Notice is hereby given that an Ordinary meeting of Southland District Council will be held on:

Date:	**Wednesday, 27 August 2025**
Time:	**10am**
Meeting room:	**Council Chamber**
Venue:	**Level 2** **20 Don Street** **Invercargill**

Council Agenda
OPEN

MEMBERSHIP

Mayor	Rob Scott
Deputy mayor	Christine Menzies
Councillors	Jaspreet Boparai
	Don Byars
	Derek Chamberlain
	Paul Duffy
	Darren Frazer
	Sarah Greaney
	Julie Keast
	Tom O'Brien
	Margie Ruddenklau
	Jon Spraggon
	Matt Wilson

IN ATTENDANCE

Acting Chief Executive	Vibhuti Chopra
Committee advisor	Fiona Dunlop

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Full agendas are available on Council's website
www.southlanddc.govt.nz

Note: The reports contained within this agenda are for consideration and should not be construed as Council policy unless and until adopted. Should Members require further information relating to any reports, please contact the relevant manager, Chairperson or Deputy Chairperson.

Health and safety

Toilets – The toilets are located outside of the chamber, directly down the hall on the right.

Earthquake – Drop, cover and hold applies in this situation and, if necessary, once the shaking has stopped we will evacuate down the stairwell without using the lift, meeting again in the carpark on Spey Street.

Evacuation – Should there be an evacuation for any reason please exit down the stairwell to the assembly point, which is the entrance to the carpark on Spey Street. Please do not use the lift.

Phones – Please turn your mobile devices to silent mode.

Recording - These proceedings are being recorded for the purpose of live video, both live streaming and downloading. By remaining in this meeting, you are consenting to being filmed for viewing by the public.

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Mā te whakarongo	Through listening
Mā te kōrero	Through talking
Mā te ngakau	From the heart
Mā te wairua	From the spirit
Mā te manaaki mai	Through giving
Mā te manaaki atu	And receiving respect
Ka puawai te maramatanga	Understanding will bloom
Tihei mauri ora	This is the essence of life

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PUBLIC EXCLUDED

Procedural motion to exclude the public **660**

C8.1 Ulva Island wharf replacement Error! Bookmark not defined.

C8.2 Manapouri wastewater treatment plant and pipeline business case and unbudgeted expenditure request Error! Bookmark not defined.

Karakia Whakamutunga

Kia hora te marino	May peace be widespread
Kia whakapapa pounamu te moana	May the sea be like greenstone
Hei huarahi mā tātou i te rangi nei	A pathway for us all this day
Aroha atu, aroha mai	Let us show respect for each other
Tātou i a tātou katoa	For one another
Hui e! Tāiki e!	Bind us all together!

1 Apologies

At the close of the agenda no apologies had been received.

2 Leave of absence

At the close of the agenda no requests for leave of absence had been received.

3 Conflict of Interest

Councillors are reminded of the need to be vigilant to stand aside from decision-making when a conflict arises between their role as a councillor and any private or other external interest they might have.

4 Extraordinary/Urgent Items

To consider, and if thought fit, to pass a resolution to permit the Council to consider any further items which do not appear on the Agenda of this meeting and/or the meeting to be held with the public excluded.

Such resolution is required to be made pursuant to Section 46A(7) of the Local Government Official Information and Meetings Act 1987, and the Chairperson must advise:

(i) The reason why the item was not on the Agenda, and

(ii) The reason why the discussion of this item cannot be delayed until a subsequent meeting.

Section 46A(7A) of the Local Government Official Information and Meetings Act 1987 (as amended) states:

"Where an item is not on the agenda for a meeting,-

(a) that item may be discussed at that meeting if-

  (i) that item is a minor matter relating to the general business of the local authority; and

  (ii) the presiding member explains at the beginning of the meeting, at a time when it is open to the public, that the item will be discussed at the meeting; but

(b) no resolution, decision or recommendation may be made in respect of that item except to refer that item to a subsequent meeting of the local authority for further discussion."

5 Confirmation of Council Minutes

5.1 Meeting minutes of Council, 13 August 2025

6 Public Participation

Notification to speak is required by 12noon at least one clear day before the meeting. Further information is available on www.southlanddc.govt.nz or phoning 0800 732 732

Council

OPEN MINUTES

Minutes of a meeting of Council held in the Council Chamber, Level 2, 20 Don Street, Invercargill on Wednesday, 13 August 2025 at 10am. (10am – 12.32pm, 2.18pm – 3.11pm (PE 12.05pm – 12.32pm, 2.19pm – 3.11pm)

PRESENT

Mayor	Rob Scott
Deputy mayor	Christine Menzies
Councillors	Jaspreet Boparai
	Don Byars
	Derek Chamberlain
	Paul Duffy
	Darren Frazer
	Julie Keast
	Tom O'Brien
	Margie Ruddenklau
	Jon Spraggon
	Matt Wilson

APOLOGIES

Councillor Sarah Greaney

IN ATTENDANCE

Committee advisor	Fiona Dunlop
Chief executive	Cameron McIntosh

Mayor Scott opened the meeting with a karakia timatanga as follows:

Mā te whakarongo	Through listening
Mā te kōrero	Through talking
Mā te ngakau	From the heart
Mā te wairua	From the spirit
Mā te manaaki mai	Through giving
Mā te manaaki atu	And receiving respect
Ka puawai te maramatanga	Understanding will bloom
Tihei mauri ora	This is the essence of life

1 Apologies

There were apologies for absence from Councillor Greaney.

Resolution

Moved Cr Boparai, seconded Cr Keast and **resolved:**

That Council accept the apology.

2 Leave of absence

There were no requests for leave of absence.

3 Conflict of Interest

There were no conflicts of interest declared.

4 Extraordinary/Urgent Items

Mayor Scott advised that there was a late item for the agenda which is Adoption fo Southland District Council Water Service Delivery Plan.

The reason why the item was not with the agenda when it was compiled was that the financial information was still being finalised.

The reason why the item cannot wait until a subsequent meeting, is that Council needs to approve the water services delivery plan and it be submitted to the Secretary of Local Government by 3 September 2025.

Moved Mayor Scott, seconded Cr Frazer and **resolved:**

That Council pursuant to section 46A of the Local Government Information and Meetings Act 1987, considers the late item Adoption of Southland District Council Water Service Delivery Plan

5 Confirmation of Council Minutes

Resolution

Moved Cr Spraggon, seconded Cr Boparai **and resolved:**

That the Council confirms the minutes of the meeting held on 30 July 2025 as a true and correct record of that meeting.

6 PUBLIC PARTICIPATION

MR BRIAN CROOT REPRESENTING THE WINTON CENTRAL BOWLING CLUB (IN RECESS) ADDRESSED THE MEETING REGARDING SEWAGE AND WATER CHARGES, WATER SERVICES TO THE BOWLING CLUB, SPRINGFORD STREET CLUB CARPARK AND THE MOWING OF THE BOWLING GREEN.

REPORTS

7.1 INVESTMENT AND LIABILITY MANAGEMENT POLICY - ADOPTION

RECORD NO: R/25/7/31697

FINANCIAL ACCOUNTANT – JO HOOPER, FINANCE DEVELOPMENT COORDINATOR – NICOLE TAYLOR AND GM FINANCE AND ASSURANCE – ANNE ROBSON WERE IN ATTENDANCE FOR THIS ITEM.

THE PURPOSE OF THE REPORT WAS TO PRESENT THE INVESTMENT AND LIABILITY MANAGEMENT POLICY TO COUNCIL FOR ADOPTION FOLLOWING CONSIDERATION BY THE FINANCE AND ASSURANCE COMMITTEE AT THEIR MEETING IN JUNE 2025.

THE INVESTMENT AND LIABILITY MANAGEMENT POLICY (THE POLICY) OUTLINES HOW COUNCIL WILL MANAGE ITS INVESTMENTS, INCLUDING WHAT COUNCIL WILL INVEST IN, AND HOW INVESTMENT RISK WILL BE ASSESSED AND MANAGED. THE POLICY ALSO OUTLINES HOW COUNCIL WILL MANAGE BORROWINGS TO MINIMISE ASSOCIATED RISK.

THE KEY CHANGES TO THE POLICY INCLUDED:

- CLARIFYING THE POLICY REQUIREMENTS, INCLUDING BETTER GUIDANCE AROUND INVESTMENT OF RESERVES, AND THE BORROWING CONTROLS AND LIMITS, TO MINIMISE NON-COMPLIANCE AREAS
- UPDATING DEFINITIONS TO BE CONSISTENT WITH REGULATIONS
- UPDATING THE REPORTING REQUIREMENTS, ROLES AND RESPONSIBILITIES.

RESOLUTION

MOVED CR KEAST, SECONDED CR DUFFY **RECOMMENDATIONS A TO D AND A NEW E (AS INDICATED) AND RESOLVED:**

THAT THE COUNCIL:

A) RECEIVES THE REPORT TITLED "INVESTMENT AND LIABILITY MANAGEMENT POLICY - ADOPTION".

B) DETERMINES THAT THIS MATTER OR DECISION BE RECOGNISED AS NOT SIGNIFICANT IN TERMS OF SECTION 76 OF THE LOCAL GOVERNMENT ACT 2002.

C) DETERMINES THAT IT HAS COMPLIED WITH THE DECISION-MAKING PROVISIONS OF THE LOCAL GOVERNMENT ACT 2002 TO THE EXTENT NECESSARY IN RELATION TO THIS DECISION; AND IN ACCORDANCE WITH SECTION 79 OF THE ACT DETERMINES THAT IT DOES NOT REQUIRE FURTHER INFORMATION, FURTHER ASSESSMENT OF OPTIONS OR FURTHER ANALYSIS OF COSTS AND BENEFITS OR ADVANTAGES AND DISADVANTAGES PRIOR TO MAKING A DECISION ON THIS MATTER.

D) AGREES TO ADOPT THE INVESTMENT AND LIABILITY MANAGEMENT POLICY (ATTACHED AS APPENDIX A TO THE MINUTES).

NEW E REQUEST THAT STAFF REVIEW THE INVESTMENT AND LIABILITY MANAGEMENT STRATEGY AS PART OF THE NEXT LONG TERM PLAN.

COUNCILLORS BYARS, CHAMBERLAIN, RUDDENKLAU AND WILSON REQUESTED THAT THEIR DISSENTING VOTES BE RECORDED.

7.2 PROPOSED UPDATE TO DELEGATIONS MANUAL

RECORD NO: R/25/7/32335

DEMOCRACY ADVISOR – MICHAL GRAY AND FINANCE DEVELOPMENT COORDINATOR - NICOLE TAYLOR WERE IN ATTENDANCE FOR THIS ITEM.

THE PURPOSE OF THE REPORT WAS TO PROVIDE TO COUNCIL UPDATES TO THE DELEGATIONS MANUAL.

COUNCIL NOTED THAT THE MANUAL WAS BEING UPDATED WITH THE FOLLOWING CHANGES:

- ALTERATIONS AND FURTHER DELEGATIONS MADE BY THE CHIEF EXECUTIVE SINCE THE MANUAL WAS ADOPTED ON 19 JUNE 2024
- CHANGES TO THE FORMATTING OF THE DELEGATIONS TO COMMUNITY BOARDS AND ADDITION OF DEFINITION FOR APPROVED BUDGET
- REMOVAL OF DELEGATIONS TO THE FIVE RIVERS WATER SUPPLY SUBCOMMITTEE
- REMOVAL OF THE INVESTMENT AND LIABILITY MANAGEMENT POLICY FROM ATTACHMENT A OF THE MANUAL, WITH RELEVANT STAFF DELEGATIONS NOW INCORPORATED INTO THE FINANCIAL DELEGATIONS SECTION AND AN ADJUSTMENT TO THE TREASURY DELEGATIONS FOR THE FINANCE AND ASSURANCE COMMITTEE
- CHANGES TO COUNCIL'S FINANCIAL AND STATUTORY DELEGATIONS TO ENSURE THAT THEY ARE PRACTICAL/EFFICIENT, ALIGN TO CURRENT STAFFING STRUCTURE AND CURRENT PRACTICES
- REMOVAL OF DELEGATIONS UNDER THE HEALTH (HAIRDRESSERS) REGULATIONS 1980
- CHANGES TO THE NON-STATUTORY DELEGATIONS FROM THE CHIEF EXECUTIVE TO STAFF.

RESOLUTION

MOVED CR FRAZER, SECONDED CR KEAST **AND RESOLVED:**

THAT COUNCIL:

A) RECEIVES THE REPORT TITLED "PROPOSED UPDATE TO DELEGATIONS MANUAL ".

B) DETERMINES THAT THIS MATTER OR DECISION BE RECOGNISED AS NOT SIGNIFICANT IN TERMS OF SECTION 76 OF THE LOCAL GOVERNMENT ACT 2002.

C) DETERMINES THAT IT HAS COMPLIED WITH THE DECISION-MAKING PROVISIONS OF THE LOCAL GOVERNMENT ACT 2002 TO THE EXTENT NECESSARY IN RELATION TO THIS DECISION; AND IN ACCORDANCE WITH SECTION 79 OF THE ACT DETERMINES THAT IT DOES NOT REQUIRE FURTHER INFORMATION, FURTHER ASSESSMENT OF OPTIONS OR FURTHER ANALYSIS OF COSTS AND BENEFITS OR ADVANTAGES AND DISADVANTAGES PRIOR TO MAKING A DECISION ON THIS MATTER.

D) APPROVES AND ADOPTS THE DELEGATIONS MANUAL CONTAINED IN ATTACHMENT A WHICH INCLUDES THE FOLLOWING AMENDMENTS:

- **ALTERATIONS AND FURTHER DELEGATIONS MADE BY THE CHIEF EXECUTIVE SINCE THE MANUAL WAS ADOPTED ON 19 JUNE 2024**
- **CHANGES TO THE FORMATTING OF THE DELEGATIONS TO THE COMMUNITY BOARDS AND ADDITION OF DEFINITION FOR APPROVED BUDGET**
- **REMOVAL OF DELEGATIONS TO THE FIVE RIVERS WATER SUPPLY SUBCOMMITTEE**
- **REMOVAL OF THE INVESTMENT AND LIABILITY MANAGEMENT POLICY FROM THE MANUAL WITH CORRESPONDING CHANGES MADE TO REFLECT PROPOSED REVISIONS TO THE INVESTMENT AND LIABILITY MANAGEMENT POLICY RELATING TO:**
  - **POWERS AND RESPONSIBILITIES RETAINED BY COUNCIL**
  - **FINANCIAL DELEGATIONS FOR INVESTING AND BORROWING AND APPROVING ELECTRONIC BANKING AMENDMENTS**
  - **TREASURY DELEGATIONS FOR THE FINANCE AND ASSURANCE COMMITTEE**
- **CHANGES TO COUNCIL'S FINANCIAL AND STATUTORY DELEGATIONS TO ENSURE THAT THEY ARE PRACTICAL/EFFICIENT, ALIGN TO CURRENT STAFFING STRUCTURE AND CURRENT PRACTICES**
- **REMOVAL OF DELEGATIONS UNDER THE HEALTH (HAIRDRESSERS) REGULATIONS 1980**

- **CHANGES TO THE NON-STATUTORY DELEGATIONS FROM THE CHIEF EXECUTIVE TO STAFF WITH THE FOLLOWING ADDITION TO THE DELEGATIONS FOR THE FINANCE AND ASSURANCE COMMITTEE:**

  TREASURY

  A) OVERSEE THE TREASURY FUNCTION OF COUNCIL ENSURING COMPLIANCE WITH THE RELEVANT COUNCIL POLICIES AND PLANS
  B) ENSURING COMPLIANCE WITH THE REQUIREMENTS OF COUNCIL'S TRUST DEEDS ARE MET
  C) ~~RECOMMEND TO~~ REVIEW COUNCIL TREASURY POLICIES (INVESTMENT AND LIABILITY MANAGEMENT POLICY) AT LEAST ONCE EVERY THREE YEARS TO ENSURE LEGISLATIVE COMPLIANCE, EFFECTIVE FINANCIAL RISK MANAGEMENT, AND ALIGNMENT WITH COUNCIL'S STRATEGIC/FINANCIAL GOALS, AND RECOMMEND**ING THE POLICY TO COUNCIL INCORPORATING ANY CHANGES** ~~TO THE POLICY TO COUNCIL~~.
  D) APPROVE ~~DEBT, INTEREST RATE AND EXTERNAL INVESTMENT MANAGEMENT~~ INVESTMENT, BORROWING AND RISK MANAGEMENT STRATEGY

E) NOTES THAT THE DELEGATION CHANGES TAKE EFFECT ON THE DATE OF THIS RESOLUTION, AND THAT STAFF WILL UPDATE COUNCIL'S DELEGATIONS MANUAL ACCORDINGLY

F) RESOLVES TO DISCHARGE THE FIVE RIVERS WATER SUPPLY SUBCOMMITTEE.

7.3 UPDATE ON COUNCIL LAND AT WAIKAIA – 37 SWALWELL STREET

RECORD NO: R/25/5/23921

MANAGER PROPERTY SERVICES – KEVIN MCNAUGHT AND GM CUSTOMER AND COMMUNITY WELLBEING – SAM MARSHALL WERE IN ATTENDANCE FOR THIS THIS.

THE PURPOSE OF THE REPORT WAS FOR COUNCIL TO CONSIDER THE LAND AT 37 SWALWELL STREET, WAIKAIA, BEING SECTIONS 1-22, BLOCK II, TOWN OF WAIKAIA, IS NOT SURPLUS TO REQUIREMENTS AND IS TO BE RETAINED.

THE ARDLUSSA COMMUNITY BOARD AT ITS MEETING ON 16 DECEMBER 2024, RESOLVED TO RECOMMEND TO COUNCIL THAT THE LAND IS TO BE RETAINED.

COUNCIL NOTED THAT STAFF ARE TO INVESTIGATE ENTERING INTO INTERIM LEASES/LICENCES WITH INTERESTED PARTIES FOR (A) THE WAIKAIA DEPOT AND (B) THE BALANCE PARCELS (PADDOCKS) FOR GRAZING WHILE THE SPATIAL PLANNING PROCESS IS COMPLETED.

RESOLUTION

MOVED CR WILSON, SECONDED CR BOPARAI **AND RESOLVED:**

THAT COUNCIL:

A) RECEIVES THE REPORT TITLED "UPDATE ON COUNCIL LAND AT WAIKAIA".

B) DETERMINES THAT THIS MATTER OR DECISION BE RECOGNISED AS NOT SIGNIFICANT IN TERMS OF SECTION 76 OF THE LOCAL GOVERNMENT ACT 2002.

C) DETERMINES THAT IT HAS COMPLIED WITH THE DECISION-MAKING PROVISIONS OF THE LOCAL GOVERNMENT ACT 2002 TO THE EXTENT NECESSARY IN RELATION TO THIS DECISION; AND IN ACCORDANCE WITH SECTION 79 OF THE ACT DETERMINES THAT IT DOES NOT REQUIRE FURTHER INFORMATION, FURTHER ASSESSMENT OF OPTIONS OR FURTHER ANALYSIS OF COSTS AND BENEFITS OR ADVANTAGES AND DISADVANTAGES PRIOR TO MAKING A DECISION ON THIS MATTER.

D) ACKNOWLEDGES THE POSITION OF THE ARDLUSSA COMMUNITY BOARD AND DETERMINES THAT THE LAND AT 37 SWALWELL STREET, WAIKAIA BEING SECTIONS 1-22, BLOCK II, TOWN OF WAIKAIA, IS NOT SURPLUS TO REQUIREMENTS AND IS TO BE RETAINED.

E) RECOMMENDS THAT STAFF INVESTIGATE ENTERING INTO INTERIM LEASES/LICENCES WITH INTERESTED PARTIES FOR (A) THE WAIKAIA DEPOT AND (B) THE BALANCE PARCELS (PADDOCKS) FOR GRAZING WHILE THE SPATIAL PLANNING PROCESS IS COMPLETED.

7.4 ADOPTION OF SOUTHLAND DISTRICT COUNCIL WATER SERVICE DELIVERY PLAN

RECORD NO: R/25/7/32356

CONTRACTOR - THREE WATERS TRANSITION LEAD – JENDI PATERSON, MANAGER OPERATIONS AND PROGRAMMING - GEOFF GRAY AND CHIEF EXECUTIVE – CAMERON MCINTOSH WERE IN ATTENDANCE FOR THIS THIS.

THE PURPOSE OF THE REPORT WAS FOR COUNCIL TO APPROVE OF THE FINAL WATER SERVICES DELIVERY PLAN, AS REQUIRED UNDER THE LOCAL GOVERNMENT (WATER SERVICES PRELIMINARY ARRANGEMENTS) ACT 2024.

THE REPORT PRESENTED CONFIRMS THAT THE PLAN IS COMPLIANT WITH THE LOCAL GOVERNMENT (WATER SERVICES PRELIMINARY ARRANGEMENTS) ACT 2024. IT REFLECTS FEEDBACK RECEIVED FROM THE DEPARTMENT OF INTERNAL AFFAIRS AND INCORPORATES AMENDMENTS TO ENSURE A COMPLIANT AND FINANCIALLY SUSTAINABLE PATHWAY.

FOLLOWING FURTHER EXECUTIVE DELIBERATION AND IN RESPONSE TO THE DEPARTMENT OF INTERNAL AFFAIRS FEEDBACK, THE PLAN INCLUDES FULLY FUNDING DEPRECIATION FOR DRINKING WATER, WASTEWATER AND STORMWATER SERVICES FROM 2027/2028. THIS CHANGE ENSURES THE PLAN MEETS THE SECTION 8 SUSTAINABILITY CRITERIA WHILE MAINTAINING COUNCIL'S RURAL SERVICE DELIVERY CHALLENGES.

THE REPORT OUTLINED:

- THE LEGISLATIVE FRAMEWORK AND JOURNEY TO DATE
- COUNCIL'S ASSESSMENT OF SERVICE DELIVERY MODELS AND COMMUNITY CONSULTATION

- KEY UPDATES MADE TO STRENGTHEN THE PLAN IN RESPONSE TO DEPARTMENT OF INTERNAL AFFAIRS FEEDBACK
- THE UNIQUE RURAL CONTEXT AND EVOLVING REGULATORY ENVIRONMENT COUNCIL CONTINUES TO ADVOCATE WITHIN
- THE IMPLICATIONS OF FULLY FUNDING DEPRECIATION ON RATES.

COUNCIL NOTED THAT THE DECISION IS THE CULMINATION OF SOUTHLAND DISTRICT COUNCIL'S WATER REFORM RESPONSE WHICH MUST BE SUBMITTED TO THE SECRETARY FOR LOCAL GOVERNMENT BY 3 SEPTEMBER 2025.

(DURING DISCUSSION, COUNCILLOR BYARS LEFT THE MEETING AT 11.44AM AND RETURNED AT 11.47AM.)

RESOLUTION

MOVED CR BOPARAI, SECONDED CR RUDDENKLAU **RECOMMENDATIONS A TO I AND A NEW J (AS INDICATED) AND RESOLVED:**

THAT COUNCIL:

A) RECEIVES THE REPORT TITLED "ADOPTION OF SOUTHLAND DISTRICT COUNCIL WATER SERVICE DELIVERY PLAN".

B) DETERMINES THAT THIS MATTER OR DECISION BE RECOGNISED AS SIGNIFICANT IN TERMS OF SECTION 76 OF THE LOCAL GOVERNMENT ACT 2002 AND NOTES THAT THE ENGAGEMENT FOLLOWED WAS AS REQUIRED UNDER THE LOCAL GOVERNMENT (WATER SERVICES PRELIMINARY ARRANGEMENTS) ACT 2024.

C) DETERMINES THAT IT HAS COMPLIED WITH THE DECISION-MAKING PROVISIONS OF THE LOCAL GOVERNMENT ACT 2002 TO THE EXTENT NECESSARY IN RELATION TO THIS DECISION; AND IN ACCORDANCE WITH SECTION 79 OF THE ACT DETERMINES THAT IT DOES NOT REQUIRE FURTHER INFORMATION, FURTHER ASSESSMENT OF OPTIONS OR FURTHER ANALYSIS OF COSTS AND BENEFITS OR ADVANTAGES AND DISADVANTAGES PRIOR TO MAKING A DECISION ON THIS MATTER.

D) NOTES THAT COUNCIL'S PREFERRED DELIVERY MODEL IS THE ADJUSTED STATUS QUO (IN-HOUSE) APPROACH, AS PREVIOUSLY ENDORSED.

E) NOTES THAT THE WATER SERVICES DELIVERY PLAN IS BASED ON THE 2024-2034 LONG TERM PLAN WITH AMENDMENTS AS FOLLOWS:

- **FULLY FUND THE WATER, WASTEWATER AND STORMWATER DEPRECIATION FROM 2027/2028 TO MEET THE FINANCIAL SUSTAINABILITY REQUIREMENT UNDER THE LOCAL GOVERNMENT (WATER SERVICES PRELIMINARY ARRANGEMENTS) ACT 2024. RECOGNISING THAT WATER AND WASTEWATER DEPRECIATION HAS BEEN FUNDED IN COUNCILS 2024-2034 LONG TERM PLAN OVER 8 YEARS WITH A 5% ANNUAL INCREASE AND THAT STORMWATER DEPRECIATION WAS NOT FUNDED AT ALL.**

- **UNDERTAKE TO FULLY FUND WATER AND WASTEWATER INTEREST ON LOANS FROM RATE FUNDING IN 2026/2027 AS INDICATED IN THE LONG TERM PLAN**
- **THE LEVELS OF SERVICE CAPITAL PROJECTS TOTAL COST HAVE BEEN REVIEWED TO ACKNOWLEDGE AND SEPARATE OUT THE PORTION RELATING TO CAPITAL RENEWALS**

F) ADOPTS THE WATER SERVICES DELIVERY PLAN AND AGREES FOR IT TO BE SUBMITTED TO THE DEPARTMENT OF INTERNAL AFFAIRS BY 3 SEPTEMBER 2025.

G) AUTHORISES THE CHIEF EXECUTIVE TO FINALISE AND CERTIFY THE WATER SERVICES DELIVERY PLAN FOR SUBMISSION.

H) ACKNOWLEDGES THE RISK OF INTERVENTION SHOULD THE PLAN NOT BE ACCEPTED AND NOTES STEPS TAKEN TO MITIGATE THIS.

I) NOTES THE ONGOING UNCERTAINTY REGARDING FINAL WASTEWATER STANDARDS AND COUNCIL'S INTENTION TO RESPOND THROUGH FUTURE PLANNING CYCLES.

NEW J ACKNOWLEDGE THE STAFF AND THE THOUSANDS OF HOURS INVOLVED BY THE TEAM TO GET THE SOUTHLAND DISTRICT COUNCIL WATER SERVICES DELIVERY PLAN ACROSS THE LINE.

(COUNCILLOR RUDDENKLAU LEFT THE MEETING AT 12.01PM.)
(COUNCILLOR O'BRIEN LEFT THE MEETING AT 12.01PM.)

PUBLIC EXCLUDED

Exclusion of the public: Local Government Official Information and Meetings Act 1987

Resolution

Moved Mayor Scott, seconded Cr Keast **and resolved:**

That the public be excluded from the following part(s) of the proceedings of this meeting.

C8.1 Update on Council land in Riverton

C8.2 Potential disposal of Council owned property - Te Anau

C8.3 Options for delivery of regional heritage services

C8.4 Forest Management and Harvest Plan 2025/2026

The general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Ground(s) under section 48(1) for the passing of this resolution
Update on Council land in Riverton	s7(2)(a) - the withholding of the information is necessary to protect the privacy of natural persons, including that of a deceased person.	That the public conduct of the whole or the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists.
Potential disposal of Council owned property - Te Anau	s7(2)(h) - the withholding of the information is necessary to enable the local authority to carry out, without prejudice or disadvantage, commercial activities.	That the public conduct of the whole or the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists.
Options for delivery of regional heritage services	s7(2)(c)(ii) - the withholding of the information is necessary to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely to damage the public interest. s7(2)(g) - maintain legal professional privilege.	That the public conduct of the whole or the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists.
Forest Management and Harvest Plan 2025/2026	s7(2)(h) - the withholding of the information is necessary to enable the local authority to carry out, without prejudice or disadvantage, commercial activities.	That the public conduct of the whole or the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists.

Councillor Wilson requested that his dissenting vote be recorded for item C8.3 - Options for delivery of regional heritage services being taken in public excluded.

The public were excluded at 12.02pm.

The meeting adjourned at 12.02pm and reconvened at 12.05pm.

Councillor O'Brien returned to the meeting at 12.05pm.

Councillor Ruddenklau return to the meeting at 12.08pm.

Councillor Byars left the meeting at 12.28pm and returned at 12.30pm.

The meeting returned to open meeting at 12.32pm and adjourned for lunch.

The meeting reconvened at 2.18pm.

The meeting returned to public excluded at 2.19pm.

Resolutions in relation to the confidential items are recorded in the confidential section of these minutes and are not publicly available unless released here.

The meeting concluded at 3.11pm.

CONFIRMED AS A TRUE AND CORRECT RECORD OF A MEETING OF THE COUNCIL HELD ON WEDNESDAY 13 AUGUST 2025.

DATE:.....

CHAIRPERSON:.....

Appendix A

Investment and Liability Management Policy

Group Responsible:	**Group Manager of Finance and Assurance**
Date Approved:	**13 August 2025**
Effective from:	**13 August 2025**
File No:	**R/25/8/38200**

1.0 Overview

The Local Government Act 2002 requires local authorities to adopt an Investment Policy and a Liability Management Policy.

The Investment Policy is designed to ensure that the financial resources of the Council are managed in an efficient and effective way. It sets out how Council can utilise funds from the sale of assets, what should be done with the investment income and so on.

The Liability Management Policy is designed to provide a framework for prudent debt management and sets out how Council may wish to use debt as a funding mechanism.

Council has a structure of responsibilities and reporting lines to ensure the appropriate management and accountability of the liability and investing activities.

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2.0 Structure

Organisational Structure

The organisational chart for the finance activity is as follows:

Responsibilities

The key responsibilities of the above positions are as follows:

Council

Council approves this Policy and any changes to this Policy.

In addition, Council has responsibility for:

- approving the long-term financial position through the Long Term Plan (LTP) and associated financial strategy along with the adopted Annual Plan
- approving delegations to the Chief Executive
- approving delegations to the Finance and Assurance Committee in relation to this Policy as part of the Committee's terms of reference (such as overseeing the treasury function, receiving reports on treasury activities and risks, approving associated strategies and reviewing/recommending the policy to Council)
- approving all external Council borrowing outside of the approved budget. The approved budget for the financial year comprises the base budget approved by Council through the LTP or Annual Plan, along with any adjustments formally approved during the year for unbudgeted expenditure, forecasting changes and carry forwards by those with delegated authority
- approve membership to Local Government Funding Agency (LGFA) including CCO/CCTOs.

Chief Executive (CE)

The CE is responsible for ensuring the adopted Policy is effectively implemented and administered in accordance with its terms, and that all reporting requirements are fulfilled. To enable this, Council delegates authority to the CE as stated in its published Delegations Manual. Unless explicitly prohibited by

the Policy or legislation, the CE may sub-delegate duties and responsibilities to other officers, in accordance with Council's published Delegations Manual.

In addition to the specified delegated authorities, Council expects the CE to:

- ensure compliance with this Policy
- review this Policy at least once every three years to ensure legislative compliance, effective financial risk management, and alignment with Council's strategic and financial goals. The CE must report the outcomes of the review to the Finance and Assurance Committee, including any recommended changes to the Policy
- report quarterly the Finance and Assurance committee on debt and liquidity levels, interest rate risk, and other issues including any non-compliance with this Policy
- recommend to the Finance and Assurance committee relevant investment, borrowing and risk management strategies
- receive advice of any non-compliance with this Policy, and any significant events
- sign compliance certificates under borrowing and hedging agreements (including under section 118 of the Local Government Act 2002), and instructions to the Trustee under Council's Debenture Trust Deed, as required.

3.0 Investment

Introduction

This Investment Policy has been prepared pursuant to Section 102(1) of the Local Government Act 2002 (the "Act"), which requires the Council to adopt an Investment Policy and a Liability Management Policy. Section 105 of the Act sets out what must be included in an Investment Policy.

Council generally holds investments for strategic reasons where there is some community, social, physical or economic benefit accruing from the investment activity.

Council's rationale for retaining investments is:

- strategic assets are to be held by the Council, for public good
- to earn from strategic investments a cash flow for investment in community wellbeing
- to prudently manage cash flows within annual budget parameters.

Council is a risk conscious entity and does not wish to incur additional risk from its treasury activities. Accordingly, Council's primary objective when investing is the protection of its initial investment and generating a commercial return on strategic investments is considered a secondary objective.

Objectives

The key investment policy objectives are to:

- provide a framework for the prudent and effective management of investments
- ensure that investments are managed in accordance with current governing legislation and Council's strategic and commercial objectives
- manage investments in a sustainable and equitable way, having regard to current and future generations
- recognise the community ownership of these assets and the need for a balanced investment/risk profile
- ensure Council assets are managed prudently and adequately safeguarded

- safeguard Council's financial market investments by establishing and regularly reviewing investment parameters and ensuring all investment activities are carried out within these parameters
- maximise interest income on treasury investments, within a prudent level of investment risk. Council recognises that as a responsible public authority any treasury investments that it does hold should be of relatively low risk. It also recognises that lower risk generally means lower returns
- maintain and increase the real capital value of the external managed funds
- ensure funds are available to meet Council's needs
- maintain professional relationships with the Council's bankers, financial market participants, fund managers, trustees and other stakeholders
- regularly review the performance and creditworthiness of all investments
- maintain procedures and controls and provide timely and accurate financial and management information.

These objectives will be achieved by having regard to:

- the mix of investments that Council will utilise
- the process for the acquisition and divestment of new investments
- the management and assessment of risk
- the need for appropriate management and reporting procedures.

Investment Mix

Council has a portfolio of investments; at any time, these could comprise:

- treasury investments
- direct equity investments
- property
- other property investments – Community Housing
- forestry
- loans, advances for community development purposes
- internal loans
- external managed funds that could include equities.

The decision on which mix of investments Council will hold at any time will be based on the purpose for which the funds were acquired and the market conditions at the time.

Acquisition of New Investments

With the exception of treasury investments and internal loans, new investments are acquired if an opportunity arises and approved by Council resolution, based on advice and recommendations from management. Before approving any new investments, Council gives due consideration to the contribution the investment will make in fulfilling Council's strategic objectives and the financial risks of owning the investment.

The authority to acquire and dispose of treasury investments is delegated to the General Manager of Finance and Assurance.

Application of Returns from Investments

Some returns are earmarked for specific purposes, but generally returns on Council investments are applied to give equal benefit to the District ratepayers by application in a pro-rata basis to offset the costs of District services.

Direct Equity Investments

Nature of Investment

Direct equity investments are held for strategic purposes only and include interests in:

- **Civic Financial Services Limited** (13,715 shares)
  Civic Financial Services is a specialist Local Government insurance company
- **Milford Sound Tourism Limited** (2,000 shares)
  The role of Council is to facilitate and co-ordinate development and operations at Milford Sound/*Piopiotahi* and Council's intention is to retain its shareholding in the company.

Rationale for Holding Investment

The Council may hold equity for non-investment purposes, provided that the holding is in furtherance of its purpose under the Local Government Act 2002.

To have the ability to utilise equity investments where necessary to:

- achieve the desired level of returns; and/or
- to provide a diversified investment portfolio.

Disposition of Revenue

These investments are held for strategic reasons only and not for investment purposes.

As such these investments derive minimal or no revenue to Council in the form of dividends. If they do generate sufficient revenue including dividends, these will be used to offset general rates.

Risk Management

Investments in Civic Financial Assurance Ltd and the Milford Sound Tourism Limited are held for strategic purposes. For any other equity investments, Council reviews the performance of the trading enterprises at least annually to ensure that strategic and financial objectives are being achieved.

Dispositions and acquisitions require Council approval.

Property

Nature of Investment

The Council's first objective is to only own property that is strategically necessary for the economic, physical and social development of the Southland District and secondly, to achieve an acceptable rate of return. Property investments do not include properties for operational purposes.

Rationale for Holding Investment

Council holds investment properties in order to generate income to offset general rates.

The Council reviews the performance of its property investments on an annual basis and ensures that the benefits of continued ownership are consistent with its stated objectives. Any disposition of these investments requires the Council's approval.

Disposition of Revenue

Income generated is used to offset operational expenditure. Surplus funds will be used to fund future property projects.

Risk Management

The risk in respect of holding investment property is evaluated as low given the location of the properties and their current and long-term use.

Rental income is considered low risk, due to the fixed and long-term nature of the lease agreements. Lease rental is negotiated at the time the lease expires.

Dispositions and acquisitions require Council approval.

Other Property Investments - Community Housing

Nature of Investment

Council has 69 community housing units available for rental. These houses are located in various townships across Southland District.

Rationale for Holding Investment

Council retains community housing to allow people to continue to live in its local community. The elderly or people with disabilities are given preference.

Council's philosophies include ensuring that rental charges cover costs (excluding depreciation) and to continue to maintain the housing at its current high standard. There is no required rate of return on this investment.

Disposition of Revenue

Revenue earned from the investment in community housing is retained in the community housing investment.

Risk Management

The risk in respect of holding other property investments is evaluated as low given the location of the properties and their current and long term use.

Council's community housing activities are managed by staff in the Property department. They regularly review Council's involvement in community housing, including assessment of the need for this asset within the community.

Dispositions and acquisitions require Council approval.

Forestry

Nature of Investment

The Council and its predecessor organisations have been involved in forestry for many years. Council's current forestry policy is that it will operate and maintain up to 3,000 planted hectares. The Council currently maintains approximately 1,800 hectares of land.

Rationale for Holding Investment

Forestry assets are held as a long-term investment. The overall investment policy of the Council with regard to forestry is to maximise profit, with harvesting on a sustainable yield basis and without any demand on rates.

