

***Local Alcohol Policy Review 2023***  
***Summary of feedback***

**To support hearings 3 August 2023**

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## 1. Summary of feedback received

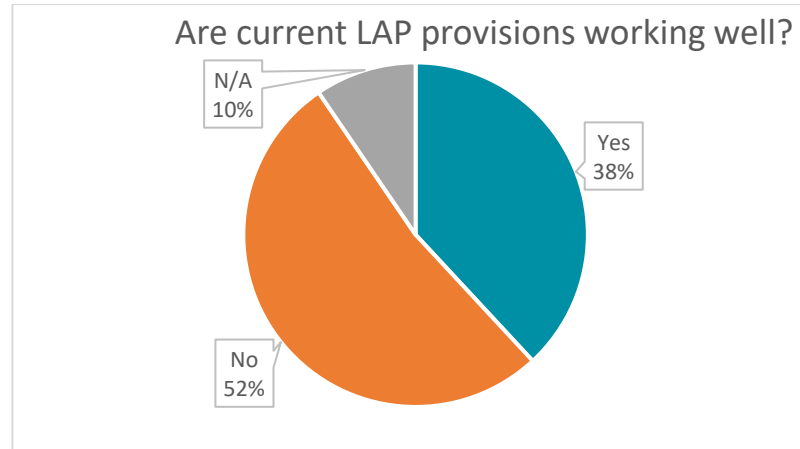
Public consultation on the Local Alcohol Policy was undertaken from Thursday 14 June to Friday 14 July 2023.

- A total of 42 submissions were received.
- 8 submitters indicated they wanted to be heard on the submission form (7 confirmed attending as at 26 July 2023).

## 2. Current LAP provisions working well?

Based on the question “Do you think our current provisions in the Local Alcohol Policy are working well?”

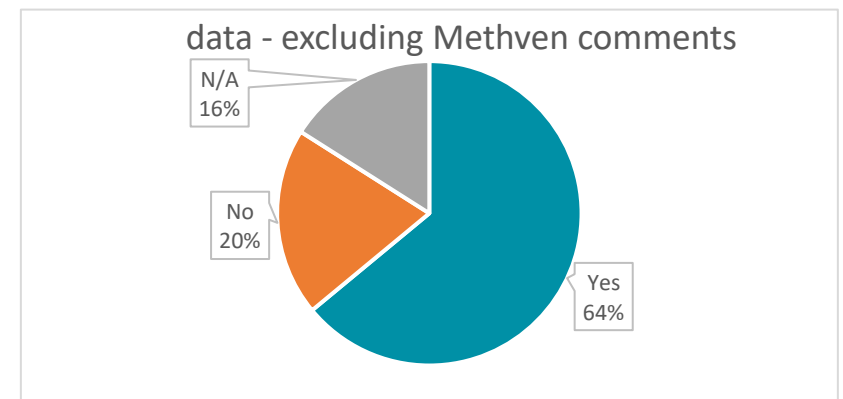
	Number of people
Yes	16
No	22*
N/A	4
<b>Total</b>	<b>42</b>



\*NOTE: approx. 17 of the submissions that indicated 'no' at the question 'Do you think our current provisions in the Local Alcohol Policy are working well?' are referring in their submission to the early closing hours of the pub(s) in Methven.

The current policy provides for on-licences, like pubs, to be open till 2.00 am and to have a one-way-door policy starting at 1am. Individual businesses may decide to close earlier than 2.00 am, as in Methven.

If these submissions are excluded from the statistics, 64% state that the current LAP provisions are working well, 20% would say it does not work well and 16% no answer.



## 2.1 Comments on why submitter feels the current provisions are or are not working well

Submitter name	Page	Summary	Staff comments
<b>Yes, working well</b>			
BRINKLEY RESORT (CRESWICK, Paul)	<b>35</b>	<ul style="list-style-type: none"> <li>Works well for us</li> </ul>	
BEAUCHAMP, Shane	<b>32</b>	<ul style="list-style-type: none"> <li>States there are not many problems as he is aware.</li> </ul>	
Ellen	<b>48</b>	<ul style="list-style-type: none"> <li>Thinks it is a fair middle ground between keeping business going and safe alcohol consumption.</li> </ul>	
Anonymous 6	<b>15</b>	<ul style="list-style-type: none"> <li>It's worked until now</li> </ul>	
NZ POLICE (ROBERTSON, D)	<b>69</b>	<ul style="list-style-type: none"> <li>The current LAP is appropriate and reflects conditions in place to minimise alcohol related harm. In particular the restriction on trading hours and one-way door policy contribute to this.</li> </ul>	
CLUBS NEW ZEALAND (GRAHAM, Larry)	<b>41</b>	<ul style="list-style-type: none"> <li>Clubs New Zealand supports the councils view to retain its current policy.</li> <li>We do urge the council to note the contribution that the districts clubs make to the community, that they are far more than bars and are aimed at bringing people together to share in common interests.</li> </ul>	
GENERAL DISTRIBUTORS LIMITED (RADICH, Paul)	<b>54</b>	<ul style="list-style-type: none"> <li>GDL supports the objectives of minimising alcohol-related harm in the district and the general use of local alcohol policies as a tool for Council to assist with the safe consumption of alcohol.</li> <li>GDL supports the retention of the current LAP, particularly as it relates to supermarkets.</li> <li>GDL supports the current LAP as currently drafted and agrees with Council that the LAP has worked well since it first came into force on 28 August 2017. Retention of the LAP as drafted will enable GDL's stores in the Ashburton region to continue to trade in an efficient and responsible manner. GDL sees no need for the LAP to be amended.</li> </ul>	
SUPER LIQUOR HOLDINGS (HOAR, Greg)	<b>77</b>	<ul style="list-style-type: none"> <li>Super Liquor Holdings believes the current LAP is working well and supports the Council's proposal to make no amendments to the existing LAP.</li> </ul>	
BRAIDED RIVERS COMMUNITY TRUST (REID, Robert)	<b>34</b>	<ul style="list-style-type: none"> <li>For the most part, yes the provisions do work well. There are however improvements that can be made. (See 3.1)</li> </ul>	

