

ATTACHMENT A



# **LOCAL ALCOHOL POLICY RESEARCH PAPER**

Clutha District Council

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## 1 OVERVIEW

The Sale and Supply of Alcohol Act 2012 introduced several parameters for licensed premises to operate within. These apply nationally. The Act gives local authorities the option of creating a Local Alcohol Policy to address the sale, supply or consumption of alcohol within each district. The contents of a LAP are limited by the Act to only:

- The location of licensed premises
- The density of licensed premises
- Whether further licences should be issued
- Maximum trading hours
- Discretionary conditions
- One-way door restrictions.

There is no requirement under the Act for a local authority to develop a LAP.

The following summarises the information collected on alcohol licensing and alcohol harm in the community. If a specific problem with alcohol harm can be identified in the community, then the question is whether the specific mechanisms of a LAP could address this problem.

### Licences and Alcohol Control Areas

The current licence information shows a steady but comparably small number of licence applications each year in the district. The small number of hearings indicates a low amount of opposition by relevant groups to licensed premise applications.

The low number (comparably) of licences and small number of hearings required indicates the system is working well and partners are working collaboratively together.

The current latest closing times for licensed premises indicates that:

- Off licences are generally open towards the latest time allowed of 11pm (majority close at 10pm and 11pm).
- Most club licences close at 12am and 1am, before the latest closing time allowed of 4am.
- The majority of on licences close later at 2am and 3am, but only one premise is licensed to the latest allowed time of 4am.

The latest licensed closing hours indicate that it may be suitable to consider reducing club and on licence hours of operation from 4am to 1am and 3am respectively, however, a problem in a certain area of the district or across the entire district has not been indicated with closing times by partners working in alcohol regulation in the community at this time.

### **The District Plan and Other Strategic Documents**

The objectives and policies of the District Plan, other Strategic Plans and Community Plans guiding the development of the district aim to provide an amenity level in the main streets of towns that is positive and welcoming. Mismanagement of licensed premises could detract from this aim.

The alcohol control areas in place for Balclutha and Milton main streets should address the majority of main street issues relating to alcohol management in these towns.

Maximum trading hours may impact on the amenity of surrounding residential neighbours and the 'image' of a town. Hours of operation for non-residential activities are not currently limited by the District Plan if a licence under the Sale of Liquor Act 1989 is required for that activity. This could be addressed when the District Plan is updated, however, currently the location and general management of licensed premises has not been cited by partners in the community as a specific issue that needs to be addressed.

### **Demographic Profile**

The population growth in Clutha is currently gradual and tourism spend is relatively low.

If population and tourism growth increases, demand for alcohol related industries in relation to these could be monitored for any potential flow-on to increased alcohol related harm.

### **Health Profile**

Health indicators from the Southern DHB give conflicting information about the need for a LAP in Clutha. Hospital admissions related to alcohol indicate the problem is as bad as any place in New Zealand, which could be lessened by a LAP, however no specific policy methods were indicated by Southern DHB analysts. Conversely the Medical Officer of Health for the Southern DHB compares Clutha to the Waitaki District and describes the system as working well with a low number of licences and a low number of problems relatively speaking.

Although harm was indicated by the hospital admission statistics, the Medical Officer for Health, who works in several districts in coastal Otago sees the system for minimising alcohol harm in the Clutha District as working well and does not think a LAP will be of any benefit currently.

### **Crime Profile**

The crime statistics indicate a steady amount of alcohol related offences in the district. Direct comments from the Alcohol Harm Reduction Officer do not see the issues in Clutha as particularly bad. Issues have been targeted previously (e.g. drinking after rugby matches) or dealt with when individual premises apply to renew their licences. This seems to be working well currently. A sharp increase in applications, especially liquor stores, could be a problem but this has not yet occurred.

Alcohol related offences appear to be steady in the district however, the Alcohol Harm Reduction Officer feels alcohol 'problems' are currently being managed well with the participation of an engaged community and cooperative licensing system partners.

Increases in the amount and/or type of applications (e.g. off licence liquor stores) could be monitored.

