

Local Alcohol Policy

Research Report

November 2024

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1 Purpose, scope, and methodology

1.1 Purpose

To research and analyse whether it would be appropriate for the Council to develop a Local Alcohol Policy (LAP).

1.2 Research objectives

Research objectives are to understand:

- the legislative context for developing a LAP
- the characteristics of residents and visitors to the district
- alcohol sales, supply and consumption in the Far North
- the benefits and harms associated with alcohol
- how a LAP might ensure the sale, supply and consumption of alcohol occurs safely and responsibly while minimising alcohol-related harm.

1.3 Scope of the research

This research:

- provides background information regarding:
 - how the Sale and Supply of Alcohol Act 2012 (the Act) applies to developing a LAP
 - roles and responsibilities of various agencies including the Council regarding the sale, supply, and consumption of alcohol in the district
- describes the demographics of residents
- analyses health indicators for the resident population
- describes the alcohol industry in the district
- investigates the demographics of tourists and other visitors to the Far North
- investigates patterns of alcohol consumption nationally and in the region
- describes alcohol-related harms and problems
- analyses the number, location, and opening hours of licensed premises in the district
- discusses the policy elements that could be included in a LAP
- reports on the initial views of key stakeholders regarding developing a LAP for the district.

The research does not:

- investigate the harm from drugs other than alcohol (except regarding alcohol-affected road crashes where Ministry of Transport data combines alcohol and drug use)
- address matters that are the responsibility of central government to address, such as setting the minimum purchase age for alcohol, controlling the production of alcohol, etc.
- involve formal consultation with the public – this will occur in the next stages in the policy development process, assuming Council agrees that a LAP should be developed.

The findings of this Report will feed into an Options Report for the Council. This Report will examine the pros and cons of developing a LAP and will recommend to the Council whether to develop a draft LAP or not.

1.4 Methodology

The following methods were used to conduct the research:

- interviews, discussion, and workshops with subject matter experts including:
 - the Council's Alcohol Inspectors
 - the NZ Police
 - the Medical Officer of Health, Ngā Tai Ora - Public Health Northland
 - Health NZ | Te Whatu Ora
 - Whangārei District Council
 - Kaipara District Council
 - Northland Inc.
 - Alcohol Healthwatch
 - Maritime NZ
 - Water Safety NZ
 - Whiria Te Muka
 - Hospitality NZ
 - Restaurant Association of New Zealand
 - Retail NZ

- Northland Winegrowers
- desk research and analysis of secondary data
- analysis of custom data for the district provided by:
 - NZ Police
 - Ministry of Transport
 - Ministry of Health | Manatū Hauora.

Where possible, information is provided for the district. Where this is not available, regional or national information is provided. Most data in the report is from 2017 onward; for example, two key information sources are:

- regional (Northland) results from the New Zealand Health Survey from 2017 to 2020
- detailed results for the district from the 2018 Census (only high-level results from the 2023 Census were available at the time of preparing this report).

2 Context

2.1.1 Alcohol in New Zealand – ‘no ordinary commodity’¹

Alcohol significantly impacts New Zealanders' lives, both positively and negatively. Three-quarters of New Zealanders aged 15 or more (76% or 3.2 million people) consumed at least one drink in the past 12 months in the year ending July 2023².

Positively, responsible alcohol consumption can enhance social gatherings, foster community bonds, and enable people to relax and enjoy ‘time-out’. The alcohol industry also boosts the economy by supporting employment and sponsoring various cultural and sporting events in New Zealand. In 2020, retail sales of alcohol were \$3.61 billion³.

However, excessive and inappropriate alcohol consumption is linked to numerous harms, including physical health problems, mental health issues, and social problems such as family dysfunction and domestic violence. Excessive alcohol consumption also contributes to violence, crime, road crashes, and domestic accidents.

The economic impact of these harms is significant, including costs related to healthcare, accident compensation, and law enforcement. A report commissioned by the Ministry of Health estimated the annual cost of alcohol-related harm for the country was \$9.1 billion⁴ in 2023, with over half (\$4.8 billion) associated with foetal alcohol spectrum disorder (FASD).

As noted by Babor et al⁵, alcohol is widely available from many outlets, and sales of alcohol are normalised as a commodity like bread or milk. However, given the harms associated with its unsafe consumption, alcohol is ‘no ordinary commodity’.

2.1.2 Making a LAP for the District

Under the Act, Council may make a LAP for the district, or parts of the district, stating Council’s expectations regarding licencing the responsible sale and supply of alcohol while minimising alcohol-related harm.

2.1.3 Previous LAP development

From 2013 to 2015, Council developed a Provisional LAP. At this time the Provisional LAP could be appealed before the Alcohol Regulatory and Licencing Authority (ARLA) and appeals were lodged by:

- the alcohol industry (who felt the Provisional LAP went too far)
- an individual (the Provisional LAP did not go far enough).

In 2018, due to the large legal costs of defending its position, Council decided to cease developing this LAP.

Under the Act, Council cannot recommence developing the previous Provisional LAP, as consultation with the public on its content occurred more than six years ago, in 2014.

2.1.4 Woolworths and Foodstuffs North Island v. Auckland Council 2023

A Provisional LAP developed by Auckland Council from 2010 to 2015 was also challenged by the alcohol industry, and after several appeals, the case (Woolworths and Foodstuffs North Island v. Auckland Council) was heard by the Supreme Court in 2023. The Supreme Court ruled in favour of Auckland Council and refuted arguments made by the alcohol industry against this Provisional LAP. In its judgement the Supreme Court provided guidance to making a LAP, for example:

- LAPs can legitimately be based on community preferences – they do not need to be “evidence based”

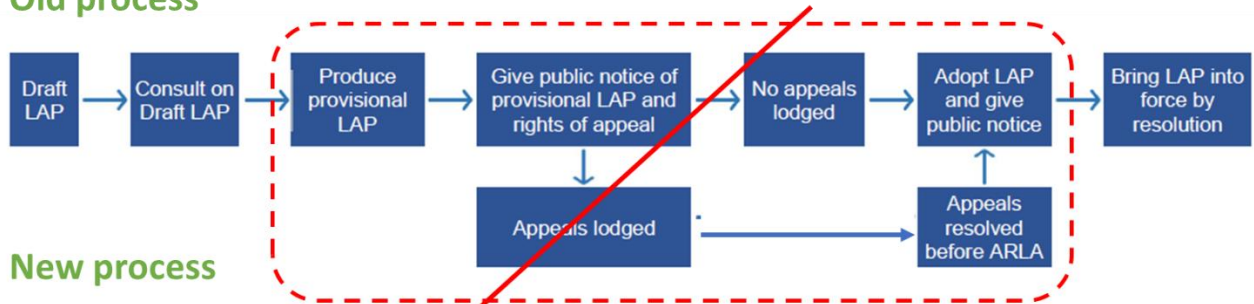
- a restriction in a LAP may be justified if there is a reasonable likelihood that it will reduce alcohol-related harm
- a local council can take a precautionary approach. If it appears likely a LAP element will reduce alcohol-related harm in its district, “proof” is not required
- the default trading hours for licensed premises stated in the Act can be amended by a LAP to reflect community preference
- when evaluating the nature and extent of the elements in a LAP, an assessment of two factors is required:
 - 1) the reduction in alcohol-related harm likely to result if the element is in place
 - 2) the likely disruption to a) safe and responsible drinking, and b) to those who sell alcohol in a safe and responsible way.

2.1.5 Changes to the Act in 2023

In 2023, the Act was amended to make it easier for a local authority to make a LAP, with the need to make a Provisional LAP and the appeals process against this Provisional LAP removed. See the following diagram:

Figure 1: Changes to the LAP development process under the amended Act

Old process



New process



When the Act was amended in 2023, measures were also introduced to make it easier for local communities to provide input into a LAP and to influence District Licensing Committee (DLC) decisions, for example:

- allowing “any person” to object to a licence application, rather than just those with a “greater interest” than the general public
- extending the time to make an objection from 15 to 25 days after the public notice of a licence application
- parties can attend hearings remotely
- cross-examination is not allowed (the DLC will test the evidence)
- tikanga may be incorporated into proceedings and evidence may be presented in te reo Māori.

Section 133 of the Act now makes it clear that a LAP applies when renewing a licence – conditions may be imposed to ensure the renewed licence is consistent with the LAP, and renewal may be declined if the licence is inconsistent with the LAP.

3 Problem definition

If the Council decides to develop a LAP, the Act requires the Council to have regard to the nature and severity of alcohol-related problems arising in the district.

These problems relate to the harms associated with the inappropriate and excessive consumption of alcohol, such as:

- physical health problems
- mental health issues
- social problems including family/whanau dysfunction and domestic violence
- abusive behaviour, violence, and public disorder
- criminal offences including drink-driving incidents
- road crashes
- domestic accidents
- financial impact on households

- economic impacts, including costs related to healthcare, accident compensation, and law enforcement
- problems and issues specific to licensed premises.

Excessive or inappropriate consumption of alcohol is discussed in section 8.2, while the problems and harms associated with this consumption are discussed in section 9.

4 Roles and responsibilities in relation to alcohol-related harm

4.1 Council's roles and responsibilities under the Local Government Act 2002

Promotion of the Four Wellbeings

Under section 10 of the Local Government Act 2002, the purpose of local government is to “promote the social, economic, environmental, and cultural wellbeing of communities, in the present and for the future”. The table below gives examples of how a LAP could potentially help promote these wellbeings by minimising alcohol-related harm in the district:

Table 1: How a LAP could promote the four community wellbeings

Types of community well-being	Examples of how a LAP could promote these wellbeings
Social	<p>Regulating the location of licensed premises can prevent the clustering of alcohol outlets in certain areas, to help prevent alcohol-related crime and disorderly behaviour concentrating in these areas.</p> <p>Limiting the proximity of licensed premises to sensitive facilities like schools, community centres, and healthcare facilities can reduce the exposure of minors, at-risk individuals, and family groups to alcohol outlets.</p> <p>Setting appropriate trading hours can reduce the availability of alcohol during times when risks of excessive consumption and associated harms are heightened, while ensuring alcohol is available at more appropriate times.</p> <p>One-way door restrictions can potentially reduce the risk of intoxication, violence, and disorderly behaviour during late-night hours.</p>
Economic	A LAP may contribute to economic vitality by preventing oversaturation of outlets in certain areas and ensuring current premises can trade profitably.
Environmental	Regulating the concentration of licensed premises and/or putting in place licencing conditions may help mitigate environmental impacts such as noise pollution and littering.
Cultural	A LAP may help protect important cultural places such as schools and marae from the negative effects of proximity to alcohol outlets.

NB. Central government has announced that it may amend the Local Government Act, including the purpose of local government. If this occurs, staff will review all policies and make recommendations to Council to amend accordingly. Central Government has indicated it will provide further information by the end of 2024. Currently there is no Bill before parliament and Council must continue to adhere to existing legislation.

Principles relating to local authorities

Section 14(c) of the Local Government Act 2002 states that Council's decisions should take into account:

- the diversity of the community, and the community's interests within its district
- the interests of future as well as current communities.

4.2 Roles relating to Te Tiriti o Waitangi

There is no specific reference to Te Tiriti in the Sale and Supply of Alcohol Act 2012. However, the changes to the Act in 2023 include amendments to encourage a greater Māori voice in DLC decisions.

In addition, the Local Government Act 2002 includes requirements for local authorities to take appropriate account of the principles of Te Tiriti. For instance, section 14 (d) states that Council should provide opportunities for Māori to contribute to its decision-making processes. This is particularly relevant given the disproportionate level of alcohol-related harm experienced by Māori in the district (see section 9.2.4).

4.3 Roles under the Sale and Supply of Alcohol Act 2012

4.3.1 Object of the Act

The object of the Act stated in section 4(1) is to ensure:

- a) the sale, supply, and consumption of alcohol is undertaken safely and responsibly; and

- b) the harm caused by the excessive or inappropriate consumption of alcohol is minimised.

4.3.2 Council must implement the Act

Council must implement the Act alongside the Police and the Medical Officer of Health. Implementation by the Council is through:

1. The District Licencing Committee (DLC)

The DLC is a part of Council but is an independent and impartial body, and decisions of the DLC cannot be overturned by the Council. Anyone wanting to sell and supply alcohol to the public in the Far North must apply to the DLC for a licence. Under section 187 of the Act, the DLC considers and decides all applications for licences. If Council adopts a LAP, under sections 105 and 131 the DLC must 'have regard to' the LAP in its decisions to grant new licences or renew existing licences. 'Have regard to' means the Council must consider the LAP provisions in its decisions, but applying these provisions in DLC decisions is not mandatory.

2. Alcohol Licencing Inspectors

Under section 197 of the Act, Alcohol Licencing Inspectors are appointed by the Council. These Inspectors are required to act independently. Their functions include:

- a. providing information for the development of a LAP
- b. inquiring into and reporting on all licencing applications
- c. appearing at DLC and ARLA hearings
- d. monitoring licencees' compliance with the Act and taking enforcement action if necessary
- e. working together with the Police and the Medical Officer of Health to monitor licences, enforce licence conditions, and develop and implement strategies to reduce alcohol-related harm.

4.3.3 Developing a LAP

It is not mandatory for a Council to develop a LAP.

If Council wishes to have a LAP, under section 78(1) of the Act, it must prepare a draft LAP, having regard to:

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

4.3.4 What can a LAP cover?

Section 77 of the Act states a LAP can only cover licencing matters and may include provisions relating to:

- a) the location of licensed premises with reference to broad areas
- b) proximity to other licensed premises or proximity to facilities of particular kind/s
- c) whether further licences of particular kind/s should be issued in the district or parts of the district
- d) maximum trading hours, which may be more or less restrictive than the national maximum default trading hours. Under the Act, the national default maximum trading hours without a LAP are:
 - o 8am to 4am on the next day for on-licences and club-licences
 - o 7am to 11pm on the same day for off-licences
- e) issuing of licences subject to discretionary conditions
- f) one-way door restrictions.

Conditions attached to special licences (e.g. licences applying to temporary events) cannot include a) and b) above.

4.3.5 A LAP must be 'reasonable'

Section 3(2a) of the Act states that the system of control over the sale and supply of alcohol introduced by the Act in 2012 must be reasonable.

The meaning of the term 'reasonable' was discussed by the Supreme Court in the case *Woolworths and Foodstuffs North Island v. Auckland Council* 2023. The Court said that a licencing restriction in a LAP may be justified if there is a reasonable likelihood that it will reduce alcohol-related harm. However, a restriction may be unreasonable if it is likely to:

- a) have limited efficacy in reducing alcohol-related harm

- b) cause significant disruption/ inconvenience to those who consume alcohol safely and responsibly and/or those who sell alcohol in a safe and responsible way.

4.3.6 Consultation

Council is required to consult with its communities, stakeholders, and the public on the draft LAP. Specifically, Council must consult with the Police, Licensing Inspectors, and the Medical Officer of Health. When consulting with the public, Council must follow the special consultative procedure described in section 83 of the Local Government Act 2002.

4.3.7 Commencing a LAP

The Act sets out a series of steps to commence a LAP involving public notices, communication with licence holders and the DLC, and allowing time for the LAP conditions to come into force before they apply.

4.3.8 Monitoring and enforcing a LAP

Council's Licensing Inspectors are responsible for monitoring compliance with the LAP, while both the Inspectors and the Police are responsible for enforcing its provisions.

4.3.9 Reviewing and amending a LAP

Council may review and amend a LAP to ensure its effectiveness in addressing local alcohol-related issues:

- if the Council decides to change or replace a LAP, it must go through the same process it took to develop the LAP
- Council must review its LAP every six years using the special consultative procedure
- if Council decides to revoke a LAP, it must also follow the special consultative procedure.

4.4 Roles relating to the Alcohol Control Bylaw 2018

When producing a draft LAP, section 78(2)(c) of the Act requires Council to have regard to any areas in which bylaws prohibiting alcohol in public places are in force.

The Alcohol Control Bylaw 2018 was made by the Council under section 147 of the Local Government Act 2002. The Bylaw allows the Council to nominate public spaces as Alcohol Control Areas where alcohol bans apply either 24x7 or for other specified times. Currently there are 23 Alcohol Control Areas in the district where alcohol-related crime and disorder has occurred in the past and Council has decided that prohibiting the consumption, bringing in, or possession of alcohol in these Areas is appropriate.

The Police enforce the Bylaw

Within the Alcohol Control Areas, Police have the power to:

- search peoples' vehicles, bags, and packages for alcohol
- seize and remove any alcohol
- ask offenders to leave an Alcohol Control Area
- issue infringement notices to offenders with a fine of \$250
- arrest those who commit offences or refuse to comply with police requests.

Enforcement is discretionary, and in general the police will only act to prevent or respond to incidents involving alcohol-related crime and disorder. Someone who is peacefully enjoying a drink in a public place will probably be ignored by the Police.

Council's roles relating to the Bylaw

Council's roles include:

- conducting research to understand the level of crime or disorder caused or made worse by alcohol consumption in the district
- by resolution, designating local areas as temporary or permanent Alcohol Control Areas
- erecting and maintaining signs to inform the public of these Areas
- educating the public about the rules applying to the Control Areas, for example through media releases, brochures and posters, and information on the Council website.

A LAP can potentially complement the Alcohol Control Bylaw

Potentially a LAP and the Alcohol Control Bylaw can work together to help minimise alcohol-related problems in an area. For example, section 147(1)(b) of the Local Government Act 2002 states that licensed premises are excluded from the Alcohol Control Areas. This means, for example, that bringing in alcohol or consuming alcohol in the carpark of a licensed premise is not covered by the Bylaw but could potentially be covered by a LAP as a

LAP deals with licensed premises. Conversely, consuming this alcohol on a public road outside the licensed premise is covered by the Alcohol Control Bylaw if this occurs in an Alcohol Control Area.

4.5 Roles and responsibilities relating to the District Plan

Requirements of the Act

Section 78(1)(a) of the Act requires Council to have regard to the objectives and policies of its District Plan when producing a draft LAP, while section 93 of the Act states that the policies in a LAP may be more restrictive than the District Plan but cannot authorise things that are forbidden by the District Plan.

Council is developing a new District Plan

The Council is reviewing its current Operational District Plan (ODP)⁶ and a new Proposed District Plan (PDP)⁷ has been made public and is going through the process of submissions, hearings and appeals to make it operative. While some provisions of the PDP already apply, it is likely that it will be 2026 or later before all elements of the PDP come into effect.

Relevant objectives and policies in the ODP and PDP

Both the ODP and PDP have many specific objectives and policies which could be relevant if Council decides to develop a LAP for the district. A list of some of these objectives and policies is included in Appendix One.

In addition, the ODP and PDP both have broad objectives and policies that are important to recognise such as:

Broad objectives

- Giving effect to the rights guaranteed to Māori by Te Tiriti O Waitangi (Treaty of Waitangi) (ODP)
- Te Tiriti o Waitangi partnerships support iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua (PDP)
- Encourage opportunities for fulfilment of the community's cultural, social, environmental, and economic wellbeing (PDP)
- A high-earning diverse local economy which is sustainable and resilient to economic downturns (PDP)
- Existing industries and enterprises are supported and continue to prosper under volatile and changing economic conditions (PDP).

Broad policies

- That the Council will have regard to relevant provisions of any whanau, hapu or iwi resource management plans, taiāpure plans or mahinga mātaihai plans (ODP)
- That amenity values of existing and newly developed areas be maintained or enhanced (ODP)
- Uphold the character and amenity of each zone by controlling the types of activities and noise levels that are permitted (PDP).

Zone-specific objectives and policies

Most objectives and policies in both the ODP and PDP relate to specific Zones, and list activities in these Zones that are permitted, controlled, discretionary, non-complying or prohibited. If a proposed activity such as a new liquor store or licensed restaurant in a particular Zone is a controlled, discretionary or non-complying activity, then a Resource Consent from the Council is required before the activity can proceed.

A LAP cannot override restrictions in the District Plan

Under the Act (section 93), a LAP may be more restrictive than the District Plan but cannot authorise things that are forbidden by the District Plan. So, for example, a LAP could say that no licensed premises can be established in the Rural Residential Zone, whereas the District Plan might say this is a discretionary activity in this Zone.

If the Council agrees that a draft LAP should be developed, the draft will be checked to ensure it complies with all relevant objectives and policies in the ODP and PDP.

4.6 Statutory Agency Roles

4.6.1 Ministry of Justice

The Ministry of Justice administers the Act and provides advice to the government on policy relating to alcohol-related offending and crime prevention.

4.6.2 The Police

Functions of the police under the Act include:

- a) providing information for the development of a LAP
- b) enquiring into all applications for licences, manager's certificates, and renewals
- c) monitoring licensed premises' compliance with the Act

- d) reporting to the DLC or ARLA where they oppose an application
- e) applying to ARLA for the variation, suspension, or cancellation of a licence
- f) advising ARLA when a licensee or manager has been convicted of any offences relating to the sale and supply of alcohol
- g) issuing infringement notices
- h) prosecuting breaches of the Act.

Police functions in relation to enforcing the Alcohol Control Bylaw are described in section 4.3 above.

4.6.3 Ministry of Health

Under the Act, the Ministry of Health through the Medical Officer of Health is responsible for:

- a) providing information for the development of a LAP
- b) enquiring into all applications for licences and renewals
- c) making reports to the DLC or ARLA where they oppose an application
- d) applying to the DLC for suspension of an on-licence or a club licence where there is evidence of non-compliance with public health requirements.

Research Findings

5 Demography of residents

5.1 Population statistics

Total resident population

In the 2023 Census, there were 71,430 people living in the Far North District. Infometrics⁸ estimate the population will increase to 78,530 people by the year 2030, with almost all this growth coming from those aged 65 and over, as the population ages.

Population growth in the district was higher than the national average over the last ten years, but is forecast to slow in the next ten years

According to Infometrics, the district's population grew by an average of 2.1% per year from 2013 to 2023, surpassing the national average growth rate of 1.6% per year. However, Infometrics forecasts a slowdown in this growth over the next decade (2023 to 2033), projecting average increases of 0.7% per year, slightly below the national projected growth rate of 0.9% per year.

A district of many small towns

The district has over 40 small towns and townships and no cities. These towns are geographically dispersed across the district. From Stats NZ population estimates⁹, the largest towns in 2023 include:

Kerikeri	8,270 residents
Kaitiāia	6,390
Kaikohe	4,980
Moerewa	2,090
Paihia	1,720
Kawakawa	1,670
Ahipara	1,450
Ōpua	1,290
Haruru	1,210

Around half of the population resides in urban settlements such as Kerikeri and Kaitiāia and the rest of the population lives in rural or semi-rural settlements.

Population density is relatively low compared with New Zealand as a whole

From the 2018 Census, the district had a population density of 9.8 residents per square kilometre, well below the national total of 18.6 residents per square kilometre.

5.2 Demography

Differences from the national population

The following table summarises how the demography of the Far North District differs from New Zealand as a whole. Differences are significant at the 95% confidence level. Charts illustrating these differences are included in Appendix Two.

Table 2: Demographic differences for the Far North District compared with the national population

Demographic variable	Compared with the national population ...	
	Far North residents are <u>less</u> likely to be in these groups	Far North residents are <u>more</u> likely to be in these groups
Age group	Aged 15 to 44	Aged 0 to 14 Aged over 55 years
Ethnicity	European, Asian or Pasifika	Māori (48% identify as Māori, much higher than the national average of 17%)
Highest education level	University qualifications	No educational qualifications School-level 1 to 4 Certificates
Personal income	Over \$50,000 per year	\$50,000 or less per year
Work status	Employed full-time (39% are employed full-time compared with 50% nationally)	Unemployed Not in the labour force
Family types	Couple with children	Sole parents with children (20% cf. 15% nationally) Couples without children (32% cf. 28%)

Source: 2018 Census. Bases: All Far North residents for age, and ethnicity results. Residents aged 15 or more for income, highest education level, and work status results. Residents living in a family for family type results.

Incomes in the district are 29% lower than nationally

In the 2018 Census the median annual personal income of the district's residents aged 15 or more was \$22,600 compared with \$31,800 nationally (29% lower). In 2018, only 9% earned over \$70,000 per year.

The district has an older population than nationally

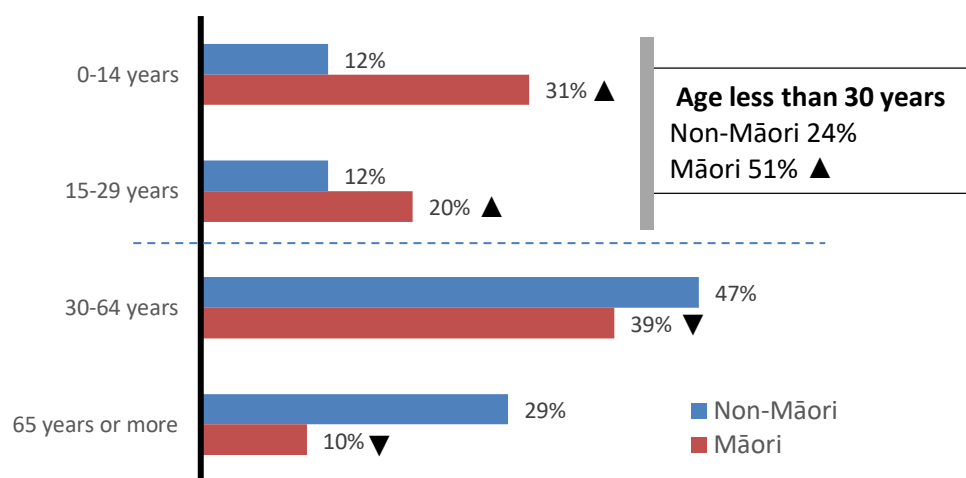
The median age of the resident population in the 2018 Census was 43.2 years, compared with 37.4 years nationally.

The Māori population has a younger age profile than non-Māori

Given that adults aged 15 to 29 are particularly at risk from alcohol harms, and children aged 0-14 are a vulnerable group for alcohol-related harms caused by others (such as domestic violence), it is important to note that the resident Māori population of the Far North has a much younger age profile than non-Māori residents.

In the 2018 Census the median age of Māori was 28.6 years compared with 58.6 years for non-Māori. The chart below illustrates the age profile of Māori compared with non-Māori residents:

Figure 2: Age Distribution of Far North Residents – Māori versus non-Māori



KEY: ▲ ▼ Māori significantly higher/lower than non-Māori $p < 0.05$

Base: Far North residents in the 2018 Census

5.3 Community deprivation

Deprivation levels for statistical area units are calculated from the following nine variables in 2018 Census data:

Table 3: Variables used to assess deprivation

People aged 18-64 receiving a means tested benefit
People living in households with equivalised income below an income threshold
People with no access to the Internet at home
People aged 18-64 without any qualifications
People aged less than 65 living in a single parent family
People not living in own home
People living in households with equivalised bedroom occupancy threshold
People aged 18-64 who are unemployed
People living in dwellings that are always damp and/or always have mould greater than A4 size

Given the district's population is less well educated than the national population, has lower incomes, has more single parent families, and is less likely to be in the workforce, it is not surprising that there are high levels of deprivation in the Far North.

The percentage of the district's population living in areas with different levels of deprivation is shown in the next table. As the table shows, almost seven out of ten residents (69%) live in areas with the highest rates of deprivation (deciles 9 and 10).