Submitter name	Page	Summary	Staff comments
ASHBURTON CITIZENS ASSOCIATION (FAVEL, Donna)	30	<ul style="list-style-type: none"> <li>The Ashburton Citizens Association think that the Ashburton District Council current provisions in the Local Alcohol Policy are working well. Members of the Ashburton Citizens Association, seldom see or hear of drunk &amp; disorderly behaviour and realise the current provisions are instrumental in maintaining this.</li> </ul>	
<b>No, not working well</b>			
TRAIL, Alexandra	87	<ul style="list-style-type: none"> <li>Because minors still manage to buy alcohol</li> </ul>	
RISK, Roberta	71	<ul style="list-style-type: none"> <li>Easily accessible alcohol in neighbourhoods. Should only be in town.</li> </ul>	
BROWN, Philip	37	<ul style="list-style-type: none"> <li>People are being killed by the current policy. There has been no change to the number of deaths on our road over the past several years. The current policy is not working. If people were killed on a work site, there would be measures taken to avoid further deaths.</li> <li>Last year a local member of our community was killed in a vehicle accident where all occupants had been drinking excessively. It was only by sheer luck that more people in the vehicle were not killed. When people drink alcohol their ability to make a sound judgement becomes very blurred. Quite plainly they don't know what they are doing.</li> <li>There should be controls on the outlet selling the alcoholic beverages. They should bear some of the responsibility for the actions of their customers. We all know the harm that alcohol causes and it is long overdue to dispel the booze culture that prevails.</li> </ul>	
BRUCE, Mary	39	<ul style="list-style-type: none"> <li>Too many outlets</li> </ul>	
TE WHATU ORA (BARRY, Vince)	79	<ul style="list-style-type: none"> <li>Te Mana Ora supports Ashburton District Council continuing to have an LAP. However, Te Mana Ora recommends that Council make changes to the policy to strengthen the current LAP which are consistent with national and international evidence on reducing harm from alcohol.</li> <li>Best practice and current evidence would support amendments to the existing LAP to reduce trading hours of off-licensed premises, reduce outlet density through caps on new licences and creating buffer zones around sensitive sites. These measures contribute to reducing the accessibility and availability of</li> </ul>	

Submitter name	Page	Summary	Staff comments
		alcohol and offer protection for vulnerable people from the risk of exposure to alcohol promotion.	
ALCOHOL HEALTHWATCH (WILLIAMS, Rebecca)	3	<ul style="list-style-type: none"> <li>• Restricting the local availability of alcohol is a pro-equity, evidence-based intervention to reduce the level of, and inequities in, alcohol harm in the Ashburton District.</li> <li>• Alcohol Healthwatch commends the Ashburton District Council on their commitment to review the 2017 Local Alcohol Policy (LAP). However, we encourage the Council to reconsider the proposal to roll over the current LAP with no change.</li> <li>• We suggest that the LAP needs to be revised and strengthened to reflect current evidence/ data<sup>1</sup> and the overall health indicators for the district, particularly where they have changed since the LAP was first adopted six years ago. Importantly, a LAP should respond to the needs of the community, and be supported by evidence for reducing alcohol-related harm.</li> <li>• We feel that the Council has not made the best use of the opportunity to add further measures in preventing alcohol-related harm, and has not considered factors that may have led to a substantial reworking of the LAP including: <ul style="list-style-type: none"> <li>- The Supreme Court decision on the Auckland Council Proposed LAP</li> <li>- The Sale and Supply of Alcohol (Community Participation) Amendment Bill and Select Committee Report and,</li> <li>- The desirability of ensuring greater consistency and synergy with LAPs (and proposed LAPs) in Canterbury and Aotearoa New Zealand (Aotearoa).</li> </ul> </li> <li>• In addition, we recommend that Ashburton's LAP should include policies on proximity to other licensed premises and sensitive sites, and restrict further licences, for example, by way of caps or sinking lid policies. The LAP's maximum trading hours and discretionary conditions should also be amended to give greater protection from alcohol-related harm.</li> </ul>	
<b>Licensing</b>			
ANONYMOUS 1	9	<ul style="list-style-type: none"> <li>• Submitter asks to make it easier for small businesses to sell alcohol in a restaurant as well as takeaway. Selling alcohol with food in a restaurant and being able to sell the same to guests to takeaway under one license for a small business to afford would be great. Instead of having to pay for an on &amp; off</li> </ul>	Under the Sale and Supply of Alcohol Act 2012 an off-licence may only be issued to the holder of an On-Licence for a hotel or tavern.

Submitter name	Page	Summary	Staff comments
		license. Surely there could be an amendment in the business that is applying to do this. Such as gift baskets and hampers delivered with alcohol can be from a licensed premises. Same host responsibility policy, checking ID etc	
<b>Trading hours</b>			
Anonymous 8	<b>18</b>	<ul style="list-style-type: none"> <li>'You are pushing people onto the streets where more crime is happening than before. I feel less safe in my community because of this policy.'</li> </ul>	
<b>Methven</b>			
Anonymous 7	<b>16</b>	<ul style="list-style-type: none"> <li>I believe Methven pubs should be allowed to stay open a bit later we are a resort town and have many domestic and international tourist coming through and visiting and bars are forced to shut very early compared to other tourist destinations around NZ.</li> </ul>	<p>The Local Alcohol Policy currently states the following trading hours for on-licences:</p> <ul style="list-style-type: none"> <li><b>- taverns (bars, pubs and nightclubs):</b> Monday – Sunday 7.00am – 2.00am the following day</li> <li><b>- restaurants or café:</b> 7.00am – 1.00am the following day</li> <li><b>- footpath areas (tavern, restaurant or café):</b> 7.00am – 12.00am (midnight)</li> </ul> <p>This allows pubs in Methven to stay open till 2.00am.</p> <p>The current on-licence for The Blue Pub allows them to stay open till 2:00am, with a one-way-door policy at 1:00am. The footpath area is the only area that needs to close at 12:00am (midnight). If they close the indoor area earlier, this is by their own choice.</p>
DONNELLY, Camille	<b>44</b>	<ul style="list-style-type: none"> <li>The fact that a small town (Methven) where hospitality is one of the main draws to the town, and the new policy where they cannot have anyone on council land after 11pm and have to have all patrons out by 12am is ridiculous, you are cutting them off at the knees for no good reason. It negatively affects the township and the local hotels and needs to be rectified so that those that come</li> </ul>	See above



Submitter name	Page	Summary	Staff comments
		here and would like to have a night out that doesn't involve being chucked out on the street early.	
ROBERTS, Charlotte	73	<ul style="list-style-type: none"> <li>As soon as patrons are kicked out early there is more trouble around town than there has ever been. Being able to keep these people in a controlled environment would be a much better option. Also for our local businesses it is so hard on them to not have as long of business hours as they once had. It is no fun for anyone leaving at 12 and leaves a lot of young people out causing trouble looking for something to do when the night hasn't even begun.</li> </ul>	See above
Jane	58	<ul style="list-style-type: none"> <li>Not fixing the problem if you just push it out to the dark corners of the district</li> </ul>	Noted
HOLLAND, Genevieve	56	<ul style="list-style-type: none"> <li>In some cases, areas like Methven is safer to have the local bars and establishments open later due to the amount of people who then choose to leave and have house parties following the closing hours. This only acts as a hinderance to neighbours around late at night, with more people wandering the streets during early hours of the morning.</li> </ul>	See above
Faye	50	<ul style="list-style-type: none"> <li>I believe that for a town that promotes tourism and encourages visitors to our district the current policy is too restrictive. Closing the pubs in Methven at midnight, promotes people to go back and have house parties, it's "early" for many people. I'm not saying we should go mad and open till 2am or 3am like the old days but I would say a closing time of 1pm would be much more reasonable for a Friday and Saturday night. Both pubs the Blue and Brown encourage dining which usually finished around 9ish at the weekend and they promote live music for locals and tourists, visitors alike, which ideally starts at 10pm for a 2hour set, closing at 1pm would allow for this. Having at least 1 pub open late also encourages people to go out instead of having house parties, upsetting neighbours etc.</li> </ul>	See above
Filip	52	<ul style="list-style-type: none"> <li>Current closing times for pubs like the blue or brown are too early. So more people drinking at home without controlled manner.</li> </ul>	See above
Anonymous 9	20	<ul style="list-style-type: none"> <li>Quite often myself and a group of mates drink late at the blue pub regularly before the new policy came in. Now we go elsewhere/ to a mates house instead which we find inconvenient and a loss for the blue pub!</li> </ul>	See above
Maddy	62	<ul style="list-style-type: none"> <li>Why do pubs now have to close at 12am. All this has done has taken away the controlled drinking environment and people now walk around the streets being</li> </ul>	See above

