

# Local Alcohol Policy

## Supporting Information and Rationale

Marlborough District Council has decided to develop a Local Alcohol Policy (LAP) to assist with ensuring the supply and sale of alcohol is undertaken safely and responsibly to minimise alcohol-related harm in this region.

LAPs set out a framework for consistent decision-making and provide guidance and a greater certainty for those seeking to obtain or renew a licence, as well as communities wanting to have a say in relation to the availability of alcohol in their local area.

The 2023 amendment to the Sale and Supply of Alcohol Act 2012 has removed the ability for a LAP to be appealed if the correct process, in its development, has been followed. This has made the development of the LAP to be less lengthy and costly.

There is a prescribed process in both the Act and the Regulations that TAs must follow when developing the LAP. This process has been followed. Police and the Medical Officer of Health for Marlborough have long sought an LAP and have been consulted and involved in the process of its development.

The demography of Marlborough has also been considered along with the special character of Marlborough as a premium wine region of New Zealand. The Policy has the focus of minimising alcohol-related harm while still allowing economic growth in Marlborough.

### 1. Licensing Statistics

#### 1.1 Number of licences

As of 30 January 2025, the Marlborough district has the following number of current licences:

On Licences: 142	
BYO Restaurant	1
Cinema	1
Class 1 Restaurant	9
Class 2 Restaurant	8
Class 3 Restaurant	36
Function Centre	7
Hotel	18
Other	24
Tavern	25
Cellar Door	13

Off Licences: 136	
Grocery	5
Hotel	1
Bottle Store	6
Other	7
Remote Sales Only	71
Supermarket	6
Tavern	14
Cellar Door	26

Club Licences: 32	
Class 1 Club	0
Class 2 Club	3
Class 3 Club	29

## 1.2 Current Licensed Hours

On Licence Latest Time	Number
From 2.00 am – 3.00 am	9
Before 2.00 am	133

Off Licence Latest Time	Number
From 10.00 pm – 11.00 pm	16
Before 10.00 pm	120

Club Licence Latest Time	Number
From 2.00 am – 3.00 am	0
Before 2.00 am	32

## 1.3 Special Licences

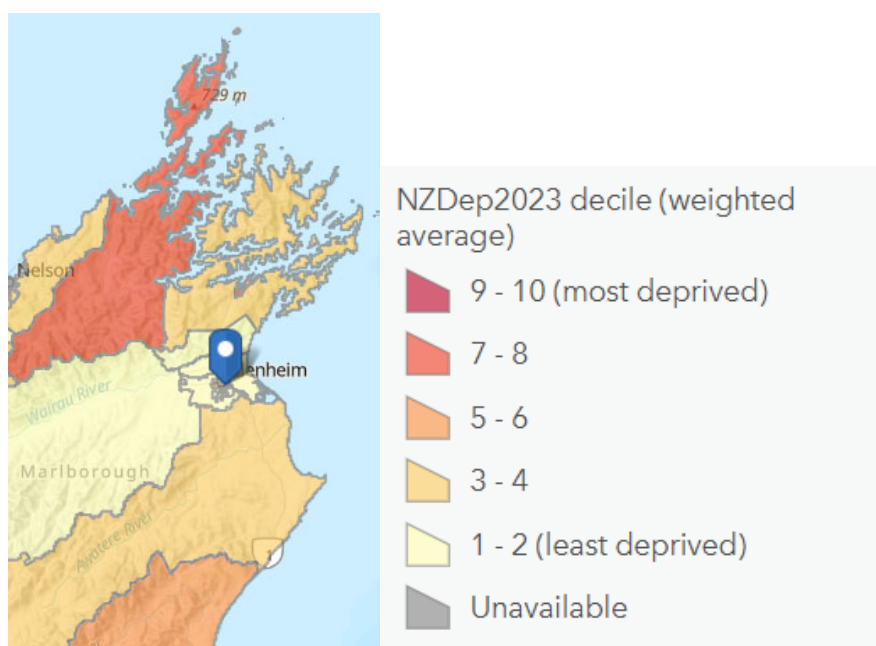
167 Special Licences were issued during the 2024 calendar year.