#### **District Licensing Officer and District Licensing Committee**

Clutha's District Licensing Officer and the District Licensing Committee have similar comments to the Police. The system seems to be working well and as problems arise with individual premises solutions have been found relatively cooperatively. New applications have generally been very gradual, but a change in this was also indicated as a potential problem, although at this time this has not occurred.

The licensing system appears to be working well.

Increases in the amount and/or type of applications (e.g. off licence liquor stores) could be monitored. Distance to sensitive uses and density of premises may be beneficial to impose if the number of new applications received in the district increased.

#### **Surrounding Councils Local Alcohol Experiences**

Just under half of the local authorities surrounding the Clutha District have actively chosen not to develop a LAP for their districts. These authorities have chosen this option as they did not perceive themselves to have alcohol harm management issues or issues that could be dealt with by what you can address in a LAP. These councils noted that they had difficulty sourcing local data that would support the development of a LAP and that the cost of developing a LAP outweighed any benefit it may deliver. Many of these authorities were smaller, and thought that their Licensing Officers, District Licensing Committees, the Police and Medical Officer of Health worked effectively together to address any problems locally on a licence-by-licence basis.

It was noted by most of the surrounding councils that were consulted with and in the literature on developing LAP's that the cost of developing them can be prohibitive because of the appeal mechanisms included in the Act. Speaking with other local authorities they thought these appeals were often in relation to reduction of trading hours especially for off licence premises.

One of the surrounding local authorities who had a LAP in place could not articulate any difference in the management of excessive alcohol consumption and reduction of harm if the LAP were not operating in the area, although they saw it as a positive guide to have in place.

One council that had a LAP in place noted that a lot of the information contained within it was confusing and unenforceable but noted that the reduction in trading hours was seen as a win.

Although other councils surrounding the Clutha District had actively chosen to not pursue a LAP because of the high time and cost associated with potential appeals, Gore District Council noted in discussions that they received no opposition to their recent LAP. Their current LAP is basically a roll-over of the previous LAP with some fine tuning. Gore also has a licensing trust which has a monopoly over the development of premises licensed for the sale of alcoholic beverages and associated accommodation in an area. This applies to both on licence and off licence sales. Clutha differs from Gore in this regard as there is no LAP currently in place in Clutha and the licensing trusts operating in the district do not have a monopoly.

Experiences of surrounding local authorities were varied, but overall, the licensing and management of alcohol in the Clutha District seemed most comparable to surrounding smaller councils who had actively chosen not to pursue the development of a LAP due to not believing they would benefit from it greatly and the potential cost of the process, specifically potential appeals.

## 2 Purpose and Scope

The purpose of this report is to identify key trends in relation to alcohol in the Clutha District and to inform the decision to consider a developing a LAP for Clutha.

This report aligns with the requirements of the Sale and Supply of Alcohol Act 2012 s78(2), s95 and s97.

This report includes an overview of background information and Clutha's:

- Current licensed premises and alcohol control areas.
- District plan and other strategic documents.
- Demographic and tourism profile.
- Health profile.
- Crime profile.
- District Licensing Officer and District Licensing Committee comments.
- Surrounding councils' LAP experiences.

## 3 Background

### 3.1 Legislation

In December 2012 the Sale and Supply of Alcohol Act 2012 came into force.

The object of the Act under s4(1) is that:

- (a) *the sale, supply, and consumption of alcohol should be undertaken safely and responsibly; and*
- (b) *the harm caused by the excessive or inappropriate consumption of alcohol should be minimised.*

### 3.2 What is a licence?

A licence allows the holder to sell alcohol. There are four types of licence and each has specific criteria attached to it by the Act, as summarised in the following table.

Licence Type	Examples	Description
<b>Off Licence</b>	Bottle store, supermarket	The sale and supply of alcohol to be consumed away from the premises e.g. at home, at a BYO.
<b>On Licence</b>	Pub, restaurant, café	The sale and supply of alcohol for consumption at the premises, including outdoor areas.
<b>Club Licence</b>	Sports club, RSA, working men's club	The sale and supply of alcohol for consumption at the club premises and only to members, affiliates, and guests of the club.
<b>Special Licence</b>	Festivals, weddings in Council halls	The sale of liquor at special events. It may be used to extend operational hours or to licence one-off events.