Disposition of Revenue

Any surplus revenue is used to offset rates. Any surplus not used in the year it was earned is accumulated into a forestry reserve and used to offset future rates. The use of the reserve in future years, will often be based on an even spread over a number of years to minimise rates fluctuations. Approximately $100,000 is retained for operating working capital at any time.

Risk Management

Forests are currently managed by a specialist external party. Forestry activities are reviewed by the Services and Assets Committee.

Significant risk management strategies include diversity of forest age classes, insurance against fire and access to a rural fire fighting force, a mix of species, geographic spread of forests and controlled access. Retention of the forest is reviewed periodically.

Dispositions and acquisitions require Council approval.

Loans and Advances for community development purposes

Nature of Investment

The Council is not a lender and therefore is not generally involved in providing loans or advances.

Rationale for Holding Investment

Council provides loans for community development purposes. From time to time, Council has provided a loan or advance to a community organisation to facilitate the ongoing provision of community services or recreational opportunities. The loans/investments are not made for financial investment purposes.

Council sets the terms and conditions for any loans or advances as they are granted. Council will require security as deemed appropriate for each loan or advance. The security will be the assets or revenue of the organisation.

Disposition of Revenue

Generally, these loans are to the benefit of the local community and not for financial investment purposes. Interest will be charged at a rate that is consistent with Council's interest rate on internal loans. Any revenue would be applied to reserves, reduce external debt or offsetting general rates.

Risk Management

Council will review the performance of its loan advances on a regular basis to ensure the planned strategic and economic objectives are being achieved.

Council monitors the compliance of the borrower with the terms and conditions agreed upon.

All loans and advances documentation are subject to independent legal review prior to finalisation.

Internal Loans

Nature of Investment

Council may utilise its general reserves and surplus funds for internal borrowing/lending purposes to reduce external debt, thus effectively reducing borrowing costs.

Rationale for Holding Investment

To facilitate the development of Council activities within Council and the community to minimise the costs associated with borrowing externally.

Disposition of Revenue

Income derived from internal loans is generally used to generate a return to reserves. Any surplus income is used to reduce external debt and/or offset against general rates.

Risk Management

Internal loans shall be managed as a treasury investment. Interest rates will be set having regard for Council's opportunity cost forgone.

Council may not achieve the opportunity cost due to actual external interest rates being different to the interest rate set for any given year as part of the LTP/Annual Plan process. In this case the return to Council may be more or less and will impact on the return to reserves.

Treasury Investments

Nature of Investment

To provide the ability to utilise a range of financial investments not already specified in this policy.

Approved treasury investments include:

CATEGORY	INSTRUMENT
Treasury Investments	Call and term bank deposits Bank certificates of deposit (RCDs) Treasury Bills and Government Bonds LGFA bonds/Floating Rate Notes (FRN)/Commercial Paper (CP) LGFA borrower notes

With the exception of LGFA borrower notes, the term of the treasury instruments is no greater than one year.

Rationale for Holding Investment

Council's philosophy in the management of treasury investments is to optimise its capital protection and liquidity objectives while balancing risk and return considerations. Council recognises that as a responsible public authority any treasury investments that it does hold should be low risk. It also recognises that lower risk generally means lower returns.

The Council maintains treasury investments to:

- invest surplus cash and working capital funds
- achieve the desired level of returns within acceptable risk parameters
- invest amounts allocated to special or restricted reserves, trust funds and special funds
    - restricted reserves are the funds that Council have no or very little control over; or hold on behalf of another person or entity
    - a special reserve is when funds are held for a specific purpose, with minimal flexibility on the use and the funds are not being used for a longer purpose/inter-generational.

Council's primary objective when investing is the protection and liquidity of its investment. Accordingly, only credit-worthy counterparties are acceptable. Credit-worthy counterparties are selected on the basis of their current Standard and Poor's (S&P) or equivalent rating, which must be strong or better.

To avoid undue concentration of exposures, treasury investments should be used with as wide a range of counterparties as practicable. Transaction principal amounts and maturities should be well spread where possible.

Within the above constraints, Council also seeks to:

- ensure investments are liquid
- maximise investment return
- manage potential capital losses due to interest rate movements.

Liquidity risk is minimised by ensuring that all negotiable treasury investments must be capable of being liquidated in a readily available secondary market.

Disposition of Revenue

Income derived from Council's treasury activities will be used to fund Council activities including the allocation of interest on reserves, offsetting rates and repaying external debt.

Externally Managed Funds

Nature of Investment

Council may invest its unrestricted reserves in externally managed funds. Council has a medium to long-term investment horizon as it seeks to manage investments in a sustainable and equitable way, having regard to both current and future generations of ratepayers.

Council would purchase units in a NZD managed fund or funds.

Where practical, investments will be made considering the ethical practices of the investment entity. Council's intention for the Funds is to avoid direct involvement with industries that have a negative impact on society and the environment. This includes:

- alcohol

- tobacco
- military/weapons
- labour practices.

Rationale for Holding Investment

Council maintains externally managed funds to:

- maintain, protect and increase the real capital value of the principal amount invested including the unrestricted reserve fund value at the end of a financial year. Real capital value is the value that has been adjusted for the effect of inflation
- maintain liquidity and access to cash if needed
- distribute a portion of returns to subsidise rates revenue.
- diversify the investment of Council's unrestricted reserves. Unrestricted reserves are made up of:
    - general reserves being the funds that are fully under the control of Council, and do not have a specific purpose or any restrictions
    - designated reserves are also controlled by Council, and sourced for a specific purpose, but the funds can be hold for a longer period and withstand longer term investments impacts.

Disposition of Revenue

The managed funds are expected to return (before fees and taxes) at least 5% per annum. Council will consider as part of its planning process what is appropriate to subsidise rates revenue and what should be accrued back to its reserves, having regard to its rationale noted above. The actual disposition may differ from that planned as a result of the actual returns being more or less than budgeted again having regard to the rationale above.

Income derived from managed funds, is generally used to offset general rates with any surplus income used to provide a return on reserves. Surplus income is either re-invested in the managed fund(s) or withdrawn.

Annually, Council will evaluate whether to realise any capital gains that have been accumulated by the managed funds over the period. Overall the objective is to hold the managed funds for the medium to long term.

Risk Management

Council has a preference to invest indirectly in externally managed funds that are managed by a suitably qualified fund manager(s) and be managed within the below criteria.

Council's risk profile is considered moderate for financial investment purposes and therefore seeks to invest in a 'balanced' managed fund where there is a mix of capital growth and income asset types when initially investing with an external fund. Council will buy units in an established externally managed fund but could appoint its own investment manager.

The strategic asset allocation and tactical ranges are provided in the following table:

ALLOCATION	BENCHMARK %	RANGES % ON INITIAL INVESTMENT	RANGE % ON ACTIVE INVESTMENT
Total growth assets	50%	40-60%	35%-65%
Total income assets	50%	40-60%	35%-65%

Growth assets include approved asset types; listed domestic and international equities and listed property shares. Income assets include asset types such as; cash, term deposits, domestic and international floating and fixed rate debt securities. Any other asset types must be approved by Council before any investment is made.

The above initial investment range is the maximum allowed when investing into a managed fund.

Following the approval of initial investment fund manager; there could be a 15% fluctuation due to the asset positioning and market value ranges from time to time. This allows small variations on the initial investment range.

If a fund's allocation falls outside the 35% - 65% range at quarter-end, the deviation must be:

- Formally reported to the F&A Committee,
- Supported with an explanation of the variance and relevant market context,
- Accompanied by the proposed corrective action.

Council will report the average investment across the external funds to determine Council's range on a monthly basis.

Investments may be hedged back to NZD.

The counterparty risk policy set out in section 4 does not apply to externally managed funds. The investment guidelines are set out in Appendix 1.

At least quarterly reporting is provided on the performance of the managed fund(s). Annually the fund performance is benchmarked to other similar funds.

Council approval is required in relation to the amount of funds placed or withdrawn from externally managed funds outside of the approved budget or to change or appoint new external managed funds/fund managers.

4.0 Liability Management

Introduction

This Liability Management Policy has been prepared pursuant to the Local Government Act 2002; section 102(1) which requires the Council to adopt a Liability Management Policy and section 104 which outlines the contents of the policy.

Generally, Council borrows to provide funding for the following activities:

- fund Council capital expenditure requirements
- manage timing differences between cash inflows and outflows
- cover special 'one-off' projects
- fund assets with intergenerational qualities
- manage timing differences in the rebalancing of its internal loan portfolio into externally managed funds.

Total debt levels are determined through Council's Long-Term Plan (LTP) and Annual Plans. Council approves this borrowing requirement for each financial year in the Annual Plan or LTP or by resolution during the year.

Objectives

- ensure Council has appropriate working capital funds available to carry out its plans as outlined in its LTP and Annual Plan
- ensure that Council has an on-going ability to meet its debts in an orderly manner as and when they fall due in both the short and long term, through appropriate liquidity and funding risk management
- arrange appropriate funding facilities for Council, ensuring they are at market related margins utilising bank debt facilities and/or capital markets as appropriate
- maintain lender and LGFA relationships and Council general borrowing profile in the local debt and, if applicable, capital markets, so that Council is able to fund its activities appropriately at all times
- control Council's cost of borrowing through the effective management of its interest rate risks, within the interest rate risk management limits established by this policy
- ensure compliance with any financing/borrowing covenants and ratios
- maintain adequate internal controls to mitigate operational risks
- produce accurate and timely reports that can be relied on by senior management and Council for control and exposure monitoring purposes in relation to the debt raising activities of Council.

Council will manage its borrowing activities prudently to ensure the best interests of the District are maintained. To undertake this, the following will be considered in conjunction with every transaction undertaken:

- cost minimisation
- cost stabilisation/risk management.

Specific Borrowing Limits

Total debt levels are maintained at a prudent level and will be managed within the following limits:

ITEM	BORROWING LIMIT
Net debt as a percentage of total revenue	<175%
Net interest as a percentage of total revenue	<10%
Net interest as a percentage of rates revenue	<15%
Liquidity (external, borrowing +available committed loan facilities + available liquid investments as a percentage of existing external debt)	>110%

- **total revenue** is defined as cash earnings from rates, government grants and subsidies, user charges, interest, dividends, financial and other revenue and excludes non-government capital contributions (e.g. developer contributions and vested assets)
- **net debt** is defined under the financial prudence regulations as financial liabilities less financial assets (treasury investments, managed funds). External debt that is specific borrowing for on-lending to a CCO/CCTO is netted with the corresponding loan asset for the LGFA covenant calculation
- **financial liabilities** in relation to net debt include
    - external loans
    - employee entitlements and benefit liabilities
    - contract retentions and deposits
    - development and financial contributions
- **financial assets** in relation to net debt is

- treasury investments
- externally managed funds
- investments in associates

- **net interest** is defined as the amount equal to all interest and financing costs less interest income for the relevant period
- **annual rates revenue** is defined as the amount equal to the total revenue from any funding mechanism authorised by the Local Government (Rating) Act 2002 together with any revenue received from other local authorities for services provided (and for which the other local authorities rate)
- **liquid investments** are unencumbered assets defined as being:
  - overnight bank cash deposits
  - wholesale/retail bank term deposits no greater than 31 days
  - bank issued registered certificates of deposit less than 181 days
  - managed equity funds accessible within 30 days.
- external debt funding and associated investment activity relating to pre-funding is excluded from the liquidity ratio calculation
- financial covenants are measured on Council only
- disaster recovery requirements are to be met through the liquidity ratio.
- the definitions above are based on financial prudence regulations. The definitions and formula for LGFA have a different methodology. Council must also comply with these covenants too. This is attached to the policy as appendix 2. Council has an obligation to comply with both.

Debt Repayment

Debt levels are indicated through Council's LTP or Annual Plans. Council's Annual Report will contain information to allow actual debt levels to be compared with those forecasted.

Loans raised for specific projects will generally be repaid through user charges or rates. Loans raised for local purposes will generally be repaid by the ratepayers in the relevant local area. Surplus Council funds and proceeds from the sale of investments and assets will be reviewed periodically by Council with a view to repaying debt, or for funding capital projects.

The Council may repay debt before maturity in special cases where the circumstances suggest that this would be in the best interests of the District.

Debt will be repaid as it falls due in accordance with the applicable borrowing arrangement. Subject to the appropriate approval and debt limits, a loan may be rolled over or re-negotiated as and when appropriate.

Guarantees/contingent liabilities and other financial arrangements

Council may act as a guarantor to CCOs, financial institutions on loans when the purposes of the loan are in line with Council's strategic objectives.

For any outstanding guarantees, Council will ensure that sufficient financial capacity exists relative to LGFA lending covenants. Unless approved by Council, guarantees or financial arrangements given will not exceed NZ$1 million in aggregate.

Council is not permitted to provide any guarantee of indebtedness in favour of any loans to CCTOs under Section 62 of the Local Government Act.

For any guarantee for indebtedness provided by Council to a CCO that borrows directly from the LGFA or bank lender, Council will approve the specific borrowing and guarantee arrangement.

Internal Loans

All Council investments may be used as a source for internal loans in relation to expenditure of a capital (or one off) nature related to any activity that would otherwise be funded by external loan.

The term of any internal loan shall not be more than 30 years and will be set after taking into account the ability of ratepayers affected, to pay, alternative uses of the funds and the life of the assets to be funded. The term set will be subject to review during the course of the loan.

The interest rate to be applied to internal loans for any given year will be developed as part of Council's Long-Term Plan or Annual Plan. To remove any doubt, the interest rate calculated will be the interest rate used for that year for budgeting and the calculation of any end of year actual results.

The method of calculation and the resulting interest rate will be resolved by Council as part of this annual process. In developing the method of calculation, Council will consider its investment policy objective, which is to obtain the net opportunity cost of not having the funds invested externally. Council will also consider its present and future financial position as well as market conditions.

After taking into account fairness and equity, Council can resolve to apply a lesser interest rate than the interest rate calculated where it agrees the circumstances are such that it is warranted.

Security

It is Council's general policy to offer security for its borrowing and risk management activities by way of negative pledge or a charge over its rates offered through a Debenture Trust Deed. Under a Debenture Trust Deed, Council's borrowing is secured by a floating charge over all Council rates levied under the Local Government Rating Act. The security offered by Council ranks equally or pari passu with other lenders.

In the normal course, the Council's policy is not to offer a guarantee or security over any of the other assets of the Council. However, the Council may decide to offer security over the asset:

- where borrowing is by way of finance lease, or some other form of trade credit under which it is normal practice to provide security over the asset concerned, or
- where the Council considers doing so would help further its community goals and objectives.

Any lending to a CCO or CCTO will be on a secured basis and be approved by Council.

Interest Rate Exposure

Interest rate risk management refers to managing the impact that movements in interest rates can have on Council's cash flows. This can have both a positive and/or negative impact. For each $10 million of borrowings a 1% increase in interest rates increases Council's borrowings costs by $100,000 (0.78% impact on rates of $78 million).

The primary objective of interest rate risk management is to reduce uncertainty relating to interest rate movements through fixing/hedging of wholesale interest costs. Certainty around interest costs is to be achieved through the proactive management of underlying interest rate exposures.

When actual debt amounts are at $20 million or above it is mandatory that the interest rate exposures of Council are managed according to the limits detailed in the following table. Council's gross external core debt forecasts (less any pre-funded debt amounts) must be within the following fixed/floating interest rate risk control limits:

FIXED RATE HEDGING PERCENTAGES		
Term (months)	**Minimum Fixed Rate Amount**	**Maximum Fixed Rate Amount**
0 - 12 months	40%	90%
13 - 24 months	40%	90%
25 - 36 months	35%	85%
37 – 48 months	30%	80%
49 – 60 months	25%	75%
61 – 72 months	20%	70%
75 – 84 months	0%	65%
85 – 96 months	0%	60%
97 – 108 months	0%	50%
108 – 120 months	0%	50%
121 – 132 months	0%	50%
133 – 144 months	0%	25%
145 – 156 months	0%	25%
157 – 168 months	0%	25%
169 – 180 months	0%	25%
181 – 192 months	0%	25%

The fixed interest rate percentage is calculated based on the average amount of fixed rate obligations relative to the average gross external debt for a given period:

This calculation should be conducted on a rolling 12-month basis, reflecting average exposures over time.

This approach provides a consistent, forward-looking measure of interest rate risk, aligned with the Council's forecast borrowing requirements.

For interest rate risk measurement and management purposes, the Group manager finance and assurance can approve a rebased, gross external debt forecast for the interest rate risk management purposes, down to 80% of the approved debt position forecasted in the LTP. This allows for changes to the capital expenditure program that can change over time.

Fixed rate is defined as all known interest rate obligations on forecast external core debt, including where hedging instruments have converted floating rate obligations into firm commitments.

Floating rate is defined as any interest rate obligation subject to movements in the applicable reset rate.

Gross forecast external core debt is the amount of total external debt for a given period. This allows for pre-hedging in advance of projected physical drawdowns of new debt. When approved forecasts are

changed, the amount of fixed rate cover in place may have to be adjusted to ensure compliance with the Policy minimums and maximums. Pre-funded debt amounts are excluded from the gross debt forecast.

Core debt is defined as debt that is expected to remain for a period of greater than one year.

A fixed rate maturity profile that is outside the above limits, but self corrects within 90-days is not in breach of this Policy.

If the Group manager finance and assurance has approved a funding and interest rate strategy; that is executed within 90 days of a limit being breached; that will bring the interest rate risk position back into policy compliance then the policy is not in breach. This strategy must provide for other debt funding maturity limits.

If the approved strategy is not achieved under the above criteria then approval is required by the F&A Committee or approved interest rate instruments, such as interest rate swaps (or other hedging instruments) should be used to restore policy compliance.

Any fixed rate hedge with a maturity beyond 15 years must be approved by Council. The exception to this will be if Council raises LGFA funding as fixed rate or as a swapped floating rate and this maturity is beyond 15 years.

Hedging outside the above risk parameters must be approved by Council.

Approved interest rate instruments are as follows:

CATEGORY	INSTRUMENT
Interest rate risk management	Forward rate agreements ("FRAs") on: • bank bills Interest rate swaps/collars including: • swap extensions, deferrals and shortenings Interest rate options on: • bank bills (purchased caps and one for one collars) • interest rate swaptions (purchased swaptions and one for one collars only)

- one for one collar option structures are allowable, whereby the sold option is matched precisely by amount and maturity to the simultaneously purchased option. During the term of the option, only the sold side of the collar can be closed out (i.e. repurchased) otherwise, both sides must be closed simultaneously. The sold option leg of the collar structure must not have a strike rate 'in-the-money';
- selling interest rate options for the primary purpose of generating premium income is not permitted because of its speculative nature;
- purchased borrower swaptions must mature within 12 months;
- Interest rate options with a maturity date beyond 12 months that have a strike rate (exercise rate) higher than 2.00% above the appropriate swap rate, cannot be counted as part of the fixed rate cover percentage calculation;
- forward start period on swaps and collars to be no more than 36 months from deal date except where the forward start swap/collar starts on the expiry date of an existing swap/collar and has a notional amount which is no more than that of the existing swap/collar.

Any other interest rate instrument must be specifically approved by Council on a case-by-case basis and only be applied to the one singular transaction being approved. Credit exposure on these financial instruments is restricted by specified counterparty credit limits.

Prudent selection of interest rate instruments and mix will help the Council achieve its low debt servicing costs and risk minimisation objectives.

Liquidity and Funding Risk Management

Liquidity management refers to the timely availability of funds to Council when needed, without incurring penalty costs. This takes into account the ability to refinance or raise new debt at a future time at the same or more favourable pricing and terms of existing facilities.

Council's ability to readily attract cost effective borrowing is largely driven by its ability to rate, maintain a strong credit rating and manage its relationships with the LGFA and financial institutions. To this end it is the Council's intention to seek and maintain a strong balance sheet position.

Council may use a mixture of short-term facilities (which generally have lower credit margins) as well as longer term facilities to achieve an effective borrowing mix, balancing the requirements of liquidity and cost.

Council's objective for funding risk management is to minimise the risk of large concentrations of debt being reissued or raised at a time of adverse movements in borrowing margins beyond the Council's control.

The Council's policy for liquidity and funding risk management is:

- ensuring that Council's committed debt facilities and term loans mature over a wide time period
- external debt plus available committed debt facilities, plus liquid assets must be maintained at an amount of at least 110% over existing external debt
- through the LGFA and bank lenders, diversify borrowing over a range of wholesale investors and lenders
- ensuring that bank borrowings are only sought from approved strongly rated New Zealand registered banks
- matching expenditure closely to its revenue streams and managing cash flow timing differences
- maintaining its treasury investments in cash/cash equivalent liquid investments
- Council has the ability to pre-fund up to 18 months of the forecast debt requirements including re-financings.

When actual debt amounts are at $20 million or above it is mandatory that the following limits apply for managing funding risk. The maturity profile of the total committed funding in respect to all external debt and committed debt facilities is to be controlled by the following system:

PERIOD	MINIMUM %	MAXIMUM %
0 to 36 months	15	60
37 to 84 months	25	85
85 months plus	0	60

A funding maturity profile that is outside the above limits, but self corrects within 90-days is not in breach of this Policy. However, maintaining a maturity profile outside of policy limits beyond 90-days requires specific approval by Council.

To minimise concentration risk, the LGFA requires that no more than the greater of NZD 100 million or 33% of a Council's borrowings from the LGFA will mature in any 12-month period.

Approved debt and liquidity instruments include;

CATEGORY	INSTRUMENT
Cash management, liquidity and borrowing	Bank overdraft Committed cash advance and bank accepted bill facilities (short term and long-term loan facilities) Floating Rate Note (FRN) Fixed Rate Note (MTN) Commercial paper (CP)/Promissory notes

Credit Risk Management

Counterparty credit risk is the risk of losses, realised or unrealised, arising from a counterparty defaulting on a financial instrument where the Council is a party. Treasury investments, interest rate and foreign currency instruments are captured within the policy. The credit risk to the Council in a default event will be weighted differently depending on the type of instrument entered into.

Amounts should be spread amongst a number of counterparties to avoid concentrations of credit exposure.

Credit risk is minimised by placing maximum prescribed limits for each broad class of non-Government issuer and by limiting investments and risk management instruments to registered banks that have a credit rating from a recognised international credit rating agency. The limit system is as follows;

COUNTERPARTY/ISSUER	MINIMUM S&P LONG TERM/SHORT TERM CREDIT RATING	TOTAL MAXIMUM COMBINED LIMIT PER COUNTERPARTY ($MILLION)*
NZ Government	AA+/A-1+	Unlimited
NZ Local Government Funding Agency	AA/A-1	Unlimited
NZ Registered Bank (per bank)	AA /AA-/A-1	15.0
NZ Registered Bank (per bank)	A+/A/A-1	7.5
* This combined total maximum limit includes exposure to the counterparties including treasury investments and risk management instruments and excludes externally managed fund(s).		

In determining the usage of the above gross limits, the following weightings will be used:

- treasury investments (e.g. bank term deposits) – transaction principal amount
- interest rate risk management (e.g. swaps, FRAs) – transaction notional x maturity (years) x 3%
- foreign exchange risk (e.g. forward exchange contract) – transaction face value amount x ((square root of the maturity (years)) x 15%).

Each transaction should be entered into a treasury spreadsheet and a quarterly report prepared to show assessed counterparty actual exposure versus limits. Credit ratings are reviewed on an ongoing basis and in the event of material credit downgrades should be immediately reported to the General Manager of Finance and Assurance and assessed against exposure limits. If any counterparty's credit rating falls below the minimum specified in the above table, then all practical steps are taken to eliminate the credit exposure to that counterparty as soon as practicable.

A maximum combined value that is within $5 million the above limits for the Registered Bank that Council holds the operating bank accounts with, and is self-corrected within 20-days of month end; when rates are being received, therefore is not in breach of this Policy.

Counterparties exceeding limits beyond the operational clause should be reported to Council.

Foreign currency

Council has foreign exchange exposure through the occasional foreign exchange transactions that Council may undertake such as plant and equipment.

Significant commitments for foreign exchange can be hedged using foreign exchange contracts, once expenditure is approved. Forward exchange contracts can be used by the Council. The majority of these transactions would be small and would carry no significant foreign exchange risk.

Council does not borrow or enter into incidental arrangements within or outside New Zealand in currency other than New Zealand currency.

5.0 Other Treasury Management

Council-controlled organisations and council-controlled trading organisations Investments and Borrowing mechanisms

To better achieve its strategic and commercial objectives, Council may provide financial support in the form of debt funding directly or indirectly to CCO/CCTOs.

Guarantees of financial indebtedness to CCTOs are prohibited, but financial support may be provided by subscribing for shares as called or uncalled capital.

Any lending arrangement to a CCO/CCTO must be approved by Council. In recommending an arrangement for approval the General Manager of Finance and Assurance considers the following:

- credit risk profile of the borrowing entity, and the ability to repay interest and principal amount outstanding on due date
- impact on Council's credit standing, debt cap amount (where applied), borrowing limits with the LGFA and other lenders and Council's future borrowing capacity
- the form and quality of security arrangements provided
- the lending rate given factors such as; CCO/CCTO credit profile, external Council borrowing rates, borrower note and liquidity buffer requirements, term etc
- lending arrangements must be documented on a commercial arm's length basis. A term sheet, including matters such as borrowing costs, interest payment dates, principal payment dates, security and expiry date is agreed between the parties
- accounting and taxation impact on-lending arrangement.

All lending arrangements must be executed under legal documentation (e.g. loan, guarantee) reviewed and approved by Council's independent legal counsel.

Local Government Funding Agency Limited (LGFA) and/or Central Government

Despite anything earlier in this Investment Policy, Council may invest in shares and other financial instruments of the New Zealand LGFA or Central Government and may borrow to fund that investment. The Council's objective in making any such investment will be to:

- contribute a portion of its borrowing back to the LGFA as an equity contribution to the LGFA
- obtain a return on the investment; and
- ensure that the LGFA has sufficient capital to remain viable, meaning that it continues as a source of debt funding for the Council.

Because of this dual objective, Council may invest in LGFA shares or Central Government in circumstances in which the return on that investment is potentially lower than the return it could achieve with alternative investments.

If required in connection with the investment, Council may also subscribe for uncalled capital in the LGFA.

Despite anything earlier in this Liability Management Policy, Council may borrow from LGFA or Central Government and, in connection with that borrowing, may enter into the following related transactions to the extent it considers necessary or desirable:

- provide guarantees of the indebtedness of other local authorities to the LGFA and of the indebtedness of the LGFA itself
- commit to contributing additional equity (or subordinated debt) to the LGFA if required
- subscribe for shares and uncalled capital in the LGFA secure its borrowing from the LGFA and the performance of other obligations to the LGFA or its creditors with a charge over the Council's rates and rates revenue.

Suspensory loan as a liability to Central Government, where if certain conditions are met, the loan is forgiven, and the funds are treated as income. If the conditions are not met, then the loan would remain as debt and the required repayments and obligations must be fulfilled.

Central Government holds 5,000,000 shares in LGFA, therefore a portion of the LGFA debt is funded by Central Government.

6.0 Procedures for Management and Reporting

Cash Management

The finance function is responsible for managing the Council's cash surpluses and/or deficits.

The Council maintains rolling daily, monthly and annual cash flow projections which form the basis of its cash management activity. The Council maintains one main bank account for its operating cash flows as well as other bank accounts for specialist activities such as investment and borrowing requirements. Individual business units within the Council do not maintain separate bank accounts.

The Council manages its working capital balances by matching expenditure closely to its revenue streams and managing cash flow timing differences to its favour. Daily bank balances are extracted by the Finance Officer.

Generally, cash flow surpluses from timing differences are available for periods less than 90 days.

Cash management activities must be undertaken within the following parameters:

- an optimal daily range of $10,000 is targeted for in the Council's main bank account, with investments adjusted to balance the current account if required
- cash flow surpluses are placed in call deposits, term deposits, registered certificates of deposits and promissory notes
- amounts invested must be in approved instruments and within approved credit limits
- the Council has a minimum requirement of holding $5,000,000 for working capital purposes which is used on an operational basis
- the use of interest rate risk management on cash management balances is not permitted.

Internal Controls

The Council's systems of internal controls over cash management and treasury activity includes adequate segregation of duties among the core treasury functions of deal execution, confirmation, settling and accounting/reporting.

Key internal cash management controls are as follows:

- electronic banking signatories - dual signatures are required for all electronic transfers
- authorised personnel - all counterparties are provided with a list of personnel approved to undertake transactions, standard settlement instructions and details of personnel able to receive confirmations
- reconciliations – a general bank reconciliation is performed daily and a general ledger reconciliation is performed monthly by the Debtors Officer (or equivalent) and reviewed by a senior finance staff member.

There are a small number of people involved in treasury activity. Accordingly, strict segregation of duties is not always achievable. The risk from this is minimised by the following processes:

- a documented discretionary approval process for treasury activity
- regular management reporting
- operational risk control reviews will be undertaken periodically
- appropriate organisational, systems, procedural and reconciliation controls exist to ensure:
  (a) all treasury activity is bona fide and properly authorised;
  (b) checks are in place to ensure the Council's accounts and records are updated promptly, accurately and completely.

The details of any exceptions, including remedial action taken or intended to be taken.

Legal risk

Legal risks relate to the unenforceability of a transaction due to an organisation not having the legal capacity or power to enter into the transaction usually because of prohibitions contained in legislation. While legal risks are more relevant for banks, Council may be exposed to such risks.

Council will seek to minimise this risk by adopting policy regarding:

- the use of standing dealing and settlement instructions (including bank accounts, authorised persons, standard deal confirmations, contacts for disputed transactions) to be sent to counterparties
- the matching of third-party confirmations and the immediate follow-up of anomalies
- the use of expert advice.

Financial instruments can only be entered into with banks that have in place an executed International Swaps and Derivatives Association (ISDA) Master Agreement with Council.

Council's internal/appointed legal counsel must sign off on all documentation.

Council must not enter into any transactions where it would cause a breach of financial covenants under existing contractual arrangements.

Council must comply with all obligations and reporting requirements under existing funding facilities and legislative requirements.

Reports

The following reports are produced to monitor treasury activity and assist Council to understand how the function is performing. Any exceptions involving actions taken outside the scope of this Policy must be reported to the Chief executive and Group manager finance and assurance.

REPORT NAME	FREQUENCY	PREPARED BY	RECIPIENT
Daily Cash Position (Part of daily reconciliation)	Daily	Finance officer or equivalent	Senior finance staff member
Daily Cash flow forecast to reconcile to annually	Weekly	Senior accountant	Financial accountant
Weekly cash flow to reconcile to annual budget/projection	Monthly	Financial accountant	Financial controller Group manager finance and assurance
Treasury Exceptions Report	As required	Finance officer or equivalent	Senior finance staff member
Treasury Report *(reporting both the financial prudence limitations and LGFA covenants)* Policy limit compliance Borrowing limits Funding and Interest Risk Position Total debt funding facility utilisation New treasury transactions Cost of funds vs budget (interest/borrowing costs vs budget) Liquidity risk position Counterparty credit Debt maturity profile Renewal investment Operating investment Exceptions	Monthly	Financial accountant	Financial controller Group manager finance and assurance
Treasury Report Include monthly report along with; External managed funds report	Quarterly	Financial accountant	Group manager finance and assurance **and**

REPORT NAME	FREQUENCY	PREPARED BY	RECIPIENT
A statement of policy compliance Treasury and markets commentary Treasury performance CCO/CCTO loans and guarantees, financial arrangements Revaluation of financial instruments			Finance and Assurance Committee
Trustee Report	As required by the Trustee	Financial accountant	Financial controller Chief executive Trustee company
LGFA Report	Annual	Financial accountant	Financial controller Chief executive LGFA

Key focus areas of treasury management

The following performance measures have been prescribed by Council as the core deliverables.

These provide a direct measure of the performance of the treasury function (operational performance and management of debt and interest rate risk) are to be reported to Council or an appropriate sub-committee of Council on a quarterly and YTD basis

- all treasury limits must be complied with including (but not limited to) counterparty credit limits, dealing limits and control limits
- all treasury deadlines are to be met, including reporting deadlines
- the actual borrowing cost for Council (taking into consideration costs of entering into interest rate risk management transactions) should be below the budgeted borrowing costs
- the actual investment return for Council on the external managed funds are above the budget investment return amounts
- annually the actual total return on the externally managed funds is compared to average annual total return of peer 'balanced' managed funds.

Appendix 1 – External Managed Funds - Investment Guidelines

The guidelines and constraints required by Council to be observed by the managed funds or Investment Manager, as applicable are set out below. For the purposes of these constraints, "Funds" shall relate to the portion of the investment assets under the management of the Investment Managers.

Where the Funds are invested into an external managed fund(s) or collective investment vehicle ("units") or product Council recognises that the strict application of these guidelines and constraints may not be possible. The Manager(s) of the externally managed funds will inform Council of its pooled or collective investment guidelines. Council expect the Manager(s) to inform them of any investment or management practice that materially falls outside the guidelines and constraints so that Council can continually reassess the overall suitability of such an investment approach.

Cash and Term deposits

Council may invest cash in bank, call, term deposits or registered certificates of deposit. Where it does so it may invest in the following:

Bank, call, term deposits and registered certificates of deposit with New Zealand Registered Banks with a Standard and Poor's or equivalent credit agency, short term credit rating of 'A-1' or stronger. Bank term deposits have a maturity date of no greater than 3-years.

To be classified as a cash investment, deposits must have a maturity date of 31 days or less. Both bank term deposits and registered bank bills must have a maturity date of no more than 12 months.

New Zealand and International Fixed Interest

Investment in an unsecured, senior or secured debt security and should have a minimum long-term credit rating of no less than BBB or short-term credit rating of A-2, as measured by Standard & Poor's, or equivalent credit agency.

Commercial Paper issued by a corporate borrower, with a Standard and Poor's or equivalent credit agency, short term credit rating of 'A-2' or stronger. The maturity date can be no more than 12 months.

No investments in direct mortgages, subordinated debt, structured debt, high yield/junk bonds and leveraged loans should be made.

Equities

Investments must be confined to publicly listed widely held securities trading in recognised markets.

New Zealand and International Property Investments

Investment in property entities that are listed on the New Zealand or internationally recognised Stock Exchange.

Appendix 2 – LGFA Covenant definitions

This is an extract from the LGFA covenant Definitions released in February 2022.

When councils borrow from LGFA they agree to comply with the financial covenants contained in the following table:

FINANCIAL COVENANTS	LENDING POLICY COVENANTS	FOUNDATION POLICY COVENANTS
Net Debt / Total Revenue	<175%	<280%
Net interest / Total Revenue	<20%	<20%
Net interest / Annual Rates Income	<25%	<30%
Liquidity	>110%	>110%

ALTERNATIVE NET DEBT / TOTAL REVENUE COVENANT	
FINANCIAL YEAR ENDED	**NET DEBT / TOTAL REVENUE**
30 June 2020	<250%
30 June 2021	<300%
30 June 2022	<300%
30 June 2023	<295%
30 June 2024	<290%
30 June 2025	<285%

As set out in the table above there are two set of covenants that can apply to a council:

- The first are the "lending policy covenants". If you are a council who does not have an external credit rating, these apply.
- The second are the "foundation policy covenants". If you are a council who has an external credit rating these apply. This is a rating from one of the major credit rating agencies (Standard & Poors, Fitch or Moody's). There is also a requirement for the external rating to be at least "A" or higher.

Each year a council that borrows from LGFA is required to provide a compliance certificate signed by an authorised signatory by **30 November.** The certificate shall certify as to the council's compliance with the financial covenants as at 30 June (the balance date of the council).

LGFA's financial covenants and the definition of how they are calculated form part of LGFA's Foundation Policies. Foundation Policies can only be changed with the approval of LGFA's shareholders.

The financial covenants are measured at the parent level of the council (not the consolidated group). However, following changes approved by Shareholders in November 2018, a council can now apply to LGFA to have their covenants measured at the group level if this would be a more logical approach. LGFA would see this as being appropriate where a council has some or many of their core council activities hold within CCO's.

The definitions that are set out in the Foundation Policies are as follows:

Total Revenue is defined as cash earnings from rates, grants and subsidies, user charges, interest dividends, financial and other revenue and excludes non-government capital contributions (e.g. developer contributions and vested assets).

Net Debt is defined as total debt less liquid financial assets and investments.

Liquidity is defined as external debt plus committed loan facilities plus liquid investments divided by external debt.

Net Interest is defined as the amount equal to all interest and financing costs less interest income for the relevant period.

Annual Rates Income is defined as the amount equal to the total revenue from any funding mechanism authorised by the Local Government (Rating) Act 2002 together with any revenue received from other local authorities for services provided (and for which the other local authorities rate).

Over recent years LGFA has received a number of questions as to how some of the definitions should be interpreted. To help councils with their covenant calculations LGFA has provided some clarification. This is important as LGFA wants all member councils to calculate their covenants on the same basis.

Total Revenue: From a council's revenue there are two key items that are excluded. The first is non-government capital contributions. This includes development contributions and any donations (such as from a Trust for a community project). These are excluded as they are deemed to be non-re-occurring. The second key item that is excluded is any non-cash flow items. This includes vested assets, found assets, revaluation of derivatives and any revaluation of assets (including revaluation of investment property, forestry and investment portfolios). In addition, any funding revenue received from the Infrastructure Funding and Financing model cannot be included as the debt associated with this is also not included.

Net Debt: For calculating net debt LGFA allows the deduction of cash, term deposits and any investments held within investment portfolios (whether these are ring fenced or not). Investment portfolios might typically include listed equities, fixed interest securities, listed property securities or units in managed funds. LGFA borrower notes can be deducted. Any council lending to a council CCO or CCTO can also be deducted but only where the CCO or CCTO is a going concern and not dependent upon council financial support. Any mark to market losses that exist with interest rate swaps should not be added to debt. Likewise, any revaluation gains cannot be deducted from debt. LGFA generally consider leases to be a form of debt. However, the nature of leases can differ. For a council with any material leases (not photo-copiers etc), they should contact LGFA to agree upon the treatment.