Submitter name	Page	Summary	Staff comments
		<p>loud and damaging property. House parties are now huge too. What happened to the pub staying open till 3am then everyone just goes home.</p>	
Anonymous 10	<b>21</b>	<ul style="list-style-type: none"> <li>Mid Canterbury, especially Methven, is an amazing draw card in the tourist season, which looks to be extending into the summer season, people from all over the world come to enjoy what the district has to offer, especially skiing, there are also hundreds of staff helping to maintain the ski fields that deserve the luxury of having a choice of establishments to relax and enjoy a drink, relax and catch up with others. Hospitality has been hit incredibly hard in the last few years, and if allowing them to stay open later to try and recoup some of their losses, then I'm all for extended/flexible trading hours.</li> </ul>	See above
McCulloch, Jane	<b>64</b>	<ul style="list-style-type: none"> <li>Living in Methven with the Ashburton District Council Alfresco dining policy that came in effect in March is beginning to impact the township. With the early closure of the Blue and Brown Pubs, there has been an increase in late house parties at Air B &amp; B homes - disturbing local residents. It also makes for a mass exodus of the pub at one time rather than scattered throughout the night as they ready to head home. Having a controlled environment for people to socialise is a part of the attraction to having people visiting our area. We are very lucky to have the Blue Pub hosting live bands every weekend, it is helping make Methven a place to visit after seeing many of the Mid Canterbury attractions. Having an early closing time is not helping attract visitors to our town and area which is to the benefit of us all.</li> </ul>	<p>There is no reference to trading hours in the Use of Footpath for Alfresco Dining Policy.</p> <p>See comment above on trading hours in the Local Alcohol Policy, including the footpath areas.</p>
Anonymous 11	<b>23</b>	<ul style="list-style-type: none"> <li>The blue pub being forced to close at midnight is ridiculous. All it does is force drunk people onto the street with nowhere to go.</li> </ul>	See above
Sam	<b>75</b>	<ul style="list-style-type: none"> <li>The closure of the pubs in Methven at earlier times causes more house parties and disorderly behaviour around town earlier in the night. This increases the potential for unsafe drinking/unruly behaviour.</li> </ul>	See above
Anonymous 12	<b>24</b>	<ul style="list-style-type: none"> <li>Methven is now starting to get people from out of town coming for the weekend again, to ski, and also enjoy the hotpools and the local area. By telling the pubs that they need to stop people entering at a certain time and also closing earlier, there is the risk of people choosing to drive through Methven and stay elsewhere. Locals are restricted and people from outside of town may choose to go elsewhere. Bands are not getting to play for as long as they wish, and with a serious lack of live music places in the area this is a huge drawback for</li> </ul>	See above

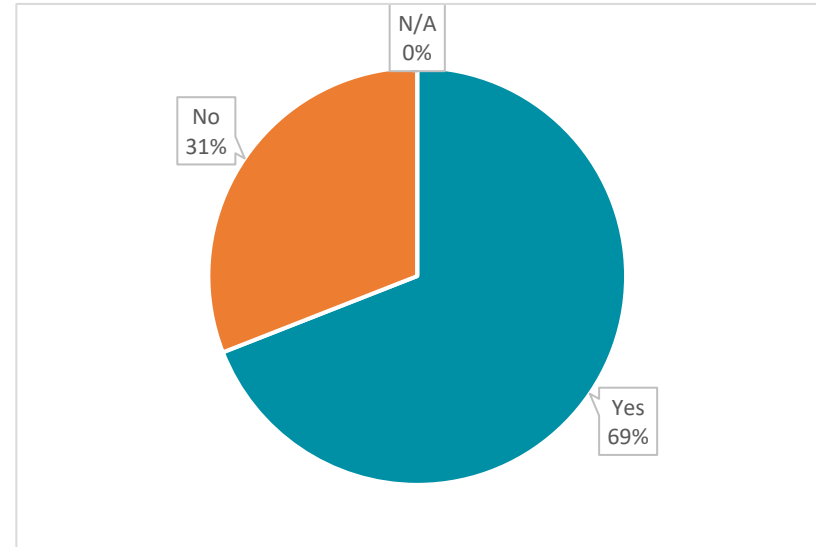
Submitter name	Page	Summary	Staff comments
		<p>Methven. It used to work, so there is no need for this crackdown. Look at the article on Stuff today about Methven Vs Tekapo  <a href="https://www.stuff.co.nz/travel/experiences/snow-ski-holidays/132499865/nz-ski-town-face-off-methven-vs-takap">https://www.stuff.co.nz/travel/experiences/snow-ski-holidays/132499865/nz-ski-town-face-off-methven-vs-takap</a></p> <p>We are on the map, but do not want to risk this opportunity and become a ghost town with people just heading into Christchurch after skiing here.</p>	
Anonymous 13	26	<ul style="list-style-type: none"> <li>• I live in Methven, and I fiercely object to people of all ages being left nowhere to go and socialise past 11:30pm on any night of the week (particularly Friday and Saturday nights) due to the current local alcohol policy. It needs to go back to 1:00am - 2:00am closing time like it used to be - ask anyone from Methven who goes for a night out in town on a regular basis, and they will tell you how devastatingly wrong it is that everything is forced to close down so early (all due to the current local alcohol policy!). The currently ridiculous policy, and the associated laws / enforcement that compliment it, are giving rise to people both young and old going on from the pubs that need to close early (to suffice by-laws, avoid fines etc) and attending adhoc informal parties based at suburban houses across the township and it's outskirts. These private, yet lawful, after hours gatherings on private properties are starting to increase in frequency and are giving rise to increased 'disturbances and anti-social behaviors' that continue well into the night (noise, littering, yelling, loud music, removing road signs etc) right across the residential community -- rather than these people being able to continue to socialise until a more reasonable time beyond 11:30pm at any of the centrally located (AND ACTIVELY CONTROLLED) venues such as the majority of the pubs in Methven (located away from most of Methven's residential housing).</li> <li>• Transports home from a centrally located venue(s) will also be much safer (ie. if people are out until 1am - 2am at a centrally located pub, they will then generally go directly home as per pre-arranged transport) rather than having multiple people leaving the pubs (part way through their night out!) and going on to other adhoc and hastily arranged private gatherings / parties held in private homes across the community (which undoubtedly will see them staying out for longer and drinking even more than they would in the pubs!!!) before then driving back to their own Methven based homes and/or remotely located rural homes (in hastily arranged, impromptu transport options because it's late!). With no public transports such as taxi's / uber's available, it's not hard to</li> </ul>	See above