## 2. Community Demographics

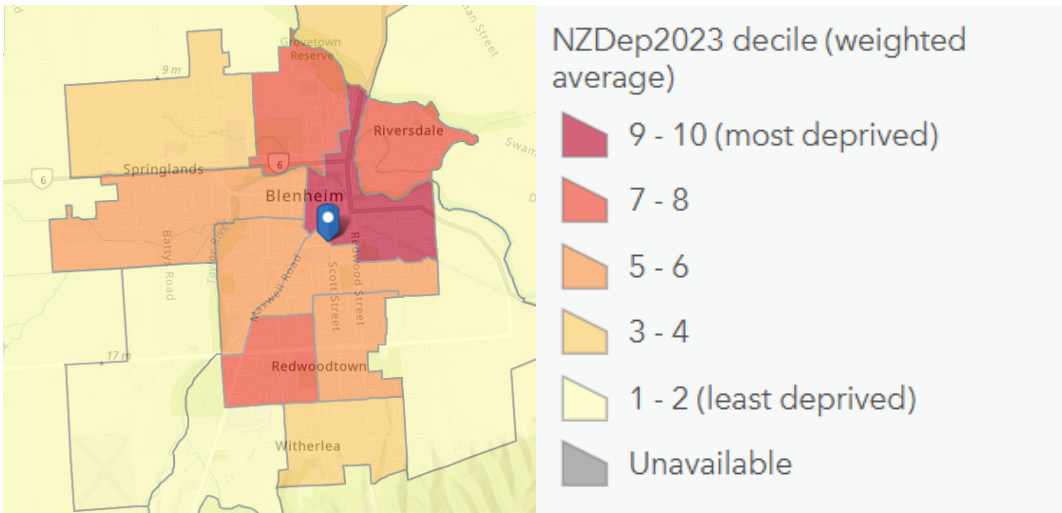
(Information supplied by Statistics New Zealand (2023 Census).

- Usual resident population: 49,431
- Median age: 46.1
- Total dwellings: 24,807  
(at the 2018 census 15% of these were unoccupied so potentially some were baches).
- Ethnic group:
  - European: 42,450 (85.9% of total population)
  - Māori: 7,344 (14.9% of total population)
  - Pacific peoples: 1,821 (3.7% of total population)
  - Asian: 2,667 (5.4% of total population)
  - Middle Eastern, Latin American, African: 738 (1.5% of total population)
  - Other: 744 (1.5% of total population).

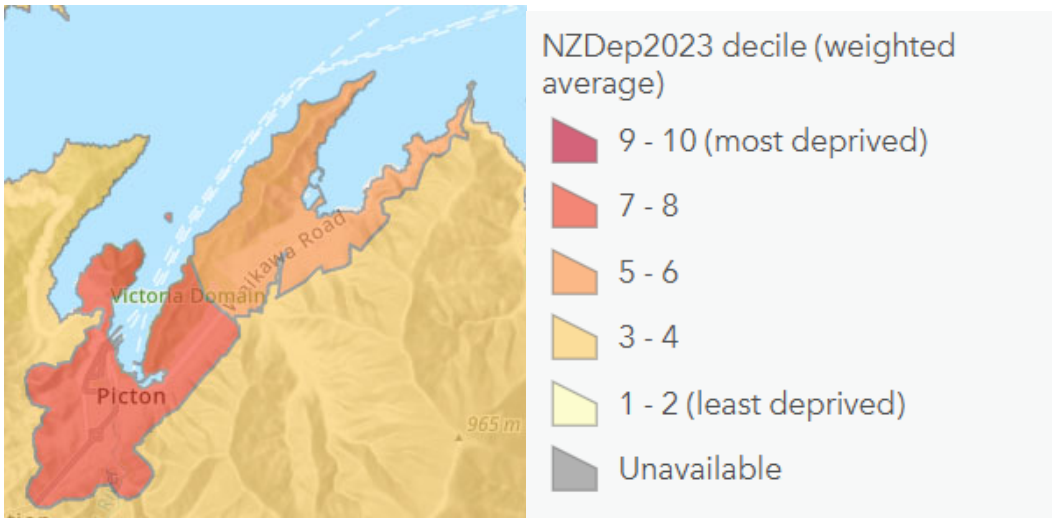
The New Zealand Index of Deprivation shows that Marlborough has a wide range of deprivation areas from 1-2 (least deprived) through to 9-10 (most deprived). <https://www.ehinz.ac.nz/indicators/population-vulnerability/socioeconomic-deprivation-profile/#nzdep-for-2023-nzdep2023>