Liquidity: Councils can include the unutilised portion of committed standby facilities, cash, term deposits, any longer-term fixed interest securities that can be sold, any listed equities that are non-core that can be sold. Any loans to CCO's/CCTO's (that is a going concern) that mature within 12 months and will not be re-financed by the council can also be included. Councils cannot include LGFA borrower notes as they are deemed not to be liquid.

Net Interest: Gross interest is calculated by adding together the value of all a councils financing costs including interest costs on debt, costs of derivatives (but not any unrealised mark to market movements) and any costs on committed bank facilities. The finance component of a lease payment may also be part of a council's interest cost. This needs to be agreed with LGFA. To calculate net interest councils can deduct any interest earned on cash, term deposits, fixed interest and dividends on non-core listed equities. Councils cannot deduct any foreign exchange gains or unrealised gains on investments.

Annual Rates Income: In addition to rates revenue, councils can add on any revenue received from income for which other council's rates. The most common of these will be volumetric water charges.

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Draft Dog Control policy and bylaw review - deliberations

Record no: R/25/7/36424
Author: Ana Bremer, Senior policy analyst
Approved by: Vibhuti Chopra, Group Manager Strategy and Partnerships/Acting Chief Executive

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 The purpose of this report is to provide information to Council so it can deliberate and make decisions on matters raised through the consultation process for the draft Dog Control Policy (draft policy) and draft Dog Control Bylaw (draft bylaw).

Executive summary

2 Staff have undertaken a review of the Dog Control policy and bylaw.

3 At a meeting on 22 February 2022 Council endorsed a statement of proposal (see attachment A), which included the draft policy and draft bylaw, for public consultation. Submissions were accepted between 12 May 2025 and 13 July 2025.

4 At a meeting on 30 July 2025, Councillors were given a copy of the 150 submissions that were received on the draft policy and bylaw and heard 8 submitters who wished to speak. Key areas of feedback received in submissions were summarised in the Hearings information and submissions summary report, which also had the submissions booklet attached (R/25/7/34331).

5 Public and Community Board feedback has resulted in recommendations (addressed in this report) which staff have assessed to require further consultation.

6 In the current report, staff have presented and discussed two potential options on how Council could proceed:

- Option 1 – to deliberate matters consulted on, and direct staff to undertake further consultation on matters raised through feedback, to bring the draft Dog Control Policy and Bylaw back for further deliberation and adoption after this further consultation has been completed, in the new triennium.

- Option 2 – that Council deliberate matters consulted on, to allow the draft dog control policy and dog control bylaw to progress to adoption. And that a subsequent amendment process will take place to further consider suggestions received through public consultation.

7 Staff are seeking a decision from Council to choose its preferred approach on how it would like to proceed.

8 If Council proceed with Option 1, the draft policy and bylaw will be reconsidered by staff and a consultation plan will be developed to seek feedback on options submitted through public consultation.

9 If Council chooses Option 2, Council will consider matters consulted on and proceed on the basis that a subsequent amendment process will take place, at a later date, to consider suggestions received through public consultation.

10 Regardless of option taken, the potential significance of changes proposed requires Council under the Dog Control Act 1996 to undertake further public consultation with all persons affected or have an interest in the decision using the special consultative procedure, including the development of a statement of proposal and one-month (or more) public consultation period.

Recommendation

That the Council:

a) receives the report titled "Draft Dog Control policy and bylaw review - deliberations".

b) determines that this matter or decision be recognised as significant in terms of Section 76 of the Local Government Act 2002.

c) determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) determines, pursuant to section 155(1) of the Local Government Act 2002, that a bylaw is the most appropriate way of addressing the problem of dog control in the Southland District.

e) considers the feedback received on the draft Dog Control policy and bylaw.

f) agree Option 2 – that Council deliberate matters consulted on, to allow the draft dog control policy and dog control bylaw to progress to adoption. And that a subsequent amendment process will take place to further consider suggestions received through public consultation.

g) For the matters consulted on, agree:

i. **that Waikawa Curio Bay Road from the Cook Creek access to the beach, southward, is classified as 'dogs on-leash'**
ii. **the Council land between the campground and Ara Pahu subdivision is classified as 'dogs prohibited'**
iii. **the Council land north of Mair Road is classified as 'dogs prohibited'**
iv. **the area of Porpoise Bay beach from Cook Creek southward to the reserve area and out to the mean low water springs (shoreline) is classified as 'dogs prohibited'**
v. **the inclusion of the definitions for 'effective control' and 'public place'**
vi. **Te Anau Town Centre area, currently classified as 'dogs prohibited', is changed to 'dogs on lead'**
vii. **there is no change to the Wyndham dog exercise area.**

h) agree the inclusion of the definition of 'working dogs' as per the Dog Control Act 1996 as suggested by public feedback

Background

The current policy and bylaw

11 The current policy and bylaw became operative in August 2015 and require review before August 2025.

12 The intention of the policy is to strike the proper balance between the need to control dogs and the recognition of the overall benefits of responsible dog ownership. The bylaw gives effect to the policy and enables regulatory and enforcement measures.

13 Section 10 of the Dog Control Act 1996 (the Act) requires that every territorial authority must adopt, in accordance with the special consultative procedure set out in section 83 of the Local Government Act 2002, a policy in respect of dogs in the district of the territorial authority.

14 In adopting the policy, Council must have regard to

a) The need to minimise danger, distress, and nuisance to the community generally

b) The need to avoid the inherent danger in allowing dogs to have uncontrolled access to public places that are frequented by children, whether or not the children are accompanied by adults

c) The importance of enabling, to the extent that is practicable, the public (including families) to use streets and public amenities without fear of attack or intimidation by dogs

d) The exercise and recreational needs of dogs and their owners.

15 Under s10(6), Council may use a bylaw to give effect to the policy. The bylaw must be reviewed at the time the policy on dog control is reviewed.

Review

16 Staff undertook a pre-engagement survey which sought to notify the public that Council's Dog Control Bylaw and Policy are being reviewed, and to gather information about how dog control is experienced within the District.

17 The survey ran from Friday 20 September to Monday 14 October 2024 on Council's online Make It Stick portal, and resulted in 806 survey views, with around 600 completed responses.

18 Staff used feedback from survey results, and community board feedback, to develop the draft policy and bylaw. On 30 April 2025 Council approved the Draft Dog Control Policy 2025 and Dog Control Bylaw 2025 for public consultation.

19 The public consultation period ran from 12 May until 13 July 2025. 149 submissions were received during the public consultation period. One submission was received outside of the consultation period.

20 Council heard eight submitters who elected to speak in relation to their submissions on 30 July 2025.

21 This report summarises feedback received, provides an assessment of issues and options in consideration of this feedback, along with recommendations and a revised draft policy and bylaw for Council to consider for endorsement to adopt at its next meeting scheduled for 10 September 2025.

Issues

22 As there are a number of separate distinct issues for Council to consider in response to community feedback, a separate issues and options paper has been produced, which is included with this report as **Attachment A.**

23 The issues and options paper clearly outlines each issue that has arisen in relation to the draft policy and bylaw. For each issue, background information is given, there is a summary of community views, a discussion of the issue, and options are presented. Where relevant the recommendations provided by staff in this report are included within the revised draft policy and bylaw attached.

General themes received from submissions

24 The following themes were present in general comments from submissions:

- The need to develop dog parks in specific towns
- General non-compliance of dog owners
- General comments about enforcement and fees
- Improvement in dog control reporting systems and enforcement required.

25 Specific issues have been summarised in the following table, with staff assessment provided.

Issue provided in submission	Staff assessment
Ohai: Ohai rugby grounds could be used for designated dog exercise area	Staff are aware the rugby grounds may no longer be in use. This requires further consultation.
Nightcaps: Issues with signage on the racetrack	Feedback will be provided to Environmental Health team for consideration
Tuatapere: Concerns about dogs on the Tuatapere domain – there should be no dogs	Feedback will be provided to Environmental Health team for consideration
Winton: Amend the bylaw to allow dogs off-leash *under control* on the Winton Walking Track	The current bylaw and policy allow for dogs on-leash on the Winton Walkway, which balances the needs of all users of this walkway. **There is no change recommended.**
Winton: Council should allocate adequate space and develop a dedicated dog exercise park where dogs can legally and safely run off-leash	**This requires further investigation, planning and development by staff, and further public consultation**
Stewart Island/Rakiura: Improvement on dog control reporting and enforcement specific to Rakiura	Feedback will be provided to Environmental Health team for consideration
Stewart Island/Rakiura: Registration of visiting dogs	Feedback will be provided to Environmental Health team for consideration

Issue provided in submission	Staff assessment
Stewart Island/Rakiura: Considering whether a dog has undertaken KAT when deciding if they are eligible for a responsible ownership discount on the dog registration.	Not in scope of bylaw and policy review Feedback will be provided to the Environmental Health team for consideration
Stewart Island/Rakiura: Consideration of funding wider KAT for visiting dogs and understanding the benefits of KAT for dogs in Southland in general	Not in scope of bylaw and policy review Feedback will be provided to the Environmental Health team for consideration
Stewart Island/Rakiura: Education resources for visitors to Rakiura on the risk of dogs to kiwi/strategies of prevention/dog friendly area/methods of reporting available and promoted through transport operators to the Island in high visibility locations	Feedback will be provided to Environmental Health team for consideration
Stewart Island/Rakiura: The map in the SDC Policy on dog access for Stewart Island around Oban is confusing and at a different scale to all the others. It implies dogs are allowed off-leash at the school and cemetery for example	This has been addressed through the updated maps included within the draft policy and bylaw.
Stewart Island/Rakiura: Funding from Stewart Island Visitor Levy to work on mitigating the potential impact of visiting dogs, perhaps more frequent KAT sessions, particularly over Summer when most visitors arrive, or having someone at the wharf talking to people arriving with dogs	Not in scope of bylaw and policy review Feedback will be provided to Environmental Health team for consideration
Stewart Island/Rakiura: Improvement in visibility of dog control reporting systems and enforcement on Rakiura and understanding that they also cover dogs visiting from out of the region	Not in scope of bylaw and policy review, but will be considered by Environmental Health team as part of service delivery

26 Staff note that the some of the specific issues are not adjustments to the proposals Council consulted on, rather they are new proposals which will require further public consultation with impacted and interested parties if they are to be implemented. This is mainly regarding the development of dog parks, which will require collaboration with Community Boards to develop proposals for these areas (including identifying appropriate and available land).

Amendments proposed by Community Boards

27 During the public consultation period, Community Boards presented suggestions on the draft policy and bylaw for amendment to areas within their remit. Some of these changes allow for designation of future land use for dog parks; others suggest a change in level of restriction currently in place. There are also suggestions to include further definitions within the policy.

Submission	Staff assessment
Oreti Community Board	
Include definitions of the words 'working dog' and 'guide dog'	The Act defines 'disability assist dog' as a guide dog is only one type of trained assistance dog. The Act defines working dog. A working dog also includes a disability assist dog. **It is recommended that the definition of 'Working Dog' as stated in the Act is included within the draft policy, for clarity.**
Include exemption for 'guide dogs' for all 'dogs are prohibited' areas	The policy already specifies working dogs may be taken into 'prohibited' public places (clause 4.2). The information above supports inclusion of a definition of working dog. **There is no change recommended at this stage.**
Reduce the 'dogs are prohibited' area to the playground only in Dipton	**This requires further investigation, planning and development by staff, and further public consultation. There is no change recommended at this stage.**
Remove the school as 'dogs are prohibited' area in Wallacetown as this land is not council owned/controlled	The Dog Control Act applies to Public Places not just Council owned/controlled land and this change would require further consultation with the school, community and dog owners. This could be addressed through a future amendment process, but **no change is recommended to the draft policy and bylaw at this stage.**
Remove the playground on Eglington Street in Winton as 'dogs are prohibited' area as this land is not council owned/controlled	The Dog Control Act applies to Public Places not just Council owned/controlled land and this change would require further consultation with the community and dog owners. This could be addressed through a future amendment process, but **no change is recommended to the draft policy and bylaw at this stage.**
Remove 'dogs are prohibited' area in Winton from Bute Street to George Street (leave Anzac Oval)	This requires further investigation, planning and development by staff, and further public consultation, **no change is recommended to the draft policy and bylaw at this stage.**
Wallace Takitimu Community Board	
Would like to see eastern flood bank walkway that runs from Main Street to Queen Street /Durham Street made into a dog exercise area so dogs can be exercised off-leash	This requires further investigation, planning and development by staff, and further public consultation, **no change is recommended to the draft policy and bylaw at this stage.**
101 Main Street and 6 Nantwich Street to be designated off-leash areas to allow for future dog park	This requires further investigation, planning and development by staff, and further public consultation, **no change is recommended to the draft policy and bylaw at this stage.**
Would not support Ohai rec reserve being a dog ex area	This has not been proposed in the draft policy or bylaw. **There is no change recommended.**

Submission	Staff assessment
Would like part of 50 Main Street to be off leash exercise area – neighbour landowner has indicated they are happy to allow dogs off-leash in their paddock	This requires further investigation, planning and development by staff, and further public consultation, **no change is recommended to the draft policy and bylaw at this stage.**
Northern Community Board	
Dogs prohibited area at memorial monument in Lumsden be changed to dogs on-leash	This requires further investigation, planning and development by staff, and further public consultation, **no change is recommended to the draft policy and bylaw at this stage.**
Stewart Island Rakiura Community Board	
All dogs based on island to undergo compulsory Kiwi Avoidance Training. Visiting dogs encouraged.	Staff will continue to work with the Community Board to understand if this could be achievable. **There is no change recommended at this stage.**
Concern about number of visitors – can work be done to assess how many, their effect, and possible restrictions	Not in scope of bylaw and policy review but will be considered by Environmental Health team as part of service delivery. **There is no change recommended.**

Further consultation on proposals received

28 Some suggestions provided by Community Boards and the public have been assessed as new proposals requiring further public consultation, rather than amendments to Council's proposals consulted on in the draft policy and bylaw. This is due to the change in access requested in certain areas which may impact members of the community (for example, a change to the dog control classification for Main Street, Winton) which impacted and interested persons have not been provided information on or had an opportunity to provide their views.

29 Further information is also required to define the scope, budget, and implementation of these proposals – particularly for dog parks.

30 Consultation required for the new proposals would need to be undertaken following the full Special Consultative Procedure in accordance with the requirements of the Dog Control Act 1996, with any existing informal engagement which may have already been undertaken by Community Boards will not have met this statutory requirement

31 It is recommended that Council progresses the draft policy and bylaw with the changes already consulted on, with a separate piece of work being established for staff to work with Community Boards to refine and plan for the new proposals received from Community Boards before consideration and consultation under a separate amendment to the bylaw and policy at a later date early in the new triennium.

32 Alternatively, Council could pause adoption of the draft policy and bylaw whilst the new proposals are developed and consulted prior to adoption of a revised draft policy and bylaw. This will also take place early in the new triennium, but may present issues with deliberation split between two different Council tables as we transition into the new triennium.

33 There is no option to include the Community Board proposals for deliberation and adoption now without further consultation, with both options susceptible to the risk of further delay.

34 Of the proposed changes, there is one exception, being the recommended inclusion of a definition of 'working dog' as per the Act which could be included without further consultation. Although this was not consulted on, it was suggested through public submissions. Staff assess this to be a minor amendment that does not require further consultation, as the definition to be included in the policy and bylaw replicates the definition in the Act and is provided for clarity rather than making any regulatory change.

Ara Pahu subdivision

35 Council heard an oral submission from a representative of Porpoise Bay Management Limited regarding the Ara Pahu subdivision sited at Porpoise Bay, Catlins.

36 Porpoise Bay Management Limited (the Company) manage a covenant over the subdivision that prohibits domestic cats and dogs. The submitter requested Council extend the 'dogs prohibited' classification to include the Ara Pahu subdivision.

37 Council do not have a role in the enforcement of the covenant. The prohibition of dogs is included within the covenant managed by the Company. The prohibition of dogs is not included within the final consent conditions for the subdevelopment.

38 Council could consider extending the 'dogs prohibited' classification to the road within the Ara Pahu subdivision. This would restrict a person/s entering the subdivision with a dog, unless they were in a vehicle, or they were working dogs. Council would then have a role in enforcement of dogs, which would be a compromise to prohibition over the entire subdivision, as requested.

39 This amendment was not consulted on within the current review and would also need to be consulted on. Staff have not proposed a change in dog control for this area for consideration as part of this review, but its timing could be aligned with the community proposals mentioned earlier.

Factors to consider

Legal and statutory requirements

40 The policy and bylaw have been developed as per the requirements mandated through the Dog Control Act 1996 (the Act).

41 The territorial authority must give effect to a policy adopted under s10(6) -

(a) by making the necessary bylaws under section 20, which must come into force not later than the 60th day after the adoption of the policy; and

(b) by repealing, before the 60th day after the adoption of the policy, any bylaws that are inconsistent with the policy.

42 The Act states at s10(8) that a territorial authority may, at any time, adopt, in accordance with the special consultative procedure, an amended policy under this section and this section shall apply, with the necessary modifications, to the adoption of that amended policy. This means that an amendment process will still require a level of public consultation, undertaken through the Special consultative procedure equivalent to changes under the current review.

43 As mentioned above, the new proposals would need to be consulted on following special consultative procedure. This is because no consultation has been undertaken for these proposals which meets the principles of consultation under section 82, or the requirements of Special Consultative Procedure under section 83, of the Local Government Act 2002.

Determinations

44 Before making a bylaw, Council must make the determinations required under section 155 of the Act. Set out below is the assessment by staff for each required determination.

Most appropriate way of addressing the perceived problem

45 Council must determine whether a bylaw is the most appropriate way of addressing the perceived problem or issue. Council have previously made the determination that a bylaw is the most appropriate way of addressing dog control within the District with the adoption of successive bylaws since the inaugural bylaw in 1997 (2004, 2009 and 2015).

46 Across New Zealand, bylaws remain a common method used by territorial authorities to effectively address dog control and encourage responsible dog ownership. Staff believe a dog control bylaw is the most appropriate option compared with having no bylaw.

47 To give effect to its Dog Control Policy, Council is required to have a bylaw in place. Without a bylaw, Council is provided limited alternatives to address the issues where it has identified further protections are necessary under the policy.

Most appropriate form of bylaw

48 Council is also required to determine whether the proposed bylaw is the most appropriate form of bylaw before it makes its decision. Staff believe the draft bylaw is the most appropriate form of bylaw as it is drafted to address additional issues identified from research and engagement and is reflective of the feedback provided by the community within the criteria set by the Act.

49 The determination in relation to this point will be made at the time of adoption

Bill of Rights

50 Council is required to determine whether the draft bylaw gives rise to any implications under the New Zealand Bill of Rights Act 1990 (the BoR Act), which grants certain civil and political rights to people in New Zealand. In accordance with section 5 of the BoR Act, 'the rights and freedoms contained in the Bill of Rights may be subject only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society'.

51 Staff believe the provisions of the draft bylaw do not unreasonably interfere with any of the rights in the BoR Act, balancing the needs of dogs and their owners with the need to minimise the potential for any danger, distress, harm or nuisance that may be caused by dogs to the public.

52 The determination in relation to this point will be made at the time of adoption.

Community views

53 Community views were obtained through a pre-engagement survey which received over 600 responses. These responses helped shape the proposed draft policy and bylaw.

54 The community views captured through the formal consultation process on the draft policy and bylaw were outlined in the issues section of the report that went to Council on 30 July 2025. The full booklet of the feedback received through the formal consultation process was also included as an attachment to that report.

55 Submitters generally supported the inclusion of the definitions for public place and effective control.

56 Public and Community Board feedback has resulted in recommendations (addressed in this report) which require further consultation by Council under this review.

57 Staff have assessed that the change proposed from public consultation for the inclusion of the definition of 'working dogs' does not require public consultation, given it is replicating the definition within the Act for clarity and will not change the application of either the policy or the bylaw.

Costs and funding

58 Costs associated with any required changes will be met through current operational budgets.

Policy implications

59 There are no policy implications identified, other than any delay in adopting the amendments consulted, if adoption is paused whilst new proposals are developed further.

60 Many of the changes proposed by Community Boards require further consultation using the special consultative procedure to be considered for adoption, regardless of whether this is undertaken within the current review or at a later date.

Analysis

Options considered

61 Two options have been identified:

- Option 1 – that Council deliberate matters consulted on, and direct staff to undertake further consultation on matters raised through feedback, and bring the draft Dog Control Policy and Bylaw back for further deliberation and adoption in the new triennium.
- Option 2 - that Council deliberate matters consulted on, to allow the draft dog control policy and dog control bylaw to progress to adoption. And that a subsequent amendment process will take place to further consider suggestions received through public consultation

Analysis of Options

Option 1 – that Council deliberate matters consulted on, and staff undertake further consultation on matters raised through feedback, and bring the draft Dog Control Policy and Bylaw back in the new triennium

Advantages	*Disadvantages*
• Community Board proposals will be explored fully and developed for consultation • the community will have an updated process for considering proposals received through public consultation • additional dog exercise areas may be implemented, which supports Council's obligations to provide for welfare of dogs and people, under the Act • the matters deliberated will not be reconsulted on	• the adoption and implementation of the draft bylaw and policy will be delayed • implementation of Community Board submissions is delayed • deliberation and adoption are split between Council tables and earlier posed and consulted changes may be relitigated by a future council

Option 2 – that Council deliberate matters consulted on, to allow the draft dog control policy and dog control bylaw to progress to adoption. And that a subsequent amendment process will take place to further consider suggestions received through public consultation

Advantages	*Disadvantages*
• the community have provided submissions on the proposed amendments • the amendments reflect the submissions received • the review process can still be completed within the current triennium if amendments are agreed, and the policy and bylaw are adopted at the 10 September meeting	• implementation of Community Board submissions is delayed • Community Boards may feel they have not been listened to • Council may not agree with the options for proposed amendments

62 If Council proceed with Option 1, the draft policy and bylaw will be reconsidered by staff and a consultation plan will be developed to seek feedback on options submitted through public consultation.

63 A new draft statement of proposal addressing the additional amendments will need to be provided to Council in the new triennium, together with a revised timeframe for public consultation, under

special consultative Procedure, and hearings, prior to deliberation and adoption with existing proposed amendments.

64 If Council chooses Option 2, Council will consider matters consulted on and proceed to adoption of the draft policy and bylaw on the basis that a subsequent amendment process will take place to consider suggestions received through public consultation at a later date. Again, the process to seek feedback on amendments will require a special consultative procedure.

Assessment of significance

65 As a change is being proposed to levels of dog control in public places, staff have assessed this decision meets the threshold of being a significant decision (in relation to Council's Significance and Engagement Policy and the LGA).

66 The most relevant factor (in this circumstance) for assessing significance in Council's Significance and Engagement Policy is "the effect on people who are likely to be particularly affected by or interested in the issue, decision or proposal."

67 Council has undertaken a thorough review of the current policy and bylaw. Council has considered the community views captured through preliminary consultation, and through the formal consultation process.

68 Council used the Special Consultative Procedure to seek community views in the formal consultation process, as required by the Dog Control Act 1996. In relation to the decision being made, Council has also comprehensively:

- identified the potential implications
- identified the reasonably practicable options
- assessed the options in terms of their advantages and disadvantages
- considered costs and funding
- provided and considered information
- provided a course of action for future amendments required to the bylaw.

Recommended option

69 Option 2 – that Council deliberate matters consulted on, to allow the draft dog control policy and dog control bylaw to progress to adoption. And that a subsequent amendment process will take place to further consider suggestions received through public consultation.

Next steps

70 If Council proceeds with Option 2, staff will complete the recommended amendments and provide an amended policy and bylaw to Council on 10 September for their final review and adoption. Further consultation on proposals received through consultation will be considered at a later date.

Attachments

A Key issues and options report - Draft Dog control policy and bylaw - deliberations 27 August 2025 ⇩
B Alternative map for Curio Bay (Option 2) ⇩
C Draft Dog Control Policy 2025 with recommended amendments - 21 August 2025 ⇩
D Draft Dog Control Bylaw 2025 with recommended amendments - 21 August 2025 ⇩

Key issues and options

Draft Dog Control policy and bylaw

Record Number: R/25/8/36814

Author: Ana Bremer, Senior policy analyst

Background

On 30 April 2025 Council approved the Draft Dog Control Policy 2025 and Dog Control Bylaw 2025 for public consultation.

The public consultation period ran from 12 May until 13 July 2025. 149 submissions were received during the public consultation period. One submission was received outside of the consultation period.

There were 114 submissions received through the Make it Stick portal. A further 36 submissions were either emailed or delivered to Council offices.

Staff have completed thematic analysis of the submissions and present this summary to Council.

Council heard submitters who elected to speak in relation to their submissions on 30 July 2025.

The following options are assessed based on all engagement and feedback on the draft policy and bylaw to date.

General themes received from submissions

The following themes were present in general comments from submissions:

- Dog parks in specific towns
- General non-compliance of dog owners
- General comments about enforcement and fees
- Improvement in dog control reporting systems and enforcement required.

Specific issues have been summarised in the following table, with staff assessment provided.

ISSUE PROVIDED IN SUBMISSION	STAFF ASSESSMENT
Ohai: Ohai rugby grounds could be used for designated dog exercise area	Staff are aware the rugby grounds may no longer be in use. This requires further consultation. It is recommended this be included for consultation during an amendment to the bylaw, alongside other targeted changes to community board areas, which is proposed to take place in 2026.
Nightcaps: Issues with signage on the racetrack	Feedback will be provided to Environmental Health team for consideration
Tuatapere: Concerns about dogs on the Tuatapere domain – there should be no dogs	Feedback will be provided to Environmental Health team for consideration

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ISSUE PROVIDED IN SUBMISSION	STAFF ASSESSMENT
Winton: Amend the bylaw to allow dogs off-leash *under control* on the Winton Walking Track	The current bylaw and policy allow for dogs on-leash on the Winton Walkway, which balances the needs of all users of this walkway. **There is no change recommended.**
Winton: Council should allocate adequate space and develop a dedicated dog exercise park where dogs can legally and safely run off-leash	**This requires further investigation, planning and development by staff, and further public consultation**
Stewart Island/Rakiura: Improvement on dog control reporting and enforcement specific to Rakiura	Feedback will be provided to Environmental Health team for consideration
Stewart Island/Rakiura: Registration of visiting dogs	Feedback will be provided to Environmental Health team for consideration
Stewart Island/Rakiura: Considering whether a dog has undertaken KAT when deciding if they are eligible for a responsible ownership discount on the dog registration.	Not in scope of bylaw and policy review, but will be considered by Environmental Health team as part of fees and charges
Stewart Island/Rakiura: Consideration of funding wider KAT for visiting dogs and understanding the benefits of KAT for dogs in Southland in general	Not in scope of bylaw and policy review, but will be provided to Environmental Health team for consideration
Stewart Island/Rakiura: Education resources for visitors to Rakiura on the risk of dogs to kiwi/strategies of prevention/dog friendly area/methods of reporting available and promoted through transport operators to the Island in high visibility locations	Feedback will be provided to Environmental Health team for consideration
Stewart Island/Rakiura: The map in the SDC Policy on dog access for Stewart Island around Oban is confusing and at a different scale to all the others. It implies dogs are allowed off-leash at the school and cemetery for example	This has been addressed through the updated maps included within the draft policy and bylaw.
Stewart Island/Rakiura: Funding from SIVL to work on mitigating the potential impact of visiting dogs, perhaps more frequent KAT sessions, particularly over Summer when most visitors arrive, or having someone at the wharf talking to people arriving with dogs	Not in scope of bylaw and policy review Feedback will be provided to Environmental Health team for consideration
Stewart Island/Rakiura: Improvement in visibility of dog control reporting systems and enforcement on Rakiura and understanding that they also cover dogs visiting from out of the region	Not in scope of bylaw and policy review, but will be considered by Environmental Health team as part of service delivery

Community Board proposed amendments

Background

During the public consultation period, Community Boards presented suggestions on the draft policy and bylaw for amendment to areas within their remit. Some of these changes allow for designation of future

land use for dog parks; others suggest a change in level of restriction currently in place. There are also suggestions to include further definitions within the policy.

Summary of feedback

SUBMISSION	STAFF ASSESSMENT
ORETI COMMUNITY BOARD	
Include definitions of the words 'working dog' and 'guide dog'	The Act defines 'disability assist dog' as a guide dog is only one type of trained assistance dog. The Act defines working dog. A working dog also includes a disability assist dog. **It is recommended that the definition of 'Working Dog' as stated in the Act is included within the draft policy, for clarity.**
Include exemption for 'guide dogs' for all 'dogs are prohibited' areas	The policy already specifies working dogs may be taken into 'prohibited' public places (clause 4.2). The information above supports inclusion of a definition of working dog. **There is no change recommended.**
Reduce the 'dogs are prohibited' area to the playground only in Dipton	As this change would require further consultation, no change is recommended under this review but instead staff recommend this feedback is considered as part of a wider review of dog exercise areas proposed for 2026. **There is no change recommended at this stage.**
Remove the school as 'dogs are prohibited' area in Wallacetown as this land is not council owned/controlled	The Dog Control Act applies to Public Places not just Council owned/controlled land and this change would require further consultation with the school and community. This could be addressed through an amendment process, but **no change is recommended to the draft policy and bylaw at this stage.**
Remove the playground on Eglington Street in Winton as 'dogs are prohibited' area as this land is not council owned/controlled	The Dog Control Act applies to Public Places not just Council owned/controlled land and this change would require further consultation with the school and community. This could be addressed through an amendment process, but **no change is recommended to the draft policy and bylaw at this stage.**
Remove 'dogs are prohibited' area in Winton from Bute Street to George Street (leave Anzac Oval)	As this change would require further consultation, no change is recommended under this review but instead staff recommend this feedback is considered as part of a wider review of dog exercise areas proposed for 2026, **no change is recommended to the draft policy and bylaw at this stage.**
WALLACE TAKITIMU COMMUNITY BOARD	
Would like to see eastern flood bank walkway that runs from Main Street to Queen Street /Durham Street made into a dog exercise area so dogs can be exercised off-leash	As this change would require further consultation, no change is recommended under this review but instead staff recommend this feedback is considered as part of a wider review of dog exercise areas proposed for 2026, **no change is recommended to the draft policy and bylaw at this stage.**
101 Main Street and 6 Nantwich Street to be designated off-leash areas to allow for future dog park	As this change would require further consultation, no change is recommended under this review but instead staff recommend this feedback is considered as part of a wider review of dog exercise areas proposed for 2026, **no change is recommended to the draft policy and bylaw at this stage.**

Would not support Ohai rec reserve being a dog ex area	This has not been proposed in the draft policy or bylaw. **There is no change recommended.**
Would like part of 50 Main Street to be off leash exercise area – neighbour landowner has indicated they are happy to allow dogs off-leash in their paddock	As this change would require further consultation, no change is recommended under this review but instead staff recommend this feedback is considered as part of a wider review of dog exercise areas proposed for 2026, **no change is recommended to the draft policy and bylaw at this stage.**
NORTHERN COMMUNITY BOARD	
Dogs prohibited area at memorial monument in Lumsden be changed to dogs on-leash	This requires further consultation. **It is recommended this be included in an amendment to the bylaw, alongside other targeted changes to community board areas, which will take place in 2026, no change is recommended to the draft policy and bylaw at this stage.**
STEWART ISLAND RAKIURA COMMUNITY BOARD	
All dogs based on island to undergo compulsory kat. Visiting dogs encouraged.	Staff will continue to work with the Community Board to understand if this could be achievable. **There is no change recommended at this stage.**
Concern about number of visitors – can work be done to assess how many, their effect, and possible restrictions	Not in scope of bylaw and policy review but will be considered by Environmental Health team as part of service delivery. **There is no change recommended.**

Discussion

Staff have assessed that many of the amendments suggested by Community Boards relating to dog exercise areas are new proposals and cannot be included within the draft policy and bylaw without additional consultation with the community, given they are proposing further changes to the level of dog control, which people who are impacted, or who may have interest in the decision, are not currently aware of and have not had an opportunity to present their views on.

New dog exercise areas will require additional work to develop the specific amendments to the bylaw and policy but also to implement these changes. The Dog Control Act requires amendments to dog control policies and bylaws to meet the standards of special consultative procedure. This applies to these regardless of whether these are included within the current review or undertaken as separate amendments. If considered alongside currently proposed amendments, these requirements will delay completion of the current review of the bylaw and policy.

Options

Staff have identified two options on how Council could proceed on this issue:

- **Option 1. that Council reconsult on Community Board amendments before progressing the adoption of the bylaw and policy**
- **Option 2. that Council progress with the review of the draft bylaw and policy and consult on amendments at a later date.**

Option 1 – that Council reconsult on Community Board amendments before progressing the adoption of the bylaw and policy	
Advantages	*Disadvantages*

Option 1 – that Council reconsult on Community Board amendments before progressing the adoption of the bylaw and policy	
• Community Board suggestions may be progressed earlier	• Delay in adoption of current bylaw and policy • Impact on staff across multiple areas of council • Consultation would take place over election period • Bylaw and policy review would continue into next triennium • deliberation and adoption are split between Council tables and earlier posed and consulted changes may be relitigated by a future council

Option 2 - that Council progress with the review of the draft bylaw and policy and consult on amendments at a later date	
Advantages	*Disadvantages*
• Provides more time for Community boards to work alongside council staff to develop plans and potentially address any other issues with dog control in the area • Allows Community Boards time to progress options through LTP, around funding for dog exercise parks • Ensures a fair process around consultation with the wider community, where they haven't had an opportunity to provide their views on suggested amendments. • the review process can still be completed within the current triennium	• Community Board suggestions will not be implemented immediately

Recommended Option:

Option 2. that Council progress with the review of the draft bylaw and policy and consult on amendments at a later date.

Curio Bay/Porpoise Bay amendments

1. Proposal for "dogs on-leash" on Waikawa Curio Bay Road from the Cook Creek Access south

Summary of feedback

The draft policy and bylaw consulted on by Council proposed that the Waikawa Curio Bay Road from the Cook Creek access south be classified as an on-leash area. Of the 149 submissions received, 40 agreed (27%), 15 disagreed (10%), 59 had no opinion (39%) and 35 did not answer (24%).

Submitters who supported this option provided fewer comments, but those who did raised the threat that dogs pose to penguins and wildlife, and not having to leave dogs in cars.

Comments from submitters who did not support this option included concerns about public safety and lack of infrastructure – there is no footpath to walk on, the area is prone to heavy traffic (especially during holiday periods), the road is narrow with little space to safely walk – not a safe alternative to walking on the beach.

Further comments from submitters who did not support this option felt that the current restrictions were enough – some submitters would prefer the entire area to be "Dogs Prohibited" rather than allow dogs on-leash at any place. This is mainly due to concerns for wildlife and ongoing efforts to support wildlife.

Discussion

Limiting dogs to on-leash also ensures safety of dogs and people travelling in vehicles, as owners will be able to keep dogs under greater effective control should they be on the roadside. Staff believe applying the on-leash classification remains in keeping with consideration of dog control in the wider area and does not need to be further amended from what was proposed in the draft policy and bylaw consulted on.

The change on this road is not to just propose an alternative dog walking space to the beach; rather it balances control and safety of dogs in this area for both wildlife and public (from the 'no restriction' which currently applies here). It allows people to more safely have their dog in this area than at present and is not intended to address broader safety improvements for pedestrians in this area.

Options

Two options have been identified:

- **Option 1. that Waikawa Curio Bay Road from the Cook Creek Access south is classified as "dogs on-leash" as originally proposed**
- **Option 2. status quo (no dog restriction applies on this road)**

Option 1 – that Waikawa Curio Bay Road from the Cook Creek Access south is classified as "dogs on-leash"	
Advantages	*Disadvantages*
• Supports and is in keeping with the increased dog control across the area • Ensures dogs are on-leash when on the road which reduces safety risk for dogs and other road users	• There may be increased numbers of dogs being walked on the road which could present safety issues

Option 2 – status quo (no change)	
Advantages	*Disadvantages*

Option 2 – status quo (no change)	
• rules are consistent with current bylaw and policy approach	• is not in keeping with the general theme of submissions requesting increased dog control in the area • less control of dogs creates safety risks for dogs and other road users in the road environment in this location •

Recommended Option:

Option 1. that Waikawa Curio Bay Road from the Cook Creek Access south is classified as "dogs on-leash"

2. Proposal for "dogs prohibited" on Council land between the campground and the Ara Pahu subdivision

Summary of feedback

The draft policy and bylaw consulted on by Council proposed that the land between the campground and the Ara Pahu subdivision be classified as a 'dogs prohibited' area. Of the 149 submissions received on this proposal:

- 19 agreed (13%)
- 12 disagreed (8%)
- 78 had no opinion (52%)
- 40 did not answer (27%)

Discussion

Advisors from Te Ao Marama Inc. have confirmed they are in support of this area being designated 'dogs prohibited'.

The feedback from consultation does not provide a clear weighting in preference, given the number of submissions that opted for 'no opinion' or 'no answer'. However, on balance of the comments regarding the general preference towards increasing the level of dog control in the area, it could be beneficial to apply the dogs prohibited classification. This would be in keeping with the wider area and reflects the dog control classification currently applied on the beach.

Submission results are largely inconclusive due to the high proportion of submitters not expressing a preference. Given this is Council land, the impact on members of the public is likely to be low.

While there are two options identified, based on advice from Te Ao Marama Inc. and on balance of the feedback suggesting an increase to dog control across the wider area, Council should consider classifying this area as "dogs prohibited".

Options

Two options have been identified:

- **Option 1. that the Council land between the campground and the Ara Pahu subdivision is classified as "dogs prohibited" as originally proposed**
- **Option 2. status quo (no dog restriction applies in this area)**

Recommended Option:

Option 1. that the Council land between the campground and the Ara Pahu subdivision is classified as "dogs prohibited"

3. Proposal for "dogs prohibited" on Council land north of Mair Road

Summary of feedback

The draft policy and bylaw consulted on by Council proposed that the land north of Mair Road be classified as a 'dogs prohibited' area. Of the 149 submissions received, 18 agreed (12%), 10 disagreed (7%), 83 had no opinion (56%) and 38 did not answer (25%).