Submitter name	Page	Summary	Staff comments
		<p>see how this will very likely lead to an increase in the amount of people willing to risk it and drink drive back from private parties to their own homes (ie. your current law will likely contribute to drink driving occurring more frequently over time!).</p> <ul style="list-style-type: none"> <li data-bbox="712 339 1644 938">• The current local alcohol policy is also impacting our licensed premises to their detriment, and to the detriment of community as a whole - especially in winter time which is peak season for many businesses here in Methven due to it being ski season. I have witnessed firsthand the bar staff copping flack for seemingly closing early in the night because people are just starting to enjoy themselves and then - bang - they've gotta be out of the premises within 15 - 30 minutes!!! Whilst this is not good for the bar staff, you also need to bear in mind the adverse affects that this current needless early closing will very likely be having upon Methven's bar's and eateries as it decimates their trading / profitability I'm sure! As a last, and I've only been mentioning local patrons and businesses up until this point ... but I have been in countless conversations with visiting tourists who believe that it is not only poor form to be closing so early, but that they will certainly NOT BE COMING BACK METHVEN - a ski town that has no night life after 11:30pm! People want to come to Methven for a good time on weekends ... and whether you like it or not, having a few drinks and being merry has always been - and will continue to be - a big part of that! Without doubt, our current Local Alcohol Policy is directly responsible for currently killing Methven's nightlife and tourist trade - THIS MUST END!</li> <li data-bbox="712 954 1644 1310">• In sum, the council MUST hear the outcry from the Methven community about the adverse effect that the current Local Alcohol Policy is having upon our town, it's night life, businesses, the community and tourism in general. The best course of action from here is to amend the current local alcohol policy so that the businesses and nightlife of Methven can once again flourish like they once did prior to the current policy and it's recent enforcement (as has become starkly more obvious since approximately the last quarter of 2022 (bearing in mind that the 'Covid Years' were not, and cannot, be seen as standard years ie. Council need to amend the policy so that it allows for, and promotes, the chance for the Methven nightlife to go back to how they used to be prior to 'the Covid years').</li> </ul>	

### 3. Changes to the current policy?

Based on the question “Would you like to see any changes to the current policy?”

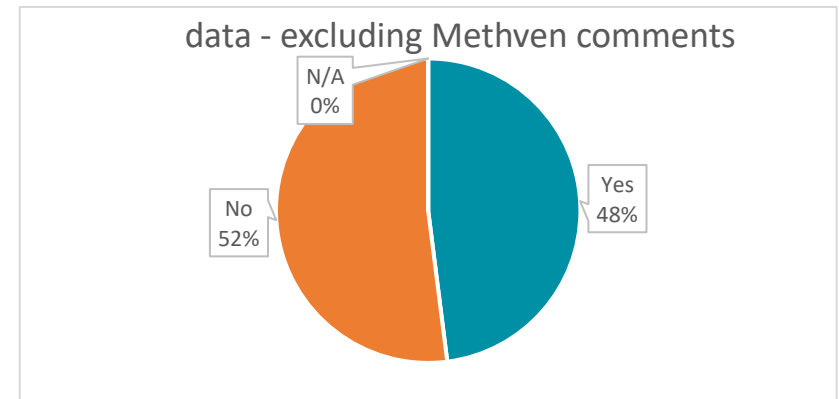
Location	Number of people
Yes	*29
No	13
N/A	0
<b>Total</b>	<b>42</b>



NOTE: approx. 17 of the submissions that indicated 'yes' at the question 'Would you like to see any changes to the current policy?' are referring in their submission to the early closing hours of the pub(s) in Methven.

The current policy provides for on-licenses, like pubs, to be open till 2.00 am and to have a one-way-door policy starting at 1am.

If these submissions are excluded from the statistics, 52% state that they would like to see any changes to the current policy, 48% would not like to see any changes.



### 3.1 Comments on which changes the submitter would like to see to the policy:

Submitter name	Page	Summary	Staff comments
Anonymous 2	11	<ul style="list-style-type: none"> <li>I would like to see Supermarkets not being able to sell any alcohol whatsoever. It sickens me to see trolleys rolling through the checkouts with more alcohol in them than food items for their families. Children are wondering around with their parents putting bottles of wine and boxes of beer into the trollers thinking that it is normal to have drugs to add to your food items. Alcohol shops do not normally have children trailing along with the parent in a separate place to sell alcohol and they don't have it ingrained in their little brains it is normal to be buying this stuff that causes so much damage to families. I.E. Violence, Arguments, less food for the family because it is spent because of an addiction the adult has to it. The cause of many traffic accidents, divorce. Dying way to young, and leaving a young family. Loosing jobs over it. The list goes on.</li> <li>The Government and the Councils all have certain age groups in them that are heavy sociable drinkers and don't think they can do without the stuff. So they are all in favour of having as much of it as freely available they can to get their hands on it. They don't realise the heartbreak and sadness it can cause others that have to live with these people who can't leave it alone or go without it for more than a day. It changes their whole personality when they are on it and nothing else matters to them. I have lived with a father that drank a half gee a night. I never liked him when he was on it. But when he was sober he was quite nice and even realised I existed. But when they are on it family don't matter. The less and the harder it is to get the better. But I suppose the hierarchy are making big bucks out of it, with fines etc. Taxes on it and GST. So people don't matter but money does doesn't it?</li> </ul>	
BROWN, Philip	37	<ul style="list-style-type: none"> <li>Sellers of alcoholic beverages to bear some of the responsibility for their patrons. There needs to be a change to the booze culture in this Country.</li> <li>Advertising needs to be banned on alcoholic beverages. The alcohol industry advertisements have an underlying theme of drinking being a man's way to live. The tobacco advertising would say how healthy smoking was for one's health. It</li> </ul>	Advertising is controlled by government legislation, and council has no control over this aspect