### 3.3 What is a Local Alcohol Policy?

The Sale and Supply of Alcohol Act empowered territorial authorities to develop Local Alcohol Policies (LAPs) which licencing decision-makers are required to consider.

One of the key drivers behind the Act was an increased focus on local decision making relating to alcohol including tailoring some of the new national provisions, such as maximum trading hours, to local circumstances.

Under s75 of the Act a territorial authority may have a local policy "relating to the sale, supply, or consumption of alcohol within its district", but no local authority is required to have a LAP.

Section 77 of the Act outlines what policies a LAP may contain relating to licencing (and no others) including:

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



Under s78 of the Act, any territorial authority who wishes to have a LAP must produce a draft policy. Section 2 states that the draft must have regard to:

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

The Act also notes that:

- *A district's residents include people who have holiday homes there.*
- *The authority must not produce a draft policy without having consulted the Police, inspectors, and Medical Officers of Health, each of whom must, if asked by the authority to do so, make reasonable efforts to give the authority any information they hold relating to any of the matters stated in subsection (2)(c) to (g).*

The Act requires a special consultative procedure be followed to consult on a draft policy. Rights of appeal exist against any provisional LAP a territorial authority wishes to adopt and are set out in the Act.

### 3.3.1 Hours of operation

A LAP can set the maximum hours of operation for different licence types. If there is no policy on maximum trading hours, then the default hours of operation of the Act apply as follows.

Licence type	Default maximum trading hours under the Act
Off Licence	7am and 11pm on any day
On Licence	8am on any day and 4am on the next day
Club Licence	8am on any day and 4am on the next day

### 3.3.2 Discretionary conditions

Several sections under the Act specify the types of conditions that can be considered and imposed on the different types of licences. A LAP can include a list of conditions that the DLC can consider at its discretion when issuing a licence. Conditions must be consistent with the Act (safe and responsible sale, supply and consumption of alcohol and minimising harm caused by excessive or inappropriate consumption of alcohol).

The DLC can consider these conditions (or others) with or without a LAP. The inclusion of them may provide a direct link between the community's local aspirations for alcohol management and the ongoing decisions of the DLC, promote the purpose of the Act and/or foster a better working relationship between Councils and industry providers.

Examples of discretionary conditions that other councils have included in their LAPs follow:

<b>Premise layout and design</b>	<ul style="list-style-type: none"> <li>• Design and layout requirements.</li> <li>• Minimum seating requirements.</li> </ul>
<b>Staffing</b>	<ul style="list-style-type: none"> <li>• Training requirements for staff.</li> <li>• Management requirements in relation to staff (e.g. number of staff, duty managers).</li> <li>• Prescribed ratio of security staff to patrons and provision of additional qualified security staff at specified time/s.</li> <li>• Uniform requirements (e.g. high visibility vests for security staff).</li> <li>• Certified manager to be on duty at club-licensed premises, excluding chartered clubs.</li> <li>• When alcohol is being sold or supplied during higher risk periods that are determined by the committees.</li> </ul>
<b>Host responsibility</b>	<ul style="list-style-type: none"> <li>• Adopt a host responsibility policy.</li> <li>• Queue management.</li> <li>• Provision of food, non-alcohol and low-alcohol drinks.</li> <li>• Management of an event in such a way as to reduce abuse of alcohol.</li> <li>• Availability of transport home for patrons or information about transport options.</li> <li>• Display of safe drinking messages/material.</li> <li>• Limit on the type and/or size of drinks and the number of drinks per customer after a specified time.</li> <li>• Limit the use of glass drinking receptacles at specified times.</li> <li>• Any other matter that can encourage responsible alcohol sales, supply and consumption.</li> </ul>
<b>Amenity and good order</b>	<ul style="list-style-type: none"> <li>• Cleaning the outside of the premises and immediate environs.</li> <li>• Use of CCTV.</li> <li>• Signage and advertising.</li> <li>• Display of external promotion and advertising – including the percentage of store front covered, type of material used.</li> </ul>
<b>Management of incidents</b>	<ul style="list-style-type: none"> <li>• Licensee to keep a register of incidents.</li> <li>• Mandatory notification to Police of violent incidents.</li> </ul>
<b>Utilising CPTED principles</b>	<ul style="list-style-type: none"> <li>• CCTV in suitable locations for monitoring purposes.</li> <li>• Effective interior and exterior lighting.</li> </ul>
<b>Individual premise policies</b>	<ul style="list-style-type: none"> <li>• The people to whom alcohol may be sold.</li> <li>• The sale of alcohol to prohibited persons.</li> <li>• The kind of alcohol that may be sold.</li> <li>• Adopt noise control management plans.</li> <li>• Adopt risk management plans.</li> </ul>