Blenheim has a wide range of deprivation areas:

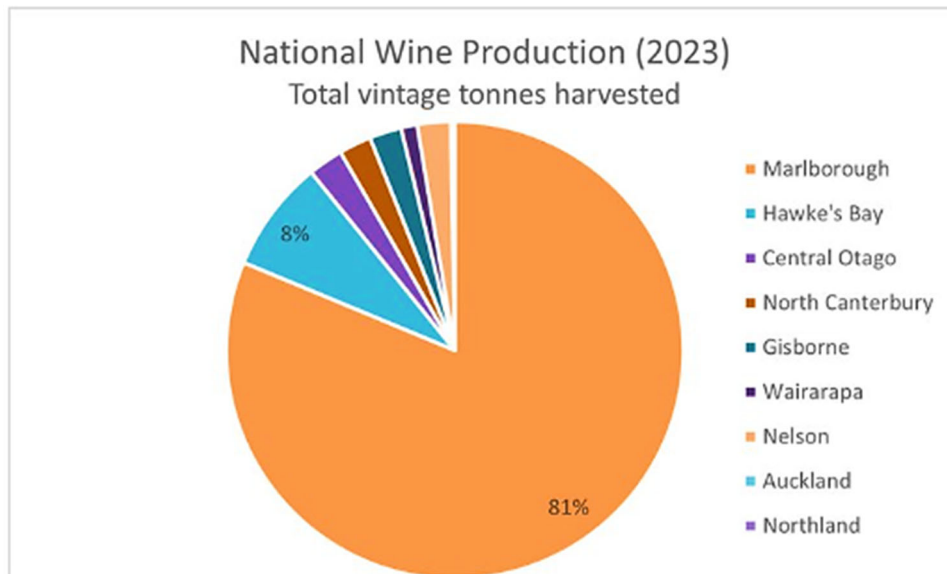


Picton is mostly deprivation 7-8 with Waikawa being 5-6



### 3. Economic Information

Marlborough is recognised as a premier wine producing region in New Zealand. This is due to Marlborough providing 70% of the national wine producing area and approximately 80% of New Zealand's wine.



In 2021, the Marlborough wine industry accounted for 18% of the region's economy with a gross output of \$571 million (<https://nzwinedirectory.co.nz/marlboroughs-wine-industry-contributes-571-million-to-local-economy/>).

Tourism expenditure — Marlborough (compared to New Zealand in general) shows that retail sales of alcohol, food and beverages provide the majority of tourism expenditure in Marlborough (infometrics.co.nz).

Spending Category	New Zealand	Marlborough
Accommodation services	8.4%	9.7%
Food and beverage services	16.7%	15.3%
Retail sales – alcohol, food and beverages	8.9%	23.5%
Retail sales - other	24.4%	15.7%
Other tourism products	11.8%	7.2%

