8pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#31]
Date: Friday, 11 April 2025 8:20:10 AM

Name * Alex Hedley

Postal address *

☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Napier

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and

cellar doors etc?

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?

Yes

6. Which option is the most appropriate closing time for supermarkets?

8pm

7. Which option is the most appropriate closing time for all other off licences?

8pm

8. Any other comments:

Consider how this question is framed in your analysis. This could be easily interpreted as the closing time for supermarkets in general, however the intent here is only in relation to alcohol sales. Supermarket can continue to operate as they wish with regard to the sale of general goods.

Do you agree with the proposed changes:

Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?

Yes

1. Do you agree with the discretionary conditions generally?

Yes

1. Do you agree with the location and density conditions generally?

Yes

2. Any other comments

However, there should be more of them, covering a greater area of the city.

1. Any other comments about any other provisions within the LAP?

The LAP is an effective tool for changing alcohol availability. Alongside advertising and affordability, availability is one of the key ways to influence alcohol-related harm in our communities. I encourage the Council to adopt the draft LAP.

2. Have you submitted to the Napier LAP review process?

Yes

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#32]
Date: Friday, 11 April 2025 11:05:02 AM

Name *	cliff Fernandes
Postal address *	<input type="checkbox"/>
Email *	<input type="text"/>
Daytime phone / mobile *	
Representing organisation or business	lot 2
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Preferred method:	In person at the council
Which area do you live in?	Hastings residential
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off licences generally	

2. Which is the most appropriate opening time for supermarkets? 7am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

1. Any other comments about any other provisions within the LAP? great suggestions for closing times

2. Have you submitted to the Napier LAP review process? No

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#33]
Date: Friday, 11 April 2025 2:01:25 PM

Name * jess trew

Postal address * ☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Rural

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

8. Any other comments:

I support the proposed reduction in hours for on-licence and off-licence alcohol venues because it's a practical step towards reducing alcohol-related harm in our community. Limiting the hours of sale can help decrease incidents of alcohol-fuelled violence, accidents, and health issues. Research shows that reduced trading hours are linked to lower rates of hospital admissions, crime, and harm in public spaces. This change prioritises community wellbeing and helps create a safer, healthier environment for everyone.

Do you agree with the following Yes

proposed changes:

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

5. Any other comments: I believe supermarkets should have the same trading hours as all other off-licence outlets to ensure a fair and consistent approach to alcohol harm prevention. Allowing supermarkets to sell alcohol for longer undermines the efforts to reduce alcohol-related harm in our communities. Longer hours increase accessibility and availability.

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

3. Any other comments: I support a reduction in hours for club licences because it can play a key role in reducing alcohol-related harm, particularly late at night when the risk of incidents like violence, disorder, and accidents is higher. Shortening club hours encourages more responsible drinking habits and helps protect both club members and the wider community. It also supports emergency services and healthcare providers by lessening the strain during peak hours.

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

2. Any other comments

I think it's important that opening and closing times are set in the LAP for special licences to help manage alcohol-related harm at events. Having clear time limits provides consistency, sets expectations for event organisers, and supports responsible alcohol use. It also gives local

authorities better control over late-night events where the risk of harm is higher. Setting reasonable hours helps protect public safety, reduces the potential for disorder, and ensures events remain enjoyable and safe for everyone involved.

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Any other comments

Yes, I generally agree with the location and density conditions in the LAP. Limiting the number of alcohol outlets and where they can be located is a practical and evidence-based way to reduce alcohol-related harm. High outlet density is linked to increased rates of crime, violence, and health issues. By controlling how many licences are granted and where they are placed—especially in vulnerable areas like near schools or residential zones—we can help create a safer and healthier community.

2. Have you submitted to the Napier LAP review process? Yes

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#34]
Date: Friday, 11 April 2025 2:22:23 PM

Name * Houkamau Potae

Postal address * ☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Hastings residential

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: Yes

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 10am

3. Which is the most appropriate opening time for bottle stores and

cellar doors etc?

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)?

Yes

6. Which option is the most appropriate closing time for supermarkets?

9pm

7. Which option is the most appropriate closing time for all other off licences?

9pm

Do you agree with the proposed changes:

Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?

Yes

1. Do you agree with the discretionary conditions generally?

Yes

2. Any other comments

There could be more measures to support those who choose not to drink, clearly sectioned off areas for non-alcoholic areas and minors.

1. Do you agree with the location and density conditions generally?

Yes

2. Have you submitted to the Napier LAP review process?

Yes

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#35]
Date: Monday, 14 April 2025 6:32:35 AM

Name * Evelyn Jirkowsky

Postal address *

☐

Email *

Daytime phone / mobile *

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Rural

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

2. If no, which option is the most appropriate closing time? 1am

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 12am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? Yes

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 7am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? No

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? No

Licensing Inspectors Submission

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#36]
Date: Monday, 14 April 2025 8:15:10 AM

Name *	Mala Bishop
Postal address *	<input type="checkbox"/>
Email *	<input type="text"/>
Daytime phone / mobile *	068715000
Representing organisation or business	Hastings District Council – Licensing Inspectors
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	No
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Which area do you live in?	Hastings residential
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	No
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
5. If no, which option is the most appropriate closing time?	12am
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
8. Any other comments:	In relation to 4.0 above it seems unlikely people would be dining at 1.00am. We suggest reducing to 12.00am. If a restaurant was holding an event such as a wedding a special licence could be applied for.

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

5. Any other comments: Longer hours increase the potential for alcohol related harm due to greater availability

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

8. Any other comments: Longer hours increase the potential for alcohol related harm due to greater availability

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

3. Any other comments: Longer hours increase the potential for alcohol related harm due to greater availability

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

2. Any other comments This provision is guidance and there is flexibility in discretion from the DLC for the odd event that may go beyond those hours.

1. Do you agree with the discretionary conditions generally? Yes

2. Any other comments Currently the DLC has the ability to impose discretionary conditions and these provisions reinforce this. They are used on a case-by-case basis based on risk.

1. Do you agree with the location and density conditions generally? Yes

2. Any other comments	These conditions provide certainty to applicants regarding restrictions on off-licences and have been developed to help prevent the proliferation of bottle stores in our most vulnerable communities.
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1. Any other comments about any other provisions within the LAP?	No
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2. Have you submitted to the Napier LAP review process?	No
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From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#37]
Date: Monday, 14 April 2025 10:25:18 AM

Name * Trevor Smith

Postal address *

☐

Email *

Daytime phone / mobile *

Representing organisation or business Big Barrel Stores

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Napier

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

1. Do you agree with the discretionary conditions generally? Yes

2. Any other comments

We believe the 'No single sale of Ready to Drink (RTD) or mainstream beer under 500ml' should be 'No single sale of Ready to Drink (RTD) or mainstream beer 500ml or under' (excluding Craft Beer). This would keep it consistent with other councils in NZ and makes it easier for Off Premise stores to implement as it is then clear and includes 500ml Strong beers.

Also, please define 'Mainstream Beers', what is Mainstream from the Councils perspective? This is unclear and can be interpreted in different ways by Off Licence holders so stores can apply this in different ways.

1. Any other comments about any other provisions within the LAP?

There were some valid points by both On & Off Licence holders at the meeting held recently by the Council, these need to be discussed with all interested parties and taken into consideration before the Laps is adopted...

2. Have you submitted to the Napier LAP review process? Yes

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#38]
Date: Monday, 14 April 2025 3:38:31 PM

Name * Beth Elstone

Postal address *

☐

Email *

Daytime phone / mobile *

Representing organisation or business Littlestone

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Do you wish to give feedback in NZ sign language? No

Do you want to give feedback in te reo Māori? No

Which area do you live in? Clive

Do you agree or disagree with the following proposed changes: Yes

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

5. If no, which option is the most appropriate closing time? 2am

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

7. If no, which option is the most appropriate closing time? 2am

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

2. If no, which option is the most appropriate closing time: earlier than 12am midnight

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? No

2. Any other comments

I think with Special licensing that each application should be considered in its own merit. Not every event, or target audience is the same, and imposing blanket discretionary measures could have the potential to be mis-interpreted depending on who is reviewing the applications. Limiting alcohol percentages creates a barrier and the ability to activate various brands or experiences within the event environment with the right audience. I believe that with the correct AMP in place these higher alcohol content products can be managed, so applying a blanket % limit would be more red tape when creating events where a cocktail or spirit ranging is the focus (Gin festivals, etc). Limiting special licenses to begin at a serve limit of 2 drinks and scaling back to 1 is unrealistic within large scale events operationally at the beginning of the day. It also creates a tendency of angst and frustration with the patrons, leading to other types of disturbances. Whilst this may be appropriate for some high risk audiences, there are many audiences where a 4 serve limit to begin with is very manageable under a good AMP with good duty managers and security planning in and around the event. I believe that the licensee managing the license should be able to make the decision on when its appropriate to scale back

serves in discussion with the various agencies who attend the events and alcohol meetings. In a nutshell, good event operators go over and above in terms of risk mitigation with alcohol harm, and I believe the applications should be assessed based on the merit and history of the applicant managing special license, the audience risk profile, and the alcohol management plan. A one size fits all approach will become a deterrent to events being hosted within an area that applies too much red tape to good event operators.

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? Yes

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#39]
Date: Monday, 14 April 2025 4:41:06 PM

Name * Taylor Bevan

Postal address *

☐

Email *

Daytime phone / mobile *

Representing organisation or business Hastings Youth Council

Do you wish to speak to council in support of your submission (10 minute allocation slots)? No

Which area do you live in? Hastings residential

Do you agree or disagree with the following proposed changes: No

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

3. Do you agree with the one way door provision (where people can not come in after a certain time)? Yes

Do you agree with the following changes: No

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am? No

8. Any other comments:

Reducing closing hours of on-licence venues in general could push social gatherings involving youth into less regulated, unsafe environments like house parties or street drinking. Venues provide a controlled setting with security and trained staff, helping to ensure safer nights out. Cutting an hour from licensed nightlife doesn't stop late-night socialising, but rather makes it riskier.

Additionally, many young people work in the hospitality industry, often relying on late-night shifts to earn a living while studying or supporting themselves. Reducing closing hours would cut these shifts short, leading to fewer job opportunities and reduced income for youth. This change not only impacts their financial stability but also limits valuable work experience in a competitive job market.

Do you agree with the following proposed changes: Yes

1. A reduction in hours for off licences generally

2. Which is the most appropriate opening time for supermarkets? 9am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 9am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 10pm

7. Which option is the most appropriate closing time for all other off licences? 10pm

8. Any other comments:

The reason for the support in reduction of opening/closing hours for off-licence establishments is that off-licence drinking is typically less safe than on-licence drinking because it happens without trained staff to monitor consumption, check for underage drinkers, intervene when someone has had too much, or call for help in emergencies. On-licence venues offer a level of control and oversight that helps reduce alcohol-related harm for young people – something off-licence drinking simply can't provide.

1. Do you agree with the location and density conditions generally? Yes

2. Any other comments

In areas like Flaxmere and Camberley where a large part of the population is under 25, restricting the issuance of new off-licences is a positive step.

This comes down to the fact that these communities already face significant challenges, including higher rates of alcohol-related harm, and easy access to cheap, off-licence alcohol only adds to the risk – particularly for younger people.

By limiting the number of bottle stores in these areas, the policy helps reduce the visibility and availability of alcohol, which can play a big role in shaping drinking habits, especially among youth. It also sends a message that the wellbeing of young people in these communities matters. Creating a safer, more supportive environment can help shift focus toward positive youth development.

From: [Wufoo](#)
To: [Janine Green](#)
Subject: HDC - Local Alcohol Policy [#40]
Date: Monday, 14 April 2025 5:00:12 PM

Name *	Nathan Cowie
Postal address *	<input type="text"/>
Email *	<input type="text"/>
Daytime phone / mobile *	<input type="text"/>
Representing organisation or business	Communities Against Alcohol Harm
Do you wish to speak to council in support of your submission (10 minute allocation slots)?	Yes
If yes - how many speakers?	1
Do you wish to give feedback in NZ sign language?	No
Do you want to give feedback in te reo Māori?	No
Preferred method:	Via conference call
Which area do you live in?	Outside of Hastings District
Do you agree or disagree with the following proposed changes:	Yes
1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?	
3. Do you agree with the one way door provision (where people can not come in after a certain time)?	Yes
Do you agree with the following changes:	Yes
4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?	
6. Reduce the closing time for entertainment venues and function centers from 2.00 am to 1.00am?	Yes
Do you agree with the following proposed changes:	Yes
1. A reduction in hours for off	

licences generally

2. Which is the most appropriate opening time for supermarkets? 10am

3. Which is the most appropriate opening time for bottle stores and cellar doors etc? 10am

4. Do you think supermarkets should have the same hours as all other off licences (ie. the same hours as bottle stores and cellar doors)? Yes

6. Which option is the most appropriate closing time for supermarkets? 9pm

7. Which option is the most appropriate closing time for all other off licences? 9pm

Do you agree with the proposed changes: Yes

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight)?

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)? Yes

1. Do you agree with the discretionary conditions generally? Yes

2. Any other comments Good intent but room for improvement of drafting

1. Do you agree with the location and density conditions generally? Yes

2. Have you submitted to the Napier LAP review process? Yes

14 April 2025



Tēnā koe,

1. Communities Against Alcohol Harm provides advice and support to local community organisations, members of the public, Māori and other stakeholders who are seeking to reduce alcohol-related harm in their communities (especially harm or potential harm arising from applications for alcohol licences).
2. Communities Against Alcohol Harm broadly supports the proposed review of the Napier Local Alcohol Policy (LAP), recognising the strong protections in place from the joint 2019 policy, commends proposed improvements, and recommends adjustments and further measures to protect communities from alcohol harm.
3. Communities Against Alcohol Harm has extensive experience supporting community objectors opposing liquor stores in District Licensing Committee hearings.

On-Licences

4. We support the proposed reduction in on-licence hours to 8am through 2am, and the one way door policy from 1am.
5. We support a reduction of closing hour for cafes, restaurants, wineries, winery restaurants. We submit that between midnight and 2am these premises are likely operating in the manner of taverns.

Off-licences

6. We support the proposed reduction in off-licence hours to 9am through 9pm.
7. Regarding the location of off-licence premises, we support efforts to protect particular areas where new liquor stores are unwanted. However, we support a broader approach be taken, protecting broad areas rather than targeting specific properties or clusters of properties. In the Auckland town of Wellsford, the LAP protected further proliferation of off-licences by use of a priority overlay around the town centre, and further protections were in place for neighbourhood centres, however a sixth off-licence was recently able to establish in a residential zoned area of Wellsford, where an existing consent allowed a retail store.

Club Licences

8. We support the licensed hours being consistent with the nature and activities of the club and do not oppose the proposed maximum hours of 8am through 1am for club licences.

Special Licences

9. We support a 2am closing time for special licences, but do not support extensions beyond these hours, and strongly oppose extensions beyond the national maximum hours of 4am closing.

Discretionary Conditions

10. We broadly support the discretionary conditions proposed for on-licences, club licences, and special licences. We also support the proposed discretionary conditions for off-licences, but wish to provide further input.

Single Sales

11. A recurring issue is that of singles sales of beers and RTD products. The Alcohol Licensing and Regulatory Authority (ARLA) has recognised that these products are favoured for immediate consumption by a single person in a single session, often in close proximity (including public

places and private vehicles) to the point of purchase. Further, ARLA has recognised that refusal to consider a single sales condition for premises, in vulnerable localities where applicants are subject to extended suitability requirements, is of considerable concern.

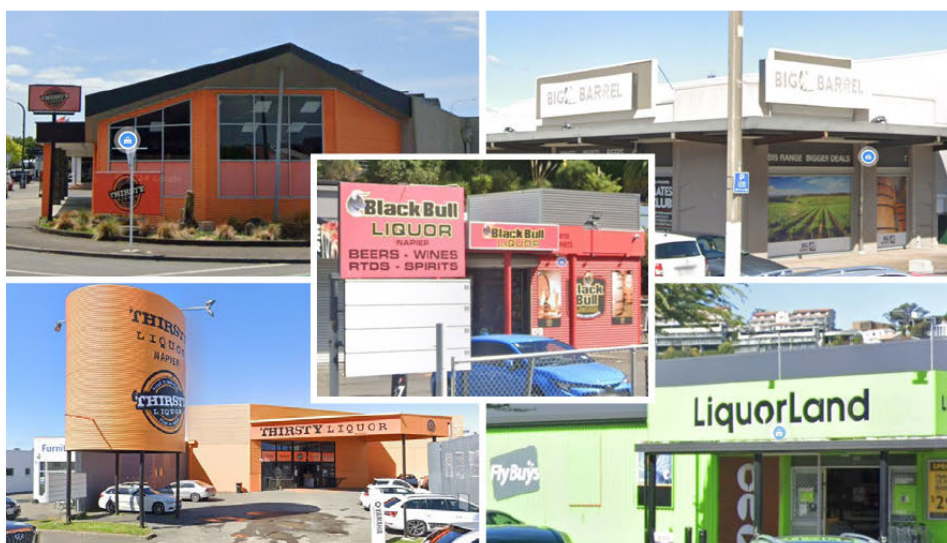
12. A further concern has been the recent emergence of high strength beer for single sales. These products are typically sold in 500ml cans, with strength ranging from 7.0% alcohol by volume (ABV) to 16% ABV. These products allow single persons to consume 2.8 to 6.5 standard drinks for a single serve in a single session for a low price. See table below:

Product name	Size	ABV%	Std drinks	Recent price
NZ Lager Strong	500ml	7.0%	2.8	\$3.79
Tui Strong	500ml	7.2%	2.8	\$4.49
Kingfisher Strong	500ml	7.2%	2.8	\$4.79
Haagen Strong	500ml	7.2%	2.8	\$4.69
Carlsberg Elephant	500ml	7.2%	2.8	\$4.99
Red Horse Extra Strong	500ml	8.0%	3.2	\$4.99
OJ Strong Beer	500ml	8.5%	3.6	\$4.99
Royal Dutch Premium Strong	500ml	8.5%	3.6	\$5.29
Royal Dutch Post Horn Super Strong	500ml	12.0%	4.7	\$7.29
El Diablo	500ml	12.0%	4.7	\$5.99
Oranjeboom Mega Strong	500ml	16.0%	6.5	\$8.99

13. We support single sales conditions that are well crafted, unambiguous, and sufficiently cover common products that are of concern, i.e. that are frequently found discarded in public places, seen being consumed in public places, and used in pre-loading and side-loading sessions.
14. We propose first amending the wording in the proposed discretionary condition, and strengthening the condition with an arm that extends the condition to cover high strength beer singles.
15. At a minimum we propose replacing “No single sale of Ready to Drink (RTD) or mainstream beer under 500ml” to read “No single sale of Ready to Drink (RTD) or mainstream beer **500ml or less**”
16. However to extend coverage to high strength beer single sales, we propose including “No single sales of beers containing 2 or more standard drinks per container are to be sold”.
17. Our experience of negotiating and contesting single sales conditions at hearings of ARLA and multiple District Licensing Committees has led us to develop a ‘current best practice’ for a single sales condition which we recommend be adopted as the discretionary condition for the LAP:
No single sales of beer, cider, spirits or RTDs priced at, or less than, \$6.00 per unit are to be sold.
No single sales of beers containing 2 or more standard drinks per container are to be sold.
External advertising and branding
18. Another recurring issue in our licensing work has been control of external advertising, of alcohol brand advertising, alcohol-related lifestyle images, and increasingly aggressive franchise branding, colour schemes and livery. We will outline detailed proposals to protect community amenity from the negative appearance of liquor stores.
19. While we support the proposed discretionary condition to limit external advertising at liquor stores to 30% of the building or glass exterior, we are concerned that such a condition would be weak if limited only to alcohol brand advertising.
20. Our extensive experience shows that restrictions on signage in bylaws and in district plans are routinely ignored by licensees, licensing committees, and territorial authority compliance officers,

despite widespread community concern regarding the obstreperous nature of advertising and signage at liquor stores, particularly in neighbourhood centres and residential settings.