## 4 Current Licence and Alcohol Control Areas Profile

### 4.1 Current licences

Currently there are 76 licenced premises in the district (17 May 2021). This is made up of 22 on-licences, 24 off-licences and 30 club licences.

Licences are typically issued initially for 1 year then are renewed every 3 years.

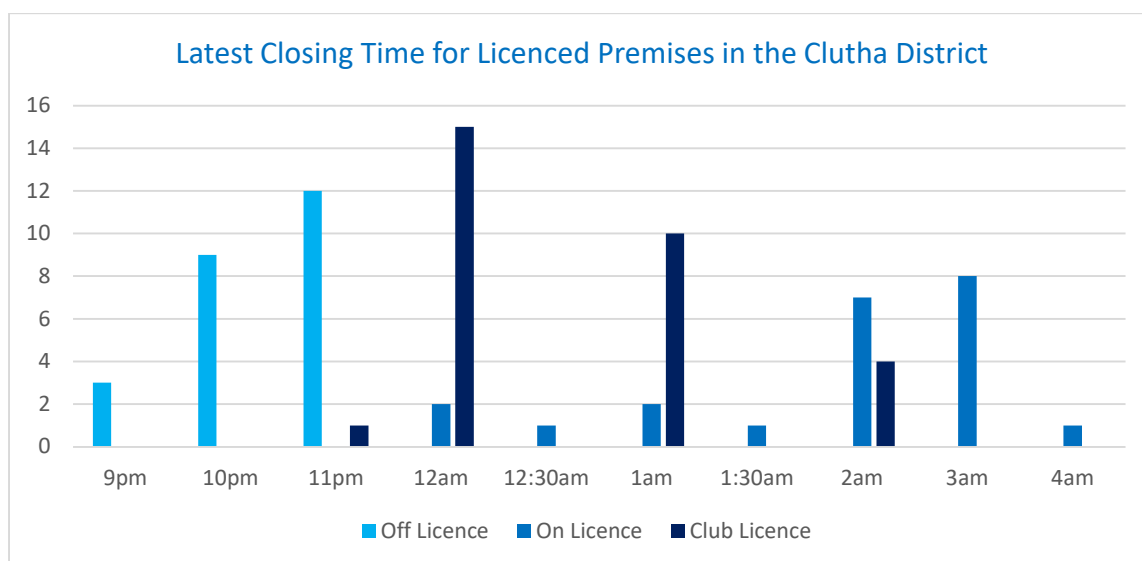
Statistics for liquor licensing activity in the past three years in the Clutha District are summarised in the following table.

Clutha Liquor Licensing Summary 2018 to 2020				
	Licences (On, Off and Club)	Special Licences	Managers Certificates	Temporary Authorities
2018	42	145	70	9
2019	18	153	97	1
2020	25	122*	81	4

\*19 Special Licences were cancelled due to Covid-19 in 2020, so were started but not issued.