Discussion

Comments from submitters who supported this option included that people disregard the current rules in place, there are concerns about wildlife being harmed by dogs, and it would be easier for Council to 'police' no dogs across the entire area.

Submission results are largely inconclusive due to the high proportion of submitters not expressing a preference. Given this is Council land, the impact on members of the public is likely to be low.

While there are two options identified, on balance of the feedback suggesting an increase to dog control across the wider area, Council should consider classifying this area as "dogs prohibited".

Options

Two options have been identified:

- **Option 1. that the Council land north of Mair Road is classified as "dogs prohibited" as originally proposed**
- **Option 2. status quo (no dog restriction applies in this area)**

Recommended Option:

Option 1. that the Council land north of Mair Road is classified as "dogs prohibited"

4. Proposal for dogs to be prohibited on the beach from Cook Creek southward and out to the mean low water springs (shoreline)

Summary of feedback

The draft policy and bylaw consulted on by Council proposed that dogs be prohibited on the beach from Cook Creek southward and out to the mean low water springs (shoreline). Of the 149 submissions received, 18 agreed (12%), 18 disagreed (12%), 73 had no opinion (49%) and 40 did not answer (27%).

Comments from submitters who supported this option included regularly seeing dogs off-leash in this zone, and concerns that a person or wildlife may get hurt. There was support for increased clarity in terms of the area that is prohibited (having a more obvious geographic reference being the Creek).

Comments from submitters who did not support this option felt that current rules are sufficient. There are concerns that dogs are being forced off the beach and onto the road, without public infrastructure. Some suggested there isn't wildlife on the beach at Porpoise Bay during the day.

Discussion

Submissions did not provide a conclusive preference. This was due to the high number of the 'no opinion' option being selected or no answers being provided. Feedback from pre-engagement does not provide any conclusive feedback on this proposed change.

On balance of the comments regarding dog control in the area, there would be a tendency toward increasing the restrictions. There are definite wildlife concerns, and while it has been suggested there is no wildlife present during the day, there has not been an environmental assessment provided to support this.

Regulatory and enforcement staff have recommended the dogs prohibited status is increased as it makes the area more easily enforceable. A clear line marking the difference in status would be valuable and would support them in their enforcement role. While it is noted that being a water body, the feature of the creek may shift from time to time, but it is not assessed as being such a significant movement that it would necessarily impact the application of the prohibited status.

The north end of the beach (to the north of Cook Creek)

Options

Two options have been identified:

- **Option 1. dogs to be prohibited on the beach from Cook Creek southward and out to the mean low water springs (shoreline)**
- **Option 2. status quo, but extending the current dog prohibition out to the mean low water springs (shoreline)**

Option 1 – dogs to be prohibited on the beach from Cook Creek southward and out to the mean low water springs (shoreline)	
Advantages	*Disadvantages*
• Provides a distinct geographic boundary to identify the area where dogs are prohibited • Still allows for the entire north end of the beach to be walked off-leash • Supports comments from submitters about increased dog control in the area overall • Supports regulatory and enforcement staff to more easily apply the rules	• Some members of the public maybe distressed to lose 'dogs on-leash' status, particularly those with beachfront properties who own dogs • There may be increased numbers of dogs being walked on the road which could present safety issues

Option 2– Status quo, but extending the current dog prohibition out to the mean low water springs (shoreline)	
Advantages	*Disadvantages*
• rules are consistent with current bylaw and policy approach	• may result in distress to some community members who want an increased dog control status

Option 2– Status quo, but extending the current dog prohibition out to the mean low water springs (shoreline)	
• map issue is addressed (restrictions out to shoreline) to reflect the intent of the policy and bylaw • reflects comments from submissions in favour of retaining status quo	• may still present confusion when applying 'dogs on-leash' and 'dogs prohibited' when on the beach and not looking at a map • presents problems for regulatory and enforcement staff if the arbitrary line is debated

Recommended Option:

Option 1. dogs to be prohibited on the beach from Cook Creek southward and out to the mean low water springs (shoreline)

Proposal to reduce the Wyndham dog exercise area

Summary of feedback

The draft policy and bylaw consulted on by Council proposed that the Wyndham dog exercise area was reduced to accommodate an alternative use of stock grazing. Public consultation feedback regarding the Wyndham dog exercise park was inconclusive. Of the 149 submissions received:

- 7 agreed (5%)
- 23 disagreed (15%)
- 75 had no opinion (50%)
- 44 did not answer (30%).

Comments from submitters who did not support this option included:

- more than enough grazing paddock without taking over dog exercise space
- reducing the area that has already been allocated seems unfair
- there aren't enough dog exercise areas as it is.

Discussion

It is noted that the dog exercise activity existed before grazing was permitted to take place, and that the two activities are not compatible. There are no other dog exercise areas designated in Wyndham.

Under Section 10(4) of the Act:

In adopting a policy under this section, the territorial authority must have regard to—

a) the need to minimise danger, distress, and nuisance to the community generally; and
b) the need to avoid the inherent danger in allowing dogs to have uncontrolled access to public places that are frequented by children, whether or not the children are accompanied by adults; and
c) the importance of enabling, to the extent that is practicable, the public (including families) to use streets and public amenities without fear of attack or intimidation by dogs; and
d) the exercise and recreational needs of dogs and their owners.

As noted in the submissions, the dog exercise area was an existing activity in the designated area. Grazing has been allowed to take place at different times during the year which is adjacent to and sometimes

overlapping the mapped dog exercise area. The Community Board had suggested the area may be better suited to grazing.

Although public feedback was low in response to this question, there were more responses in favour of keeping the dog exercise area in place without change. This would require an alternative to the grazing situation. The two activities are at odds with each other and may pose risk to stock, dogs, or people.

There were no other areas identified as being suitable for a dog exercise area. This could be further investigated through an amendment to the bylaw at a later date. It would be preferable to have identified a new area for dog exercise before the current area was decreased, to ensure dog owners had enough space to exercise their dogs off-leash, in an area size similar to (or of equal amenity to) the current area in Wyndham.

Options

Two options have been identified:

- **Option 1. reduce the Wyndham dog exercise area**
- **Option 2. no change to the Wyndham dog exercise area and that the activity continues in the designated area**

Option 1 – reduce the Wyndham dog exercise area	
Advantages	*Disadvantages*
• grazing activity can remain in place • reflects the view of the Community Board	• less area for dogs to exercise • no alternative site proposed or identified for dog exercise area meaning amenity is decreased • may be at odds with the intent of the policy and bylaw to provide for dogs and their owners • may not reflect community views

Option 2– no change to the Wyndham dog exercise area	
Advantages	*Disadvantages*
• status quo - rules are consistent with current bylaw and policy approach • ensures two activities that are inconsistent with each other no longer take place • More reflective of community views	• at odds with Community Board suggestion • the grazing activity will need to cease – this may impact stock owners

Recommended Option:

Option 2. that there are no changes to the Wyndham dog exercise area.

Proposals recommended to proceed without amendment

Two of the proposed amendments to the policy and bylaw have received positive feedback from consultation in support of the amendments. It is recommended that these amendments are implemented within the policy and bylaw.

1. Proposal to include definitions of 'Effective Control' and 'Public Place'

Summary of feedback

The draft policy and bylaw consulted on by Council proposed that new definitions of of 'Effective Control' and 'Public Place' were included to improve clarity. Of the 149 submissions received, 74 agreed (50%), 9 disagreed (7%), and the remaining submissions had no opinion. There were no suggested amendments to improve the proposed definitions.

Comments from submitters who supported this option included

- good practice to have clear definitions or words used in policy – removes ambiguity
- assists dog owners to understand terms
- supports enforcement and compliance efforts.

There is a clear advantage for providing definitions within the policy and bylaw, which is to support understanding of responsible dog ownership and control in public places.

Feedback has not identified any amendments to this proposal for consideration by Council.

2. Proposal Te Anau town centre area is changed to 'dogs on-leash'

Summary of feedback

The draft policy and bylaw consulted on by Council proposed that the Te Anau town centre revert from 'Dogs Prohibited' to 'Dogs on-leash'. Of the 149 submissions received, 92 agreed (62%), 26 disagreed (17%), and the remaining submissions had no opinion.

Comments from submitters who supported this option included:

- general support as long as dogs remain under effective control – more opportunities for responsible dog ownership education should be provided
- animal welfare – not having to leave dogs in vehicles if in town centre; may also reduce risk of dogs disturbing other animals as they are on-leash
- positive for community and tourism – flexibility for locals and tourists to visit town centre if they are travelling with dogs, enhances Te Anau's dog friendly image
- consistency of rules across the wider area – comparison with other 'tourist' towns and rules around dog in central public spaces means less confusion for tourists
- encourages responsible pet ownership – increases accessibility for people who like to walk their dogs through town, encourages socialisation for dogs, rule allows for Council to enforce conduct

Comments from submitters who did not support this option included:

- restricted public access – concerns for those who fear or do not like dogs being unable to move freely without fear, or having to avoid town centre
- public safety – concerns for elderly or tamariki being tripped/knocked over by dogs; concerns about potential attacks to humans or other animals/wildlife
- public health - concerns about mess left behind by dogs (faeces)
- regulatory and enforcement – 'no dogs' is easier to enforce
- dog behaviours – potential for wandering, barking, rushing, fighting
- owner behaviours – not picking up after dogs, leaving them tied up outside shops.

Discussion

Te Anau town centre has been a reoccurring theme when considering dog control in the District. The 'dogs prohibited' status is openly flouted despite signage and is not supported by most submitters. The Community Board provided a submission in support of changing the dog control classification to 'dogs on-leash', and regulatory and enforcement staff agree with the amendment.

While this may be disappointing for some community members, on balance it appears that changing the classification would be preferable. The definition of effective control will support dog owners in their responsibilities of controlling their dogs in public places, and this will also enable regulatory staff to enforce more easily if they see a dog/owner in breach of the rules. This should go some way to ensuring there are few issues with dogs on-leash in the Te Anau Town Centre.

Options

Two options have been identified:

- **Option 1. Te Anau town centre is changed from 'dogs prohibited' to 'dogs on-leash'**
- **Option 2. no change to the Te Anau Town Centre dog control rules**

Option 1 – Te Anau town centre is changed from 'dogs prohibited' to 'dogs on-leash'	
Advantages	*Disadvantages*
• reflects the majority of submissions • implements a change that has been presented to Council on multiple occasions in the past • allows regulatory staff to enforce dogs on-leash effectively (when dogs may not be on-leash)	• may result in distress to some community members who do not want to see a change to the dog control status

Option 2– no change to the Te Anau Town Centre dog control rules	
Advantages	*Disadvantages*
• status quo may be less confusing	• does not reflect the majority of public submissions • is likely to be brought up in future dog control bylaw and policy amendments or reviews • community may feel Council has not listened to their views

Recommended Option

It is recommended that Council proceed with Option 1: Te Anau town centre is changed to 'dogs on-leash'.

Dog Control Bylaw 2025 - Curio Bay

SOUTHLAND DISTRICT COUNCIL

N

Legend
- Dog prohibited areas
- Dog on lead areas
- Property boundaries

0 50 100 150 200 250
Metres

Scale: 1:6,000 at A4
Date prepared: 12/08/2025

G:\GIS\Map Requests\Dog control maps\SR-59159 Bylaw Review Curio Bay Wyndham proposals

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DRAFT Dog Control Policy 2025

Group Responsible: Environmental Health

Date Adopted: 10 September 2025

File #: R/24/10/63655

Purpose

The purpose of this policy is to strike the proper balance between the need to control dogs and the recognition of the overall benefits of responsible dog ownership.

Background

The Council recognises that the keeping of dogs is a positive part of life for many Southlanders. Dogs under responsible ownership can have a positive role in society and provide assistance, enjoyment and health benefits to many individuals and families.

The Council is also recognises the need to minimise the adverse impacts dogs can have on communities. The Dog Control Act 1996 (the Act) requires that the Council have a dog control policy in its district. In adopting the policy the Council must have regard to:

- The need to minimise danger, distress, and nuisance to the community generally
- The need to avoid the inherent danger in allowing dogs to have uncontrolled access to public places that are frequented by children, whether or not the children are accompanied by adults
- The importance of enabling, to the extent that is practicable, the public (including families) to use streets and public amenities without fear of attack or intimidation by dogs
- The exercise and recreational needs of dogs and their owners.

Any word used in this policy document that is defined in the Act has the meaning given to it by that Act.

Dog Control Bylaws

The Council must have bylaws to give effect to its Dog Control Policy. It is intended that the Dog Control Bylaw 2025 be enacted to reflect the contents of this policy document.

The Act specifies matters for which bylaws may be made. The bylaws apply to all dog owners in the District and will be enforced using the full range of enforcement mechanisms available to the Council.

The following issues have been identified which will be dealt with by the bylaws:

- Minimum standards of accommodation for dogs
- Prohibiting dogs from specified public places
- Regulating and controlling dogs in other public places
- Requiring the removal of dog faeces from public places

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- Prohibiting female dogs in season and diseased dogs from public places unless confined or permission granted
- Regulating the number of dogs that may be kept on any premises
- Requiring the neutering of uncontrolled and menacing dogs.

Policy details

Council's objective is to encourage responsible dog ownership that allows dog owners to enjoy their dogs without impinging on the enjoyment and safety of others.

Responsible dog owners will:

- Register and microchip their dogs
- Ensure that the dogs always wear a current registration tag
- Provide their dogs with sufficient food, water, shelter, and exercise
- Make sure that their dogs do not become a nuisance or danger to people or animals
- Comply with the Dog Control Act 1996 and the Council's Dog Control Bylaws.

Registration and Other Fees

The Council has adopted a registration fee structure which recognises non-working dogs and working dogs.

As recognition of responsible dog ownership and to encourage neutering and fenced containment, the Council will set fees for non-working dogs that may consider the following factors:

- Whether there is fencing or a fenced enclosure sufficient to contain the dog on the premises.
- Whether the dog is neutered or spayed.
- Whether the dog has been microchipped.
- Whether there has been a written warning, barking abatement notice, seizure or infringement under the Dog Control Act 1996 within the previous two years relating to any dog owned by the person applying for the registration.
- A fee for late registration.

The Dog Control Act 1996 requires that all money received from dog registration fees or other charges levied are to be applied for dog control purposes. The intention of Council is that dog control in the District is on a user pay basis of fees and charges will be set at a level to give effect to that intention.

Number of Dogs

No person may keep more than two dogs over three months of age on any premises for any period exceeding 14 days other than working dogs not being kept on premises in a predominantly urban or residential environment. This requirement does not apply to:

- Dogs up to three months old.

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- Any dogs kept on premises over 50 hectares.
- Dogs kept temporarily on veterinary clinic premises.
- A pound established under Section 67 of the Dog Control Act 1996.

The Council will issue multiple dog licences only when it is satisfied that:

- The premises concerned is suitable in all respects for the keeping of the number of dogs applied for.
- The arrangements relating to the feeding shelter and exercise of the dogs are adequate.
- The keeping of the number of dogs applied for will not be a nuisance or pose an undue risk to neighbours.

A licence issued may impose any conditions that Council officers consider are reasonably necessary taking into account the matters referred to in paragraph 8.2.

A multiple dog licence will not be transferable.

A fee will be charged for the issue and administration of a multiple dog licence.

Dogs in Public Places

This policy identifies public places in the Southland District where dogs are prohibited or must be controlled on a leash. It also designates dog exercise areas where dogs may be exercised off the leash, provided they are under effective control.

Effective control means

- you are aware of where the dog is and what it is doing
- you are close enough to prevent issues including nuisance or danger to other people, animals, wildlife, and property
- you can bring the dog quickly to heel through verbal command, whistle, physical signal or gesture, or restraint.

Public place means

a) a place that, at any material time, is open to or is being used by the public, whether free or on payment of a charge, and whether any owner or occupier of the place is lawfully entitled to exclude or eject any person from that place; and
b) includes any aircraft, hovercraft, ship or ferry or other vessel, train, or vehicle carrying or available to carry passengers for reward.

Working Dog means

a) any disability assist dog
b) any dog kept by the Police or any constable, the New Zealand Customs Service, the Ministry of Agriculture and Forestry, the Ministry of Fisheries, or the Ministry of Defence, or any officer or employee of any such department of State solely or principally for the purposes of carrying out the functions, powers, and duties of the Police or the department of State or that constable, officer, or employee; or

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c) kept solely or principally for the purposes of herding or driving stock
d) kept by the Department of Conservation or any officer or employee of that department solely or principally for the purposes of carrying out the functions, duties, and powers of that department
e) kept solely or principally for the purposes of destroying pests or pest agents under any pest management plan under the Biosecurity Act 1993
f) kept by the Department of Corrections or any officer or employee of that department solely or principally for the purposes of carrying out the functions, duties, and powers of that department
g) kept by AvSec or any officer or employee of that service solely or principally for the purposes of carrying out the functions, duties, and powers of that service
h) certified for use by the Director of Civil Defence Emergency Management for the purposes of carrying out the functions, duties, and powers conferred by the Civil Defence Emergency Management Act 2002
i) owned by a property guard as defined in section 9 of the Private Security Personnel and Private Investigators Act 2010 or a property guard employee as defined in section 17 of that Act, and kept solely or principally for the purpose of doing the things specified in section 9(1)(a) to (c) of that Act
j) declared by resolution of the territorial authority to be a working dog for the purposes of the Act, or any dog of a class so declared by the authority, being a dog owned by any class of persons specified in the resolution and kept solely or principally for the purposes specified in the resolution.

No person may take a dog (not including a dog confined in a vehicle or cage) into any public place specified in Schedule 1 or 2 as prohibited except:

- any working dog while it is under the control of its owner or handler; or
- a public place not under the control of the Council where the person in charge of that place has given permission for the dog to be there and the presence of the dog is in accordance with the conditions (if any) of that permission.

No person shall take any female dog in season or a diseased dog into any public place unless:

- that dog is completely confined in a vehicle or cage for the purposes of transportation; or
- that dog is in a public place not under the control of the Council where the person in charge of that place has given permission for the dog to be there and the presence of the dog is in accordance with the conditions (if any) of that permission.

No person shall take a dog into any public place specified in Schedule 1 or 2 as an on-leash only area unless the dog is controlled on a leash except:

- any dog confined in a vehicle or cage; or
- any working dog while it is under the control of its owner or handler.

The owner of any dog (including a dog classified as a menacing or dangerous dog that is muzzled) may take that dog in any public place specified in Schedules 1 or 2 as a designated dog exercise area provided that dog is kept under effective control.

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Except as provided for in Schedules 1 and 2, dogs must be under effective control at all times and may be off a leash.

The Council may from time to time by public notice prohibit or impose additional conditions on the taking of dogs to any of the areas in Schedules 1 and 2 and walking tracks, picnic areas and roads under the control of the Council and those conditions shall apply accordingly as if they are conditions specified in the Schedules.

The Council may from time to time by public notice make temporary changes to Schedules 1 and 2 in relation to leisure and culture events (including dog friendly events), dog training, threatened or 'at risk' protected wildlife vulnerable to dogs, and pest control. Those changes shall apply as if they are conditions specified in the Schedules.

In this clause, public notice means one or more clearly legible notices affixed in one or more conspicuous places on, or adjacent to, the area to which the notice relates.

National Parks

The Fiordland and Rakiura National Parks are within the Southland District. The Parks comprise large areas of Fiordland and Stewart Island respectively. The boundaries of both parks can be ascertained by referring to the maps on the website of the Department of Conservation at www.doc.govt.nz.

Dogs are not allowed to be in national parks and the National Parks Act 1980 makes it an offence for any owner or person in charge of a dog to have it in a national park except in the circumstances and subject to the conditions specified in that Act.

There are some exceptions to the general rule prohibiting dogs from being in a National Park. For example, in the context of Fiordland National Park, there are small areas at Supply Bay, Frasers Beach, Upper Waiau River, Ewe Burn and Te Anau Downs where access by dogs may be available by a permit issued by the Department of Conservation. All inquiries about the extent of permitted dog access in both National Parks should be made to the Department of Conservation offices at Invercargill, Te Anau or Oban.

Conservation land

In addition to the two National Parks there are areas of conservation land in the Southland District administered by the Department of Conservation where access by dogs is controlled (by permit issued by the Department) or open (under control everywhere and on a leash in any camping areas and at hut sites).

The Department of Conservation has published a map on its website www.doc.govt.nz showing the boundaries of the open and controlled access areas.

It is important that a person considering taking a dog on to any conservation land first make inquiries of the Department of Conservation about the permit and control requirements.

Barking Dogs

Section 55 of the Dog Control Act 1996 authorises Council's Dog Control Officers to issue an abatement notice to any person who owns a dog which the Officer considers is causing a nuisance by persistent and loud barking or howling. Non-compliance with this notice will result in enforcement action.

Section 56 authorises the Officer to remove the dog from the premises if the owner takes no action, or the nuisance is continuing and causing distress to any person.

The Council will implement these provisions on substantiated complaint.

Menacing and Dangerous Dogs

The Dog Control Act 1996 contains provisions which enable the Council to require specific control action be taken in respect of menacing or dangerous dogs.

A menacing dog is one that has not been classified as dangerous but which the Council considers may pose a threat to people, stock, poultry, domestic animal, or protected wildlife because of any observed or reported behaviour of the dog, or any characteristics typically associated with the dog's breed or type or belongs wholly or predominantly to one or more breeds or types listed in Schedule 4 of the Dog Control Act 1996.

A dangerous dog is one which the Council has on sworn evidence attesting to the aggressive behaviour by the dog, reasonable grounds to believe that it constitutes a threat to the safety of any person, stock, poultry, domestic animal, or protected wildlife or where the owner has admitted in writing that the dog constitutes such a threat or has been convicted of an offence relating to the dog attacking a person or animal.

The Council will:

- Enforce the provisions of the Dog Control Act 1996 relating to dangerous and menacing dogs
- Require all dogs classified as menacing by the Council or any other Council to be neutered and the owner provide a veterinary certificate showing the dog has been neutered within one month of classification.

Enforcement

The Council will use the full range of enforcement options available to it under the Dog Control Act 1996 and other legislation to ensure that dog ownership in the District is undertaken in accordance with this policy.

The Dog Control Act 1996 provides that the Council may issue infringement notices or prosecute for, offences against the act or the Council's bylaws.

The Council's aim is to promote responsible dog ownership and therefore an educational advisory approach will be taken where appropriate. However, enforcement action may be taken without warning where:

- An owner fails to register a dog
- The actions or inaction of the owner amount to a disregard to the safety or convenience of any person or the safety of any animal
- The dog has attacked a person or animal
- There has been a deliberate attempt to circumvent the Dog Control Act 1996 or the Council bylaws.

Dogs found at large in a public place in contravention of the Council's bylaws may be seized and impounded by a Dog Control Officer, Dog Ranger, or any other person authorised by the Council.

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Schedule 1

General Dog Access Rules

This Schedule contains general dog access rules that apply across the Southland District.

Playgrounds and sports grounds under the control of the Council

Dogs are prohibited on any playground or sports ground at all times.

Urban zones, Council-controlled carparks and boating areas, designated freedom camping areas

Dogs must be undereffective control and on a leash within or on all –

(a) Urban zones as identified in the Southland District Plan

(b) Council-controlled car parks

(c) Council-controlled boating areas (including any wharf, jetty, boat ramp, boat marshalling area)

(d) Designated freedom camping areas as defined in Council's Camping Control Bylaw 2015.

Council cemeteries, Council camping grounds

Dogs are prohibited in all Council-controlled cemeteries and camping grounds unless permission is obtained from the Council or signage indicates dogs are allowed and provided the person whom the dog is accompanying complies with any reasonable conditions imposed by the Council in relation to the entry or presence of the dog.

Walking tracks and picnic areas under the control of the Council

Every owner must comply with any restriction or prohibition of a sign to which Clause 4.7 applies.

Note: For convenience, playgrounds and the Urban Zones are shown on the maps in Schedule 2. For technical reasons other areas that are referred to above cannot be shown.

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Schedule 2

Local Community Dog Access Rules

This Schedule contains dog access rules specific to a local community that are in addition to the general dog access rules in Schedule 1.

For reference, default Schedule 1 rules have been incorporated into the maps such as playgrounds and Urban Zones.

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Southland District Council

Dog Control Bylaw 2025

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Schedule 2 – Local dog access rules

Document Revision

Date	Amendment	Amended by	Approved by	Approval date

Pursuant to the Local Government Act 2002 and the Dog Control Act 1996, the Council makes the following bylaw:

Part 1
Preliminary Provisions

1. Title and commencement

This bylaw may be cited as the Dog Control Bylaw 2025 and shall come into force on the 10th day of September 2025.

2. Repeal

The Southland District Council Dog Control Bylaw 2015 is repealed.

3. Application

Except as otherwise provided this bylaw applies to the whole of the district of the Southland District Council.

4. Interpretation

(a) In this bylaw, unless the context otherwise requires:

"The Act" means the Dog Control Act 1996.

"Council" means the Southland District Council or any person delegated by it to act on its behalf.

"Effective Control" means

- you are aware of where the dog is and what it is doing
- you are close enough to prevent issues including nuisance or danger to other people, animals, wildlife, and property
- you can bring the dog quickly to heel through verbal command, whistle, physical signal or gesture, or restraint.

"Public Place" means

- a place that, at any material time, is open to or is being used by the public, whether free or on payment of a charge, and whether any owner or occupier of the place is lawfully entitled to exclude or eject any person from that place; and
- includes any aircraft, hovercraft, ship or ferry or other vessel, train, or vehicle carrying or available to carry passengers for reward.

"Premises" means any land, dwelling, storehouse, warehouse, shop, cellar, yard, building, or part of the same, or enclosed space separately occupied, and all lands, buildings, and places adjoining each other and occupied together are deemed to be the same premises.

"Road" means that area of a road defined in the Local Government Act 1974 that is used or is reasonably usable for vehicular or pedestrian traffic and includes the margins of that area.

"Urban Zone" means those areas defined as urban zones in the Southland District Plan planning maps.

Working Dog means

- any disability assist dog
- any dog kept by the Police or any constable, the New Zealand Customs Service, the Ministry of Agriculture and Forestry, the Ministry of Fisheries, or the Ministry of Defence, or any officer or employee of any such department of State solely or principally for the purposes of carrying out the functions, powers, and duties of the Police or the department of State or that constable, officer, or employee; or
- kept solely or principally for the purposes of herding or driving stock
- kept by the Department of Conservation or any officer or employee of that department solely or principally for the purposes of carrying out the functions, duties, and powers of that department
- kept solely or principally for the purposes of destroying pests or pest agents under any pest management plan under the Biosecurity Act 1993
- kept by the Department of Corrections or any officer or employee of that department solely or principally for the purposes of carrying out the functions, duties, and powers of that department
- kept by AvSec or any officer or employee of that service solely or principally for the purposes of carrying out the functions, duties, and powers of that service
- certified for use by the Director of Civil Defence Emergency Management for the purposes of carrying out the functions, duties, and powers conferred by the Civil Defence Emergency Management Act 2002
- owned by a property guard as defined in section 9 of the Private Security Personnel and Private Investigators Act 2010 or a property guard employee as defined in section 17 of that Act, and kept solely or principally for the purpose of doing the things specified in section 9(1)(a) to (c) of that Act
- declared by resolution of the territorial authority to be a working dog for the purposes of the Act, or any dog of a class so declared by the authority, being a dog owned by any class of persons specified in the resolution and kept solely or principally for the purposes specified in the resolution.

(b) Any term not defined in this bylaw but which is defined in the Act shall have the meaning given to it by the Act.

Part 2
Regulation, control, and accommodation of dogs

5. Minimum standards of accommodation for dogs

(a) Every owner shall ensure that:

(i) dogs are provided with sheltered and dry sleeping quarters with access to clean water; and

(ii) measures are taken to enable dogs to keep warm in cold weather; and

(iii) sleeping quarters are large enough to allow the dog to stand up, turn around and lie down comfortably; and

(iv) dogs are able to urinate and defecate away from the sleeping area; and

(v) ventilation and shade is provided in situations where dogs are likely to experience heat distress; and

(vi) the shelter is kept in a sanitary condition.

6. Control of dogs in public places

(a) Except in the areas specified in Schedules 1 and 2 or otherwise required by the Act dogs in public places may be off-leash but must be under effective control at all times.

7. Control of dogs in designated dog exercise areas

(a) The owner of any dog (including a dog classified as a menacing or dangerous dog that is muzzled) may take that dog off-leash in any public place specified in Schedules 1 or 2 as a designated dog exercise area provided that dog is under effective control at all times.

8. Control of dogs in public places specified as on-leash areas

(a) No person shall take a dog into any public place specified in Schedule 1 or 2 as an on-leash only area unless the dog is controlled on a leash.

(b) Clause 8(a) does not apply to –

(i) any dog confined in a vehicle or cage; or

(ii) any working dog while it is under the control of its owner or handler.

9. Prohibition of dogs in certain public places

(a) No person may take a dog not confined in a vehicle or cage into any public place specified in Schedule 1 or 2 as a prohibited area.

(b) Clause 9(a) does not apply to:

(i) any working dog while it is under the control of its owner or handler.

(ii) a public place not under the control of the Council where the person in charge of that place has given permission for the dog to be there and the presence of the dog is in accordance with the conditions (if any) of that permission.

(c) No person shall take any female dog in season or a diseased dog into any public place unless –

(i) it is completely confined in a vehicle or cage for the purposes of transportation; or

(ii) it is in a public place not under the control of the Council where the person in charge of that place has given permission for the dog to be there and the presence of the dog is in accordance with the conditions (if any) of that permission.

10. Changes to dog access areas by public notice

(a) The Council may from time to time by public notice prohibit or impose additional conditions on the taking of dogs to any of the areas in Schedules 1 and 2 and walking tracks, picnic areas and roads under the control of the Council and those conditions shall apply accordingly as if they are conditions specified in the Schedules.

(b) The Council may from time to time by public notice make temporary changes to Schedules 1 and 2 in relation to leisure and culture events (including dog friendly events), dog training, threatened or 'at risk' protected wildlife vulnerable to dogs, and pest control. Those changes shall apply as if they are conditions specified in the Schedules.

(c) In this clause, public notice means one or more clearly legible notices affixed in one or more conspicuous places on, or adjacent to, the area to which the notice relates.

11. Dog faeces

(a) The person in charge of any dog that defecates in any public place must immediately remove and dispose of the faeces in a way that does not cause a nuisance.

(b) Clause 11(a) does not apply to any working dogs herding or driving stock on a road.

12. Multiple dogs on premises

(a) Except as provided in clause 12(b) no person may keep more than 2 dogs over 3 months of age on any premises for any period exceeding 14 days other than working dogs not being kept on premises in a predominantly urban or residential environment.

(b) Subclause (a) does not apply if –

(i) allowed by a licence issued under clause 13; or

(ii) an application for a licence under clause 13 has been made within 14 days of there being more than two dogs kept on those premises; or

(iii) the premises are over 50 hectares; or

(iv) the premises comprise a veterinary practice or a Council pound.

13. Licence for multiple dogs on premises

The Council may grant a licence to keep more than two dogs on any premises on such terms as it considers are reasonably necessary.

14. Requirement to neuter uncontrolled dog

The Council may require the owner of a dog to cause that dog to be neutered if that dog has not been kept under effective control on more than one occasion within a 12 month period.

15. Effect of requirement to neuter uncontrolled dog

(a) If a dog is required to be neutered, the owner of that dog must, within one month after receipt of the notice of the requirement, produce to the Council a certificate issued by a veterinarian certifying –

(i) that the dog is neutered; or

(ii) that for reasons that are specified in the certificate, the dog will not be in a fit condition to be neutered before a date specified in the certificate; and

(iii) must, if a certificate under subclause (a)(ii) is produced to the Council, produce to the Council, within 1 month after the date specified in that certificate, a further certificate under subclause (a)(i).

Part 3
Impounding, offences and penalties

16. Impounding

(a) A dog control officer or a dog ranger may impound any dog at large in breach of this bylaw, whether or not the dog is wearing a collar having the proper label or disc attached indicating that the dog is currently registered.

17. Offences and penalties

(a) A person who commits a breach of any bylaw authorised by this section commits an offence and is liable on conviction to the penalty prescribed by section 242(4) of the Local Government Act 2002.

Schedule 1

General dog access rules

This Schedule contains general dog access rules that apply across the Southland District.

1. Playgrounds and sports grounds under the control of the Council

Dogs are prohibited on any playground or sports ground at all times.

2. Urban zones, Council-controlled carparks and boating areas, designated freedom camping areas

Dogs must be under effective control and on a leash within or on all –

(a) urban zones as identified in the Southland District Plan; and

(b) Council-controlled car parks; and

(c) Council-controlled boating areas (including any wharf, jetty, boat ramp, boat marshalling area);

(d) designated freedom camping areas as defined in Council's Freedom Camping Bylaw 2015.

3. Council cemeteries and Council camping grounds

Dogs are prohibited in all Council-controlled cemeteries and camping grounds unless permission is obtained from the Council or signage indicates dogs are allowed and provided the person whom the dog is accompanying complies with any reasonable conditions imposed by the Council in relation to the entry or presence of the dog.

4. Walking tracks and picnic areas under the control of the Council

Every owner must comply with any restriction or prohibition of a sign to which clause 10 applies.

Note: For convenience, playgrounds and the Urban Zones are shown on the maps in Schedule 2. For technical reasons other areas that are referred to above cannot be shown.

Schedule 2

Local community dog access rules

This Schedule contains dog access rules specific to a local community that are in addition to the dog access rules in Schedule 1.

For reference, default Schedule 1 rules have been incorporated into the maps such as playgrounds and Urban Zones. This Schedule contains general dog access rules that apply across the Southland District.

Local Alcohol Policy Review

Record no: R/25/7/36056
Author: Ana Bremer, Senior policy analyst
Approved by: Vibhuti Chopra, Group Manager Strategy and Partnerships/Acting Chief Executive

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 This report provides Council a summary of the process for the review of the Local Alcohol Policy, together with analysis of key information to support proposed amendments to the current policy.

2 The report includes the draft Local Alcohol Policy and draft Statement of Proposal for consideration (attached).

Executive summary

3 A Local Alcohol Policy is an optional regulatory tool available to Councils. It can be seen as part of the wider local government approach to reducing alcohol harm, giving opportunity to communities to have their say on the direction of licensing matters.

4 Local Alcohol Policies set out a framework for licensing decision making and can set requirements relating to the location of licensed premises, the number or types of licenses issued, and maximum trading hours, amongst others. Where one exists, a review must be completed within a six-year period.

5 There are specific requirements for the development and review of a Local Alcohol policy which includes engagement with specific named parties in preparation of the policy ahead of consultation.

6 Council has a Combined Local Alcohol Policy which was developed in partnership with Invercargill City Council and covers the whole of the Southland District and Invercargill District area. It was adopted in December 2019 and became operative in March 2020. It is due for review by the end of March 2026.

7 Council staff have progressed the review alongside Invercargill City Council staff, and taking an issues-based approach, have decided to proceed with individual policies that address the sale, supply, and consumption of alcohol within the territorial authority areas.

8 The draft Local Alcohol Policy, draft Statement of Proposal, and Research report are presented for Council's consideration and approval for public consultation.

Recommendation

That Council:

a) receives the report titled "Local Alcohol Policy Review".

b) determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002.

c) determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) consider the information included within the research report, together with associated documents provided in support of the draft Local Alcohol Policy.

e) consider all feedback received during pre-engagement on the development of the draft Local Alcohol Policy.

f) consider the draft Local Alcohol Policy and draft statement of proposal and suggest any amendments for staff to complete prior to public consultation

g) approve the draft Statement of Proposal and draft Local Alcohol Policy for public consultation, on the basis any further amendments recommended by Council at this meeting will be made prior to the documents being made publicly available for consultation.

Background

9 The object of the Sale and Supply of Alcohol Act 2012 (the Act) 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.

10 Harm is defined very widely and includes any crime, damage, death, disease, disorderly behaviour, illness, or injury to individuals or the community either directly or indirectly caused by excessive or inappropriate alcohol consumption.

11 Reducing the physical and temporal availability of alcohol is one of the most effective and cost-effective measures to reduce alcohol consumption and harm, alongside increasing alcohol prices and restricting alcohol marketing.

12 Under section 75 of the Act, Territorial Authorities may develop Local Alcohol Policies (LAPs). These policies relate to the sale, supply, or consumption of alcohol within the district.

13 A LAP is an optional regulatory tool for Councils, part of the wider local government approach to reduce alcohol harm. Decision making on alcohol licence applications is undertaken through District Licensing Committee processes, enabling local community members to object to new licensed premises opening and contesting the granting of license renewal of existing premises.

14 Section 77 of the Act sets out the licensing matters that can be addressed through a LAP. These are:

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

15 LAPs cannot include policies on matters unrelated to licensing such as the price of alcohol, age limits for drinking or alcohol advertising and sponsorship.

16 LAPs reflect the policy choices of an elected territorial authority:

- they can be based on or influenced by community preferences. To that extent, they do not have to be evidence-based
- the Act contains default maximum trading hours, but local communities are free to choose trading hours which differ from these (but not more than the maximum)
- trading hours that are shorter (or longer) than the maximum default hours in the Act do not have to be justified in terms of departure from a norm.

17 Although a LAP should be tailored to the council's district, there does not have to be anything particular about that district to warrant deviation from what's in the Act.

Current LAP

18 Council's Combined Local Alcohol Policy (LAP) was developed in partnership with Invercargill Council. It covers the whole of the Southland District and Invercargill District area. It is due for review by the end of March 2026.

19 The purpose of a LAP is also to set a clear framework for the DLC and Alcohol Regulatory Licensing Authority (ARLA) when making decisions on licence applications in Southland, and to provide a guide to those applying for a licence in Southland.