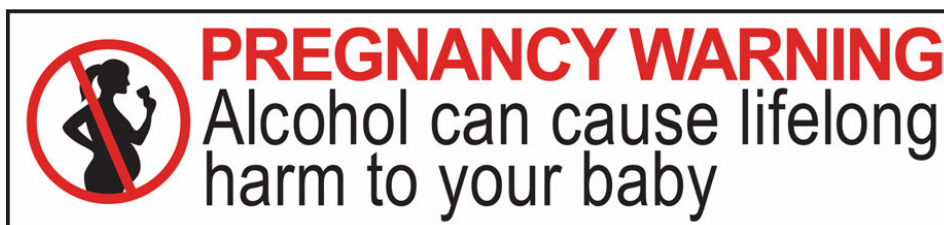
21. While alcohol brand and price advertising has been mitigated to an extent, a real concern for communities is the alcohol-related lifestyle signage, and in particular the very aggressive store branding that has developed. Franchise branding consists of the store name, the franchise name, logos and symbols, colours and livery, and signal words (e.g. Beers Wines, Spirits, RTDs). Often combined with alcohol-related lifestyle signage (e.g. vines, barrels, people socialising with alcohol, bottles on ice, wine in glasses etc.), the effect is an assault on the senses, a normalisation of alcohol, and a veneration of alcohol's place in community life.
22. We propose strengthening any discretionary condition on external advertising at liquor stores so that it provides comprehensive protection to communities. The following conditions (drawn/adapted from signs bylaws, and licence conditions) we think represents best practice in this area:
 - a. *No external or external facing alcohol product, price or alcohol-related lifestyle or brand advertising is to be displayed on the facade of the building or on any portable signs outside the premises (including not limited to flags, sandwich boards and bollard sleeves)*
 - b. *Premises identification (including store name, franchise name, logos, colours, and livery) and signal words (e.g. Beers, Wines, Spirits, RTDs) must not exceed 20% of the facade of the premises*
 - c. *Window signs to cover no more than 50% height or 50% width of window*
 - d. *Wall mounted signs to be no larger than 3 square metres, with no more than 1 wall mounted sign per 5 metres of premises frontage*
 - e. *No above veranda or roof signs*
 - f. *Maximum of 1 portable sign per premises (including flags, sandwich boards and bollard sleeves)*
23. Some examples, particularly of dominant franchise branding and livery around Napier, are below:



Display of safe drinking messages/material

24. We support the display of safe drinking messages and material in off-licence premises, so as to be easily seen and read by people using the premises. We support the display of low risk drinking guidelines and alcohol and cancer warnings.

25. We also propose, as a discretionary condition, the mandating of pregnancy warning signs at points of sale and various other locations in off-licence premises, so as to be easily seen and read by people using the premises.
26. New Zealand and Australia have mandated pregnancy warning labels on all alcohol products produced and labelled after 31 July 2023. However older stock is not required to carry the label. Further, the label itself is quite small and is usually located on the rear rather than the front of alcohol products, so as to be easily ignored by people using licensed premises.



27. We propose to *reformat the pregnancy warning label to create a pregnancy warning sign* for use in licenced premises, at point of sale, and in single alcohol areas of supermarkets and grocery stores. An easily printable, and easily readable sign could increase awareness and salience of the warnings.
28. We propose reformatting the signs to an A4 size, with a portrait and a landscape option that can easily be printed and displayed by staff at licensed premises.
29. The Sale and Supply of Alcohol Act mandates display of a range of signage *so as to be easily read by people*. These signs include trading hours (s56, at each principal entrance), the licence itself (s57, at each principal entrance, see also s150 special licences). The full name of a manager on Duty at a premises *must be prominently displayed inside the premises so as to be easily read by people using the premises* (s214).
30. We propose that display of an A4 pregnancy warning sign be made a condition of licences, particularly off-licences. We see four potential routes of this occurring, through:
- a. inclusion of discretionary conditions in Local Alcohol Policies;
 - b. licence conditions imposed by District Licensing Committees or the Alcohol Regulatory and Licensing Authority (ARLA);
 - c. practice notes issued by District Licensing Committees;
 - d. regulations developed under s401(b) of the Sale and Supply of Alcohol Act.
31. We recommend including a discretionary condition to require off-licensed premises to display of A4 pregnancy warning signs (see below) at point of sale and other prominent locations throughout the premises so as to be easily read by people using the premises.



32. The Sale and Supply of Alcohol Act allows territorial authorities to develop a local alcohol policy, allowing the issue of licences subject to discretionary conditions under s77(f). These conditions are to be imposed at the discretion of District Licensing Committees, but in turn District Licensing Committees may be expected to include conditions and give effect to policy decisions, unless there is a good reason not to do so.
33. The joint 2019 LAP already includes a number of discretionary conditions, so will introducing new discretionary conditions to protect the community is well precededented.
34. We would welcome the opportunity to support our submission with an oral presentation.

Noho ora mai,

Nathan Cowie



#41

LOCAL ALCOHOL POLICY SUBMISSION FORM 2025



Personal details

First Name: JessieSurname: moir
Daytime phone/mobile:

Representing organisation or business:

Hearing details

Do you wish to speak to council in support of your submission (10 minute allocation slots) ☐ Y ☒ NIf yes – how many speakers Do you wish to give feedback in NZ sign Language? ☐ Y ☐ NDo you want to give feedback in Maori? ☐ Y ☐ NPreferred method: ☐ In person at the council ☐ Via conference callWhich area do you live in: ☐ Flaxmere ☐ Havelock North ☐ Hastings residential ☐ Rural ☐ Other

Submission questions

On Licences - Closing hours:

Do you agree or disagree with the following proposed changes:

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs? ☐ Y ☒ N
2. If no, which option is the most appropriate closing time: ☒ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☐ 4am
3. Do you agree with the one way door provision (where people can not come in after a certain time) ☒ Y ☐ N

Do you agree with the following changes:

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2am to 1am? ☐ Y ☒ N
5. If no, which option is the most appropriate closing time: earlier than ☒ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☐ 4am
6. Reduce the closing time for Entertainment venues and function centers from 2am to 1am? ☐ Y ☒ N
7. If no, which option is the most appropriate closing time: ☒ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☐ 4am

8. Any other comments:

Off Licences: Hours generally:

Do you agree with the following proposed changes:

1. A reduction in hours for off licences generally ☒ Y ☐ N

PG 1 OF 2

LOCAL ALCOHOL POLICY SUBMISSION FORM 2025

Off Licences: Opening hours:

2. Which is the most appropriate opening time for supermarkets? ☐ 7am ☐ 8am ☐ 9am ☒ 10am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc? ☐ 7am ☐ 8am ☐ 9am ☒ 10am
4. Do you think supermarkets should have the same hours as all other off licences (ie. The same hours as bottle stores and cellar doors)? ☒ Y ☐ N

5. Any other comments: *For the supermarkets, I am ticking 10am as the time they can start selling alcohol, not for opening the supermarket.*

Off Licences: Closing hours:

6. Which option is the most appropriate closing time for supermarkets: ☒ 8pm ☐ 9pm ☐ 10pm ☐ 11pm
7. Which option is the most appropriate closing time for all other off licences: ☒ 8pm ☐ 9pm ☐ 10pm ☐ 11pm

8. Any other comments: *As above for supermarkets. i.e. can't sell alcohol after 8pm but the supermarket can still be open.*

Club Licences

Do you agree with the proposed changes:

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight) ☐ Y ☒ N
2. If no, which option is the most appropriate closing time: earlier than ☒ 9pm ☐ 10pm ☐ 11pm ☐ 12am ☐ 1am ☐ 2am
3. Any other comments:

Special Licences

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences) ☐ Y ☐ N
2. Any other comments:

Discretionary Conditions

Do you agree with the discretionary conditions generally? ☐ Y ☐ N

Any other comments:

Location and density restrictions

Do you agree with the location and density conditions generally? ☐ Y ☐ N

Any other comments:

Final Questions

1. Any other comments about any other provisions within the LAP?

I am advocating a tough line on availability of alcohol because alcohol is causing so much harm in our society.

2. Have you submitted to the Napier LAP review process? ☐ Y ☐ N

**HERETAUNGA
HASTINGS** DISTRICT COUNCIL

hastingsdc.govt.nz
06 871 5000



Thank you for
your feedback, we
appreciate your
time

PG 2 OF 2

#42

LOCAL ALCOHOL POLICY SUBMISSION FORM 2025



Personal details

First Name: Hayley

Surname: Hansen

Postal address: 4110

Email: [REDACTED]

Daytime: [REDACTED]

Representing organisation or business: None

Hearing details

Do you wish to speak to council in support of your submission (10 minute allocation slots) ☐ Y ☒ N

If yes – how many speakers

Do you wish to give feedback in NZ sign Language? ☐ Y ☒ N

Do you want to give feedback in Maori? ☐ Y ☒ N

Preferred method: ☐ In person at the council ☒ Via conference call

Which area do you live in: ☐ Flaxmere ☐ Havelock North ☒ Hastings residential ☐ Rural ☐ Other

Submission questions

On Licences - Closing hours:

Do you agree or disagree with the following proposed changes:

- Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs? ☒ Y ☒ N *HH*
- If no, which option is the most appropriate closing time: ☐ 11 pm ☐ 12am ☐ 1am ☒ 2am ☐ 3am ☒ 4am *HH*
- Do you agree with the one way door provision (where people can not come in after a certain time) ☒ Y ☐ N

Do you agree with the following changes:

- Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2am to 1am? ☐ Y ☒ N
- If no, which option is the most appropriate closing time: earlier than ☐ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☒ 4am
- Reduce the closing time for Entertainment venues and function centers from 2am to 1am? ☐ Y ☒ N
- If no, which option is the most appropriate closing time: ☐ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☒ 4am

8. Any other comments:

Off Licences: Hours generally:

Do you agree with the following proposed changes:

- A reduction in hours for off licences generally ☒ Y ☐ N

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LOCAL ALCOHOL POLICY SUBMISSION FORM 2025

Off Licences: Opening hours:

2. Which is the most appropriate opening time for supermarkets? ☒ 7am ☐ 8am ☐ 9am ☐ 10am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc? ☒ 7am ☐ 8am ☐ 9am ☐ 10am
4. Do you think supermarkets should have the same hours as all other off licences (ie. The same hours as bottle stores and cellar doors)? ☐ Y ☒ N

5. Any other comments:

Off Licences: Closing hours:

6. Which option is the most appropriate closing time for supermarkets: ☐ 8pm ☐ 9pm ☐ 10pm ☒ 11pm
7. Which option is the most appropriate closing time for all other off licences: ☐ 8pm ☐ 9pm ☐ 10pm ☒ 11pm

8. Any other comments:

Club Licences

Do you agree with the proposed changes:

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight) ☒ Y ☐ N
2. If no, which option is the most appropriate closing time: earlier than ☐ 9pm ☐ 10pm ☐ 11pm ☒ 12am ☐ 1am ☐ 2am

3. Any other comments:

Special Licences

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences) ☐ Y ☒ N

2. Any other comments:

Discretionary Conditions

Do you agree with the discretionary conditions generally? ☒ Y ☐ N

Any other comments:

Location and density restrictions

Do you agree with the location and density conditions generally? ☒ Y ☐ N

Any other comments:

Final Questions

1. Any other comments about any other provisions within the LAP?

2. Have you submitted to the Napier LAP review process? ☐ Y ☒ N

**HERETAUNGA
HASTINGS** DISTRICT COUNCIL

hastingsdc.govt.nz
06 871 5000

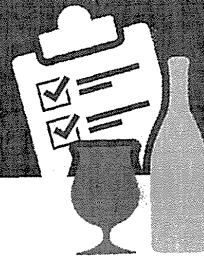


Thank you for
your feedback, we
appreciate your
time

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#43

LOCAL ALCOHOL POLICY SUBMISSION FORM 2025



Personal details

First Name: Rachael Gresham

Surname: Gresham

Hearing details

Do you wish to speak to council in support of your submission (10 minute allocation slots) ☐ Y ☐ N

If yes -

Do you wish to give feedback in NZ sign Language? ☐ Y ☒ N

Do you want to give feedback in Maori? ☐ Y ☒ N

Preferred method: ☒ In person at the council ☐ Via conference call

Which area do you live in: ☐ Flaxmere ☐ Havelock North ☐ Hastings residential ☒ Rural ☐ Other

*If you want
me to. Otherwise
no.*

Submission questions

On Licences - Closing hours:

Do you agree or disagree with the following proposed changes:

- Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs? ☐ Y ☐ N
- If no, which option is the most appropriate closing time: ☐ 11 pm ☐ 12am ☒ 1am ☐ 2am ☐ 3am ☐ 4am
- Do you agree with the one way door provision (where people can not come in after a certain time) ☒ Y ☐ N

Do you agree with the following changes:

- Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2am to 1am? ☒ Y ☐ N
- If no, which option is the most appropriate closing time: earlier than ☐ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☐ 4am
- Reduce the closing time for Entertainment venues and function centers from 2am to 1am? ☒ Y ☐ N
- If no, which option is the most appropriate closing time: ☐ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☐ 4am

8. Any other comments:

See attached.

Off Licences: Hours generally:

Do you agree with the following proposed changes:

- A reduction in hours for off licences generally ☐ Y ☐ N

PG 1 OF 2

LOCAL ALCOHOL POLICY SUBMISSION FORM 2025

Off Licences: Opening hours:

2. Which is the most appropriate opening time for supermarkets? ☐ 7am ☐ 8am ☐ 9am ☐ 10am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc? ☐ 7am ☐ 8am ☐ 9am ☐ 10am
4. Do you think supermarkets should have the same hours as all other off licences (ie. The same hours as bottle stores and cellar doors)? ☐ Y ☐ N

5. Any other comments:

Off Licences: Closing hours:

6. Which option is the most appropriate closing time for supermarkets? ☐ 8pm ☒ 9pm ☐ 10pm ☐ 11pm
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Club Licences

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Special Licences

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences) ☐ Y ☐ N

2. Any other comments:

Discretionary Conditions

Do you agree with the discretionary conditions generally? ☐ Y ☐ N

Any other comments:

Location and density restrictions

Do you agree with the location and density conditions generally? ☐ Y ☐ N

Any other comments:

Final Questions

1. Any other comments about any other provisions within the LAP?

2. Have you submitted to the Napier LAP review process? ☐ Y ☐ N

**HERETAUNGA
HASTINGS**
DISTRICT COUNCIL

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Thank you for
your feedback, we
appreciate your
time

PG 2 OF 2

I believe the current framework does not look after the young people in our community.

The current drinking behaviour of a lot of young people in Hawke's Bay is to drink alcohol from around 5pm - 6pm at a home/flat until around 10.30 - 11.00pm. At this point they move to a pub of choice where they will continue to drink alcohol until 3am.

This pattern is because they can't afford to be at the pub for 8 hours.
An event that starts around 6pm and is allowed to continue into the early hours of the morning is just as bad, maybe worse, as people do not have a break from drinking and instead are exposed to continuous consumption.

THIS IS FAR TOO LONG

Nothing good happens when anyone, particularly young people, drink alcohol for this length of time.

Good people (region wide) are making dumb decisions because they are drinking alcohol over too many hours.

The reality is people are not productive the next day. Disregarding weekdays, if someone drinks until 3am on a Saturday or Sunday, how are they expected to get up at a reasonable hour the same day and be a fully functioning member of the community?

Too many families are struggling with all sorts of issues these days without having to deal with the attitudes of young people who have been drinking until 3am, issues of mental health created by excessive drinking and depression caused by poor decision-making which someone has documented on social media.

The 3am finish perpetuates irresponsible behaviour and does not provide for our young people's health.

Closing time should be 1am at the latest. Frankly, I think it should be midnight.

People will still go to drinking establishments because this is the nature of young people who want to meet friends and partners and they will probably end up spending more money in these same places as they will spend less on drinking at private residences. They will go earlier to the pubs as they won't want to cut themselves short of socialising time.

Most importantly, they won't be exposed/encouraged to drink for hours on end and will get to bed earlier. Less of them will make stupid decisions and more of them will function productively in our communities after a better night's sleep.

R. Foster.

#44

Penny Hough

From: Brent Eccles <brent@eccles.co.nz>
Sent: Wednesday, 2 April 2025 10:16 AM
To: Customer Service (External)
Cc: [REDACTED]
Subject: [REDACTED] Alcohol Policy for Special Licences

To Whom It may Concern,

Well this would do it for me. No more concerts coming to Hastings.
Why would I put myself through this?

Special Licences have gotten right out of control.
With the Tri-agencies not seemly having to report to no-one, these rules are being made with consultation.

I dont believe you can make rules this severe when it comes to kiwis.
What ever happened to personal responsibility?

Do you believe Kiwis should not be able to buy drinks for their mates?
You are making this sound like alcohol is bad for you and naughty and maybe illegal.
If you do, say so. See how that goes with the voters of Aotearoa.

I believe you are wrong and there is a masseive double standard going on here.
You have an "Alcohol Harm" group. Do you also have an "Alcohol Good" group?

I believe that this proposal should be bought into the public arena and I will do that if it gains traction.

I really hope common sense prevails and energy can be better spend on other issues in our society.

Please feel free to contact me at any time. You can tell I am passionate about this.

Brent H L Eccles - Promoter & Owner Eccles Entertainment Ltd.

[REDACTED]

■
Brent Eccles
Adult In Charge
[REDACTED]
[REDACTED]
[REDACTED]

#45

Submission to the Hastings District Council Local Alcohol Policy Changes

From: Hawkes Bay Tourism Industry Association (HBTIA) Board

Date: Monday 14 April 2025

About Hawke's Bay Tourism Industry Association

The Hawke's Bay Tourism Industry Association (HBTIA) is a non-profit membership organisation and wholly owns Hawke's Bay Tourism. We currently comprise 144 full members across a diverse group of organisations including tourism operators, accommodation providers, retail, event organisers and hospitality providers across the broader Hawke's Bay region.

General Comments

We appreciate the decision made by Napier and Hastings Councils in 2013 to collaborate on the LAP to enhance consistency. While we recognise that the councils are consulting on their own LAPs separately, it is essential for us to stress the importance of consistency between the two. Inconsistencies in policy can lead to confusion among both residents and visitors and can negatively impact the seamless experience that we strive to provide in Hawke's Bay. A unified approach will ensure that the region is perceived as a cohesive and well-coordinated destination, which is essential for maintaining our reputation and attracting visitors.

Having consistent policies across both councils will also help avoid any potential discrepancies that could arise from differing regulations. This consistency is particularly important for businesses and event organisers who operate across both Hastings and Napier, as it will simplify compliance and reduce administrative burdens.

Hawke's Bay is renowned as New Zealand's food and wine country and is one of the Great Wine Capitals of the World. Any changes to the LAP must take into consideration the unique positioning of our region. The food and wine industry is a significant driver of tourism and economic growth in Hawke's Bay. Policies that negatively impact this sector could have far-reaching consequences for our local economy.

It is essential that any policy changes support and enhance our reputation as a premier food and wine destination, rather than hinder it. Any reduction in operating hours for licensed premises could reduce our appeal to visitors, who come to experience the vibrant food and wine culture that Hawke's Bay offers. The hospitality sector, which includes restaurants, bars, and wineries, relies heavily on the flexibility of operating hours to cater to both locals and tourists. Restricting these hours could result in a less attractive destination, ultimately impacting the overall visitor experience and satisfaction.

Additionally, the economic benefits derived from tourism are substantial, contributing significantly to the local economy. A decrease in visitor spend would not only affect the hospitality industry but also have

a ripple effect on other sectors such as retail, accommodation, and transportation. It is crucial that the LAP changes are made with a comprehensive understanding of their potential impact on the tourism industry and the broader economic landscape of Hawke's Bay.

Feedback on Discretionary Conditions

The proposed changes around serve reduction systems will have a detrimental impact on the events industry in Hawke's Bay. Events such as food and wine festivals, concerts, and other large gatherings are vital to our tourism sector, drawing visitors from across the country. Serve reduction systems could lead to lower satisfaction among event-goers, ultimately impacting on the regions reputation of hosting quality events and reduce the economic benefits that these events bring to our region. Additionally, the implementation of such systems could increase operational costs for event organisers, making it more challenging to host successful events.

We specifically disagree with the following proposed changes:

1. **Requirement of a separate line or service area for non-alcoholic beverages where the special licence is likely to have patrons that are under the legal drinking age:** This requirement could create logistical challenges for event organisers, leading to increased costs and complexity in event planning.
2. **Serve reduction systems in place to manage intoxication levels – maximum serves of 2 per sale reducing to 1:** This change could significantly impact the visitor experience at events. Limiting the number of serves per sale may lead to frustration among attendees, who come to enjoy the food and wine offerings that Hawke's Bay is known for. It could also result in decreased sales for vendors, negatively affecting the economic benefits of events.

We urge the council to consider these factors and work with industry stakeholders to find a balanced approach that supports both public safety and the vitality of our events industry. It is essential to ensure that any policy changes do not hinder the ability of Hawke's Bay to host successful and economically beneficial events.

Conclusion

In conclusion, the Hawkes Bay Tourism Industry Association strongly advocates for a consistent and supportive LAP that aligns with the unique needs and strengths of our region. We believe that by working together, we can create a policy that promotes public safety while also fostering economic growth and maintaining Hawke's Bay's status as a leading food and wine destination.

On behalf of our members, we thank the Hastings District Council for the opportunity to provide input into the consultation. We do not wish to speak to our submission.