Submitter name	Page	Summary	Staff comments
		is long overdue for the alcohol industry to be exposed for the harm that they are causing to our people.	
BRAIDED RIVERS COMMUNITY TRUST (REID, Robert)	34	<ul style="list-style-type: none"> <li>Preventing alcohol-related harm must be a key consideration and to be clear we firmly believe this must be a primary focus when considering this plan.</li> <li>There should however be consideration given to promoting an inviting and vibrant hospitality scene in our district. These two objectives go in hand. Part of providing an inviting and vibrant hospitality scene includes steps being taken to minimise harm.</li> </ul>	
<b>CAP</b>			
EASON, Ed	46	<ul style="list-style-type: none"> <li>For the size of Ashburton, does not think we need any more outlets other than what we have now.</li> </ul>	
RISK, Roberta	71	<ul style="list-style-type: none"> <li>Less bottle stores.</li> </ul>	
BRUCE, Mary	39	<ul style="list-style-type: none"> <li>Set a Cap on the number of outlets.</li> </ul>	
TE WHATU ORA (BARRY, Vince)	79	<ul style="list-style-type: none"> <li>Te Mana Ora recommends that the LAP adopts a provision that controls alcohol licence density in the Ashburton District by introducing a cap on new licences. Reducing the density of alcohol outlets is an effective measure for reducing the availability of alcohol and alcohol harm.</li> <li>Ashburton District has a high density of alcohol licences. In 2016, the density of licensed premises in the Ashburton District per population (37.9 per 10,000 adults aged over 15) was slightly higher than Christchurch City (25.9) and the Selwyn District (16.2). Figure 2 shows the that the density of licences in the Ashburton District is slightly higher compared to the New Zealand average for all licence types.</li> <li>Te Mana Ora data indicate that there are 113 licensed premises operating in the Ashburton District, with 27 classed as off-licences. Figure 3 shows that more than half of licensed premises are in Ashburton, which has areas that have high levels of neighbourhood deprivation.</li> <li>Neighbourhoods with greater socioeconomic deprivation experience a stronger relationship between off-premises outlet density and harm. Adults living in the most deprived neighbourhoods are more likely to be hazardous drinkers than</li> </ul>	<p>Our data is the most recent we have available and the current number of licenced premises in the Ashburton District is 99, which accounts for 110 active licences in total. These active licences can be further broken down as follows:</p> <p>57 On-Licences 27 Off-Licences 26 Club Licences</p> <p>The above includes a total of 23 licenced premises in Methven accounting for 26 licences.</p>

Submitter name	Page	Summary	Staff comments
		<p>those in the least deprived neighbourhoods. There is also a positive association between the proximity to alcohol outlets and crime.</p> <ul style="list-style-type: none"> <li>• According to Statistical Area 2 (SA2) deprivation scores from the New Zealand Index of Deprivation 2018, four data zones of urban Ashburton have deprivation scores of 7 and 8, indicating high levels of socioeconomic deprivation. Additionally, the Index of Multiple Deprivation (IMD) places six data zones in the district, including Ashburton Central, in the most deprived 20% of all neighbourhoods in Aotearoa for crime.</li> <li>• Methven is another area in the Ashburton District which has a significantly high density of alcohol licences. In 2018, the population of Methven aged 15 and over was 1,429 residents. With 26 licences, Methven has a density of around 182 alcohol licences per 10,000 adult population aged 15 and over. We that the Methven population increases significantly over winter due to an influx of visitors. However, an increase of five times the usual resident population (i.e., more than 5,700 visitors at one point in time) is required for the alcohol licence density in Methven to equate to the average density across the Ashburton District (37.9 per 10,000 adults aged 15 and over).</li> </ul>	
BRAIDED RIVERS COMMUNITY TRUST (REID, Robert)	34	<ul style="list-style-type: none"> <li>• The proliferation of bottlestores and off-licenses in our district needs to be considered. The number of stores visibly selling off-license product has been growing and we don't believe this does anything to benefit our community and residents within it. We don't need to look far to see parts of the country with a bottlestore on every corner, this is not desirable in any form. Consideration needs to be given to what steps can be taken to cap the number of licenses issued.</li> </ul>	There are currently 27 premises with an Off-Licence in the Ashburton district
ALCOHOL HEALTHWATCH (WILLIAMS, Rebecca)	3	<ul style="list-style-type: none"> <li>• Section 77(1)(d) of the Act enables TAs to consider whether further licences should be issued for licensed premises, or whether there should be a cap/maximum limit or sinking lid policy to halt or reduce the existing numbers of outlets, particularly in areas where licensed premises have reached saturation levels. Many TAs have utilised this section of the Act to institute caps on numbers, or impose a rebuttable presumption against the issuing of new licences in certain areas or a sinking lid to an acceptable number of licences in an area.</li> </ul>	Section 77 (1) of the Sale and Supply of alcohol Act 2012 sets out a number of policies (a) to (g) which TAs <b>may</b> include in a Local Alcohol Policy, including having a policy on “whether further licences (or licences of a particular kind) should be issued for premises in the district concerned, or any part of the district”.



Submitter name	Page	Summary	Staff comments
<b>One-way-door policy</b>			
BRAIDED RIVERS COMMUNITY TRUST (REID, Robert)	34	<ul style="list-style-type: none"> <li>Section 2.2.2. allows for one way door restrictions in part of the district but not others. We don't see any good reason for treating two parts of the district differently. A fair and level playing field for all operators is important.</li> </ul>	
ALCOHOL HEALTHWATCH (WILLIAMS, Rebecca)	3	<ul style="list-style-type: none"> <li>We support the inclusion of a one-way door restriction for on-licences, and the fact this is a mandatory restriction for the urban area of Ashburton (as per the map).</li> </ul>	
ASHBURTON CITIZENS ASSOCIATION (FAVEL, Donna)	30	<ul style="list-style-type: none"> <li>Ashburton Citizens Association do not request any changes to the current policy. However, are curious to better understand why the differential in <b>One Way Door Restriction</b> between <b>Ashburton Urban</b> area and <b>All other areas of the District</b></li> </ul>	
<b>Density / Sensitive Sites</b>			
TRAIL, Alexandra	87	<ul style="list-style-type: none"> <li>There is an alcohol shop across a primary school and close to the High school. Those areas should be restricted for selling alcohol.</li> </ul>	
TE WHATU ORA (BARRY, Vince)	79	<ul style="list-style-type: none"> <li>Te Mana Ora recommends that the LAP adopts proximity controls that specify a required distance between new licensed premises and 'sensitive sites'. Sensitive sites should include, but may not be limited to schools, churches, marae, and alcohol treatment centres.</li> <li>As discussed above, there is a positive association between alcohol outlet proximity and alcohol harm. Adopting proximity controls surrounding sensitive sites will help to reduce exposure to advertising and accessibility of alcohol to vulnerable population groups that frequent these sites. For example, hazardous drinking among past-year drinkers in the Canterbury region is most prevalent among young adults aged 15 to 24 (1 in 3). Therefore, restricting licensed premises surrounding schools would have positive outcomes for youth who are disproportionately affected by hazardous drinking.</li> </ul>	Introducing proximity controls into the policy is a decision for Council. If requested, officers would need to work through the implications, and bring a revised policy back to Council for further consultation.
ALCOHOL HEALTHWATCH (WILLIAMS, Rebecca)	3	<ul style="list-style-type: none"> <li>There is a body of national and international evidence that demonstrates the relationship between density and a range of alcohol-related harms. We suggest that, as other TAs have done, a policy be included on the location of licensed premises and proximity to other licensed premises, as this can address the harm arising from the clustering of premises. The policy could also include a specified distance/radius from any existing licensed premises.</li> </ul>	