20 The current LAP has been assessed to be working well by the District Licensing Committee.

Decision to progress separate policies

21 Council staff have progressed the review alongside Invercargill City Council staff given the current policy is combined. Both Councils have taken an issues-based approach to the review of policy statements and will proceed with individual policies that address the sale, supply, and consumption of alcohol within the territorial authority areas.

22 Gore District Council have indicated they are likely to mirror Southland District Council's LAP.

23 The option for Councils to adopt individual policies does not preclude future combined policies from being developed.

Review process

24 As per s97 of the Act, a Territorial Authority must review the policy utilising the Special Consultative Procedure no later than six years after it came into force and no later than the six years after the most recent review was completed.

25 When reviewing a LAP, the territory authority must follow the process as if it were the adoption of a new LAP (s95).

26 Staff have reviewed the current policy having regard to the information stated under s78(2) of the Act, including:

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.

27 Staff have consulted and sought information from police, licensing inspectors and medical officer of health. The information related to the nature and severity of alcohol related issues within the community and overall health indicators and has been provided in:

- the research report, Attachment C
- Te Whatu Ora – Southland Region alcohol data extract from the New Zealand Health Survey, Attachment D
- Te Whatu Ora – off licence density information, Attachment E
- Te Whatu Ora –Southland Hospital emergency department presentations, Attachment F
- New Zealand Police – Controlled Purchase Operations, Attachment G
- New Zealand Police – Southland District alcohol harm statistics, Attachment H.

28 Feedback from early engagement has also been attached (Attachments I-M). The Alcohol Health Watch Guide to inform LAP development has been provided (Attachment N)

Timeline for review

29 The proposed timeline for the review is:

MONTH	Milestone
27 August	**Council meeting** - Draft LAP/Draft SOP for consideration and adoption
10 September	**Council meeting** – Reserve date Draft LAP/Final SOP for adoption
October	***Elections - nothing***
November	Monday 3 Nov - Friday 12 Dec - SCP consultation period
December	Friday 12 December – consultation closes
January 2026	Staff review submissions, prep for hearings etc
February 2026	Hearings Deliberations
March 2026	Draft policy adopted / 30 day period notified
April/May (TBC)	Policy becomes operative

30 Dates for 2026 will be confirmed in the new year, when staff confirm resourcing and meeting dates.

Issues

31 Early engagement has been carried out with input and data sought from New Zealand Police, Te Whatu Ora, WellSouth and District Licensing Inspectors, in accordance with legislative and policy requirements.

32 Feedback was also sought from a range of community stakeholders who may have an interest in the LAP, including those involved in alcohol-harm prevention and reduction, healthcare, rehabilitation and support services, charities and community groups, Papatipu Rūnaka, as well as the tourism, retail and hospitality organisations.

33 As at the date of this report, responses have been received from New Zealand Police, the Medical Officer of Health, District Licensing Inspectors, Alcohol Healthwatch, Active Southland, and Hospitality NZ. WellSouth responded but do not collect the data specifically referred to in the current LAP. Input was also received from the District Licensing Committee members.

Feedback on review process

34 The Medical Officer of Health (MOH) provided feedback on the process undertaken regarding community consultation. This is included as Attachment M, and while it reads as being directed towards ICC, it is equally applicable to SDC's process given the initiation of review was based on a combined policy.

35 MOH indicated that a longer early engagement period should be used to develop a robust document in consultation with communities. MOH stated the formal consultation period may dissuade members of the public from providing feedback, as they assume the policy will largely be in a final state and Council will not consider substantive changes at that point.

36 Staff note that should any major issues arise through public consultation further consultation can take place on an amended draft LAP that addresses those issues. However, based on an assessment of the changes proposed to the current LAP, staff believe there would not be any further information gained through more extensive consultation with the community ahead of the public consultation period.

Summary table of feedback from early engagement

37 The following table provides a summary of feedback received during early engagement, and comments on the consideration and implementation of these suggestions.

Stakeholder feedback	Staff assessment
Alcohol Health Watch	
Broad Areas: through a LAP, territorial authorities may restrict licensed premises to a particular "broad area" such as a commercial or industrial zone but must first have regard to the district plan and its objectives and policies (section 78(2)(a) of the Act). LAP reviews present an opportunity to include a policy on "broad areas" with locations clearly identified where licensed premises can be established.	**There are no changes recommended at this time;** however, it is possible that this needs to be reconsidered because of SDC's spatial planning project. This will also be supported through a reduced review period.
Proximity to Other Premises: recommend the inclusion of a policy preventing new licensed premises from being located in close proximity to other licensed premises. Setting a distance rule would address the harm associated with the clustering of premises and could see, for example, off-licensed premises prevented from being established within, say, 50 or 100 metres of an existing off-licensed premises. Consider this prudent to consider this policy based on predicted growth in population and amenities and services.	Assessment of population projections for Southland District does not indicate fast growth. It is noted that these recommendations were more applicable to Invercargill City rather than Southland District. **There are no changes recommended at this time;** however, it is possible that this needs to be reconsidered because of SDC's spatial planning project. This will also be supported through a reduced review period.
Proximity to Sensitive Premises: current LAP has a sensitive premises policy with a minimum distance of 50 metres between a new on-licence, off-licence or club licence and a sensitive facility. Support the continuation of this policy that can prevent new licensed premises locating in close proximity to any school, childcare facility, pre-school, or other facility providing for the education or care of children, any place of religious gathering or assembly, any residential activity and any community facility (including playgrounds).	**There is no change recommended for the 50m minimum distance between a new on licence, off licence or club licence and a sensitive facility.**

Stakeholder feedback	Staff assessment
Definition of Sensitive Premises: recommend that consideration be given to expanding the range of sensitive premises subject to this policy to include health facilities (including rehabilitation treatment centres), marae and fale Pasifika.	Protecting vulnerable populations and users of sensitive premises can assist to address disproportionate and inequitable exposure to alcohol and experience of alcohol harms. **It is recommended the definition of sensitive premises includes "any health facilities and rehabilitation treatment centres, and any marae or fale Pasifika."**
Support for reducing trading hours for on-licences: for a later opening time that 8 am. Active Southland similarly supported later opening times, suggesting no earlier than 9 am.	**There are no changes recommended for trading hours for on licence venues.**
The use of a cap or a sinking lid on new licences: a policy on the issuing of further licences would reflect community concerns and align with research on the relationship between the proliferation of licenced premises and accessibility to alcohol and alcohol-related harm. A policy that institutes a cap or sinking lid can halt or reduce the existing numbers of outlets, particularly in areas where licensed premises have reached saturation levels or are located in high socio-deprivation areas.	There is potential for future development that may change this position, and the option remains to review the LAP at any time should the need arise **There is no change recommended to implement a sinking lid on licences.**
Additional conditions: that would prevent special licences being granted for events on school grounds or for events focused on children and young people under 18 years to limit their exposure to alcohol. This is also reflected in advice from MOH.	Special licences for children focussed events are rare in the district. This has not been identified as a priority to be addressed in the LAP at this time. **There is no change recommended.**
Discretionary Condition – Off-licence Restrictions on Buy Now, Pay Later (BNPL): as these schemes are considered an inappropriate method of payment and subvert established mechanisms to minimise harm to public health from alcohol by enticing the consumer with a much lower upfront price.	There are a small number of other councils who have introduced restrictions on BNPL. No local data has been found indicating a significant issue for the district. It is acknowledged there is a risk this could become a cause for concern in future. This issue should be monitored, and specific data obtained for the next LAP review. **There is no change recommended to implement restrictions on BNPL.**

Stakeholder feedback	Staff assessment
Discretionary Condition – Off-licence Restrictions on single sales: as such sales make alcohol affordable and are often linked to hazardous drinking by vulnerable people	It is recognised that restrictions on single sales could be a useful tool to reduce harm, and the option remains for the DLC to impose this. But there has again not been found evidence of a pressing local need to address this in the LAP.
Discretionary Condition – Off-licence Limitations on alcohol-related exterior signage or advertising: this would reduce the exposure of children to alcohol-related advertising and promotions	The current LAP has discretionary conditions relating to the "display of safe drinking messages/material" and "signage and advertising." **There is no change recommended to the current conditions on advertising.**
Discretionary Condition – Off-licence Mandatory age checks on the purchase and delivery of alcohol by remote sales	New Zealand legislation requires off licence holders to take "reasonable steps" to verify that purchasers and receivers of alcohol through remote sales (e.g. online sales for home delivery) are not underage. There are no further obligations as to age verification for licensees. **There is no change recommended for mandatory checks on purchase and delivery of remote alcohol sales.**
Discretionary Condition – Off-licence Restrictions on the marketing and promotion of non-alcoholic products that pose a high risk of alcohol-related harm, such as drinking games and risky items that encourage dangerous drinking (e.g., beer pong cups);	The current LAP has discretionary conditions relating to the "display of safe drinking messages/material" and "signage and advertising." There is no particular evidence that there is a local need for more detailed conditions relating to these matters. **There is no change recommended to implement restrictions on the marketing and promotion of non-alcoholic products such as drinking games and associated items.**
Discretionary Condition – Off-licence Restricting end of aisle sales of alcohol products, as this has shown to increase sales by as much as 23 to 43 percent and would have a significant impact on alcohol consumption	The current LAP has discretionary conditions relating to the "display of safe drinking messages/material" and "signage and advertising." **There is no change recommended to implement restriction of end of aisle sales of alcohol products.**

Stakeholder feedback	Staff assessment
Discretionary Condition – Off-licence Requirement to have FASD (Fetal Alcohol Spectrum Disorder) warning signage within the alcohol area in supermarkets and grocery stores and at point of sale at bottle stores	The current LAP has discretionary conditions relating to the "display of safe drinking messages/material" and "signage and advertising." **There is no change recommended to implement a requirement to have FASD (Fetal Alcohol Spectrum Disorder) warning signage.**
Mandatory one-way door restriction for certain on-licences premises such as taverns, bars, clubs. One-way door restrictions would help prevent a large number of people coming out of licensed premises at the same time (as would be the case with a universal maximum closing time) and the potential for intoxicated patrons migrating between venues or interacting with others with an increased likelihood of disorder and crime.	Alcohol Healthwatch have noted in their 'Guide to inform local alcohol policy development, 2024' that there is mixed evidence on how useful one-way door restrictions are. Without local issues being identified, there is no identified priority to introduce such a restriction in the LAP at this time. **There is no change recommended for implementing mandatory one-way door restrictions.**
Active Southland	
Reduced period of three years for review, given much can change in six years relating to alcohol harm and prevention measures.	This is not recommended due to the extensive level of effort and resource required to review the Local Alcohol Policy. **A four yearly review period has been recommended.**
Mandatory age checks on the purchase and delivery of alcohol by remote sales particularly mechanisms such as UberEats, DoorDash etc	Online remote sales (Uber, DoorDash, DeliverEasy) are licensed by the DLC in the area the parent company is located (i.e., for DeliverEasy – Auckland DLC). None of these services are available in the wider Southland District at present. **There is no change recommended for mandatory checks on purchase and delivery or remote alcohol sales.**

Stakeholder feedback	Staff assessment
Restrictions on the use of glass containers at special events. This is also supported by the MOH.	Staff have found many LAPs are including restriction on glass vessels at special events. **An additional discretionary condition has been proposed:** **"For special licences, the Committee may impose restrictions on the use of glass containers."**
New Zealand Police	
New Zealand Police stated their view is the current LAP is fit for purpose and there is no need to make a submission to give consideration to any additions or changes to the policy. Police would not dispute or discourage any topics being submitted by the other reporting agencies and therefore being given consideration by policy makers.	
Hospitality New Zealand	
Sensitive Premises: Concerned about existing licence holders being required to consult with sensitive premises as part of renewal applications, as this introduces additional procedural hurdles and uncertainty, noting the perceived risk of existing hospitality businesses being unfairly penalised if a sensitive site was to locate nearby after the licensed premises had already been established. Recommend making it clear that consultation requirements should only apply to new licence applications rather than renewals for sites that were established before the sensitive premises came into being.	The requirement to consult with sensitive premises applies to licence renewals where that renewal pertains to a "significant change in the style or operation of the business". The current provision could be amended to clarify that the requirement does not apply to new applications where this is made solely because of a change of ownership, provided the licence type and scope of the new licence are the same as the existing licence for the premises. **An addition to Sensitive Premises is proposed:** **"Evidence of consultation will also not be required where the application is for a new licence due to a change in ownership of the premises, provided the licence type and scope of the new licence are the same as the existing licence for the premises"**

Stakeholder feedback	Staff assessment
Trading hours: Retaining the current status quo for on-licence trading hours on the basis that well-run licensed venues play a key role in supporting safe and responsible alcohol consumption, and that reducing trading hours for these venues risks pushing consumption of alcohol to unlicensed or unsupervised environments, which could result in greater risk of alcohol related harms	**There are no changes recommended for trading hours for on licence venues.**
Discretionary Conditions: should be applied on a case-by-case basis rather than by default, due to concerns about the potential burden on responsible operators without reducing alcohol related harm.	The discretionary provisions already allow the DLC to decide which provisions are considered. **There are no changes recommended to the application of discretionary provisions.**
Discretionary Conditions: 'Training in Host Responsibility' is a requirement under the Sale and Supply of Alcohol Act and is a standard component of Duty Manager certification and ongoing compliance. This should not be included as a discretionary condition as it duplicates existing legal obligations and adds administrative burden.	The LAP does not include Host Responsibility Training in Discretionary Provisions. **There is no change recommended.**
District Licensing Committee	
The LAP and the Alcohol Control bylaw are sufficient for most, easy to read /digest by most quickly. Nothing seen/heard in this triennium points to a need for more detail. SDC have a later off licence provision of 11pm instead of 10pm, partly because of submissions to do with rural contractors in summer.	**The draft LAP proposes options for the reduced trading hours for off licences. These will be offered alongside the status quo.**
There were options we could have included, when the policy was formed, such the one-way door whereby people who left an establishment were refused readmission or service would cease for a period each hour for a certain time. These weren't seen as being helpful.	**There is no change recommended to implement a one-way door policy.**

Stakeholder feedback	Staff assessment
It is possible that local government may be moving to a four-yearly election cycle in the future.	A four-year election cycle for local government has not been confirmed. **A four yearly review period is recommended.**
Medical Officer of Health	
Sensitive sites: recommend the extension of the separation distance to sensitive facilities from 50m to 100m, and a ban on new licences being granted within 100m, rather than simply a requirement to consult.	As above, **there is no change recommended for proximity to sensitive sites.**
Trading hours - On-licences: recommend that on-licensed premises close of trading hours move from 3.00am to 1.00am so as to be consistent with maximum trading hours advocated for Invercargill. Suggest that an 8am opening time is too early and should be no earlier than 9:00am.	As above, **there are no changes recommended for trading hours for on licence venues.**
On-licences – other: recommend dot point is deleted as it provides for an unrestricted environment. The LAP should be silent for these other arrangements and that the provisions applying to taverns and restaurants should be used as a guide.	Unaware of any other Local Alcohol policies that have a permissive clause of this nature. **It is recommended the wording is changed to this to remove 'no restriction'.**
Trading hours - Off-licences: Recommend all off-license hours to move from 9.00am to 9.00pm. We commend you for noting these hours have been included as an option for your draft Local Alcohol Policy**.**	**The draft LAP proposes options for the reduced trading hours for off licences. These will be offered alongside the status quo.**
Trading hours - Club licences: Maximum operating hours for Club Licences should meet the requirements of the club but they should not be any more permissive than what we have recommended for on-licences (above).	**There are no changes recommended for trading hours for club licences.**
Special Licences: recommend that for child-focused or family events, they are not granted (S77(1)f). This is drawn from the Wairoa District Local Alcohol Policy.	As above. This has not been identified as a priority to be addressed in the LAP at this time. **There is no change recommended.**
Special Licences: recommend that the event finishes no later than 1.00am. We also recommend a duration of no more than 6 hours. The Waikato District Council supports 1.00am closing. The 6-hour duration is currently practiced in the Central Otago District and the break in service clause is in the existing Dunedin City Local Alcohol Policy.	**There is no change recommended regarding the duration or the finishing times of special licences.**

Stakeholder feedback	Staff assessment
Discretionary Conditions - Signage and advertising: recommend that for off-license there is no promotional advertising on the premises' exterior and signage apart from the name of the store (S77(1)f).12 Also for off-license premises, ensure that the front window area is frosted to a height of 1.5 metres and not to display alcohol above this height or in a manner visible to those walking or driving past the store (S77(1)f).	There is no change proposed unless Council considers the restriction as a compromise on MOH feedback. **Council could consider restricting alcohol related signage to no more than 50% of the area of the external area of the premises.**
Off-licence Density: There is a higher density of off-licences in the most deprived areas of Southland although we do note that the towns tend to be more deprived than the rural areas. To help address this issue, we recommend a sinking lid (or at the very minimum, a freeze) on the issue of off-licences in NZDep 7 to 10 areas (2023 census) in Southland (S771)a)).	There is potential for future development that may change this position, and the option remains to review the LAP at any time should the need arise **There is no change recommended to implement a sinking lid on licences.**
Staffing: "Staffing" as it relates to Club Licences is good, but it needs to be strengthened to the effect that certified duty managers to be present at all Club licences trading after 8.00pm or if there are more than 50 patrons present (S77(1)f).	**Council could consider requiring certified duty managers to be present at all Club licences trading after 8.00pm or if there are more than 50 patrons present (S77(1)f)**
Remote Alcohol sales and delivery: For Off licences that deliver alcohol, recommend a minimum of three hours between placement of an order and delivery of alcohol to a customer. Recommend a clause that effectively states that alcohol deliveries cannot take place outside the maximum hours permitted for an off-licence.	It is acknowledged this could become a cause for concern in future. This issue should be monitored, and specific data obtained for the next LAP review. **There is no change recommended to implement restrictions on remote alcohol sales and delivery.**
Remote Alcohol sales and delivery: Buy now/pay later schemes (e.g. "Layby®" or "Afterpay®") promote impulse spending, so are not appropriate for purchasing an addictive, harmful drug like alcohol. Recommend the prohibition on use of credit/after pay services to procure alcohol from off-licences (S77(1)f).	As above. It is acknowledged this could become a cause for concern in future. This issue should be monitored, and specific data obtained for the next LAP review. **There is no change recommended to implement restrictions on BNPL.**
Maximum number of drinks per serve for special licence events: to be no more than two standard drinks, and where the event is high-risk, including but not limited to events targeting younger age-groups, no more than one standard drink per serve S77(1)f). Being only able to purchase a small number of drinks provides for those serving the drinks to assess the patron's level of intoxication.	**There are no changes recommended for the maximum number of drinks per serve for special licence events.**

Stakeholder feedback	Staff assessment
Register of Incidents: draft LAP makes provision for a register of incidents. For applicants for a new on-licence or off-licence we recommend there is provision for the requirement for a prospective licensee to produce a local Social Impact Report to support their licence application(S77(1)f). These provisions are consistent with the Auckland Local Alcohol Policy.	**There are no changes recommended for the requirements of Local Social Impact Reports.**
Consider the closure of relevant off licences at sensitive times (e.g. school pick-up times) (S77(1)f). This has been applied in the Rotorua-Lakes and Whakatane Districts on what we understand to be a voluntary basis as there is a reference to it in the media but it does not appear in their Local Alcohol Policy.	**There are no changes recommended to close off licences at sensitive times.**
Single sales: for off-licence applications, we recommend prohibitions on single sales of shots, RTDs and mainstream beers (exemption for craft beers) (S77(1)f).	**There are no changes recommended on the prohibition of single sales for off licence applications.**

Statement of Proposal

42 The draft LAP must use the SCP process for consultation. A Statement of Proposal has been prepared as required for this process. The draft Statement of Proposal is included as **Attachment B.**

Proposed amendments to the LAP Southland District focused Local Alcohol Policy

43 As previously discussed, Council staff have taken an issues-based approach to the review of policy statements and will proceed with individual policies that address the sale, supply, and consumption of alcohol within the territorial authority areas.

44 The draft policy is included as **Attachment A**.

Off-licence Trading Hours – Options to reduce

45 LAPS can set maximum trading hours under s77(1)(e) of the Act. Restricting the hours of operation for off licences reduces availability and is a key means of reducing alcohol harm. Reducing trading hours was strongly supported through early engagement feedback, and it is anticipated that these stakeholders would support reduced trading hours during the formal consultation period. As discussed in the research report, studies have found that most alcohol-related harm, particularly chronic harm, is associated the availability of alcohol from off licences.

46 The draft LAP will provide options for consideration, to either retain the status quo for trading hours, or reduce trading hours for off-licences. The options included for consultation are:

- 7 am on any day until 11 pm on the same day (status quo)
- Opening – further options for 8 am or 9 am on any day
- Closing – further options for 10 pm or 9 pm on the same day

47 This could result in a mix of status quo hours and new hours (i.e. 9am opening and 11pm closing).

48 There is a possibility that the community may not support a reduction in hours. The 11 pm closing time has been upheld by community members during previous public consultation on trading hours.

49 It is noted that no off licences in Southland District are currently open until 11 pm (despite the majority being licensed to 11 pm) with the latest trading hours being 10 pm.

50 There is a growing trend of reducing off licence trading hours, particularly since the Supreme Court decision which confirmed Auckland City Council's LAP with its 9.00 pm closing time for off licenses. This is now the latest closing time in Auckland, Christchurch, Gisborne, Hauraki, Hurunui, Mackenzie, Timaru, Waimate, Matamata-Piako, Porirua, Rotorua Lakes, Thames-Coromandel.

51 Ashburton, New Plymouth, Stratford and Wairoa have a closing time of 9.30 pm, and Dunedin, Hasting, and Whanganui are recommending 9.00 pm closing as part of their LAP reviews.

52 Overall, LAPS with an 11,00pm closing time are in the minority, with only three others being identified within the approximately 40 other LAPs in force/under development.

Sensitive Premises – definition

53 Both Alcohol Healthwatch and the MOH support the widening of the definition of "sensitive premises" to include health facilities (including rehabilitation treatment centres) and marae.

54 The marae is a tapu place central to Māori values and philosophy, and in relation to health, enhances access to te ao Māori by emphasising tikanga, whānau and a holistic approach to health. This may include help for alcohol issues.

55 It is recommended the definition of sensitive premises includes "any health facilities and rehabilitation treatment centres, and any marae or fale Pasifika."

56 This is in effort to reduce community harm that may arise from a licensed premise being established near these facilities, where people who may be more likely to experience harm are located. The inclusion of these places is reflected in LAPs across the country.

Sensitive Premises – evidence of consultation

57 The requirement to consult with sensitive premises applies to licence renewals where that renewal pertains to a "significant change in the style or operation of the business".

58 The current provision could be amended to clarify that the requirement does not apply to new applications where this is made solely because of a change of ownership, provided the licence type and scope of the new licence are the same as the existing licence for the premises.

59 It is proposed that the following statement is included: "Evidence of consultation will also not be required where the application is for a new licence due to a change in ownership of the premises, provided the licence type and scope of the new licence are the same as the existing licence for the premises."

60 **Discretionary Conditions - Signage and advertising:**

61 Advice from MOH recommended that for off license there is no promotional advertising on the premises' exterior and signage apart from the name of the store (S77(1)f).12 Also for off license premises, ensure that the front window area is frosted to a height of 1.5 metres and not to display alcohol above this height or in a manner visible to those walking or driving past the store (S77(1)f).13.

62 There is no change proposed unless Council considers the restriction as a compromise on MOH feedback.

63 Council could consider restricting alcohol related signage to no more than 50% of the area of the external area of the premises.

Staffing

64 Advice from MOH is that "Staffing" as it relates to Club Licences is good, but it needs to be strengthened to the effect that certified duty managers to be present at all Club licences trading after 8.00pm or if there are more than 50 patrons present (S77(1)f).

65 Council could consider requiring certified duty managers to be present at all Club licences trading after 8.00pm or if there are more than 50 patrons present (S77(1)f)

Review period

66 The LAP review has coincided with local government election timeframes. The draft policy proposes the next review takes place in four years' time to get off cycle with elections. This means the next review would need to take place by March 2030 (approximately).

Consultation stakeholders – Primary Health South (WellSouth)

67 The current LAP requires consultation with Primary Health South regarding monitoring statistics of education outcomes and an outline of community issues. Primary Health South has been replaced by WellSouth and no longer provide any education programmes relating to alcohol. They do not specifically collect alcohol related data. For the current review, this information was sourced from Te Whatu Ora Health NZ and the Medical Officer of Health.

68 It is recommended that Primary Health South is removed from the list of required consultation stakeholders within the LAP.

Overall format and style

69 The overall format has been changed to reflect Southland District Council's policy style.

70 All references to a combined Local Alcohol Policy and Invercargill City Council (and specific ICC location) have been removed.

Factors to consider

Legal and statutory requirements

71 LAPs are quite restricted in their content, and key legislative points concerning LAPs are:

- councils must not produce a draft policy without having consulted the police, inspectors and medical officers of health (s78(4)).
- if a council decides to produce a LAP it must first produce a draft policy, that has regard to a number of matters (s78(2))
- after producing a draft policy, councils use the special consultative procedure to consult on the draft policy (s79).

72 These key points have been met through the review of this policy.

73 Any changes to trading hours would take effect three months after the new LAP is notified.

74 There are no longer any appeal rights following the Sale and Supply of Alcohol (Community Participation) Amendment Act 2023.

75 Should Council choose not to approve the draft policy and statement of proposal for public consultation, the current LAP remains in place and the District Licensing Committee can still use the policy.

76 There are no legislative issues identified in delaying public consultation, however it is noted that this would delay the review, and proposed timeframes would need to be amended.

77 If not adopted during the current meeting, the draft policy and statement of proposal could be provided to Council as early as November 2025. This would impact the dates for public consultation, and staff recommend the consultation period is extended to two months (post Council adoption) to ensure adequate time for engagement (considering proximity to end of year wind down/holiday period).

Community views

78 Early engagement with required stakeholders has helped direct the options for changes within the draft Local Alcohol Policy.

79 The review of the Local Alcohol Policy must use the Special Consultative Procedure. Staff have planned the SCP period to take place from 9am Monday 3 November until 5pm, Friday 12 December.

80 Community views will be sought during the public consultation period. Hearings will take place in February 2026, should any submitters choose to attend these. Dates will be confirmed in 2026.

Costs and funding

81 Costs associated with the review of the LAP will be met within current budgets.

Policy implications

82 The current LAP will remain operative until the new LAP is notified in 2026.

Analysis

Options considered
Two options have been identified

- Option 1 - approve the draft Statement of Proposal and draft Local Alcohol Policy for public consultation, on the basis any further amendments recommended by Council at this meeting will be made prior to the documents being made publicly available for consultation
- Option 2 – do not approve the draft Statement of Proposal and draft Local Alcohol Policy and agree for staff to report back to Council in the new triennium.

Analysis of options

Option 1 – approve the draft Statement of Proposal and draft Local Alcohol Policy for public consultation, on the basis any further amendments recommended by Council at this meeting will be made prior to the documents being made publicly available for consultation

Advantages	*Disadvantages*
• provides opportunity for community to comment on proposed amendments • is part of a process that aims to assist in improving the overall health and wellbeing of our communities • allows review process to continue in line with proposed timeframes	• may require further consultation if significant changes are proposed • a LAP results in more monitoring and reporting. As it is not compulsory, it could be viewed as an additional administrative with a financial cost attached.

Option 2 – do not approve the draft Statement of Proposal and draft Local Alcohol Policy for public consultation and agree for staff to report back to Council in the new triennium

Advantages	*Disadvantages*
• provides incoming Council the opportunity to make comments on the proposed policy and provide further options for inclusion	• would delay the review until the next triennium

Assessment of significance

83 Staff have assessed this policy in line with Councils Significance and Engagement policy and believe this meets the threshold for being a significant decision. This is due to statutory requirement for the review of the policy using the Special Consultative Procedure to seek views and input on the draft policy. This decision is also significant due to the nature and extent of community harm being addressed through the implementation of the policy.

Recommended option

84 Option 1 – approve the draft Statement of Proposal and draft Local Alcohol Policy for public consultation, on the basis any further amendments recommended by Council at this meeting will be made prior to the documents being made publicly available for consultation.

Next steps

85 Staff will proceed with any suggested amendments to the draft SOP and draft LAP.

86 Public consultation using the Special consultative procedure will begin in October 2025.

Attachments

A Draft Local Alcohol Policy 2026 ⇩
B Draft Local Alcohol Policy 2026 - Statement of Proposal
C Research Report - Local Alcohol Policy Review
D Te Whatu Ora Ministry of Health - Southland Region alcohol data extract from New Zealand Health Survey
E Te Whatu Ora Ministry of Health - Off-licence Density information - Southland
F Te Whatu Ora Ministry of Health - Emergency Department Presentations Southland Hospital 2024
G Local Alcohol Policy 2025 - NZ Police - SDC Controlled Purchase Operations
H Local Alcohol Policy 2025 - NZ Police - Southland District Council Alcohol Harm Stats
I Local Alcohol Policy Feedback - Active Southland
J Local Alcohol Policy Feedback - Alcohol Harm Prevention Officer
K Local Alcohol Policy Feedback - Hospitality NZ Southland/Invercargill Combined LAP Pre-Review 2025 Submission
L Local Alcohol Policy Feedback - Alcohol Healthwatch Invercargill Southland LAP pre engagement 30 June 2025
M Local Alcohol Policy Feedback - Medical Officer of Health
N Alcohol HealthWatch Guide to inform local alcohol policy development October 2024

DRAFT Local Alcohol Policy

Group Responsible:	**Environmental Health**
Date Approved:	**xx xx 2026**
Date Operative:	**xx xx 2026**
Next Review date:	**xx xx 2030**
File No:	*r/x/xx/xx*

Introduction

A Local Alcohol Policy (LAP) enables local authorities to make a meaningful contribution towards addressing issues associated with the sale, supply or consumption of alcohol.

This Local Alcohol Policy (the policy) has been developed in recognition of the significant harm that the excessive consumption of alcohol has in our communities.

The policy is in line with the Sale and Supply of Alcohol Act 2012 (the Act), to ensure that alcohol is sold and supplied in a safe and responsible manner and to ensure that the harm arising in individuals and communities, as a consequence of alcohol consumption, is minimised.

The policy aims to inform the decisions of the District Licensing Committee (the committee) on alcohol licences for the sale of alcohol within the Southland District boundaries (the LAP district)

The policy will provide direction as to whether alcohol licences shall be granted and what licence conditions could be imposed.

Purpose

The purpose of the Policy is to set out the Council's policy positions on the following licensing matters, pursuant to section 77(1) of the Act:

- maximum trading hours;
- location of licensed premises by reference to proximity to premises or facilities of a particular kind or kinds; and
- whether further licences (or licences of a particular kind or kinds) should be issued for premises in the district or any stated part of the district.

Scope

Through the LAP, the committees are able to:

- limit the **location** of licensed premises in particular areas or near certain types of facilities, such as specific neighbourhoods or near schools or churches
- limit the **density** of licensed premises by specifying whether new licences or types of licences should be issued in a particular area

- impose **conditions** on groups of licences, such as a 'one way door' condition that would allow patrons to leave premises but not to enter or re-enter after a certain time
- recommend **discretionary conditions** for licences
- provide for the maximum trading hours of on, off and club licences.

Definitions

Alcohol	Means a substance that is or contains a fermented, distilled or spirituous liquor; and at 20°C is found on analysis to contain 1.15% or more ethanol by volume; or that is a frozen liquid, or a mixture of a frozen liquid and another substance or substances; and is alcohol when completely thawed to 20°C; or that, whatever its form, is found on analysis to contain 1.15% or more ethanol by weight in a form that can be assimilated by people
Cellar door	Includes tasting rooms at a brewery or distillery. It excludes the sale of alcohol not brewed, distilled or made by that licence holder.
Club	Means a body that is a body corporate having its objective (or as one of its objects) participating in or promoting a sport or other recreational activity, otherwise than for gain; or is a body corporate whose object is not (or none of whose objects is) gain; or holds permanent club charter
CPTED principles	Means *Crime Prevention Through Environmental Design* and are set out in the Health Promotion Agency publications *Safer Bars and Restaurants – A guide to Crime Prevention Through Environmental Design (CPTED)* and *Safer Bottle Stores - A Guide to Crime Prevention Through Environmental Design (CPTED)*
Entertainment venue (includes centre)	Means a venue that is used to provide entertainment. The entertainment may be arranged and organised by the owner/operator of the venue and features some or all of the following: • a reasonable cover charge would apply – to be included in all advertising of any entertainment event • live entertainment would be provided on a regular, frequent and ongoing basis (live entertainment is entertainment by way of live performers, including bands, solo artists, live DJs, comedians) • a stage, dance floor or similar area would be available for entertainers and/or patrons to use • the design of the premises including the size of the bar will be required to be consistent with the nature of the principal form of entertainment.
Function centre	Means a centre that is used to host events/gatherings or occasions regardless of whether or not the centre has its own licence or is linked to another licensed venue
Higher risk periods	Means a period of time where either the number of patrons is likely to exceed a specified number, or the type of event is assessed to be

	of greater risk. These higher risk periods will be determined by the committees on a case-by-case basis
Host responsibility	Means a policy and/or a plan designed to reduce the abuse of alcohol by creating and promoting a safe drinking environment
Intoxicated	Means observably affected by alcohol, other drugs, or other substances (or a combination of two or all of those things) to such a degree that two or more of the following are evident: • appearance is affected • behaviour is impaired • coordination is impaired • speech is impaired.
LAP district	Means the territorial district of Southland District Council
Licence	Means a licence issued under the Sale and Supply of Alcohol Act 2012 that is in force; and in relation to any licensed premises means the licence issued for them (or, in the case of premises that two or more licences have been issued for, any of those licences
Sensitive premises	Means any school, childcare facility, preschool or other facility providing for the education or care of children, or any place of religious gathering or assembly, or any residential activity including a dwelling or apartment, or any community facility, or health facilities and rehabilitation treatment centres, and any marae or fale pasifika within 50 metres of the address with or applying for the licence.
Significant change in style	Includes any increase in the risk level to a premise (for example going from a restaurant to a night club/bar) and/or where the nature of the operation is likely to change
Trading hours	Means the hours a business may be licensed to be open to sell or supply alcohol

Principles

Identifying the problem

Alcohol misuse is a social problem and public health problem with significant implications for the social and economic well-being of people in the LAP district.

A minority of the alcohol sold is consumed in licensed premises or at licensed events, where there is supervision, control and host responsibility. A majority of alcohol is consumed in situations where there may be little control or supervision.

It is a priority to reduce the harm caused by alcohol misuse

Alcohol misuse is a serious social problem and public health problem. Council will recognise and address alcohol misuse through their policies and through the way they deliver services to the people in the LAP district. Council can also address alcohol misuse through their responsibilities under the Act.

The policy is a way people in the region can address alcohol misuse.

Providing a safe drinking environment

It is important that there are safe environments for the responsible sale, supply and consumption of alcohol.

Through this policy, the councils will:

- place significant emphasis on host responsibility, particularly in assessing applications and imposing conditions of approval
- encourage organisers of an event or special occasion to properly plan for it, if alcohol is to be available.

Policy

Trading hours

The following shall be the maximum trading hours for the sale, supply and consumption of alcohol (within the context of alcohol licences) on licensed premises within the LAP district:

On-licences – bars, taverns, hotels, entertainment venues and Class 1 restaurants

- earliest opening time 8am on any day
- latest closing time 3am the following day

On-licences – class 2 and class 3 restaurants, including BYO restaurants

- earliest opening time 8am on any day
- latest closing time 1am the following day.

On-licences – other

Applications for licences will need to justify the hours requested in terms of the purpose of the function or event. Including but not limited to:

- function centres
- theatres
- boats and lodges in Milford Sound
- caterers
- cellar doors

Off-licences – this includes dedicated 'bottle store' outlets and 'across the bar' sales, and supermarkets or convenience stores

- earliest opening time 7am on any day
- OR 8am
- OR 9am
- latest closing time 11pm the same day

- OR 10pm
- OR 9pm

Club licences

Applications for club licences will need to justify the hours requested on the basis of the activity of the club.

- earliest opening time 8am on any day
- latest closing time 3am the following day.

Special licences

No restriction, however applications for special licences will need to justify the hours requested in terms of the purpose of the function or event.

All above provisions are subject to sections 47, 47A and 48 of the Act, which relate to the sale and supply of alcohol on ANZAC Day morning, Good Friday, Easter Sunday and Christmas Day.

Sensitive premises

When the councils receive an application for a proposed on, off or club licence or a renewal where the application pertains to a significant change in the style or operation of the business (not including special licence applications), evidence of consultation with all applicable sensitive premises shall be provided with the application, if the licensed premises is within 50 metres of the boundary of a sensitive premise.

Sensitive premises are:

- any school, childcare facility, preschool or other facility providing for the education or care of children
- any place of religious gathering or assembly
- any residential activity – dwelling or apartment
- any community facility
- any health facilities and rehabilitation treatment centres
- marae, fale pasifika

In relation to providing evidence of consultation with a tenanted property, the applicant will have to provide evidence that they consulted with both landowners and tenants.

Evidence of consultation will not be required where resource consent has been granted under the Resource Management Act 1991. Evidence of consultation will also not be required where the application is for a new licence due to a change in ownership of the premises, provided the licence type and scope of the new licence are the same as the existing licence for the premises.

This requirement is to ensure that neighbouring properties are aware of the possibility that a licensed premise may be established nearby or that an existing licensed premise may have its licence renewed or altered. This requirement also ensures the occupants, owners or other parties related to a sensitive premise have an opportunity to voice any concerns, and for the applicants to respond to these.