SUBMITTER:

Kristine Larner (Chair)

Hawke's Bay Tourism Industry Association Inc. Board

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

#46



14 April 2025

Kia Ora,

Local Alcohol Policy Review

Hawke's Bay's positioning is as New Zealand's Food and Wine Country. This differentiates our region from 29 other regions throughout the country competing for visitor spend.

Food and Wine Country is underpinned by our recent (2023) admittance into the global network of Great Wine Capitals of the world.

We would like the following to be taken into consideration during the review:

- **Please work to align policy decisions across Hawke's Bay Councils**
 - Our region is promoted as Hawke's Bay. Visitors may not have an understanding that Napier Council is different to that of Hastings District within our small region, especially if regulations are different between the two.
- **Please work to protect Hawke's Bay's brand positioning**
 - Our Food and Wine Country positioning and our Great Wine Capital status are vital to the promotion of the region. Any significant dilution or restriction of the food and wine/beverage-related experience could be detrimental to our brand reputation.

Hawke's Bay Tourism is the official Regional Tourism Organisation (RTO) for Hawke's Bay, and covers Central Hawke's Bay, Hastings District, Napier City, and Wairoa District. Hawke's Bay Tourism is responsible for the tourism marketing and promotion of Hawke's Bay. We are a Membership based, not for profit organisation that aims to promote and co-ordinate opportunities for economic growth and prosperity for the visitor industry in Hawke's Bay.

Ngā mihi,

Hamish Saxton
CEO, Hawke's Bay Tourism

[Redacted signature block]



#47

14 April 2025

Hastings District Council
207 Lyndon Road East
Hastings 4122



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

Consultation and feedback

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

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

Who we are

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

With the exception of those in licensing trust areas (there are none in Hawke's Bay), all Foodstuffs supermarkets hold alcohol off-licences. And most Foodstuffs grocery stores also have off-licences.

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

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

Foodstuffs' stores in the Hastings District are:

- PAK'nSAVE Hastings
- New World Hastings
- New World Havelock North
- Four Square Cape View
- Four Square Clive
- Four Square Frimley

1



- Four Square Mahora
- Four Square Te Mata

We may also develop other stores in the Hastings District in the future, to support growth and community needs.

How we ensure our stores are responsible retailers of alcohol

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

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

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

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

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

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

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

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

If there was to be any failure (whether uncovered by our internal programme, a Police controlled purchase operation, or otherwise), Foodstuffs can require that the store carry out additional training programmes, and Foodstuffs can also impose heavy penalties. These may include fines and referring repeat offenders to our Board of Directors, which can result in a store owner's franchise agreement with Foodstuffs being terminated.



Due to the seriousness of the consequences of any alcohol compliance failure, and the need to protect the community from unauthorised sales, our store owners are vigilant in ensuring that the Act is adhered to, in particular, the prohibitions on supply to minors and intoxicated persons.

Additional safety factors applying to our stores

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

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

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

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

Our feedback on the DLAP

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

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

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

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

Off-licence conditions focus area one: Maximum trading hours

The existing Hastings District Council and Napier City Council Joint Local Alcohol Policy (JLAP) allows maximum trading hours for grocery stores and supermarkets of 7:00am to 10:00pm from Monday to Sunday.



The maximum morning opening hour for grocery stores and supermarkets (7am) is earlier than for other types of off-licensed premises, such as bottle shops. The JLAP expressly recognises that, unlike for bottle shops and the other types of off-licensed premises, the sale of alcohol is not the main business of grocery stores and supermarkets. Their main business is the sale of food and general groceries. The JLAP sensibly stated that permitting a 7am opening time allows customers to carry out their regular grocery shopping in the morning. For a number of customers this is not just a matter of convenience, it is because of work or childcare and other family commitments.

Consequently, from Monday to Friday all of our Hastings District grocery stores and supermarkets *open* at 7am in the morning. On weekends, our Four Square stores open between 7am and 8am and our PAK'nSAVE and New World stores open at 7am. These opening hours reflect customers' shopping needs.

However, the DLAP proposes a significant reduction to the available morning hours. The proposal is to change the maximum morning opening hour for grocery stores and supermarkets to 9am.

At the other end of the day, there are customers who value the option to do their family shopping quite late. Again, this is often not just a matter of convenience or because they like to shop when the store is quieter. Some customers, at least sometimes, are not able to shop until quite late because of other commitments earlier. As a result, PAK'nSAVE Hastings, New World Havelock North and New World Hastings have *closing* times of 9pm. Our other off-licensed stores close between 7pm and 8pm. Sometimes our customers are still completing their purchases at closing time, so that the store in fact finishes processing transactions and shuts a little later. That can therefore be shortly *after* 9pm in the supermarkets.

We consider that the maximum off-licence trading hours for supermarkets and grocery stores under the current JLAP should be retained. It is clear that our stores have been able to sell alcohol safely and responsibly during those hours. And we have not seen any evidence that our stores being open before 9am or sometimes until a little after 9pm is the cause of any alcohol-related harm as defined in the Act (being harm caused by the *excessive or inappropriate consumption* of alcohol).

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

In relation to the proposal for a 9am maximum opening time, the Issues and Options paper does not provide any supporting evidence from the Hastings District or even the wider Hawke's Bay. The academic opinion referred to is, when read correctly, largely related to the effect of *on*-licence trading hours. This makes sense, since on-licence alcohol can only be consumed when the bar, club, tavern or restaurant is trading. By contrast, alcohol purchased from off-licensed premises can be consumed at any time later. So, while reductions in off-licensed trading hours will



certainly inconvenience or prejudice responsible shoppers, they cannot stop irresponsible drinkers consuming alcohol inappropriately or to excess.

Importantly, the 'availability theory' relied on in the Issues and Options paper was the basis for Auckland Council proposing a 9am maximum morning opening time for off-licensed premises in its region. However, when the Alcohol Regulatory and Licensing Authority considered the appeal of Auckland City Council's draft local alcohol policy it held that bringing in a 9am maximum trading hour restriction was *not* reasonable. Even after the case went to the High Court, the Court of Appeal, and the Supreme Court, that ruling remained. Auckland Council's maximum morning hour is still 7am.

As noted above, we are not aware of any specific issue with sales of alcohol from our grocery stores and supermarkets in the Hastings District between 7am and 9am in the morning. Without any such specific issue, it would be unreasonable to impose a 9am maximum time – just as the Authority held it would have been unreasonable in Auckland.

Of course, the relevant consideration is not whether *some* alcohol purchased from supermarkets or grocery stores may be later consumed to excess or inappropriately. And the proposed policy cannot reasonably be justified by simply saying that reduced trading hours might lead to reduced *overall* alcohol sales and therefore consumption. As the Minister's speech quoted above shows, the Act does not have any object of reducing *overall* sales or consumption of alcohol.

On the contrary, it would only be reasonable to prohibit the sale of alcohol from supermarkets and grocery stores *after 9pm* (but before 10pm) if there was evidence that such sales at those times *as opposed to at other times* leads to alcohol-related harm. We do not consider there is evidence to that effect. We note that the Issues and Options paper cites research that the heaviest drinkers purchase their alcohol later. But that research related to purchases *after 10pm*, not *after 9pm*. The Issues and Options paper, also gives data relating to Alcohol Related ED Presentations by Hour of Day and Hastings District alcohol related incidences by time of day. However, while this data correlates with the ordinary flow of daily activity, and with the hours of *on-licensed* venues, it does not show any connection with the *time* of purchases from off-licensed premises, and certainly not from grocery stores and supermarkets.

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

In relation to the need for flexibility, the Hastings District is of course a premier destination for tourists and holiday-makers, from other parts of New Zealand but also from around the World. In the absence of evidence of actual issues from sales of alcohol by our stores after 9pm, we consider that the more flexible maximum trading hours provided in the existing JLAP are appropriate and should be retained.

We propose that, at a minimum, the latest time for alcohol sales from supermarkets and grocery stores should be at least 9:15pm, to allow those customers who are in the process of finishing and paying for their groceries to lawfully do so. This would avoid circumstances in which customers, who might well be tourists, would be inconvenienced and can become frustrated by a strict application of the 9pm limit for the sale and supply of alcohol.

We note that such an extension would also help ensure the safety of the staff of Foodstuffs stores and customers from those who may be angered by a refusal to sell and supply them alcohol strictly at 9pm.

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

Guidance on discretionary conditions

Foodstuffs is not opposed to guidance being provided by the Council in the DLAP with respect to imposition of discretionary conditions. However, in our view, the guidance should be amended.

Discretionary conditions can only be imposed where they are 'reasonable'. The guidance in the DLAP should reflect the correct legal position as to what is reasonable in the context of the Act, as stated by the High Court.¹ In particular, 'the requirement of reasonableness invokes concepts of proportionality. There must be a sufficient connection between the condition the relevant body wishes to impose and the risk it seeks to guard against.'² And the costs and effects on responsible sellers and customers must not outweigh any likely benefit from a proposed condition. It is therefore not correct for the guidance to suggest, as it does currently, that the requirement of reasonableness is simply 'whether it is within the capabilities of the applicant or licensee to satisfy this condition'.

Therefore, we propose that guidance given in the LAP with respect to whether a discretionary condition is reasonable should be as follows:

'The proposed condition will be reasonable only if, on an objective assessment, the condition is a proportionate response to an identified risk, which the decision maker seeks to avoid, or an identified benefit, which the decision maker seeks to obtain.'

Aisle ends

We do not consider that the DLAP should suggest a discretionary condition prohibiting aisle end displays of alcohol. That would wrongly give the impression that such displays are somehow inherently objectionable. This view has been rejected by the High Court³.

Supermarkets and grocery stores are already limited, by the Act, to the display and promotion of alcohol in only one single area within their premises. The area must be determined by the District Licensing Committee having regard to the purpose of limiting, so far as is reasonably practicable, the exposure of shoppers to alcohol displays. The High Court confirmed that 'the statutory purpose of limiting, so far as is reasonably practicable, the exposure of shoppers to displays and promotions of alcohol is achieved by the enactment of ss 112 to 114' of the Act.⁴ Parliament did not legislate against the use of aisle ends inside a store's single alcohol area.

Furthermore, the Act's object in section 4 has two limbs – that the sale, supply and consumption of alcohol should be undertaken safely and responsibly; and that the harm caused by the *excessive or inappropriate* consumption of alcohol should be minimised. As noted above, it is not an object of the Act to simply reduce sales of alcohol generally.

Single sales

We appreciate of course that whether or not any particular condition is imposed on a licence is always a matter for the District Licensing Committee in its discretion – subject to the section 117

¹ *Vaudrey & Bond* [2016] 2 NZLR 382 at [59(h)]

² *Vaudrey & Bond*, above n1, at [101]

³ *Medical Officer of Health (for the Manawatu District) v G & B Hasler* [2018] NZHC 1208

⁴ *Medical Officer of Health (for the Manawatu District) v G & B Hasler*, above n 3, at [71]



requirements that there must be no conditions that are inconsistent with the Act or otherwise unreasonable.

From their knowledge of their customers, our stores consider that proposing a discretionary condition prohibiting the sale of single units of mainstream beer with a volume of less than 500ml would be unreasonable. This would remove one valuable option for customers who are looking to manage their alcohol spending or consumption. Such a condition could have the unintended consequence of leading to customers purchasing and then consuming more alcohol than they actually wished to. Customers may divert resources away from other things to buy a multipack of beer when they would otherwise have purchased just a single can – perhaps to drink with dinner or while watching a game. There is also a risk of increasing crime if the effect of the condition would be to increase the amount of money required for a purchase.

There is nothing intrinsically of greater risk in buying a single beer than buying a multipack, such as a dozen. Obviously, a single beer contains much less total alcohol. In fact, in mainstream beers less than 500ml will be within the guidelines for less risky drinking. Furthermore, the Act already provides limits on the types of alcohol which can be sold in grocery stores and supermarkets, as noted above. Also, the proposed condition takes no account of low and very low alcohol products. And the proposed condition would be uncertain in its application. The meaning of 'mainstream beer' would be subject to debate. Such debates are of course wasteful of time and resources in District Licensing Committee proceedings.

Incidents register

Our stores are happy to continue to maintain incidents registers.

However, in the legal proceedings over Auckland Council's LAP, the High Court determined that the Act did not permit a council to impose a policy which specifies the information to be provided by the applicant in the process of making a licence application. The Court determined that such a policy was *ultra vires*, being outside the Council's power under section 77 of the Act. That decision was not changed by the Court of Appeal or the Supreme Court and the proposed policy was removed from Auckland Council's LAP. Of course, although there is no longer a right of appeal against elements of a LAP, they are still required to comply with the law and the right to judicial review remains.

Therefore, an applicant cannot be required to supply an incident register as a part of the application process. Accordingly the proposed condition to that effect in the DLAP should be removed.

Impact assessments

The DLAP includes a discretionary condition which requires 'impact assessments by an applicant if a premises is in a particularly low socio-economic area or an area known to have issues.' It is not clear what is intended by this. The wording is ambiguous and likely to lead to unnecessary confusion and therefore its inclusion in the LAP would not be supported.

Furthermore, although it is not clear when the impact assessment would need to be provided, as noted above, requiring certain information to be provided *in an application process* is *ultra vires*. The same would be the case if what is intended is that 'impact assessments' would be required to be provided at some other time. Section 77 of the Act does not permit a council policy on what information is to be provided.

Thank you

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



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

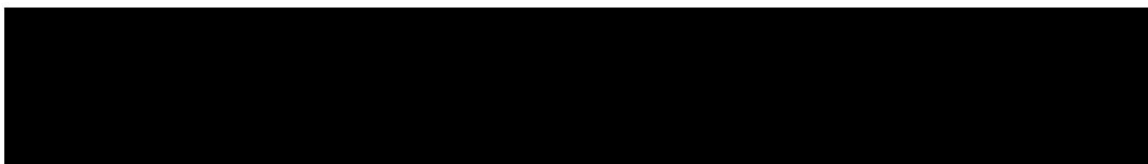
And we would welcome the opportunity to present our submission to the Council in its hearing, which we understand is scheduled for 16 and 17 April 2025.

Kind regards,

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

Julian Benefield
General Counsel and Company Secretary

foodstuffs NORTH ISLAND



#48



14 April 2025

Local Alcohol Policy Submission
Hastings District Council
Private Bag 9002
HASTINGS

By email: customerservice@hdc.govt.nz

SUBMISSION ON THE HASTINGS DISTRICT COUNCIL DRAFT LOCAL ALCOHOL POLICY

Summary

1. As an off-licence holder in Hastings, General Distributors Limited ("GDL") welcomes the opportunity to submit on the Hastings Draft Local Alcohol Policy ("DLAP").
2. GDL supports the objectives of minimising alcohol-related harm in the district and the general use of local alcohol policies. In particular, GDL supports the distinction made between types of off-licences in Policy 4.0 of the DLAP such that it does not restrict the issue of further off-licences for supermarkets and grocery stores (only bottle stores).
3. However, GDL:
 - (a) Opposes Policy 3.2 of the DLAP to reduce maximum off-licence trading hours for off-licences to Monday to Sunday from 9am to 9pm. GDL does not consider Hastings District Council has provided sufficient evidence to justify this restriction. GDL seeks the off-licence hours in the current Local Alcohol Policy ("LAP") of 7am to 10pm be retained for supermarkets and grocery stores.
 - (b) Seeks amendments to Policy 5.0 to ensure the correct legal test under the Sale and Supply of Alcohol Act 2012 ("Act") for imposing discretionary conditions for off-licences is followed by decision-makers considering whether to impose such conditions on a particular licence.
4. GDL wishes to be heard in relation to this submission.

GDL as an off-licence holder

5. GDL is a wholly owned subsidiary of Woolworths and is responsible for operating Woolworths stores nationwide. GDL owns and operates 190 supermarkets under the Woolworths (formally operating as Countdown supermarkets) and Metro banners, and 4 "eStores" across New Zealand. Another subsidiary of Woolworths, Wholesale Distributors Limited, is the franchisor for over 70 SuperValue and FreshChoice supermarkets, which are locally owned and operated businesses.
6. As a holder of over 175 off-licences in New Zealand, GDL is an experienced licence holder and is committed to being a responsible retailer of alcohol. GDL acknowledges that it has a shared responsibility to prevent alcohol-related harm and ensure that consumption of alcohol is undertaken safely and responsibly.
7. GDL holds one off-licence in the Hastings District for Woolworths Hastings. The current opening hours and trading hours are Monday to Sunday from 7am to 10pm.

3465-2214-6360

1

Location of licensed premises – Policy 4.0

8. Policy 4.0 of the DLAP retains the wording of the LAP, which provides that no further off-licences for bottle stores only are to be issued for premises within the Flaxmere and Camberley areas, as identified in the Hastings District Plan.¹
9. This restriction does not apply to off-licences for supermarkets or grocery stores. GDL supports that approach and the exclusion of supermarkets and grocery stores from Policy 4.0. GDL considers this is appropriate due to the differences in these types of off-licences, including the principal purpose of the business, types of alcohol sold, and shopping experience for customers (eg supermarkets can only sell beer, wine and mead, and offer a range of other household goods).

Relief sought

10. GDL seeks that Policy 4.0 as drafted is retained as proposed in the DLAP.

Reduction in maximum trading hours – Policy 3.2

11. The current LAP limits trading hours to Monday to Sunday from 7am to 10pm. Policy 3.2 of the DLAP proposes reducing the maximum off-licence trading hours to 9am to 9pm.²
12. The proposed reduction in trading hours will impact GDL's operations by reducing trading hours at Woolworths Hastings by three hours per day. GDL is concerned this will cause disruption and inconvenience to customers carrying out their shopping, including shift workers who may carry out their shopping both early in the morning and later at night. The Supreme Court has acknowledged shopper convenience may be material to the assessment of whether a restriction in a LAP is unreasonable considering the object of the Act.³
13. GDL does not consider the proposed reduction in trading hours for supermarkets and grocery stores is sufficiently supported by evidence. Council cites a study showing the peak period of alcohol-related harm occurs in the early morning and late evening (12am to 2.59am).⁴ In any case, as outlined in the cited studies, this time period likely correlates with the tail end of social gatherings, bars closing, and heightened alcohol consumption.⁵ The studies cited by Council do not specify to what degree, if at all, off-licensed premises contribute towards an increase in alcohol-related incidents. GDL considers the amendments proposed by the Council in the DLAP places an unreasonable restriction on responsible off-licence operators, such as GDL. GDL considers that further evidence is required to justify reduced trading hours for supermarkets and grocery stores under the DLAP.
14. GDL also considers the evidence cited by Council does not justify a later opening time (from 9am) as proposed under the DLAP. In both studies cited by Council, there is no indication of an increase in alcohol-related incidences in the mornings, rather, this is when alcohol-related incidences are at their lowest (on average) during a 24-hour period.⁶ GDL is concerned the proposed change in trading hours for supermarkets and grocery stores will be ineffective at reducing alcohol-related harm and instead will unfairly inconvenience customers who shop early in the morning.

¹ DLAP, Policy 4.0.

² DLAP, Policy 3.2.

³ *Woolworths New Zealand Ltd v Auckland Council* [2023] NZSC 45, [2023] 1 NZLR 113 at [85].

⁴ Hastings District Council Draft Local Alcohol Policy: Issues and Options Paper 2024 at [2.5.5].

⁵ Hastings District Council Draft Local Alcohol Policy: Issues and Options Paper 2024 at [2.5.5].

⁶ Hastings District Council Draft Local Alcohol Policy: Issues and Options Paper 2024 at [2.5.3] and [2.5.8].

Relief sought

15. GDL seeks Policy 3.2 of the DLAP be amended to retain the maximum trading hours in the current LAP as follows (amendments are shown in red underline and deletions are shown in red ~~strikethrough~~):

3.2 Off-Licence Hours

Maximum Trading Hours

~~97~~.00am to 910.00pm Monday to Sunday

[...]

