

STATEMENT OF PROPOSAL

Draft Local Alcohol Policy (LAP)

Prepared under section 79 of the Sale and Supply of Alcohol Act 2012 and section 83 of the Local Government Act 2002

Introduction

The Dunedin City Council is proposing to make a new Local Alcohol Policy (LAP) and welcomes your feedback.

The purpose of a LAP is to ensure that the sale, supply and consumption of alcohol occurs in a safe and responsible way and that alcohol-related harm is minimised. The proposed LAP seeks to create an enabling policy that reflects community preferences, recognises the local context of Dunedin, and supports vibrant, safe communities.

A LAP allows territorial authorities to set policies relating to the licensing of alcohol premises within their district. These policies can address matters such as the location of licensed premises, maximum trading hours, and discretionary licence conditions that may be imposed to minimise alcohol-related harm.

Dunedin's current LAP came into effect on 1 February 2019 and overall is considered to be working well; having a positive effect on alcohol consumption behaviours although more can be done. Since the present LAP was made, evidence has emerged regarding the effectiveness of various measures aimed at reducing alcohol-related harm. The draft LAP builds on the existing framework by introducing targeted changes intended to further reduce alcohol-related harm while balancing the needs of residents, visitors, businesses, and communities.

Background and Local Context

Alcohol is a legal product that can contribute positively to social, cultural, and economic activity. However, excessive consumption can result in significant harm to individuals, families, and communities.

Evidence from health services, research, and licensing experience indicates that alcohol availability, outlet density, trading hours, and exposure to alcohol marketing can influence levels of alcohol-related harm. A research report carried out to help inform the Draft LAP noted that:

- The NZ Quality of Life Survey in 2024 found that 70% of Dunedin respondents perceive alcohol and drug problems, or antisocial behaviours caused by alcohol or drugs, to have been an issue in Dunedin, up from 66% in 2020.
- The New Zealand Health Survey 2023/24 indicates that Otago Region has high levels of both heavy and hazardous drinking, and the highest monthly heavy episodic drinking compared to any other region in New Zealand.

- Between 2012 and 2021 Dunedin had the highest age-standardised rate of hospitalisations wholly attributable to alcohol in the country (160 per 100,000 people).
- Between 2022 and 2024, the Dunedin Hospital Emergency Department received approximately 1,400 alcohol-related presentations annually.
- North Dunedin comprises approximately 7–8% of Dunedin's population yet accounted for between 23% and 27% of alcohol-related emergency department presentations.
- There is more than twice the off-licence density in areas of higher deprivation compared to lower deprivation areas, i.e. 0.81 off-licences versus 0.36 per 1,000 people.
- 40% of urban Dunedin is in the highest 20% of alcohol harm related crime in New Zealand per population over the 2022-2025 period.
- For the 2022-2025 period in Dunedin, Police reported 2,002 drink-drive offences and 3,255 incidents of alcohol related harm.
- ACC identified that in 2023 there were 216 claims specifically for alcohol-related harm in Otago; the second highest rate in New Zealand.

Taking this supporting information into account and engagement with key sector organisations, the proposed LAP adopts a precautionary approach, using reasonable and proportionate measures supported by available evidence to minimise alcohol-related harm across the district.

Proposal

Overall, the existing LAP is considered to have had a positive effect on behaviours associated with alcohol consumption although issues remain as noted. The proposed changes are intended to strengthen the policy's effectiveness by:

- Reducing alcohol availability in high-risk locations.
- Limiting exposure of young people to alcohol marketing.
- Supporting safer drinking environments.
- Aligning licensing decisions with community preferences.

The principal proposed changes are summarised below.

1. Licence Location – Sensitive Facilities

Status Quo

The current LAP defines a sensitive facility as:

"Any educational or recreational facility or playground likely to attract predominantly young people under the legal purchase age and any health facility."