The latest closing times for the current on, off and club licenced premises in Clutha are summarised in the following graph. In summary, the graph shows that latest closing times for:

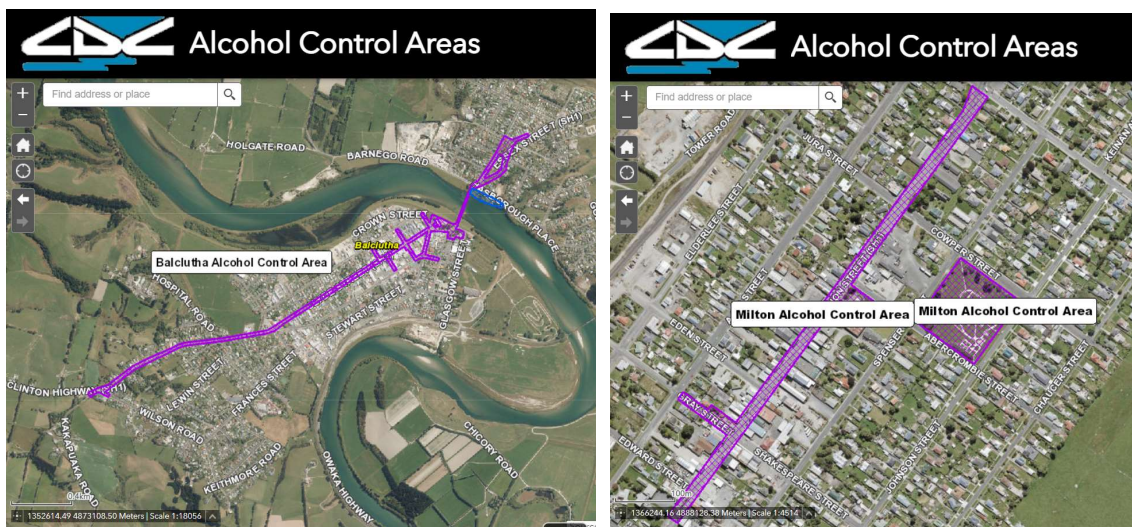
- Off licences are spread between 9pm and 11pm, with the majority closing at 10pm or 11pm.
- On licences vary between 12am and 4am, with the majority closing at 2am or 3am.
- Club licences range from 11pm to 2am, with the majority closing at 12am or 1am.



In the past 3 years there have been five hearings held by the District Licencing Committee for seven premises as there has been opposition to the licence being issued. Two further hearings are anticipated this year but are not yet scheduled.

## 4.2 Alcohol control areas

The Clutha District Council Regulatory Bylaw 2018 includes alcohol controls (Part 7). Specifically, two areas, one in Balclutha and one in Milton, have 24 hour 7 days a week alcohol control (or 7 days a week during the hours of darkness in the case of the Arthur Strang boat ramp area, shown in blue). The extent of the alcohol control areas is depicted in Appendix A of the bylaw and in the below maps, which are excerpts from Councils GIS mapping (see [https://gis.cluthadc.govt.nz/CluthaMaps/Gallery/Alcohol Control Areas](https://gis.cluthadc.govt.nz/CluthaMaps/Gallery/Alcohol%20Control%20Areas)).



Alcohol control areas are required to be reviewed in the same manner as bylaws, that is 5 years after they are first created then every ten years after this.

## 5 The District Plan and Other Strategic Documents

The Clutha District Council District Plan (1998) is an effects-based plan. This is evident in the zoning applied to the towns in the district which only distinguishes two 'zones', an Urban Resource Area (URA) and an Industrial Resource Area. The types of activities allowed in the URA are based on the effects of activities, rather than the activity itself, other than the distinction of residential and non-residential activities. The focus of the URA is maintaining, or where possible improving, the amenity of the area.

The location of most licensed venues is in the town centres throughout the district. The District Plan conveys the subject of Clutha's town centres in 'the issues' section of the URA as follows.

- *Inappropriate development can lead to unsustainable management of the physical resources contained in the District's town centres.*
- *The resources and amenities of the business areas of the district's towns convey that particular towns image and this can be adversely affected by some activities.*