Table 4: Percentage of the Far North population living in areas with each deprivation decile

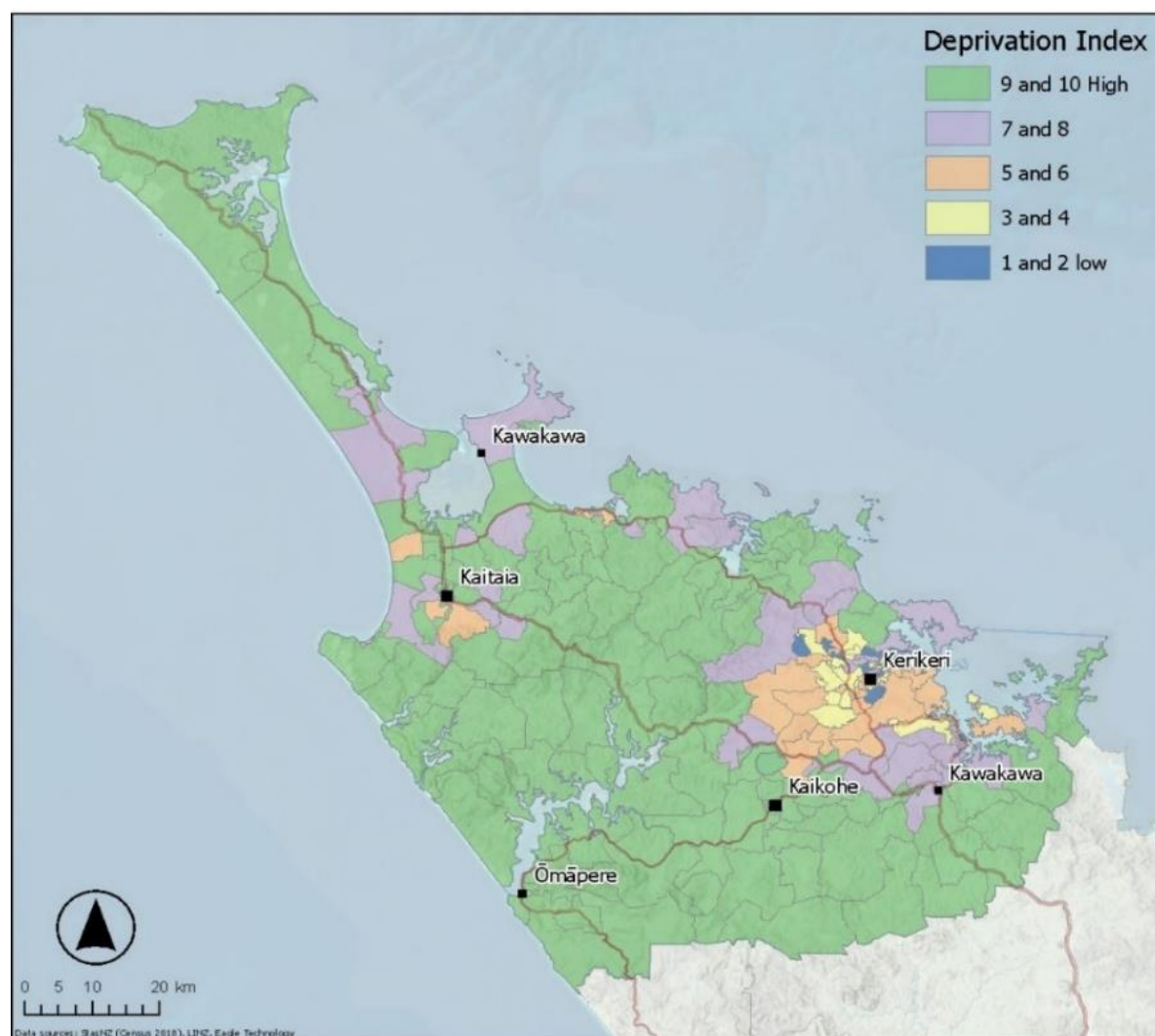
Deprivation decile	%
Deprivation decile 10 (highest level of deprivation)	42%
Decile 9	17%
Decile 8	11%
Decile 7	8%
Decile 6	6%
Decile 5	6%
Decile 4	6%
Decile 3	2%
Decile 2	2%
Decile 1 (least deprived)	1%

69%

Base: usually resident population from the 2018 Census. Total adds to more than 100% due to rounding

Deprivation levels in the district are illustrated in the following map. Deciles 9 and 10 (shown in green on the map) represent the highest levels of deprivation, while deciles 1 and 2 (shown in blue) represent the lowest levels of deprivation.

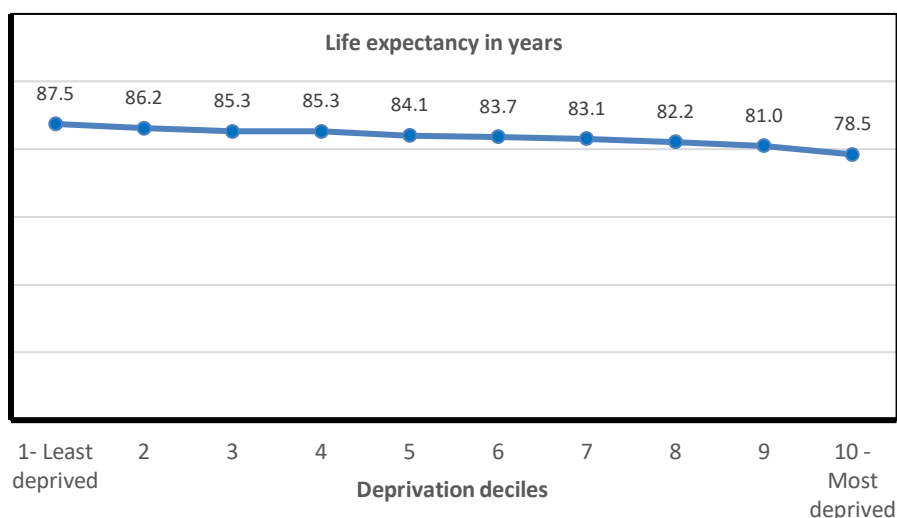
Figure 3: Far North District deprivation by area, 2018



Nationally, life expectancy is lower in more deprived areas

As illustrated in the next chart, life expectancy for those living in decile 1 neighbourhoods (least deprived) is 87.5 years, compared with 78.5 years for those living in decile 10 neighbourhoods (most deprived), a difference of 9.0 years.

Figure 4: Deprivation levels and average life expectancy in years, Stats NZ projections 2017-19¹⁰



Factors associated with high deprivation can compound the effects of alcohol-related harms

Some examples include:

- **stress and mental health issues** - deprivation indicators such as unemployment, poverty, housing instability, and limited access to resources can lead to high levels of stress and despair. Alcohol can become a coping mechanism for dealing with these pressures, which in turn can increase the risk of misuse
- **limited access to support services** - barriers like cost, limited access to transportation, or lack of information can prevent individuals from seeking help. Limited access to support can lead to untreated alcohol problems, prolonged harm, and more severe outcomes
- **higher vulnerability to health issues** - people from deprived areas often have poor overall health due to a lack of access to nutritious food, healthcare, and safe living conditions. Excessive alcohol use can compound these health problems, leading to higher rates of alcohol-related diseases, such as liver disease, cardiovascular problems, and mental health disorders
- **family and community impacts** - in deprived areas, alcohol misuse can have a pronounced impact on families and communities. Children growing up in homes where alcohol abuse is prevalent may experience neglect, abuse, or poor educational outcomes. Unsafe consumption of alcohol can also increase crime rates, domestic violence, and social instability, perpetuating deprivation across generations.

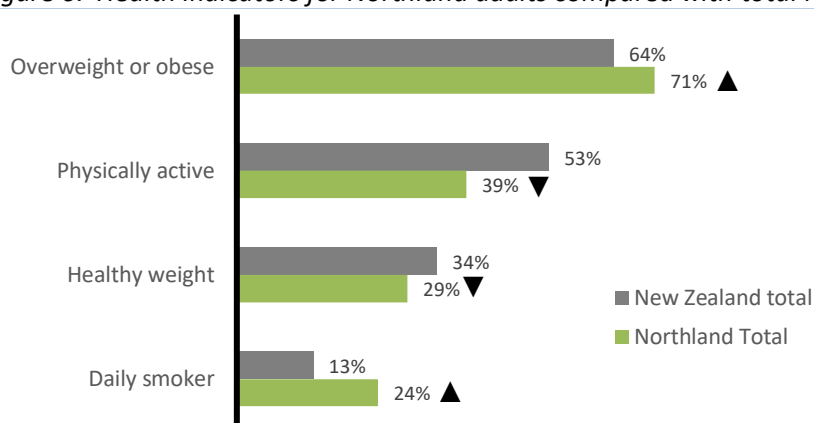
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5.4 Health indicators for Northland adults

Northland adults have relatively poor health in four areas in the New Zealand Health Survey

The Ministry of Health does not publish health statistics for the Far North District but does publish this data for the Northland Region for the period from 2017 to 2020¹¹. As the chart below shows, Northland adults aged 15 or more are significantly more likely than all New Zealand adults to be overweight or obese and to currently use tobacco daily while they are less likely to be physically active and/or a healthy weight. NB. For a wide range of other health indicators Northland results were a little worse than the national results, but these differences were not statistically significant.

Figure 6: Health indicators for Northland adults compared with total New Zealand adults, 2017-2020



KEY: ▲ ▼ Significantly higher/lower than the national total $p < 0.05$

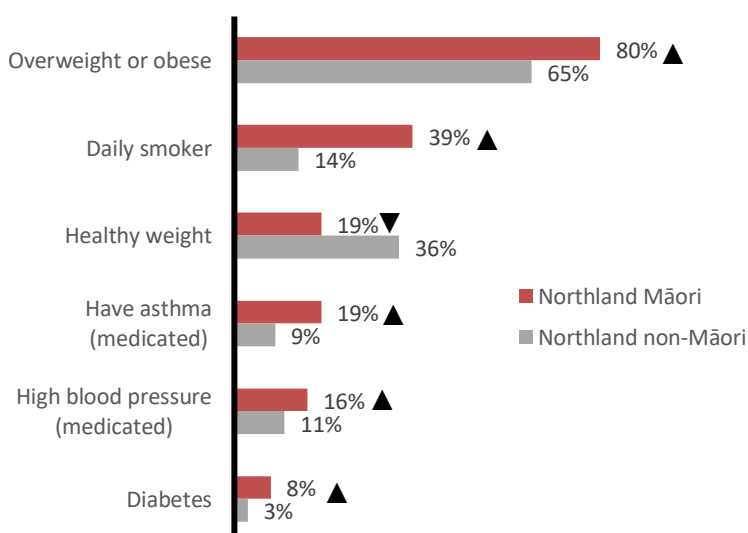
Base: Adults aged 15 or more. Age standardised results - this allows comparison of two groups that have different age structures without the different ages affecting the results

On several measures Māori in Northland are not as healthy as non-Māori

From New Zealand Health Survey results from 2017 to 2020¹², only 36% of Māori in Northland self-reported very good or excellent health compared with 51% of non-Māori adults.

Northland Māori adults aged 15 or more are significantly more likely than non-Māori to report being overweight or obese, to smoke tobacco daily, have asthma, high blood pressure, and diabetes. Māori are less likely to be a healthy weight than non-Māori.

Figure 7: Health indicators for Northland Māori adults compared with non-Māori



KEY: ▲ ▼ Māori significantly higher/lower than non-Māori $p < 0.05$

Base: Adults aged 15 or more. Age standardised results

6 The alcohol industry

6.1 Introduction

As stated in the 2010 Law Commission Report, *Alcohol in our Lives: Curbing the Harm*, New Zealand's alcohol industry is a "multi-billion-dollar sector, spanning a wide range of economic activities from growers, who produce the raw inputs... to the wineries, breweries and distillers who manufacture the alcohol; right through to the liquor retailers and the thousands of cafes, restaurants, bars and clubs which make up the hospitality sector"¹³.

Four main groups are involved in the production and sale of alcohol:

- Growers – e.g. vineyards
- Manufacturers – wineries, breweries, and distillers
- Retailers – supermarkets, bottle stores, grocery stores, and online distributors
- Hospitality venues – cafes, restaurants, bars, and clubs etc.

6.2 Economic impact

Key economic statistics for the national alcohol industry for the year ending March 2020¹⁴ are as follows:

- Total domestic retail sales - \$3.61 billion dollars (including imports)
- Total exports - \$2.09 billion
- Tax contribution to the government \$1.82 billion (including excise tax)
- Employment numbers – 10,210 direct jobs, 20,913 indirect jobs.

Total annual retail sales in the district are estimated on a pro rata basis as \$54 million in 2020 (i.e. national retail sales of \$3.61 billion x 1.5% - the district's percentage of the total population from the 2018 Census).

The alcohol industry supports both the tourism and hospitality sectors.

6.3 Employment by the alcohol industry in the district in 2023

In 2023, the Far North alcohol industry directly employed 168 individuals (130 in pubs, taverns, and bars, 28 in wine and other alcoholic beverage manufacturing, and 10 in brewing)¹⁵. Additionally, the industry indirectly employed workers in other areas, where alcohol sales only constitute part of business turnover. Examples of these areas include:

- supermarkets and grocery stores 1,420 employees
- the accommodation sector 876 employees
- restaurants and cafés 799 employees.

6.4 The industry promotes drinking in moderation

The alcohol industry promotes moderate drinking through initiatives like Lion's "Alcohol & Me"¹⁶ and The Life Education Trust NZ's "Cheers!" website¹⁷. The industry is also shifting towards producing more low- and no-alcohol products to meet consumer demand for "better for me" beverages with less alcohol, sugar, and carbohydrates¹⁸. This is a positive move, but to put this in perspective, the availability of very low-strength beers that are not classified as alcoholic beverages (up to 1.15% alcohol) increased by 2 million litres from 2014 to 2023, while in the same period the availability of high-strength beers (with more than 4.35% alcohol) rose by a much larger 71 million litres.

6.5 Benefits the alcohol industry brings to the Far North

Positive benefits the alcohol industry provides for the district include:

- support for the local economy through revenue generated and through direct and indirect employment
- on-licence premises are social hubs where people gather to socialise, network, and celebrate special occasions
- licensed restaurants offer patrons the opportunity to consume alcohol with food
- supermarkets, groceries, and bottle stores offer a convenient way to purchase alcohol
- tourists are attracted to:
 - vineyards, breweries, and distilleries for tastings and tours
 - local licensed restaurants to dine and consume alcohol
 - bars and taverns to socialise and enjoy entertainment, etc.
- sponsorship and funding of community groups and events.

7 The tourism sector

Section 78 of the Act states that if Council wishes to have a LAP it must prepare a draft LAP, having regard to:

- the demography of the district's residents including people who have holiday homes there
- the demography of people who visit the district as tourists or holidaymakers.

These areas are discussed below.

7.1 Tourist and holidaymaker demographics

As a popular holiday destination for both domestic and international visitors, the population of the Far North is boosted by many visitors, particularly over the summer months.

- an estimated 1.6 million visitors visit the district each year, including around 1.2 million domestic visitors (76% of the total) and 0.4 million overseas visitors (24%)¹⁹
- from MBIE statistics for short-term commercial accommodation²⁰, in the year ending March 2024 around 472,000 guests stayed for 1,086,000 guest nights in the district
- domestic visitors are largely from Auckland followed by other areas of Northland, while Australia is the main source of international visitors²¹
- those who own holiday homes are estimated to boost the district's population by around 13,000 to 19,000 people in the summer holiday period²²
- passengers on cruise ships also boost the population. These cruise ships visit the Bay of Islands on a regular basis from September through to April each year. In the 2023/24 season, 93 ships came to the Bay of Islands, carrying around 158,000 passengers (an average of 1,700 passengers per cruise ship)²³.

7.2 Economic and social impact of tourism

Tourism makes a significant contribution to the Far North economy:

- in the year ending October 2023, visitors to the district spent an estimated \$509 million dollars²⁴, including \$77 million on alcohol, food and beverages from retail outlets and \$91 million on food and beverage services. NB. Spending on alcohol specifically is not broken out in these figures
- Infometrics estimated the tourism sector employed 3,092 people in the Far North in the year ending March 2023²⁵
- the tourism industry is strongly seasonal – with a large peak of visitors in December and January and a smaller peak in April, coinciding with the Easter holidays²⁶
- tourism is concentrated in the Bay of Islands area, with Paihia recognised as the tourist capital of the Far North. As described in section 10.4, half the alcohol licences in the district are concentrated in the Bay of Islands Tourist Zone which is the centre of tourist activity
- reflecting the preponderance of domestic visitors, the main places that visitors stay are at friends' or relatives' houses, followed by motels, rented houses and holiday parks/camps²⁷
- visitors and holidaymakers also boost customer numbers at both on-licences and off-licences, especially in the peak summer months.

7.3 Contribution of the alcohol industry to the tourism sector

Visitors to the district enjoy a range of tourist attractions where they can consume alcohol, such as:

- winery and brewery tastings, tours and cellar door sales
- festivals and events where alcohol is available
- cruises in the Bay of Islands where alcohol is offered
- visiting historical hotels such as the Duke of Marlborough in Russell, the oldest licensed premise in New Zealand.

8 Alcohol consumption

8.1 Alcohol available for consumption nationally

Key findings regarding alcohol available for consumption in New Zealand from Stats NZ data²⁸ include:

- over the 15 years from 2009 to 2023, the volume of alcohol available for consumption in New Zealand has remained relatively steady, with the total volume in 2023 (477 million litres) only 1% higher than in 2009 (471 million litres)
- given the population has increased in this period, pure alcohol consumption per head by those aged 15 or more has decreased from a high of 9.6 litres in 2010 to 8.2 litres in 2023, a 15% decrease
- in 2023, for the 76% of the adult population who did drink in the past year²⁹ this equates to 10.8 litres of pure alcohol per drinker or 2.2 standard drinks per day. In other words, every drinker over 15 on average

consumes 2.2 standard drinks per day every day of the year e.g. 2.2 cans of beer (330ml, 4% alcohol) or 2.2 glasses of wine (100ml, 12.5% alcohol)

Spirits

- 97 million litres of spirits were available for consumption in 2023 including 81 million litres of spirit-based drinks such as ready to drink (RTD) spirits:
 - from 2018 to 2023 there was a strong increase in spirits availability (+21.3%) largely driven by spirit-based drinks (+22.7%)
 - RTDs are particularly attractive to young people due to their convenience, and appealing taste. They often come in sweet, fruity flavours that mask the taste of alcohol, making them more appealing to those who may not like the taste of traditional alcoholic beverages. This lowers the barrier for young or inexperienced drinkers to consume alcohol
 - there is strong evidence that the introduction of RTDs into the market increased alcohol consumption markedly among young females aged 14 to 17 years³⁰
 - RTDs are pre-mixed, meaning they are easy to consume without the need for mixing drinks or purchasing separate ingredients. They are often sold in single-serve cans or bottles, making them convenient for social occasions, parties, and on-the-go drinking
 - RTDs are typically inexpensive, which makes them accessible to young people who may have limited financial resources. The low cost encourages bulk purchasing, potentially leading to higher consumption
 - RTDs are frequently marketed with colourful, trendy packaging and advertisements emphasising fun, freedom, and social bonding, which resonates with young adults seeking social acceptance and enjoyment
 - the sweet, easy-to-drink nature of RTDs can make it difficult for young people to realise how much alcohol they are consuming. Since RTDs taste more like soft drinks, it's easy to drink large quantities quickly, increasing the risk of binge drinking, alcohol poisoning, and accidents of various types
 - a report on results from the New Zealand Health Survey³¹ found that in 2012/13, Māori were 2.1 times more likely to drink RTDs on a typical occasion compared with non-Māori drinkers. Individuals living in the most deprived neighbourhoods were twice as likely to consume RTDs as those living in the least deprived neighbourhoods.

Beer

- By volume, beer is by far the main alcoholic beverage consumed in New Zealand in 2023 (281 million litres). This is 2.8 times more than wine and 2.9 times more than spirits consumption.
 - overall, the volume of beer available for consumption dropped by 4.1% from 2018 to 2023
 - the availability of high-strength beer (over 4.35% alcohol) increased by 71 million litres over the last 10 years
 - there was 7.7 times the volume of very low alcohol beer (up to 1.15% alcohol) available for consumption in 2023 compared with 2014. Note, this high level of growth is based on relatively low volumes (2.3 million litres available in 2023 compared with 0.3 million litres in 2014, an increase of 2 million litres).

Wine

- 99 million litres of wine was available for consumption in 2023
 - this is 10 million litres less than in 2018 (-9.2%)
 - other countries are also experiencing falls in wine consumption and research in the UK indicates that this is a generational issue, with older consumers drinking wine more regularly and younger consumers tending to drink wine only on special occasions and in social settings³².

8.2 Dimensions of alcohol consumption

There are three main dimensions³³ that differentiate responsible alcohol consumption from excessive and inappropriate consumption:

1) the quantity of alcohol consumed per occasion

How much people drink in a single occasion, especially when drinking to excess (binge drinking) has physical and mental effects such as reduced coordination and reaction time, impaired judgement, and reduced peripheral and night vision. These effects increase the risk of immediate harms such as accidents, road crashes, acute health trauma, interpersonal violence, injuries, and fatalities.

2) frequency of drinking alcohol

How frequently people consume alcohol (even relatively small amounts) determines the cumulative effects of alcohol, on peoples' health. For example, daily drinking of even moderate amounts of alcohol per occasion over a

long period of time can lead to chronic diseases such as cirrhosis of the liver, diabetes, and various forms of cancer³⁴.

3) gender (male vs. female)

In general, after drinking the same amount of alcohol, women tend to have higher blood alcohol levels than men, and the immediate effects of alcohol usually occur more quickly and last longer in women than men. This means women are more susceptible than men to both the short-term and long-term negative effects of alcohol. Pregnant women should never consume alcohol due to the risk of Foetal Alcohol Spectrum Disorder (FASD) (see section 9.3).

8.3 Recommended consumption of alcohol

The following diagram from alcohol.org.nz shows recommended consumption levels of alcohol to avoid long-term health risks, risks of injury and risks for pregnant women.

Figure 8: 'Low-risk alcohol consumption recommendations



These levels are the subject of debate. For instance, the World Health Organisation (WHO) says there are no safe levels of alcohol consumption. “We cannot talk about a so-called safe level of alcohol use. It doesn’t matter how much you drink – the risk to the drinker’s health starts from the first drop of any alcoholic beverage. The only thing that we can say for sure is that the more you drink, the more harmful it is” - Dr Carina Ferreira-Borges, WHO Regional Office for Europe³⁵.

8.4 Alcohol consumption in Northland

Alcohol consumption in the past year in Northland

In 2017-2020, 83% of adults aged 15 or more in Northland consumed alcohol in the past year³⁶ higher than the national total in the same period (80%). Assuming the same proportion applies in the Far North suggests that 50,000 adults in the district consumed at least some alcohol in the past year.

Binge drinking

A quarter (26%) of the adult population in Northland were frequent binge drinkers in 2017-20³⁷ i.e. consuming at least six standard drinks per occasion at least monthly (estimated 13,800 people in the Far North), while 14% were very frequent weekly binge drinkers (8,400 in the Far North).

The Youth’19 Health Survey 2019³⁸ found that 22% of secondary school students in New Zealand reported binge drinking in the past month, with similar levels for female and male students (21% and 23% respectively). Binge drinking was more common amongst the following student groups:

- those aged 17 years or over (42%)
- rangatahi Māori (29%)
- 16-year-olds (29%)
- those living in rural areas (24%).

Hazardous drinkers

Hazardous drinkers are defined by the AUDIT test, which uses ten questions to assess 1) peoples’ alcohol intake, 2) their potential dependence on alcohol, and 3) their experiences of alcohol-related harm. In 2017 to 2020, 22% of adults in Northland were classified as hazardous drinkers. Assuming a similar proportion applies for the Far North, an estimated 13,200 Far North adults aged 15 or more are hazardous drinkers.

The proportion of hazardous drinkers in Northland increased by 38% from 2011/14 to 2017/20

From New Zealand Health Survey³⁹ results, the proportion of hazardous drinkers in Northland increased from 16% of those aged 15 or more in 2011-2014 to 22% in 2017-2020 (a 38% increase).

Demographics of alcohol consumption

The next table shows demographic groups in Northland who were more or less likely to consume alcohol in different ways in 2017 to 2020 from the New Zealand Health Survey⁴⁰. These results are age standardised, so in some cases they are slightly different from the figures stated previously (see the explanation at the bottom of the table)

Table 5: Alcohol consumption in Northland by demographics, 2017 to 2020

Type of alcohol consumption	Percent of total Northland adult population aged 15 plus	Lower incidence ▼	Higher incidence ▲
Consumed alcohol in the past year	83%	Deprivation quintile 5 residents (from the most deprived communities) 79% Aged 65 plus 76%	Aged 45 to 64 88%
Frequent binge drinkers (at least monthly)	26%	Aged 65 plus 21%	Deprivation quintile 4 residents 39% Māori 32% Males 32%
Very frequent binge drinkers (at least weekly)	15%	Females 10% Aged 65 plus 10%	Males 21% Aged 45-64 19% Māori 18%
Hazardous drinkers	25%	Females 18% Aged 65 plus 14%	Males 34% Māori 32% Aged 25 to 44 30%

Base: Adults aged 15 or more

Percentages are age standardised so that different demographic groups that have different age structures can be compared without the different ages affecting the results. This means that the percentages above are slightly different than those mentioned previously. NB. Results for deprivation quintiles 1 and 2 (the least deprived areas) are not included in the table due to small sample sizes in the Survey.

8.5 Where alcohol is consumed

Most alcohol is consumed off-premises

Nationally in 2018 70% of alcohol was consumed off-premises (e.g. at home or at a party) compared with 59% in 1980⁴¹.

Drinkers consume more per occasion off-premises than on-premises

A study⁴² that analysed data from the New Zealand Health Survey 2011 found that drinkers of all types consumed significantly larger quantities of alcohol per occasion at off-premise locations, such as at home or at a party, compared to on-premise locations where excessive alcohol consumption is monitored and not allowed.

Pre-loading, side-loading, and post-loading

A concerning aspect of the drinking culture in New Zealand involves pre-loading, post-loading, and side-loading:

- pre-loading is where people consume alcohol purchased from bottle stores and supermarkets at home, before going out to bars, taverns, night clubs, or other on-licence venues
- side-loading is where patrons leave an on-licensed premise to top up on alcohol purchased more cheaply from an off-licensed premise, before returning to the on-licence to socialise. This may be repeated several times. This is a problem for management of the on-licensed premise because they are unaware of the amount of alcohol consumed by these patrons
- post-loading (also known as backloading) refers to drinking alcohol purchased from a bottle store or supermarket that occurs after attending an on-licence venue e.g. on the way home or very commonly in a public place.

Motivations for this behaviour include:

- cost savings – alcohol is much cheaper when purchased from off-licences compared to bars and clubs
- social bonding – individuals drink in familiar, comfortable settings with others before heading out
- pre-loading enables people to get intoxicated before arriving at a venue where their consumption will be monitored

- side-loading means individuals can ‘top-up’ with cheap drinks outside a venue, rather than buying more expensive drinks at the venue itself.

Pre-loading, post-loading, and side-loading are associated with a range of alcohol-related harms such as:

- excessive drinking (getting drunk)
- disorderly anti-social behaviour, aggression, and violence
- unsafe activities such as driving under the influence.