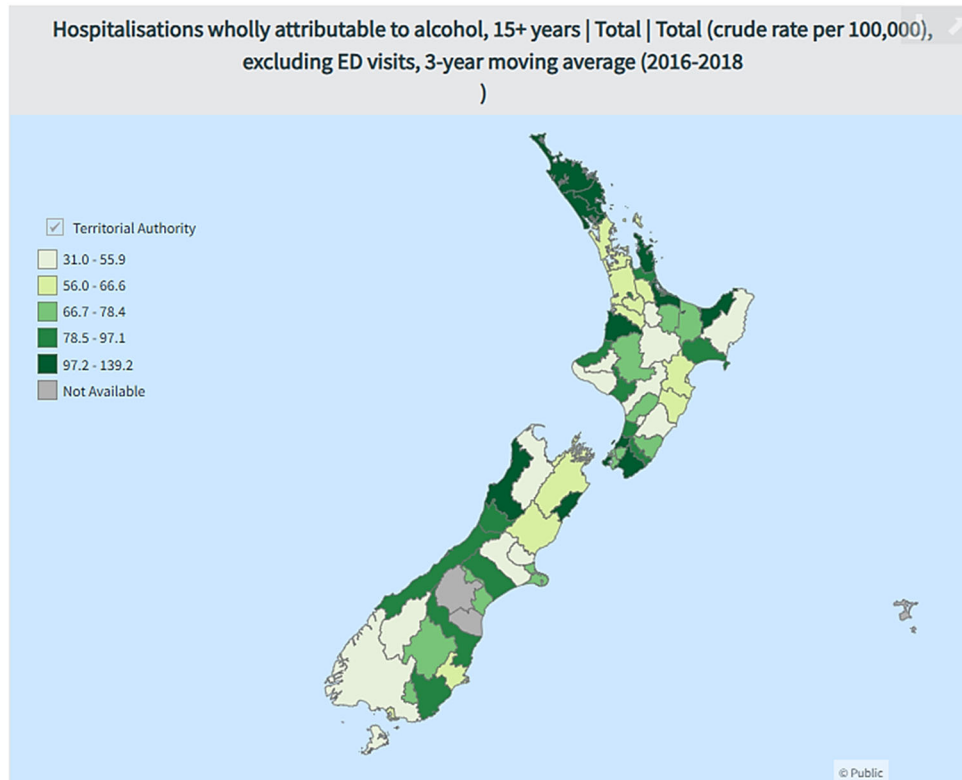
One fifth of Marlborough's workforce is employed directly or indirectly on the wine section (NZIER Report Contribution of Winegrowing to the Marlborough Economy 2020).

## 4. Alcohol Harm Statistics

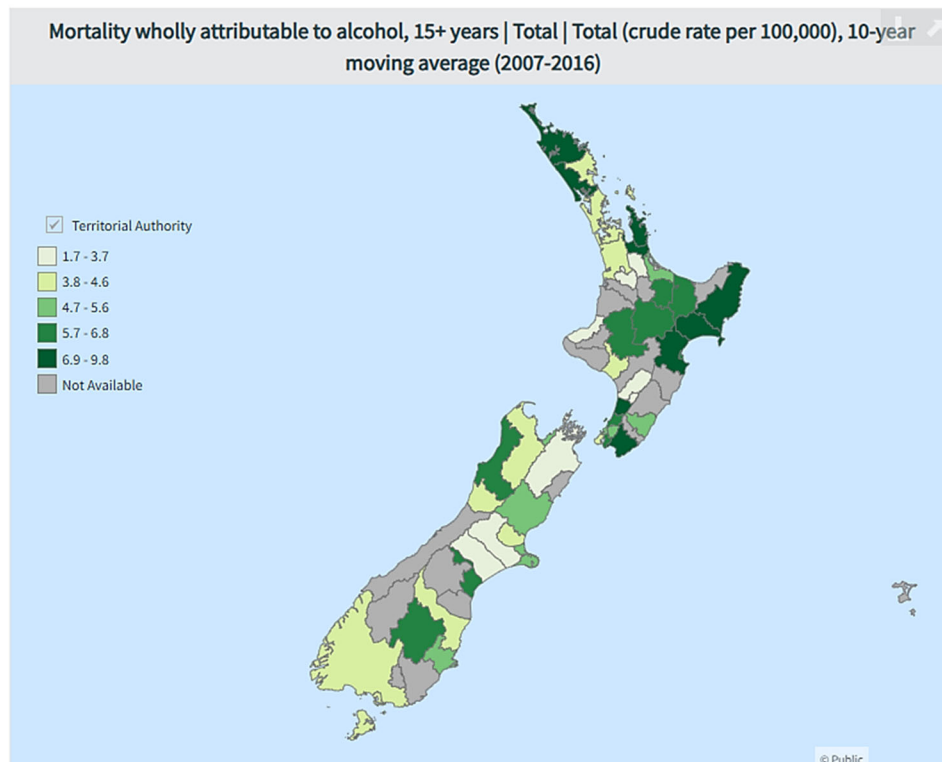
### 4.1 National Comparison Data

<https://www.ehinz.ac.nz/indicators/alcohol-related-harm/alcohol-related-harm-data/>