Additional discretionary conditions for off-licences – Policy 5.0

16. Policy 5.0 of the DLAP provides a list of additional discretionary conditions that may be applied to off-licences, with the aim of providing DLCs with further options to "alleviate issues with amenity and good order, as well as the reducing alcohol-related harm."⁷
17. GDL acknowledges Policy 5.0 refers to section 117 of the Act and seeks to provide guidance regarding how discretionary conditions are to be imposed under the Act. However, GDL considers the guidance on the imposition of these discretionary conditions needs to be expanded to align with the legal test for how discretionary conditions under section 117 of the Act are applied, as well as the relevant case law. Whether a discretionary condition meets section 117 is a fact-specific assessment to be weighed against considerations relevant to the application at hand.⁸ Reasonableness depends on an objective assessment of whether there is a rational and proportionate connection between an identified risk to be abated or benefit to be sought when weighed against all the relevant considerations.⁹
18. One of the proposed discretionary conditions in Policy 5.0 states "no single sales of RTDs or mainstream beer under 500ml". GDL has not stocked single cans of high-strength mainstream beer in any of its Woolworths stores since October 2023¹⁰ and is not permitted to sell RTDs or shots. This exemplifies the challenges of including pre-drafted discretionary conditions in a DLAP and the risk of such conditions being imposed as a matter of course in a way that is not reflective of the particular application. Similarly, a condition in the DLAP that there are to be "no end of aisle sales of alcohol for supermarkets and grocery stores" appears to adopt a policy position against ends of aisles (which the Council will be aware is impermissible).¹¹
19. Without this additional guidance, GDL is concerned with the way that additional discretionary conditions under Policy 5.0 may be interpreted in practice. In GDL's experience, it is commonplace for licensing inspectors and DLCs across New Zealand to mistakenly impose pre-drafted discretionary conditions in a LAP as a matter of course. It is unlawful under the Act to impose discretionary conditions on that basis.
20. GDL considers further amendments to Policy 5.0 are required to ensure that any discretionary conditions are only imposed after having considered the specific application and determining that the test under section 117 of the Act is met.

⁷ DLAP Issues and Options Paper 2024, at p 22.

⁸ *Christchurch Medical Officer of Health v J & G Vaudrey* [2015] NZHC 2749 at [103].

⁹ *Christchurch Medical Officer of Health v J & G Vaudrey* [2015] NZHC 2749 at [104].

Relief sought

21. GDL considers the following amendments are required to Policy 5.0 of the DLAP (amendments are shown in red underline and deletions are shown in red ~~strikethrough~~):

5.0 DISCRETIONARY CONDITIONS

Section 117 of the Act permits a District Licensing Committee to issue any licence subject to any reasonable conditions not inconsistent with the Act.

Discretionary conditions are in addition to the mandatory conditions specified within the Act. Section 117 allows the District Licensing Committee ~~a wide-ranging~~ discretion as to conditions that may be applied to a licence. For the avoidance of doubt, the potential discretionary conditions in this policy are not mandatory and should not be automatically applied as a matter of course.

In order to provide some guidance to the District Licensing Committee and some certainty to applicants, the following conditions are a list of those which may be imposed by the District Licensing Committee where they are considered reasonable and appropriate. In using its discretion to apply conditions, the District Licensing Committee will be guided by the following:

- Connection – whether there is a connection between the problem to be addressed and the proposed activity.
- Impact – whether in the opinion of the District Licensing Committee the proposed condition will contribute to making the drinking environment safer and minimise harm.
- Reasonableness – whether it is ~~within the capabilities of the applicant or licensee to satisfy this condition. any condition must be a proportionate response to an identified risk to be abated or secures a benefit (provided it is of more than marginal relevance to the total risk or benefit). When undertaking this assessment, the District Licensing Committee must consider the specific risks the condition seeks to abate, or benefit to be secured, then weigh the risk / benefit against all relevant circumstances of the particular application before it.~~

5.2 Off-licences

[...]

Relief sought

22. GDL respectfully seeks amendments to:
- (a) Policy 3.2 of the DLAP to retain the maximum off-licence trading hours in the current LAP for supermarkets and grocery stores (Monday to Sunday from 7am to 10pm); and

- (b) Policy 5.0 of the DLAP to make it clear that these are not mandatory conditions and outlining the correct test for applying discretionary conditions under section 117 of the Act.

Yours faithfully



Paul Radich

General Distributors Limited



#49



Monday 14 April 2025

Hastings District Council
207 Lyndon Road East
Hastings 4122
New Zealand

By email: customerservice@hdc.govt.nz

Tēnā koe,

Restaurant Association of New Zealand submission on the Hastings District Council's Local Alcohol Policy Review 2025

The Restaurant Association of New Zealand (the Restaurant Association) welcomes the opportunity to submit on the Hastings District Council's Local Alcohol Policy Review 2025

Since 1972, the Restaurant Association has worked to offer advice, help and assistance in every facet of the vibrant and diverse hospitality industry, covering the length and breadth of the country. We're passionate about our vibrant industry, which is full of interesting, talented and entrepreneurial people.

Hastings District Council proposal

The Restaurant Association's priority for Local Alcohol Policies is to ensure that they accurately reflect the different levels of harm from off- and on- licence venues, and the potential impact of LAPs to those in our sector who operate on-licence venues and are already heavily regulated by the conditions of holding such a licence. We are not opposed to those trading conditions - in fact, we see them as commonsense rules which ensure the safe and responsible sale and supply of alcohol.

While our more than 2,500-strong membership is made up of hospitality businesses where food is the hero of their operations, many offer alcohol beverages as a supplement to the culinary experience they provide. In a practical sense, there are far fewer restrictions and regulations for off-licence holders in terms of the responsible sale and supply of alcohol when compared to on-licence holders.

For example, when serving alcohol in an on-licence venue, staff must monitor intake and determine when they must stop service to prevent intoxication. Alternatively at an off-licence venue, customers can purchase as much alcohol as they want, to take home and then consume as much as they want without any concerns. It is clear that a large part of enabling that problem comes from the proliferation of off-licence venues, and those on-licence venues whose primary business is not food - as distinct from those on-licence venues whose primary business is food.

While the Hastings District Council's proposals generally reflect this sentiment, we submit that licensing rules for the district should be more nuanced, to support a thriving hospitality industry while still taking a risk-based approach to alcohol harm prevention and minimisation.

Further, we are concerned that the proposed discretionary conditions add further responsibility for the safe sale and supply of alcohol on on-licence holders, which are already heavily regulated, while failing to

Page 1 of 3



propose any real harm-reduction conditions on off-licence holders, which we submit pose the highest risk of contributing to alcohol harm and are already poorly regulated.

The Restaurant Association's further views on the Council's proposals are detailed below.

On-licence trading hours

Compared to international standards, New Zealanders traditionally eat dinner and go to bed earlier than many countries around the world. As an industry — and a region — that relies heavily on international tourism to thrive, our hospitality businesses in Hawke's Bay need to be able to make operating decisions that service a wide variety of customer preferences: from the regular who lives down the road, to the group of friends visiting from overseas who are looking for somewhere to sit down for dinner at what we would consider a late hour.

We're proud of the contribution our businesses make to our vibrant towns, cities and communities, but we need policy settings to enable that to continue. As such, we recommend that any hours of trade are set by specific licence type — rather than a broad on-licence versus off-licence categorisation — to enable low-risk restaurants to service an increasing number of tourists looking to dine out later in the evening.

We recognise that the proposed 2am on-licence restriction may be appropriate for night clubs, however we submit that greater flexibility is needed for venues such as Class 3 restaurants with an on-licence, and submit that flexibility around classes of specific on-licence types is aligned with the weighting and times specified in section 5(4) of the *Sale and Supply of Alcohol (Fees) Regulations 2013*.

Proximity to sensitive facilities

Decisions regarding restrictions on proximity to sensitive sites should be evidence-based rather than based on intuition or speculation about what could reduce alcohol-related harm. It is the Restaurant Association's position that any proximity restrictions should be considered on a case by case basis, in particular taking into account:

- The type of licence being applied for (e.g. a Class 3 Restaurant on-licence vs bottle store off-licence)
- How long a business has been operating (e.g. if an ECE or school decides to open near a licensed venue, knowing they will be near a licensed venue, the licensee should not be penalised when they come to renewing their licence).

The Restaurant Association agrees that the policy for new on-licence locations in proximity to sensitive facilities should remain as is.

Off-licence density

While our preferred option would be the status quo, if the Council does implement a temporary freeze on new licence applications, the Restaurant Association believes this should not be implemented as a blanket freeze - rather, it should only apply to certain licence types. It is our position that the risk from on-licence restaurants and cafes is significantly lower than that of off-licence outlets (or even other on-licences, such as night clubs). The Council should not deter restaurants and cafes from investing in high deprivation communities which is likely to occur if they are unable to obtain an on-licence.

Discretionary conditions

The Restaurant Association would also like to take this opportunity to highlight our other priorities for local alcohol policies:



- Modernising approaches to Restaurant licensing
- Conditions relating to minimum numbers of qualified managers
- Renewal of licences

Modernising approaches to Restaurant licensing

There is a risk of LAPs impacting the food and beverage sector of the hospitality industry by regulating through broad “on-licence” and “off-licence” categorisation, and we submit there is a need to consider the differing risks posed by sub-class of licences. We would like to see LAPs be more specific, where for example, when considering any kind of restriction or regulation (such as one way door policies, proximity and density rules or time of sale restrictions), that conditions be set by specific license type, rather than taking a blanket on licence or off-licence approach to regulation.

Conditions relating to minimum numbers of qualified managers

Some Councils have adopted (or are looking to adopt) a discretionary condition whereby the DLC and ARLA are recommended to consider imposing conditions that specify a minimum number of certified managers be present onsite, if appropriate for large capacity premises at peak times. The exact number would depend on the layout, use and capacity of the premises. This condition fails to recognise the current cost and administrative burden associated with becoming a licensed manager, with those barriers often imposed by the DLC and ARLA themselves. We do not support the imposition of minimum numbers of certified managers without first reforming restrictions around who can hold a managers’ licence, to ensure that we have the appropriately certified workforce available.

Renewal of licences

There is no reason that a licence renewal should be as cumbersome as a new licence application, yet both applicants and councils are facing significant administrative burdens for every licence renewal. The Restaurant Association recommends the Council consider adopting third-party accreditation programmes, such as [HospoCred](#), to streamline application and renewal processes for hospitality businesses. This could be utilised in conjunction with current council processes: by checking whether any complaints or infringements have been recorded against an applicant in the Council’s own database, and then utilising the comprehensive vetting and benchmarking offered by the HospoCred accreditation programme, local and central governments can streamline workflows, reduce costs, and build stronger partnerships with the hospitality industry.

Conclusion

Thank you for the opportunity to provide feedback on your draft local alcohol policy. We would be happy to discuss any part of this submission in more detail, and to provide any assistance that you may require.

Ngā mihi nui,

A handwritten signature in black ink, appearing to read 'Marisa Bidois', written in a cursive style.

Marisa Bidois
Chief Executive

#50



April 9, 2025

Re: Proposed Changes to Hastings Local Alcohol Policy for special licenses.

We wish to strongly oppose the proposed first draft LAP provisions (2025) Section 5.3: Serve reduction systems in place to manage intoxication levels – maximum serves of 2 per sale reducing to 1.

Here is our considered reasoning:

First a quick background for context.

As you will no doubt be aware these are very tough times for live events both regionally and nationally. Many events have been cancelled or postponed, many ticket holders have been disgruntled over lack of refunds due to cancellations and many proposals for live events are 'on hold' before making decisions on viability of future events – Hawke's Bay is not immune to these issues.

At Black Barn, over more than 20 years we have held more than 300 events in our amphitheatre. We believe it is becoming a destination drawcard to the region, and we know from ticket sales increasingly our concertgoers are travelling in small groups from all over the country to make a weekend of it. We consistently lead in sustainability, guest experience, and community-minded initiatives. As you know, we have worked closely over the years with Hastings District Council, have appreciated your support and advice and have also faced a number of changes to regulations, consents, operating hours and permitted event numbers that we have had to adapt to.

As further context, in the early years while finding our feet and defining our audience we lost money on events at the amphitheatre every year.

All these years later we believe it is now a reasonably finely honed machine. Yes, we can always improve things and are open to suggestions, but we are now fortunate enough that most reputable promoters are very keen to work with us, we have popular bands and artists continually wanting to return and we are now beginning to manage waitlists for all the requests we have for the limited number of events we are permitted to hold each year.

As is evident by the number of events and concerts being cancelled or delayed elsewhere at the moment – this has not been easy to achieve. One reason promoters and artists are keen to work with us is we are reliable, trustworthy, professional and the growing reputation of our venue can now fairly much ensure promoters a sellout - while many others struggle.

Our promise of consistency and reliability to promoters and artists has been hard earned – and at some cost to us over the years.

The thought that, right now—in such an incredibly precarious market—the Council would consider it a good time to tighten the screws even further, rather than ask 'what can we do to help,' is genuinely demotivating, especially given that these proposed changes pose a very real risk of losing events at Black Barn and across the wider Hastings District, which would directly impact the region's vibrancy, tourism, economy, and reputation.

On to specifics:

You mention this is the first review of the Local Alcohol policy since its implementation in 2019.

However, over that time we have implemented significant changes to how we keep our customers safe and how alcohol sales are managed and served at our live events – and all of them are about lower, safer consumption not more.

We believe all of them fit comfortably within your proposed draft provisions for Entertainment Venues except one.

Changes we have implemented that fit your proposed changes:

- Event hours: Since 2023 we have stipulated to all promoters and artists that all events in our amphitheatre must end by 10.30pm promptly. This is out of respect to neighbours and to further ensure things don't become problematic later in an evening due to alcohol.
- Restriction on strength of drinks sold: We sell no alcohol beverages in the amphitheatre higher than the alc/vol of wine. We sell no shots or spirits, and low alcohol beer and non-alcoholic options are always available.
- Access to non-alcoholic beverages: Complementary water in recyclable cups is available at all areas of the bar as well as at four separate water stations around the venue.
- Security staff/portaloos/rubbish bins: Our security staff and Portaloos ratios are well within recommended guidelines. Our security staff are uniformed, easily identified and maintain a presence from 2 hours before an event until one hour afterwards. We manage security and amenities to exceed industry standards. This season, we brought in one of New Zealand's top security providers—experienced in major events at Eden Park, Rhythm and Alps, and Synthoni – to name just a few. Their impact at Black Barn has been praised by Police, First Aid teams, promoters, and concertgoers for significantly reducing potential harm and enhancing crowd care. We have also made significant inroads into our rubbish management in recent years with 90% of our waste now being diverted from landfill.
- Egress: Again, we have changed this significantly in recent years with concert goers well managed via a series of gated access ways, temporary pedestrian crossings and clear access signage. This has resulted in no-one needing to walk alongside roadways with just one monitored crossing point. Taxi and 'sober driver' drop off and pick up areas are well signposted and utilised.
- Full bottle wine sales: Full bottle wine sales no longer occur. Infact no glassware including wine and beer bottles are permitted into the venue or served from the bars. Bags are also checked at entry points.
- We have also recently significantly improved the variety and quality of food offerings around the venue. This has meant most concert goers now include either a snack or a full meal during the event.
- For each concert we set up an easily identifiable and accessed first aid facility with a trained medical team on hand. Thankfully this is rarely utilised.
- 'Pre-loading' is always a concern, and we continue to monitor this. We used to allow 'picnicking in the grounds' before an event. This is no longer permissible and clear signage around the venue in parking areas etc clearly states no alcohol consumption is permitted, and security teams monitor this.

The above are changes we have implemented since 2019 and we believe comply with your proposed changes.

The one area we have genuine concerns over is the logistics and management of:

Discretionary conditions: Special Licenses change: 'Service reduction systems in place to manage intoxication levels – maximum serves of 2 per sale reducing to 1.

If as it reads, this is a service management system that kicks in should intoxication levels be of concern resulting in the reduction of serves to 2 and then down to 1, we would have no problem with this. We already work closely with the Police on hand and if it is collectively felt intoxication levels are increasing, we reduce serves or simply shut the bars.

(Our recent earlier closing times of 10.30pm means this has rarely been an issue since.)

If, however, this is meant as a blanket maximum serve of 2 per sale down to one for an entire event to avoid intoxication levels, we would have significant logistical concerns with this.

To explain our concerns here is the issue:

By far the majority of our event ticket sales are for small groups of friends – usually 4 to 6 people.

If you have been to a concert at our amphitheatre, you will know that the first thing people do is find their spot together on the terrace which will be their 'home' for the evening. Then someone usually heads to the bar to buy the drinks and someone else heads to the food service options to buy food. Whoever is remaining stays where they are to 'mind the space'.

We are currently limited to four drinks per sale, and these are in either recyclable plastic cups (wine) or single serve cans (Beer and Pals).

If we had to reduce these sales to 2 drinks per customer it would have an enormous impact on our staffing, extended bar area required, management of queue frustration and probably even tighter vigilance on pre-loading and alcohol being brought into the venue from people wanting to avoid long wait times to be served.

As mentioned above, we have had many years of streamlining our entire concert amphitheatre operation. Everything from new parking areas to pedestrian control, to additional security and first aid, to reduction in waste and perhaps most importantly significant changes to the amount and ways we serve, and control alcohol has changed – and all for the additional safety of concert goers and reputation of our venue.

To now ask us to try and cope with the potential chaos of people constantly having to head up and down terraces through a concert simply to get a drink (or maximum 2) for a group of friends would be untenable.

It may slightly reduce alcohol consumption but only by increasing frustration and potential anger from ticket paying concert goers spending more of their evening standing in queues than enjoying the event.

It will be our staff and our business that will receive the negative backlash, anger and critical reviews of slow service and long queues that will result – not Hastings District Council.

Can we just finish by saying, over this summer of the 2024/25 season we have had more than 17,000 people at our events who have thankfully had a thoroughly enjoyable evening and gone home raving to friends and social media followers about the artist, the venue – and often the region.

In that time and with the support of the Police we have had to evict less than 20 people for intoxication.

We have worked hard to get our systems streamlined and our venue to a point where we believe it is a showcase for the region and a place both visitors and artists want to return to.

As you might be aware from other venue issues it is very easy to tip that into anger and frustration due to unnecessary queuing and unworkable restrictions.

We would be happy to discuss this further if required but would ask you to seriously re-consider the implications of this one point on your proposed changes.

Thank you.

Kim Thorp Black Co-owner
Francis de Jager Events Manager
Black Barn Vineyards.

#51

Local Alcohol Policy Submission
Hastings District Council
customerservice@hdc.govt.nz

To whom it may concern,

I am writing to share my concerns about the proposed changes to special licence applications in the Hastings District. As the owner of Shed 530 Estate, I see firsthand how important the future of live events and hospitality are to the community. These changes could place significant pressure on local businesses and may have unintended consequences for the wider entertainment industry in Hawke's Bay.

Concerns about the proposed changes:

The proposed restrictions on drink sales, alcohol percentage, and serving containers do not take into account the responsible service practices that are already in place. Limiting drink options and serving containers could create logistical challenges, increase costs for venues, and negatively impact the experience for event attendees.

The introduction of a one-way door policy may discourage people from entering events early, which could affect vendors and reduce the overall atmosphere. It also does not consider individuals who may need to step out briefly, such as designated drivers or parents attending with children.

The requirement for separate non-alcoholic beverage service areas, while well-intended, may be impractical and inefficient. A more effective approach would be to ensure that non-alcoholic options are clearly available at all service points, making them accessible without unnecessary segregation.

Additional requirements for "class one" events present further challenges. Increased security staffing, additional porta-loos, and rubbish bins should be based on the specific needs of each event rather than a blanket requirement, as this could make smaller events financially unviable.

The proposed stricter drink limits, reducing from four to two, then one, may lead to unintended consequences such as pre-loading before events, which goes against responsible drinking efforts.

Extending the application timeline to 25 working days may reduce flexibility for organizing events and could prevent smaller or spontaneous events from taking place. While detailed Alcohol Management Plans are important, adding more administrative requirements does not necessarily improve safety outcomes and may create additional burdens for event organizers.

Impact on Hawke's Bay's recovery:

Hawke's Bay is still recovering from the devastating effects of Cyclone Gabrielle, and many businesses, including ours, are working hard to rebuild. Events will be instrumental in bringing

people back to the region, boosting the local economy, and providing opportunities for the community to reconnect.

Instead of supporting this recovery, these proposed changes may unintentionally make it more difficult to host events, potentially discouraging promoters from choosing Hawke's Bay as a destination. Live events play a crucial role in attracting visitors, sustaining jobs, and supporting local businesses, and it is important to ensure that regulations do not create unnecessary obstacles to their success.

Suggested alternative approaches:

Rather than implementing broad restrictions, I encourage the Hastings District Council to consider approaches that support both responsible alcohol service and the continued viability of events in the region.

Maintaining current drink service limits, ensuring non-alcoholic options are readily available without requiring separate service areas, and allowing security and infrastructure requirements to be assessed on an event-by-event basis would provide a more balanced approach.

Keeping application timelines flexible would support a thriving event scene, and collaboration with venues, event organizers, and industry experts would allow for practical solutions that prioritize safety while maintaining a vibrant local entertainment industry.

I appreciate the Council's efforts to enhance event safety and welcome the opportunity to discuss these concerns further. I look forward to working together to find solutions that benefit both the community and the industry.