An intercept survey⁴³ of pedestrians near bars in the Hamilton CBD in 2019 found that:

- 84% had been pre-loading
- pre-loading drinkers mostly purchased alcohol from liquor stores, rather than supermarkets
- 79% purchased alcohol for pre-loading on the same day they consumed it
- pre-loading drinkers had significantly higher breath alcohol content than other drinkers
- 87% of purchases that were made on the same day as consumption occurred took place before 9pm suggesting that earlier closing hours for off-licences would have little impact on this behaviour.

Pre-loading and side-loading is common in the Far North as noted by the owner of a hotel in the district who said: “the problems start at home where people pre-load”. He observed this is driven by the price of alcohol: “[named supermarket] is promoting a Steinlager 15 pack for \$28.99 (or \$1.93 per unit) which is a price lower than bars, restaurants or bottle stores can even purchase it”.

8.6 Who influences people to drink alcohol?

The Alcohol Use in New Zealand Survey 2019/20⁴⁴ identified who influences alcohol drinkers in Northland to drink less or to drink more. The top three influencers in each case were as follows:

Table 6: Who influences Northland adults to drink more or less?

Influencing people to drink less		Influencing people to drink more	
Partner	16%	Friends	25%
Family/whānau	11%	Partner	17%
Work colleagues	7%	Family/whānau	15%

Base: adults aged 15 or more

9 Alcohol-related harms and problems

9.1 Introduction

Under the Act, the definition of alcohol-related harm is broad and includes:

- any crime, damage, death, disease, disorderly behaviour, illness, or injury, caused, or contributed to, by the excessive or inappropriate consumption of alcohol
- any harm to society generally or to the community from the above factors.

The following section discusses harms arising from the inappropriate and excessive consumption of alcohol including physical and mental health problems, accidents and injuries, road crashes, injuries and fatalities, drownings, public disorder, crime, domestic violence, and the cost of these harms to society. This section also discusses harms to the community, including threats to the ‘amenity and good order’ of localities¹, and issues arising from exposure of vulnerable groups to alcohol outlets.

Northlanders report more harms to themselves from others’ drinking than from their own drinking

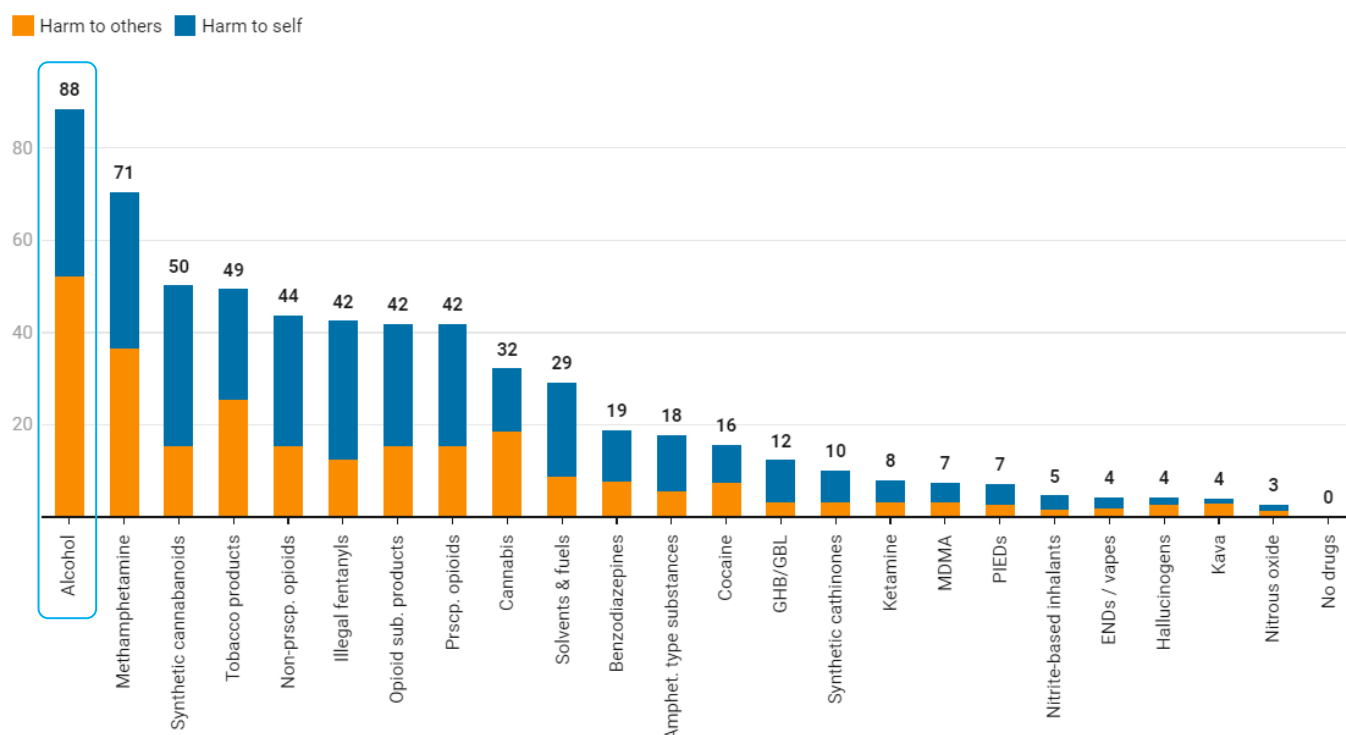
In the Alcohol Use in New Zealand Survey 2019/20, 45% of Northland adults said they had experienced alcohol-related harms in the past year, with 37% from others' drinking and 26% from their own drinking.

Alcohol is the most harmful drug consumed in New Zealand

A 2023 study⁴⁵ using a multi-criteria ranking process concluded that alcohol is the most harmful drug in New Zealand, (ahead of both methamphetamine and tobacco). Note the relatively high proportion of ‘harm to others’ calculated for alcohol.

¹ As described in section 106 of the Act, when considering the issue or renewal of licences the DLC or ARLA must have regard to ‘amenity and good order’ including matters such as noise, vandalism, the density of licensed premises in an area, and the purpose of adjoining land.

Figure 9: Ranking the harm of alcohol compared with other drugs in New Zealand



9.2 Demographic groups most at risk of alcohol-related harms

9.2.1 Children aged less than 15 years

Children are vulnerable to alcohol-related harm caused by others such as injuries of all types. They are vulnerable to exposure to alcohol outlets and associated alcohol advertising which can normalise alcohol consumption in their eyes. In a 2011 New Zealand study, almost one in five persons (17%) who had a heavy drinker in their life reported that their children were negatively affected by this person's drinking (e.g. being verbally abused, witnessing violence)⁴⁶. Children's exposure to violence has been shown to impact brain development. In a longitudinal study, children who had witnessed violence against their mothers scored lower on cognitive measures, with the effects being strongest in those traumatised in the first two years of life⁴⁷.

9.2.2 Young adults aged 15 to 24

Alcohol consumption during adolescence and young adulthood can have severe risks and long-lasting negative consequences according to the Ministry of Health⁴⁸, including impairment of brain development, potential damage to other organs, an increased risk of alcohol dependence and addiction later in life, higher chances of engaging in risky behaviours, and experiencing mental health issues. The Ministry strongly advises youth to delay alcohol use until at least the late teenage years and to drink in moderation, if at all. Young adults aged 15 to 24 nationally are more likely than other age-groups to be drivers in fatal road crashes who were affected by alcohol or drugs (see section 9.6).

A large New Zealand study⁴⁹ found that most cases of alcohol abuse and dependence were developed in adolescence and young adulthood, with almost 50% developing abuse or dependence by the age of 20 years and 75% by 25 years.

Studies⁵⁰ have shown that increased exposure to alcohol advertising leads many adolescents to start to drink earlier and to engage in heavier drinking once they have commenced drinking. As discussed in section 11.7.3, policies in a LAP may help reduce the exposure of young people to alcohol advertising and help avoid these problems.

9.2.3 Adults aged 25 to 44

This age-group also have some concerning 'red flags' around their drinking.

From the New Zealand Health Survey (2017 to 2020), Northlanders aged 25 to 44 are more likely than the total adult population to be hazardous drinkers (30% cf. 25% overall). See section 8.4.

NZ Police data for 2023 shows that this age-group was responsible for 50% of all prosecutions in the district where alcohol was a contributing factor.

9.2.4 Males

From the New Zealand Health Survey (2017 to 2020), Northland males aged 15 or more were:

- 2.1 times more likely than Northland females of the same age to be very frequent binge drinkers at least weekly in the past year (21% cf. 10%)
- 1.9 times more likely than Northland females to be hazardous drinkers (34% cf. 18%)
- 1.3 times more likely than Northland females to be frequent binge drinkers at least monthly in the past year (32% cf. 25%).

In addition, from NZ Police statistics for the Far North, males were responsible for 78% of prosecutions where alcohol was a contributing factor.

9.2.5 Māori

From the New Zealand Health Survey (2017 to 2020), Northland Māori aged 15 or more were more likely than the total adult population to:

- binge drink at least monthly in the past year (32% cf. 26%)
- be hazardous drinkers (32% cf. 25%)

The Health Promotion Agency⁵¹ noted that across New Zealand Māori are more likely to be exposed to risk factors that increase alcohol use and harm such as:

- living in deprived areas with a high density of alcohol outlets
- having an increased risk of hazardous drinking when living near these outlets
- greater exposure to cheap alcohol and advertising, especially among tamariki.

A 2023 New Zealand study⁵² identified published evidence that:

- Māori have a 35 percent greater probability than non-Māori of experiencing violence due to another's drinking
- Māori are over-represented in serious traffic crashes involving alcohol and tamariki
- Māori children are more likely to be killed or seriously injured in alcohol crashes than non-Māori children.

Māori males

The New Zealand Health Survey results also show that Māori males, are at particular risk from excessive and inappropriate alcohol consumption. See the following table:

Table 7: Alcohol consumption indicators for Northland adults aged 15 or more, 2017-20

Indicator	Total %	Total Māori %	Māori females %	Māori males %
Frequent binge drinkers - at least monthly in the past year	26%	32%	30%	34% ▲
Very frequent binge drinkers - at least weekly in the past year	15%	18%	13%	24% ▲
Hazardous drinkers	25%	32%	27%	38% ▲

Base: Adults aged 15 or more. Results are age standardised

Māori females

The Alcohol Use in New Zealand Survey 2019 to 2020⁵³ recorded that Māori females across New Zealand were more likely to have experienced harm from someone else's drinking (54%) compared with Māori males (42%).

Māori women have a significantly higher prevalence of drinking during pregnancy relative to other ethnic groups, leading to estimates of higher rates of FASD⁵⁴.

Tamariki

As noted in section 8.4, the Youth'19 Health Survey conducted in 2019 found that 29% of Māori secondary school students reported binge drinking in the past month, compared with 22% of all secondary school students.

9.3 Physical health issues

Alcohol is a risk factor for many diseases

Alcohol use has been linked to over 200 health conditions⁵⁵ such as liver disease, cardiovascular issues, many types of cancer, stroke, chronic gastritis and pancreatitis, type 2 diabetes, anaemia, and impaired brain development until the early 20s. Drinking any amount of alcohol while pregnant can severely affect the unborn baby.

The Far North has a very high rate of hospital admissions wholly attributable to alcohol

Excluding Emergency Department (ED) admissions, the rate of hospital admissions wholly attributable to alcohol in the Far North was 111.7 admissions per 100,000 people per year in the period from 2016 to 2018⁵⁶. This admission rate placed the Far North in 6th place out of 64 territorial authorities in New Zealand that were measured (a relatively poor result).

The hospital admission rate in the Far North caused by alcohol consumption is higher than 20 years ago

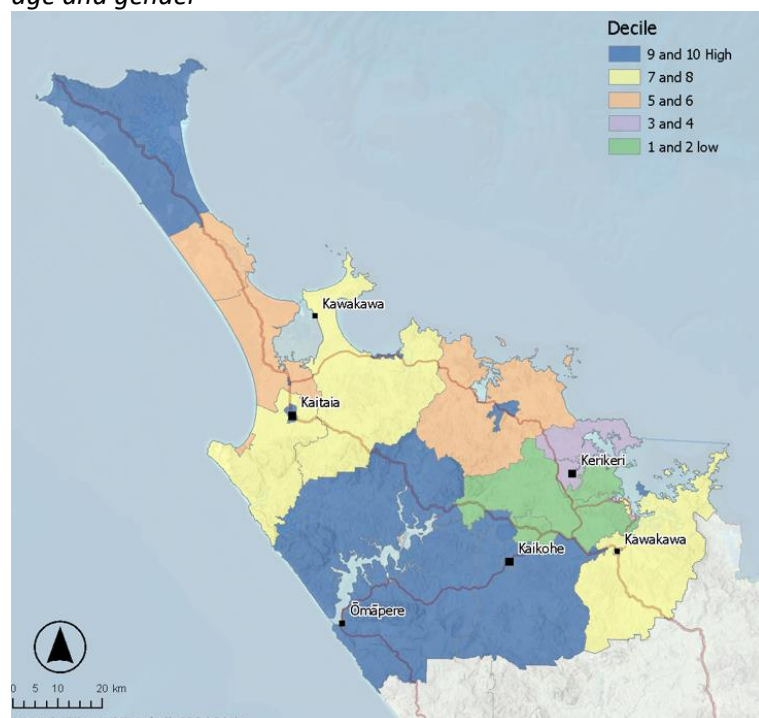
In the period from 2006 to 2008, the Far North was ranked 20th out of 64 territorial authorities with 60.9 hospital admissions wholly attributable to alcohol per 100,000 people per year compared with 111.7 admissions per 100,000 people in 2016 to 2018.

Mapping Far North District hospital admissions attributable to alcohol

The Regional Public Health Unit analysed data for hospital admissions wholly or partly attributable to alcohol for the period from 2016 to 2021. The following map shows deciles for these hospital admissions. Deciles are calculated in reference to admission levels across New Zealand. Each decile represents 10% of the national total, so decile 10 represents an area that is in the top 10% of admission rates. Deciles 9 and 10 together represent areas that are in the top 20% of New Zealand hospital admission rates.

The map shows that the highest levels of hospital admissions attributable to alcohol (decile 9 and 10 – shown in blue on the map) were recorded in: North Cape, Awanui, Kaitiā East, Kaitiā West, North Hokianga, South Hokianga, Ōmāpere-Ōpononi, Ōkaihau, Ngapuhi-Kaikou, Kaikohe, Moerewa, Kāeo, Taipā Bay-Mangōnui, and Russell.

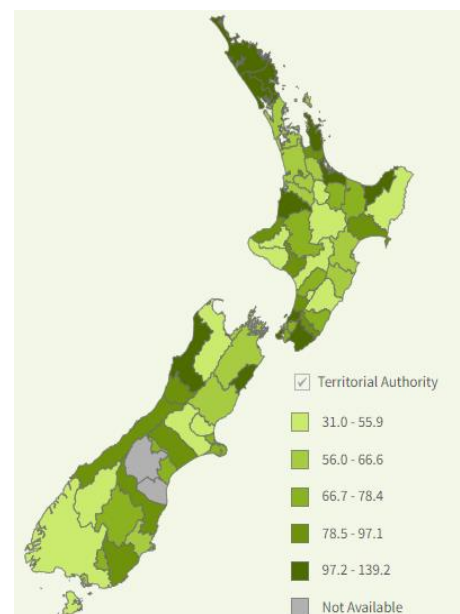
Figure 11: Far North District hospital admissions wholly or partly attributable to alcohol 2016 to 2021, adjusted for age and gender



Nationally, alcohol is the leading cause of death for those aged 15 to 49

From 2019 statistics, alcohol was the leading cause of death among those aged 15 to 49 in New Zealand⁵⁷. Main associated causes include self-harm and violence, cardiovascular diseases, road crashes, neurological disorders, and use of other substances.

Figure 10: Hospital admissions wholly attributable to alcohol 2016 to 2018 by territorial authority.



The Far North has a 70% higher mortality rate wholly attributable to alcohol than the national average

In the Far North in the period from 2007 to 2018, 7.8 deaths per 100,000 people per year were wholly attributable to alcohol - 70% higher than the national average (4.6).

Foetal Alcohol Spectrum Disorders (FASD)

FASD (Foetal Alcohol Spectrum Disorders) is the term for abnormal development of the foetus due to alcohol consumption during pregnancy. Alcohol can pass directly to the foetus, causing miscarriage, stillbirth, low birth weight, and FASD. Individuals with FASD face challenges in motor skills, physical health, learning, memory, attention, communication, emotional regulation, and social skills. There is no safe amount of alcohol exposure during pregnancy.

According to Alcohol Healthwatch⁵⁸:

- around half of the children and young people in Oranga Tamariki care are affected by FASD
- around 80% of adults with FASD cannot live independently without support
- children and adolescents with FASD have a 95% lifetime likelihood of experiencing mental health issues
- individuals with FASD have a much higher risk of suicidal behaviour than the general population.

A 2023 study⁵⁹ found that 27% of New Zealand women consumed alcohol during their pregnancy (often before they are aware they are pregnant). Assuming a similar percentage applies in the Far North, around 230 new-born babies are at risk of FASD each year in the district. In Northland around 200 babies each year are estimated to be born with FASD. Estimates for the Far North are not available.

Cancers

Alcohol is classified by the International Agency for Research on Cancer as a Group 1 carcinogen, the highest risk group, which also includes asbestos, radiation, and tobacco. Drinking alcohol raises the risk of developing cancer in 27 different areas of the body, including the mouth, oesophagus, stomach, breast, liver, colon, and rectum.

A 2015 article in the New Zealand Medical Journal⁶⁰ noted that:

- cancers account for 30% of all alcohol-attributable premature deaths in New Zealand
- breast cancer is the leading cause of alcohol-attributable deaths among females in New Zealand.

More than a third of these breast cancer deaths were associated with consuming less than two standard drinks per day.

Organ damage

Long-term or heavy drinking can cause liver and heart disease, as well as inflammation of the pancreas. Almost all heavy drinkers develop fatty liver disease, which is usually reversible if heavy drinking ceases. Persistent heavy drinking can lead to liver inflammation and eventually scarring of the liver (cirrhosis).

9.4 Mental health disorders

Excessive alcohol consumption is associated with many mental issues

Alcohol can reduce stress and tension in low doses. However, in higher doses it can create, rather than relieve, stress, and can make people sad, aggressive, and/or prone to mood swings. Mental health disorders associated with excessive alcohol consumption include depression, anxiety, bipolar disorders, psychosis, and suicidal thoughts and behaviours⁶¹. Mental health issues can fuel alcohol use, and alcohol use can fuel mental health issues.

Mental effects of having a heavy drinker in one's life

A New Zealand survey conducted in 2011⁶² revealed:

- a third of those with a heavy drinker in their life reported lower levels of well-being, as well as anxiety and depression
- people with greater exposure to heavy drinkers in their life are less satisfied with their life, health, personal relationships, and have lower community connectedness.

Dementia

A UK study involving over 300,000 drinkers⁶³ found that there is no level of alcohol consumption that does not increase the risk of dementia.

Suicide

Consumption of alcohol significantly increases the risk of suicide⁶⁴. A study of New Zealand coronial data from 2007 to 2020⁶⁵ found that acute alcohol use was involved in 27% of all suicide deaths for those aged 15 or more.

9.5 Alcohol-related accidents and injuries

Several types of accidents and injuries are associated with unsafe alcohol consumption:

- **Falls** – a New Zealand study found that consuming three or more standard drinks in the previous six hours increased the risk of a fall-related injury by about 12 times⁶⁶
- **Fire** – alcohol is implicated in fatal fires in association with smoking and unattended cooking. A study conducted in the 1990's in New Zealand⁶⁷ found alcohol to be a factor in 70% of fire fatalities among adults aged 17 years and over
- **Occupational injuries** – in New Zealand, in 2003, 20-25% of occupational injuries presented at an emergency department involved intoxicated workers⁶⁸
- **Injuries to children** – New Zealand reports in 2006⁶⁹ and 2009⁷⁰ found heavy parent/caregiver drinking to be associated with a range of negative outcomes for children and adolescents including drowning, falls, motor vehicle accidents, poisoning, drowning and suffocation.

In 2018, 128,963 ACC claims were attributable to alcohol⁷¹.

9.6 Drink driving and road crashes

Consuming even small amounts of alcohol increases the risk of road crashes

The risk of road crashes increases due to slowed reaction times, dulled judgement and vision, fatigue, increased risk-taking behaviour, and not wearing a seatbelt etc.

Fifty milligrams per 100 millilitres of blood is the current legal limit for drivers 20 years or older. At this limit, drivers are still twice as likely to have a crash as a driver with zero blood-alcohol.

Nationally young adults are the most at-risk group for fatal road smashes

Ministry of Transport data for fatal crashes shows that those aged 15 to 19 are the most at risk of a fatal crash, followed by the 20 to 29 age group.

Younger drivers in fatal road crashes are more likely than older drivers to have consumed alcohol or drugs

Nationally, younger drivers in fatal crashes are relatively more likely to be affected by alcohol/drugs than older drivers, peaking at 50% of those aged 15 to 19, compared with the national average of 30%.

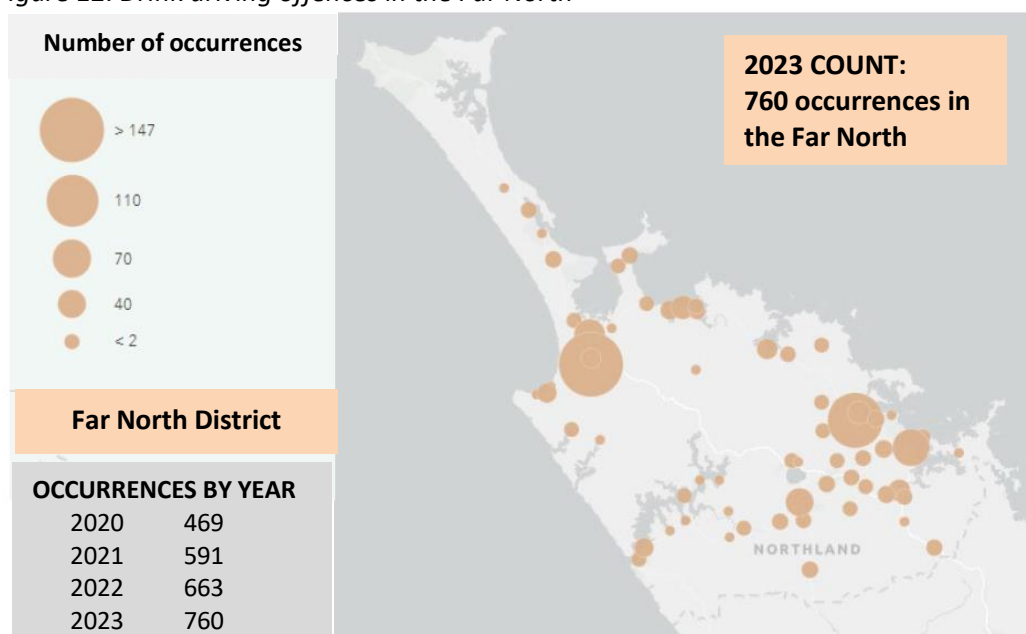
Driving under the influence is more common in Northland than nationally

In 2019/20, 28% of adult drinkers aged 15 or older in Northland reported driving after drinking in the past year, compared to the New Zealand average of 22%⁷².

Police records of drink-driving in the Far North

In 2023 the Police recorded 760 occurrences of drink driving in the district. The records show that driving under the influence was most common in Kaitiāia (>147 cases), Kerikeri (>110 cases), and Paihia (>70 cases). See the map below that was provided by the Police in response to an Official Information request:

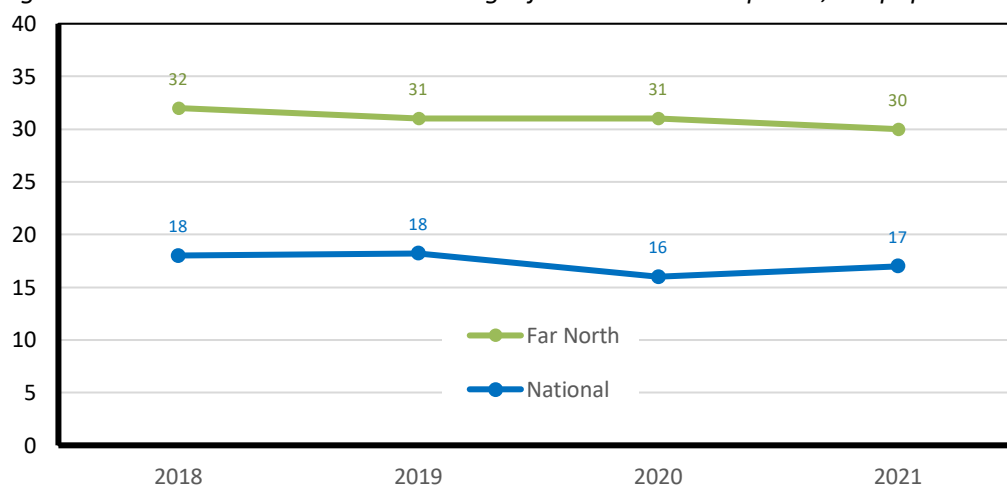
Figure 12: Drink driving offences in the Far North



The rate of alcohol-related crashes causing injuries is higher in the Far North than nationally

The rate of alcohol-related crashes causing injuries in the Far North declined slightly from 2018 to 2021. However, this rate is 76% higher than for New Zealand overall (30 injury crashes per 10,000 people in 2021 for the Far North compared with 17 nationally).

Figure 13: Alcohol-related crashes causing injuries – crash rate per 10,000 population per year⁷³, 2018 to 2021



Alcohol and drug-related road crashes in the Far North

From 2018 to 2022 in the Far North⁷⁴ there were 37 fatal crashes, 35 serious injury crashes, and 159 minor injury crashes where driver alcohol and/or drugs were a contributing factor. In these crashes, 41 people died, 75 people were seriously injured, and 255 people suffered minor injuries.

Considering the 37 fatalities in the district where alcohol or drugs were a contributing factor, toxicology results found that 23 (63%) had alcohol in their bloodstream.

When alcohol/drug affected crashes occur in the Far North

A LAP may regulate the opening and closing times of licensed premises; hence, the following results are relevant. The table below shows:

- alcohol/drug affected crashes are spread across the week, with Wednesdays (16%), Saturdays (21%) and Sundays (17%) being the main days when crashes occur
- the periods from 4pm to 8pm (28%) and 8pm to midnight (27%) together account for 55% of these crashes.
- by comparison, the period from 4am to midday is relatively 'quiet' for these crashes (12% of the total).