Hospitalisations wholly attributable to alcohol (15+ years) rate per 100,000 from 2016-2018 show that our numbers are relatively low compared to some regions of New Zealand:



Similarly, mortality wholly attributable to alcohol (15+ years) rate per 100,000 from 2007-2016 appears to be relatively low:



## 4.2 Police and Ambulance Data

A Police Intelligence Notification report of Marlborough alcohol-flagged incidences from 2019-2023 was provided on 13 November 2024. This report showed the temporal distribution of alcohol-flagged occurrences in the Blenheim and Picton area – showing hot spots particularly over Friday and Saturday nights through to the respective following morning:

### Blenheim LOI

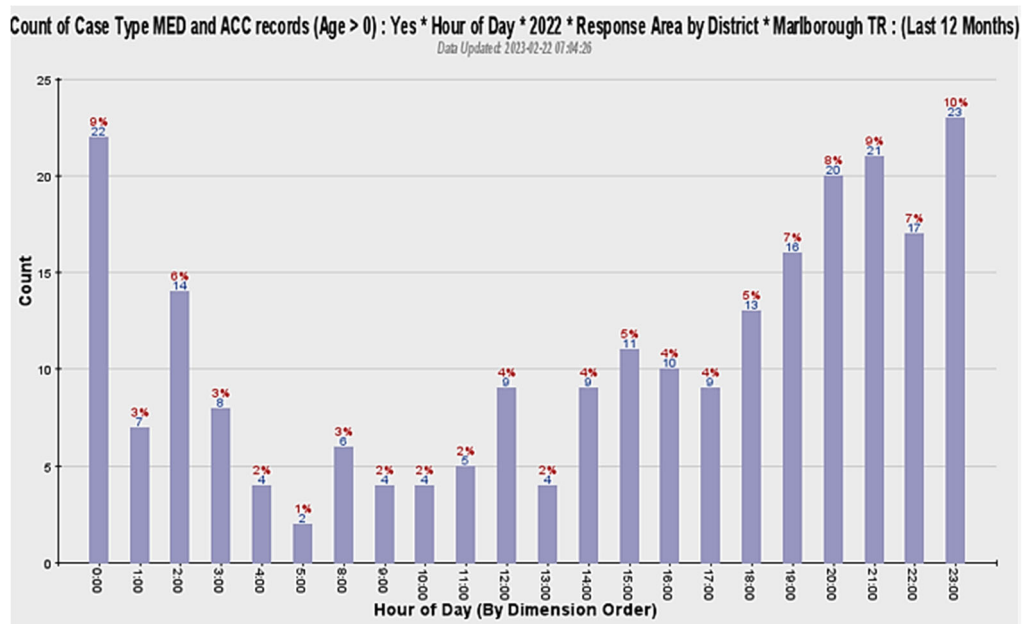
Hour	MON	TUE	WED	THU	FRI	SAT	SUN	TOTAL
0	2	3	6	2	7	38	58	116
1	2	0	2	1	5	42	58	110
2	0	0	0	2	3	21	62	88
3	4	0	1	2	2	20	53	82
4	0	0	0	0	1	6	8	15
5	0	0	1	2	0	0	0	3
6	0	0	1	0	0	1	1	3
7	0	0	0	1	2	2	1	6
8	0	1	2	0	1	0	3	7
9	2	1	3	3	5	0	1	15
10	1	0	1	4	2	3	2	13
11	2	2	9	3	4	3	1	24
12	3	2	2	3	1	3	8	22
13	0	2	1	1	5	2	4	15
14	1	3	5	6	4	6	4	29
15	7	2	1	5	4	3	5	27
16	1	0	4	1	7	4	3	20
17	0	2	4	2	2	3	2	15
18	1	4	5	4	3	6	7	30
19	5	4	4	8	4	4	6	35
20	3	6	5	3	7	15	4	43
21	2	3	3	9	14	5	5	41
22	1	5	8	7	18	20	7	66
23	2	3	3	8	20	42	2	80
TOTAL	39	43	71	77	121	249	305	905