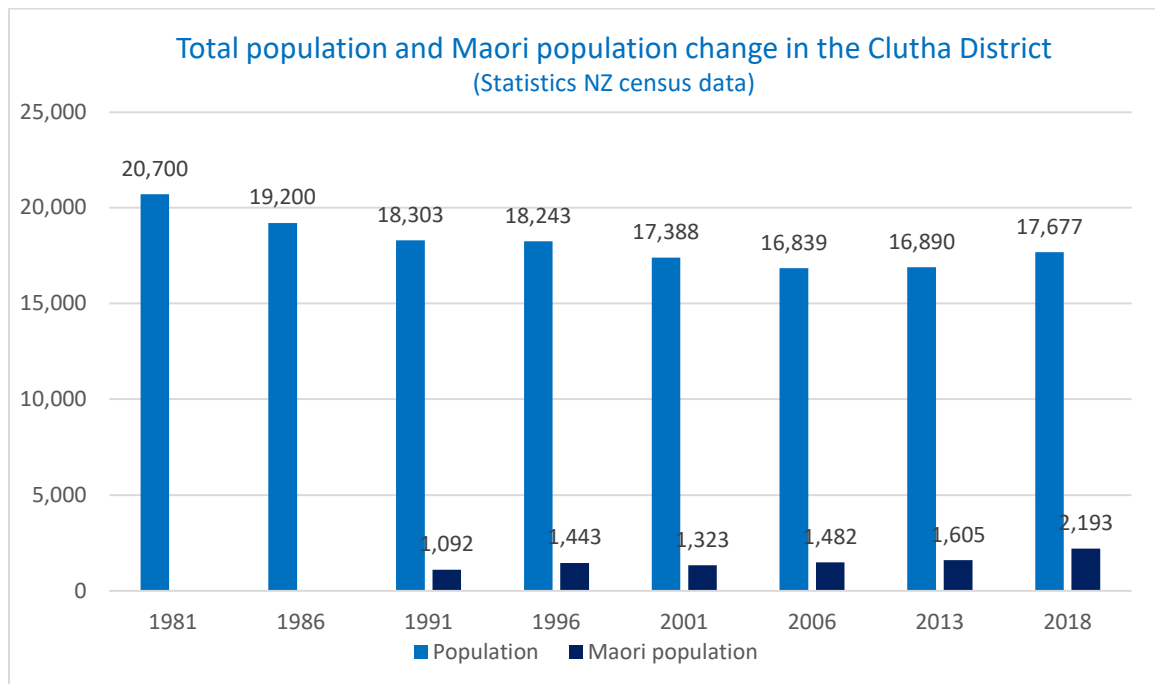
In relation to other plans, to maintain the town centres as a ‘focal point’ and ‘conveying an image of a town’ the Council has developed an Economic Strategy and a Living and Working in Clutha Strategy (both 2015) and has more recently created community plans for Balclutha, Milton, Waihola and The Catlins and is completing plans for Lawrence and Kaitangata. The focus of these plans resonate the District Plan to upgrade and beautify main streets and entranceways to towns.

The management of licensed premises is linked to the aim of these plans and strategies to provide a positive welcoming entrance and focal point and image of each town for residents and visitors to the district through the town centres. The hours that licensed premises are able to operate may have an impact of Clutha’s urban areas. Although these premises are generally located in the ‘main street’ or ‘town centre’ they may be very close or surrounded by residential activity. The maximum trading hours may impact on the amenity of surrounding residential neighbours and the ‘image’ of a town.

In the URA non-residential activities that adjoin a residential activity have their hours of operation limited from 7am to 10pm every day. This rule does not however apply to activities for which a licence under the Sale of Liquor Act 1989 is required.

## 6 Demographic and Tourism Profile

The total population of Clutha has increased gradually since 2006, to a total of 17,677 persons. A high percentage of the population growth could be attributed to growth in the Maori population. Since 2006 there has been an increase of 711 Maori persons in the Clutha District to a total of 2,193 persons. This population increase shows a recent reverse of the slow population decline that had been occurring in the previous 15 years in the district as shown in the following graph.<sup>1</sup>



<sup>1</sup> Note that separate Maori population data for Clutha is not available prior to 1991.

The age structure in the district shows a median age in Clutha is 42.6 years, this is slightly higher than the national median age of 37.5 years. This contrasts with the median age of Maori persons in Clutha of 26.3 years (2018 NZ census data).

Clutha does not have a large tourism industry. The annual tourism spend in the Clutha District (MBIE 'Annual Tourism Spend' for 2020) was estimated to be \$56 million in 2020, although the numbers for 2020 are caveated because of changes to the industry from Covid-19. Clutha's tourism industry focuses on areas of scenic beauty such as Nugget Point and The Catlins and heritage such as gold mining and the Clutha Gold Cycle Trail in Lawrence. Tourism in Clutha may involve short stays or driving through to surrounding tourism hotspots. Clutha is part of the Southern Scenic Route.