Table 8: Fatal and injury crashes in the district with driver alcohol/drugs as a factor, by time of day and day of week (percent of all crashes, 2018 - 2022)

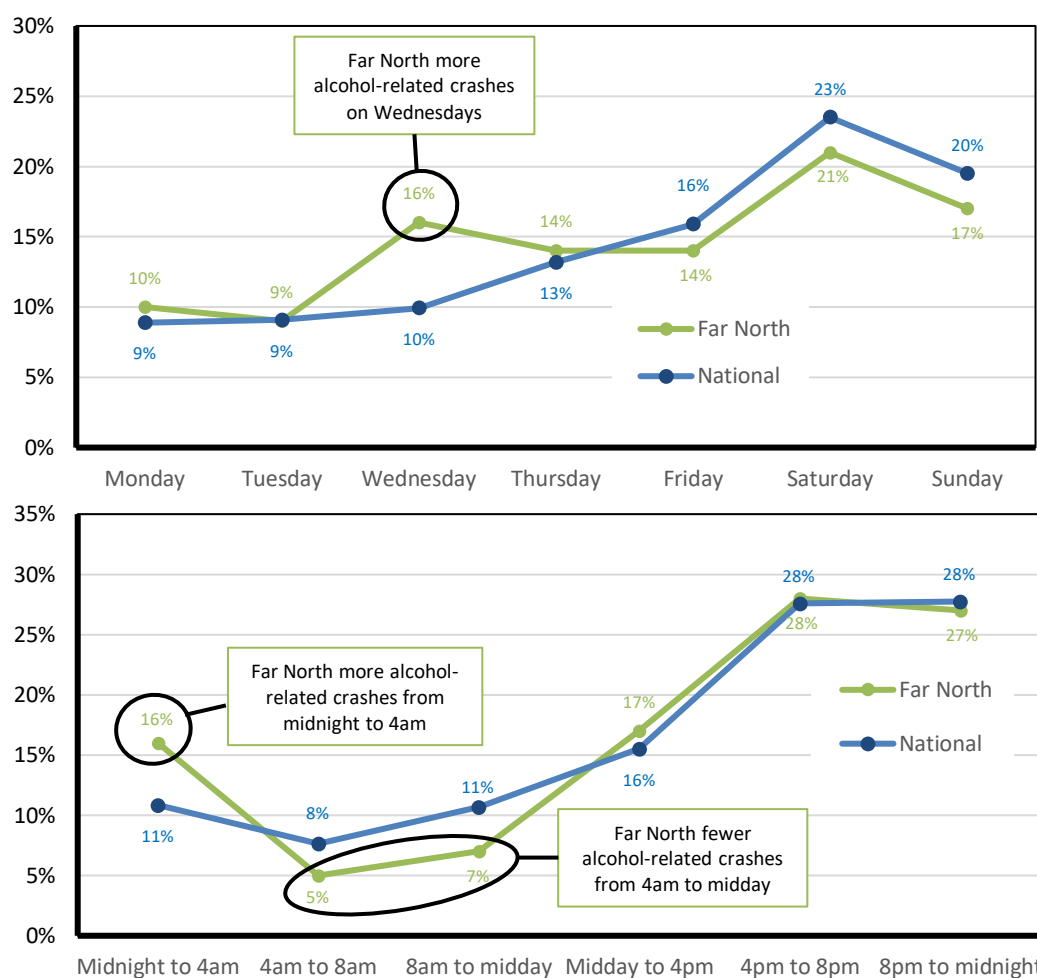
Day of the week	%	Time of day	%
Monday	10%	Midnight to 4am	16%
Tuesday	9%	4am to 8am	5%
Wednesday	16%	8am to midday	7%
Thursday	14%	Midday to 4pm	17%
Friday	14%	4pm to 8pm	28%
Saturday	21%	8pm to midnight	27%
Sunday	17%	Total	100%
Total	100%		

Base: 231 road crashes in the Far North where alcohol or drugs were a factor.

Timing of road crashes in the Far North compared with nationally

Comparing the timing of alcohol/drug affected crashes in New Zealand for the period from 2020 to 2022 with the timing of these crashes in the Far North for 2018 to 2022 shows the following pattern:

Figure 14: Percent of all alcohol/drug-related fatal and injury crashes by day of the week and time of the day



9.7 Water-related accidents and drowning

Excessive alcohol consumption near water can:

- decrease survival rates due to higher susceptibility to hypothermia, poor judgment on when to swim to shore, and increased risk of vocal cord spasms
- increase accident and drowning risks due to lack of coordination, disorientation, slower reaction times, impaired judgment, and greater risk-taking.

US research on army personnel⁷⁵ found a 10-fold increase in reckless behaviour, such as violating safety rules and swimming in unauthorised areas, when drinking.

From 2014 to 2023, 21% of drowning fatalities in the Far North were associated with alcohol

From 2014 to 2023, Water Safety NZ reported 53 drowning deaths in the Far North, with alcohol found to be a contributing factor in 11 cases (21%). This is likely to be under-reported, as toxicology reports from the coroner have not been provided for all drownings.

Maritime fatalities in the Far North

From January 2018 to March 2024, Maritime NZ reported 3 fatalities involving marine vessels in the Far North, with alcohol involved in 2 cases and probably involved in the third case.

9.8 Disorderly behaviour in public and its impact on the amenity and good order of localities

Problems of disorderly behaviour

People drinking to excess in public can cause many problems for the public including:

- being loud and unruly
- vomiting or urinating in public
- intimidating or assaulting others
- damaging property
- littering etc.

Police records of alcohol-related harm in public spaces in the Far North

In 2023 the Police recorded 1,174 occurrences of alcohol-related harm in public spaces in the district. These incidents were most common in Kaitiāia (>222 cases), Kerikeri (>170 cases), and Paihia (>110 cases).

Examples of public disorder in the Bay of Islands Tourist Zone

Some comments from objectors to the renewal of an on-licence in Paihia in 2023 illustrate the impacts of alcohol-related disorder encountered by residents and the police:

“continual trouble with late night drunkenness, noise and fighting and speeding vehicles”

“the town [has] been seriously impacted by alcohol related violence, general disorder, noise and unrest”

“we’ve been affected by late night music and people noise”

“I am cautious to walk down Kings Road even during daylight hours and have been forced off the footpath by drunk men and been verbally threatened”

“after the bars close, people would return to their cars and continue partying till 2am or even 4am in the morning knowing that there was no police in the area to move them on. The result would be that the street would be left strewn with rubbish, bottles and cans”

“due to the amount of intoxicated people that come out onto the street when all the bars close there is never a night when a fight or disorder does not break out”.

Problems affecting the amenity and good order of localities in New Zealand

A recent qualitative study⁷⁶ undertaken with residents of a range of New Zealand neighbourhoods where liquor store licences were granted or renewed despite community objections noted multiple issues at the local level:

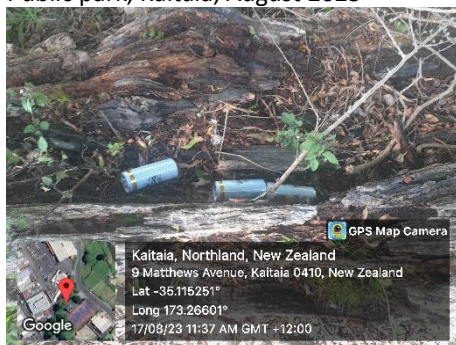
- people avoiding areas near these liquor stores e.g. shops, parks, streets, and alleys
- parents restricting children’s activities (e.g. not letting children walk to school past these areas)
- visibility of liquor stores near schools and shops where children frequent was felt to normalise alcohol and contribute to underage drinking
- littering of cans and bottles including broken bottles was a significant safety risk
- intimidating behaviour by intoxicated people including fighting, swearing, and shouting
- some residents had been verbally abused, approached or had objects thrown at them
- residents felt the visibility of liquor stores and alcohol in the community also encouraged young people to drink.

This study concluded, “alcohol supply, public drinking and related noise and rubbish consistently reduced amenity (attractiveness) and perceptions of safety in the suburban neighbourhoods”.

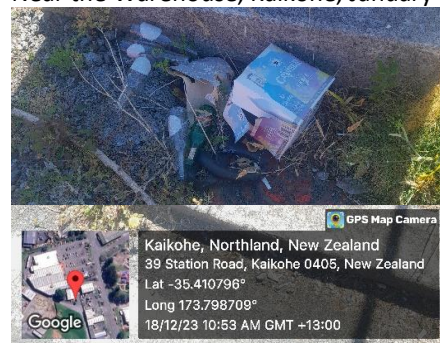
Photographic evidence of alcohol litter in the Far North

Te Whatu Ora (Ngā Tai Ora – Public Health Northland) has taken hundreds of date-stamped and geo-located photographs of alcohol litter around the district. These photos capture discarded alcohol bottles, cans, and cartons as well as graffiti and vandalism close to where this litter was photographed. Some examples are included below:

Public park, Kaitiāia, August 2023



Near the Warehouse, Kaikohe, January 2023



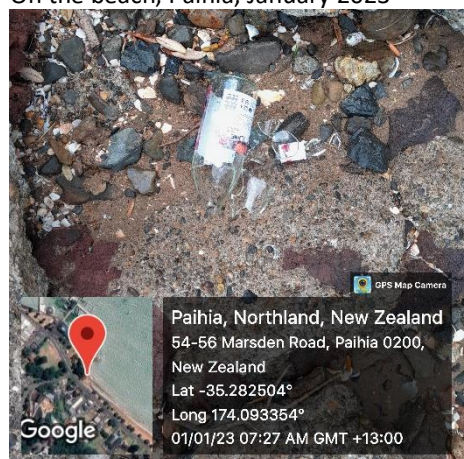
Close to Liquorland and Countdown, Kerikeri, June 2024



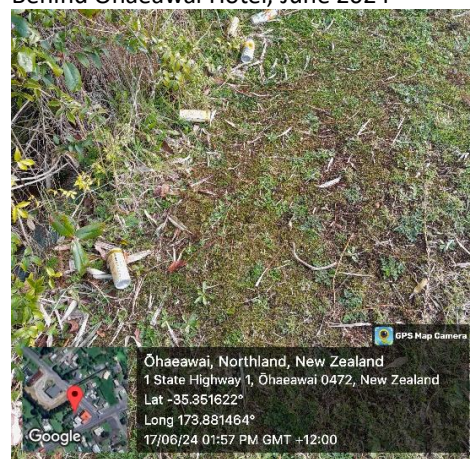
Near The Shed, Kaikohe, October 2023



On the beach, Paihia, January 2023



Behind Ōhaeawai Hotel, June 2024



9.9 Alcohol-related prosecutions

In 2023 Police prosecuted a total of 707 offenders in the Far North where alcohol was a contributing factor in the offending⁷⁷ (ACF offences). This represents roughly three out of ten (29%) of all prosecutions in 2023.

Main statistical area units where these ACF offences occurred were Kerikeri (99 offences), Kaitiāia West (95), Kaitiāia East (72), Paihia (56), Kaikohe (42) and Taipa Bay-Mangōnui (32). Over three-quarters of these offences (77%) occurred in public spaces (mainly traffic and vehicle offences such as drink-driving), while 16% were residential offences.

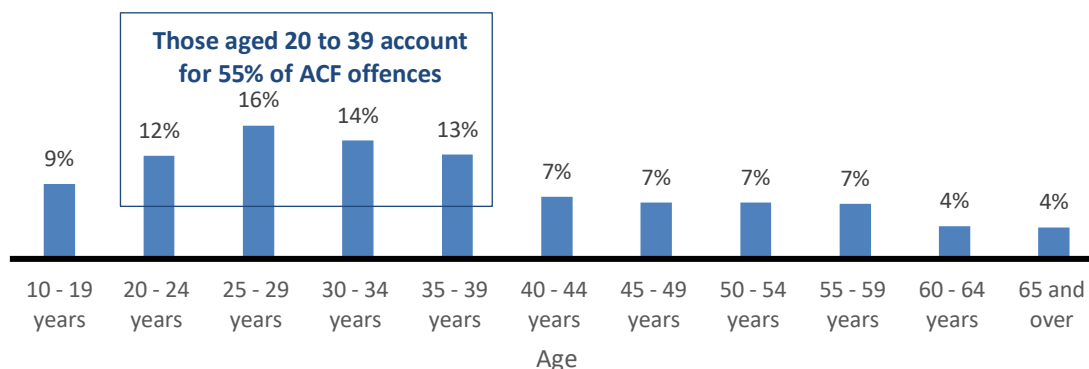
Main types of ACF offences are listed below. The leading type of ACF offence was Traffic and vehicle offences (450 offences), followed by Acts intended to cause injury (101 offences).

Table 9: Main types of ACF offences in the Far North in 2023]

Types of offences	Number of ACF offences
Traffic and vehicle	450
Acts intended to cause injury	101
Dangerous or negligent acts endangering persons	58
Public order offences	29
Property damage and environmental pollution	13
Unlawful entry with intent, burglary, break and enter	12
Abduction, harassment, and other offences against a person	10

Almost eight out of ten of (78%) offenders were males and almost seven out of ten (68%) were Māori. The ages of offenders are illustrated below.

Figure 15: Age of ACF offenders in the Far North in 2023



In 2023 the police attended 2,408 incidents in the district where alcohol was a contributing factor. This number includes incidents where an offender was charged as well as other incidents and occurrences e.g. when someone was issued a verbal warning. The next table shows the timing of these incidents. Two-thirds (64%) had start times from 4pm to midnight.

Table 10: Alcohol-related incidents in the Far North attended by the police in 2023 by start time of the incident

Time of day	%
Midnight to 4am	15%
4am to 8am	4%
8am to midday	7%
Midday to 4pm	10%
4pm to 8pm	27%
8pm to midnight	37%
Total	100%

Base: 2,408 incidents attended by the police where alcohol was a contributing factor.

9.10 Alcohol-related violence and aggressive behaviour

Association between excessive alcohol consumption and violent behaviour

People who drink to excess have a high probability of becoming aggressive and violent.

Prevalence of alcohol-related violence

According to Alcohol Healthwatch, alcohol is involved in one-third of all violence (33%), one-third of all family violence (34%), over half of all sexual assaults (57%) and half of all homicides (50%)^{78 79}.

Aggression experienced by frontline response staff

Frontline response staff such as police, ambulance officers, Emergency Department (ED) staff and Council's enforcement officers are highly likely to experience violence and aggression. In a 2014 survey⁸⁰ of Australasian ED staff, 98% of these staff in Australia and New Zealand reported alcohol-related verbal aggression and 92% reported physical aggression, with 68% experiencing verbal aggression frequently.

Family/whānau violence and maltreatment of children

Some key findings about alcohol-related domestic violence include:

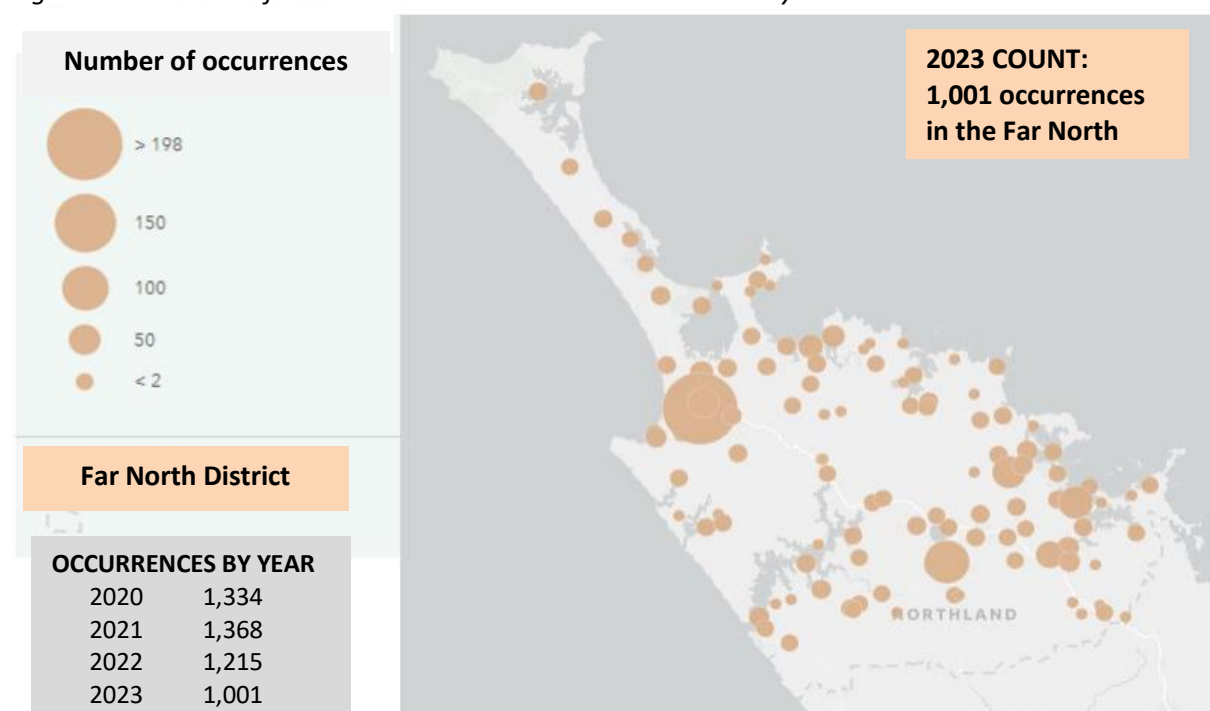
- alcohol is involved in one-third of all family violence incidents in New Zealand (34%)⁸¹
- responding to family violence accounts for 41% of frontline Police Officers' time⁸². On average, across New Zealand, Police respond to a family violence incident every five minutes
- almost one in five persons (17%) who had a heavy drinker in their life reported that their children were negatively affected by this person's drinking (e.g. being verbally abused, witnessing violence)⁸³
- children's exposure to violence has been shown to impact brain development. In a longitudinal study, children who had witnessed violence against their mother scored lower on cognitive measures, with the effects being strongest in those traumatised in the first two years of life⁸⁴
- wāhine Māori are more likely than other demographic groups to experience violence committed by someone under the influence of alcohol⁸⁵.

Police records of alcohol-related family/whānau violence in the Far North

1,001 instances of alcohol-related family violence in the Far North were recorded by the Police in 2023. Particular 'hot spots' include Kaitiāia (with over 198 instances) as well as Kaikohe, Kerikeri, and Paihia (all with 50 or more

instances). These incidents take up a large proportion of police time in the district. See the map below provided by the police:

Figure 16: Incidents of alcohol-related domestic harm attended by the Police in the Far North



Family/whānau violence - evidence from Whiria Te Muka regarding the Te Hiku area

Information was provided by Whiria Te Muka, a partnership initiative between the New Zealand Police and Te Hiku Iwi Development Trust, which aims to prevent and reduce family/whānau violence, while striving for Mana Tangata for the people of Te Hiku. Whiria Te Muka notes that alcohol is consistently the largest recorded trigger of family/whānau violence reported to the Police in Te Hiku. The table below summarises statistics for family/whānau violence from 2019 to 2023 after investigation by Whiria Te Muka:

Table 11: Family/whānau violence triggered by alcohol in the Te Hiku area

Year	Number of family violence 111 calls to the Police	Number and percent of these incidents triggered by alcohol		Total number of people affected in incidents triggered by alcohol	Number of children aged under 17 affected
2019	1,390	318	23%	794	140
2020	1,632	338	21%	875	166
2021	1,539	354	24%	772	156
2022	1,505	347	23%	739	153
2023	1,376	329	24%	783	178
Total	7,442	1,686	23%	3,963	793
Average per year	1,488	337	23%	793	159

Almost a quarter (23%) of family violence 111 calls to the Police from 2019 to 2023 in Te Hiku were triggered by alcohol, with 3,963 people including 793 children affected by these incidents.

Alcohol-related family/whānau violence increases in the Christmas/New Year period

Whiria Te Muka reported that alcohol is even more of a trigger for family violence over the Christmas/New Year period with a reported 30% of all family/whānau violence incidents in this period being triggered by alcohol consumption. The study period was December 2019 to January 2020.

9.11 Financial harm to individuals and households

From the Alcohol Use in New Zealand Survey⁸⁶, 12% of drinkers in Northland in 2019/20 reported feeling worried or stressed about money because of their drinking. From the 2012/13 wave of this Survey⁸⁷, more Māori drinkers reported harms to their financial position due to their drinking, when compared with European/others. Māori drinkers were also found to be twice as likely to be absent from their work because of their drinking.

9.12 Broad social and economic costs of alcohol-related harms

Broad economic and social costs from alcohol-related harm include:

- healthcare costs, including ambulance, Emergency Department, hospital, Addiction Services, counselling, and life-time care for many FASD patients
- social welfare costs
- policing, courts, and prison costs
- costs of mortality from suicides, car crashes, and alcohol-related diseases
- work productivity costs relating to absenteeism, and poor work performance
- unemployment costs
- costs of domestic violence
- accident compensation costs, etc.

A recent report from NZIER estimated the cost of alcohol-related harm for the country was \$9.1 billion⁸⁸ in 2023.

By comparison, retail sales of alcohol were \$3.61 billion and excise tax revenue were \$1.82 billion in 2020⁸⁹.

Figure 17: Costs from alcohol-related harms outweigh revenue



Cont'd

10 Alcohol licences

10.1 Types of licences

There are four types of alcohol licences issued by the DLC:

1. **On-licences** – which allow the sale and consumption of alcohol on the licensed premises. These premises include bars, pubs, taverns, restaurants (including BYO), cafés, and similar establishments where alcohol is served and consumed on-site.
2. **Off-licences** – include retail outlets such as liquor stores, supermarkets, and groceries where customers purchase alcohol to consume elsewhere, such as at home. An off-licence is required for the online sale of alcohol and an online provider can distribute alcohol throughout New Zealand
3. **Club licences** – the sale and consumption of alcohol under a club licence is typically restricted to members and their guests. These clubs include sports clubs, social clubs, and similar organisations. Clubs with a 'permanent charter' are not subject to licencing under the Sale and Supply of Alcohol Act 2012 and are not covered by the provisions in a LAP, including trading hours.
4. **Special licences** – allow the sale or supply of alcohol at an event or series of events or to be consumed at another place other than a licensed premise.

A premise may hold more than one type of licence e.g. a winery may serve wine at a restaurant on-premises and sell wine for off-premises consumption (cellar door sales).


10.2 Classification of licences by level of risk of alcohol-related harm

Section 5(3) of the Sale and Supply of Alcohol (Fees) Regulations 2013 classifies licensed premises by their level of risk of alcohol-related harm. This classification uses a weighting process involving three factors: 1) the type of premises, 2) their latest trading time, and 3) the number of enforcement actions taken against the licensee.

Examples of the risk weightings by type of premises are listed in the table below:

Table 12: Risk weighting by type of premise

Type of licence	Type of premises	Weighting
Off-licence	Winery cellar doors	2
Club	Class 3 clubs (small clubs with less than 250 members like bowling clubs, golf clubs, bridge clubs, and small RSAs)	2
On-licence	BYO restaurants, theatres, cinemas, winery cellar doors	2
Club licence	Class 2 clubs (medium clubs with 250 to 999 members not operating like a tavern)	5
On-licence	Class 3 restaurants (with no separate bar area)	5
Club	Class 1 clubs (large clubs with 1,000 or more members operating like a tavern)	10
Off-licence	Hotels, taverns	10
On-licence	Class 2 restaurants (with a separate bar but not operating like a tavern), hotels, function centres	10
On-licence	Class 1 restaurants (with a separate bar area, serving alcohol without meals, operating like a tavern), night clubs, taverns, adult premises	15
Off-licence	Supermarkets, grocery stores, bottle stores	15



If the Council decides to develop a LAP, potentially this classification could help guide policy interventions applying to different types of premises.

10.3 Number of licences in the Far North

As of January 2024, there were 263 licences in the Far North issued for 241 premises:

- 127 on-licences (61 restaurants, 29 taverns, 21 hotels, 11 conveyances e.g. marine vessels, 6 other)
- 85 off-licences (20 grocery stores, 15 liquor stores, 13 cellar doors, 11 taverns, 9 hotels, 6 supermarkets, 6 remote licences, 5 other)
- 51 club licences.

In 2023, 134 special licences were issued.

Licence applications are only occasionally refused; for example, 2 licence applications were refused in the year ending June 2023 and none in the year ending June 2022.

Licence numbers show little change over the last six years, but are 18% lower than in 2008

Over the six years from 2019 to 2024, licence numbers were fairly constant, as shown in the table below.

However, licence numbers in 2024 (263 licences) are 18% lower than in 2008 (320 licences).

Table 13: Number of licensed premises in the Far North 2019 to 2024 (with 2008 for comparison)

Type of licence	2008 (June)	2019 (June)	2020 (June)	2021 (June)	2022 (June)	2023 (June)	2024 (January)
Club	62	53	50	50	49	51	51
Off-licence	99	86	82	83	80	84	85
On-licence	159	131	128	129	122	122	127
Total	320	270	260	262	251	257	263

10.4 Location of licences in the district

In January 2024, 40 different towns in the district had alcohol licences, as shown in the table below.

Table 14: Alcohol licence numbers by location, January 2024

Paihia	45	Six towns account for 60% of all licences.
Kerikeri	43	
Russell	27	
Kaitiāia	21	
Ōpua	13	
Mangōnui	10	
Kaikohe	9	
Kāeo	7	
Kawakawa	7	
Taipā	5	
Ahipara Matauri Bay Ōkaihau Ōpononi Pukenui Rāwene Waipapa Waitangi	4	
Awanui Coopers Beach Houhora Kohukohu Moerewa Ōhaeawai Ōmāpere Waimamaku Waipapakauri Whatuwhiwhi	3	
Panguru Tōwai	2	
Broadwood Herekino Horeke Karikari Peninsula Ōtaua Ōtiria Pawarenga Te Kao Urupukapuka Island Whangaroa	1	

10.5 Licence density⁹⁰ and licencing Zones

Licence density in the district

In January 2024 there was 1 licence for every 219 adults aged 15 or more living in the district, more densely concentrated than the national average of 1 licence per 373 resident adults aged 15 or more.

Evidence of harms from densely concentrated licensed premises

New Zealand studies show that a higher density of alcohol outlets is associated with increased consumption of alcohol and heightened levels of alcohol-related harms.

A 2008 study by Huckle et al⁹¹ reported that alcohol outlet density was a significant factor in excessive alcohol consumption among teenagers in Auckland.