Sincerely,



Hamish Gordon
CEO
Shed 530 Estate

#52

Hastings District Council
Regulatory Services
customerservice@hdc.govt.nz

Dear Hastings District Council,

I am writing in my capacity as the Hospitality Manager at Shed 530 Estate to express my concerns regarding the proposed changes to special licence applications. While I acknowledge the intention behind these amendments, they pose significant challenges for venues like ours and the broader hospitality and events sector in Hawke's Bay.

The proposed restrictions on drink types, alcohol percentage, and serving containers overlook the responsible service measures that are already well-regulated in licensed venues. Imposing these new limitations would not only create logistical challenges and additional costs but also negatively impact the experience for patrons attending events.

The introduction of a one-way door policy is another aspect that raises concerns. This measure may discourage guests from arriving early, affecting event vendors and diminishing the overall atmosphere. It also does not consider attendees who may need to step out briefly and return, such as designated drivers or parents with young children.

A requirement for separate non-alcoholic beverage service areas at events with underage attendees is well-intended but impractical. A more effective and operationally efficient approach would be to mandate that all service areas clearly provide non-alcoholic options without requiring unnecessary segregation.

For Class One events, the increased security requirements, stricter drink limits, and additional infrastructure demands would create undue financial pressure on event organizers. The reduction of drink serve limits, from four to two and then one, may encourage pre-loading, which is counterproductive to responsible drinking initiatives.

Additionally, extending the licence application timeline to 25 working days reduces flexibility for event planning. Many events are organized within shorter timeframes, and this extended requirement could result in missed opportunities for hosting successful community and tourism-driven gatherings. While detailed Alcohol Management Plans are essential, adding excessive administrative steps may deter event organizers rather than improve safety outcomes.

Hawke's Bay is still recovering from the long-term effects of Cyclone Gabrielle. Events play a key role in bringing visitors back, driving economic activity, and reconnecting the local community. Instead of fostering this recovery, the proposed restrictions may unintentionally discourage event promoters from choosing Hawke's Bay as a destination, ultimately impacting local businesses, job opportunities, and tourism.

Rather than introducing broad and rigid restrictions, I encourage the Council to consider alternative solutions that ensure responsible alcohol service while supporting the sustainability of events. Maintaining existing drink service limits would help prevent unintended consequences, such as pre-loading, which could undermine the goal of responsible drinking. Additionally, ensuring that non-alcoholic beverages are available at all service points without requiring separate service areas would improve accessibility and efficiency. Security and infrastructure requirements should be assessed on an event-by-event basis, as a one-size-fits-all approach could impose unnecessary financial burdens on

smaller events. Finally, keeping application timelines flexible would allow for the spontaneity of community-driven events, which are essential to the local event scene. Engaging directly with industry professionals to refine policies can also help find the right balance between safety and the sustainability of the event industry.

I appreciate the Council's commitment to ensuring safe and well-managed events and welcome further discussion on how we can achieve these goals collaboratively. Thoughtful policy adjustments can help balance public safety concerns with the need to support businesses and the wider Hawke's Bay community.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Woodman', with a long horizontal flourish extending to the right.

Carl Woodman
Hospitality Manager
Shed 530 Estate

#53

Hastings District Council
Regulatory Services
customerservice@hdc.govt.nz

Re: Proposed Changes to Special Licence Applications

Dear Hastings District Council,

I am writing to provide feedback on the proposed changes to special licence applications in the Hastings District. As a member of the team at Shed 530 Estate, I have seen firsthand the impact that live events have on the local economy and community well-being. While I understand the intent behind these proposed regulations, I am concerned that they may create unnecessary challenges for businesses and event organizers in Hawke's Bay.

The suggested restrictions on drink sales, alcohol percentage, and serving containers may complicate event logistics without necessarily improving safety. Many venues, including ours, already have strong responsible service policies in place, and these additional limitations could lead to increased costs and a diminished customer experience.

The proposed one-way door policy also raises concerns. Preventing re-entry may discourage early attendance, affecting vendors and the overall event atmosphere. It also does not accommodate individuals who may need to step out briefly, such as designated drivers or parents.

Another issue is the requirement for separate non-alcoholic beverage service areas at events with underage attendees. While ensuring access to non-alcoholic drinks is important, a dedicated service area may be impractical. A more effective solution would be ensuring that these options are clearly available at all existing service points.

The additional regulations for Class One events - such as increased security staffing, infrastructure requirements, and stricter drink limits, could place financial strain on organisers. The new drink limits, reducing to two and then to one, could also encourage pre-loading before events, which contradicts responsible drinking practices.

Considerations for Hawke's Bay's Recovery

Hawke's Bay is still in a recovery phase following Cyclone Gabrielle, and events play a vital role in rebuilding the local economy. They bring visitors into the region, support local businesses, and provide spaces for community connection. These proposed changes could make it harder to host events, reducing economic and social benefits at a time when the region needs them most.

Alternative Approaches

Rather than applying sweeping restrictions, I encourage the Council to consider more targeted solutions that support both public safety and the sustainability of the local events sector. Some suggestions include:

- Maintaining current drink service limits to prevent unintended negative consequences.
- Ensuring that non-alcoholic options are accessible at all service points, rather than requiring a separate service area.
- Allowing security and infrastructure requirements to be assessed based on the specific needs of each event rather than imposing blanket regulations.
- Keeping application timelines flexible to support a diverse and dynamic event scene.
- Engaging with venues, event organisers, and industry professionals to develop policies that balance safety with the continued success of Hawke's Bay's event industry.

I appreciate the Council's commitment to event safety and welcome the opportunity for further discussion. I hope we can work together to create practical, balanced solutions that benefit both the industry and the wider community.

Sincerely,

Kel Dixon
Winemaker and Sales
Shed 530 Estate

#54



Hospitality New Zealand

TO HASTINGS DISTRICT COUNCIL (HDC)

SUBMISSION ON

HASTINGS LOCAL ALCOHOL POLICY

APRIL 2025

[REDACTED]

About Hospitality New Zealand:

1. Hospitality New Zealand ("Hospitality NZ") is a member-led, not-for-profit organisation representing around 2,500 businesses, including cafés, restaurants, bars, clubs, nightclubs, commercial accommodation, country hotels and off-licences. Our vision is to see hospitality recognised and celebrated for its contribution to Aotearoa, attracting fresh talent and generating sustainable returns for businesses and communities.
2. Hospitality NZ has advocated on behalf of the hospitality and tourism sector for over 120 years. We support and improve the hospitality industry in Aotearoa New Zealand through advocacy, training, connection, and support. We want to create a vibrant, sustainable and thriving hospitality sector that benefits businesses, employees, economies and communities. We aim to empower hospitality businesses with the knowledge, resources, and partnerships they need to succeed and contribute positively to their communities.
3. As the trusted body, we seek to unlock the industry's full potential as a significant engine for growth in the New Zealand economy and to ensure that the industry's needs are represented by engaging with the Government and wider industry.
4. This submission relates to the Hastings District Council Local Alcohol Policy ("LAP").
5. Enquiries relating to this submission should be referred to Shane Phillips, shane@hospitality.org.nz.

General Comments:

6. Hospitality New Zealand welcomes the opportunity to comment on the Draft Hastings Local Policy.
7. Hospitality New Zealand firmly believes that well run on-licensed environments are part of the solution to addressing alcohol related harm in New Zealand. This was supported by HDC staff at the Stakeholders meeting on March 31st.
8. Hospitality New Zealand has seen a significant rise in attendees for Host Responsibility Training in the Hawkes Bay region showing a clear commitment to reduce alcohol harm in their venues and communities. These sessions have been well attended by staff from the triagencies showing a clear understanding of the benefits of training and working together for a positive outcome on Alcohol Harm Reduction in the community.

Specific Comments:

PROVISION 1 - TRADING HOURS

9. Hospitality NZ opposes the proposed 2am closing time for hospitality venues, reducing hours from the existing 3am closing time.
10. We do not believe reducing closing hours for on-licensed venues in Hastings will meaningfully minimise alcohol-related harm in line with the objective of the Sale and Supply of Alcohol Act. Hospitality NZ believes well-run licensed venues play a key role in supporting safe and responsible consumption of alcohol. By reducing on-premise hours, there is a risk it pushes consumption of alcohol to unlicensed environments, potentially working against the Council's aims of reducing alcohol-related harm.
11. We also believe further consideration should be given to the economic effects of reducing trading hours. As 1 of 12 Great Wine Capitals of the World, among other accolades, Hawke's Bay is a premier destination for both international and domestic visitors, and has built its brand on elevated tourism and hospitality experiences. These visitors expect opportunities to enjoy a region's vibrancy at all hours of the day, and reducing hours doesn't support the aims of the region looking to drive a thriving visitor economy.

PROVISION 2 - LOCATION AND DENSITY

12. The Council currently has the ability to approve or oppose any applications in these proposed areas without the need of the LAP.
13. We believe that Police evidence highlights the fact that the vast majority of alcohol related harm is happening outside of on-licensed premises, with no relevant evidence to support proposals to reduce closing times for hospitality venues.

PROVISION 3 - DISCRETIONARY CONDITIONS

14. Given the subjective nature of how a District Licensing Committee (DLC) can consider imposing discretionary conditions at license application or renewal (i.e. what may seem reasonable to a DLC member may be impractical for a venue), we do not support the extent of discretionary conditions laid out in the draft LAP. Some examples are laid out below:
 - a. ***Use of outdoor areas after a certain time*** - We do not support the inclusion of this provision – outdoor dining areas are a drawcard for venues who have them, and contribute to vibrancy. They add to the security and safety of patrons. Restricting

such areas would force people out onto the street or outside the controlled licensed premise for vaping or cigarettes.

- b. **No serving in glass containers at specified times** – This can create confusion and costs for venues. It also limits the purchase of wine, and low-or no-alcohol bottled products. Sustainability practises here would be questionable.
- c. **One-way door restrictions** – We do not believe a one-way door policy is an effective tool for alcohol harm minimisation, and can present safety issues separating groups and resulting in congregating of crowds outside closing venues rather than natural dispersion.
- d. **Serve reduction systems** - We believe a well-managed event can maintain a responsible service of alcohol without requiring attendees to queue for longer periods of time causing frustration and having a negative effect on the experience of those attending.
- e. **Provision of additional security (staff) after specified times** – Such a provision will cause many unnecessary costs to businesses. Patron number to security personnel ratio will also have the same effect.
- f. **Provision of transport for patrons** – Transport options are already clearly displayed as part of the licensing requirements.

Recommendations

- 15. In summary, Hospitality NZ is in support of some of the proposed changes to the Hastings District Council Local Alcohol Policy (LAP). We are also in disagreement with others;
 - a. We recommend retaining the existing closing time of 3am for on-licensed Hospitality Venues.
 - b. We strongly recommend keeping the closing times for venues in line with those in Napier or surrounding areas.
 - c. We strongly recommend caution when proceeding with any discretionary conditions.
- 16. Hospitality NZ recommends that rather than seeking to place further restrictions on on-licensed premises, the Council and Police should focus on reducing alcohol-related harm using existing tools available to them. The following proposals both support the aims of the Act to reduce alcohol related harm, while enhancing the vibrancy and safety of the Hawkes Bay Region at night and supporting the provision of safe and controlled on-licensed environments in the region.
 - a. Improved public transport options at night.
 - b. Greater enforcement of liquor bans by Police and minimisation of pre-loading
 - c. Greater Police presence in entertainment precincts areas.
- 17. We would welcome the opportunity to work more closely with Council, Police & Public Health to further explore these recommendations and ways Hospitality NZ members can assist.

Conclusion

18. We thank the Hastings District Council for the opportunity to provide input into the consultation.
19. We would be happy to discuss any parts of this submission in more detail, and to provide any assistance that may be required.
20. On behalf of our members, we are available for consultation on this important community issue and wish to speak to our submission during the verbal deputation process.

Officer note: Proforma of Hospitality Association Submission

#55



**Havelock North
Motor Lodge**

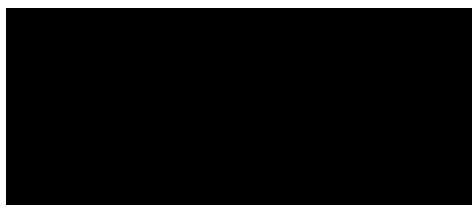
AAA Hospitality Ltd

TO HASTINGS DISTRICT COUNCIL (HDC)

SUBMISSION ON

HASTINGS LOCAL ALCOHOL POLICY

APRIL 2025



General Comments:

1. AAA Hospitality Ltd welcomes the opportunity to comment on the Draft Hastings Local Policy.
2. AAA Hospitality Ltd firmly believes that well run on-licensed environments are part of the solution to addressing alcohol related harm in New Zealand. This was supported by HDC staff at the Stakeholders meeting on March 31st.

Specific Comments:

PROVISION 1 - TRADING HOURS

3. We oppose the proposed 2am closing time for hospitality venues, reducing hours from the existing 3am closing time.
4. We do not believe reducing closing hours for on-licensed venues in Hastings will meaningfully minimise alcohol-related harm in line with the objective of the Sale and Supply of Alcohol Act. We believe well-run licensed venues play a key role in supporting safe and responsible consumption of alcohol. By reducing on-premise hours, there is a risk it pushes consumption of alcohol to unlicensed environments, potentially working against the Council's aims of reducing alcohol-related harm.
5. We also believe further consideration should be given to the economic effects of reducing trading hours. As 1 of 12 Great Wine Capitals of the World, among other accolades, Hawke's Bay is a premier destination for both international and domestic visitors, and has built its brand on elevated tourism and hospitality experiences. These visitors expect opportunities to enjoy a region's vibrancy at all hours of the day, and reducing hours doesn't support the aims of the region looking to drive a thriving visitor economy.

PROVISION 2 - LOCATION AND DENSITY

6. The Council currently has the ability to approve or oppose any applications in these proposed areas without the need of the LAP.
7. We believe that Police evidence highlights the fact that the vast majority of alcohol related harm is happening outside of on-licensed premises, with no relevant evidence to support proposals to reduce closing times for hospitality venues.

PROVISION 3 - DISCRETIONARY CONDITIONS

8. Given the subjective nature of how a District Licensing Committee (DLC) can consider imposing discretionary conditions at license application or renewal (i.e. what may seem reasonable to a DLC member may be impractical for a venue), we do not support the extent of discretionary conditions laid out in the draft LAP. Some examples are laid out below:
 - a. ***Use of outdoor areas after a certain time*** - We do not support the inclusion of this provision – outdoor dining areas are a drawcard for venues who have them, and contribute to vibrancy. They add to the security and safety of patrons. Restricting such areas would force people out onto the street or outside the controlled licensed premise for vaping or cigarettes.
 - b. ***No serving in glass containers at specified times*** – This can create confusion and costs for venues. It also limits the purchase of wine, and low-or no-alcohol bottled products. Sustainability practises here would be questionable.
 - c. ***One-way door restrictions*** – We do not believe a one-way door policy is an effective tool for alcohol harm minimisation, and can present safety issues separating groups and resulting in congregating of crowds outside closing venues rather than natural dispersion.
 - d. ***Serve reduction systems*** - We believe a well-managed event can maintain a responsible service of alcohol without requiring attendees to queue for longer periods of time causing frustration and having a negative effect on the experience of those attending.
 - e. ***Provision of additional security (staff) after specified times*** – Such a provision will cause many unnecessary costs to businesses. Patron number to security personnel ratio will also have the same effect.
 - f. ***Provision of transport for patrons*** – Transport options are already clearly displayed as part of the licensing requirements.

Recommendations

9. In summary, we are in support of some of the proposed changes to the Hastings District Council Local Alcohol Policy (LAP). We are also in disagreement with others;
 - a. We recommend retaining the existing closing time of 3am for on-licensed Hospitality Venues.
 - b. We strongly recommend keeping the closing times for venues in line with those in Napier or surrounding areas.
 - c. We strongly recommend caution when proceeding with any discretionary conditions.
10. We recommend that rather than seeking to place further restrictions on on-licensed premises, the Council and Police should focus on reducing alcohol-related harm using existing tools available to them. The following proposals both support the aims of the Act to reduce alcohol related harm, while enhancing the vibrancy and safety of the Hawkes Bay Region at night and supporting the provision of safe and controlled on-licensed environments in the region.
 - a. Improved public transport options at night.
 - b. Greater enforcement of liquor bans by Police and minimisation of pre-loading
 - c. Greater Police presence in entertainment precincts areas.
11. We would welcome the opportunity to work more closely with Council, Police & Public Health to further explore these recommendations and ways Hospitality NZ members can assist.

Conclusion

12. We thank the Hastings District Council for the opportunity to provide input into the consultation.
13. We would be happy to discuss any parts of this submission in more detail, and to provide any assistance that may be required.

#56



**Submission on the Hastings District Council
Draft Local Alcohol Policy 2025**

14 April 2025

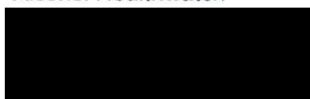
Kia ora

Thank you for the opportunity to provide feedback on the Hastings District Council Draft Local Alcohol Policy.

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

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

Jennifer Lamm
Alcohol Healthwatch



About Alcohol Healthwatch

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

General Comments

1. Alcohol Healthwatch commends the Council on its commitment to reviewing the joint 2019 Local Alcohol Policy (LAP), and we wish to acknowledge the efforts of councillors and officers in conducting this review on behalf of communities in the district, and the early engagement with key agents and stakeholders to inform this work¹.
2. This submission is largely similar to our submission to Napier City Council on that Council's draft LAP 2025, as while there is no longer a joint LAP, we consider that the provisions in each LAP should continue to align.

Alcohol-related harm

2. Of all drugs available in our society, alcohol is the most harmful². Alcohol is a leading cause of preventable death, injury and ill health in Aotearoa New Zealand and a significant contributor to the social and health inequities experienced by Māori, Pacific peoples and other impacted groups.³
3. Alcohol is a component cause for more than 200 disease and injury conditions⁴, and is the leading behavioural risk factor for death and disability adjusted life years lost among New Zealanders aged 15 to 49 years⁵.
4. The cost of alcohol-related harm in Aotearoa has been estimated at over \$9.1 billion annually⁶. The harms are far-reaching and deeply felt by many families and communities. The Hastings District Council Research Paper 2024 clearly identifies the issues and summarises the data on alcohol harm in the district^{7 8 9}.

Local Alcohol Policies

5. We strongly believe that a LAP should not be considered in isolation, but should be seen as part of a cohesive package to reduce alcohol-related harm that includes alcohol bans¹⁰ alcohol licensing fees¹¹, the Joint Alcohol Strategy and other alcohol-related policies as well as a LAP.
6. A LAP which has the effect of reducing the overall availability of alcohol has significant potential to further minimise alcohol-related harm and improve community well-being. Measures that reduce accessibility and availability of alcohol have particular benefits for those who experience significant inequities in harm. To date, alcohol outlets in Aotearoa New Zealand have been inequitably distributed to the most deprived neighbourhoods and the unequal harms from this can be addressed through a LAP¹².
7. By incorporating evidence-based measures to address both the physical (location) and temporal (operating hours) availability of alcohol, a LAP can support other harm reduction interventions in the local area and assist in sending a strong signal to communities regarding the harms associated with alcohol use.

Specific comments

8. Alcohol Healthwatch supports provisions in the LAP that are aligned to the object of the Sale and Supply of Alcohol Act 2012 (the Act), that reflect the needs of the community and are supported by evidence for reducing alcohol-related harm¹³.

9. The review of the LAP is timely and provides an opportunity for the LAP to reflect:

- The Sale and Supply of Alcohol (Community Participation) Amendment Act 2023¹⁴ that made it easier for communities to have a say in alcohol regulation and simplified the process to develop a LAP by removing the ability to appeal provisional LAPs¹⁵;
- The Supreme Court decision on the Auckland Council Provisional LAP¹⁶ that affirmed that “a precautionary approach is open and that, in any event, a restriction may be justified on the basis of there being a reasonable likelihood that it will reduce alcohol-related harm”,¹⁷ and that “policies that are implemented by a local alcohol policy can be based on, or at least influenced by, community preference;”¹⁸
- The changing environment and emerging issues in the Hastings district since 2019;
- The desirability of ensuring greater consistency and synergy with LAPs (and proposed LAPs) in the Hawke’s Bay region (and particularly with Napier City) and across Aotearoa New Zealand; and
- The growing acceptance that a LAP can provide greater certainty and clarity for the public, licensing bodies and regulatory agencies as well as licensees.

Policies under Section 77(1) of the Act

Location of Premises

Section 77(1)(a) – Broad Areas

10. Through a LAP, territorial authorities may restrict licensed premises to a particular “broad area”, such as a commercial or industrial zone, but must first have regard to the district plan and its objectives and policies (section 78(2)(a) of the Act). We believe the review presents an opportunity to include a policy on “broad areas” with locations clearly identified where licensed premises can be established.¹⁹ A clearly articulated “broad areas” policy can also complement and support other policies, including the policy on the issuing of further off-licences in Flaxmere and Camberley (section 77(1)(d)) and a policy on the proximity to other licensed premises (section 77(1)(b)) and “sensitive facilities” (section 77(1)(c)).