Discretionary conditions

The act enables the committees to issue a licence subject to discretionary conditions that are consistent with the act. In terms of promoting responsible sale and supply, conditions that might be imposed include, but are not limited to:

- premises layout and design
  - design and layout requirements
  - minimum seating requirements
- staffing
  - training requirements for staff
  - management requirements in relation to staff (eg number of staff, duty managers)
  - prescribed ratio of security staff to patrons
  - uniform requirements (eg high visibility vests for security staff)
  - certified manager to be on duty at club-licensed premises, excluding chartered clubs, when alcohol is being sold or supplied during higher risk periods that are determined by the committees.
- host responsibility
  - queue management
  - provision of food
  - management of an event in such a way as to reduce abuse of alcohol
  - availability of transport home for patrons
  - display of safe drinking messages/material
  - any other matter that can encourage responsible alcohol sales, supply and consumption
- amenity and good order
  - cleaning the outside of the premises and immediate environs
  - use of CCTV
  - signage and advertising
- management of incidents
  - licensee to keep a register of incidents
  - mandatory notification to Police of violent incidents
- utilising CPTED principles
- for special licences, the Committee may impose restrictions on the use of glass containers.

The committees can impose such conditions they deem to be appropriate, from the list.

The process for setting discretionary conditions aims to encourage a good working relationship between the councils and industry providers. The discretionary conditions also help promote the purposes of the act.

Monitoring and Review

The policy will be reviewed four-yearly to ensure it is up to date, relevant and meets legal requirements.

At the review stage, information relating to alcohol related harm for the area will be gathered.

The following information will be sought:

- monitoring reports of premises and events, and the conditions imposed on licences (from the councils' licensing inspectors)
- statistics of hospital admissions of alcohol-related harm incidents and associated costs that relate to the LAP district (from the Southland District Health Board/Te Whatu Ora Health NZ)
- monitoring statistics of education outcomes and an outline of community issues (from Southland District Health Board/Te Whatu Ora)
- statistics on alcohol related crime in the region's communities, as well as controlled purchase operations (from the New Zealand Police).

Related Documents

Southland District Council intend to maintain and enforce existing alcohol and alcohol ban areas established under a bylaw or bylaws promulgated under the Local Government Act 2002.

Southland District Council Alcohol Control Bylaw

Sale and Supply of Alcohol Act 2012

Local Government Act 2002

DRAFT Local Alcohol Policy – Statement of Proposal

1. Introduction

Southland District Council (Council) is reviewing the Local Alcohol Policy (LAP).

The LAP is a policy concerning the licensing of premises for the sale and supply of alcohol.

The current LAP was adopted in December 2019 and became operative on 31 March 2020. It is a combined policy with Invercargill City Council. The LAP states that it will be reviewed six-yearly, as required by Section 97 of the Sale and Supply of Alcohol Act 2012 (the Act).

The draft LAP being consulted on applies only to Southland District. This change is a result of a robust issues-based approach to reviewing the LAP and the ability for both Councils to support licensing within their own LAP districts.

Council is seeking feedback on the draft policy over a submission period that will run from October to December 2025. People who make a written submission can request to also make an oral submission to Council.

2. Background information

Council is reviewing the LAP to confirm the policy is still relevant for licensing within the territorial boundaries of the council.

Council view the LAP as an important tool to assist the District Licensing Committee in making its decisions and to help achieve the objective of the Sale and Supply of Alcohol Act 2012 (the Act).

The object of the Act is that:

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

3. Summary of proposed changes

The draft LAP is included as Attachment A.

The current LAP contains the following types of licensing policies:

- sensitive premises
- trading hours
- discretionary conditions

The draft LAP is largely the same as the current LAP. However, Council have recognised a national trend towards reducing trading hours for off licence premises, through the review of Local alcohol policies across the motu. The draft LAP provides three options for trading hours, for community consideration.

Council have recommended the timeframe for review is also reduced, to ensure the review is not in sync with election processes and allow for any licensing concerns to be addressed at an earlier stage.

There have also been changes to streamline the policy in terms of content and style.

Current element	Proposed amendment	Summary of reasons
Sensitive premises		
The requirement to consult with sensitive premises applies to licence renewals where that renewal pertains to a "significant change in the style or operation of the business".	**An addition to Sensitive Premises is proposed:** **"Evidence of consultation will also not be required where the application is for a new licence due to a change in ownership of the premises, provided the licence type and scope of the new licence are the same as the existing licence for the premises"**	The current provision could be amended to clarify that the requirement does not apply to new applications where this is made solely because of a change of ownership, provided the licence type and scope of the new licence are the same as the existing licence for the premises.
Definition of Sensitive Premises	**It is recommended the definition of sensitive premises includes "any health facilities and rehabilitation treatment centres, and any marae or fale Pasifika."**	The marae is a tapu place central to Māori values and philosophy, and in relation to health, enhances access to te ao Māori by emphasising tikanga, whānau and a holistic approach to health. This may include help for alcohol issues. This is in effort to reduce community harm that may arise from a licensed premise being established near these facilities, where people who may be more likely to experience harm are located. The inclusion of these places is reflected in LAPs across the country.
Trading hours		
On-licences	No change	
On-licences - other	Deleted – 'no restrictions'	No other LAPs have a permissive clause of this nature. Wording will read: "Applications for licences will need to justify the hours requested in terms of the purpose of the function or event."
Off-licences: Hours of operation from 7am on any day to 11pm the same day	**Proposed options for hours of operation:** **Option 1: Status Quo** **from 7am on any day to 11pm the same day** **Option 2: Set new hours** **Opening: 7am, 8am or 9am** **Closing: 9pm, 10pm, or 11pm**	The default trading hours provided for in the Act were accepted in the current LAP. There is a national trend towards reducing trading hours for off-licences. This is to support the intent of the act, which is to minimise harm from alcohol. The draft LAP provides options for the community to consider either status quo or a change to trading hours. The change may result in a mix of current and new opening/closing times.
Club licences	No change	
Special licences	No change	
Discretionary Conditions		
Premises layout/ design	No change	
Staffing	No change	
Host responsibility	No change	
Amenity, good order	No change	

Management of incidents	No change	
CPTED principles	No change	
Proposed new condition – restriction on glass containers	**An additional discretionary condition has been proposed:** **"For special licences, the Committee may impose restrictions on the use of glass containers."**	Staff have found many LAPs are including restriction on glass vessels at special events. The District Licensing Committee does not have to apply discretionary conditions to special licences; this allows the Committee to at least consider restricting glass vessels.
Timeframe for review		
Every six years	**A four year review period has been recommended.**	The recommended change allows for any concerns to be addressed at an earlier stage, and ensures the review cycle of this policy is outside of election timeframes
Style and format		
Overall format and style has changed to be consistent with SDC's other policy documents.		
The current LAP requires consultation with Primary Health South regarding monitoring statistics of education outcomes and an outline of community issues.	**It is recommended Primary Health South is removed from required consultation stakeholders**	Primary Health South has been replaced by WellSouth and no longer provide any education programmes relating to alcohol. They do no specifically collect alcohol-related data. For the current review, this information was source from Te Whatu Ora Health NZ and the Medical Officer of Health.

4. The reasons for the proposal

The main reasons for this proposal are to:

- seek feedback on the policy approach from the community
- meet the requirements of act (section 95 and section 97)
- where appropriate, update the policies and refine wording/formatting

5. How to have your say

Anyone can make a submission online at Make It Stick.

Submissions will be accepted from 9am 3 November and must be received by 5pm on 5 December 2025.

All submissions should state:

- the submitter's name
- the submitter's contact details
- whether or not the submitter would like to speak to Council about this matter.

If you need help submitting please contact Southland District Council at 0800 732 732, or call in to one of either Southland District or Invercargill City Councils' offices. All written submissions will be acknowledged and made available to the public.

As part of the consultation process, Council will be giving notice of this proposal to special interest groups and Te Ao Marama, to inform them of the public submission period.
At the close of submissions, Council will hear those wishing to be heard in support of their submissions. These hearings will take place at Southland District Council Chambers in Invercargill, in February 2026. These meetings are open to the public.

If you indicate you would like to be heard, staff will get in touch with you to arrange a time for you to speak at the hearing. You are able to join via an online link if you wish to be heard but are unable to make it to Chambers. If at the hearing you have any requirements, such as that you would like to speak via video conference or you would like to use sign language, please let us know.

6. Timetable for consultation

The dates below outline the timetable for the consultation process. Any changes to these dates will be publicly advised on Councils' Facebook pages and websites.

Date	Activity
10 September 2025	Council adopts the proposal for consultation
November 2025	Consultation period begins (9am)
December 2025	Consultation period ends (5pm)
February 2026	Hearings (dates to be confirmed in 2026) Deliberation by Council
March 2026	Draft policy adopted / 30 day period notified
April/May	Policy becomes operative

7. Options

Council has two possible options on how it could proceed. These are to:

- option 1 – adopt the draft policy, or
- option 2 – adopt an amended policy

The advantages and disadvantages of these options are outlined below.

Option 1 – adopt the draft policy

Advantages	*Disadvantages*
• is consistent with the previous approach taken by councils • is part of a process that aims to assist in improving the overall health and wellbeing of our communities	• an amended policy may better reflect community/stakeholder views • a LAP results in more monitoring and reporting. As it is not compulsory, it could be viewed as an additional administrative burden, with a financial cost attached

Option 2 – adopt an amended policy

Advantages	*Disadvantages*
• an amended policy may better reflect community/stakeholder views	• a significant change in approach may be confusing to both the public and the people who run alcohol licensed premises • may require further consultation if significant changes are proposed

Research report – Local Alcohol Policy

Combined Local Alcohol Policy Review 2025

Purpose

This report identifies key trends in relation to alcohol, and the harm it causes in Southland. This report informs the options proposed during the review of the local alcohol policy.

Some information referenced in this report is provided in attachments to the Council report. These will be identified in the body of text.

Fast Facts

- Of all the drugs available in society, alcohol is the most harmful drug when considered in relation to its widespread harm to the user and to others. Alcohol-related harms are vast, immediate and long term, occur across the levels of consumption, and result in substantial health, social and economic costs. Much of the harm is shouldered by local communities in the form of crime, loss of safety and reduced amenity.[1]
- The cost of alcohol-related harm in Aotearoa has been estimated at over $9.1 billion annually[2][3]. The harms are far-reaching and deeply felt by many families/whanau and communities particularly in areas of high deprivation.
- Alcohol is a component cause for more than 200 disease and injury conditions[4], and is the leading behavioural risk factor for death and disability adjusted life years lost among New Zealanders aged 15 to 49 years[5].
- In New Zealand, over 75% of all the alcohol consumed comes from off-licensed premises, and 72% of drinking occasions among high-risk drinkers occur outside of on-licences[6]
- It is often cheaper to buy alcohol from an off-licence than an on-licence, and alcohol bought from an off-licence is more likely to be consumed in environments which lack control or supervision. New Zealand research has found that people who purchase alcohol from off-licences after 10.00 pm are approximately twice as likely to be heavier drinkers.[7]
- Studies have estimated that more limited off-licence trading hours and reduced density of off-licence premises could lead to a 17.9% reduction in alcohol consumption in New Zealand, resulting in a gain of 450,000 health-adjusted life years over the lifetime of the current population.[8]

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[1] Alcohol Healthwatch. (2024). A guide to inform Local Alcohol Policy development. Auckland. New Zealand: Alcohol Healthwatch.

[2] The total societal cost of alcohol harms in 2023 is approximately $9.1 billion based on the increased risk of morbidity and mortality, with over half ($4.8 billion) due to fetal alcohol spectrum disorder (FASD). New Zealand Institute of Economic Research (NZIER). Cost of alcohol harms in New Zealand: Updating the evidence with recent research (2024).

[3] Environmental Health Intelligence New Zealand. Alcohol-related harm indicators

[4] Rehm J, Baliunas D, Borges GL, *et al.* The relation between different dimensions of alcohol consumption and burden of disease: an overview. *Addiction* 2010; **105**: 817–43.

[5] Institute for Health Metrics and Evaluation (IHME). GBD Compare Data Visualization 2019. New Zealand. Seattle: WA: University of Washington, 2022.

[6] Market Economics Limited (M.E. Consulting). New Zealand Alcohol Supply and Demand Structures: Research report. Wellington: Health Promotion Agency, 2018

[7] Casswell et al, International alcohol control study: pricing data and hours of purchase predict heavier drinking. Alcoholism: Clinical and Experimental Research. 2014. 38(5):1425-31

[8] Chambers T et al, The estimated health impact of alcohol interventions in New Zealand: a modelling study. Addiction. 2023.

- National and international research has found an association between extended on-licence trading hours and increases in assaults, unintentional injury and drink driving offences, while reduced trading hours tend to lead to decreased incidents of assault and hospitalisation.[9] [10]
- Exposure to alcohol advertising normalises alcohol consumption, and younger people are particularly susceptible to advertising influences. In New Zealand, research has found that children aged 11-13 were exposed to alcohol marketing 4.5 times per day on average, with Māori and Pacific children being exposed five and three times more than European children.[11]
- Every year in New Zealand it is estimated that 4% of the total adult population aged 16 and over experience alcohol abuse or dependence. This comprises more than 100,000 New Zealanders.[12]
- Studies in relation to the effects of the proximity of licensed premises on persons utilising alcohol treatment facilities, found that among patients who were diagnosed with co-morbid mental health and substance use disorders, close proximity of two or more bottle and/or beer stores was associated with a reduction in the likelihood of continuity of treatment[13].[14]

Licence information

Licence Information – Controlled Purchase Operations (CPOs)
NZ Police have carried out a number of Controlled Purchase Operations (CPOs) since the current LAP has been operative. For the Invercargill City district, 22 premises have been checked and 2 CPOs conducted. Both of these CPOs were passed, with no need for enforcement actions.

However, CPOs in the Gore and Southland districts over the same period resulted in 4 failures by off-licences, leading to a 28-day suspension of Managers Certificate in three cases, and the 48-hour suspension of Off Licence in another. This divergence between the districts could suggest differing issues arising in these areas, which would tend to support the development of a single policy for each territorial authority.

Licence information – Licensed Hours for Licensed Premises
These vary between each premises. Environmental Health were unable to provide a list of hours for this report.

Off-Licence Density
This information is provided in full as **Attachment E** in the Council report.

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[9] Connor J et al, Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data. Addiction. 2021;116(4):788-98.
[10] Nepal S et al, Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review. Journal of Studies on Alcohol and Drugs. 2020;81(1):5-23.
[11] Chambers T et al, Quantifying the Nature and Extent of Children's Real-time Exposure to Alcohol Marketing in Their Everyday Lives Using Wearable Cameras: Children's Exposure via a Range of Media in a Range of Key Places. Alcohol and Alcoholism, Volume 54, Issue 5, September 2018, Pages 626-633.
[12] Oakley Browne, M.A., Wells, J.E., Scott, K.M. (eds). *Te rau Hinengaro:The New Zealand Mental Health Survey* [Internet]. Wellington: Ministry of Health; 2006.
[13] Stahler GJ, Mazzella S, Mennis J, Chakravorty S, Rengert G, Spiga R. The effect of individual, program, and neighborhood variables on continuity of treatment among dually diagnosed individuals [Internet]. *Drug and Alcohol Dependence*. 2007;87(1):54-62.
[14] Stahler GJ, Mennis J, Cotlar R, Baron DA. The influence of neighborhood environment on treatment continuity and rehospitalization in dually diagnosed patients discharged from acute inpatient care [Internet]. *American Journal of Psychiatry*. 2009;166(11):1258-68.

Southland District Licensed Venues (29 May 2025 – ARLA Licence register)

Licence	Number	Description
Off-licensed premises (32 total)	1	Bottle store
	1	Caterer endorsed
	6	Grocery Stores
	6	Hotels
	1	Mail order
	6	Other (bar, dairy, distillery, hotel, supermarket)
	1	Sports Club
	3	Supermarkets
	7	Taverns
On-licensed premises (84 total)	1	Caterer endorsed
	14	Conveyances
	13	Hotels
	8	Other (bar, conveyance, distillery, tavern)
	25	Restaurants
	15	Taverns
	8	Tourist Houses
Club licenses (43 total)	37	Sports clubs
	3	Country clubs
	1	Cultural club
	1	Chartered club
	1	Other
TOTAL LICENCES	**159**	**All types of licence**

Objectives and policies of the district plan

The following provisions of the district plan are relevant to licensed premises:

Section 3 – Zone objectives, policies, rules and methods

HERITAGE – Section 2.5 Policy HH.2 – Provides for 'adaptive re-use' and redevelopment of historic heritage. Relevant because licensed premises such as restaurants and bars can be a successful way of achieving adaptive re-use of heritage buildings.

SIGNAGE – Section 2.12 – The signage rules control the size and location of signage but not what can be written on the sign. Hoardings are however deemed to be 'inappropriate'.

RESIDENTIAL ZONE – Section 3.2 – Policy URB.2 – Encourage the implementation of best practice urban design principles – advocated to 'enhance identity and amenity values, promote diversity, choice, innovation and sustainability, and ensure vibrant and cohesive urban areas'. Application will be specific to the project.

URBAN ZONE – Section 3.2 – Rule URB.1 – within the 'commercial precinct' commercial and entertainment activities and visitor accommodation are permitted activities.

Also at Rule URB.1 – Temporary events are permitted activities.

Under Rule URB.3 – Otherwise all licensed premises within the Urban Zone would be discretionary activities.

Any areas in which bylaws prohibiting alcohol in public places are in force

Council has a bylaw in force prohibiting alcohol in public places. These liquor or alcohol ban areas were introduced in response to requests by police and also property owners in the affected areas. The objectives of the bylaws is to assist in:

- protecting the public from nuisance
- protecting, promoting and maintain public health and safety
- minimising the potential for offensive behaviour in public places.

SDC adopted an Alcohol Control Bylaw in November 2022. The bylaw applies to public places identified by resolution as an Alcohol Free Area , demonstrated in the image below:

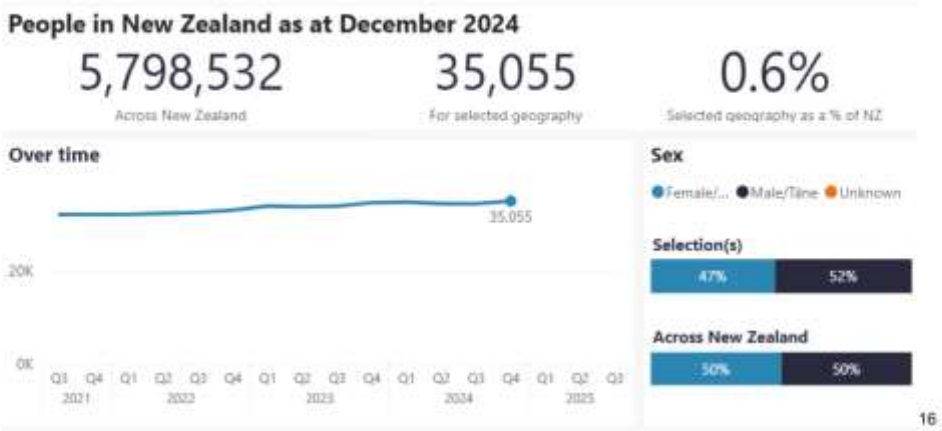
Demographics

Southland District Demographic information

A key feature of the LAP District's population is its relatively slow overall growth. Figures from the 2023 Census, indicate an ongoing trend in the ageing of the LAP District's population with a notable increase in people aged 45 years and above.

Southland district population projections (medium projection), by age and sex, 2018(base)-2048[15]

	Year	2018	2023	2028	2033	2038	2043	2048
Age (years)	0-14	6,600	6,500	6,200	5,900	5,700	5,600	5,600
	15-39	9,700	9,800	9,800	9,600	9,300	9,100	8,800
	40-64	10,800	10,800	10,600	10,700	10,700	10,700	10,800
	65 +	4,700	6,000	7,300	8,200	8,900	9,300	9,400



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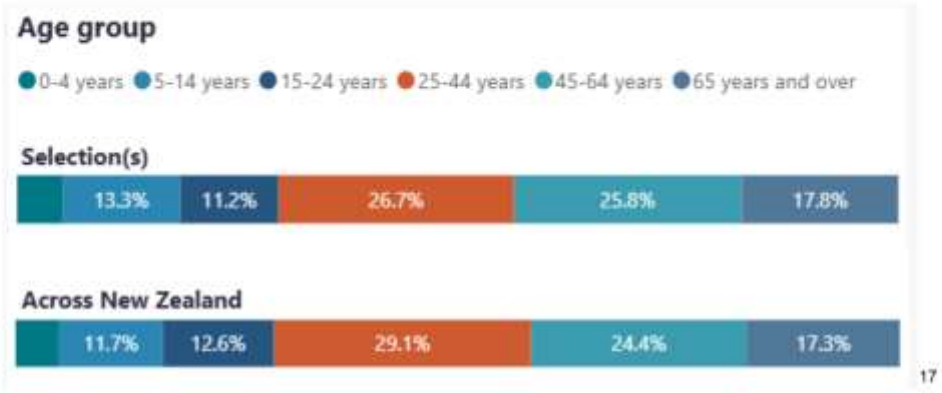
Southland District population by age group



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- the median age is 40.4 years for people in Southland as a whole. For New Zealand as a whole, the median age is 38.0 years
- 17.8 percent of people in Southland District aged 65 years and over, compared with 17.3 percent of the total New Zealand population

[15] Statistics New Zealand Statistical area 2 population projections, by age and sex, 2018(base)-2048
[16] Social Investment Agency Regional Data Explorer
[17] Social Investment Agency Regional Data Explorer

- 18.48% of people are aged under 15 years in Southland District, compared with 16.64% for all of New Zealand.

Tourists and holidaymakers

Although large volumes of tourists visit Milford Sound each year, tourists are more likely to pass through the District than stay for extended periods. The wider Southland region hosted an average of 46,000 guest nights per month in the year to 1 May 2025.[18]

Around two thirds of guest nights in Southland are for domestic travellers. Over this period, domestic travellers spent an average of $22.2 million per month in the Southland region, and international travellers an average of $3.1 million.

Tourism New Zealand has an online tool[19] which provides indicative visitors profiles for the types of domestic visitors who are interested in visiting Southland.

Based on this, domestic visitors are most likely to be adults travelling without children (73%), from a household consisting of a couple with no kids (45%), more likely to be female than male (52% to 48%), usually younger between 18-34 (31%), and usually travelling by road rather than air (58% to 42%).

Visitor spending data indicates that around a third of domestic visitor spending is made by visitors from Otago, 29% from Southlanders, and 16% by visitors from Canterbury.[20]

For international visitors, based on data for overall international visitors to New Zealand, most are likely to come from Australia (44%). Australian visitors tend to be younger (35% are aged 25-44) and are roughly evenly split male and female (49% to 51%).[21]

Harm and Health

Ministry of Health's Annual Health Survey includes questions around alcohol use. This data is for all of New Zealand and is unable to be viewed at SA2 levels. The results from the 2023/24 survey found[22]:

Past year drinkers (those who have had a drink of alcohol in the past year)

- In 2023/24, four in every five adults (76.0%) drank alcohol in the past year, a decrease since 2019/20 (81.6%).
- Although the legal age for purchasing alcohol in New Zealand is 18 years old, 51.0% of those aged 15–17 years drank alcohol in the past year.
- Men were 1.1 times as likely to have been past-year drinkers than women, after adjusting for age.
- Pacific and Asian adults were less likely to have had alcohol in the past year than non-Pacific and non-Asian adults, after adjusting for age and gender.
- After adjusting for age, gender, and ethnic group, those in the most socioeconomically deprived areas were less likely to have consumed alcohol in the past year than those living in the least deprived areas.
- Disabled adults were less likely to have drunk alcohol in the past year than non-disabled adults, after adjusting for age and gender. The rates were 66.5% and 76.9%, respectively.

Hazardous drinking

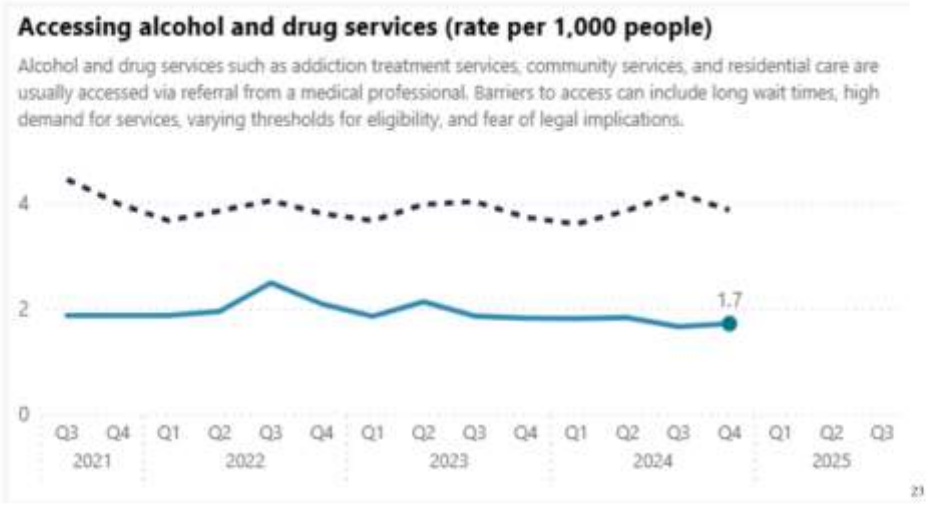
[18] Tourism New Zealand
[19] Tourism New Zealand Domestic Growth Insight Tool (DgiT)
[20] Based on Tourism Electronic Card Transactions published by Tourism Evidence and Insights Centre, MBIE, sourced from Data Insights Southland Hub (DISH)
[21] Tourism New Zealand, Markets Overview
[22] Ministry of Health. 2024 New Zealand Health Survey Annual Data Explorer

Hazardous drinking (aged 15+ years) is measured using the 10-question Alcohol Use Disorders Identification Test (AUDIT) developed by the World Health Organization (Babor et al 2001). The AUDIT is a 10-item questionnaire that covers three aspects of alcohol use: alcohol consumption, dependence and adverse consequences. An AUDIT score is the total of the scores obtained for each of the 10 items.

Hazardous drinkers are those who obtain an AUDIT score of 8 or more, representing an established pattern of drinking that carries a high risk of future damage to physical or mental health.

- In 2023/24, the highest prevalence of hazardous drinking was among those aged 18–24 years, at 22.6%. The prevalence of hazardous drinking was also high in those aged 25–34 (21.1%), 35–44 (18.3%) and 45–54 (22.1%).
- The rate of hazardous drinking was 16.6%, which is equivalent to about 720,000 adults. This is similar to last year (16.0%), but down from 20.4% in 2018/19.
- The largest decrease in hazardous drinking over the last five years was among young people 18–24 years (from 35.8% to 22.6%).
- The prevalence of hazardous drinking was 22.2% among men and 11.2% among women. Men were 2.0 times more likely to be hazardous drinkers than women, after adjusting for age.
- Asian adults (5.7%) had the lowest rate of hazardous drinking compared to other ethnic groups: Māori (29.6%), Pacific (16.2%) and European/Other (17.9%).
- One in 12 adults (8.2%) reported drinking six or more drinks on one occasion at least weekly. This is a decrease since 2018/19, when the rate was 12.3%.

Southland District rate of accessing alcohol and drug services, 2021-2025



Southland District (solid blue line) has a sustained lower rate of accessing alcohol and drug services than the New Zealand overall rate.

This may be indicative of a lower need or could be instead attributed to a higher level of barriers to access with fewer services being available in Southland.

[23] Social Investment Agency Regional Data Explorer

The overall health indicators of the district's residents

Life expectancy at birth[24]

Life expectancy in Southland District is slightly higher than the New Zealand averages for both males and females, at 82.1 and 85.6 respectively. This is compared to 80.0 and 83.5 nationally (male and female). Life expectancy for Māori in the Southland region is lower, at 77.0 for males and 80.6 for females.

Self-rated health[25]

The most recent available New Zealand Health Survey data for the Southland region indicates that the proportion of adults reporting self-rated health as good, very good or excellent, has improved slightly over the life of the current LAP, moving from 84.6% to 87.9%[26]. For Māori in Southland, the proportion has also increased, although it remains lower than the wider Southland average at 83.7%[27]. This extract is provided in full as **Attachment D** of the Council report.

Cardiovascular Health[28]

The table below shows the prevalence of various indicators of cardiovascular disease amongst adults (aged 15 years or over) for 2023/24 within the Southland region, compared to Te Waipounamu South Island and nationally.

Prevalence of cardiovascular disease 2023/24

Indicator	*Prevalence – Southland*	*Prevalence – Te Waipounamu*	*Prevalence - National*
Stroke	1.5%	1.8%	2%
Heart failure	1.8%	3.1%	2.5%
High blood pressure	22.1%	18.8%	17.7%
High cholesterol	13.1%	11%	11.3%
Ischemic heart disease	7.3%	5%	4.5%

For Māori, data is available to compare prevalence within Te Waipounamu South Island and shows overall indicators of cardiovascular health tend to be similar or slightly lower for Māori.

Prevalence of cardiovascular disease for Māori 2023/24

Indicator	*Prevalence – Māori Te Waipounamu*	*Prevalence – total population Te Waipounamu*	*Prevalence – Māori Nationally*
Stroke	1.9%	1.8%	2.2%
Heart failure	3.1%	3.1%	2.8%
High blood pressure	16%	18.8%	15.1%
High cholesterol	9.4%	11%	9.6%
Ischemic heart disease	5%	5%	4.8%

[24] Statistics New Zealand
[25] Ministry of Health. 2024 New Zealand Health Survey Annual Data Explorer
[26] New Zealand Health Survey Regional Data Release 2011/12-2023/24, three year rolling average for period ending 2019/2020 and period ending 2023/24, Adult Unadjusted Statistics
[27] Period ending 2023/24
[28] 36 New Zealand Health Survey Regional Data Release 2011/12-2023/24, three year rolling average for period ending 2019/2020 and period ending 2023/24, Adult Unadjusted Statistics

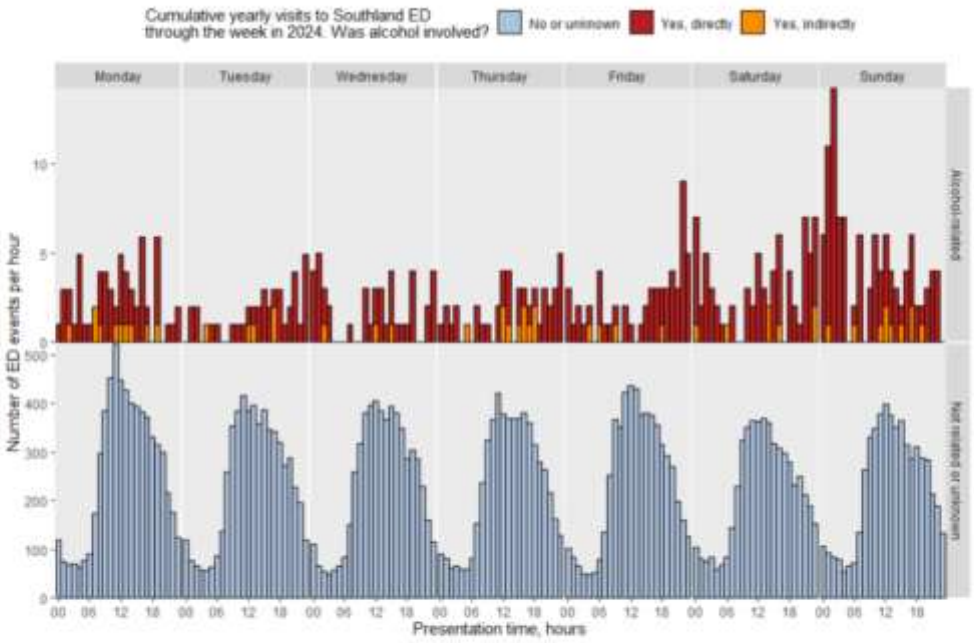
Alcohol Consumption[29]

Approximately 81% of adult Southlanders (compared to 76% nationally) will have had an alcoholic drink in the past year. 23% of Southlanders (18% nationally) will drink six or more standard drinks on one occasion at least monthly, and 14% (9%) will do so at least weekly – the highest of any region. 19.5% of Southlanders are identified as having a hazardous drinking pattern, compared to 17.1% nationally.

The Nature and Severity of the Alcohol-related Problems Arising in the District

Alcohol-related Presentations to the Emergency Department Data was provided by Te Whatu Ora, NPHS Intelligence Directorate, on Alcohol-related Emergency Department presentations to Southland Hospital in 2024.

Distribution of yearly visits (uncorrected) by time of the day and day of the week



Alcohol-related presentations to the Emergency Department (ED) in Southland Hospital increase notably toward the weekend, with the highest average between 9.00 pm Saturday to 4.00 am Sunday, and a particular spike is evident between 1.00 am and 3.00 am Sunday morning.

Total and alcohol-related ED presentation

	2018	2019	2020	2021	2022	2023	2024
Alcohol-related (corrected*)	832	810	779	859	642	610	794
Visits for acute alcohol consumption	74	76	81	71	68	63	97
Total ED presentations (all causes)	38,652	39,517	36,596	39,013	36,702	36,891	40,391

*Factoring in estimated undercounting

[29] New Zealand Health Survey Regional Data Release 2011/12-2023/24, three year rolling average for period ending 2019/2020 and period ending 2023/24, Adult Unadjusted Statistics. See also Southland Region alcohol data extract from New Zealand Health Survey, 28 July 2025 (Appendix 11)

Alcohol-related ED presentations in 2024 by age group and gender

Age group	Female/Male	Total Count	% of all-cause ED visits	% of alcohol-related visits
< 15	2/3	5	0.1%	1.2%
15-24	39/68	107	2.0%	25.1%
25-34	23/53	76	1.4%	17.8%
35-44	31/43	74	1.6%	17.3%
45-54	18/38	56	1.5%	13.1%
55-64	15/38	53	1.2%	12.4%
65-74	5/22	27	0.6%	6.3%
75+	9/20	29	0.5%	6.8%

The highest numbers of alcohol-related ED presentations are consistently seen in the 15-24 age group, and in males more frequently than females.

This data is provided in full as **Attachment F** to the Council report.

Police Recorded Alcohol-Related Harm

New Zealand Police provided comprehensive data from the National Alcohol Harm Viewer (NAHV), which contains the previous five years rolling data extracted from the Police National Intelligence Application (NIA).

NIA records occurrences that Police respond to, and these are coded. Since August 2019, all offences, infringements, incidents and some tasks must indicate if alcohol was a contributing factor (ACF). There are some potential recording issues with this ACF flag, though work continues on its quality assurance. The NAHV uses ACF data and a specific set of alcohol-related codes (relating to drink driving and alcohol ban breaches) in occurrences.

It should also be noted that the heat maps and data tables provided include all alcohol-harm, not just crime. Further, the heat maps do not include harm where the scene type is residential, for privacy reasons.

There are various limitations to the data, however overall it provides an indication of alcohol-related harm as recorded by Police.

The request asked for information from 1 July 2020 to 31 May 2025, for specific locations (within a 5km radius of the centremost point of township/area) and for the entire district:

a. NZ Deprivation Index 2023 levels mapped, with alcohol ban areas
b. NZ CHI mapped (both total sum and sum by population)
c. Recorded total alcohol harm
d. Alcohol harm in outdoor public places
e. Drink driving related offences
f. Alcohol related family harm
g. Alcohol ban breaches (for Te Anau specifically)

Points d) to f) each:

- Heat mapped (please provide a table by statistical area 2 in lieu of a map for family harm)
- By calendar year (in tables):
  - By category
  - Over time (month/year)
  - By day of the week

- By time of day
- By NZ Deprivation Index 2023 level
- By scene type (total alcohol harm, and alcohol related family harm only)

The data is provided in full as **Attachment H** to the Council report. A summary is provided below.

Police recorded alcohol harm across Southland District, June 2020-2025 (total)

The following table provides the total number of incidents from June 2020-25, for each locality requested in Southland District. These localities were chosen for proximity to licences premises and to obtain a general spread across the entire district. It is noted that the Milford Sound area was not chosen, however there are minimal incidents that have been recorded over the last five years.

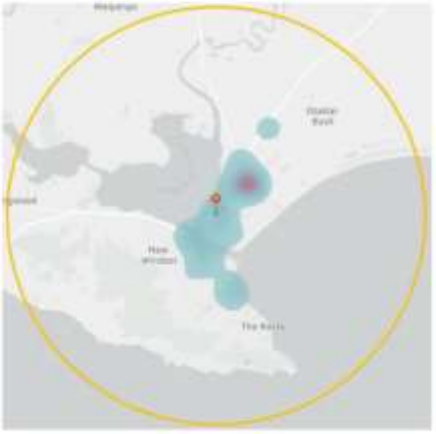
Some localities have been grouped due to overlying deprivation index levels and place-based population reasons (being unable to obtain exact population numbers).

Police recorded alcohol harm across Southland District, June 2020-2025 (total)

Locality (By Licence)	Population (2024 estimate)	NZ Deprivation Index 2023 level	Recorded total alcohol harm	Alcohol harm in outdoor public places	Drink driving related offences	Alcohol related family harm
Edendale	2450	5	120	58	40	47
Woodlands			41	13	9	20
Kennington	-	2	177	67	42	54
Lumsden	1360 *(inc Balfour)*	5	46	21	12	7
Nightcaps/Ōhai	1620	8	79	36	25	33
Ōtautau	2970	6	96	49	27	39
Rakiura/Stewart Island	490	6	27	6	8	10
Riversdale	1480	3	78	36	20	30
Riverton/Aparima	1680	7	209	123	76	59
Te Anau	2910	4	267	135	75	68
Manapōuri	-	4	21	7	2	9
Tokanui	-	6	19	11	7	6
Tuatapere	2073 *(total Longwood Forest)*	7	99	26	13	51
Ōrepuki			32	9	3	19
Wallacetown	1200	4	163	96	56	34
Winton	2250	5	299	167	103	84
Wyndham	2260 *(inc Catlins)*	6	92	33	20	35
Southland District	**33,300**		**2390**	**1188**	**684**	**826**

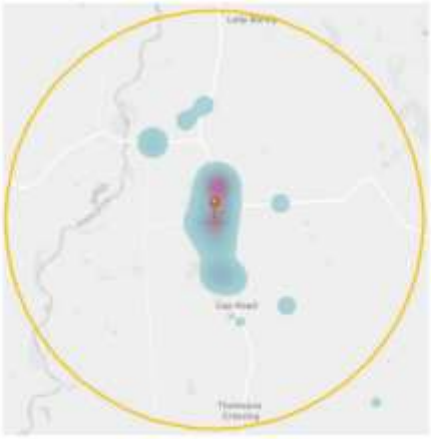
Three of the locality maps displayed a minor "hotspot" of alcohol harm (noting these maps do not include family harm numbers for privacy reasons). However, these were minimal when compared with the trends seen across Invercargill City, with a greater concentration of harm happening in the central business district, and more apparent "hotspots".