A 2009 Waikato University study in Manukau City⁹² found that:

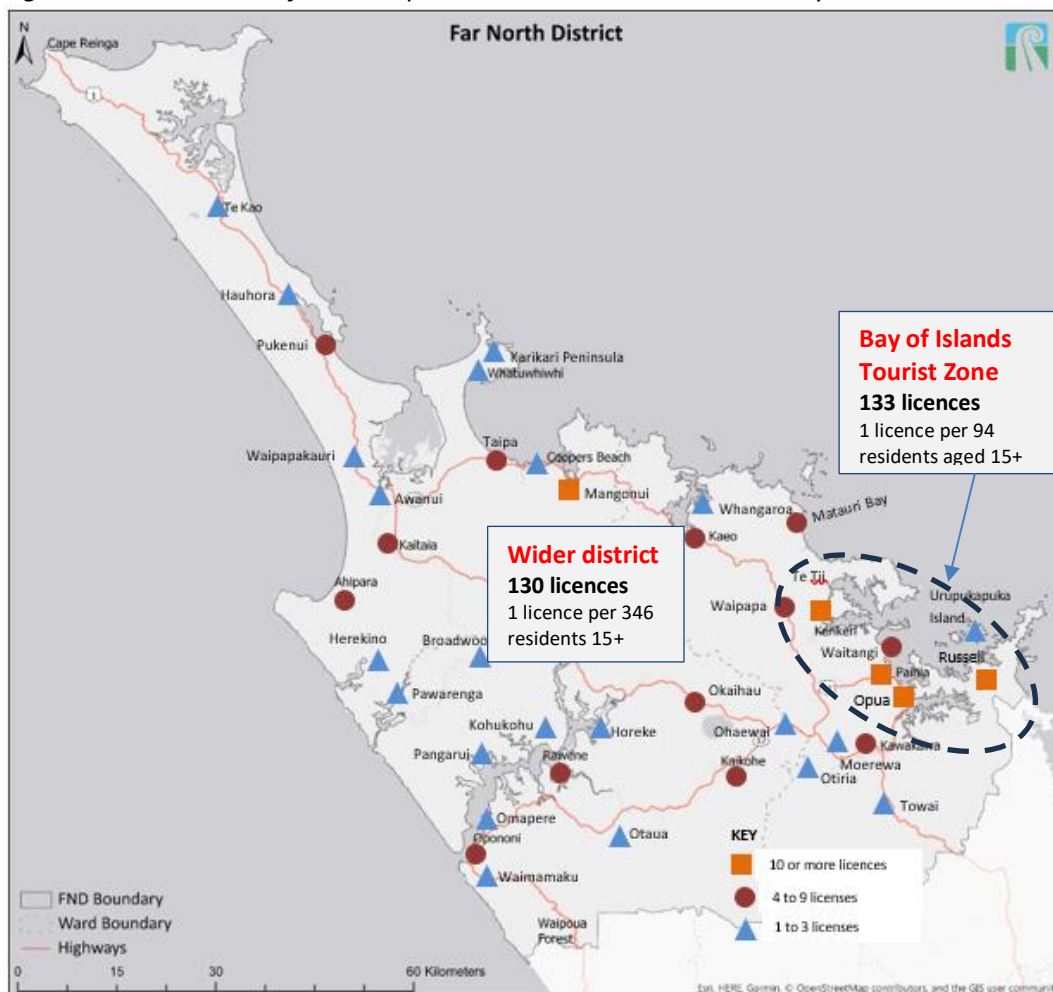
- higher outlet density led to longer trading hours and lower alcohol prices
- this was associated with increased anti-social behaviour, various offenses, and traffic accidents
- each additional off-licence resulted in an extra 60-65 police incidents per year, while an extra club or bar led to an extra 98-101 more incidents.

A 2009 study⁹³ of alcohol outlets in New Zealand, found a statistically significant association between the density of off-licences, bars and clubs and the prevalence of binge drinking. The authors reported “a 4% increase in binge drinking associated with each extra off-licence within 1km of home”. Another study showed that club licence density in New Zealand is significantly associated with higher levels of violence and a range of alcohol-related offences⁹⁴. Further analysis showed that the level of violence associated with licensed clubs is greater in areas with low populations (e.g. rural areas and small towns)⁹⁵ i.e. areas similar to the Far North.

Distribution of licences in the district

The following map shows the distribution of these licences and identifies two different licencing Zones.

Figure 18: Distribution of licensed premises in the Far North – January 2024



The Bay of Islands Tourist Zone

As the above map shows, the greatest geographic concentration of licences is in the Bay of Islands Tourist Zone in the towns of Kerikeri, Waipapa, Pahiā, Ōpua, Russell, and Urupukapuka Island, with 133 licences for an estimated 12,570 usually resident adults aged 15 or more⁹⁶ in 2023. This represents 1 alcohol licence for every 94 residents aged 15 or more, more than double the concentration for the total district (1:219 residents aged 15+).

This Zone is characterised by:

- higher incomes and less social deprivation than other areas in the district
- a relatively low proportion of Māori residents – 21% compared with 46% for the whole district from 2018 Census results
- fewer young people – 30% of residents are aged 0-29 years compared with 37% across the district
- attracting many tourists and holiday makers including those from cruise ships – as noted in the Taitokerau Destination Management Plan⁹⁷ “the majority of visitor nights to Northland are in the Bay of Islands driven by the concentration of key attractions in this area”. Given the number of visitors and holidaymakers that visit this Zone, the density of licences per resident is not a good way of assessing whether this Zone is over-saturated with licences (see discussion in section 10.4).

The Wider District

By contrast, there are 130 licences in the Wider District for 45,030 adults aged 15 or more in 2023, representing a much sparser concentration (1:346 adults – slightly more concentrated than the national average of 1:373). Here licences are spread across 33 different towns and townships. This Zone has the following characteristics:

- higher social deprivation levels and lower incomes than the Bay of Islands Tourist Zone
- a higher proportion of Māori residents – 55% from the 2018 Census
- a younger age profile – 39% of residents are aged 0-29 years
- much lower tourist and holidaymaker numbers than the Tourist Zone. This suggests that assessing the density of these licences based on the number of licences per resident is more appropriate in this Zone than in the Bay of Islands Tourist Zone.

Types of licences in each Zone

As the next table shows, the Bay of Islands Tourist Zone has a relatively high proportion of on-licences, whereas the Wider District has relatively more Clubs and Off-licences.

Table 15: Types of Alcohol Licences by Zone, January 2024

Type of licence	Bay of Islands Tourist Zone		Wider District	
	Number of licences	%	Number of licences	%
Club	11	8%	40	31% ↑
Off-licence	38	29%	47	36% ↑
On-licence	84	63% ↑	43	33%
Total	133	100%	130	100%

10.6 Trading hours

The following charts show the hours that each type of licence is permitted to trade. Note that the hours permitted may not be the actual operating hours of a venue. This is because they may decide to open later/close earlier depending on staffing and seasonal demand, etc. NB. A licence may state different opening/closing times for different days of the week e.g. 9am to 9pm on weekdays and 8am to 1am on weekends. In this case the longer opening hours are counted in these charts.

Cont'd

Off-licences

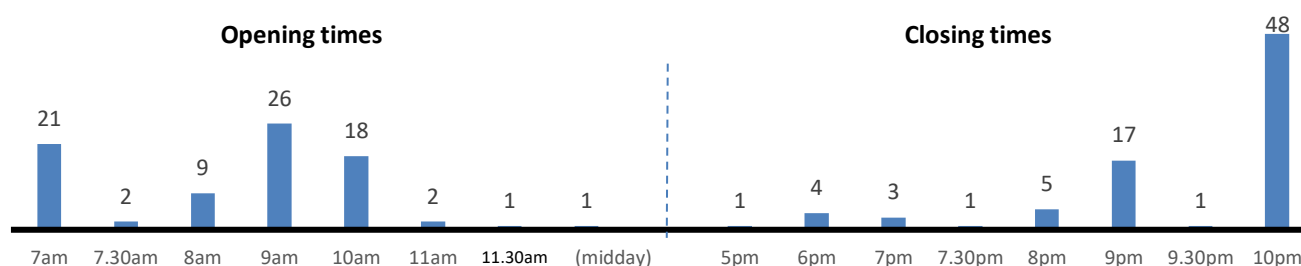
Default trading hours

In the absence of a Local Alcohol Policy, the Act sets out default maximum trading hours for off-licences of 7am to 11pm on the same day.

Permitted trading hours stated in licences

The most common permitted opening times for off-licences in the Far North are 7am, 9am and 10am, while the most common closing times are 9pm and 10pm. Note that no licences permit closing times later than 10pm. Excluding five off-licence premises with Remote licences allowing them to sell alcohol online 24x7, the chart shows the range of permitted opening and closing hours for 80 off-licence premises.

Figure 19: Permitted opening and closing times for off-licences



Actual trading hours

In practice, many off-licence premises open later and close earlier than permitted. For example, for 22 groceries, supermarkets, and liquor stores permitted to stay open till 10pm on Saturdays, their average actual closing time on Saturdays in September 2024 was 8.20pm, with only 2 of these premises (Countdown Kerikeri and Kiwi Liquor Paihia) staying open till 10pm.

On-licences

Default trading hours

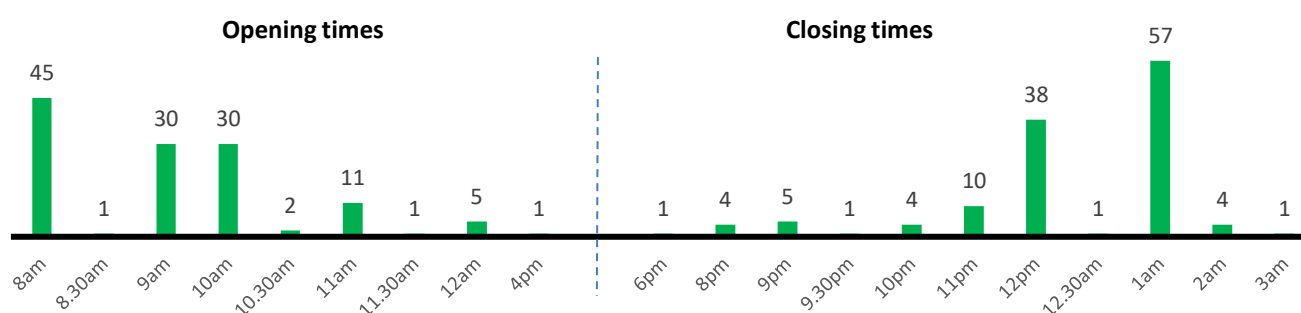
The default maximum trading hours for on-licences set by the Act are 8am to 4am the next day.

Permitted trading hours stated in licences

The following chart shows the range of permitted opening and closing hours for 126 on-licence premises. NB. One premise was excluded from the analysis (a motel with a licence to operate a mini bar service 24x7).

The most common permitted opening times for on-licences are 8am, 9am and 10am, while the most common closing times are 12pm (midnight) and 1am the next day. Note that only five premises are allowed to close later than 1am, and no premises have closing times of 4am (the latest default closing time stated in the Act).

Figure 20: Permitted opening and closing times for on-licences



Actual trading hours

Hotels, restaurants etc. permitted to close at 1am or later, either close much earlier or have no fixed closing time. Premises with no fixed closing time typically stay open while patrons are present but stop serving alcohol at their latest permitted trading time for alcohol.

Taverns that are permitted to close at 1am, generally stay open till 1am.

Club licences

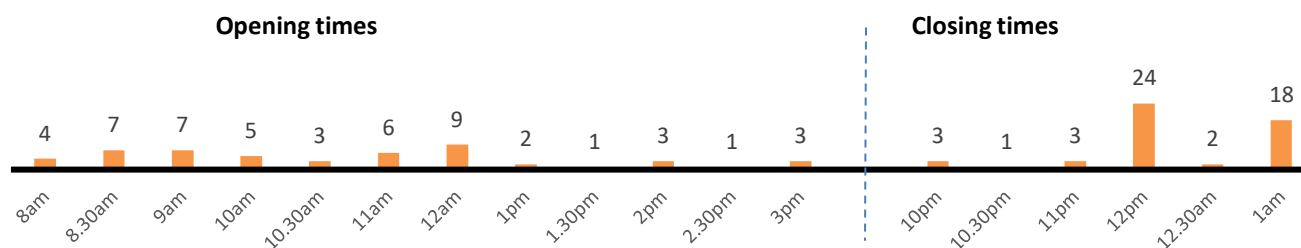
Default trading hours

Clubs have the same default maximum trading hours as on-licences i.e. 8am to 4am the next day. The following chart shows the range of opening and closing hours permitted for the 51 clubs in the district.

Permitted trading hours stated in licences

Opening times are quite varied with the most common permitted time being 12am (midday). The most common permitted closing times are 12pm (midnight) and 1am (with no clubs permitted to trade after 1am). There is considerable variability in the permitted trading hours.

Figure 21: Permitted opening and closing times for clubs



Special licences

In general, special licences are issued for evening events from around 5pm until 12pm (midnight) or 1 am.

11 Possible elements of a LAP

Section 77 of the Act lists seven elements related to alcohol licencing that may be included in a LAP and these elements are discussed below. This discussion makes no conclusions as to whether these elements should be covered in a LAP for the district. Engagement with the community is required, including a survey investigating local attitudes to these matters, before any recommendations can be made re including these matters in a LAP or not. Rather, this section of the report is intended to provide an overview of what could be covered in a LAP.

Supply controls

In general, the matters that can be covered in a LAP are supply controls. Babor et al⁹⁸ referred to supply controls as follows: *“when alcohol is readily available, consumption and associated problems increase, whereas they decrease when restrictions are placed on availability”*. Supply controls include restricting the hours of trading and/or the location and density of alcohol outlets. Babor et al stated that the evidence internationally suggests that supply controls can be effective in helping reduce alcohol-related problems: *“Research shows that the density of alcohol sales outlets and drinking establishments ... are generally correlated with levels of alcohol-related problems, and restrictions on density and times of sale are therefore likely to be an effective antidote to intoxication, injuries, and violence because they reduce the attractiveness and convenience of heavy drinking”*.

11.1 Location of licensed premises by reference to broad areas

Through a LAP the Council may state policies applying to licensed premises by reference to broad area/s (section 77(1)(a) of the Act). These broad areas are not defined in the Act but could include commercial, special purpose zones, or entertainment areas, etc. In deciding on these broad areas, the Council must have regard to the objectives and policies of the District Plan (section 78(2)(a)).

Broad area/s that could be referenced in a LAP

From the above report, possible broad areas that could be referenced in a LAP for the Far North include:

1. District Plan zones
2. areas with high deprivation vs. low deprivation (see section 5.3)
3. licencing zones - the Bay of Islands Tourist Zone vs. the Wider District (see section 10.4)
4. areas where the population includes relatively high proportions of vulnerable groups (see section 9.2)
5. areas with high levels of hospital admissions wholly or partly attributable to alcohol (see section 9.3)
6. areas with a high level of driving under the influence (see section 9.6)
7. areas with high levels of alcohol-related family/whānau violence incidents reported to the Police (see section 9.10).

Pros and cons of referencing broad area/s within the district in a LAP include:

Pros	Cons
<p>Policies can be tailored to address specific issues and risks in different areas, potentially leading to more effective interventions</p> <p>Can help address alcohol-related harm in areas with higher vulnerability or deprivation</p> <p>Allows for policies that reflect the unique needs and characteristics of different broad communities</p> <p>Uses available statistics to inform policy</p>	<p>Differing rules could affect businesses unequally, potentially leading to economic disparities between areas</p> <p>Stricter policies in certain areas might be perceived as unfair or discriminatory, especially if they align with socioeconomic or ethnic divides</p> <p>Stricter rules in one area might lead to the public travelling to neighbouring areas with less stringent rules.</p>

How other local councils have addressed broad areas in their LAPs

Several LAPs have provisions that restrict licensed premises to particular zones or “broad areas”, with exceptions allowed if a resource consent has been granted or existing use rights exist. These LAPs have generally restricted licensed premises (or categories of licensed premises) to business, commercial zones, or industrial zones. Examples include LAPs in the following areas: Wairarapa, Central Hawke’s Bay, Horowhenua, Matamata-Piako, New Plymouth and Stratford joint LAP, Selwyn, Tasman, Waikato, Waimakariri, Waipā, and Waitomo.

Local situation

Any LAP provisions referencing zones in the District Plan would need to reference the District Plan. This is discussed in section 4.4, with examples of District Plan Objectives and Policies included in Appendix One. NB. Under the Act, a LAP can be more restrictive than the District Plan but cannot override District Plan provisions. If Council agrees that a LAP should be developed, investigation of zoning options will require input from the District Plan team.

Possible LAP provisions referencing other broad areas such as areas with high deprivation vs. low deprivation will be considered during LAP development if Council agrees that a LAP should be made.

11.2 Location of licensed premises by proximity to premises of a particular kind or kinds

Section 77(1)(b) of the Act states that the Council may include policies in a LAP referencing the location of licensed premises compared with other licensed premises of a particular kind or kinds. Proximity to other premises is an issue that is discussed in section 10.4 relating to the density of licensed premises, with the evidence indicating that proliferation of premises in an area is associated with a range of harms including excessive alcohol consumption and an increased level of criminal offences (including common assault and sexual assaults), anti-social behaviour and traffic accidents. In addition, section 9.8 discusses the potential for alcohol outlets to negatively affect the amenity and good order of neighbourhoods. The level of restrictions applied to various kinds of premises could reflect the level of risk assigned to different types of premises in section 5(3) of the Sale and Supply of Alcohol (Fees) Regulations 2013 (see section 10.2).

Pros and cons of limiting the location of new premises by proximity to other premises:

Pros	Cons
<p>Helps manage the density of alcohol outlets, which research has linked to higher levels of alcohol-related harms</p> <p>Will decrease overall alcohol availability in specific areas, potentially leading to reduced consumption and related harms</p> <p>Can help maintain the desired amenity and good order of neighbourhoods by preventing oversaturation of alcohol outlets</p> <p>Will protect established outlets from excessive competition, potentially supporting local businesses</p>	<p>May lead to higher prices due to less competition and potentially increase the financial burden on consumers</p>

How other local councils have addressed the density of licensed premises in their LAPs

Some councils have included mandatory provisions ensuring that no new off-licences are within a stated distance from another licensed premises. Others have stated that the DLC will “have regard to” the proximity of other licences where relevant.

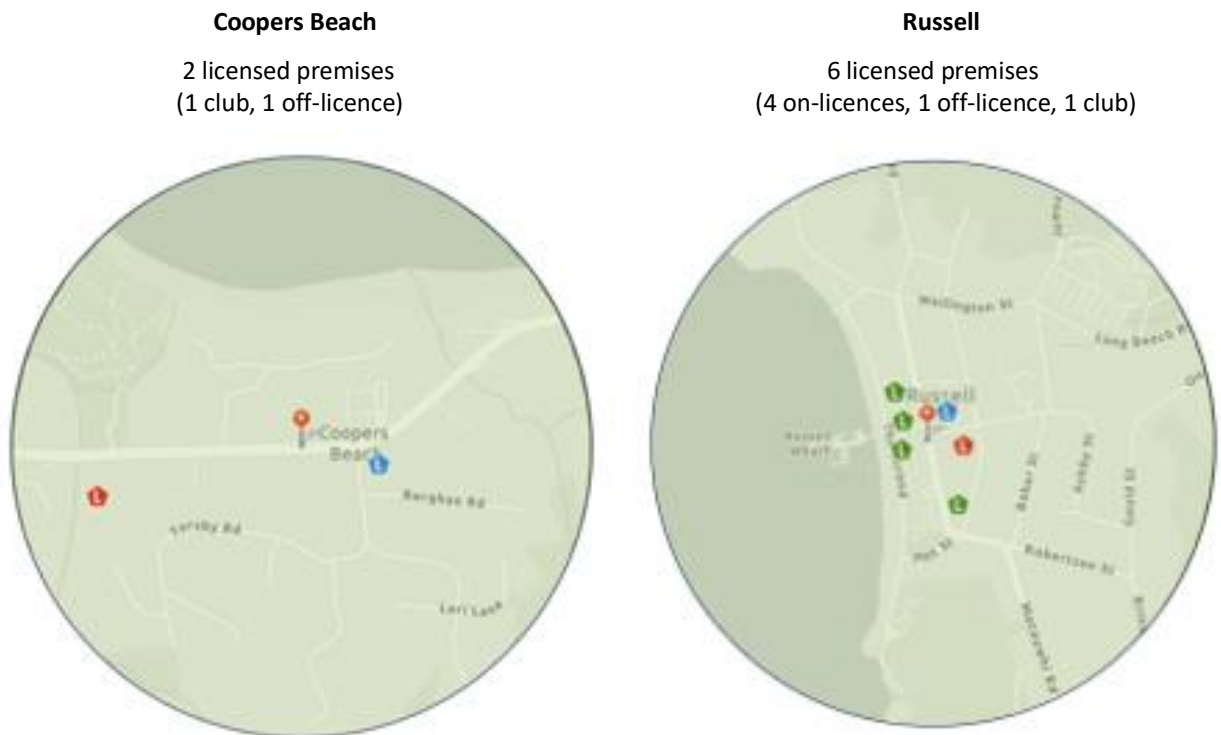
For example, Waikato District’s LAP contains the following:

- 4.3.2. *No new on-licence for a new tavern, not being located in an area zoned under the Waikato District Plan to allow commercial activities, shall be located within five (5) kilometres of any existing tavern or hotel that holds an on-licence.*
- 5.3.2 *No new off-licence in respect of a bottle store shall be issued for any premises located within one (1) kilometre of the legal site boundary of any existing bottle store, licensed supermarket or grocery store.*

The local situation

As previously noted, (see section 10.4), while the district has a higher density of licences than New Zealand as a whole, this density varies markedly across the district, with the Bay of Islands Tourist Zone having a higher density and the Wider District having a lower density. Therefore, applying a “one size suits all” policy regarding the density of outlets across the district is probably unreasonable. This is illustrated in the following maps showing the density of licensed premises in two towns, one in the Bay of Islands Tourist Zone and the other in the Wider District:

Figure 22: Licensed premises in a 500-metre radius for two different towns in the Far North



In summary

There is considerable New Zealand evidence of the harms associated with a higher density of licensed premises (see section 10.4).

For specific licence applications in individual towns, the DLC already considers the density of outlets and the harm this may cause. For example, the Fresh Beer Ltd application in Waipapa for a liquor store on the BP service station site was rejected in 2022, in part because there were four other off-licence outlets already existing within 850 metres of the service station.

A LAP for the Far North could follow the example of other local councils and formally specify how far away new licences must be from licensed premises of a similar type.

11.3 Whether further licences should be issued for premises in the district

Section 77(1)(d) of the Act states that a LAP may include policies to address whether further licences (of particular kind or kinds) should be issued for premises in the district (or any part of the district). These policies are similar to limiting the location of licensed premises in proximity to other premises as discussed in the section above. For example, the Council could specify in a LAP that in view of the harms associated with excessive and inappropriate alcohol consumption, no further licences will be issued across the district or in specified towns or broader geographical areas. Alternatively, the Council could set a cap on the total number of licences or apply a sinking lid approach as for Class 4 gaming machines in the *Class 4 Gaming and TAB Venue Policy*⁹⁹. The Council could apply this policy just to one type of licence e.g. to on-licences in general or to particular types of on-licences such as hotels and taverns. Again, any restriction may relate to the level of risk for different types of premises (see section 10.2).

An approach recommended by Alcohol Healthwatch is a district-wide cap on more licensed premises, with a localised sinking lid option for high-risk areas or towns (i.e. those areas that have high numbers of alcohol outlets already and/or large proportions of vulnerable populations such as young people, Māori and low-income households).

Pros and cons of limiting the issue of further licences in a LAP

Pros	Cons
Potentially reduces alcohol-related harm by limiting the availability of alcohol	May limit business opportunities and potential job creation in certain areas or across the district
Addresses concerns of communities that are experiencing high levels of alcohol-related harm	May lead to higher prices due to less competition
Can be tailored to specific areas or types of outlets based on local needs, potentially leading to more effective policy interventions	Could make alcohol less accessible for responsible consumers in some areas or across the district
May protect established outlets from excessive competition	

How other local councils have addressed limiting the issue of further licences in their LAPs

Some Councils have limited new liquor stores across their whole district. For example, the New Plymouth-Stratford LAP states:

The maximum number of off-licence bottle stores permitted for each district shall be the number of off-licensed bottle stores at the time this policy is adopted.

Other Councils such as Hutt City Council and Waikato District Council have put in place limits on off-licence numbers in individual towns or suburbs. e.g. Hutt City has set limits for Hutt Central (11 off-licences), Wainuiomata (six), Naenae (four), Stokes Valley (three), Taitā (three), and Avalon (one).

LAP restrictions by other local councils heavily focus on liquor stores, with a general lack of these restrictions applying to supermarkets and grocery stores. Some LAPs allow new off-licences to be granted in certain cases, namely, if a business is relocating (Horowhenua) or if it can be demonstrated that the business will take active steps to minimise harm (New Plymouth-Stratford).

Local situation

Some Far North towns currently have a very high density of licences per resident population. This may be justified in the Bay of Islands Tourist Zone where licensed premises serve both the resident population and the tourist market. However, in small townships that mainly serve the local community limiting the issue of further licences of particular type/s in individual towns via a cap on licence numbers and/or a sinking lid approach could help reduce alcohol-related harms. Such an approach could also benefit existing business by limiting competition. However, it will be up to individual communities to provide their views on such limitations.

11.4 Location of licensed premises by proximity to facilities of a particular kind or kinds

Section 77(1)(c) of the Act states that the Council may include policies in a LAP referencing the proximity of licensed premises to facilities of a particular kind or kinds. These facilities are not defined in the Act. However, other councils have focused on the proximity of licensed premises to 'sensitive facilities' or 'sensitive sites' such as educational facilities, addiction treatment facilities and hospitals, marae, places of worship, and gathering places for families such as playgrounds, parks and reserves and other community facilities.

Pros and cons of referencing proximity of licensed premises to 'sensitive sites' in a LAP:

Pros	Cons
Reduces exposure to alcohol marketing and availability for vulnerable groups, particularly youth	May limit business opportunities and potential job creation in certain areas
Shows respect for culturally significant sites such as marae and places of worship	Could make alcohol less accessible for responsible adult consumers in some areas
May reduce the temptation to purchase alcohol by those being treated for alcohol addiction	Rules specifying distances of new outlets from sensitive sites could be impractical to apply in small towns.
May align with community desires to keep certain areas 'alcohol-free' or with few alcohol outlets to preserve or protect good order and local amenity values	

How other local councils have addressed proximity to sensitive sites in their LAPs

Other councils have used community consultation to determine local 'sensitive sites', the vulnerability of users of those facilities, and reasonable distances licensed premises should be from these sites. Applying these rules needs to be mindful of existing use rights and typically any restrictions will apply only to new licences.

As of April 2024, 28 local councils out of 41 with LAPs included provisions restricting the proximity of licensed premises to 'sensitive sites':

- all 28 of these LAPs included places catering to children, including educational facilities (primary and secondary schools/kura kaupapa, pre-school/kōhanga reo/early childhood education centres), childcare facilities and Well Child/Tamariki Ora provider centres, as well as playgrounds, parks, carparks, reserves, and recreational facilities
- 12 LAPs included places of worship, religious gathering/assembly and spiritual facilities, including urupa and cemeteries
- 6 LAPs included healthcare facilities such as alcohol and drug treatment centres, hospitals and medical centres
- 5 LAPs included marae.

These LAPs often specify the types of premises that should not be in proximity to these 'sensitive sites' such as hotels, taverns, bars, night-clubs, and bottle stores. In general, restaurants, wineries, supermarkets, grocery stores, and clubs are excluded from these provisions.

Cont'd

Local situation

Proximity of licensed premises to 'sensitive facilities' varies from town to town. Two examples are provided below:

Figure 23: 'Sensitive facilities' within 500-metres of off-licences

Proximity to Super Liquor, Kaitiāia

- 6 places of worship
- 6 early childhood centres
- 1 school



Proximity to The Shed, Kaikohe

- 4 places of worship
- 2 early childhood centres
- 3 playgrounds/sports facilities
- 1 school



Arguably, The Shed in Kaikohe with its very close proximity to a playground is not in an ideal location. By contrast, Super Liquor in Kaitiāia is close to a church located half a block away, but Super Liquor is not directly visible to the church, so this is probably more acceptable. However, having six early childhood centres and one school within 500 metres of Super Liquor is not ideal.

NB. The two maps above are from a mapping tool being developed by GIS staff at the Council. This tool, or similar, can easily identify and evaluate the location of proposed new licensed premises in relation to 'sensitive sites' within a set radius.

In summary

There are strong arguments for protecting 'sensitive' sites in a LAP. Deciding to include LAP provisions regarding 'sensitive sites', identifying sites of concern, and determining the content of these provisions will require community input and the advice of key stakeholders (the Police, Medical Officer of Health, and Licencing Inspectors).