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

11. We recommend the inclusion of a policy preventing new licensed premises from being located in close proximity to other licensed premises. Setting a distance rule would address the harm associated with the clustering of premises and could see, for example, off-licensed premises prevented from being established within, say, 50²⁰ or 100²¹ metres of an existing off-licensed premises.

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

12. There is a need to generally protect vulnerable users of sensitive sites from exposure to off-licence, on-licence and club licence premises and the associated negative amenity effects. Protecting vulnerable populations and users of sensitive sites can also assist to address their disproportionate and inequitable exposure to alcohol and experience of alcohol harms, particularly for young people.²²
13. Considering the research and community concerns, most council LAPs have a sensitive sites policy with a minimum distance²³ between places that sell alcohol and a site. We recommend that this LAP should likewise include a policy that may prevent new licensed premises locating in close proximity to sites such as education facilities (a school, early childhood facility), youth centres, places of worship, rehabilitation treatment centres, marae and Council-owned or managed community facilities that are used by the public for recreation, sport or cultural purposes (eg pools, libraries, museums, community halls).

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

14. We believe that a policy on the issuing of further licences would reflect community concerns and also align with research on the relationship between the proliferation of licences and accessibility to alcohol and alcohol-related harm.^{24 25 26} This policy can halt or reduce the existing numbers of outlets, particularly in areas where licensed premises have reached saturation levels or are located in high socio-deprivation areas²⁷. We therefore strongly support the continuation of the policy preventing the issuing of new off-licences for bottle stores in identified areas in Flaxmere²⁸ and Camberley²⁹, both deprivation decile 10 suburbs. However, we recommend that the areas in Flaxmere and Camberley be extended to areas such as Akina, Mayfair and St Leonards and that the policy should also include other off-licences in addition to bottle stores.

Maximum Trading Hours

Section 77(1)(e) – Trading Hours

15. Reducing trading hours is a key strategy for reducing alcohol-related harms³⁰. Studies have shown that hazardous drinking increases with longer hours and greater availability^{31,32}. This reality is reflected in the current trend for councils to reduce trading hours in their LAPs, particularly for off-licences. As the vast majority of alcohol is purchased from off-licences (over 80%) and often cheaply, we strongly support the decrease in trading hours proposed in the draft LAP.

16. We support the proposed off-licence trading hours of 9am to 9pm and note that this reflects the current trend in LAPs across Aotearoa New Zealand and would help reduce the opportunity of hazardous drinking and “pre loading”, “side-loading” and “post loading” and consequently lessen the incidence of other harms (assault, unintentional injury, drink driving) associated with extended trading hours³³. A recent study has also estimated that implementing stricter limits on off-licence trading hours and density could decrease overall alcohol consumption in Aotearoa New Zealand by 17.9% resulting in a gain of 450,000 health-adjusted life years (HALYs) over the lifetime of the 2018 population³⁴.
17. We are also pleased to see that the LAP has reduced the closing times for on-licences, as earlier closing times help reduce the incidence of serious crime that often occurs with later closing times due to people’s higher levels of intoxication.³⁵ However, we recommend a later opening hour for on-licences (such as taverns, bars, night-clubs) and club licences, as longer trading hours are associated with an increase in hazardous drinking.

Discretionary Conditions

Section 77(1)(f) – Discretionary Conditions

18. We support the amendments to the discretionary conditions in the current LAP, including those conditions that address Crime Prevention through Environmental Design (CPTED) principles, host responsibility and the those that address the management of the premises (including a detailed Alcohol Management Plan for special licences). We also support the requirement for an impact assessment by applicants for on, club and off-licences particularly if the premises would be in a low socio-economic area or where there are known issues.
19. We support the conditions that focus on off-licences, including:
 - (a) *restrictions on single sales*, as such sales generally make alcohol affordable and are often linked to hazardous drinking by vulnerable people;
 - (b) *limitations on alcohol-related exterior signage or advertising*, as this would reduce the exposure of children to alcohol-related advertising and promotions.³⁶ Exposure to alcohol advertising is a known risk factor for alcohol-related harm, contributing to both the amount consumed and frequency of alcohol use. It works on a number of levels including normalising, glamorising, and embedding alcohol consumption into day-to-day settings. Children and young people are at a greater risk from harm as their developing cognitive skills increase their susceptibility to the influence of advertising. The University of Otago *Kids’Cam* research found that New Zealand children aged

11-13 years were exposed to alcohol marketing on average 4.5 times per day. Māori and Pacific children had levels of exposure five and three times greater than European children, respectively. Research undertaken by Alcohol Healthwatch in Tāmaki Makaurau Auckland echoes the Otago University and other studies³⁷, and found that 56% of schools had at least one alcohol advertisement within 500 metres; 75% of alcohol advertisements were from nearby licensed premises; 63% of alcohol advertisements were near low decile schools, 66% of schools had one alcohol advertisement in the radius, with the average number of advertisements near schools was two; and 78% of the alcohol advertisements were within 400 metres of the schools.³⁸ A ban on external advertising can also support CPTED and other measures by prohibiting external signage that obscures the view into/out of the premises; and

- (c) *restricting end of aisle sales of alcohol products*, as this has been shown to increase sales by as much as 23 to 43 percent and would have a significant impact on alcohol consumption.³⁹

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

- (a) *restrictions on Buy Now, Pay Later (BNPL)*, as these schemes are considered an inappropriate method of payment and subvert established mechanisms to minimise harm to public health from alcohol by enticing the consumer with a much lower upfront price. The research shows that the use of BNPL services to purchase alcohol increases its perceived affordability, which can lead to greater consumption and related harms. The availability of alcohol at low alcohol prices facilitates moderate drinkers becoming heavy drinkers, and heavy drinkers transitioning to dependent drinkers. The harm associated with economic accessibility and perceived affordability of alcohol is exacerbated where alcohol is readily available in store (eg outlets in close proximity⁴⁰, long trading hours) and on-line (eg rapid delivery). Young adults are among the heaviest drinkers⁴¹, they are currently the main consumers of BNPL, are also likely to use rapid delivery for their purchases (often without ID checks), and this makes them particularly vulnerable;
- (b) *requirement for mandatory age checks on purchase and delivery*, particularly with the increasing availability of remote sales/delivery. For example, research conducted by Alcohol Healthwatch in Tāmaki Makaurau-Auckland showed that in 73% of alcohol orders did not request age verification on delivery, 49% of alcohol orders were left unattended (contactless) at the door, and 87.5% of delivery companies broke their own restricted items policy. Alcohol delivered without an ID check may make it easier

for under 18 year olds to access alcohol and increases the chances of hazardous drinking;⁴²

- (c) *restrictions on the marketing and promotion of non-alcoholic products* that pose a high risk of alcohol-related harm, such as drinking games and risky items that encourage dangerous drinking (eg beer pong cups);
- (d) *requirement to have FASD (Fetal Alcohol Spectrum Disorder) warning signage* within the alcohol area in supermarkets and grocery stores and at point of sale at bottle stores;⁴³ and
- (e) *Prohibiting special licences for events focused on children and young people* under 18 years to limit their exposure to alcohol.

One-way door restrictions

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

21. We support the continuation of a mandatory one-way door restriction for certain on-licences premises⁴⁴ at 1am (a reduction from 2am). However, we recommend that a one-way door policy should also be extended to clubs. One-way door restrictions would help prevent a large number of people coming out of licensed premises at the same time (as would be the case with a universal maximum closing time) and the potential for intoxicated patrons migrating between venues or interacting with others with an increased likelihood of disorder and crime. These conditions also have the potential to reduce the burden on Police, ambulance and hospital services and can have a positive benefit for not only the patrons of premises but the community generally.

Conclusion

22. Alcohol Healthwatch supports the policies in the draft LAP that have added additional protections for the duration of the policy to address alcohol-related harm. We particularly support the continuation of the policy preventing the issuing of new off-licences for bottle stores in identified areas in Flaxmere and Camberley, the decrease in trading hours, and discretionary conditions that recognise and address issues such as single sales and signage and advertising. Strengthened measures can be effective in meeting the object of the Sale and Supply of Alcohol Act 2012 and reduce the significant burden placed on communities from alcohol-related harm.

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APPENDIX ONE

Alcohol Harm Risk Profile of Area Surrounding:

Flaxmere, Hastings, New Zealand

This report documents the deprivation and ethnic composition characteristics of the local area surrounding Flaxmere, Hastings, New Zealand, and the proximity of Flaxmere, Hastings, New Zealand to sensitive sites. The rationale for considerations of deprivation and ethnic composition in local alcohol licensing decisions is available here.

Level of deprivation in the surrounding area

a) Index of Multiple Deprivation (IMD)

The IMD was developed by the University of Auckland¹ and measures deprivation at the neighbourhood level in custom-designed data zones. Data zones are larger in population size than meshblocks (approximately 8 meshblocks per data zone) but smaller than Census area units. In urban settings, they are just a few streets long and a few streets wide.

Using the IMD, Flaxmere, Hastings, New Zealand, (marked as 'X' in the figure below) is located in data zone 3000015. This data zone or 'neighbourhood' (boundary shown with dark blue line below) has a Census 2018 population of 627 persons. The average population of all 6181 data zones in New Zealand is 761 (range 399 to 1200).

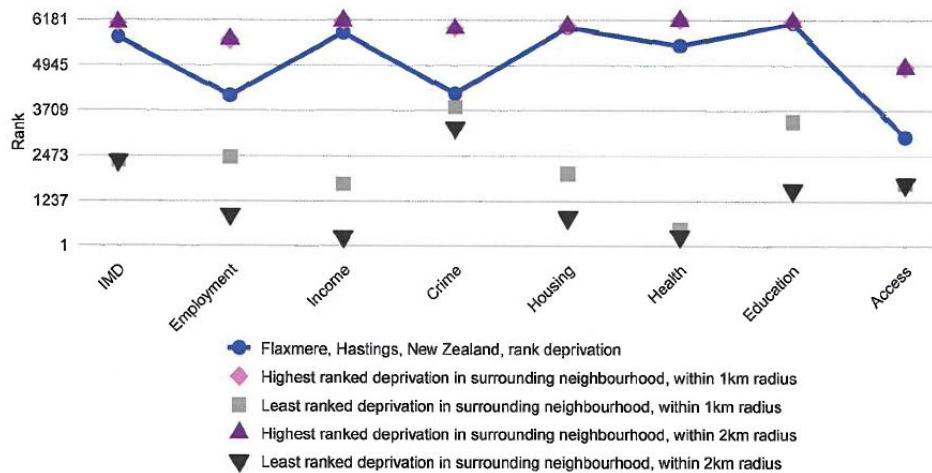
This neighbourhood ranks **5703 of the 6181 neighbourhoods** in New Zealand for overall multiple deprivation. Multiple deprivation comprises 29 indicators grouped into seven domains of deprivation: Employment, Income, Crime, Housing, Health, Education and Access to services.

The IMD ranking of 5703 (Decile 10) places this neighbourhood in the **most deprived 7.7%** of all 6181 neighbourhoods for multiple deprivation.

The level of deprivation in neighbouring data zones within 1km and 2km of Flaxmere, Hastings, New Zealand, is also shown in the figure below (grey circle is 1km radius, black circle is 2km radius - darker colour of data zone, higher deprivation). The location of existing alcohol licenced premises² (as of 2018) are shown as red dots for off-licence premises, orange dots for on-licence premises, and yellow dots for club licence premises. The location of schools³ are shown as grey dots. Note schools includes Early Childhood Education Services, Schools and Tertiary providers. The location of hospitals⁴ (if relevant, as of 2017) are shown using green dots. The location of Marae⁵ (if relevant, as of 2022) are shown using blue dots.



The ranking of each of the seven domains of deprivation in the data zone comprising Flaxmere, Hastings, New Zealand, is shown below. This allows for a much clearer understanding of the type of deprivation that is most prevalent in the immediate neighbourhood. The highest and lowest deprivation scores in any data zone within 1km and 2km of Flaxmere, Hastings, New Zealand, is also shown. The average (mean) IMD deprivation rank (out of 6181) for those data zones within 1km and 2km of Flaxmere, Hastings, New Zealand is 5195.77 and 4875.5, respectively.



Ranking of data zone among all neighbourhoods in New Zealand

Deprivation Domain	Descriptor	Deprivation ranking among all data zones (/6181)	Ranking as percent (high % = high deprivation ranking, max 100%)
Overall IMD	Indicator of overall multiple deprivation, comprised from the seven domains listed below.	5703	92.3%
Employment	The proportion of working age people receiving the Unemployment Benefit or Sickness Benefit.	4113	66.5%
Income	The amount of money per person paid by the government in the form of Working for Families payments and income-tested benefits.	5821	94.2%
Crime	Crime (victimisations per 1000 people - mostly includes theft, burglary and assaults).	4165	67.4%
Housing	Proportion of people living in overcrowded and rented dwellings.	5970	96.6%
Health	Mortality ratio, acute hospitalisations related to selected infectious and selected respiratory diseases, emergency admissions to hospital, and people registered as having selected cancers.	5480	88.7%
Education	Proportion of working age people 15 - 64 years with no formal qualifications; and the proportion of youth aged 15 - 24 years not in education, employment or training.	6084	98.4%
Access	Access to GPs, supermarkets, service stations, schools and early childhood education centres. This shows whether the area has high access to community amenities, retail and facilities.	2980	48.2%

b) The New Zealand Index of Deprivation (NZDep)

Another deprivation index developed in New Zealand, by the University of Otago, is the New Zealand Index of Deprivation 2018⁶, which comprises nine dimensions of deprivation using data from the Census 2018.

Using the Census geographic boundaries, the Statistical Area 1 (a small area that contains 100-200 people) that comprises Flaxmere, Hastings, New Zealand, has a deprivation decile of 10 (decile 1 = least deprived, decile 10 = most deprived).

At the level of Statistical Area 2 (a larger area that equates to a suburb), the deprivation decile is 10.

Ethnic composition in the surrounding area

In the Census 2018, the data zone in which Flaxmere, Hastings, New Zealand, is located had the following ethnic composition. Comparison with the New Zealand total population is shown below.

Ethnic Group	3000015 (%)	New Zealand (%)
Māori	58.6%	16.5%
Pacific Peoples	28.6%	8.1%
Other	34.3%	86.5%

The above table includes all people who stated each ethnic group, whether as their only ethnic group or as one of several. Where a person reported more than one ethnic group, they have been counted in each applicable group. As a result, percentages do not add up to 100.

Proximity to sensitive sites and licenced alcohol premises in the surrounding area

The number of sensitive sites and licenced alcohol premises and the minimum, maximum and average distance of these locations using Euclidean distance to Flaxmere, Hastings, New Zealand within 1km and 2km is outlined in the table below.

Licenced alcohol premises or sensitive site type	Count of locations	Minimum distance (metres)	Average distance (metres, mean)	Maximum distance (metres)
All licenced premises (1km)	6	717.1	753.1	834.8
All licenced premises (2km)	7	717.1	924.8	1955.1
Off-licence premises (1km)	4	717.1	741.7	815.4
Off-licence premises (2km)	5	717.1	984.3	1955.1
On-licence premises (1km)	1	717.1	717.1	717.1
On-licence premises (2km)	1	717.1	717.1	717.1
Club licence premises (1km)	1	834.8	834.8	834.8
Club licence premises (2km)	1	834.8	834.8	834.8
Schools (1km)	3	286.0	421.7	502.3
Schools (2km)	6	286.0	810.3	1372.1
Hospitals (1km)	0	NA	NA	NA
Hospitals (2km)	0	NA	NA	NA
Marae (1km)	0	NA	NA	NA
Marae (2km)	1	1502.8	1502.8	1502.8

Summary

This report, prepared by the University of Auckland, for the location of the premises (Flaxmere, Hastings, New Zealand) states that the community in this locality is Decile 10 in deprivation. The community also has a much higher than average Māori population and a much higher than average Pacific population. The level of deprivation and ethnic composition of a locality are important indicators of its vulnerability to alcohol-related harm.

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Further information

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APPENDIX TWO

Alcohol Harm Risk Profile of Area Surrounding:

Camberley, Hastings

This report documents the deprivation and ethnic composition characteristics of the local area surrounding Camberley, Hastings, and the proximity of Camberley, Hastings to sensitive sites. The rationale for considerations of deprivation and ethnic composition in local alcohol licensing decisions is available here.

Level of deprivation in the surrounding area

a) Index of Multiple Deprivation (IMD)

The IMD was developed by the University of Auckland¹ and measures deprivation at the neighbourhood level in custom-designed data zones. Data zones are larger in population size than meshblocks (approximately 8 meshblocks per data zone) but smaller than Census area units. In urban settings, they are just a few streets long and a few streets wide.

Using the IMD, Camberley, Hastings, (marked as 'X' in the figure below) is located in data zone 3000034. This data zone or 'neighbourhood' (boundary shown with dark blue line below) has a Census 2018 population of 588 persons. The average population of all 6181 data zones in New Zealand is 761 (range 399 to 1200).

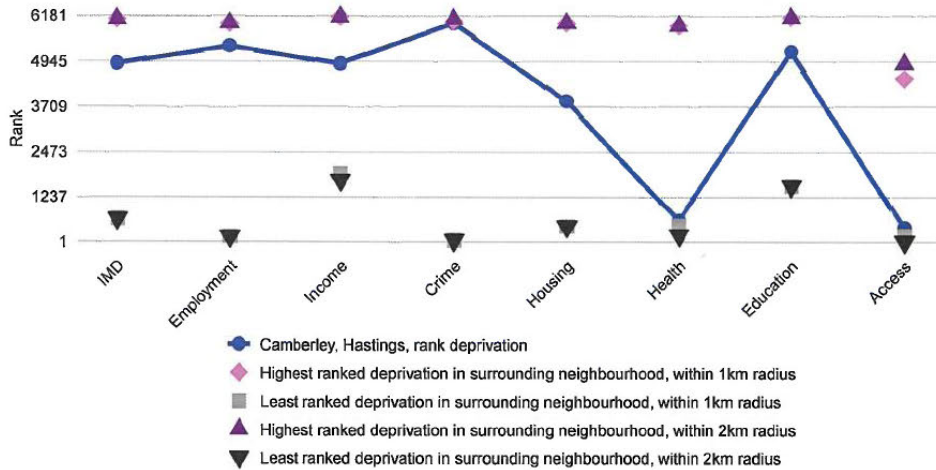
This neighbourhood ranks **4887 of the 6181 neighbourhoods** in New Zealand for overall multiple deprivation. Multiple deprivation comprises 29 indicators grouped into seven domains of deprivation: Employment, Income, Crime, Housing, Health, Education and Access to services.

The IMD ranking of 4887 (Decile 8) places this neighbourhood in the **most deprived 20.9%** of all 6181 neighbourhoods for multiple deprivation.

The level of deprivation in neighbouring data zones within 1km and 2km of Camberley, Hastings, is also shown in the figure below (grey circle is 1km radius, black circle is 2km radius - darker colour of data zone, higher deprivation). The location of existing alcohol licenced premises² (as of 2018) are shown as red dots for off-licence premises, orange dots for on-licence premises, and yellow dots for club licence premises. The location of schools³ are shown as grey dots. Note schools includes Early Childhood Education Services, Schools and Tertiary providers. The location of hospitals⁴ (if relevant, as of 2017) are shown using green dots. The location of Marae⁵ (if relevant, as of 2022) are shown using blue dots.



The ranking of each of the seven domains of deprivation in the data zone comprising Camberley, Hastings, is shown below. This allows for a much clearer understanding of the type of deprivation that is most prevalent in the immediate neighbourhood. The highest and lowest deprivation scores in any data zone within 1km and 2km of Camberley, Hastings, is also shown. The average (mean) IMD deprivation rank (out of 6181) for those data zones within 1km and 2km of Camberley, Hastings is 3856.92 and 4175.35, respectively.