Submitter name	Page	Summary	Staff comments
		<ul style="list-style-type: none"> <li>Most LAPs include a policy on location and proximity to certain “sensitive facilities”, particularly educational facilities, addiction and treatment facilities, places of worship, community facilities (e.g. parks and reserves) or similar sites. We recommend that the Council likewise include a similar provision, and also include a specified distance/radius from any existing licensed premises.</li> </ul>	
<b>Opening hours (off- licences)</b>			
BRAIDED RIVERS COMMUNITY TRUST (REID, Robert)	34	<ul style="list-style-type: none"> <li>Particularly in relation to Off-Licences we believe in keeping the same rules for all. While at this time there don’t appear to be any submissions suggesting a change we want to be clear in our support for keeping clear and consistent rules and opening hours for all off-license holders.</li> </ul>	
TE WHATU ORA (BARRY, Vince)	79	<ul style="list-style-type: none"> <li>Te Mana Ora commends that the maximum trading hours for off-licence premises in the current LAP (3.1.1) is less than the maximum trading hours set out in the Sale and Supply of Alcohol Act 2012 (the Act). However, Te Mana Ora recommends that the maximum trading hours for off-licence premises is further reduced by delaying the opening time to 8:00 or 9:00 am.</li> </ul>	
ALCOHOL HEALTHWATCH (WILLIAMS, Rebecca)	3	<ul style="list-style-type: none"> <li>Off-licences: We note that the Council has applied the Act’s default opening hours (7am), and understand that the original proposal in the 2013 draft was for 9am but this was “considered unreasonable because of the inconsistency with the maximum opening hours for on-licences (7am).” As noted above, we recommend a later opening hour for on-licences, and do not believe that linking opening hours of on and off-licences is sufficient reason to have a 7am provision for off-licences as well. We hope the Council would consider a later opening time for both on and off-licences. We support the 9:30pm district-wide closing time for all types of off-licences and recommend a 9am opening time for off-licences as originally proposed.</li> </ul>	
<b>Opening hours (on-licences)</b>			
Anonymous 4	13	<ul style="list-style-type: none"> <li>Fewer controls. Print room should stay open till 3 like the bars in Christchurch</li> </ul>	
DONNELLY, Camille	44	<ul style="list-style-type: none"> <li>Fewer controls, where the local hotels can host patrons longer.</li> </ul>	
Anonymous 8	18	<ul style="list-style-type: none"> <li>Think about the closing time of pubs etc. change it!</li> </ul>	
ROBERTS, Charlotte	73	<ul style="list-style-type: none"> <li>I would like to see pubs be able to stay open until 2am like it was before</li> </ul>	

Submitter name	Page	Summary	Staff comments
Jane	58	<ul style="list-style-type: none"> <li>Fewer controls for established businesses to trade for longer hours and give them the right to choose.</li> </ul>	
METHVEN COMMUNITY BOARD (HOLMES, Kelvin)	68	<ul style="list-style-type: none"> <li>The policy presently states that footpath areas cannot be used after 12am and yet a tavern or hotel have the maximum trading hours 7am to 2am the following day. It would seem that the hour should be extended to 1am Monday to Sunday. Local businesses suffer the problem of getting people inside their premises by midnight as an example.</li> <li>There seems to be some conflict with the Alfresco Dining policy in the administration of the outdoor areas and the Licences to Occupy council footpaths.</li> </ul>	<p>The Use of the Footpath for Alfresco dining policy does not refer to trading hours.</p> <p>The Local Alcohol Policy states the maximum trading hours of footpath areas, being 7.00 am – 12.00am (midnight).</p>
TE WHATU ORA (BARRY, Vince)	79	<ul style="list-style-type: none"> <li>Te Mana Ora recommends further reducing trading hours for both off-licensed and on-licensed premises. Extended trading hours increases alcohol consumption and can create and sustain hazardous drinking behaviours. Evidence supports reducing trading hours as an effective policy measure for reducing the availability of alcohol and alcohol harm.</li> <li>Te Mana Ora does not support the opening times of 7:00 am for on-licensed premises. We recommend changing the maximum trading hours for all on-licensed premises (including hotel bars) by moving the start time for supplying alcohol from 7:00 am to 8:00 or 9:00 am. A start time of 8:00 am would bring the LAP in line with default maximum trading hours for on-licences set out in the Act. The most common start time of alcohol trading for on-licensed premises in LAPs across Aotearoa is 8:00 am, with several at 9:00 am or later.</li> </ul>	
ALCOHOL HEALTHWATCH (WILLIAMS, Rebecca)	3	<ul style="list-style-type: none"> <li>On-licences: The opening hours (7am) set out in the LAP are earlier than the default trading hours in the Act (8am). We do not understand the reasoning behind this, but are aware that the majority of other Council LAPs have an opening time of 8am (e.g. Hurunui, Kaikoura District Councils) or even later (e.g. Gisborne LAP's opening time of 10am).</li> <li>Club licences: in particular those held by sports clubs, have been shown in research to contribute to the risky drinking behaviours among participants at the club. Given the level of harm associated with clubs, we recommend that consideration be given to mandatory opening and closing hours of club licences.</li> <li>Special licences: we recommend that the LAP contains adequate guidance for the DLC or applicants for special licences. We recommend that the LAP contain</li> </ul>	

Submitter name	Page	Summary	Staff comments
		provisions to restrict trading hours for special licences, at the very least to the hours permitted in the on-licence or with a maximum closing time.	
<b>Methven (specific reference)</b>			
Anonymous 7	<b>16</b>	<ul style="list-style-type: none"> <li>Extending hours to which you can serve alcohol. A lot of Methven pubs have sidewalk access which they have to close by 1130-1200</li> </ul>	<p>The Local Alcohol Policy currently states the following trading hours for on-licences:</p> <p><b>- taverns (bars, pubs and nightclubs):</b> Monday – Sunday 7.00am – 2.00am the following day</p> <p><b>- restaurants or café:</b> 7.00am – 1.00am the following day</p> <p><b>- footpath areas (tavern, restaurant or café):</b> 7.00am – 12.00am (midnight)</p> <p>This allows pubs in Methven to stay open till 2.00am.</p> <p>The current on-licence for The Blue Pub allows them to stay open till 2:00am, with a one-way-door policy at 1:00am. The footpath area is the only area that needs to close at 12:00am (midnight). If they close the indoor area earlier, this is by their own choice.</p>
HOLLAND, Genevieve	<b>56</b>	<ul style="list-style-type: none"> <li>Establishments staying open later deter noise nuisance and house parties. Changes or reviews of security and bar staff removing intoxicated patrons could be improved - some establishments like the Blue Pub in Methven control this extremely well.</li> </ul>	See above
Faye	<b>50</b>	<ul style="list-style-type: none"> <li>For the Blue or Brown pub to be granted a license until 1am, 1hr longer than what is currently allocated.</li> </ul>	See above