11.5 Setting maximum trading hours in a LAP

Section 77(1)(e) of the Act allows local authorities to include trading hour policies in a LAP. Instead of the default national maximum trading hours (8 am to 4 am for on-licences and club licences; 7 am to 11 pm for off-licences), trading hours can be set to suit district and community needs (section 45). The trading hours stated in a LAP can be more, or less, restrictive than the default hours in the Act. Trading hours can be set at the community level or apply district-wide. NB. If reduced hours are applied in one geographical area, this may have the perverse effect of encouraging people to drive to another area where the reduced hours do not apply.

Both new and existing licences must follow the hours specified in a LAP, but any changes only take effect three months after the LAP adoption notice (section 90(6)). The DLC or ARLA can set more restrictive hours for a particular licence than those in the Act or a LAP but must have regard to the hours stated in the LAP.

Permitted trading hours do not apply to:

- hotel mini bars (section 46 of the Act)
- remote (online) sales, except for delivery between 11 pm and 6 am (sections 48 and 59) and on Anzac Day morning, Good Friday, Easter Sunday, and Christmas Day

Strong general evidence that reducing trading hours helps minimise alcohol-related harm

Babor et al (2023) stated “...there is strong and reasonably consistent evidence from a number of countries that changes to hours or days of trade have significant impacts on the volume of alcohol consumed and on the rates of alcohol-related problems”¹⁰⁰. The authors point out that restrictions on hours of sale for alcohol usually focus on reducing availability late at night. This can be for off-licence sales where the aim is to reduce convenient purchasing for people already having a drinking session, or for on-licence sales where reductions in late-night problems in entertainment zones are the usual goal.

When 24-hour trading ended in New Zealand in 2012, the reduction in very late-night trading hours was found to be associated with a reduction in weekend assaults resulting in hospital admission (which declined by 11%), with the greatest reduction among 15 to 29-year-olds (18%)^{101 102 103}.

Evidence for setting trading hours for different licence types

Off-licences

Alcohol Healthwatch considers that reducing trading hours for off-licences is a key strategy for reducing alcohol-related harms. They note that shorter hours can decrease people purchasing more alcohol while already intoxicated or influenced by alcohol¹⁰⁴.

New Zealand research found that the purchase of alcohol from off-licence premises after 10 pm was approximately twice as likely to be made by heavier drinkers¹⁰⁵.

Research in Switzerland showed that restricting off-premise alcohol sales after 9pm was associated with a 7% decrease in hospital admissions due to alcohol intoxication among teenagers and young adults¹⁰⁶. A similar study in Germany found that a ban on off-premise alcohol sales between 10pm and 5am led to a 7% reduction in alcohol-related hospitalizations among adolescents and young adults¹⁰⁷.

On-licences

A systematic review of international studies on trading hours at on-licence premises found that extending trading hours typically led to increases in assaults, unintentional injuries, and drink driving offences. Conversely, restricting trading hours usually resulted in decreases in assaults and hospitalisations^{108 109}.

Research in Australia on interventions in the night-time economy in Geelong and Newcastle¹¹⁰ recommended restricting on-licence trading hours to reduce alcohol-related harm. Subsequent research in Australia¹¹¹ found that for every hour a venue is open after midnight, there was a 17% increase in alcohol-related harm in the area including drink driving, assaults, and Emergency Department attendance.

A study in Western Australia¹¹² that linked drink driver crashes to drivers' last place of drinking found that small extensions of trading hours for licensed hotels significantly increased numbers of drink-driver road crashes.

The Licencing Inspector for the Whakatāne and Kawerau District noted a ruling from ARLA which imposed a 12 pm closing time on a central bar¹¹³. This had a roll-on effect of earlier closing times across all bars in the CBD. As a result, there was less crime and a significant improvement to the quality of life of the residents in the area.

Club licences

No studies were identified on the association between club trading hours and alcohol-related harm in New Zealand.

Special licences

The wide variety of events requiring special licences makes it hard to evaluate any associations between the hours of these events and alcohol-related harms. However, as mentioned by Babor et al¹¹⁴ above, the longer the trading hours, the higher the likelihood of excessive consumption, intoxication, and alcohol-related harms.

Home-delivery of alcohol

According to Babor et al¹¹⁵ there have been no formal studies on the effects that hours of alcohol home deliveries have on alcohol-related harms, although some exploratory work in New Zealand during the first New Zealand COVID-19 pandemic restrictions¹¹⁶ suggested that late-night deliveries are often linked to high-risk drinking occasions. As the Far North currently does not have delivery providers such as Deliver Easy and Uber Eats, the fast-paced delivery experienced in larger cities such as Auckland - where alcohol can sometimes be delivered within 10 minutes - is not a concern.

Note that, under section 59(1) of the Act, home deliveries cannot be between 11pm and 6am.

Pros and cons of setting trading hours for licences in a LAP

Pros	Cons
<p>Restricting late-night trading hours for on-licences can lead to decreases in alcohol-related harms such as injuries, violence, drink driving, and hospital admissions</p> <p>Restricting off-licence closing times <u>may</u> reduce pre-loading and side-loading before going out to bars or clubs. [However, the evidence for this is weak – see section 8.5]</p> <p>Setting hours locally allows for tailoring to specific community needs and characteristics</p> <p>Different hours for different licence types or areas can address specific problems while minimising the impact on responsible drinkers</p> <p>Earlier closing times may reduce policing and healthcare pressures and costs associated with alcohol-related incidents.</p>	<p>Restricted hours may reduce revenue for on-licences such as bars, clubs, and restaurants.</p> <p>Consumers might purchase larger quantities when alcohol is available from off-licences e.g. with the intention of pre-loading/side-loading later</p> <p>Inconvenience for responsible drinkers – later opening times and/or earlier closing times limit options for those who drink responsibly</p> <p>Displacement effect - more restrictive hours in one area may lead to increased travel to areas with later closing times</p>

How other local councils have addressed maximum trading hours in their LAPs

Off-licences

As of April 2024, most LAPs have restricted closing hours for off-licences, with only five having the maximum default closing time of 11 pm.

Only seven LAPs (out of 41 LAPs examined in April 2024) have later opening hours for off-licences than the default time in the Act of 8am (typically 9am).

Although studies have found that supermarkets/grocery stores and other off-licences (e.g. bottle stores) cause a similar amount of alcohol-related harm¹¹⁷, supermarkets and grocery stores have been treated more leniently in several LAPs. For example, in Napier-Hastings and the Ruapehu district supermarkets and grocery stores may sell alcohol two hours earlier than other off-licence premises (7am vs. 9am).

On-licences and clubs

Most local councils with LAPs have imposed shorter on-licence and club trading hours than the default time of 4am in the Act, with closing times usually one or two hours before this. The exception is Dunedin City with a maximum default closing time of 4am for entertainment premises in non-residential areas (but with a 2:30am one-way door restriction). However, almost all LAPs have made no changes to the default opening time of 8am in the Act.

Also, it is common for LAPs to apply reduced closing times where premises are close to residential areas, and these may be mandatory or discretionary conditions for the DLC to impose.

A distinction between premises is also typical, for example, taverns may be permitted later closing hours than restaurants and cafés.

Notably, the Hutt City LAP provides for a probationary period for new on-licence premises in certain locations. New taverns, hotels, nightclubs, and function centres in these areas, must close at 1am for one year, but after this time may extend their licences to 3am closing if they meet all the 'suitability criteria' in section 105 of the Act.

Club licences

Nearly all LAPs have restricted closing hours for clubs.

Most LAPs have the default opening time of 8am for clubs, but six permit the earlier time of 7am, with eight including an earlier opening time on Anzac Day (4am, 5am or 6am).

Special licences

Many LAPs across New Zealand require hours for special licences to be no greater than the underlying licence.

Most LAPs do not include set hours for special licences in their LAPs and have either not mentioned hours for these licences (11 districts) or have noted that decisions are discretionary or on a case-by-case basis (14 districts). Fourteen LAPs state mandatory maximum hours, with three stating that hours may be set under the general discretionary conditions in the LAP. Three LAPs require that hours are the same as any existing licence

(on-licence or club licence).

Local situation

Opening and closing times permitted in licences in the district are analysed in section 10.5. In summary, the most common permitted opening and closing times for licences in the Far North are

- **off-licences:** opening times of 7am, 9am and 10am, with closing times of 9pm and 10pm. Note that no off-licences are permitted to close times later than 10pm
- **on-licences:** opening times of 8am, 9am and 10am, with closing times of 12pm (midnight) and 1am the next day. Note that only five premises are allowed to close later than 1am, and no premises have closing times of 4am (the maximum default closing time stated in the Act)
- **club licences:** opening times are quite varied with the most common permitted time being 12am (midday). The most common permitted closing times are 12pm (midnight) and 1am (with no clubs permitted to trade after 1am). There is considerable variation in permitted club trading hours. Potentially a LAP could suggest similar maximum opening hours for all clubs unless there are extenuating circumstances to increase or decrease these hours.

Unofficial ‘default permitted closing times’ in the district for on-licences and clubs of 12pm (midnight) or 1am, are 3 to 4 hours earlier than the maximum default time allowed in the Act of 4am. In the absence of a LAP, this has been driven by statutory agencies (Police, Medical Officer of Health and Inspectors) to applications for later closing times – this may be via formal objections to the DLC or through informal conversations with applicants letting them know that the agencies will object to closing times later than 1am. This situation was described by a hotel owner who said *“It’s frustrating knowing that a big driver for the 1am closing time in the Bay of Islands is the police roster and lack of night-time cover. The move to 1am closing has affected the Bay of Islands attraction to young people. There are less and less young people coming to the Bay of Islands. If on-licences are three hours earlier closing than the national default, why is the default for off-licences not 8pm?”*

Setting maximum permitted closing times in a LAP should be mindful that actual hours of closing are often earlier than permitted, no doubt reflecting commercial circumstances. For instance, several restaurants are permitted to sell alcohol up to 1am, but actually close at 8pm or 9pm at the latest.

A LAP could allow earlier opening hours for specific clubs (e.g. RSAs) on Anzac Day.

11.6 Including one-way door policies in a LAP

One-way door restrictions impose a condition on a licence that allows patrons to leave places such as bars, taverns, pubs, and nightclubs but not enter or re-enter after a certain time¹¹⁸. These restrictions aim to prevent large crowds from exiting licensed premises simultaneously and are intended to minimise the potential for intoxicated patrons to migrate between venues or interact with others, to decrease the likelihood of disorder and crime. Exempt persons include the licensee, staff, family, lodgers and tenants in the premises and their guests.

In 2010, the Law Commission recommended mandatory one-way door policies for all on-licences and club licences open after 2am¹¹⁹. While the Act did not adopt this recommendation, it allows for one-way door policies to be included in a LAP under section 77(1)(g). These restrictions can apply to on-licences across the entire district or specific areas, like entertainment precincts. Under section 50 if a LAP contains a one-way door restriction, then the holder of an on-licence or club licence must comply with this provision in the LAP. According to section 90(6), any new or modified one-way door policy in the LAP takes effect three months after the public notice of its adoption.

The DLC or ARLA may also impose a one-way door restriction as a licence condition for a new or renewed on-licence or club licence independently of a LAP.

The evidence

The use of these restrictions is mostly found in Australia, Canada, and New Zealand. Some Australian cities and States have implemented one-way door policies for over a decade¹²⁰, and these restrictions were also trialled in some regions in New Zealand, such as central Christchurch (2007)¹²¹, Dunedin (2008)¹²² and Whangārei (2015)¹²³.

Research studies in New Zealand and Australia^{124 125 126} report mixed results for one-way door restrictions:

- in six areas, these restrictions have led to decreases in assaults both outside and inside licensed premises (with declines of around 10%)
- however, two studies reported an increase in assaults and three studies showed no difference.

Pros and cons of including one-way door policies in a LAP

Pros	Cons
<p>Encourages a more gradual exodus from venues, reducing the concentration of people on the streets at closing time</p> <p>Can help staff manage patron numbers and intoxication levels more effectively</p> <p>May lead to decreased overall drinking as it is harder for patrons to venue-hop late at night</p> <p>May be an appropriate approach in the Bay of Islands Tourist Zone which has a reputation for disorderly behaviour by patrons as they exit on-licences and move between venues</p> <p>May be a useful approach for managing large events where special licences are required</p>	<p>May lead to reduced revenue for venues, especially those that typically attract late-night crowds.</p> <p>Restricts freedom of movement and socialising options for responsible drinkers</p> <p>Unlikely to apply in smaller towns and townships in the district with only one on-licence and no opportunity for patrons to venue-hop late at night</p>

How other local councils have included one-way door restrictions in their LAPs

Discretionary conditions

Over 30 out of 41 LAPs studied in April 2024 have included one-way door provisions as discretionary conditions that are up to the DLC or ARLA to apply for particular licences. These conditions mainly apply to on-licences and special licences, while around half also apply to clubs. The New Plymouth/Stratford LAP has a typical provision: *“One way door restrictions are not a mandatory requirement for on-licences, but may be imposed on a licence, as the District Licencing Committee requires”*.

Mandatory restrictions

In April 2024, seven LAPs (covering 12 local council areas) have mandatory one-way door policies.

Timing and geographical restrictions

Typically, these restrictions come into effect one hour before closing. Mostly these restrictions apply every day of the week. In most cases these restrictions cover on-licences and clubs across the whole district.

Local situation

Feedback from a range of sources indicates the following:

- in the Bay of Islands Tourist Zone, crowds of unruly patrons leaving on-licences can be an issue (especially in Paihia) and one-way door restrictions may have a part to play, and, subject to community feedback, could be mandatory in this Zone
- in the Wider District, there is little need for ‘crowd control’ of people leaving pubs and bars, as they typically go home or go to a party when the pub closes
- one-way door restrictions are likely to help manage people leaving large special events where alcohol is available
- having discretionary conditions that are up to the DLC to impose may work well in the district.

11.7 Issuing licences subject to discretionary conditions

Under section 77(1)(f) of the Act, Council can include suggested discretionary conditions in a LAP and the DLC and ARLA must have regard to these suggested conditions in their licencing decisions. The Act does not specify what these conditions may cover. Matters that could be included as discretionary conditions in a LAP are described below. Other matters could arise from community feedback if Council decides that a LAP should be developed.

11.7.1 Banning single-unit sales

The evidence

Studies show that alcohol-related harm increases where alcohol is easily accessible, and this includes where impulsive alcohol purchases are encouraged, and where the price is affordable¹²⁷.

Purchasing single cans or bottles of beer, cider or RTDs (single sales) is more affordable than the cost of a pack¹²⁸. This practice is likely to be favoured by:

- those who are looking to consume alcohol immediately (typically in public)
- adolescents or young adults with low incomes
- heavy drinkers
- those who are dependent on alcohol.

Research in the USA investigated the association between single sales and alcohol-related violence and crime¹²⁹, and found that interventions to reduce single sales reduced rates of alcohol-related ambulance attendances among 15 to 24-year-olds¹³⁰.

Restrictions on single sales can also assist compliance with alcohol control bylaws applying to drinking in public places.

Some off-licence retailers have argued that single sales should be allowed to recover the cost of broken packages, and that such sales meet the needs of those wishing to purchase minimum quantities such as visitors and tourists.

Pros and cons of restricting single sales in a LAP

Pros	Cons
<p>May discourage impulse purchases and excessive consumption, particularly among price-sensitive consumers and those dependent on alcohol</p> <p>May reduce pre-loading and side-loading behaviour (see section 8.5)</p> <p>Could help reduce easy access to alcohol for youth</p> <p>Could potentially reduce alcohol-related harm, especially in areas with high levels of public drinking or alcohol-related issues.</p>	<p>May reduce sales and profitability for some alcohol outlets, particularly smaller stores.</p> <p>Could inconvenience responsible drinkers (including visitors staying in the district) who prefer to purchase single units</p> <p>Potential for unintended consequences - might lead to consumers purchasing larger quantities than they initially intended (a tourist buying a six-pack rather than a single unit).</p>

How other local councils have addressed single sales

Several LAPs include discretionary conditions that the DLC may impose to restrict single sales. For example:

- (i) Gore District Council’s LAP prohibits *“single sales of beer or ready to drink spirits (RTDs) in bottles, cans, or containers of less than 440mls in volume except for craft beer and shots or pre-mixed shots”*
- (ii) Whanganui District Council’s LAP includes a discretionary condition for off-licences: *“The licensee must not break down the retail packaging of packages containing less than 445ml units of beer, cider or RTDs for sale from the licensed premises, except where the retail packaging of those alcohol products has been accidentally damaged and in which case the licensee may re-package those alcohol products for sale in packages containing no less than 4 units”*.

Local situation

Single serve sales of products other than craft beer do occur in the Far North, as witnessed in the photo on this page and referred to in the application for the renewal of the licence for a liquor store in Kaikohe. In the latter case, the DLC imposed a condition forbidding single-unit sales.



Source: Local bottle store

Banning single-unit sales of products normally sold in a 4-packs or 6-packs may be appropriate, subject to community feedback.

11.7.2 Buy Now Pay Later

The evidence

Buy Now Pay Later (BNPL) schemes (also called ‘Afterpay’ or ‘Laybuy’ or similar) are a type of short-term financing that allows consumers to make purchases and pay for them at a future date. BNPL is heavily promoted and generally less regulated compared to other financing options. It has been criticized for encouraging impulse shopping and debt by those using the scheme¹³¹. The availability of alcohol products on BNPL platforms (including online alcohol delivery) has been of particular concern, as it may enable alcohol purchases and/or trigger the desire to purchase more alcohol than planned.

Some New Zealand communities have strongly opposed BNPL schemes. For instance, in Panmure in 2022, public opposition forced the local Bottle-O store to cease offering AfterPay.

Pros and cons of restricting BNPL schemes

Pros	Cons
<p>Restricting BNPL schemes for alcohol could reduce impulse purchases and potentially excessive consumption</p> <p>Could help prevent individuals from accumulating debt due to alcohol purchases, particularly important for vulnerable groups including young adults and those from more deprived communities</p> <p>May contribute to reducing alcohol-related harm by limiting easy access to larger quantities of alcohol than people can immediately afford</p> <p>Supports the principle of responsible alcohol service by discouraging overconsumption facilitated by credit.</p>	<p>Could potentially reduce sales for alcohol retailers, especially for more expensive products or large orders</p> <p>Might be seen as an infringement on consumer freedom for responsible purchasers needing to make a large purchase of alcohol e.g. for an unplanned event.</p>

How other local councils have addressed BNPL

Waikato District Council's Provisional LAP 2022 includes a discretionary condition that its DLC may consider "whether 'buy now pay later' is an inappropriate method of payment for the sale and supply of alcohol purchased either remotely or on premises."

Local situation

BNPL is not commonly available for alcohol purchases in the Far North. However, a LAP could include a policy statement from the Council that BNPL should not be available for purchases from off-licences including online sales.

11.7.3 Signage/advertising

As the Law Commission observed in 2010¹³², large obtrusive alcohol price advertisements and product branding on shop fronts, adjoining walls and sandwich boards is due in part to the pressure to compete with other bottle stores in a local community. The Law Commission further noted that the pervasiveness of alcohol signs and advertising at bottle stores is likely to have a negative impact on community well-being and can significantly lower the aesthetic value of an area, which in turn has flow-on effects for the community through reduced amenity values and community welfare.

There are few provisions in the Act to protect communities from the effects of exposure to alcohol advertising outside licensed premises. Section 237 (irresponsible promotion) does not address the volume of advertising found on the exterior of licensed premises, and the self-regulatory system for alcohol advertising administered by the Advertising Standards Authority does little to address exposure.

The evidence

Alcohol marketing has been established as a cause for youth to start drinking alcohol and to drink heavily once they start¹³³. Children and youth are exposed to alcohol marketing via a variety of means¹³⁴, such as storefront posters and promotions. In New Zealand, there is evidence that alcohol advertising is prevalent in urban settings, with tamariki Māori children disproportionately exposed^{135 136}.

In New Zealand, outside of supermarkets, children are exposed to alcohol marketing via a range of different media on average 4.5 times per day¹³⁷.

After reviewing thirteen longitudinal studies that reported on 38,000 young people, Anderson et al¹³⁸ found consistent evidence to link alcohol advertising with earlier uptake of drinking among youth and increased consumption once young people start drinking.

Research also shows that heavy or problem drinkers can be more responsive to alcohol advertising and imagery, placing them at risk of triggering relapse and the continuation of alcohol dependence^{139 140}.

DLCs around New Zealand have imposed conditions on a case-by-case basis. They have, for example, restricted signage to the store name and logo¹⁴¹ or limited the area permitted for advertising alcohol-based products to 25% of the exterior of the premises¹⁴², and stated that outside premises there will be no bright colours, flags,

sandwich boards, and specific product or price specials displayed. These conditions may be linked to protecting ‘sensitive sites’ (see section 11.4) – for example, limitations on signage or advertising may be more stringent for premises that are close to educational facilities.

Pros and cons of restricting off-licence advertising and signage in a LAP

Pros	Cons
Will decrease overall exposure to alcohol advertising, especially for vulnerable groups like youth and those struggling with alcohol dependence	Could potentially reduce sales and profitability of off-licence outlets
Less visible advertising may lead to reduced impulse purchases and overall consumption	May limit consumers' ability to make informed choices about prices and available products
Limits the normalisation of alcohol as just another commodity	Retailers may switch their marketing efforts to other channels e.g., direct mail and online, including social media promotion.
Avoiding exposure of ‘sensitive sites’ (e.g. schools) to excessive alcohol advertising and signage	
Improved community aesthetics and amenity values	
Alignment with public health goals – to reduce alcohol-related harm by limiting promotional activities	
May discourage harmful price wars between retailers – harmful for the businesses concerned and for the public being exposed to cheap alcohol offers.	

How other local councils have addressed signage/advertising

As of April 2024, most of the 41 LAPs in New Zealand have included conditions to address the harm from outdoor signage and advertising. Auckland Council has also issued a Practice Note¹⁴³ with examples of what is/is not acceptable external advertising outside or on the façade of off-licensed premises. Typically in LAPs, a discretionary condition is included that no more than 30% of the exterior of the premises shall be permitted to have alcohol marketing and signs, and at least 50% of the store front glazing should be transparent. The reason for this latter stipulation relates to Crime Prevention through Environmental Design (CPTED) principles, as the following guidance from the Health Promotion Agency (now part of Health NZ | Te Whatu Ora)¹⁴⁴ states: *“Reduce the number of advertising signs on windows and keep windows clear of shelving and displays to increase visibility. While you may get paid to have advertising on your windows, you must balance this with the need to keep your store safe and reduce the community’s exposure to alcohol advertising and its negative impacts on the amenity and good order of the locality”*.

Local situation

Many liquor stores in the Far North have large outdoor signs advertising alcohol and featuring price promotions.

The District Plan includes provisions relating to signs which must be observed by businesses. If the Council decides that a LAP should be developed, outdoor advertising by off-licences will be the subject of community consultation to understand how acceptable this is for the community. This could lead to discretionary policies in the LAP that may or may not be more restrictive than in the District Plan.



Local bottle store

11.7.4 Noise control

Introduction

Noise from licensed premises, such as bars, restaurants, and nightclubs, can be a significant issue affecting communities, especially residential areas late at night. This noise stems from amplified music and entertainment, patrons entering and leaving venues, loud conversations in outdoor areas such as beer gardens or smoking areas, late-night operations, and increased traffic.

This noise can disrupt residents’ sleep, reduce their quality of life, and lead to health problems.

Section 106(1) of the Act specifically mentions the effects of current, and possible future, noise levels on the amenity and good order of locations as a factor that DLCs should consider when issuing or renewing a licence. This issue should be considered by the DLC if the amenity and good order of a locality would likely be reduced by more than a minor extent by this noise.

The evidence

European research¹⁴⁵ indicates that chronic night-time noise exposure can lead to serious health issues and degrade quality of life. Studies show a correlation between noise pollution and various health problems, such as cardiovascular diseases and mental health disorders.

In New Zealand, the Ministry for the Environment refers to the economic impact of noise pollution including healthcare costs and the potential decline in property values in affected areas¹⁴⁶.

Addressing noise control issues via the RMA

The Resource Management Act 1991 (RMA) is the principal legislation governing the management of noise. Under the RMA, Far North District Council includes rules for controlling noise in the District Plan and a licensed premise may require a resource consent to comply with these rules including having noise reduction measures in place. The Council's Monitoring team monitors noise complaints and may issue abatement notices requiring the noise to be reduced.

Addressing noise control issues in a LAP

While discretionary noise control policies can be directly included in a LAP, other policies may indirectly help reduce noise, such as:

- Reducing the trading hours of premises, especially those close to residential areas
- Reducing the operating hours for outdoor drinking areas such as beer gardens
- Introducing one-way door policies to reduce noise from patrons leaving premises all at once.

More specific policy interventions may include:

- Requiring licencees to develop and implement noise management plans as a condition of their licence
- Establishing a system of escalating penalties for repeat noise offenders
- Requiring licencees to establish and maintain communication channels with neighbouring residents and respond to noise complaints.

Pros and cons of including conditions relating to noise control in a LAP

Pros	Cons
<p>Noise control conditions can significantly lower noise levels, improving the quality of life for nearby residents by reducing sleep disturbances and stress</p> <p>Lower noise levels can contribute to better overall health for the community, reducing risks of issues such as cardiovascular problems and mental health disorders</p> <p>A LAP can tailor noise control measures to local contexts and specific issues e.g. premises close to residential areas</p> <p>Noise control provisions in a LAP can complement and reinforce other local planning instruments like the District Plan</p> <p>Reducing noise pollution can maintain or even increase property values in residential areas</p>	<p>Implementing noise control measures, such as soundproofing or installing noise barriers, can be expensive for business owners</p> <p>Restrictions on operating hours of the premise or parts of the premise (e.g. a beer garden) can limit the ability of businesses to attract customers, potentially reducing their revenue</p> <p>Striking a balance between the interests of residents and business owners may be difficult, potentially leading to ongoing conflicts</p>

How other councils have addressed noise control issues in their LAPs

Some LAPs have specific policies relating to noise control, for example:

- The New Plymouth/Stratford and Tasman LAPs require the cessation of entertainment (e.g. bands) at a specified time to be decided by the DLC for affected premises
- The Tauranga/Western Bay of Plenty LAP states that licences should restrict the use of outdoor areas after 10pm, and requires an acoustic design certificate a) if a tavern is the subject of complaints, and b) for all new on-licensed and club premises with a residential boundary within 500 metres
- The Thames Coromandel LAP requires all on-licence and club licence premises to have noise management plans.

Local situation

The DLC routinely considers the noise level of licensed premises and its effects on the amenity and good order of localities when it issues or renews licences. It has included conditions in licences to mitigate and reduce this noise.

While some broad guidelines regarding noise control may be helpful in a LAP, how the DLC applies these guidelines will come down to individual premises, considering how close they are to residential areas, their hours of operation, whether they have outdoor drinking areas, and whether they have live bands, etc.

11.7.5 Safety and security of licensed premises

Introduction

Safety and security can be an issue for all types of licences.

On-licences such as bars and taverns can be volatile environments due to alcohol consumption increasing patrons' aggression and impairing judgment, with crowded spaces leading to accidental conflicts, and diverse social groups creating the potential for misunderstandings. Additionally, factors like loud music, dim lighting, and fatigue in combination with alcohol consumption can exacerbate miscommunication and stress, further heightening the risk of altercations.

Off-licences such as supermarkets and bottle stores face significant safety and security issues, including theft and robbery due to the high resale value of alcohol.