### Picton LOI

Hour	MON	TUE	WED	THU	FRI	SAT	SUN	TOTAL
0	2	0	0	0	4	6	4	16
1	2	0	2	1	0	8	2	15
2	0	0	1	0	1	1	1	4
3	0	0	0	0	1	0	0	1
4	0	0	0	0	1	0	0	1
5	0	0	1	0	0	0	0	1
6	0	0	0	0	0	0	0	0
7	0	0	0	0	0	0	0	0
8	0	0	0	1	0	0	0	1
9	0	1	0	0	0	0	1	2
10	1	1	0	0	0	0	0	2
11	0	1	0	0	0	0	0	1
12	0	0	0	0	0	0	1	1
13	1	1	0	0	1	0	2	5
14	1	0	1	0	1	0	0	3
15	1	1	1	1	1	0	0	5
16	1	0	0	0	0	1	0	2
17	0	2	2	3	2	3	0	12
18	1	1	1	0	3	2	3	11
19	2	0	2	2	10	3	1	20
20	1	0	3	1	5	7	1	18
21	1	2	1	1	3	8	0	16
22	1	0	1	1	5	7	0	15
23	2	0	2	2	5	6	0	17
TOTAL	17	10	18	13	43	52	16	169

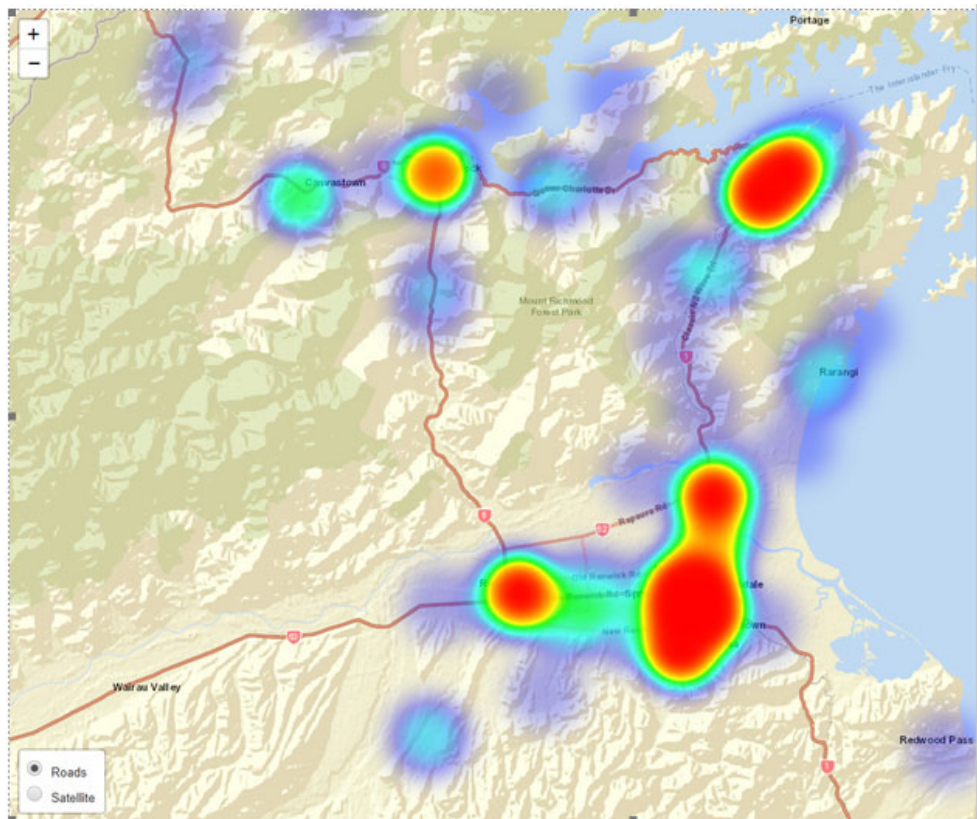


Similarly, St John Ambulance data shows that the number of alcohol related cases by time of day (during 2022-2023) was higher from later in the evening to early morning:



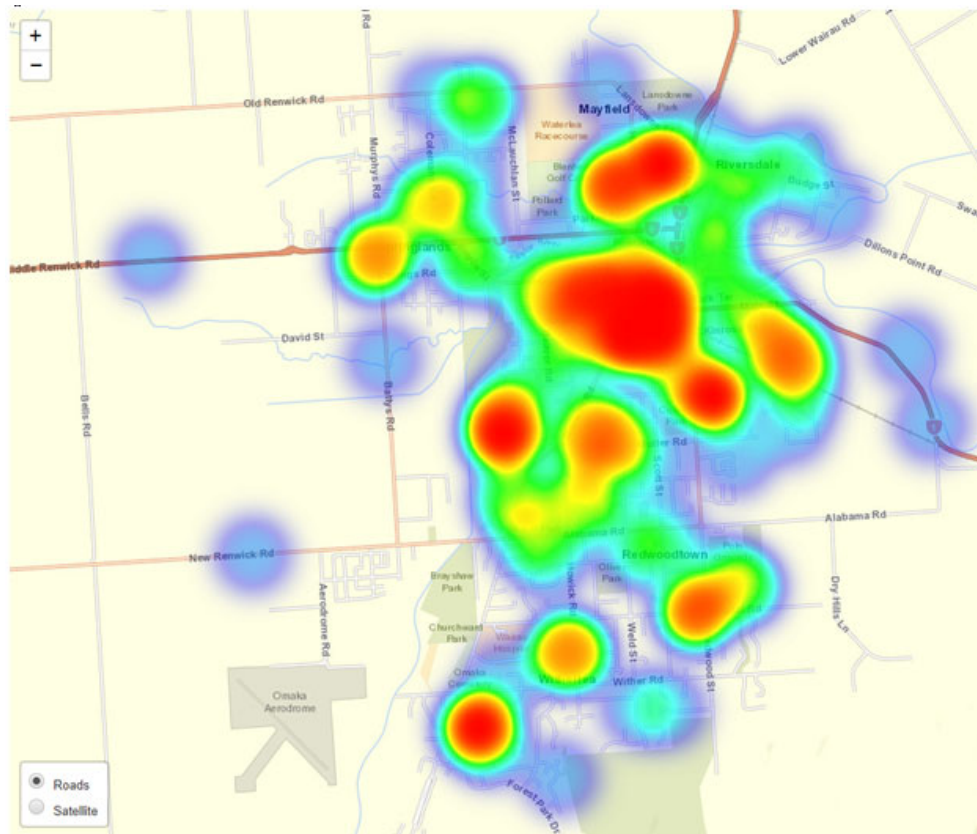
St John also provided heat maps for a 12-month period where alcohol related incidents had been occurring Marlborough wide and within Blenheim (as of 10 March 2023):

#### Marlborough:





## Blenheim:



## 5. Rationale for the Policies

### 5.1 Location of Licensed Premises by Reference to Broad Areas

It was determined that a Policy was not required for this purpose after having regard to the Marlborough Environment Plan which already determines where certain activities could be undertaken.

### 5.2 Location of Licensed Premises by Reference to Proximity to Premises of a Particular Kind or Kinds.

It was determined that a Policy was not required for this purpose as we were not seeing any clustering of licences of a particular kind.

### 5.3 Location of Licensed Premises by Reference to Proximity to Facilities of a Particular Kind or Kinds.

This was an area that was felt to be an important way to minimise alcohol exposure to vulnerable groups of people. Young people's exposure to alcohol outlets and susceptibility to associated alcohol advertising provides the grounds for the inclusion of a buffer between licensed premises and sensitive sites. Sensitive sites were therefore considered to include early childhood centres, kindergartens, school, kohanga reo, healthcare facilities, Marae, places of worship or other facilities considered to be where children or vulnerable populations would gather.