Submitter name	Page	Summary	Staff comments
Filip	52	<ul style="list-style-type: none"> <li>I would like to see pups which are controlled to be able to stay longer open</li> </ul>	See above
Anonymous 9	20	<ul style="list-style-type: none"> <li>At least close at 1! So many places elsewhere close so much later</li> </ul>	See above
Maddy	62	<ul style="list-style-type: none"> <li>The pub being a loud to stay open till 3am like it always use to. There was far less problems then.</li> </ul>	See above
McCulloch, Jane	64	<ul style="list-style-type: none"> <li>Alter the policies to enable the pubs to do what they do best - provide a controlled environment for patrons to visit without kicking them out before midnight!</li> </ul>	See above
Sam	75	<ul style="list-style-type: none"> <li>Pushing the closing time of the pubs back to 1am. People are safer drinking in controlled environments.</li> </ul>	See above
Anonymous 12	24	<ul style="list-style-type: none"> <li>let the pubs open longer and have responsibility for themselves</li> </ul>	See above
JOHNSTONE, Rebekah	60	<ul style="list-style-type: none"> <li>I am a resident in Methven. When the pubs have to close early before 12 we start having neighbourhood issues, home parties, bottles being thrown, noise control issues. There are plenty of examples of this on the Methven notice board. With limited police available and noise control having to drive from Ashburton this makes for an unsafe neighbourhood. By allowing the bars to operate to 2am with their security staff host responsibility training etc it allows for people to have fun in a safe environment. Methven is seen as a tourism spot and people enjoy going out for a drink sometimes that is later than 11pm! The advantages of this therefore allow a positive economic benefit as well.</li> </ul>	See above
ROBERTS, Charlotte	73	<ul style="list-style-type: none"> <li>It is sad the council is making running businesses so hard for everyone. What is wrong with people having fun in a controlled environment and adding to the areas economy by spending at these establishments? Young people want to have fun and having a good night out is not harming anyone. If people are going to drink and drive they will do it when the pub closes no matter what time that may be and it has not been stopped by shutting early. If anything it has made the issue of pre drinking to be drunk for the short hours at the pub worse, then encouraging young people to drive to find something to do when the pub boots them out early. I wish we could still have fun out with our mates like we once could.</li> </ul>	See above

Maddy	62	<ul style="list-style-type: none"> <li>I would like to know why these rules have been brought in as it has only made it worse.</li> </ul>	See above
<b>Discretionary Conditions</b>			
TE WHATU ORA (BARRY, Vince)	79	<ul style="list-style-type: none"> <li>Te Mana Ora recommends that the first discretionary condition under Section 6.2.3 (Restriction on the number of drinks that can be ordered after a specified time, and time of last orders) is amended by removing “after a specified time” to read “Restriction on the number of drinks that can be ordered and time of last orders”.</li> <li>Te Mana Ora also suggests that Council consider adding a discretionary condition under Section 6.2 of the LAP that restricts the size or alcohol percentage of the drinks, such as prohibiting the sale of wine by the bottle at special licensed events. This would minimise risks of intoxication or patrons sharing drinks with someone who is already intoxicated.</li> <li>Te Mana Ora suggests that Council consider adding a discretionary condition under Section 3.2 of the LAP that prohibits the use of ‘buy now, pay later’ (BNPL) services at off-licences. BNPL services increase the economic accessibility of alcohol and may lead to increased alcohol use and harm, as well as financial hardship for vulnerable populations.</li> </ul>	For discussion - The suggestions are a possibility but the benefits are uncertain.
CLUBS NEW ZEALAND (GRAHAM, Larry)	41	<ul style="list-style-type: none"> <li>With regard to discretionary conditions it is acknowledged that the Act allows for wide-ranging discretions as to the conditions that may be applied to a licence, however, we would like to see policies provide more guidance and direction on when these types of discretionary conditions may be imposed.</li> <li>Clubs New Zealand would expect these types of discretionary conditions would only be imposed if there is evidence to suggest the conditions are required or that they will substantially contribute to the purposes of the LAP and the Act.</li> <li>Clubs New Zealand has found that in other districts discretionary conditions are applied on a blanket basis and we do not believe that this approach is consistent with the intents of the Act.</li> </ul>	<p>Each licence application is considered on its own merits and any discretionary conditions, which are not inconsistent with the Act, are applied accordingly.</p> <p>Discretionary conditions are not applied on a blanket basis.</p>
ALCOHOL HEALTHWATCH (WILLIAMS, Rebecca)	3	<ul style="list-style-type: none"> <li>We support the examples of discretionary conditions that may be applied to an on-licence, including a one-way door policy, and crime prevention (CPTED) conditions (CCTV, security, lighting etc).</li> </ul>	

	<ul style="list-style-type: none"><li>• We encourage the Council to add a discretionary condition on off-licence premises external advertising that would address disproportionate direct advertising and associated pricing of alcohol products outside/on these premises. The DLC should explicitly have the discretion to fully restrict alcohol brand, product and price signage and at the very least to no more than 25% of main façade (refer for example, Auckland DLC Practice Note, 13 March 2023ii and also the principles of CPTED).</li><li>• We recommend additional discretionary conditions such as those prohibiting the use of Buy Now Pay Later (BNPL) payment schemes for the purchase of alcohol. The availability of alcohol products on BNPL platforms may enable alcohol purchases and/or trigger the desire to purchase alcohol (and purchase more alcohol than planned) at a perceived lower price.</li></ul>	
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## 4. Any other Comments

Submitter name	Page	Summary	Staff comments
<b>Other</b>			
TRAIL, Alexandra	<b>87</b>	<ul style="list-style-type: none"> <li>Energy drinks should be restricted for under 20's. They have bad influence on kids behaviour. A very disrespectful young generation is sadly raising up, we still have time to stop that.</li> </ul>	
RISK, Roberta	<b>71</b>	<ul style="list-style-type: none"> <li>No alcohol at Rugby games. Stop serving alcohol to spectators and players, especially at children's rugby.</li> </ul>	
BROWN, Philip	<b>37</b>	<ul style="list-style-type: none"> <li>The laws need to be changed so that the public can have a say and not be put down because of the legal wording on how one can make a submission.</li> </ul>	
Faye	<b>50</b>	<ul style="list-style-type: none"> <li>I think as a community we need to consider all needs across all age groups. Also all businesses in the district that are in hospitality and rely on trade from locals, visitors and tourists. People should be able to go out, have a good time and stay out late. Other controlled measures can be put in place for keeping people safe with alcohol, such as security, breathalyser entry, larger range of late night bar food or maybe free bar snacks like peanuts etc</li> </ul>	
Filip	<b>52</b>	<ul style="list-style-type: none"> <li>I feel like current restrictions are getting too bureaucratic for businesses</li> </ul>	
TE WHATU ORA (BARRY, Vince)	<b>79</b>	<ul style="list-style-type: none"> <li>Alcohol is the most harmful drug in Aotearoa New Zealand. Its consumption continues to cause significant harms to people, whānau and communities and is a key driver of health and social inequities in Aotearoa.</li> <li>Alcohol-related harm can be broadly defined as both direct and indirect harm to an individual, society or the community caused by the excessive or inappropriate consumption of alcohol and has many health, social and justice consequences.</li> <li>Alcohol is now much more widely available and accessible than in the past. Just under 20% of people in Canterbury over the age of 15 years report drinking at a level that is hazardous to their health. This equates to more than 100,000 people in our region who are considered hazardous drinkers. The more alcohol</li> </ul>	