Police recorded alcohol related harm in Riverton/Aparima (June 2020-2025)

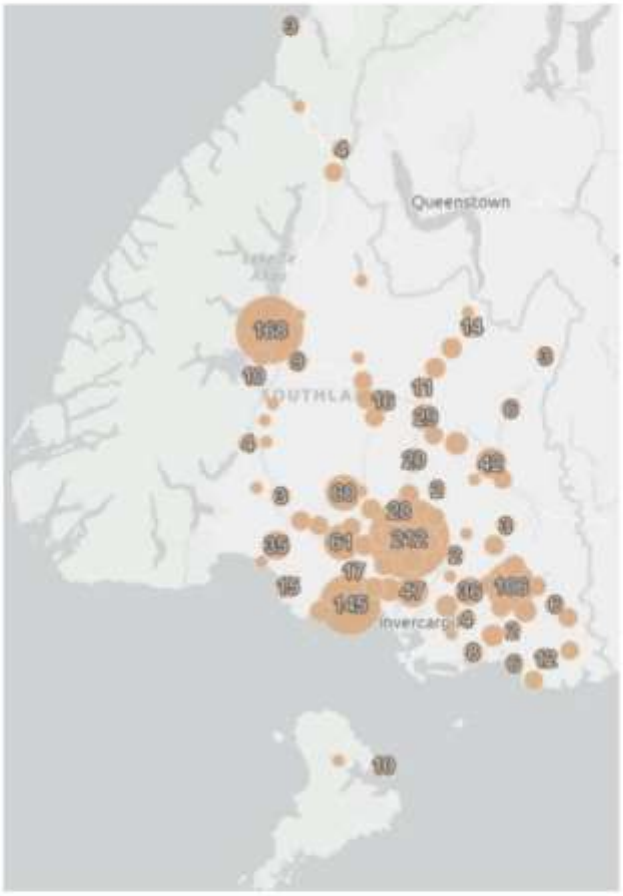


Police recorded alcohol related harm in Te Anau (June 2020-2025)

Police recorded alcohol related harm in Winton (June 2020-2025)



All of Southland District - Police recorded alcohol harm June 2020-2025



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the total count.

A greater number of harm related incidences occur in more highly populated areas or in areas with a higher number of licensed premises.

It should be noted that in early engagement, feedback from New Zealand Police stated their view is that the current LAP is fit for purpose.

Police also stated they would not dispute or discourage and topics being submitted by the other reporting agencies.

District Licensing Committee feedback

Feedback from the Committee includes:

- the LAP and the bylaw are sufficient for most, easy to read /digest by most quickly
- nothing seen/heard in this triennium points to a need for more detail
- there were options we could have included, when the policy was formed, such the one way door whereby people who left an establishment were refused readmission or service would cease for a period each hour for a certain time. These weren't seen as being helpful.
- SDC have a later off licence provision of 11pm instead of 10pm which was partly because of submissions to do with rural contractors in summer.

Health New Zealand
Te Whatu Ora

Southland Region alcohol data extract from New Zealand Health Survey

28/07/2025

Requested by: Jo Grimwood, Team Lead Community & Whanau Wellbeing & Health (RT-1762) Promotion Advisor
Completed by: NPHS Intelligence Directorate
Purpose: alcohol-related data in NZHS specific to Southland Region
Data: New Zealand Health Survey – 2025 regional data release.
Limitations: To compensate for small sample sizes for some regions, each statistic is calculated by pooling three consecutive Health Survey cycles, so the reported values represent an 'average' year across that three-year window. This method provides a continuous view of trends over time, but single-year regional data are unavailable.

Introduction

This report is based on the New Zealand Health Survey regional data of alcohol-related behaviours, comparing Southland Region with Otago Region, all other regions and New Zealand as a whole. The dataset on age-adjusted adult prevalences is extracted from https://github.com/minhealthnz/regional-data-release

The following indicators are explored:

- Past-year drinkers (had an alcoholic drink in the past 12 months) available from 2011/12 to present,
- Hazardous drinking pattern defined as an AUDIT[1] score of 8 or higher, among the total population available from 2016/17 to present,
- Drink 6 or more alcoholic drinks on one occasion - at least monthly (total population) available from 2016/17 to present,
- Drink 6 or more alcoholic drinks on one occasion - at least weekly (total population) available from 2016/17 to present.

[1] AUDIT: the Alcohol Use Disorders Identification Test : guidelines for use in primary health care, 2021. WHO Reference Number: WHO/MSD/MSB/01.6a

Region rankings and prevalences

The prevalence of selected alcohol-related behaviours in the Southland Region is consistently level with or worse than that of New Zealand as a whole (Table 1; Figures 1 and 2). In particular, in pooled survey years 2021/22 – 2023/24 Southland Region ranked in the 20% of the regions with the highest prevalence of past-year drinking, heavy episodic drinking at least monthly and heavy episodic drinking at least weekly.

Table 1. Proportion of total population affected by selected alcohol-related behaviours in Southland Region and whole of New Zealand; ranking of the Southland Region compared to other regions (1 – best, 14 – worst among regions).

Pooled survey years	Southland Region ranking	Proportion of total population in Southland Region (95% CI)	Proportion of total population for whole NZ (95% CI)
Past-year drinkers (total population)			
2016/17 – 2018-19	11	0.85 (0.81 – 0.88)	0.80 (0.79 – 0.81)
2017/18 – 2019/20	13	0.86 (0.83 – 0.89)	0.81 (0.80 – 0.81)
2018/19 – 2020/21	14	0.86 (0.82 – 0.89)	0.80 (0.80 – 0.81)
2019/20 – 2021/22	6	0.80 (0.72 – 0.88)	0.80 (0.79 – 0.81)
2020/21 – 2022/23	7	0.82 (0.73 – 0.89)	0.78 (0.77 – 0.79)
2021/22 – 2023/24	13	0.83 (0.75 – 0.89)	0.77 (0.76 – 0.78)
Hazardous drinkers (total population)			
2016/17 – 2018-19	11	0.25 (0.21 – 0.3)	0.22 (0.21 – 0.22)
2017/18 – 2019/20	15	0.28 (0.24 – 0.32)	0.22 (0.21 – 0.23)
2018/19 – 2020/21	14	0.28 (0.23 – 0.32)	0.22 (0.21 – 0.23)
2019/20 – 2021/22	6	0.22 (0.15 – 0.29)	0.22 (0.20 – 0.23)
2020/21 – 2022/23	4	0.19 (0.13 – 0.30)	0.20 (0.19 – 0.21)
2021/22 – 2023/24	8	0.20 (0.13 – 0.30)	0.18 (0.17 – 0.19)
Heavy episodic drinking at least monthly (total population)			
2016/17 – 2018-19	16	0.31 (0.25 – 0.37)	0.24 (0.23 – 0.24)
2017/18 – 2019/20	16	0.33 (0.28 – 0.38)	0.24 (0.23 – 0.25)
2018/19 – 2020/21	16	0.36 (0.31 – 0.41)	0.24 (0.23 – 0.25)
2019/20 – 2021/22	16	0.30 (0.24 – 0.38)	0.23 (0.22 – 0.24)
2020/21 – 2022/23	15	0.26 (0.17 – 0.36)	0.21 (0.2 – 0.22)
2021/22 – 2023/24	14	0.24 (0.15 – 0.35)	0.20 (0.19 – 0.21)
Heavy episodic drinking at least weekly (total population)			
2016/17 – 2018-19	13	0.15 (0.10 – 0.22)	0.12 (0.12 – 0.13)

2017/18 – 2019/20	15	0.16 (0.12 – 0.20)	0.12 (0.12 – 0.13)
2018/19 – 2020/21	13	0.16 (0.12 – 0.20)	0.13 (0.12 – 0.14)
2019/20 – 2021/22	10	0.14 (0.09 – 0.19)	0.12 (0.11 – 0.13)
2020/21 – 2022/23	5	0.12 (0.06 – 0.20)	0.11 (0.10 – 0.12)
2021/22 – 2023/24	16	0.14 (0.08 – 0.22)	0.09 (0.09 – 0.10)

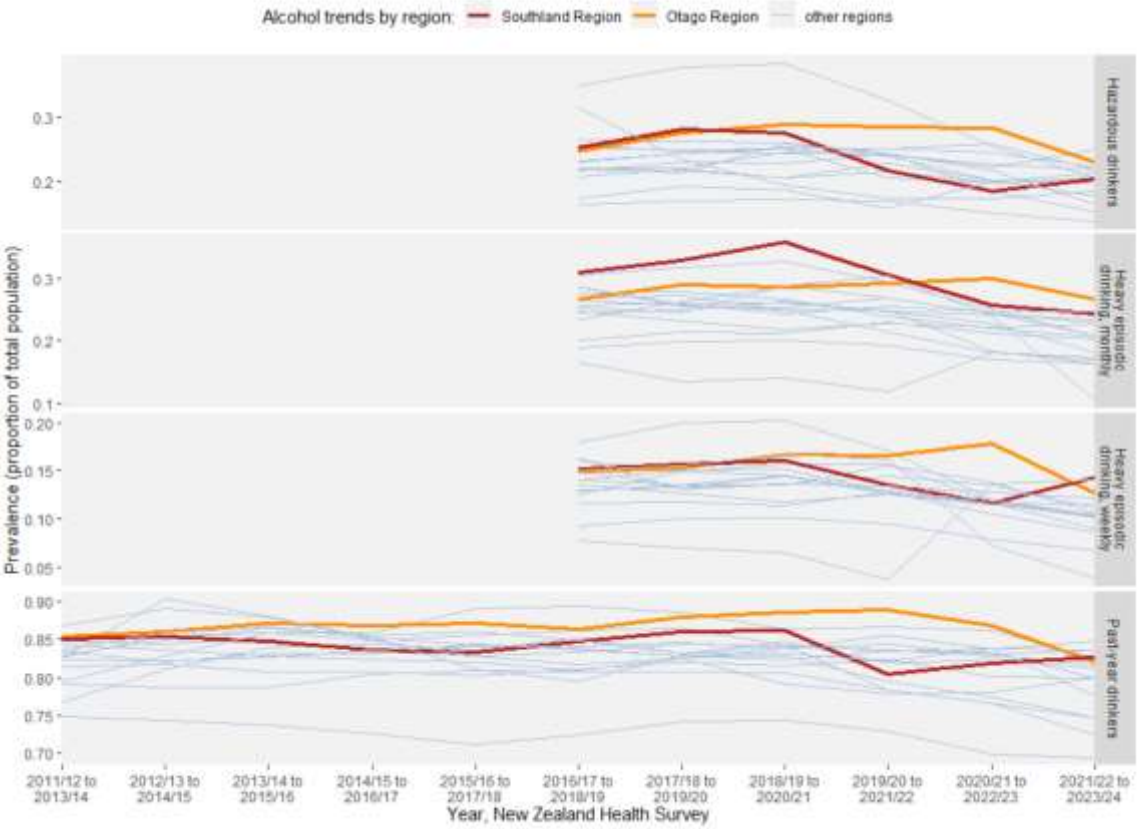


Figure 1. NZHS prevalence of alcohol-related behaviours among total population in Southland Region, Otago Region and all other regions.

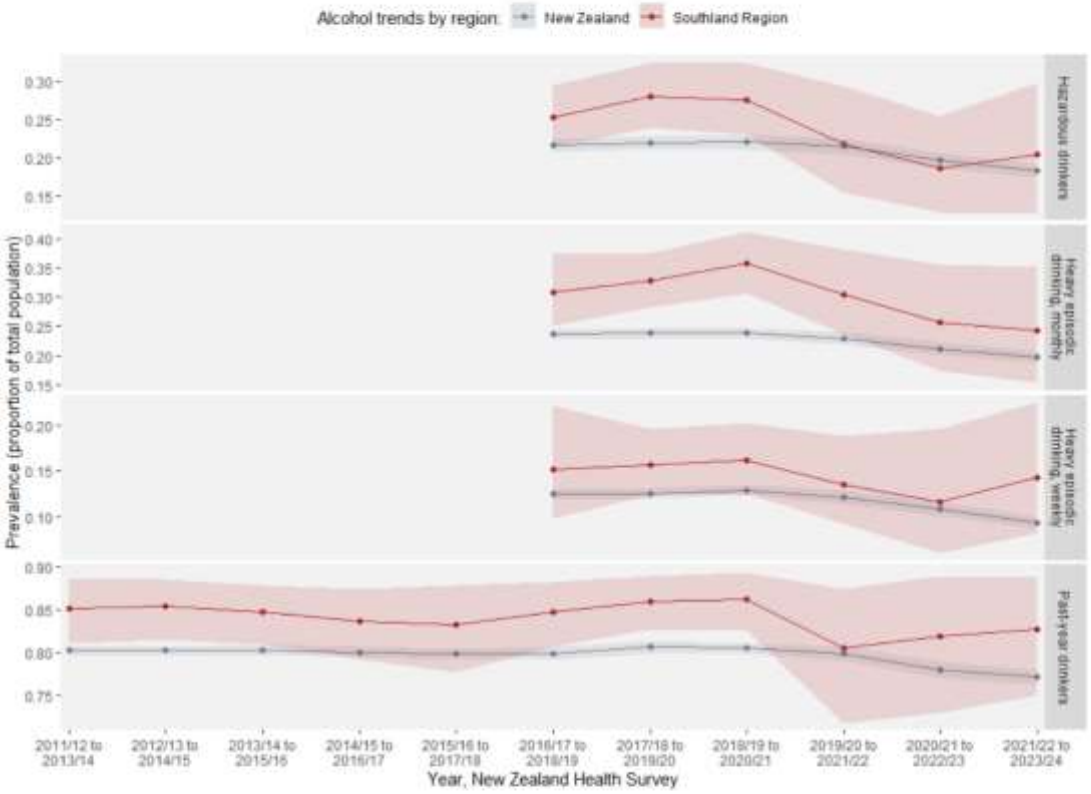


Figure 2. NZHS prevalence of alcohol-related behaviours among total population in Southland Region and New Zealand as a whole.

Health New Zealand
Te Whatu Ora

Density of selected off-licences in the Southland Region

Te Waipounamu, Southern District

22/07/2025

Requested by: Michael Butchard, MOoH
Completed by: NPHS Intelligence Directorate
Purpose: Inform future Southland Region LAP submissions
Data: Census 2023, Otago University NZDep 2023, ARLA register cross-checked and amended with local data on off-licences.
Limitations: none

Section 1

Off-licences used in the current analysis are based on the ARLA register (updated in May 2025), cross-referenced and supplemented by data collected locally by Southern District NPHS staff. The off-licences are classified in the following categories:

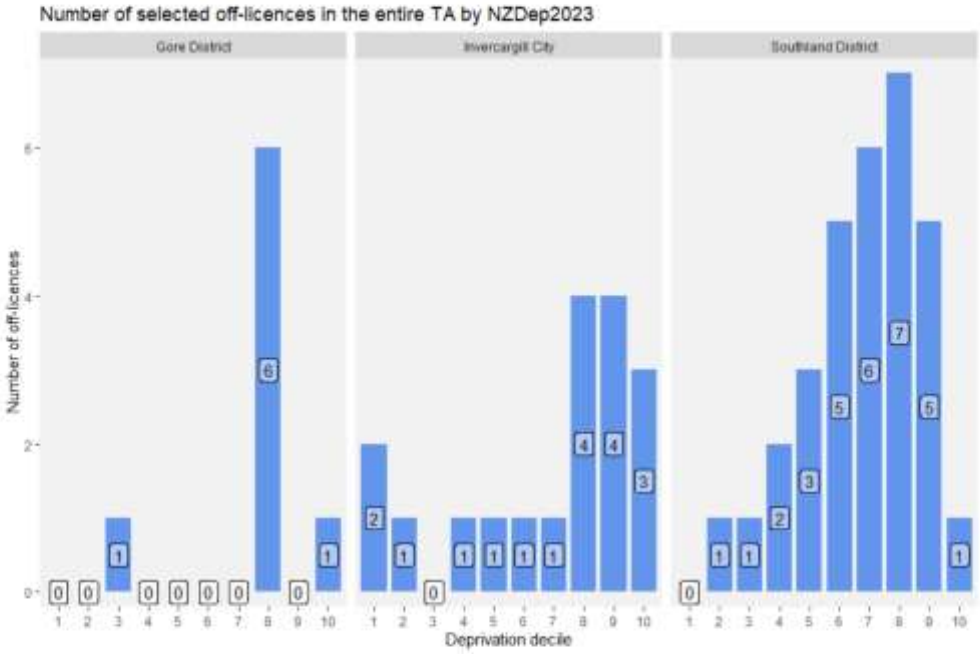
- Bottle store
- Tavern
- Supermarket
- Grocery
- Hotel
- Social club
- Mail order
- Distillery

The last two categories ("mail order" and "distillery") were excluded to ensure compatibility with the similar analysis used for Dunedin City LAP consultation.[1]

Currently there are eight off-licences of interest in Gore District, 18 in Invercargill City and 31 in the Southland District. The counts of selected of-licences by NZDep 2023 deciles are given in Figure 1.

[1] Off-licences in the *Mail order* category differ from other types in having no public-facing premise where alcohol is purchased in person; physical address of the mail order business has no relation to where alcohol is delivered. A single distillery (Bluff Distillery) in the Southland Region also operates in a unique way whereby the distillery is only open to the public through pre-booked paid tours, which differs markedly from all other types.

Figure 1. A count of selected off-licences in Gore District, Invercargill City and Southland District by NZDep2023 deprivation deciles (at SA1 level).

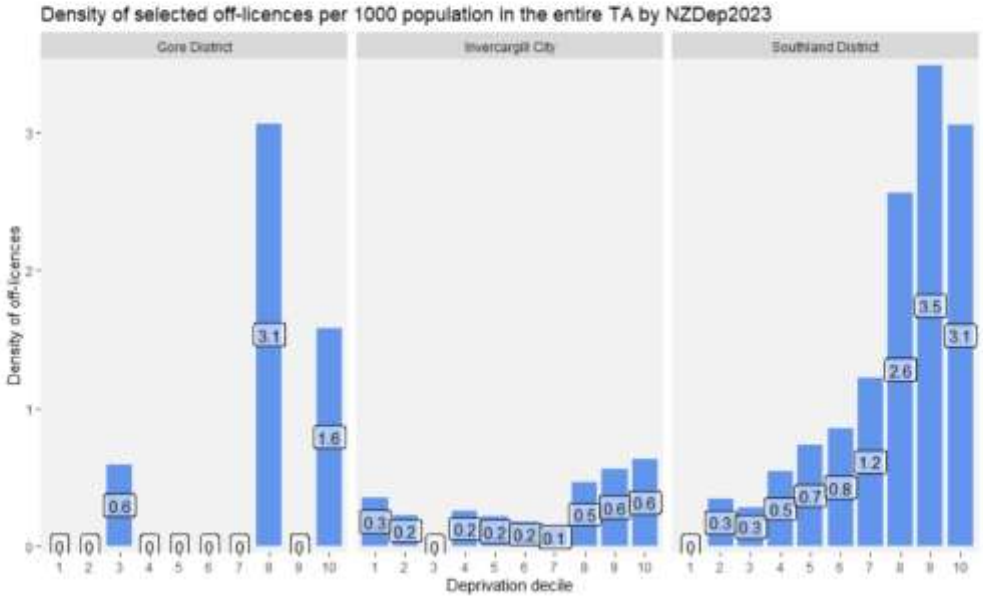


Current average density of selected off-licences is 0.5 stores per 1000 usually resident population in Gore District, 0.3 in Invercargill City and 1.2 in Southland District. Density distribution among NZDep2023 deciles is given in Figure 2.

The average off-licence density per 1000 population was consistently lower in areas with deprivation decile 1 to 6 compared to areas with deciles 7 – 10:

- 0.1 vs 1.4 in Gore District,
- 0.2 vs 0.4 in Invercargill City,
- 0.5 vs 2.0 in Southland District.

Figure 2. Density of selected off-licences in Gore District, Invercargill City and Southland District per 1000 usual residents by NZDep2023 deprivation deciles (at SA1 level).



Section 2

Figure 4. Southland Region population by NZDep23 deciles

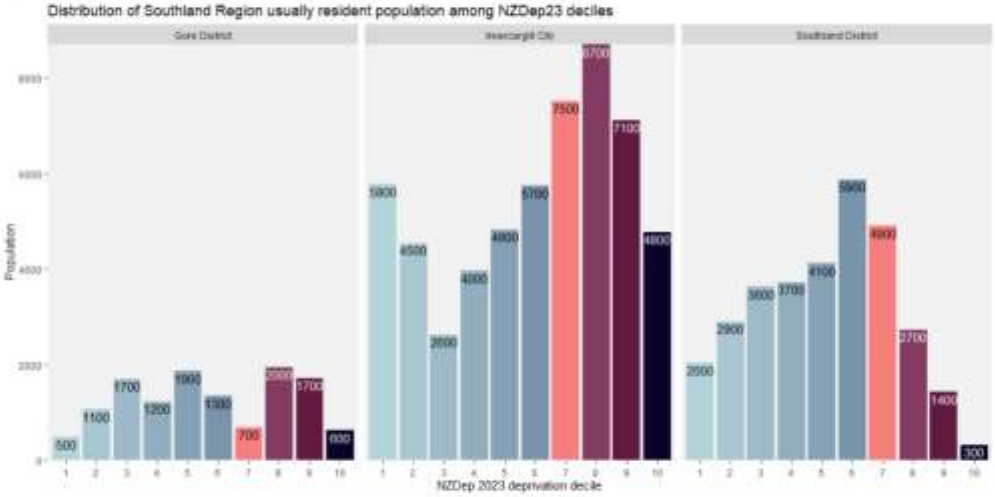


Figure 5. Selected off-licences and SA1-level deprivation deciles in Southland Region

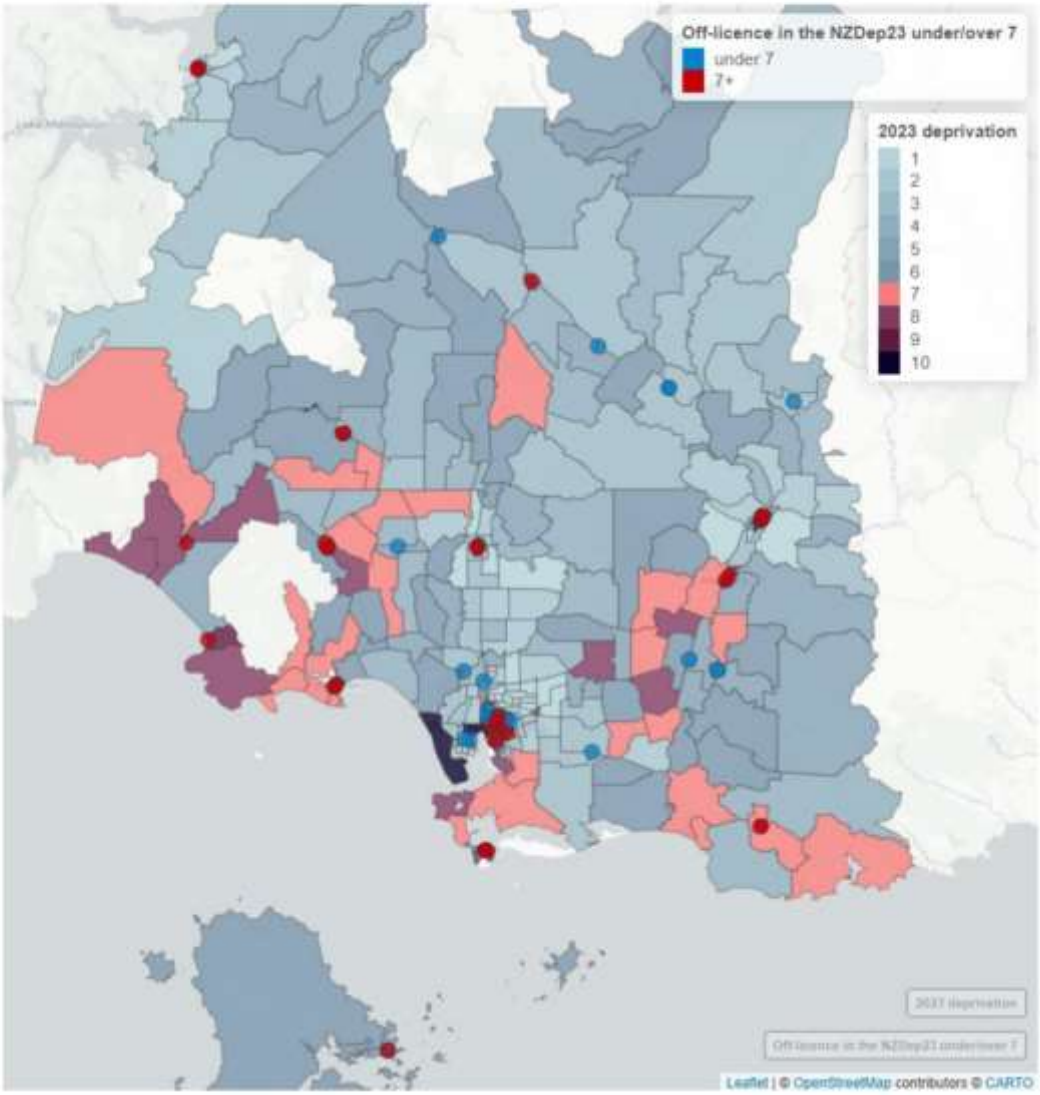


Figure 6. Selected off-licences and SA1-level deprivation deciles in the Gore District (Edendale tavern not shown due to being outside the selected map area).

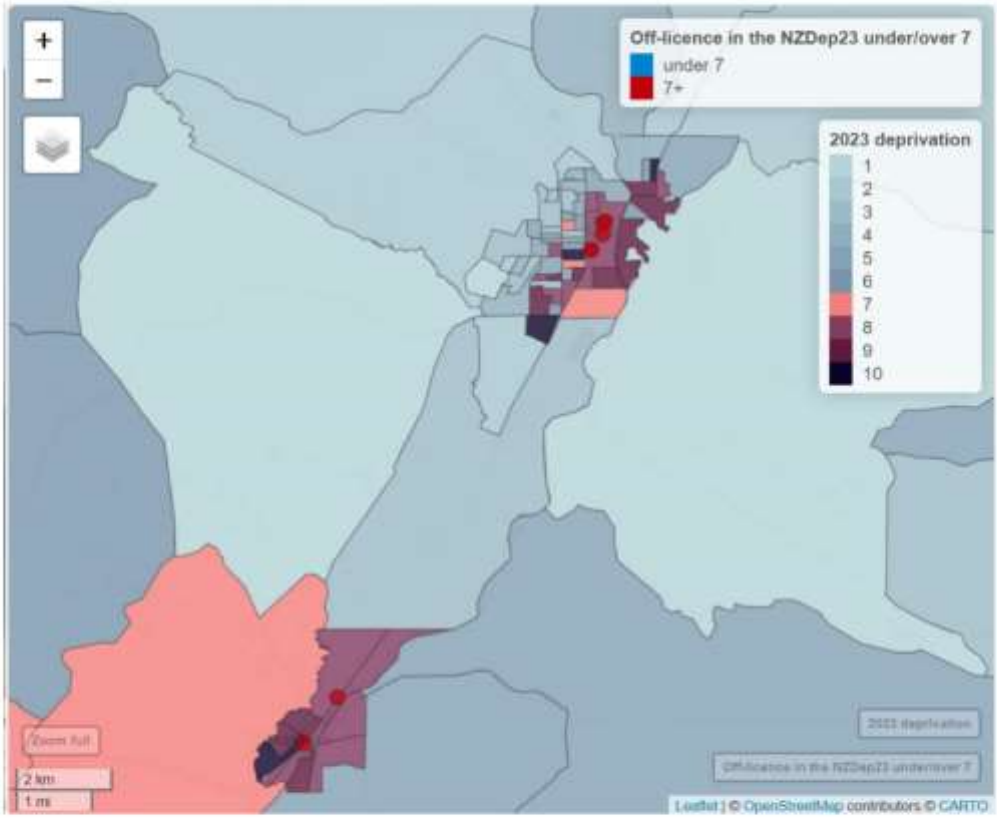


Figure 7. Selected off-licences and SA1-level deprivation deciles in Invercargill City

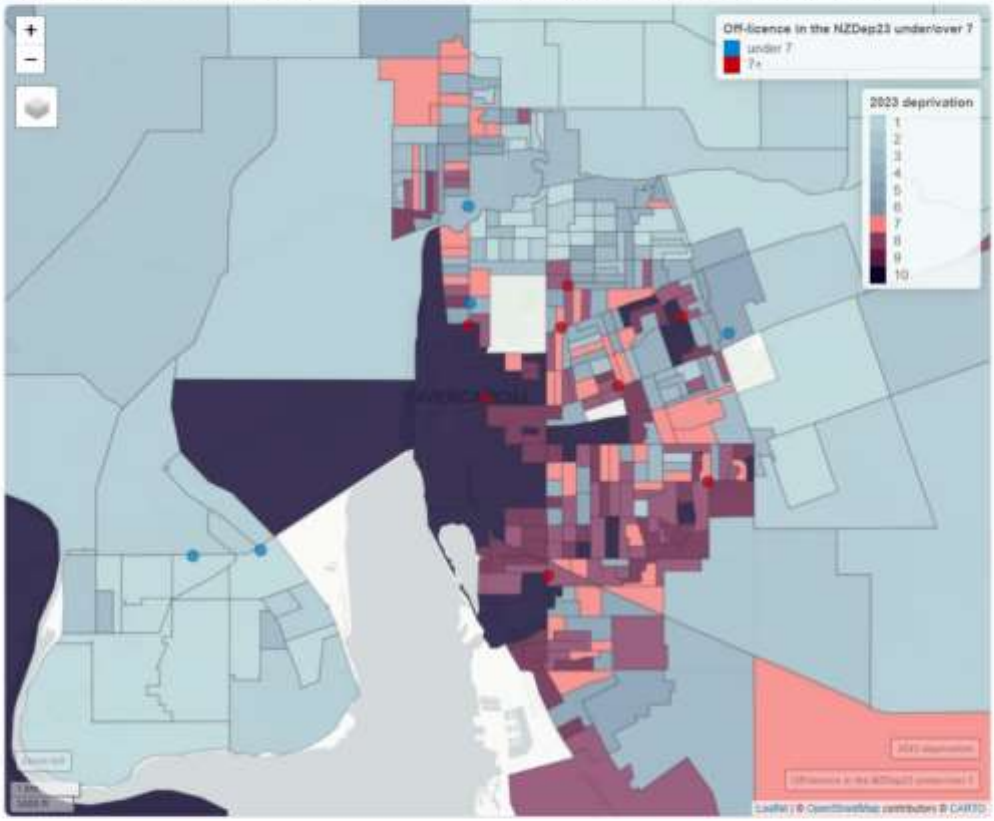
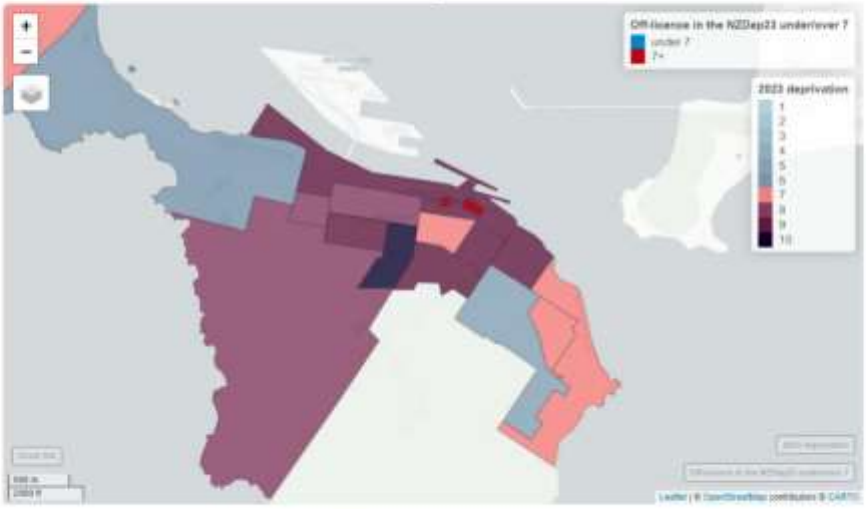


Figure 8. Selected off-licences and SA1-level deprivation deciles in Bluff



Health New Zealand
Te Whatu Ora

Alcohol-related Emergency Department presentations to Southland Hospital in 2024

Te Waipounamu, Southern District

05/08/2025

Requested by: Michael Butchard, MOoH
Completed by: NPHS Intelligence Directorate
Purpose: Update of a yearly report
Data: 1. Southern District Patient Information System extract. 2. NNPAC extract
Limitations: Issues with data recording quality and quality deterioration does not permit direct comparisons of visit counts from year to year and between hospitals.

Introduction

This report is based on the dataset recording presentations to Emergency Department of Southland Public Hospital in 2024 (extracted from 1. local database in April 2025 and 2. from National Non-admitted Patient Collection in May 2025) and compared to the previous 6-year values and averages (2018 to 2023). Southland Hospital is located in Invercargill City, which has an overall resident population of ~ 68 000 with total yearly ED visits of ~ 38 000. Whether a presentation is related to alcohol consumption or not is recorded in a flag variable, required by the Ministry of Health, which captures the following grades:

- Yes - alcohol consumption is directly associated with this presentation,
- Secondary - consequence of others' alcohol consumption,
- No - alcohol consumption is NOT directly associated with this presentation,
- Not known - couldn't determine if alcohol is associated with this presentation.

Although the alcohol variable is mandatory, there are issues with data recording quality and data transfer from the local ED database to National Collections. Missing records and those recorded as unrelated to alcohol are combined in a single category.

Alcohol-related presentations are compared to unrelated ones by:

- Absolute visit counts and visit periodicity (day of the week and hour of the day),
- Basic demographic traits of presenters (age and gender),
- Clinical characteristic of the visits (mode of arrival, triage, admission rates, ACC claims).

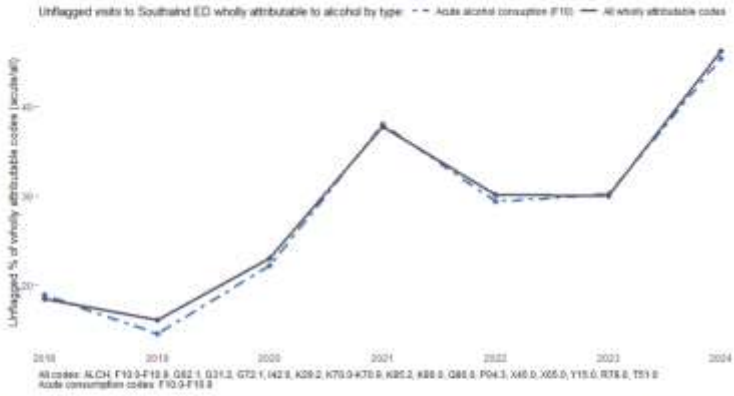
Data recording quality

In 2024 a total of 106 ED visits were diagnosed with 100% alcohol-attributable conditions (ICD-10 codes F10.0, F10.2, F10.3, F10.4, F10.5, K29.2, K70.3, R78.0 and T51.0). Of those, 49 (46%) were not labelled as alcohol-related by Ministry of Health alcohol flag variable, indicating serious undercounting of true alcohol-related presentations. The percentage of such un-flagged ED visits wholly attributable to alcohol consumption increased from 18% in 2018 to 46% in 2024.

Table 1. ED visits with ICD-10 codes wholly attributable to alcohol; and the number (percentage) missing the Ministry of Health alcohol flag (unflagged).

	2018	2019	2020	2021	2022	2023	2024
Total	87	93	87	82	73	70	106
Unflagged	16 (18%)	15 (16%)	20 (23%)	31 (38%)	22 (30%)	21 (30%)	49 (46%)

Conditions related to acute alcohol consumption (F10.0-F10.9) comprise 89% of the full list of codes wholly attributable to alcohol. The fraction of unflagged visits with these "acute codes" is higher in the past four years (2021 – 2024) compared to 2018 - 2020, with 45% missing the flag in 2024. Since the conditions wholly attributable to acute alcohol consumption represent the least ambiguous situation for the application of the alcohol flag, the trend depicted in Figure 1 strongly suggests a poor and declining quality of alcohol flag use over time. Therefore, direct comparisons of visit counts from year to year and between hospitals are not recommended.



Alcohol-related visits to Southland ED, 2023 **Page | 2**

Figure 1. Percentage of ED visits with conditions wholly attributable to alcohol, which were not flagged as related to alcohol by Ministry of Health flag.

To compensate for the poor quality of the flag variable, an adjusted visit count was estimated by applying year-appropriate corrections to the raw yearly counts (e.g. in 2024 the raw count was 427, a percentage of correctly flagged visits is 100 – 46.2 = 53.8, and the estimated true visit count is (427 / 53.8) * 100 = 794). Since the true degree of quality reduction in any given year is unknown, the correction factor is based directly on the percentage of unflagged ICD-10 codes wholly attributable to alcohol as the only available metric. It can also be seen as a conservative estimate, since visits with 100% alcohol-attributable ICD-10 codes are presumably the least likely codes to be unflagged. As such, even when this correction is applied to raw visits counts, it is likely that the true volume of alcohol-related presentations is still underestimated.

Periodicity and number of ED visits

Before correction, the average daily number of alcohol-related presentations was 1.2 (SD ±1.2) in 2024 compared to the average of 1.5 (SD ±1.6) in 2018-2023. After applying the correction factor, average daily number of alcohol-related visits was 2.2 in 2024 compared to 2.1 in 2018-2023.