The Marlborough community has recently objected to two bottle stores that were proposed to be located near children's facilities, indicating this as an important concern for them. There is evidence that proximity of licensed premises may impact young people via contributing to the perception of alcohol consumption as normative behaviour (*Kuntsche E, Kuendig H, Gmel G. Alcohol outlet density, perceived availability and*

*adolescent alcohol use: a multilevel structural equation model [Internet]. Journal of Epidemiology & Community Health. 2008;62(9):811-6. Available from: <http://dx.doi.org/10.1136/jech.2007.065367>.*

International studies also advise that bottle stores in proximity to schools was significant in having students aged under 14 years of age more likely to partake in the consumption of alcohol. Trapp GS, Knuiman M, Hooper P, Foster S. *Proximity to liquor stores and adolescent alcohol intake: A prospective study [Internet]. American journal of preventive medicine. 2018;54(6):825-30. Available from: <https://www.sciencedirect.com/science/article/abs/pii/S074937971831599X>.*

There is also evidence that proximity of bottle stores to addiction treatment facilities was associated with a reduction in the likelihood of continuity of treatment (Stahler GJ, Mazzella S, Mennis J, Chakravorty S, Rengert G, Spiga R. *The effect of individual, program, and neighbourhood variables on continuity of treatment among dually diagnosed individuals [Internet]. Drug and Alcohol Dependence. 2007;87(1):54-62. Available from: <https://doi.org/10.1016/j.drugalcdep.2006.07.010>*)

## **5.4 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.**

It was determined that a cap on the number of certain types of Off Licences was appropriate in Marlborough. This resulted from community objection to recent proposed bottle stores along with the New Zealand and international research that bottle stores had a significant impact on low socio-economic and vulnerable communities. It was considered that On-licences and Club Licences provide a controlled drinking environment that is sufficiently regulated by the Act.

Exclusions on the prohibition of a new Off Licence does not include the following types of premises:

- cellar doors,
- hotels,
- supermarket/grocery stores,
- remote sales - only Off Licences; and
- premises where the alcohol being sold is manufactured on site or made from ingredients grown on site.

These exclusions were considered appropriate as they were either premises that did not focus completely on the sale of alcohol, where there would be no exposure of the alcohol to customers or where sale of the product was a result of the manufacture of alcohol on site.

## **5.5 Maximum Trading Hours**

Consideration was given to reducing hours for all licences to reduce the amount of time alcohol was available for purchase. International and national studies have shown that hazardous drinking increases with longer hours and greater availability. New Zealand research has shown that the purchase of alcohol from an off-licence premises after 10.00pm was approximately twice as likely to be made by heavier drinkers (Supra at 246 = Casswell S, Huckle T, Wall M, Yeh LC. *International alcohol control study: pricing data and hours of purchase predict heavier drinking. Alcoholism: Clinical and Experimental Research [Internet]. 2014. 38(5):1425-31.*

Different types of premises were looked into and premises where food sales were the primary purpose were given an earlier maximum trading hour to reflect that generally patrons are not ordering a meal past midnight. This approach is a risk based one, as premises such as Night Clubs and Taverns, where alcohol is the primary purpose of the premises, pay more for the licensing fees to reflect the increased monitoring of their compliance.

Police alcohol related heat maps and Ambulance data showed that early hours of Saturday and Sunday mornings is when most harm was seen.

## 5.6 Discretionary Conditions

These conditions were considered to be appropriate in certain circumstances to assist in minimising alcohol related harm.

## 5.7 One-way Door Restrictions

Police believe that these are beneficial to avoid intoxicated patrons migrating between venues and that they encourage anyone leaving a premises to head home. Recent experience with the application of a one-way-door at a premises in Blenheim has supported this approach.

It was deemed appropriate that this should be applied for one hour prior to those premises that close after 1.00am (except hotels where patrons can stay on site).

## 5.8 Special Licences

These policies were drafted to provide clarity on the number of times a premises can have a special licence during a 12-month period and ensures that a series of events happening for a long period does not occur under this style of licence.

This aligns with Case Law (New Zealand Police – Burger Wisconsin [1994] NZLLA 454) which advises '*that a special licence should not be issued as a substitute for a "permanent" licence.*'