Proposed Change

Expand the definition of a sensitive facility proximity for new licence applications to include:

- Marae.
- Places of worship.
- Addiction treatment services.
- Rehabilitation services.
- The Dunedin Central City Bus Hub.

Reason

These facilities are important community locations where exposure to alcohol-related activities may be inappropriate or increase risks for vulnerable groups. Playground has been removed to give the definition more specificity, with significant playgrounds falling under public recreational facilities.

Benefits

- ✓ Better recognition of culturally significant and community-focused facilities.
- ✓ Greater protection for vulnerable people and young persons.
- ✓ Improved consideration of alcohol-related effects when licensing decisions are made.

2. New Off-Licence Location Freeze

Status Quo

The current LAP does not prevent the establishment of new off-licence premises in particular areas.

Proposed Change

Introduce a restriction on new off-licences within:

High Deprivation Areas – areas identified using the New Zealand Deprivation Index.

Exemptions can be made if an application for an off-licence in these areas can show that the primary purpose of their business is not the sale and supply of alcohol.

Reason

Research demonstrates a strong relationship between outlet density and alcohol-related harm, particularly in higher deprivation areas and among younger populations, both relevant to Dunedin.

Benefits

- ✓ Reduces the concentration of alcohol outlets in high-risk areas.
- ✓ Limits alcohol availability.
- ✓ Supports efforts to reduce alcohol-related harm and disorder.
- ✓ Assists in protecting vulnerable communities.

3. Off-Licence Trading Hours

Status Quo

Current maximum off-licence trading hours are:

Monday to Sunday: 7.00am – 10.00pm

Proposed Change

Reduce permitted trading hours to:

Monday to Sunday: 9.00am – 9.00pm

Reason

National and local evidence indicates that extended availability can contribute to impulsive alcohol purchases and hazardous consumption.

The proposed hours are intended to reduce availability while having minimal impact on legitimate purchasing patterns.

Benefits

- ✓ Reduces opportunities for impulsive purchasing.
- ✓ Supports harm minimisation objectives.
- ✓ Maintains reasonable access to alcohol for consumers.

4. External Advertising and Promotion of Alcohol

Status Quo

There are currently no restrictions on alcohol advertising or promotion displayed on the exterior of off-licence premises.

Proposed Change

Introduce a discretionary condition so that the District Licensing Committee should prohibit external advertising and promotion of alcohol unless there is a good reason not to.

Reason

Research indicates a relationship between exposure to alcohol advertising and the early commencement of drinking, as well as heavier alcohol consumption, among adolescents.

Benefits

- ✓ Reduces public exposure to alcohol marketing.

✓ Better protects young people from alcohol promotion.

✓ Supports public health objectives.

5. Additional Off-Licence Discretionary Conditions

Proposed Change

Include discretionary conditions that the District Licensing Committee should consider imposing unless there is a good reason not to.

These conditions include:

- Limits on single-unit alcohol sales.
- Restrictions on "buy now, pay later" purchasing schemes.

A discretionary condition on alcohol sales in glass containers is also proposed that the District Licensing Committee may consider imposing:

- Restricting the sale of alcohol in specified glass containers where there is evidence of alcohol-related harm involving broken glass in the locality, a sufficient evidential link between the licensed premises and that harm, is likely to reduce the harm, is proportionate, and that the benefits outweigh the impacts on consumers and licensees.

Reason

These measures are intended to reduce excessive consumption and discourage purchasing behaviours associated with alcohol harm.

Benefits

✓ Supports responsible alcohol sales.

✓ Reduces incentives for excessive drinking.

✓ Provides greater flexibility in managing risk.

6. On-Licence Trading Hours

Status Quo

The current LAP permits on-licence premises to commence alcohol sales from 8.00am.

Closing times vary depending on location and zoning.

Proposed Changes

Opening Hours

Change the earliest alcohol sales time from:

8.00am to 9.00am

Closing Hours

Align trading hours with District Plan's Centre Zones by introducing a maximum closing time of:

1.00am for all licence holders located within those zones.