Much of the tourism annual spend in Clutha is attributed to retail sales (\$36m) [*which can be broken down further to fuel and automotive \$16m; alcohol, food and beverages \$13m; and other retail \$7m*]. The remainder is spent on accommodation services (\$7m), other tourism products (\$3m), other passenger transport (\$1m) and cultural, recreation and gambling services (\$1m).

The gradual population growth and relatively low annual tourism spend and stays does not raise any alcohol harm red flags, however, continued population and tourism growth may increase demand for alcohol related industries, which may then have a flow on effect to increased alcohol harm.

## **7 Health Profile**

Health statistics for Clutha relating to alcohol harm were requested from the Southern DHB. Some information was provided on hospital admissions in Clutha that were alcohol related, however, the analyst cautioned that the actual numbers in Clutha were so small that it may infringe privacy laws by releasing them. General comments from the Southern DHB were that alcohol harm statistics in Clutha were comparable to surrounding local authorities and the rest of New Zealand with 4% to 5% of all hospital admissions in Clutha for the past 3 years attributable to alcohol harm. This was comparable to Dunedin or almost anywhere else in New Zealand, and they considered demonstrated a problem with alcohol harm in the community.

The delegated Medical Officer of Health from the Southern DHB for the coastal Otago area, which covers from Waitaki to the Catlins was also contacted. He generally felt that LAPs were a waste of money for what they could achieve and thought alcohol control areas were much more effective in controlling alcohol harm. In his work across several local authorities in coastal Otago he felt Clutha was very similar to the Waitaki District in terms of the types of licensed premises. His opinion was that Clutha is quite small and therefore has a small number of licensees and few problems. Any problems are with individual premises and are addressed through the good relationship between the licensees, licensing officers, Police, Medical Officer of Health and the District Licensing Committee. When problems cannot be resolved hearings occur, but he felt there were very few required in Clutha.



## 8 Crime Profile

The New Zealand Police have provided alcohol harm data for Clutha. Alcohol related offences may include offences like drink driving, breach of the peace, disorder, and others. Statistics for the past three years show a steady number of offences. Police indicate that not all alcohol related behaviour is necessarily recorded or charged with an offence, so statistics provide insight but not necessarily the entire picture of alcohol harm in the community.

	2018	2019	2020
<b>Alcohol related offences in the Clutha District</b>	174	193	173

Discussions with the Alcohol Harm Reduction Officer for Clutha from his day-to-day experience on the ground is that overall Clutha doesn't have a bad alcohol problem. He understood that there used to be more of a problem with alcohol harm in the area and this was mostly linked to heavy drinking after rugby games. This was addressed and a lot of this behaviour has reduced. He noted there had been some recent trouble with bars after 3am. The hours of these bars have been reduced (through the DLC) and the problems have stopped. He thought the Clutha Licensing Trust was good to deal with and addressed problems that are raised with them, including reducing licensed hours. Current problems are mostly with individuals in the community with a 'rural drinking attitude' rather than any particular licensed premises or the district as a whole.

The Officer described the Clutha community as quite tight knit so when they see a problem, they normally rally around to oppose it. He did note that if there were an influx of new bottle stores, density could be an issue. But did not see the same issue with supermarkets.

As a general comment the Officer did recognise that it is a problem to get supporting evidence in smaller towns. Noting that often a common-sense approach is used to deal with problems, but if nothing is recorded it is hard to follow up or refer back to in the future.

## 9 District Licensing Officer and District Licensing Committee

The Licensing Officer for Clutha District Council (contracted to Invercargill City Environmental Services Team) noted that specific problems can arise with individual premises owners or different seasons can bring problems e.g. rugby season. Generally, however her experience was that problems are identified and addressed promptly by the licensing officers and Police.

As mentioned previously in this item, in the past 3 years the DLC has held four hearings for six premises whose licence applications were opposed by the Police, Medical Officer of Health and/or District Licensing Officer. Three further hearings are anticipated but have not yet been scheduled.