Ranking of data zone among all neighbourhoods in New Zealand

Deprivation Domain	Descriptor	Deprivation ranking among all data zones (/6181)	Ranking as percent (high % = high deprivation ranking, max 100%)
Overall IMD	Indicator of overall multiple deprivation, comprised from the seven domains listed below.	4887.0	79.1%
Employment	The proportion of working age people receiving the Unemployment Benefit or Sickness Benefit.	5358.5	86.7%
Income	The amount of money per person paid by the government in the form of Working for Families payments and income-tested benefits.	4882.0	79.0%
Crime	Crime (victimisations per 1000 people - mostly includes theft, burglary and assaults).	5976.0	96.7%
Housing	Proportion of people living in overcrowded and rented dwellings.	3855.0	62.4%
Health	Mortality ratio, acute hospitalisations related to selected infectious and selected respiratory diseases, emergency admissions to hospital, and people registered as having selected cancers.	586.0	9.5%
Education	Proportion of working age people 15 - 64 years with no formal qualifications; and the proportion of youth aged 15 - 24 years not in education, employment or training.	5213.0	84.3%
Access	Access to GPs, supermarkets, service stations, schools and early childhood education centres. This shows whether the area has high access to community amenities, retail and facilities.	394.0	6.4%

b) The New Zealand Index of Deprivation (NZDep)

Another deprivation index developed in New Zealand, by the University of Otago, is the New Zealand Index of Deprivation 2018⁶, which comprises nine dimensions of deprivation using data from the Census 2018.

Using the Census geographic boundaries, the Statistical Area 1 (a small area that contains 100-200 people) that comprises Camberley, Hastings, has a deprivation decile of 7 (decile 1 = least deprived, decile 10 = most deprived).

At the level of Statistical Area 2 (a larger area that equates to a suburb), the deprivation decile is 10.

Ethnic composition in the surrounding area

In the Census 2018, the data zone in which Camberley, Hastings, is located had the following ethnic composition. Comparison with the New Zealand total population is shown below.

Ethnic Group	3000034 (%)	New Zealand (%)
Māori	32.5%	16.5%
Pacific Peoples	10.7%	8.1%
Other	72.6%	86.5%

The above table includes all people who stated each ethnic group, whether as their only ethnic group or as one of several. Where a person reported more than one ethnic group, they have been counted in each applicable group. As a result, percentages do not add up to 100.

Proximity to sensitive sites and licenced alcohol premises in the surrounding area

The number of sensitive sites and licenced alcohol premises and the minimum, maximum and average distance of these locations using Euclidean distance to Camberley, Hastings within 1km and 2km is outlined in the table below.

Licenced alcohol premises or sensitive site type	Count of locations	Minimum distance (metres)	Average distance (metres, mean)	Maximum distance (metres)
All licenced premises (1km)	4	440.1	698.1	897.2
All licenced premises (2km)	25	440.1	1491.1	1976.0
Off-licence premises (1km)	0	NA	NA	NA
Off-licence premises (2km)	4	1239.1	1623.8	1976.0
On-licence premises (1km)	2	440.1	580.1	720.0
On-licence premises (2km)	16	440.1	1469.8	1976.0
Club licence premises (1km)	2	735.2	816.2	897.2
Club licence premises (2km)	5	735.2	1453.4	1966.8
Schools (1km)	3	165.8	487.0	991.8
Schools (2km)	7	165.8	987.9	1834.9
Hospitals (1km)	1	294.1	294.1	294.1
Hospitals (2km)	1	294.1	294.1	294.1
Marae (1km)	0	NA	NA	NA
Marae (2km)	0	NA	NA	NA

Summary

This report, prepared by the University of Auckland, for the location of the premises (Camberley, Hastings) states that the community in this locality is Decile 8 in deprivation. The community also has a higher than average Māori population and a higher than average Pacific population. The level of deprivation and ethnic composition of a locality are important indicators of its vulnerability to alcohol-related harm.

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Further information

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14 April 2025

Health New Zealand
Te Whatu Ora

Hastings District Council
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Tēnā koe,

Hastings District Council Local Alcohol Policy Review

This technical advice has been written by Health New Zealand | Te Whatu Ora National Public Health Service (Health NZ) in Hawke's Bay. The National Public Health Service is a directorate within Health NZ. Health NZ believes the consultation process provides an opportunity for public health perspectives to be considered by Council in planning and decision making. Incorporating public health aspects helps to support the health and wellbeing of our communities.

Health NZ has statutory obligations under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956 to improve, promote and protect the health of people and communities. Of particular focus for Health NZ is embedding Te Tiriti o Waitangi as its foundation toward improving health outcomes for Māori.

This advice aligns to Health NZ's commitment towards healthier and more resilient communities by reducing inequities and promoting good health, particularly for Māori, Pacific peoples, and disabled people. It also reflects the information and recommendations provided under section 78 of the Sale and Supply of Alcohol Act 2012 consultation with the Medical Officer of Health.

Health NZ welcomes the opportunity to speak to this technical advice.

For any clarification regarding this advice, please contact Dr Matt Radford

Nā māua iti nei,



Farley Keenan

Ngāti Kahungunu
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Dr Matt Radford

Medical Officer of Health
Te Matau a Māui | Hawke's Bay
National Public Health Service

Te Kāwanatanga o Aotearoa
New Zealand Government

General response to consultation

Health New Zealand commends Hastings District Council for its proactive approach to addressing alcohol-related harm through the Local Alcohol Policy (LAP) review. The proposed changes provide a strong foundation by offering clarity and consistency for both licence holders and the public. Health NZ supports the Council's commitment to strengthening the LAP with an equity-led approach, ensuring that the health and wellbeing of those most vulnerable to alcohol-related harm remain a priority.

Key supporting evidence on alcohol-related harm

Results from local research

An independent study conducted in 2016 surveyed 1,000 Hawke's Bay residents, including 251 from Hastings Central and surrounding suburbs and 149 from Flaxmere, with a particular focus on high-deprivation areas.¹ The study found that 66% of Hastings respondents believed alcohol has a "negative" or "very negative" impact on their community. Throughout this document, Health NZ refers to this research as the "community survey" and cites Hastings-specific data unless otherwise indicated.

Alcohol consumption in Hawke's Bay

Alcohol comes in various sizes and strengths, so standard drinks are used to quantify alcohol consumption. One standard drink contains 10g of alcohol, with common examples shown in Figure 1 ([see link for more details](#)).²

From when the last Hawke's Bay-specific data was available in 2019, 9 in 10 people (87%) drank alcohol at least once a year.³ Among these drinkers, one in four (28%) engaged in heavy episodic drinking (>6 drinks) at least monthly, which was the same as seen nationally (28%) at that time.³ More recent national data from 2024 shows a small decline in alcohol drinking but 23% of people still drink heavily at least monthly.⁴

APPROX. 10G PURE ALCOHOL

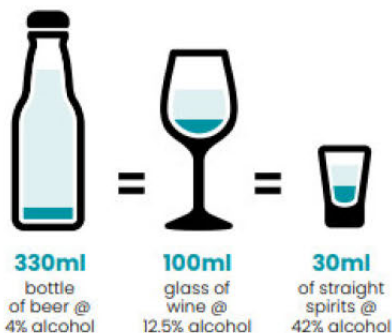


Figure 1: Size of a standard drink

How much alcohol is safe?

There is no safe limit of alcohol consumption, with every drink increasing the risk of harm.⁵ However, the national guidelines provide a guide which can reduce this risk (**Error! Reference source not found.**).



Figure 2: New Zealand guidelines for safe drinking

Important factors to consider

Alcohol is no ordinary commodity⁶ and causes the most harm in New Zealand of any drug.⁷ This includes both harms to users and others. When considering harms and decisions regarding the LAP, it is important to consider the below factors which are often overlooked.

- 1. Alcohol poses not only acute but also long-term harms.** This includes increasing the risk of many forms of cancer, including breast and bowel cancer, as well as increasing the risk of strokes and liver cirrhosis.⁸ Additionally, it is estimated that 600 children are born with foetal alcohol spectrum disorder in New Zealand each year.⁹
- 2. Alcohol has a large influence on mental health and suicide.** People with common mental health disorders, such as depression and anxiety, are twice as likely to report an alcohol use disorder than people without.¹⁰ Alcohol use is also linked to one in four suicides.¹¹
- 3. Alcohol-related harm is not limited to people with alcohol use disorders.** Seventy-two percent of alcohol-related harm costs are linked to drinking by people without alcohol use disorders.¹² This highlights the need for a population-based approach which can be supported through a strong LAP.
- 4. Alcohol harm affects certain populations more, but everyone is affected.** Māori are twice as likely to die from alcohol-related causes compared to non-Māori.¹³ People living in areas of high deprivation are 1.6 times more likely to drink hazarously.⁴ Also, men account for 83% of all alcohol-attributable deaths (753) nationally.¹³
- 5. Alcohol affects all of us.** While alcohol-related harm disproportionately affects certain groups, it impacts everyone. For example, high levels of harmful alcohol drinking is similar across ages 18–54 before declining with age.⁴ Alcohol-related hospitalisations and injuries are relatively evenly spread across all age groups.¹³ Those that do not drink can also be affected; for example, alcohol is associated with one in three crimes and one in four traffic injuries.¹⁶

6. Alcohol provides a source of income for the district, but also harms the economy.
Alcohol-related harm costs, on average, \$9.1 billion annually in New Zealand.¹²

On-licences: closing hours

Do you agree or disagree with the following changes:

1. Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs?

Yes. Health New Zealand supports reducing trading hours for nightclubs, bars, taverns and pubs from 3am to 2am. The Emergency Department (ED) data shows the highest alcohol-related harm is after 7pm, particularly on weekends.¹⁴ Alcohol harm data from police also highlights a spike in alcohol-related incidents in Hastings between 12am and 3am.¹⁵ People purchasing alcohol later in the evening are more likely to be heavy drinkers.¹⁶

Reducing trading hours is beneficial to reducing harm. The introduction of maximum trading hours in New Zealand in 2013 for both on- and off-licences (previously no time restriction) was associated with a decline in physical assaults documented by police and ED attendances.¹⁷ While unable to prove causality, there has been a drop in alcohol-related ED presentations post Napier and Hastings' previous LAP being implemented.¹⁵

The community survey showed that 51% of respondents wanted shorter opening hours for bars and pubs.¹ The proposed reduced hours are in keeping with other TLAs in Hawke's Bay (Wairoa: 9am to 1am for on-licences,¹⁸ Central Hawke's Bay: 8am to 1am for on-licences).¹⁹ Finally, this proposed reduction in hours will only affect around 5% of on-licence holders.¹⁵

2. If no, which option is the most appropriate closing time?

Not applicable.

3. Do you agree with the one-way door provision (where people cannot come in after a certain time)?

Yes. Health New Zealand supports the implementation of a one-way door restriction policy. This will reduce the available hours of drinking. A one-way door policy, meaning that people who leave a bar after a certain time are unable to go to another, will lead to some people going home earlier. This may reduce alcohol-related harm by reducing the time people spend drinking.

A one-way door policy is commonly used in LAPs. Wairoa and Central Hawke's Bay District Councils include a one-way door as a discretionary condition.^{18, 19} Eight LAPs in New Zealand have mandatory one-way door policies, and more have included them as a discretionary condition for on-licences.²¹

Do you agree with the following changes:

4. Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2.00am to 1.00am?

Yes. As stated above, Health NZ supports reducing hours for on-licences, particularly at this time of night as this has been evidenced to reduce alcohol-related harm.

5. If no, which option is the most appropriate closing time?

Not applicable.

6. Reduce the closing time for entertainment venues and function centres from 2.00 am to 1.00am?

Yes. Health NZ supports reducing hours for entertainment venues and function centres. See advice given in section 1 above for reasoning.

7. If no, which option is the most appropriate closing time?

Not applicable.

8. Any other comments:

No.

Off-licences: Hours generally

Do you agree with the following proposed changes:

1. A reduction in hours for off-licences generally

Yes. Health New Zealand supports reducing trading hours for off-licences.

There is a large potential benefit to this proposal: approximately 80% of alcohol consumption occurs from off-licence premises.²¹ The evidence above shows alcohol-related harm is greatest in the evening.^{14,16}

In addition, international studies have provided evidence of the association between reduced trading hours and reduced harm. In Norway, a study showed a 16% reduction in violent crime for every one hour reduction in on-licence hours.²² International studies found that implementing restrictions in off-licence trading hours was associated with lower consumption of alcohol and a significant reduction in hospital admissions for alcohol-related intoxication, especially in young people.²³⁻²⁵

The community survey also showed 54% of respondents wanted shorter hours for supermarket alcohol sales.¹ The proposed reduced hours are in keeping with other TLAs in Hawke's Bay (Wairoa: maximum trading hours for off-licences 10am to 9pm,¹⁸ Central Hawke's Bay: 9am to 11pm for off-licences).¹⁹

Off-licences: opening hours

2. Which is the most appropriate opening time for supermarkets?

Health NZ supports reducing alcohol trading hours for supermarkets to begin at 9am.

A reduction in trading hours may help to support the one in four people who drink hazardously in Hawke's Bay.³ Restricting alcohol sales to shorter hours than general supermarket trading times allows people to shop for groceries without being exposed to alcohol. People trying to reduce their alcohol consumption can shop at a time when they know they will not be tempted to purchase alcohol. Similar initiatives have been done with 'quiet hours' to support people who are neurodivergent.²⁶

3. Which is the most appropriate opening time for bottle stores and cellar doors etc?

Health NZ supports the continuation of a 9am opening time for bottle stores and cellar doors due to evidence discussed in section 2 above.

4. Do you think supermarkets should have the same hours as all other off licences (i.e. the same hours as bottle stores and cellar doors)?

Yes. Ninety percent of beer and wine purchases in Hastings are from supermarkets and grocery stores.¹⁵ It is important that supermarkets and grocery stores are treated the same as other off-licences. New Zealand analysis of the relationship between alcohol outlets and harm shows no evidence of a substantive difference in alcohol-related harm between alcohol sales from supermarkets when compared to other off-licence premises.²⁷

Respondents in the community survey ranked supermarkets second (51%) following bottle stores (65%) for the type of alcohol outlet perceived to cause the most harm (multiple responses allowed).¹

5. Any other comments:

No.

Off-licences: closing hours

6. Which option is the most appropriate closing time for supermarkets?

Health NZ supports a reduction in trading hours to 9pm. Health NZ also encourages Council to consider reducing the closing time further to 8pm. The evidence mentioned under on-licences in section 1 shows alcohol-related harm is greatest in the evening.^{14,16}

The Supreme Court ruling in 2023 on Auckland Council's Provisional LAP showed that a 9pm closing time (for off-licence premises) was not unreasonable in light of the Object of the Act and likely to reduce alcohol-related harm.²⁸ New evidence suggests that further reducing the opening hours for all off-licence premises from 9am to 8pm would further mitigate the risk of alcohol-related harm for Hastings communities.²⁹

As mentioned above with regard to opening hours, limiting alcohol sales to shorter hours than general supermarket trading times reduces the likelihood of shoppers encountering alcohol while

doing their regular grocery shopping. This may help to support the one in four people who drink hazardously in Hawke's Bay.³

7. Which option is the most appropriate closing time for all other off-licences?

Health NZ supports a reduction in trading hours to 9pm. Health NZ also encourages Council to consider reducing the closing time further to 8pm. All off-licence trading hours should be aligned.

8. Any other comments:

No.

Club licences

Do you agree with the following proposed changes:

1. A reduction in hours for smaller club licences (from 1am to 12am midnight)?

Yes. Health NZ supports a reduction in hours for the reasons stated previously about reducing alcohol-related harm.

2. If no, which option is the most appropriate closing time:

Not applicable.

3. Any other comments:

No.

Special licences

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences)?

Yes. Health NZ supports setting opening and closing times for special licences.

Like any other licence type, there is potential to increase alcohol-related harm without appropriate restrictions. The effects of hours of access on alcohol-related harms applies to special licences too. Very occasionally events may occur outside of standard special licence hours, for example Rugby World Cups. Examples like this have been addressed by amending national legislation.³⁰

2. Any other comments

No.

Discretionary conditions

1. Do you agree with the discretionary conditions generally?

Yes. Health NZ supports the list of discretionary conditions proposed. These provide flexible and tailored licence conditions in keeping with the range of risks that can occur within licence types. Listing them also normalises the conditions and helps applicants consider ways to reduce alcohol harm.

2. Any other comments

In addition to the listed conditions, Health NZ suggests further discretionary conditions be considered:

Club licences

1. **Having a certified manager onsite after 9pm and all nominated responsible persons having completed Serve Wise training.** International evidence review shows strong evidence of a reduction in alcohol-related harm related to effective workforce training.

Off-licences

1. **Restricting the use of Buy Now Pay Later options.** These can encourage impulse spending and increase alcohol accessibility.²² The Waikato LAP includes as a discretionary condition the consideration of “Whether ‘buy now pay later’ is an inappropriate method of payment for the sale and supply of alcohol purchased either remotely or on premises.”³⁴ Given the length of a LAP is up to six years, it is important to consider future challenges.
2. **Restrictions on alcohol advertising.** Prohibiting or greatly limiting (<25% of the façade) the display of alcohol-related marketing or signage (sandwich boards, bollards, sleeves etc.) on public footpaths outside or within the immediate vicinity of licensed premises. There is a causal relationship between youth alcohol initiation and heavy drinking and exposure to alcohol marketing.³⁵ National evidence shows that alcohol marketing is widespread in urban areas, with Māori and Pacific children disproportionately exposed.^{36,37} Advertising restrictions are a common condition in many LAPs.²² Central Hawke’s Bay has a discretionary condition for bottle stores of no external advertising signs/sandwich boards on outside footpaths.²¹
3. **Introducing tighter restrictions on remote sellers and on-demand alcohol delivery:**
 - a. Rigorous background checks and mandatory compliance audits, particularly for businesses with a history of violations.
 - b. Mandatory age verification for all customers who appear under 25 at both the point of purchase and upon delivery.
 - c. Two-hour delay before delivery to improve safety.

Stronger oversight of remote sellers and on-demand alcohol delivery could help prevent underage access and ensure responsible alcohol distribution across Hastings. Research

shows that easing access to online sales leads to increased hazardous drinking and the potential for illegal sales to occur.³⁹ In Australia, access to on-demand alcohol delivery increased the number of people who continue drinking at home when they normally would have stopped.³⁸

Special licences

4. **Prohibiting licences for events focused on children and young people under 18 years of age.** A 2014 study found that the 'European approach'ⁱ to drinking increases young people's likelihood to drink hazardedly at an earlier age.⁴⁰ Children and adolescents who are exposed to alcohol – either through witnessing adults drinking or via alcohol marketing – are more likely to start drinking alcohol both at an earlier age, and to drink more hazardedly.⁴¹ The Wairoa LAP includes: "Licences will not be granted for child-focused events. A child-focused event is an event that is centred around minors. This includes but is not limited to galas, children's sports games, school kapa haka events, etc."¹⁸
2. **Requirement that an alcohol-free area is available at events and provides an experience similar in quality to an alcohol area.** The community survey found that 77% of people wanted more alcohol-free entertainment.¹ Anecdotally, an alcohol-free area at a recent Taupo concert was well-received.
3. **Serve reduction systems in place to manage intoxication levels.** The ideal is maximum serves of two standard drinks per sale, reducing to one. The Wairoa LAP includes a condition "Limit on the type and/or size of drinks and the number of drinks per customer after a specified time".¹⁸ Health NZ event guidelines report serve reduction is an effective way to control the risk of intoxications.⁴² Note maximum serves is per standard drink, so people could still purchase more of low-alcohol options. For example, two standard drinks would equate to four 2% beers.

Location and density restrictions

1. Do you agree with the location and density conditions generally?

No. Health NZ considers there are too many alcohol outlets in Hastings, particularly off-licences. The availability of alcohol in Hastings is greater than the national average, with 259 total licences.¹⁵ This is 30% more licences than the national average, equating to one licence for every 331 Hastings residents,¹⁵ compared to one for every 434 residents nationally.¹⁴ This high level of availability raises concerns about the impact of alcohol-related harm in the community.

Off-licences contribute significantly to alcohol-related harm, with 76% of alcohol consumed by hazardous drinkers purchased from these premises.³³ A study on alcohol-related emergency department presentations found the most common place patients purchased alcohol was from off-licence premises.³⁴

ⁱ The 'European approach' to drinking refers to an approach where parental drinking exposes children to alcohol consumption, and children may be given small amounts of alcohol from a young age

Health NZ recommends Council considers expanding the current provisions restricting further off-licences in Flaxmere and Camberley to all of Hastings i.e. introducing a sinking lid policy. This approach would help reduce alcohol availability over time, mitigating the associated harms and promoting better health outcomes for Hastings residents.

Alcohol-related harm is evident in all parts of Hastings, as evidenced in police incident data by suburb.¹⁵ Hazardous drinking occurs across different demographics,⁴ reinforcing the need for broad regulation rather than targeting specific areas or population groups. Additionally, Hastings' compact size means most locations are within a 5-10 minute drive of an off-licence, further contributing to alcohol accessibility and associated harm.