Pros and cons of including conditions relating to safety and security in a LAP

Pros	Cons
<p>Including safety and security conditions may reduce alcohol-related harm, such as abusive behaviour, violence, and accidents at on-licences, making premises safer for patrons and staff.</p> <p>Measures like CCTV surveillance, restricted serving times, and trained security personnel can deter criminal activities like theft, shoplifting, and robbery at off-licences, making these premises safer for customers and staff</p> <p>Staff training and clear incident management protocols can ensure a safe and orderly environment for all types of licensed premises</p> <p>Engaging with local communities and authorities to address safety and security concerns can foster better relationships and help improve the amenity and good order of neighbourhoods</p> <p>Conditions relating to incident registers and response protocols can ensure that licencees maintain high standards of accountability and compliance with the law</p> <p>Encouraging the availability of low-alcohol and non-alcoholic beverages can promote and allow for healthier drinking habits and can reduce overall alcohol consumption.</p>	<p>Implementing security measures, employing security staff, installing CCTV cameras and staff training etc. can increase operational costs for licencees</p> <p>Compliance with detailed conditions can be burdensome for licencees, requiring significant time and effort to maintain records and ensure adherence to regulations.</p>

How other councils have addressed safety and security in their LAPs

Discretionary conditions relating to safety and security are very common in LAPs. Typical conditions include:

Host responsibility for On-Licences and Clubs

- adoption of a host responsibility policy
- restrictions on the size (e.g. 'doubles') and time of 'last orders'
- no shots to be served after specified times
- restriction on the number of drinks per customer
- restrictions on permitted drinking vessels
- no alcohol service for a specified time before closing time
- display of safe drinking messages/material.

Security management

- provision of additional security staff after a set time e.g. 11pm
- provision of door staff wearing high visibility clothing
- setting a patron number to security staff ratio
- setting a patron number to bar manager ratio
- design and layout requirements
- minimum seating requirements
- maximum numbers of patrons
- management of patrons queuing to enter the licensed premise
- training requirements for staff
- management requirements in relation to staff (e.g. number of staff, duty managers)

Incident management and response protocols

- regular briefings and coordination among staff to ensure everyone is aware of their roles in an incident
- a qualified manager to be on duty during busy periods e.g. Friday and Saturday nights
- the licensee is required to notify the Police of any incidents involving disorderly conduct that occur on the premises
- the licensee is required to maintain a register of incidents involving disorderly conduct that is available for inspection by enforcement authorities at any time during trading hours
- licensed outside areas to be monitored at all times.

Crime Prevention through Environmental Design (CPTED) Principles

- application of the principles of Crime Prevention Through Environmental Design (CPTED)
 - the installation and operation of CCTV cameras on the exterior of, and within premises to monitor vulnerable areas
- effective lighting is installed
 - to enable passive surveillance by staff and active surveillance by CCTV
 - to enable customers to be seen as they enter the premises
 - to enable staff to check IDs
 - external areas such as car parks and loading bays are well lit, subject to the requirements of any resource consent or District Plan rule
- general points of sale are positioned near the main entrance
- at least 50% of any store front glazing shall be transparent, consistent with CPTED guidelines

Community engagement

- requiring engagement with local communities and authorities to help address their safety concerns
- cleaning the outside of the premises and immediate environs

Conditions re special events

- requirement for an Alcohol Management Plan where alcohol is available for sale at a proposed event or series of events, that will attract more than x people (e.g. 500 people)
- no glassware is to be taken outside the building or onto grass or artificial grass surfaces
- plastic containers or cans to be used for any event (except when alcohol is being served and remains within the building)
- wine to be sold by the glass only and no bottle sales to occur
- areas to be clearly defined/ cordoned off where liquor is being sold/consumed outside of the building (e.g. beer tent). Drinkers to remain within the defined area
- the holder of a manager's certificate to be present when alcohol is available for sale
- the number of manager's certificate holders required at an event may be specified
- the maximum number of alcoholic drinks per sale transaction may be specified
- 'one-way door' restriction to apply from a specified time
- careful consideration of the appropriateness of alcohol associated with driving events and such applications may be refused
- allowing the Police to request an earlier closing time for the sale of alcoholic beverages if considered necessary.

Conditions that could apply locally

If the Council decides that a LAP is developed, consultation with key stakeholders in the district including the Police, the Medical Officer of Health, and Licencing Inspectors will be necessary to assess possible conditions relating to the safety and security of licensed premises that could apply in the Far North. Licencees will also be asked to submit their views on these possible conditions.

11.7.6 Community input into licencing applications

Community input into licencing decisions is a key element of the Act

The purpose of the Act stated in section 4 is “for the benefit of the community as a whole”. This implies that the community should be able to have its say on licencing applications.

Section 102 of the Act states that any person (with some narrow exceptions relating to trade competition) may object to a licence application, whether as an individual or as a representative of a group or an organisation. The objection must be made within 25 days of the publication of the public notice regarding the application.

The amendments to the Act introduced in 2023 have allowed for greater community input into licencing applications, including:

- allowing “any person” to object to a licence application, rather than just those with a “greater interest” than the general public
- extending the time to make an objection from 15 to 25 days after the public notice of a licence application
- parties can attend DLC hearings remotely
- cross-examination is not allowed (the DLC will test the evidence)
- tikanga may be incorporated into proceedings and evidence may be presented in te reo Māori.

Issues that the public may experience in making objections

A qualitative study conducted in 2022 by Te Whatu Ora¹⁴⁷ in several communities where a liquor store licence was granted or renewed despite community objections, identified a range of issues that the public had in presenting their views, including:

- the design and administration of the licencing system discouraged Māori from participating and sometimes excluded and discounted Māori input
- there was little evidence of proactively facilitating engagement with Māori in licencing decisions, as appropriate to Crown obligations under Te Tiriti o Waitangi, the Treaty of Waitangi and the Local Government Act 2002
- the method used to notify the public of licence applications was a substantial barrier to community participation. For instance, public notices of licence applications were largely placed in newspapers – a community objector in the study said, *“the notices would be in the (paper name), they’re shoved on the back page so nobody in the community would know that they’re there”*. Many participants in this study suggested using a flyer in the mail or social media, typically the community Facebook page
- the location of hearings could be a barrier: *“The hearings themselves need to be in more of a community friendly place, either on a marae or in a community hall, or somewhere where the community can actually access”*
- also, the timing of hearings was an issue: *“it would be really helpful to the community if they were held at a time that would suit them, either on a Saturday morning or even in the late afternoon, so that people who work and who are generally interested, are able to attend”*.

Pros and cons of seeking more community input into alcohol licence applications

Pros	Cons
<p>Community input can provide valuable insights into local concerns, helping the DLC make more informed and balanced decisions regarding alcohol licencing</p> <p>Involving the community fosters a sense of ownership and responsibility, making residents feel more connected to licencing decision-making processes</p> <p>Specifically seeking input from local iwi and hapu is important given Council's obligations under Te Tiriti o Waitangi and the disproportionate impacts that Māori experience from alcohol related harm</p>	<p>Community members may lack the technical knowledge or expertise required to assess licencing decisions</p> <p>Differing opinions within the community may lead to conflict, e.g. tensions between residents and businesses</p>

Local situation

In its Annual Report to ARLA for 2022/23, the Far North DLC noted that *"any consultative community guidelines will be welcomed by the DLC when we consider applications in the future"*. Community groups have also asked to be involved in these decisions. For instance, Whiria Te Muka has requested that iwi are asked to have their say on all licencing applications in the Te Hiku area.

If the Council agrees that a LAP should be developed, the nature of consultative community guidelines in a LAP, if any, will be addressed. Conceivably Council's Communications and Engagement Team could help develop these guidelines.

11.7.7 Provisions regarding under-age drinking and exposure of young people to alcohol

The evidence

As noted in sections 9.2.1 and 9.2.2, there are risks to young people from alcohol consumption and exposure to alcohol advertising:

- Alcohol consumption during adolescence can impair brain development, damage organs, and increase the risk of addiction and mental health issues
- The Ministry of Health advises delaying alcohol use until late teenage years and recommends moderation if drinking occurs
- Young adults in Northland are more likely than the population as a whole to engage in binge drinking and be involved in alcohol-related fatal crashes
- Early exposure to alcohol advertising is linked to earlier drinking onset and heavier drinking among adolescents.

Provisions in the Act

The Act has provisions relating to minors drinking in licensed premises (sections 119, 244, 245), irresponsible advertising or promotion of alcohol to minors (section 237 and 288) and supplying alcohol to minors (section 241). Offences in these areas may result in the prosecution or conviction of managers and licencees, and/or variation, suspension or cancellation of their licences. These provisions are enforced by the Police and Licencing Inspectors. Given the broad nature of the provisions in the Act, additional policies in a LAP may be redundant.

Pros and cons of including discretionary provisions in a LAP relating to under-age drinking and exposure of young people to alcohol

Pros	Cons
<p>Decreasing the likelihood of underage drinking and its associated risks such as alcohol-related accidents, injuries, and long-term health issues among young people</p> <p>Effective policies can contribute to a culture of responsible drinking, promoting overall public health and safety.</p> <p>Reducing exposure of young people to alcohol may help prevent the early onset of alcohol dependence and abuse, which often begins in adolescence.</p>	<p>Strict enforcement can be difficult and resource-intensive, requiring consistent monitoring.</p> <p>Provisions relating to minors are well covered in the Act.</p>

How other councils have addressed this area

Only a few Councils have included provisions relating to minors in their LAPs. Some examples include:

No sales to those in school uniform

All events that have a sole or significant focus on alcohol consumption such as wine/beer festivals must be designated R18 events and promoted and managed accordingly.

No school fete, gala or similar event held on school grounds at which the participation of children can be reasonably expected shall allow for the consumption of alcohol on the premises.

Local situation - Controlled Purchase Operations (CPOs) show that underage sales is an ongoing problem in the district

CPOs are designed to monitor the provisions in the Act relating to the sale of alcohol to minors. CPOs involve volunteers aged under 18 years attempting to buy alcohol from licensed premises, under the supervision of the Police, with support from the Public Health service. If a volunteer successfully purchases alcohol from a licensed premise, then ARLA is notified and the licensee, manager and bar owner can be prosecuted in the District Court or subject to an enforcement application lodged with ARLA seeking suspension or cancellation of the licence. Results from CPOs conducted in the district since 2018/19 are as follows:

Table 16: CPO results in the Far North, 2018 to April 2024¹⁴⁸

	2018/19	2019/20	2022	2023	2024 to April	TOTAL
Number of premises approached	25	34	20	16	13	108
Number of sales to minors	4	5	2	2	3	16
Percent of premises	16%	15%	10%	13%	23%	15%

These results indicate that, over recent years, between 10% and 23% of licensed premises have been serving underage drinkers, a significant issue in the district. This suggests that a LAP for the district may look to include discretionary provisions relating to minors.

12 Initial views of key stakeholders regarding making a LAP

The Act says that the Council must not produce a draft LAP without having consulted the Police, Inspectors, and the Medical Officer of Health. Hence, these stakeholders were asked for their initial thoughts about making a LAP.

NB. If Council agrees that a LAP should be developed, in the Design stage of the project more formal engagement will take place with these parties, and with the public (including a public survey).

12.1 Police

The Alcohol Harm Prevention Officer (AHPO) for the Mid/Far North Police District said that Police in the District would support a LAP in the Far North to prevent harm to the community. The evidence relied on to support this would be the information provided by Police National Headquarters covering alcohol-related crime and domestic violence in the district [included in this report]. The AHPO believes that the provisions that a LAP would bring to the area would likely assist in the reduction of alcohol-related offending of all kinds and make communities safer. These provisions would also enhance the objects of the Act. The AHPO also commented that generally the Mid/Far North area consists of at-risk populations who are vulnerable to the lure of alcohol and all types of associated crime.

12.2 Medical Officer of Health

The Medical Officer of Health expressed support for developing a LAP, saying *“The Far North is overrepresented in both access to alcohol sales and the harm from alcohol related sales. There is a significant opportunity to address this imbalance through a LAP to achieve a safer and more responsible system of alcohol related sale and supply in the Far North, which would be in keeping with the object of the Sale and Supply of Alcohol Act”*.

12.3 Licencing Inspectors

Three out of the five Licencing Inspectors including the Chief Inspector support developing a LAP while two are neutral on the matter. Reasons for supporting a LAP include:

- *“We should be doing as much as we can regarding alcohol-related harm. So, a LAP is necessary”*
- *“Implementing a LAP tailored to the Far North District would enable us to address some of the issues that we see within our communities. i.e. alcohol related harm. It may be a small step, but it would ‘give us a backbone’”*
- *“By having some local control, we can better manage the availability and accessibility of alcohol within our communities. This, in turn, can help mitigate the risks associated with alcohol-related harm.*

- *“A LAP can contribute to creating safer environments and can reduce the likelihood of alcohol-related incidents occurring in public spaces. This not only enhances public safety but also includes community engagement”.*

12.4 The District Licencing Committee

In its 2022/23 Annual Report to ARLA, the DLC said it would welcome any council move to develop a LAP and would appreciate consultative community guidelines in the LAP.

13 Summary and discussion

13.1 The alcohol industry provides a range of positive benefits to the district

Positive benefits include:

- support for the local economy through revenue generated by alcohol sales and through direct and indirect employment
- support for the hospitality and tourism sectors
- on-licence premises serve as social hubs where people gather to socialise, network, and celebrate special occasions
- licensed restaurants offer patrons the opportunity to consume alcohol with food
- supermarkets, groceries, and bottle stores are convenient outlets to purchase alcohol
- sponsorship and funding community groups and events.

13.2 Serious alcohol-related harm is occurring in the region and in the district

Some key findings include:

- 22% of Northland residents were classified as hazardous drinkers in 2017 to 2020 (this represents an estimated 13,200 residents in the district)
- 26% were frequent binge drinkers i.e. consuming at least six standard drinks per occasion at least monthly (estimated 13,800 people in district)
- the proportion of hazardous drinkers increased by 38% from 2011-2014 to 2017-2020
- in a Ministry of Health Survey for the 2019-2020 period, 45% of Northland adults said they had experienced alcohol-related harms in the past year, with 37% from others' drinking and 26% from their own drinking
- the rate of hospital admissions solely attributable to alcohol in the Far North was 112 admissions per 100,000 people per year from 2016 to 2018, placing the district in 6th worst place out of all territorial authorities
- the Far North has a 70% higher mortality rate wholly attributable to alcohol than the national average
- driving under the influence is more common in the Far North than nationally, with the rate of alcohol and drug-related crashes causing injuries being 76% higher in the Far North than in New Zealand overall
- alcohol was a contributing factor in 11 drowning cases in the district from 2014 to 2023, though this is likely to be under-reported due to incomplete toxicology reports
- in 2023, the Police attended 1,174 incidents in public spaces where alcohol was a contributing factor. This behaviour affects community amenity and order, with intoxicated individuals often being loud and unruly, vomiting or urinating in public, intimidating or assaulting others, damaging property, and littering
- in 2023, the Police prosecuted 707 offenders in the Far North where alcohol was a factor in the offending
- there were 1,001 instances of alcohol-related family violence recorded by the Police in the Far North in 2023
- in the Te Hiku area in 2023, there were 329 instances of family/whānau violence triggered by alcohol affecting 783 people, including 178 children under the age of 17
- in 2019/20, 12% of drinkers in Northland reported feeling worried or stressed about money because of their drinking.

13.3 Opportunity to develop a LAP for the district

Developing a LAP could represent a significant step towards regulating the sale, supply, and consumption of alcohol within the district. Developing policy guidelines regarding alcohol licencing in a LAP could help minimise alcohol-related harms that impact public health, safety, and community wellbeing. These provisions would need to balance peoples' ability to purchase and consume alcohol in a responsible manner, and for licencees to supply alcohol in a responsible manner, with measures to minimise and reduce the harms associated with unsafe drinking.

13.4 Possible policy measures referencing broad areas in the district

The research has identified several broad geographical areas that could be considered when issuing or renewing alcohol licences:

- **areas of high deprivation** - residents from these areas are particularly vulnerable to the financial harms associated with heavy drinking
- **licencing Zones** - the district has two distinct licencing zones: with roughly half of all licences in the Bay of Islands Tourist Zone and the other half in the Wider District. Tailoring policies for each Zone could address specific needs in each area
- **areas with high alcohol-related hospital admissions and criminal offending** - data on hospital admissions attributable to alcohol and crime statistics, such as domestic violence and driving under the influence, can inform decisions on where to have stricter licence conditions
- **areas with high proportions of vulnerable people** including children, adolescents, and Māori.

13.5 Possible policy measures referencing specific neighbourhoods and sensitive locations

Policy guidance could focus more narrowly on specific neighbourhoods and sensitive sites or locations by

- a) **regulating the proximity of licensed premises to sensitive locations such as schools, playgrounds, places of worship, marae, medical centres, addiction treatment centres, and residential areas**

This could help:

- protect children and adolescents from exposure to alcohol advertising and avoid the normalisation of alcohol sales
 - maintain the amenity and good order of localities and protect residential areas from noise pollution
 - protect culturally significant places such as marae from the negative effects of alcohol consumption
 - reduce the accessibility of alcohol near medical facilities to avoid temptation for those who are dependent on alcohol and/or medically unfit to consume alcohol.
- b) **regulating the density of alcohol outlets in particular towns and townships** – the density of outlets in the district is higher than the national average and, in general, from New Zealand and international studies, a higher density of premises is associated with more alcohol-related harm. LAPs for other districts have capped the number of outlets in particular towns/suburbs. Controlling the density of licensed premises can also protect the economic viability of existing businesses

13.6 Possibly setting maximum trading hours for licensed premises

A LAP could set **maximum trading hours** that are more or less restrictive than the national default trading hours. These measures would aim to:

- reduce late-night intoxication and associated violence and disorderly behaviour
- reduce road crashes due to alcohol consumption (see section 9.5)
- reduce alcohol-related criminal offences (see section 9.9)

NB. On-licences in the district already have more restrictive closing times than the national default hours, in part due to the Police and Licencing Inspectors objecting to later hours. Also, actual closing times tend to be earlier than permitted times for most types of premises except for taverns.

13.7 Possible one-way door restrictions

One-way door restrictions may help minimise the risk of violence and disorderly behaviour by preventing patrons leaving a bar or tavern to side-load in their cars then returning to the premises in a more intoxicated state where they may cause an incident. These restrictions can also manage the flow of patrons once they have left the premises, with groups of people leaving in a staggered manner rather than in a crowd at closing time. Various studies have reported mixed results with one-way door restrictions, suggesting that these restrictions should be applied where there is a demonstrated need rather than be a district-wide requirement.

13.8 Possible discretionary conditions

A LAP could also include discretionary conditions to cover areas such as:

- single-unit sales
- Buy Now Pay Later schemes
- signage/advertising
- noise control
- safety and security
- seeking community views on alcohol licence applications
- under-age drinking and exposure of young people to alcohol.

13.9 Need to understand the community's views re making a LAP

If Council decides that a LAP should be developed, preparing a draft LAP will require community engagement to understand local preferences and perspectives. Under the Act, Council must also consult with the Police, the Medical Officer of Health and the Licencing Inspectors.

14 Conclusion

Overall, the report reinforces the observation that alcohol is 'no ordinary commodity'. While the alcohol industry provides a range of benefits to the community, there are many serious harms and problems associated with excessive and unsafe consumption of alcohol in the district.

A LAP may significantly contribute to promoting the well-being of the Far North community by reducing alcohol-related harms and problems through policy guidance to the DLC.

If Council decides that a LAP should be developed, the evidence and analysis in this report provides a starting point to designing a draft LAP. The next step would be strong engagement with the community and key stakeholders to understand community preferences and stakeholder needs.

APPENDIX ONE – RELEVANT OBJECTIVES AND POLICIES IN COUNCIL’S OPERATIONAL DISTRICT PLAN AND PROPOSED DISTRICT PLAN

Following are some objectives and policies in the current Operational District Plan (ODP) and the Proposed District Plan (PDP) which could be relevant in developing a LAP for the district.

Relevant objectives in the ODP

ODP Objectives	
2.7.1	Through the provisions of the Resource Management Act, to give effect to the rights guaranteed to Māori by Te Tiriti O Waitangi (Treaty of Waitangi)
7.3.1	To ensure that urban activities do not cause adverse environmental effects on the natural and physical resources of the district
7.3.3	To avoid, remedy or mitigate the adverse effects of activities on the amenity values of existing urban environments
7.3.4	To enable urban activities to establish in areas where their potential effects will not adversely affect the character and amenity of those areas
8.3.3	To avoid, remedy or mitigate the adverse and cumulative effects of activities on the rural environment
8.3.7	To promote the maintenance and enhancement of amenity values of the rural environment to a level that is consistent with the productive intent of the zone
8.3.10	To enable activities compatible with the amenity values of rural areas and rural production activities to establish in the rural environment
9.3.1	To protect recreation and conservation areas for the purposes for which they have been set aside or reserved
10.3.1	To manage coastal areas in a manner that avoids adverse effects from subdivision, use and development

Relevant policies in the ODP

ODP Policies	
2.8.3	That the Council will have regard to relevant provisions of any whanau, hapu or iwi resource management plans, taiāpure plans or mahinga mātaihai plans
7.4.1	That amenity values of existing and newly developed areas be maintained or enhanced
7.4.2	That the permissible level of effects created or received in residential areas reflects those appropriate for residential activities
8.4.2	That activities be allowed to establish within the rural environment to the extent that any adverse effects of these activities are able to be avoided, remedied or mitigated and as a result the life supporting capacity of soils and ecosystems is safeguarded, and rural productive activities are able to continue.
8.4.5	That plan provisions encourage the avoidance of adverse effects from incompatible land uses [in the rural environment]
9.4.4	That the effects of activities in the vicinity of recreation and conservation areas are managed so that recreation and conservation areas are not compromised
10.4.1	That the Council only allows appropriate subdivision, use and development in the coastal environment

Relevant objectives in the PDP

PDP Objectives	
SD-CP-01	Te Tiriti o Waitangi partnerships support iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua
SD-SP-03	Encourage opportunities for fulfilment of the community's cultural, social, environmental, and economic wellbeing
SD-EP-01	A high-earning diverse local economy which is sustainable and resilient to economic downturns
SD-EP-02	Existing industries and enterprises are supported and continue to prosper under volatile and changing economic conditions
SD-UFD-01	The wellbeing of people who live in and visit towns in the Far North is considered first when it comes to planning places and spaces.
NOISE-01	Activities generate noise effects that are compatible with the role, function and character of each zone and do not compromise community health, safety and wellbeing
NOISE-02	New noise sensitive activities are designed and/or located to minimise conflict and reverse sensitivity effects
GRZ-03	Non-residential activities contribute to the well-being of the community while complementing the scale, character and amenity of the General Residential zone

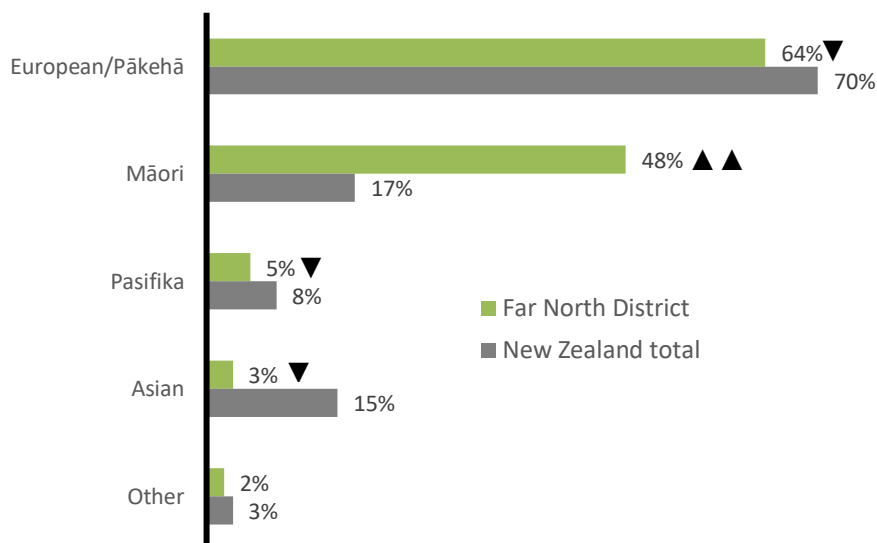
PDP Objectives	
SD-RE-O2	Protection of highly productive land from inappropriate development to ensure its production potential for generations to come [in the rural environment]
RPROZ-O2	The Rural Production zone is used for primary production activities, ancillary activities that support primary production and other compatible activities that have a functional need to be in a rural environment
RPROZ-O4	The rural character and amenity associated with a rural working environment is maintained [in the Rural Production Zone]
RLZ-O3	The role, function and predominant character and amenity of the Rural Lifestyle zone is not compromised by incompatible activities
RRZ-O1	The Rural Residential zone is used predominantly for rural residential activities and small-scale farming activities that are compatible with the rural character and amenity of the zone
RSZ-O1	Rural and coastal settlements are used predominantly for residential activities and are sustained by a range of compatible activities and services
MUZ-O2	Development in the Mixed Use zone is of a form, scale, density and design quality that contributes positively to the vibrancy, safety and amenity of the zone

Relevant policies in the PDP

PDP Policies	
NOISE-P1	Uphold the character and amenity of each zone by controlling the types of activities and noise levels that are permitted in each zone
NOISE-P3	Ensure noise effects generated by an activity are of a type, scale and level that are appropriate for the predominant role, function and character of the receiving environment
GRZ-P4	Enable non-residential activities that: <ul style="list-style-type: none"> a) do not detract from the vitality and viability of the Mixed Use zone; b) support the social and economic well-being of the community c) are of a residential scale d) and are consistent with the scale, character and amenity of the General Residential zone
GRZ-P8	Manage land use ... to address ... consistency with the scale, design, amenity and character of the residential environment
RPROZ-P2	Ensure the Rural Production zone provides for activities that require a rural location by: <ul style="list-style-type: none"> a) enabling primary production activities as the predominant land use b) enabling a range of compatible activities that support primary production activities, including ancillary activities, rural produce manufacturing, rural produce retail, visitor accommodation and home businesses
RRZ-P1	Enable activities that will not compromise the role, function and predominant character and amenity of the Rural Residential zone, while ensuring their design, scale and intensity is appropriate
RLZ-P1	Enable activities that will not compromise the role, function and predominant character and amenity of the Rural Lifestyle zone
RSZ-P3	Enable non-residential activities in the Settlement zone that are of a scale, intensity, character and amenity that compliments the residential activities in the settlement
MUZ-P1	Enable a range of commercial, community, civic and residential activities in the Mixed Use zone where it supports the function, role, sense of place and amenity of the existing environment
CE-O1	The natural character of the coastal environment is identified and managed to ensure its long-term preservation and protection for current and future generations