Discussions with the Chairperson of the District Licensing Committee (DLC) give insight into the licence and hearing side of the system in Clutha. He believes the system is

working well but noted that they are very dependent on the relationship between the Police and the licensing officers. The Chairperson noted that issues that are brought before the DLC include closing times of on licences and they are reliant on the Police raising issues. He also clarified that not many applications go to a hearing and although there have been quite a few recently, this was just a coincidence. He also noted that the Police have been imposing a 6-hour maximum for special licences in the district and was not sure exactly where this has come from, but this can sometimes be difficult for applicants.

The Chairperson confirmed that not many new premises are received in Clutha, but currently there is a new supermarket being established in Balclutha (Countdown) and a new liquor store application (independent) in Milton. The NZ Police are opposing the liquor store application due to density and location to sensitive activities. He believed that density of premises and location criteria (like the gambling policy) to do with distance to sensitive uses for new premises may also be something that could be relevant to a LAP when considering these new current applications.

## 10 Surrounding Councils Local Alcohol Policy Experiences

The Clutha District Council had begun investigations into a LAP in 2014, noting that they were monitoring what other councils were doing in this space between 2012-2014 after the Act came into force. Although these investigations did not go any further at this time, the experiences of surrounding councils are still considered a relevant factor to consider.

The LAP experiences of the seven other local authorities in Otago and Southland were considered. The following table outlines what each surrounding council has in place currently.

Local Authority	Local Alcohol Policy	LAP Details
Central Otago	No LAP	n/a
Dunedin	LAP dated February 2019	Trading hours. Discretionary conditions.
Gore	LAP dated February 2020	Evidence of consultation with sensitive premises. Trading hours. Social impact statement. Discretionary conditions.
Invercargill and Southland	Joint LAP dated March 2020	Trading hours. Discretionary conditions.
Queenstown Lakes	No LAP	n/a
Waitaki	No LAP	n/a



Discussions with licensing staff at each local authority gave some insight into why they did not have a LAP or if they did, what the process was like to implement it and how effective it was in reducing alcohol harm in the area.

Comments from the local authorities without a LAP included:

*"...The process of creating a LAP was going to be difficult and not really deliver the benefits to the community. Everything taken out in the appeals process. Is it going to make any difference to what the DLC can do – the answer was no" (Central Otago).*

*"Not practical for us. Costs outweigh any benefits. Don't have a big problem. 450 licences currently who generally 'toe the line' so no need for LAP" (Queenstown Lakes).*

*"Initially the Council decided it would wait and see what happened with surrounding Councils adopting LAP's regarding appeals and the cost involved. More recently the Council has discussed having a LAP again. In discussions between the District Licensing Committee and the Police it was agreed that they did not have enough of a problem to warrant a LAP. Any problems with specific venues were seen to be better dealt with by specific conditions of licences rather than an overall LAP approach. The hours that premises operate in Waitaki does not warrant needing to restrict the hours any further. The Council also struggles to collect enough consistent local data to support a LAP" (Waitaki).*

Comments from the local authorities with a LAP included:

*"Originally had a joint policy with Southland/Invercargill. Councillors decided they wanted to do our own one this time. Basically, rolled over the previous policy, but only the bits that applied to Gore. No opposition to the LAP. 99% of the district covered by the MLT. Don't get many new premises. Mostly special licences. Most premises just operate within the hours prescribed anyway. No conglomeration of bottle stores. Supermarkets don't sell alcohol. No night clubs". Would it be any different in the district if there was no LAP? "Probably not. Although we have it and it does no harm. May be different if the MLT was not a monopoly". (Gore)*

*"A few wins in the policy like reduced hours for on licence (3am) and club hours work well. There was a lot of good information provided by the Police and MoH during the process. The reduced trading hours were the win in this case. Everything else a waste of time. Lots of problems with the details in the policy. Non-specific wording impossible to enforce etc. The process was long and convoluted" (Dunedin).*

*"The process was quite a big process to go through. The feedback from the community consultation on what they thought were the problems and what should be done about them was very valuable" (Invercargill and Southland).*