	<p>that is consumed, the risk of alcohol-related diseases and injuries becomes higher, which result in preventable costs to the health, social development, and justice systems in addition to the personal costs to individuals, families and communities.</p> <ul style="list-style-type: none"> <li>• Alcohol use is not equitable among Canterbury residents. Hazardous drinking and heavy episodic drinking are most prevalent among those aged 15 to 24 years, men, Māori, Pacific and those living in more deprived neighbourhoods.</li> <li>• There is evidence of alcohol harm and hazardous drinking occurring within the Canterbury region, and the situation is likely to be similar in the Ashburton District. Additionally, national evidence indicates that those living within rural areas are less likely to consume alcohol within recommended limits.</li> <li>• People living in rural areas are more likely to have consumed alcohol in the last week, less likely to drink within the recommended daily and weekly limits and less likely to follow low-risk drinking advice than people living in urban (non-rural) areas.</li> <li>• Alcohol is the leading preventable cause of early death, disability, and social harm. Our health system incurs significant costs due to alcohol-related harm. In 2011, alcohol-related harm was estimated to cost the Canterbury health system \$62.8 million per year.</li> <li>• Over the period from 2016 to 2018, the rate of hospitalisations in the Ashburton District that were wholly attributable to alcohol was 92.1 per 100,000 population aged 15 years and over. This was higher than rates in Timaru (77.7 per 100,000), Christchurch (76.3 per 100,000), Waimakariri (36.9 per 100,000) and Selwyn (31.7 per 100,000). It should be noted that these numbers do not capture admissions for other medical conditions related to alcohol use such as cancers.</li> <li>• Adopting healthy public policies and reducing the availability of alcohol are important ways to reduce levels of alcohol use and alcohol-related harm, with an extensive national and international evidence-base for their efficacy.</li> <li>• Te Mana Ora has a long history of working collaboratively to deliver alcohol licensing functions across the Canterbury region, however our involvement in alcohol licensing in the Ashburton District is relatively recent. Strengthening the current LAP will support our recent collaborative efforts to reduce alcohol harm.</li> <li>• Whilst LAPs and Alcohol Control Bylaws are both work to minimise alcohol harm, there are key differences in their functions. An Alcohol Control Bylaw sets</li> </ul>	
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Submitter name	Page	Summary	Staff comments
		<p>out where drinking alcohol in a public area is not allowed. Te Mana Ora commends Council for the recent review and expansion of areas covered by the Alcohol Control Bylaw 2017. A LAP, on the other hand, supports communities to have a say on the sale of alcohol and licensing decisions in their neighbourhoods. Having a strong LAP working in conjunction with Alcohol Control Bylaws is essential for reducing alcohol harm.</p>	
SUPER LIQUOR HOLDINGS (HOAR, Greg)	77	<ul style="list-style-type: none"> <li>We request that if there are changes made to the current LAP, that whatever is proposed (eg Trading hours, restriction of product, discretionary conditions etc) should apply to all premises that hold an off-licence (including bottle stores, supermarkets, grocery stores and off-licences held by clubs), to ensure a level playing field.</li> </ul>	
NZ POLICE (ROBERTSON, D)	69	<ul style="list-style-type: none"> <li>NZ Police support the renewal of the current LAP without change - unless the Council leaders have identified aspects that require it.</li> </ul>	
ASHBURTON CITIZENS ASSOCIATION (FAVEL, Donna)	30	<ul style="list-style-type: none"> <li>Regarding the Consultation Document, Page 6 – Option Two – Disadvantages – “Making changes to the policy will require further public consultation, which could cause delays and be costly for ratepayers” – is not a statement that encourages submitters to provide open and honest responses. In fact, while Ashburton District Council have been very clear in their choice of words, an inexperienced or cautious submitter, may interpret this as “Don’t submit anything that may result in changes as your submission will initiate further public consultation, which will cause delays and be costly for ratepayers”. If Ashburton District Council consultation primary goal, is for the best fit Local Alcohol Policy – should process and cost of consultation even be a consideration of the submitter?</li> <li>Is it appropriate that Ashburton District Council refer to the Costs relating to reviewing aspects of Alcohol Policy, without acknowledging that of all drugs in NZ society, alcohol causes the most harm and for New Zealanders aged between 18-45 years it is the leading risk factor causing death. Alcohol is one of the main risk factors for diseases such as cancer and mental health conditions as well as social problems such as domestic violence and road deaths.</li> <li>Enforcement – during the Alcohol Control Bylaw review, NZ Police stated they predominantly enforce upon request – is there a better / more proactive model that could be adopted?</li> </ul>	<p>This statement was to make clear to anyone submitting the future process for the policy if any further changes were made to beyond this consultation process”</p>

Submitter name	Page	Summary	Staff comments
<b>Licensing</b>			
NZSKI (MCKENZIE, James)	66	<ul style="list-style-type: none"> <li>My concern is that licensing decisions are subjective as opposed to objective, steered by the personal opinions and agendas of a few key decision makers and made behind closed doors. A more data-driven, consultative process would ensure licensees have greater visibility of the decision-making process and give them the opportunity to challenge the premise and arguments upon which decisions are being made. Adopting a model with a defined set of criteria and weighting/scoring would improve the optics of the decision-making process.</li> </ul>	These decisions are made by the DLC and Council has no control over these decisions.
EASON, Ed	46	<ul style="list-style-type: none"> <li>Please be more rigorous in granting liquor licenses, according to your own bylaws, as the liquor store at Allenton, is a perfect example, being too close to a school, and for that matter a church, to quote the bylaw.</li> </ul>	
METHVEN COMMUNITY BOARD (HOLMES, Kelvin)	68	<ul style="list-style-type: none"> <li>At the bottom of sections 2,3, 4 and 6 the wording states "that further discretionary conditions may be considered by the DLC..... a, b &amp; c. Anecdotally, the DLC has a history of being quite stringent in their deliberations and the licencing inspectors the same. It is remembered that the District Licensing Committee role is to represent the community and also the provisions of the Sale and Supply of Alcohol Act 2012.</li> <li>The Board feels that the discretionary process needs to be more transparent in meaning and more consultative in their approach with Licence holders. After all, the licence holders are the ones taking the business risk and have to manage the conditions of the licences. A better line of communication between holders and the DLC would ensure a better relationship for the future.</li> </ul>	
CLUBS NEW ZEALAND (GRAHAM, Larry)	41	<ul style="list-style-type: none"> <li>Clubs New Zealand is supportive of retaining the current policy wording for the maximum trading hours for Club Licences. We do note however, that the discussion document quotes the off-licence trading hours under section 4.1.1. and this should be corrected.</li> </ul>	<p>In the consultation document at 4.1.1. accidentally the <i>Off licence</i> table has been copied in the <i>Club License</i> section. The current policy, which is available on our website, correctly states 'club-licence' at 4.1.1.</p> <p><i>Strategy &amp; Policy Team</i></p>

Submitter name	Page	Summary	Staff comments
CLUBS NEW ZEALAND (GRAHAM, Larry)	41	<ul style="list-style-type: none"> <li>It is assumed that section 5 of the policy relates to the holder of a permanent charter. Clubs New Zealand recommends that this policy should be amended to: <i>Controls for chartered clubs will be the same as the controls for club-licences and/or off-licences, detailed in sections 4 and 3 of this policy.</i></li> </ul> <p>We believe this would better align the policy with Section 414 of the Sale and Supply of Alcohol Act 2012, additionally a club cannot hold an on-licence by virtue of Section 29 and therefore it does not make sense to apply on-licence conditions to a club.</p>	