APPENDIX TWO – DEMOGRAPHICS OF THE FAR NORTH POPULATION COMPARED WITH THE NATIONAL POPULATION FROM 2018 CENSUS RESULTS

Figure 24: Ethnic profile - Far North District versus New Zealand total

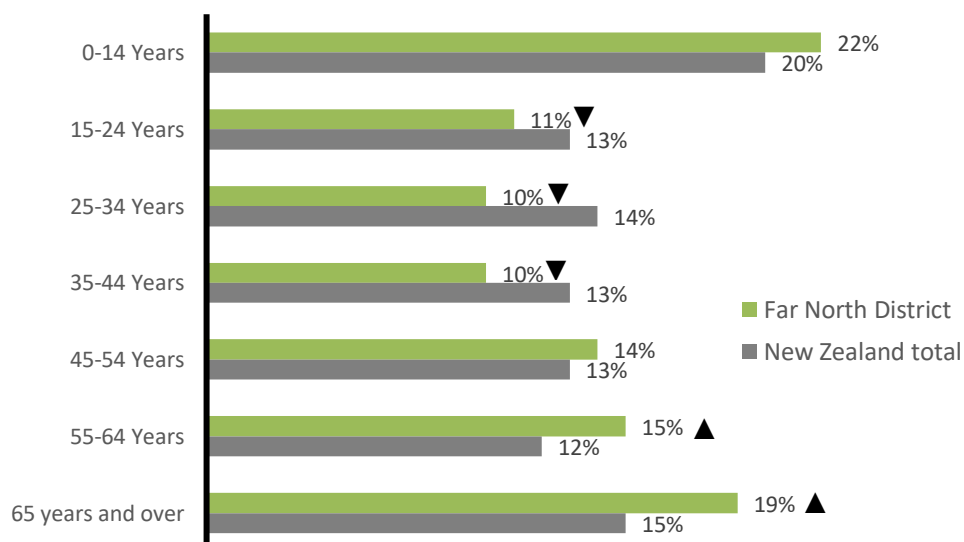


KEY: ▲ ▼ Far North District significantly higher/lower than the national total $p < 0.05$

NB. Totals add to more than 100% as people could state more than one ethnicity

Age

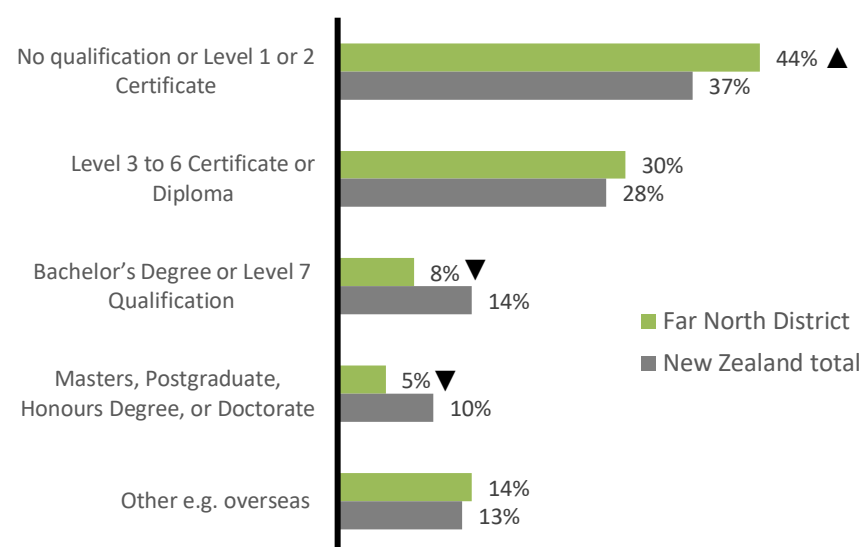
Figure 25: Age profile - Far North District versus New Zealand total



KEY: ▲ ▼ Far North District significantly higher/lower than the national total $p < 0.05$

Highest education level

Figure 26: Highest levels of education – Far North District versus New Zealand total

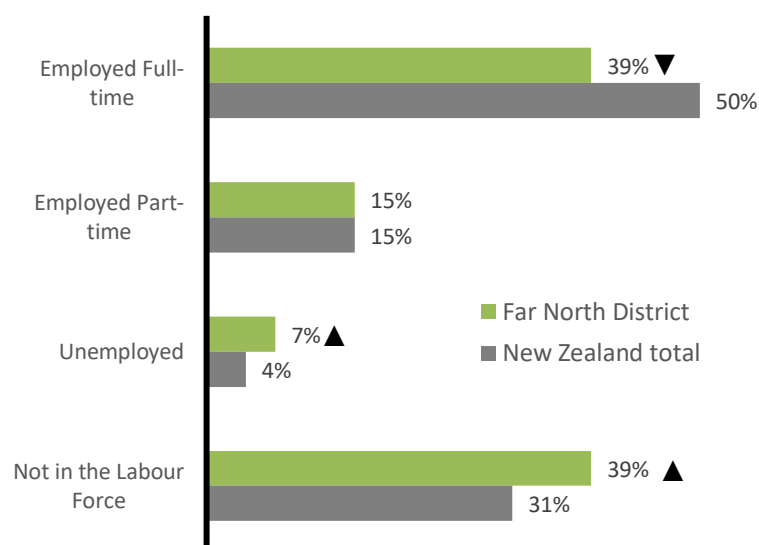


KEY: ▲ ▼ Far North District significantly higher/lower than the national total $p < 0.05$

Base: Aged 15 or more

Work status

Figure 27: Work Status – Far North District versus New Zealand Total

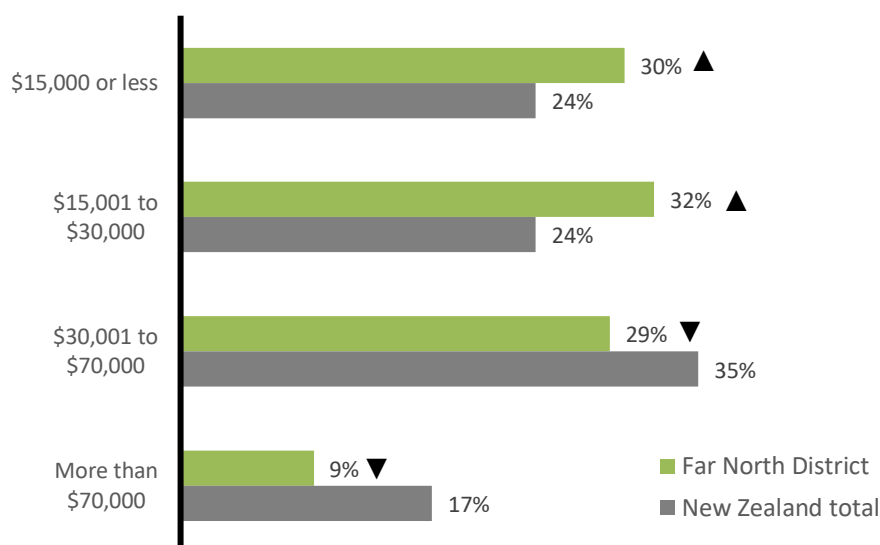


Base: Aged 15 or more

KEY: ▲ ▼ Far North District significantly higher/lower than the national total $p < 0.05$

Income

Figure 28: Annual personal incomes – Far North District versus New Zealand total

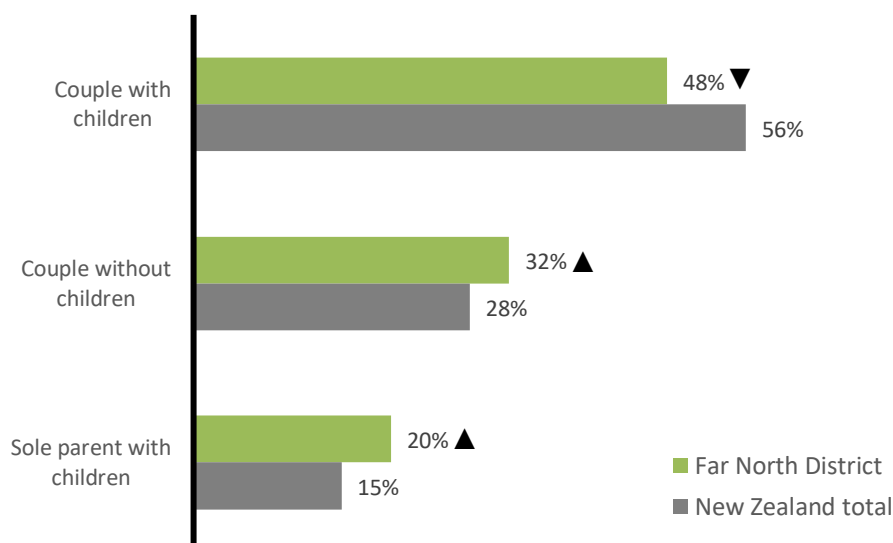


Base: Aged 15 or more

KEY: ▲ ▼ Far North District significantly higher/lower than the national total $p < 0.05$

Family types

Figure 29: Family types – Far North District versus New Zealand total



KEY: ▲ ▼ Far North District significantly higher/lower than the national total $p < 0.05$

Base: Living in a family

APPENDIX THREE – LICENSED PREMISES IN THE DISTRICT, JANUARY 2024

The following table is ordered by licence type and then by town. It excludes temporary licences.

Type	Venue	Town
Club-licence	Kaitāia Golf Club	Ahipara
Club-licence	Te Rarawa Rugby Club	Ahipara
Club-licence	Awanui Sports Complex	Awanui
Club-licence	Coopers Beach Bowling Club	Coopers Beach
Club-licence	Houhora Big Game & Sports Fishing Club	Houhora
Club-licence	Houhora Golf Club	Houhora
Club-licence	Kāeo Bowling Club	Kāeo
Club-licence	Kāeo Rugby Football Club	Kāeo
Club-licence	Whangaroa Golf Club	Kāeo
Club-licence	Kaikohe Bowling Club	Kaikohe
Club-licence	Kaikohe Golf and Squash Club	Kaikohe
Club-licence	Kaikohe Rugby Football and Sports Club	Kaikohe
Club-licence	Far North (Kaitāia) R S A	Kaitāia
Club-licence	Kaitāia Aero Club	Kaitāia
Club-licence	Kaitāia City Rugby Football Club	Kaitāia
Club-licence	Kaitāia Tennis & Squash Club	Kaitāia
Club-licence	Northland Riders Club	Kaitāia
Club-licence	Kawakawa & Districts RSA	Kawakawa
Club-licence	Kawakawa Bowling Club	Kawakawa
Club-licence	Bay of Islands Kerikeri Golf Club	Kerikeri
Club-licence	Baysport Pavilion	Kerikeri
Club-licence	Kerikeri Bowling Club	Kerikeri
Club-licence	Kerikeri Cruising Club	Kerikeri
Club-licence	Kerikeri Sports Complex	Kerikeri
Club-licence	Kohukohu Bowling Club	Kohukohu
Club-licence	Mangōnui Cruising Club	Mangōnui
Club-licence	Ōhaeawai R F & Sports Club	Ōhaeawai
Club-licence	Ōkaihau Bowling Club	Ōkaihau
Club-licence	Ōkaihau Golf Club	Ōkaihau
Club-licence	Ōkaihau R U F & Sports Club	Ōkaihau
Club-licence	Hokianga Memorial RSA Inc	Ōmāpere
Club-licence	Ōpononi Bowling Club	Ōpononi
Club-licence	Ōpua Cruising Club	Ōpua
Club-licence	Otaua Sports Club	Otaua
Club-licence	Otiria Rugby & Sports Club	Otiria
Club-licence	Paihia Ex-Servicemens Club	Paihia
Club-licence	Pawarenga Old Boys Club	Pawarenga
Club-licence	Houhora Bowling Club	Pukenui
Club-licence	Rāwene Golf Club	Rāwene
Club-licence	Rāwene Masonic Hotel Pool Club	Rāwene
Club-licence	Bay of Islands Swordfish Club	Russell
Club-licence	Russell Boating Club	Russell
Club-licence	Russell Bowling Club	Russell
Club-licence	Russell RSA	Russell
Club-licence	Eastern United Rugby Football Club	Taipa
Club-licence	Te Aupouri R F & Sports Club	Te Kao
Club-licence	Waimamaku Bowling Club Incorporated	Waimamaku
Club-licence	Waipapakauri Sports Complex	Waipapakauri

Type	Venue	Town
Club-licence	Bay Of Islands Yacht Club	Waitangi
Club-licence	Waitangi Golf Club	Waitangi
Club-licence	Whangaroa Sport Fishing Club	Whangaroa
Off-licence	Ahipara Liquor Store	Ahipara
Off-licence	Awanui Superette	Awanui
Off-licence	Broadwood General Store	Broadwood
Off-licence	Coopers Beach Four Square	Coopers Beach
Off-licence	Thirsty Liquor	Coopers Beach
Off-licence	Historic Gumstore & Bar & Grill	Kāeo
Off-licence	Kāeo Four Square	Kāeo
Off-licence	Countdown Kaikohe	Kaikohe
Off-licence	Kaikohe Liquorland	Kaikohe
Off-licence	New World Kaikohe	Kaikohe
Off-licence	The Shed Liquor Shop	Kaikohe
Off-licence	Far North (Kaitāia) R S A	Kaitāia
Off-licence	Kaitāia Food Market	Kaitāia
Off-licence	Okahu Estate Winery	Kaitāia
Off-licence	Pak N Save Kaitāia	Kaitāia
Off-licence	Pick A Box Limited	Kaitāia
Off-licence	Super Liquor Kaitāia	Kaitāia
Off-licence	The Bottle-O Kaitāia	Kaitāia
Off-licence	Thirsty Liquor Kaitāia	Kaitāia
Off-licence	Waitapu Estate Vineyard	Kaitāia
Off-licence	Kawakawa Four Square	Kawakawa
Off-licence	Kiwi Liquor	Kawakawa
Off-licence	Klondike Ale House (Thirsty Liquor)	Kawakawa
Off-licence	144 Islands Wines	Kerikeri
Off-licence	Black Collar Distillery	Kerikeri
Off-licence	Cottle Hill Winery	Kerikeri
Off-licence	Countdown Kerikeri	Kerikeri
Off-licence	Fat Pig Vineyard	Kerikeri
Off-licence	Ferment	Kerikeri
Off-licence	Kainui Road Vineyard	Kerikeri
Off-licence	Liquorland Kerikeri	Kerikeri
Off-licence	Marsden Estate	Kerikeri
Off-licence	New World Kerikeri	Kerikeri
Off-licence	Sovrano Winery	Kerikeri
Off-licence	Super Liquor Kerikeri	Kerikeri
Off-licence	The Landing Wines	Kerikeri
Off-licence	Waipapa Four Square	Kerikeri
Off-licence	Hokianga Harbour Hotel	Kohukohu
Off-licence	Dancing Petrel	Mangōnui
Off-licence	Four Square Mangōnui	Mangōnui
Off-licence	Mangōnui Hotel	Mangōnui
Off-licence	Matauri Bay General Store	Matauri Bay
Off-licence	Matauri Café & Bar	Matauri Bay
Off-licence	Blue Lagoon Four Square	Moerewa
Off-licence	Klondike Tavern	Moerewa
Off-licence	Ōhaeawai Hotel	Ōhaeawai
Off-licence	Ōkaihau Liquor	Ōkaihau
Off-licence	Ōmāpere Foodmart	Ōmāpere
Off-licence	Ōpononi Four Square	Ōpononi

Type	Venue	Town
Off-licence	Ōpononi Hotel	Ōpononi
Off-licence	Ōpua General Store	Ōpua
Off-licence	Roadrunner Tavern & Super Liquor	Ōpua
Off-licence	Bad Habits	Paihia
Off-licence	Bad Habits Wholesale	Paihia
Off-licence	Bay Liquor, Paihia	Paihia
Off-licence	Copthorne Resort Waitangi	Paihia
Off-licence	Countdown Paihia	Paihia
Off-licence	Countdown Paihia Central	Paihia
Off-licence	Kindred Spirits	Paihia
Off-licence	Kiwi Liquor Paihia	Paihia
Off-licence	Paihia 4 Square	Paihia
Off-licence	Phat House Brewery & Taproom	Paihia
Off-licence	Scenic Hotel Bay of Islands	Paihia
Off-licence	Dunndeez Bar & Bistro Ltd	Panguru
Off-licence	Houhora Four Square	Pukenui
Off-licence	Houhora Liquor Centre	Pukenui
Off-licence	Rāwene Food Mart	Rāwene
Off-licence	Bay Four Square	Russell
Off-licence	Colonial Liquor Centre	Russell
Off-licence	Duke Of Marlborough Hotel	Russell
Off-licence	Nautipenguin	Russell
Off-licence	Omata Estate	Russell
Off-licence	Paroa Bay Winery	Russell
Off-licence	Russell Fresh Supermarket	Russell
Off-licence	Sage at Paroa Bay Winery	Russell
Off-licence	Society Liquor	Russell
Off-licence	Taipa Foodmarket	Taipa
Off-licence	Taipa Tavern	Taipa
Off-licence	Towai Tavern	Towai
Off-licence	Waimamaku Four Square	Waimamaku
Off-licence	Liquor World Waipapa	Waipapa
Off-licence	Liquorland Waipapa	Waipapa
Off-licence	Waipapakauri Hotel	Waipapakauri
Off-licence	Far North Wines & Spirits	Whatuwhiwhi
Off-licence	Karikari Estate	Whatuwhiwhi
On-licence	Ahipara Bay Motel & Bayview Restaurant	Ahipara
On-licence	Awanui Hotel	Awanui
On-licence	Herekino Tavern	Herekino
On-licence	Horeke Hotel	Horeke
On-licence	Tōnui Lucid Café	Houhora
On-licence	Historic Gumstore & Bar & Grill	Kāeo
On-licence	Spice Grill	Kāeo
On-licence	Left Bank & Mint Restaurant	Kaikohe
On-licence	The Bank Bar	Kaikohe
On-licence	Beachcomber Restaurant	Kaitāia
On-licence	Collards Sports Bar, Gaming & Restaurant	Kaitāia
On-licence	Indian Spice	Kaitāia
On-licence	Kauri Arms Tavern	Kaitāia
On-licence	Mussell Rock Cafe & Bar	Kaitāia
On-licence	Orana Motor Inn	Kaitāia
On-licence	Peekaboo Backyard Eatery	Kaitāia

Type	Venue	Town
On-licence	Tuatua Tavern	Karikari Peninsula
On-licence	Hunter Star	Kawakawa
On-licence	Klondike Ale House	Kawakawa
On-licence	Burger Fiasko	Kerikeri
On-licence	Café Cinema Restaurant	Kerikeri
On-licence	Café Jerusalem	Kerikeri
On-licence	Chang Siam Thai Restaurant	Kerikeri
On-licence	Curry King	Kerikeri
On-licence	Feast Kerikeri	Kerikeri
On-licence	Ferment	Kerikeri
On-licence	Kainui Road Vineyard	Kerikeri
On-licence	Madly Indian Restaurant	Kerikeri
On-licence	Maha Restaurant	Kerikeri
On-licence	Marsden Estate	Kerikeri
On-licence	Plough & Feather	Kerikeri
On-licence	Rock Salt Bar & Restaurant	Kerikeri
On-licence	S#arp Café	Kerikeri
On-licence	Salt & Seed Private Dining	Kerikeri
On-licence	Sovrano Winery	Kerikeri
On-licence	The Black Olive Restaurant	Kerikeri
On-licence	The Homestead Sports Bar & Bistro	Kerikeri
On-licence	The Landing Lodges	Kerikeri
On-licence	The Landing Wines	Kerikeri
On-licence	The Range NZ	Kerikeri
On-licence	The Rusty Tractor Café & Trading Store	Kerikeri
On-licence	Turmeric	Kerikeri
On-licence	Turner Centre	Kerikeri
On-licence	Hokianga Harbour Hotel	Kohukohu
On-licence	Jesse's On The Waterfront Cafe & Bar	Mangōnui
On-licence	Mangōnui Fish Shop	Mangōnui
On-licence	Mangōnui Hotel	Mangōnui
On-licence	Mangōnui Wine & Whiskey Bar	Mangōnui
On-licence	Remarkable Cafe & Seafood Restaurant	Mangōnui
On-licence	The Thai Mangōnui	Mangōnui
On-licence	Kauri Cliffs Golf Course & Lodge	Matauri Bay
On-licence	Matauri Café & Bar	Matauri Bay
On-licence	Klondike Tavern	Moerewa
On-licence	Ōhaeawai Hotel	Ōhaeawai
On-licence	The Heads Hokianga	Ōmāpere
On-licence	Ōpononi Hotel	Ōpononi
On-licence	Cool Change	Ōpua
On-licence	Discovery IV	Ōpua
On-licence	Dolphin Seeker	Ōpua
On-licence	Marina Café	Ōpua
On-licence	R Tucker Thompson	Ōpua
On-licence	Roadrunner Tavern	Ōpua
On-licence	Serenity	Ōpua
On-licence	Sunkissed Gourmet Sailing Adventures	Ōpua
On-licence	Te Papahu	Ōpua
On-licence	The Rock Adventure Cruise	Ōpua
On-licence	Bad Habits	Paihia
On-licence	Breeze	Paihia

Type	Venue	Town
On-licence	Carino New Zealand	Paihia
On-licence	Charlotte's Kitchen	Paihia
On-licence	Copthorne Resort Waitangi	Paihia
On-licence	Craft, Bar And Kitchen	Paihia
On-licence	Darryls Dinner Cruises – Ratanui	Paihia
On-licence	Delhi 6 The Indian Kitchen	Paihia
On-licence	Greens - Traditional Indian Cuisine	Paihia
On-licence	Greens - Traditional Thai Cuisine	Paihia
On-licence	JFC	Paihia
On-licence	Jimmy Jacks Rib Shack	Paihia
On-licence	King Wah Chinese Restaurant	Paihia
On-licence	Kingsgate Hotel Autolodge	Paihia
On-licence	Paihia Beach Resort & Spa	Paihia
On-licence	Paihia Pacific Resort Hotel	Paihia
On-licence	Paihia Sports Bar	Paihia
On-licence	Phat House Brewery & Taproom	Paihia
On-licence	Pipi Patch	Paihia
On-licence	Pizza Shack	Paihia
On-licence	Saltwater Café and Bar	Paihia
On-licence	Sandpit Poolroom and Bar	Paihia
On-licence	Scenic Hotel Bay of Islands	Paihia
On-licence	Sea Spray Suites	Paihia
On-licence	Swordy Bistro & Bar	Paihia
On-licence	Terra Restaurant	Paihia
On-licence	The Blue Door Paihia	Paihia
On-licence	The Crafty Local	Paihia
On-licence	The Hideout	Paihia
On-licence	The Waterfront	Paihia
On-licence	Tipsy Oyster Tapas & Bar	Paihia
On-licence	Twin Pines Manor	Paihia
On-licence	Zane Greys Restaurants and Bars	Paihia
On-licence	Dunndeez Bar & Bistro Ltd	Panguru
On-licence	Pukenui Pacific	Pukenui
On-licence	The Boatshed Café	Rāwene
On-licence	Butterfish	Russell
On-licence	Duke Of Marlborough Hotel	Russell
On-licence	Eagles Nest	Russell
On-licence	Greens	Russell
On-licence	Green's Thai Cuisine	Russell
On-licence	Hell Hole	Russell
On-licence	Nautipenguin	Russell
On-licence	Omata Estate	Russell
On-licence	Reprobate	Russell
On-licence	Sage	Russell
On-licence	Seaside	Russell
On-licence	The Gables Restaurant	Russell
On-licence	The Grazing Table	Russell
On-licence	Tuk-Tuk Bangkok Restaurant	Russell
On-licence	Ramada Resort Reia Taipa Beach	Taipa
On-licence	Taipa Tavern	Taipa
On-licence	Towai Tavern	Towai
On-licence	Otehei Bay Resort	Urupukapuka Island

Type	Venue	Town
On-licence	Waimamaku Bar and Grill	Waimamaku
On-licence	Pioneer Restaurant & Bar	Waipapa
On-licence	Studio 15 Boutique Salon	Waipapa
On-licence	Waipapakauri Hotel	Waipapakauri
On-licence	Tahuaroa	Waitangi
On-licence	Whare Waka Café	Waitangi
On-licence	Karikari Estate	Whatuwhiwhi

APPENDIX FOUR – CRIMINAL OFFENCES IN THE FAR NORTH WHERE ACOHOL WAS A CONTRIBUTING FACTOR

Police records² of criminal offences where alcohol was a contributing factor (ACF offences) in the Far North are summarised below.

Table 17: Numbers of offences by calendar year

Calendar year	2020	2021	2022	2023
Total offences	2,886	2,938	2,459	2,465
Number of ACF offences	682	795	699	707
ACF offences %	24%	27%	28%	29%

Table 18: ACF offences by area unit in 2023

Area unit	Number of ACF offences	Percent
Kerikeri	99	14%
Kaitiāia West	95	13%
Kaitiāia East	72	10%
Paihia	56	8%
Kaikohe	42	6%
Taipa Bay-Mangōnui	32	5%
Waihou Valley-Hupara	30	4%
Awanui	29	4%
Motutangi-Kareponia	21	3%
Ngapuhi-Kaikou	21	3%
Karikari Peninsula-Maungataniwha	20	3%
Herekino	18	3%
Mangapa-Matauri Bay	17	2%
Moerewa	13	2%
Hokianga South	12	2%
Kawakawa	11	2%
Waitangi	11	2%
Pokere-Waihaha	11	2%
Ahipara	10	1%
Ōhaeawai	10	1%
Hokianga North	7	1%
Rāwene	6	1%
Ōmāpere and Ōpononi	6	1%
Ōpua East	5	1%
Houhora	4	1%
Ōkaihau	4	1%
Kāeo	3	0.4%
Kapiro	3	0.4%
North Cape	2	0.3%
Russell	2	0.3%
Ōpua West	2	0.3%
Kohukohu	1	0.1%
Haruru Falls	1	0.1%
Bay of Islands	1	0.1%
Inlet-Hokianga Harbour	1	0.1%
Unknown area	29	4%

² Response to OIA request from the Council received 21 March 2024

Table 19: ACF offences by type of location 2023

Type of location	Number of ACF offences	Percent
Public space	541	77%
Residential	116	16%
Other community location	19	3%
Other Location	31	4%
Total	707	100%

Table 20: Types of ACF offences 2023

Types of offences	Number of ACF offences	Percent
Traffic and vehicle regulatory	450	64%
Acts intended to cause injury	101	14%
Dangerous or negligent acts endangering persons	58	8%
Public order offences	29	4%
Property damage and environmental pollution	13	2%
Unlawful entry with intent/burglary, break and enter	12	2%
Abduction, harassment, and other offences against a person	10	1%
Offences against justice procedures, govt sec and govt ops	8	1%
Theft and related offences	7	1%
Prohibited and regulated weapons and explosives offences	4	1%
Sexual assault and related offences	3	0.4%
Illicit drug offences	2	0.3%
Homicide and related offences	1	0.1%
Robbery, extortion, and related offences	1	0.1%
Miscellaneous offences	8	1%
Total	707	100%

Table 21: ACF offences by gender 2023

Gender	Number of ACF offences	Percent
Male	550	78%
Female	156	22%
Not Available/Unknown	1	0.1%
Total	707	100%

Table 22: ACF offences by ethnicity 2023

Ethnicity	Number of ACF offences	Percent
Māori	400	68%
European	165	28%
Pacific Island	15	3%
Indian	3	1%
Asian	1	0%
Others	4	1%
Total	588*	100%

*Reduced base (excludes 'ethnicity unknown')

Table 23: ACF offences by age 2023

Age group	Number of ACF offences	Percent
10 - 19 years	64	9%
20 - 24 years	88	12%
25 - 29 years	114	16%
30 - 34 years	101	14%
35 - 39 years	89	13%
40 - 44 years	53	7%
45 - 49 years	48	7%
50 - 54 years	48	7%
55 - 59 years	47	7%
60 - 64 years	28	4%
65 and over	27	4%
Total	707	100%

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