Reason

The proposed changes are intended to provide greater consistency and align licensing outcomes with planning objectives.

Restaurants and cafés may continue to operate as normal but may not sell alcohol before 9.00am.

Benefits

- ✓ Consistent approach across licensed premises.
- ✓ Reduced alcohol availability during higher-risk periods.
- ✓ Alignment with District Plan outcomes.

7. Additional On-Licence Discretionary Conditions

Proposed Change

Introduce discretionary conditions that should ~~generally~~ be imposed unless there is a good reason not to.

These include requirements relating to:

- Crime Prevention Through Environmental Design (CPTED) principles.
- Security and safety measures.
- Incident registers.
- Staff training records.

Reason

These conditions support safe licensed environments and improve compliance and accountability.

Benefits

- ✓ Improved public safety.
- ✓ Better management of licensed premises.
- ✓ Enhanced record keeping and staff capability.

8. Club Management Requirements

Status Quo

Legislation does not require clubs to have a certified manager present whenever alcohol is available for sale.

Proposed Change

Introduce a discretionary condition requiring clubs to have a holder of a manager's certificate present during busy periods unless there is a good reason not to.

The District Licensing Committee would determine when this condition should apply based on:

- The level of activity at the premises.
- The risk profile of the club.

Reason

Manager presence supports responsible service of alcohol and effective incident management.

Benefits

- ✓ Improved supervision of alcohol sales.
- ✓ Enhanced compliance with licensing obligations.
- ✓ Reduced risk of alcohol-related harm.

Other Proposed Changes

The draft LAP also includes several additional amendments:

- Aligning on-licence location provisions with the Second Generation Plan.
- Introducing discretionary conditions applicable to all licence types relating to:
 - prevention of intoxication;
 - prevention of violent behaviour; and
 - prevention of alcohol sales to prohibited persons.
- Updating definitions and terminology.
- Removing content that duplicates provisions already contained in the Sale and Supply of Alcohol Act 2012.

Options Considered

Option 1 – Status Quo

Retain the current Local Alcohol Policy without amendment.

Advantages

- ✓ No additional compliance requirements for licence holders.
- ✓ Existing arrangements remain familiar to businesses and stakeholders.

Disadvantages

- ✗ Does not respond to emerging evidence of alcohol-related harm.
- ✗ Does not address concerns regarding outlet density and alcohol availability.
- ✗ Misses opportunities to strengthen protection for vulnerable communities.

Option 2 – Adopt the Draft Local Alcohol Policy

Adopt the proposed Local Alcohol Policy with the changes outlined in this Statement of Proposal.

Advantages

- ✓ Strengthens harm minimisation measures.
- ✓ Better reflects current evidence and community concerns.
- ✓ Provides a balanced and proportionate approach to alcohol regulation.
- ✓ Supports healthier and safer communities.

Disadvantages

- ✗ May impose additional constraints on some licence holders.
- ✗ May reduce opportunities for new off-licence developments in certain locations.

Related Documents

- Draft Local Alcohol Policy.
- Summary of Information.
- Submission Form.
- Current Local Alcohol Policy.

Have Your Say

What do you think? Should the Council adopt the proposed changes to the LAP?

The Council invites public submissions on the Draft Local Alcohol Policy and the options we've set out above.

Submissions may address any aspect of the proposal, including:

- Sensitive facility provisions.
- Off-licence location restrictions.
- Trading hours.
- Advertising restrictions.

- Discretionary licence conditions.
- Club management requirements.
- Any other matter relating to the proposed LAP.

Following the consultation period, submitters will have the opportunity to present their views at a hearing before Council considers the final policy.

Where to from here?

- The public submission period is from 25 August until 5pm, 25 September 2026.
- Hearings will be held in October. During hearings, you can verbally present your position to the Councillors.
- The Council considers submissions and decides on any changes to the LAP.
- The Council may then adopt the reviewed LAP.