The density of alcohol outlets is closely linked to increased harm. Both off-licence and on-licence premises contribute to a range of social harms, including police incidents and motor vehicle accidents.³¹ Research has also shown that the density of supermarkets and grocery stores selling alcohol is associated with a range of alcohol-related harms across the North Island.²⁷

Hastings has a high number of off-licences (111),¹⁵ exceeding other services such as pharmacies (17). Findings from the community survey support reducing alcohol availability, with 61% of Hawke's Bay residents wanting fewer bottle stores.¹ Off-licence premises density is associated with shorter travel distances, longer opening hours and price competition,³¹ which correlates with heavy episodic drinking and alcohol-related problems in communities.³²

Given these factors, Health NZ supports district-wide measures to reduce alcohol availability and its negative impacts. This includes not issuing any more off-licences i.e. a sinking lid approach.

2. Any other comments

Health NZ supports a Hastings wide restriction on new off-licences. Health NZ also supports continuation of the restrictions in Flaxmere and Camberley. Flaxmere and Camberley have high levels of alcohol-related harm, as evidenced in police data and ED admissions.¹⁵

Health NZ highlights the majority of alcohol-related presentations to Hawke's Bay Hospital's ED are from Decile 8–10 suburbs.¹⁴ Higher alcohol outlet density is linked to increased harm,^{36,37} therefore maintaining restrictions in Flaxmere and Camberley will help protect vulnerable communities and reduce alcohol-related harm.

Final questions

1. Any other comments about any other provisions within the LAP?

Yes. Health NZ supports the adoption of the LAP. Health NZ encourages Council to go further and incorporate the following suggested changes:

1. Hastings-wide restriction on the issuing of new off-licences.
2. Further reduction in off-licence trading hours to 9am–8pm for all off-licence types.
3. The introduction of additional discretionary conditions on licences.

2. Have you submitted to the Napier LAP review process?

Yes. Health NZ recommends the Hastings LAP closely aligns with the Napier LAP, which is also currently being consulted on. Misalignment between key provisions in the LAPs (for instance, hours of sale) may worsen alcohol-related harm.

Hastings District and Napier City are in close geographical proximity and are highly interconnected. Many licenced venues are close to the border of Hastings and Napier. It is a less than 20km journey between the Hastings and Napier CBDs and entertainment precincts. There are parts of Hastings District (e.g. Clive) where travel times are similar to reach both Hastings and Napier CBDs.

Differences in the LAPs may lead to people travelling to neighbouring suburbs which have more lenient conditions. This may increase the risk of alcohol-related harm and alcohol-associated road traffic accidents. Differences between LAPs may also make it more difficult to get buy-in from the public and reduce the likelihood of people accepting LAP conditions. It is easier for the public to be aware of one set of rules rather than two, particularly for visiting tourists.

Alignment between the LAPs will also make it easier for applicants. Applicants with licences across both councils will not have to compare the two LAPs and consider which conditions apply. Finally, alignment between the LAPs demonstrates to the public the ability of the councils to work together.

Once again, Health NZ commends Council on its proposed approach to minimising alcohol-related harm in the Hastings community. There are no further recommendations.

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#58

Submission to Hastings District Council

Re: Objection to Proposed Conditions on Special Licence Applications

Policy Proposal:

Restrictions on the type of drinks sold, the alcohol percentage of the drinks, the type of containers the drinks are served in, and implementation of serve reduction systems (maximum of 2 drinks per sale, reducing to 1).

To Whom It May Concern,

My name is Michael Swan, and I bring over 40 years of experience as a licensee, both in New Zealand and the United Kingdom. Since 2014, I have consistently applied for and held between 7 to 10 Special Licences annually, serving as both Licensee and Duty Manager.

From August 2014 to September 2023, I held the position of Licensee and Duty Manager at Spark Arena in Auckland. In addition, I have been responsible for the licensing and management of some of New Zealand's largest events, including Rhythm and Vines (85,000 attendees) and Synthony in the Domain (35,000 attendees).

Given the breadth and depth of my experience in the industry, I believe I am well qualified to provide informed commentary on the proposed changes to Special Licences currently under consideration by Hastings District Council.

I am writing to strongly object to the proposed restrictions that would apply to special license applications in Hastings, namely:

- Limiting the type of drinks sold,
- Restricting the alcohol percentage of drinks,
- Restricting the type of containers used,
- And introducing serve reduction systems that cap alcohol sales at 2 drinks per transaction, reducing to 1 drink later in the event.

These proposed changes are overreaching, impractical, and risk harming responsible event organisers, local businesses, and the wider community — without necessarily achieving the intended goal of reducing alcohol-related harm.

1. Serve Reduction Systems: Alters people behaviour and Counterproductive

The proposed “maximum of 2 drinks per sale, reducing to 1” sends a message of distrust to both patrons and organisers. It assumes everyone is a potential problem and removes the discretion of bar staff and managers to make decisions based on real-time context.

- **Operational impact:** This will create longer queues, frustrate attendees, and put unnecessary pressure on bar staff and security teams who must enforce a rule that does not account for group purchasing or individual responsibility.
- **Unintended consequences:** It may encourage “panic buying” or promote preloading — where patrons drink heavily before arriving to avoid perceived restrictions — undermining event safety and defeating the policy's purpose.

- **Patron experience:** It lowers the quality of the event experience and discourages responsible social drinking, particularly for groups or those enjoying food and entertainment in a controlled environment.
- **Overall Consumption:** Reducing serves doesn't affect alcohol consumption at an event. We have figures that show this, the same lineup at a music event that at one event had 4 serves and at the other serves were restricted to 2. Consumption per person at both events were almost identical.

2. Restricting Drink Type, Strength, and Containers: Unjustified Blanket Rules

- There is **no evidence base** justifying these restrictions specifically for events operating under special licenses in Hastings.
- The **one-size-fits-all** nature of this proposal disregards the wide variety of event formats and audiences — from family-friendly community festivals to cultural and food/wine events.
- The **economic and cultural impact** could be significant, especially for local producers and event organisers who rely on the ability to serve a diverse range of beverages in formats appropriate to their brand or audience.
- Many Events are financially reliant on sponsorship, restricting choice of beverage will make events unviable.

3. Existing Systems Are Already Robust

Special licenses are already subject to oversight by Police, licensing inspectors, and medical officers of health. Councils can and do set conditions tailored to each event — including service limits, security requirements, and drink offerings — based on risk. Imposing broad, inflexible restrictions overrides this well-functioning system and penalises compliant operators.

4. Focus Should Be on Behaviour, Not Beverages

The Council's focus should remain on minimising intoxication and managing poor behaviour — not micro-managing how drinks are served. The proposed restrictions shift the emphasis away from individual accountability and responsible service practices, and onto arbitrary limits that do little to prevent actual harm.

Recommendation:

I respectfully urge the Hastings District Council to reconsider the proposed conditions. Rather than impose broad, restrictive policies that are likely to have negative consequences for both event operators and the community, I recommend continuing the existing case-by-case licensing approach that allows for more practical, context-specific, and effective regulation.

If there is an opportunity to appear in person to deliver this submission I would like to attend.

Thank you for the opportunity to provide feedback.

#59

LOCAL ALCOHOL POLICY SUBMISSION FORM 2025



Personal details

First Name: *Konhai aroha*

Surname: *Kahika*

Postal address: [REDACTED]

Email: [REDACTED]

Daytime phone/mobile: [REDACTED]

Representing organisation or business: *Private.*

Hearing details

Do you wish to speak to council in support of your submission (10 minute allocation slots) ☐ Y ☐ N

If yes – how many speakers

Do you wish to give feedback in NZ sign Language? ☐ Y ☐ N

Do you want to give feedback in Maori? ☐ Y ☐ N

Preferred method: ☒ In person at the council ☐ Via conference call

Which area do you live in: ☒ Flaxmere ☐ Havelock North ☐ Hastings residential ☐ Rural ☐ Other

Submission questions

On Licences - Closing hours:

Do you agree or disagree with the following proposed changes:

- Reducing hours from 3am to 2am for nightclubs, bars, taverns and pubs? ☐ Y ☒ N
- If no, which option is the most appropriate closing time: ☐ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☒ 4am
- Do you agree with the one way door provision (where people can not come in after a certain time) ☐ Y ☐ N

Do you agree with the following changes:

- Reducing the closing hours for cafes, restaurants, wineries and winery restaurants from 2am to 1am? ☐ Y ☒ N
- If no, which option is the most appropriate closing time: earlier than ☒ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☐ 4am
- Reduce the closing time for Entertainment venues and function centers from 2am to 1am? ☐ Y ☒ N
- If no, which option is the most appropriate closing time: ☐ 11 pm ☐ 12am ☐ 1am ☐ 2am ☐ 3am ☒ 4am

8. Any other comments:

Lots of Aroha Kia koe, me whanau hoki

Arohanui Always Rowhi

Off Licences: Hours generally:

Do you agree with the following proposed changes:

- A reduction in hours for off licences generally ☒ Y ☐ N

PG1OF2

LOCAL ALCOHOL POLICY SUBMISSION FORM 2025

Off Licences: Opening hours:

2. Which is the most appropriate opening time for supermarkets? ☒ 7am ☐ 8am ☐ 9am ☐ 10am
3. Which is the most appropriate opening time for bottle stores and cellar doors etc? ☐ 7am ☐ 8am ☐ 9am ☐ 10am
4. Do you think supermarkets should have the same hours as all other off licences (ie. The same hours as bottle stores and cellar doors)? ☐ Y ☐ N

5. Any other comments:

TBC.

Off Licences: Closing hours:

6. Which option is the most appropriate closing time for supermarkets: ☐ 8pm ☐ 9pm ☐ 10pm ☒ 11pm
7. Which option is the most appropriate closing time for all other off licences: ☐ 8pm ☐ 9pm ☐ 10pm ☐ 11pm

8. Any other comments:

TBC.

Club Licences

Do you agree with the proposed changes:

1. A reduction in hours for smaller club licenses (from 1am to 12am midnight) ☐ Y ☐ N
2. If no, which option is the most appropriate closing time: earlier than ☐ 9pm ☐ 10pm ☐ 11pm ☐ 12am ☐ 1am ☐ 2am
3. Any other comments:

TBC

Special Licences

1. Do you think there should be opening and closing times set in the LAP for special licences (event licences) ☐ Y ☐ N
2. Any other comments:

TBC

Discretionary Conditions

Do you agree with the discretionary conditions generally? ☐ Y ☐ N

Any other comments:

TBC

Location and density restrictions

Do you agree with the location and density conditions generally? ☐ Y ☐ N

Any other comments:

TBC

Final Questions

1. Any other comments about any other provisions within the LAP?

TBC.

2. Have you submitted to the Napier LAP review process? ☐ Y ☐ N

**HERETAUNGA
HASTINGS** DISTRICT COUNCIL

hastingsdc.govt.nz
06 871 5000



Thank you for
your feedback, we
appreciate your
time

PG 2 OF 2

#60

[REDACTED] Policy for Special
Licenses [Case: eH5ZKf, Ticket: hOzYj9]

Kia ora,

Thank you for the opportunity to respond to the proposed changes to the Local Alcohol Policy (LAP). As the organisers of Boxing Day Festival and other music events in Hawke's Bay, we take our responsibility to provide safe, secure, and well-managed events extremely seriously.

We respectfully submit the following feedback, outlining the potential negative impacts these changes could have on both our operations and our ability to continue delivering

successful, well-regulated events in the region.

1. Impact to Madcap Music events

Economic and Operational Viability

The proposed restrictions on alcohol service limits (reducing from 4 to 2 drinks initially, then down to 1, present a significant financial impact:

- Alcohol revenue represents a critical income stream that directly offsets safety, production, and staffing costs.
- Reducing service limits at this scale could risk the financial viability of these events, particularly for boutique festivals like Boxing Day, where margins are tight and reinvested locally.
- Increased operational costs associated with stricter security-to-patron ratios, additional facilities, and compliance will compound this issue.

Audience Experience and Crowd Management

- Our events already implement comprehensive Alcohol Management and Harm Reduction Plans including drink serve limits, designated security and medical teams, ID checks, and alcohol-free family zones.
- Abrupt or excessive restrictions on drink limits could lead to unintended consequences such as higher pre-loading, increased crowd frustration, and negative public perception, ultimately compromising the calm, family-friendly environment we've carefully built over the years.
- Restricting service flexibility undermines our ability to manage licensed areas safely and efficiently, as our current controls are risk-based, dynamic, and tailored to different times of day and crowd behaviour.

2. Safety and Security Responsibilities Already in Place

We'd like to acknowledge that public safety is and always has been a priority at our events. Key existing safety and security measures we undertake include, but aren't limited to the following,

- Detailed Alcohol Management Plans and on-site alcohol harm minimisation strategies
- Professionally trained security personnel, managed to a risk-based ratio tailored to event phases (e.g. peak hours, family times)
- Clearly marked emergency access routes and liaison with emergency services for site-specific response planning
- On-site St John medical teams and a dedicated safety management team
- Secure, separate licensed areas with drink limits, staff briefings, ID checks, and visible security patrols
- Zero tolerance to intoxication, aggressive behaviour, or underage drinking, with documented incident response procedures
- Our long-standing track record demonstrates responsible event management that aligns with national best practice standards.

3. Broader Impact on the Hawke's Bay Events Landscape

If adopted without careful adjustments, these changes may:

- Deter new or growing events from choosing Hastings District as a host location, impacting regional tourism, hospitality, and community vibrancy.
- Restrict opportunities for events targeting family-friendly and boutique audiences, as operational restrictions may not reflect the lower-risk profile of events like Outfield.
- Negatively affect the reputation of Hawke's Bay as a supportive, progressive, event-

friendly region — something we've all worked hard to build.

4. Recommendations

We respectfully recommend:

- A tiered, risk-based licensing approach that recognises event size, audience profile, historical safety records, and proven management capability.
- Retain the current 4-to-2 drink serve limits for Class One events with demonstrated harm reduction strategies in place.
- Allow for flexibility in discretionary conditions based on proven risk management, rather than blanket conditions for all events.
- Continue to engage with experienced event organisers in shaping workable, evidence-based alcohol policies that support both public safety and sustainable event delivery.

Closing Remarks

We share the Council's commitment to maintaining safe, vibrant public events in Hastings District. However, to ensure both community wellbeing and a thriving local events economy, it is vital that alcohol management regulations are proportionate, risk-based, and informed by operational realities.

We are open and willing to work with Council officers to discuss workable alternatives that ensure public safety while supporting the sustainability and growth of Hawke's Bay events.

Ngā mihi, Reuben
Event Director
Madcap Music

#61

Officer note: proforma to Madcap Music

Subject: Submission on Proposed Changes to Hastings Local Alcohol Policy for Special Licenses [Case: x82Eyg, Ticket: d3tsjK]

Kia ora,

Thank you for the opportunity to respond to the proposed changes to the Local Alcohol Policy (LAP). As the organisers of Outfield Music, Food & Arts Festival , we take our responsibility to provide safe, secure, and well-managed events extremely seriously.

We respectfully submit the following feedback, outlining the potential negative impacts these changes could have on both our operations and our ability to continue delivering successful, well-regulated events in the region.

1. Impact on Outfield Festival

Economic and Operational Viability

The proposed restrictions on alcohol service limits (reducing from 4 to 2 drinks initially, then down to 1, present a significant financial impact:

- Alcohol revenue represents a critical income stream that directly offsets safety, production, and staffing costs.
- Reducing service limits at this scale could risk the financial viability of these events, particularly for boutique festivals like Outfield, where margins are tight and reinvested locally.
- Increased operational costs associated with stricter security-to-patron ratios, additional facilities, and compliance will compound this issue.

Audience Experience and Crowd Management

- Our events already implement comprehensive Alcohol Management and Harm Reduction Plans including drink serve limits, designated security and medical teams, ID checks, and alcohol-free family zones.
- Abrupt or excessive restrictions on drink limits could lead to unintended consequences such as higher pre-loading, increased crowd frustration, and negative public perception, ultimately compromising the calm, family-friendly environment we've carefully built over the years.
- Restricting service flexibility undermines our ability to manage licensed areas safely and efficiently, as our current controls are risk-based, dynamic, and tailored to different times of day and crowd behaviour.

2. Safety and Security Responsibilities Already in Place

We'd like to acknowledge that public safety is and always has been a priority at our events. Key existing safety and security measures we undertake include, but aren't limited to the following,

- Detailed Alcohol Management Plans and on-site alcohol harm minimisation strategies
- Professionally trained security personnel, managed to a risk-based ratio tailored to event phases (e.g. peak hours, family times)
- Clearly marked emergency access routes and liaison with emergency services for site-specific response planning
- On-site St John medical teams and a dedicated safety management team
- Secure, separate licensed areas with drink limits, staff briefings, ID checks, and visible security patrols
- Zero tolerance to intoxication, aggressive behaviour, or underage drinking, with documented incident response procedures
- Our long-standing track record demonstrates responsible event management that aligns with national best practice standards.

3. Broader Impact on the Hawke's Bay Events Landscape

If adopted without careful adjustments, these changes may:

- Deter new or growing events from choosing Hastings District as a host location, impacting regional tourism, hospitality, and community vibrancy.
- Restrict opportunities for events targeting family-friendly and boutique audiences, as operational restrictions may not reflect the lower-risk profile of events like Outfield.
- Negatively affect the reputation of Hawke's Bay as a supportive, progressive, event-friendly region — something we've all worked hard to build.

4. Recommendations

We respectfully recommend:

- A tiered, risk-based licensing approach that recognises event size, audience profile, historical safety records, and proven management capability.
- Retain the current 4-to-2 drink serve limits for Class One events with demonstrated harm reduction strategies in place.
- Allow for flexibility in discretionary conditions based on proven risk management, rather than blanket conditions for all events.
- Continue to engage with experienced event organisers in shaping workable, evidence-based alcohol policies that support both public safety and sustainable event delivery.

Closing Remarks

We share the Council's commitment to maintaining safe, vibrant public events in Hastings District. However, to ensure both community wellbeing and a thriving local events economy, it is vital that alcohol management regulations are proportionate, risk-based, and informed by operational realities.

We are open and willing to work with Council officers to discuss workable alternatives that ensure public safety while supporting the sustainability and growth of Hawke's Bay events.

Ngā mihi, Reuben
Event Director
Outfield Music, Food & Arts Festival



#62

29 November 2024

Janine Green
Licensing Inspector
Hastings District Council

Dear Janine

Thank you for providing us with the opportunity to submit feedback as you review the current Local Alcohol Policy.

Our feedback focuses on the main areas of, hours of operation for On-Licence and Off-licence premises.

Police believe that the maximum trading hours should be between:

- 8am and 2am the following morning for on licensed premises and One way door condition from 1am (or one hour before close)
- 9am to 9pm on the same day for off licensed premises.

There is strong international and domestic evidence that supports the proposition that the longer licensed premises are open, the more alcohol related harm that can be attributed to them.

Police believe that off licences contribute to alcohol related harm by among other things facilitating pre and side loading. Reducing the hours of trading for off licenses will reduce the availability of alcohol and consequent alcohol related harm associated with pre and side loading.

Reductions in hours of sale for both on and off licensed premises are associated with reduced alcohol harm.

As well as this rates of violence in and around entertainment precincts are clearly affected by changes to trading hours late at night.

Police believe a menu of discretionary conditions together with guidelines for their use, should also be available to licensing authorities as part of the Local Alcohol Policy.

A priority discretionary condition for off licences is “no single serve sales to be sold for less than \$6 (amount to be revised for inflation at renewal)”. This is particularly for premises in high deprivation areas, communities with high proportions of younger people (under 25 years olds), and within Māori and Pacific communities.



Restrictions regarding the following discretionary conditions together with guidelines for their use should also be considered for inclusion as a tool for licensing authorities as part of the Local Alcohol policy:

- Presence of working CCTV including the holding of recordings for at least 28 days
- Prescribed ratio of security staff to patrons
- Size and quantity of alcohol containing drinks after midnight e.g. shots, doubles, single serve sales only.
- No glass containers after midnight
- High visibility clothing to be worn by security staff and be visible to others.
- Certified manager to be on duty at specific times (club and BYO licences)
- Compliance with approved Host Responsibility Policy (on licences) or Social Responsibility Policy (off licences)
- No external alcohol related advertising (including branding) other than the trading name of the premises.
- Ensure at least 50% of store front glazing is clear.
- Exterior lighting
- Specific definition of large events requiring the provision of Alcohol Management Plans
- Provisions to manage outside areas and/or queues.
- Keeping an incident log, ensuring it is kept up to date and providing it to the reporting agencies on request.
- Mandatory reporting of violent incidents to Police
- Provision of transport (areas lacking in public transport options)
- Cessation of entertainment at a specified time
- Noise control management plans
- Food requirements (special licenses)
- No more than 2 standard drinks per serve (events)
- Display of particular products e.g. RTDs and high strength products
- Display of promotions and discounts

If you would like to discuss this further, please do not hesitate to contact me.

Yours sincerely



Andrew Sloan
Eastern District Prevention Manager.