The numbers of presentations wholly attributable to acute alcohol consumption (ICD-10 codes F10.1-F10.9; counted irrespective of the alcohol flag) change from year to year without a clear trend. The fraction of such visits varied in a similar manner between 0.17% and 0.24% of all ED presentations.

Table 2. Total and alcohol-related ED presentations. All values are given as both raw counts and estimates based on a year-specific percentage of correctly flagged presentations

	2018	2019	2020	2021*	2022	2023	2024
Alcohol-related (corrected)	832	810	779	859	642	610	794
Alcohol-related (raw count)	679	680	600	534	449	427	427
Estimated undercounting	153	130	179	325	193	183	367
Visits with 'F10' ICD-10 codes	74	76	81	71	68	63	97
Total ED presentations (all causes)	38652	39517	36596	39013	36702	36891	40391

* data for 2021 does not include estimated 27 visits lost in the raw visit counts due to a software issue

Overall, ED visits are distributed evenly throughout the week. By contrast, alcohol-related presentations increase notably toward the weekend. Maximum visit count, which occurs on Sunday, is 2-3 times higher compared to working days. Hours between 9 PM on Saturday and

Commented [YT1]: Your original comment was: "These seem too low. I thought those ICD-10 codes accounted for 89% of all alcohol related flagged ED visits?".

Commented [YT2R1]: No, acute codes (F10) account for 89% of all wholly-attributable codes (F10, K29.2, K70.3, R78.0 and T51.0), **not** all alc. flagged visits.
The numbers of visits with all wholly-attributable codes are given in table 1, and for 2024 there was a total of 106 such visits. 97, or about 88% of these, are visits with acute codes (F10). Alcohol-attributable codes do not overlap perfectly with alcohol flag - that's why we started thinking that there may be undercounting in the flag variable in the first place.

4 AM on Sunday see the highest average number of alcohol-related visits. Dates with the highest number of alcohol-related visits are given in Appendix I.

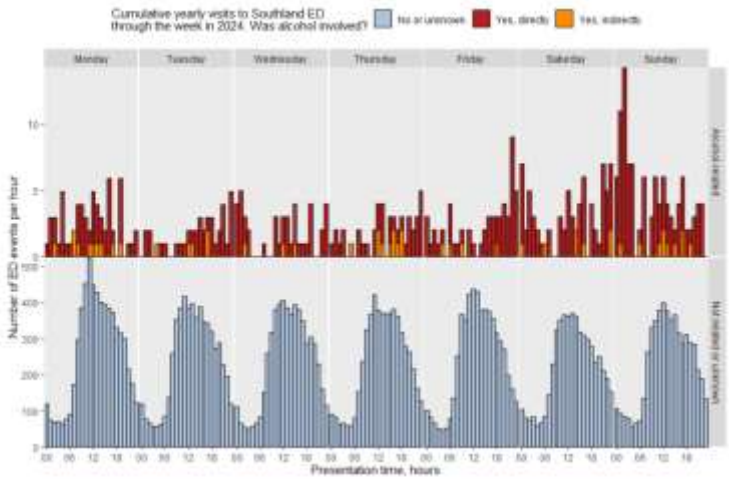


Figure 2. Distribution of yearly visits (uncorrected) by time of the day and day of the week.

Demography of presentations: gender and age

Presenters aged 15 to 24 consistently have the highest numbers of alcohol-related ED visits. They make up a higher proportion (2%) of all ED presentations compared to other age-groups and account for one third of all alcohol-related visits. For adults aged 25 to 34, 35 to 44 and 45 to 54 years alcohol-related presentations also comprise a sizable proportion (>1.4%) of all ED presentations in each of the age groups.

In almost all age groups males visit Southland Hospital ED with alcohol-related presentations more frequently than females. The average percentage of alcohol-related presentations out of all visits is twice as high for males (1.4%) compared to females (0.7%).

Table 3. Alcohol-related ED presentations (uncorrected) in 2024 by age group and gender

Age group	female/male	total count	% of all-cause ED visits	% of alcohol-related visits
< 15	2/3	5	0.1%	1.2%
15-24	39/68	107	2.0%	25.1%

25-34	23/53	76	1.4%	17.8%
35-44	31/43	74	1.6%	17.3%
45-54	18/38	56	1.5%	13.1%
55-64	15/38	53	1.2%	12.4%
65-74	5/22	27	0.6%	6.3%
75+	9/20	29	0.5%	6.8%

Note: cases where gender is recorded as "other" or "unknown" are excluded from gender-specific counts, but not from yearly averages and percentages. * Visit counts with data gap in place.

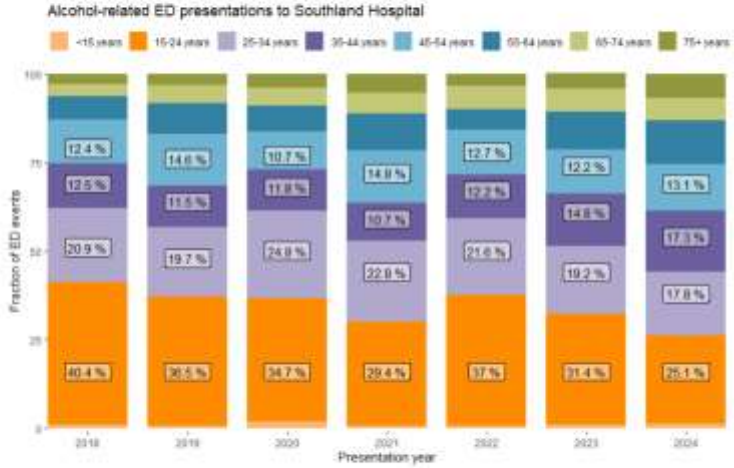


Figure 3. Year by year fractions of alcohol-related presentations (uncorrected) among age groups.

Associated ACC claims

On average, 62% (+/- 10%) of all alcohol-related ED visits had an associated ACC claim, compared to 36% (+/- 3%) for the ED presentations unrelated to alcohol.

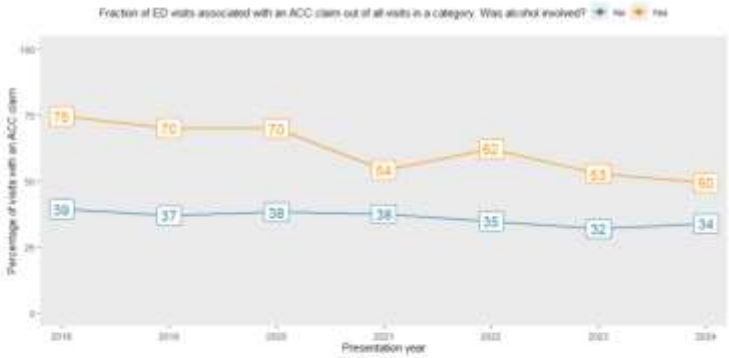


Figure 4. Percentage of ED visits with an ACC claim number among presentations related and unrelated to alcohol.

Clinical characteristics

For alcohol-related presentations, ambulance and police were significantly more frequent modes of arrival to ED compared to visits unrelated to alcohol: police were involved 26 times more frequently and ambulance 2 times more frequently in alcohol-related presentations. Walk-ins, by contrast, were less frequent in this group (56% vs 83%).

Table 4. Mode of arrival for ED presentations in 2024 (uncorrected)

Mode of arrival	Alcohol-related (directly and indirectly)	Unrelated to alcohol or unknown	Pairwise z-test p-value
Ambulance	178 (41.7%)	6819 (17.1%)	< 0.001
Police	11 (2.6%)	37 (0.1%)	< 0.001
Walk-in	237 (55.5%)	33010 (82.6%)	< 0.001
Other or unknown	1 (0.2%)	98 (0.2%)	-

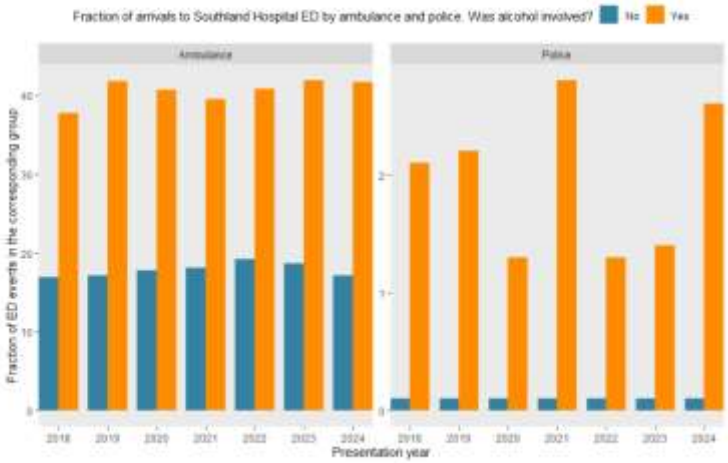


Figure 5: Yearly trends in arrivals by ambulance and police

Presentations with the two highest severity grades (resuscitation and emergency) were significantly more frequent among alcohol-related visits, whereas semi-urgent presentations were less frequent.

Table 6. Severity for ED presentations in 2024: a yearly average and percentage (based on uncorrected counts)

Severity of presentation	Alcohol-related	Unrelated or unknown	Pairwise z-test p-value
Resuscitation	7 (1.6%)	124 (0.3%)	< 0.001
Emergency	101 (23.7%)	5920 (14.8%)	< 0.001
Urgent	218 (51.1%)	19599 (49%)	> 0.1
Semi-urgent	90 (21.1%)	13218 (33.1%)	< 0.001
Non-urgent or unknown	11 (2.6%)	1103 (2.8%)	> 0.1

The admission rate was very similar for alcohol-related ED presentations and ones unrelated to alcohol, with 2024 data in agreement with the previous 6-year average.

Table 5. Admission rates of ED presentations in 2024 (uncorrected)

	2024 (% of all visits)	**2018 – 2023** % of all visits
Alcohol-related	70 (16.4%)	22%
Not related or unknown	7602 (19%)	23%

ED visits by statistical areas and deprivation deciles

A majority of alcohol-related ED visits to Southland Hospital were made by residents of Invercargill City TA.

Table 6. ED attenders with addresses inside and outside of Invercargill City TA (uncorrected counts)

	2018	**2019**	**2020**	**2021***	**2022**	**2023**	**2024**
All alcohol-related visits	679	680	600	534	449	427	427
Visits by residents	507 (75%)	484 (71%)	433 (72%)	395 (74%)	322 (72%)	285 (67%)	302 (71%)

* data for 2021 does not include estimated 27 visits lost in the raw visit counts due to a software issue

Among the residents of Invercargill City, alcohol-related visits were not distributed evenly between constituent SA1s. Yearly SA1-level rates of alcohol-related ED visits per 1000 residents averaged over 7-year period varied from 0 to 78, with a median value of 5.

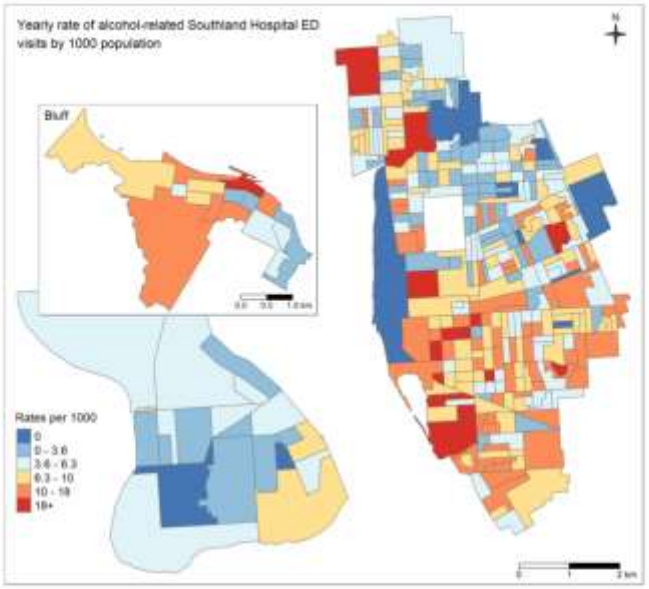


Figure 6. SA1-level distribution of alcohol-related visit yearly rates by residents of metropolitan Invercargill and Bluff, averaged over 7 years (2018 to 2024).

One of the important factors associated with the alcohol-related visit rates and year-to-year consistency of ED presentations is deprivation decile. Both 7-year median rates and number of years an SA1 contributed to ED attendance were positively correlated with deprivation (correlation coefficients of 0.4 and 0.43). Although the strength of the relationship is moderate, the positive nature of the correlation is without doubt (p-values of Pearson's correlation tests < 0.001).

Areas with NZDep 2018 decile 7, 8, 9 and 10 together provided 71% of alcohol-related ED visits, with the 9th decile alone contributing 27% of all such visits. Corrected for population size, yearly rate of ED presentations increased steadily with higher deprivation.

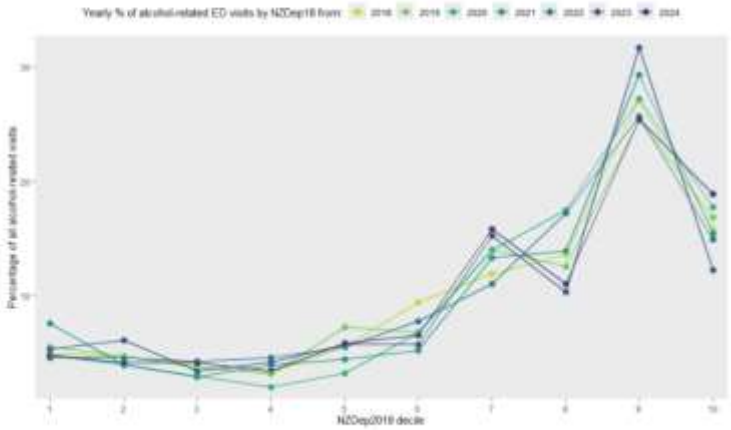


Figure 7. Yearly percentage of alcohol-related visits to the Southland Hospital ED (2018 to 2024) by NZDep2018 decile

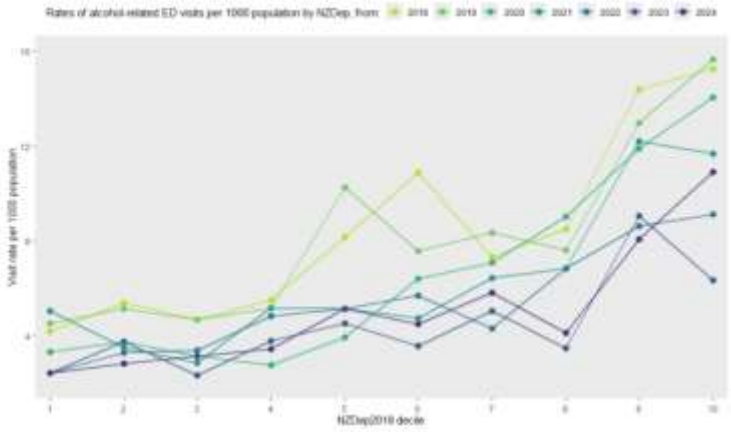


Figure 8. Yearly rates of alcohol-related visits to Southland Hospital ED (2018 to 2024) by NZDep2018 decile

Appendix 1. Dates with the highest percentage (within top 5%) of alcohol-related visits within each year.

2018-01-01, 2018-02-18, 2018-02-25, 2018-03-04, 2018-03-18, 2018-03-31, 2018-04-29, 2018-05-20, 2018-07-14, 2018-07-15, 2018-09-15, 2018-09-16, 2018-10-07, 2018-12-16.

2019-01-01, 2019-03-10, 2019-03-17, 2019-04-06, 2019-04-07, 2019-04-19, 2019-04-27, 2019-06-01, 2019-06-16, 2019-08-24, 2019-09-01, 2019-10-05, 2019-12-07, 2019-12-08.

2020-01-01, 2020-06-06, 2020-07-05, 2020-08-15, 2020-08-16, 2020-08-30, 2020-10-18, 2020-10-24, 2020-11-01, 2020-12-20.

2021-01-17, 2021-02-16, 2021-02-27, 2021-03-07, 2021-03-21, 2021-04-24, 2021-05-02, 2021-05-09, 2021-05-22, 2021-06-06, 2021-07-26, 2021-08-15, 2021-10-10, 2021-11-14, 2021-12-04.

2022-01-01, 2022-01-29, 2022-02-26, 2022-08-19, 2022-08-21, 2022-09-25, 2022-10-30, 2022-11-13, 2022-12-03.

2023-02-04, 2023-02-05, 2023-02-12, 2023-02-19, 2023-04-08, 2023-04-16, 2023-05-20, 2023-05-28, 2023-07-16, 2023-10-01, 2023-10-08, 2023-10-13, 2023-10-23, 2023-11-26, 2023-12-02, 2023-12-16, 2023-12-17, 2023-12-25.

2024-01-01, 2024-01-20, 2024-03-17, 2024-05-12, 2024-08-25, 2024-11-07, 2024-12-01, 2024-12-07.

ICC/SDC COMBINED LOCAL ALCOHOL POLICY – 2025 REVIEW

CONTROLLED PURCHASE OPERATION (CPO) INFORMATION

RELEVANT TIME FRAME – current Policy Operative 31 March 2020, until July 2025

INTRODUCTION:
The following information is relevant for the Operative time frame of the current Policy, which is March 2020 until present.

This time frame includes a 2 year hiatus of CPO's being conducted due to COVID and post COVID restrictions and requirements.

The information is for the Southland District, but will also show information for each Territorial Authority contained within.

CPO'S CONDUCTED:
Gore District Council (GDC) = 1
Southland District Council (SDC) = 3
Invercargill City Council (ICC) = 2

TOTAL = 6

PREMISES CHECKED:
GDC = 6
SDC = 27
ICC = 22

TOTAL = 55

CPO FAILURES (alcohol sold to minor):
GDC = 1
SDC = 3
ICC = 0

TOTAL = 4

CPO FAILURE PREMISES TYPE:
Supermarket/Grocery store = 1
Bottle Store = 1
Hotel/Tavern = 2

CPO FAILURE LICENCE TYPE:
Off Licence = 4

POST CPO ENFORCEMENT APPLICATIONS TO ALCOHOL REGULATORY LICENSING AUTHORITY:

Application for suspension of Managers Certificate = 3
GDC = 1 (Police)
SDC = 2 (1 x Police, 1 x Licensing Inspector)

Application for suspension of Off Licence = 1
SDC = 1 (Police)

OUTCOME OF SUSPENSION APPLICATIONS:

28 day suspension of Managers Certificate = 3

[2021] NZARLA 69
[2023] NZARLA 169
[2024] NZARLA 144

48 hour suspension of Off Licence = 1

[2024] NZARLA 143

INFORMATION PREPARED AND SUPPLIED BY –

3rd JULY 2025

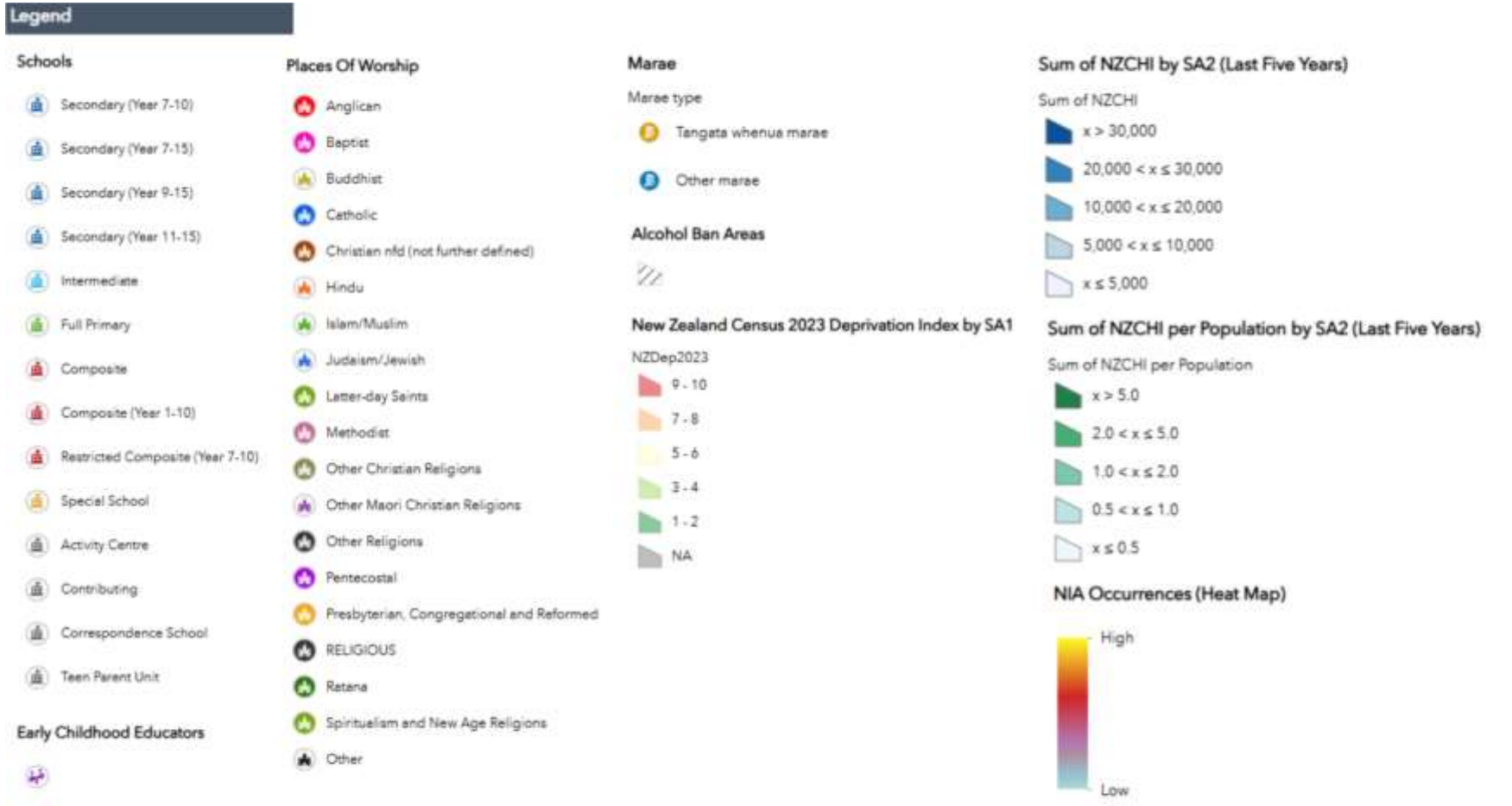
Sergeant Hayden McNaught, HMW820. NZ Police, based in Invercargill.
Current position – Alcohol Harm Prevention Officer

Southland District and Invercargill City Councils

Police recorded alcohol harm from the National Alcohol Harm Viewer

1 July 2020 to 31 May 2025

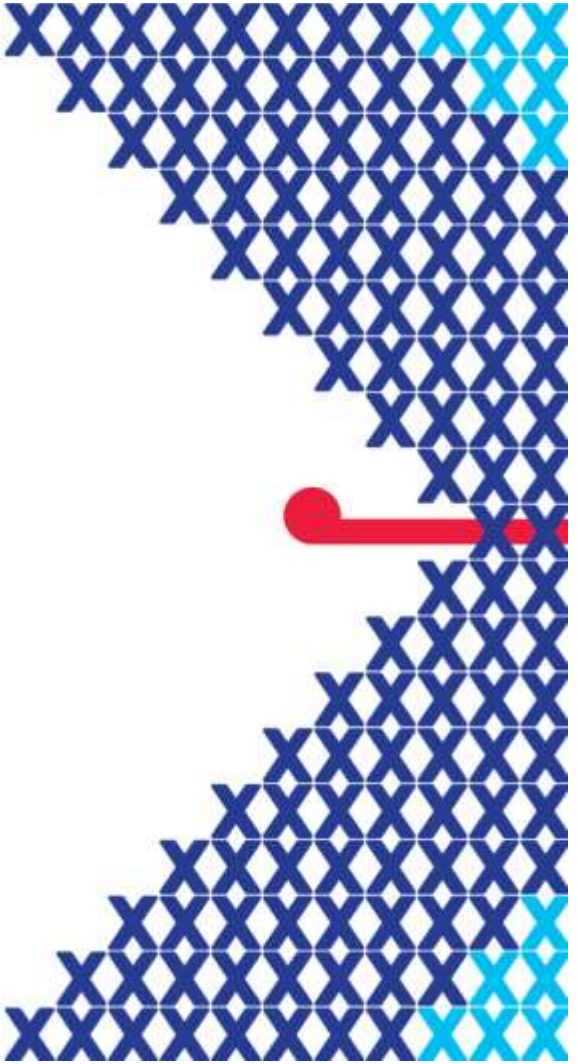
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa


Legend
Schools
Secondary (Year 7-10)
Secondary (Year 7-15)
Secondary (Year 9-15)
Secondary (Year 11-15)
Intermediate
Full Primary
Composite
Composite (Year 1-10)
Restricted Composite (Year 7-10)
Special School
Activity Centre
Contributing
Correspondence School
Teen Parent Unit
Early Childhood Educators
Places Of Worship
Anglican
Baptist
Buddhist
Catholic
Christian nfd (not further defined)
Hindu
Islam/Muslim
Judaism/Jewish
Latter-day Saints
Methodist
Other Christian Religions
Other Maori Christian Religions
Other Religions
Pentecostal
Presbyterian, Congregational and Reformed
RELIGIOUS
Ratana
Spiritualism and New Age Religions
Other
Marae
Marae type
Tangata whenua marae
Other marae
Alcohol Ban Areas
New Zealand Census 2023 Deprivation Index by SA1
NZDep2023
9 - 10
7 - 8
5 - 6
3 - 4
1 - 2
NA
Sum of NZCHI by SA2 (Last Five Years)
Sum of NZCHI
x > 30,000
20,000 < x ≤ 30,000
10,000 < x ≤ 20,000
5,000 < x ≤ 10,000
x ≤ 5,000
Sum of NZCHI per Population by SA2 (Last Five Years)
Sum of NZCHI per Population
x > 5.0
2.0 < x ≤ 5.0
1.0 < x ≤ 2.0
0.5 < x ≤ 1.0
x ≤ 0.5
NIA Occurrences (Heat Map)
High
Low

2

Southland

NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa



Edendale

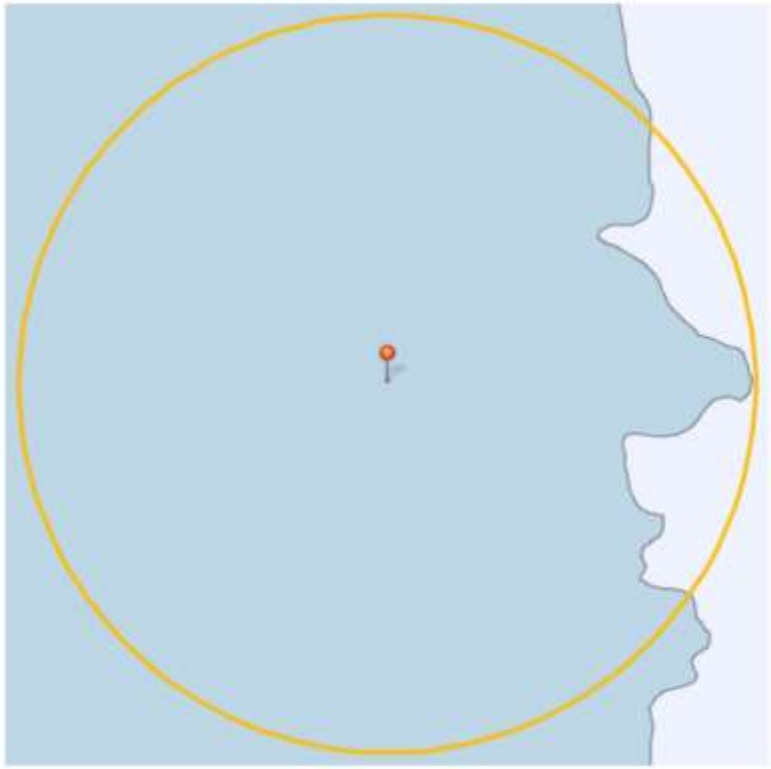
Within 5km of 46 Ferry Road

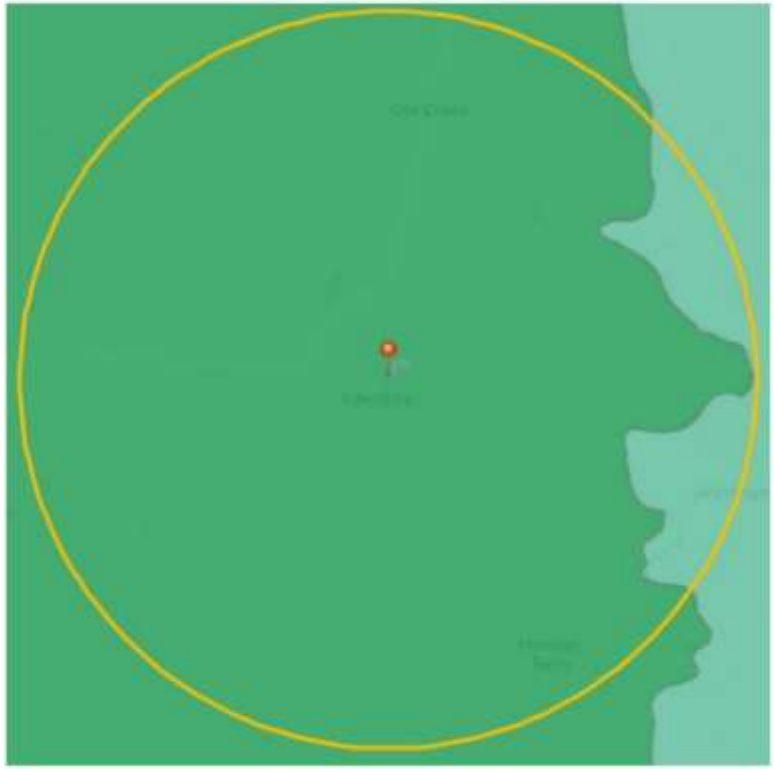
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

NZ Deprivation Index 2023 and alcohol ban area/s in Edendale

90

NZ Crime Harm Index (NZCHI) scores, by Statistical Area 2 (SA2) - Edendale





91

Police recorded alcohol-related harm in Edendale

Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Edendale-Woodlands	6	17	32	18	16	6	95
Wyndham-Catlins	5	4	5	1	7	3	25
Grand Total	**11**	**21**	**37**	**19**	**23**	**9**	**120**

92

Police recorded alcohol-related harm in Edendale

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		3			1	1	5
ACTS INTENDED TO CAUSE INJURY	1	4	5	1	3	1	15
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		2	1	2	3		8
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			2		1		3
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1	3	1			5
PUBLIC ORDER OFFENCES		1	2				3
SEXUAL ASSAULT AND RELATED OFFENCES	2	1					3
THEFT AND RELATED OFFENCES	1						1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	2	3	10	11	11	2	39
UNKNOWN ANZSOC DIVISION	5	5	14	4	4	5	37
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER		1					1
Grand Total	**11**	**21**	**37**	**19**	**23**	**9**	**120**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1	2	1	3	1	8
Feb		2	2		1	2	7
Mar			3	1	1		5
Apr		7	1	2	4		14
May			1	2		6	9
Jun		2	6	1	4		13
Jul	2	3	3	4			12
Aug	5	4	1	3	6		19
Sep		1	2				3
Oct	1		1	2	1		5
Nov			11	3	1		15
Dec	3	1	4		2		10
Grand Total	**11**	**21**	**37**	**19**	**23**	**9**	**120**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1		5		2		8
Tue	1			3			4
Wed	2	2	2		2	2	10
Thu	2	1	10			2	15
Fri		8	5	6	5	1	25
Sat	5	3	4	9	10	1	32
Sun		7	11	1	4	3	26
Grand Total	**11**	**21**	**37**	**19**	**23**	**9**	**120**

93

Police recorded alcohol-related harm in Edendale

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	2	5	2	5		16
1am-1.59am		1			3		4
2am-2.59am			1		1		2
3am-3.59am			1	2			3
4am-4.59am				2	1	1	4
5am-5.59am		1					1
7am-7.59am				1			1
8am-8.59am			3				3
9am-9.59am			1				1
10am-10.59am	1	1				1	3
11am-11.59am			1		1		2
12pm-12.59pm			1				1
1pm-1.59pm	1				3		4
2pm-2.59pm			2	3			5
3pm-3.59pm	2				4		6
4pm-4.59pm		1	5			1	7
5pm-5.59pm						2	2
6pm-6.59pm		4	1			2	7
7pm-7.59pm	1		4	4	1		10
8pm-8.59pm	1	7	2	1	1		12
9pm-9.59pm			4	2	1		7
10pm-10.59pm	3	3	3	2	2	2	15
11pm-11.59pm		1	3				4
Grand Total	**11**	**21**	**37**	**19**	**23**	**9**	**120**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5	3	4	17	6	1	2	33
6	3	5	8	9	15	5	45
7	3	10	9	4	6	1	33
8	2	2	3		1	1	9
Grand Total	**11**	**21**	**37**	**19**	**23**	**9**	**120**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial	1						1
In Transit			4	3	2		9
Not Applicable			1				1
Online			1				1
Public Space	4	9	12	13	16	4	58
Residential	5	12	19	3	5	5	49
Retail	1						1
Grand Total	**11**	**21**	**37**	**19**	**23**	**9**	**120**

94

Police recorded alcohol-related harm in outdoor public places, in Edendale

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan				1	3		4
Feb			1		1		2
Mar				1	1		2
Apr				1	3		4
May			1	1		4	6
Jun		2	2		2		6
Jul		2	2	4			8
Aug	3	4			3		10
Sep		1					1
Oct			1	2	1		4
Nov			3	3			6
Dec	1		2		2		5
Grand Total	**4**	**9**	**12**	**13**	**16**	**4**	**58**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1		2		1		4
Wed		2			1	1	4
Thu	1		2				3
Fri		1	3	5	5		14
Sat	2	1		7	6		16
Sun		5	5	1	3	3	17
Grand Total	**4**	**9**	**12**	**13**	**16**	**4**	**58**

95

Police recorded alcohol-related harm in outdoor public places, in Edendale

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A						1	1
ACTS INTENDED TO CAUSE INJURY	1	1			1	1	4
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		2	1	2	3		8
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1		1		2
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1					1
PUBLIC ORDER OFFENCES		1	2				3
TRAFFIC AND VEHICLE REGULATORY OFFENCES	2	3	7	8	9	2	31
UNKNOWN ANZSOC DIVISION	1	1	1	3	2		8
Grand Total	**4**	**9**	**12**	**13**	**16**	**4**	**58**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am		2	1	2	4		9
1am-1.59am					3		3
2am-2.59am			1		1		2
3am-3.59am			1	1			2
4am-4.59am				2		1	3
5am-5.59am		1					1
10am-10.59am						1	1
11am-11.59am					1		1
1pm-1.59pm	1						1
3pm-3.59pm					3		3
4pm-4.59pm			3				3
5pm-5.59pm						2	2
6pm-6.59pm		3					3
7pm-7.59pm	1		2	4	1		8
8pm-8.59pm		1	2	1	1		5
9pm-9.59pm				2	1		3
10pm-10.59pm	2	2	2	1	1		8
Grand Total	**4**	**9**	**12**	**13**	**16**	**4**	**58**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5	1	3	3	3	1		11
6	2	4	3	7	9	4	29
7	1	1	6	3	5		16
8		1			1		2
Grand Total	**4**	**9**	**12**	**13**	**16**	**4**	**58**

96

Drink driving in Edendale

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan			1		3		4
Feb			1		1		2
Mar			1	1	1		3
Apr				1	3		4
May			1	2		2	5
Jun		1		1	2		4
Jul		1	1	4			6
Aug	1	1			2		4
Sep		1					1
Oct				1	1		2
Nov			1	1			2
Dec	1		2				3
Grand Total	**2**	**4**	**8**	**11**	**13**	**2**	**40**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			2		2		4
Wed		2	1		1	1	5
Thu	1		2				3
Fri			2	4	4		10
Sat	1		1	7	5		14
Sun		2			1	1	4
Grand Total	**2**	**4**	**8**	**11**	**13**	**2**	**40**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		1			2		3
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1				1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	2	3	7	11	11	2	36
Grand Total	**2**	**4**	**8**	**11**	**13**	**2**	**40**

97

Drink driving in Edendale

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am		1		2	3		6
1am-1.59am					1		1
2am-2.59am			1		1		2
3am-3.59am				1			1
4am-4.59am				1		1	2
5am-5.59am		1					1
7am-7.59am				1			1
8am-8.59am			1				1
10am-10.59am						1	1
11am-11.59am					1		1
1pm-1.59pm	1						1
2pm-2.49pm			1				1
3pm-3.59pm					3		3
4pm-4.59pm			1				1
6pm-6.59pm		1					1
7pm-7.59pm				2	1		3
8pm-8.59pm			2	1	1		4
9pm-9.59pm			1	1	1		3
10pm-10.59pm	1	1	1	2	1		6
Grand Total	**2**	**4**	**8**	**11**	**13**	**2**	**40**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5		1		2	1		4
6	1	3	3	6	7	2	22
7	1		5	3	4		13
8					1		1
Grand Total	**2**	**4**	**8**	**11**	**13**	**2**	**40**

98

Police recorded alcohol-related family harm, in Edendale

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Edendale-Woodlands	1	9	21	3		2	36
Wyndham-Catlins	1	2	2	1	3	2	11
Grand Total	**2**	**11**	**23**	**4**	**3**	**4**	**47**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			3				3
Tue				3			3
Wed			1			1	2
Thu	1	1	6				8
Fri		7	2				9
Sat	1	2	3		3	1	10
Sun		1	8	1		2	12
Grand Total	**2**	**11**	**23**	**4**	**3**	**4**	**47**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1				1	2
Feb		2	1			1	4
Mar			2				2
Apr		7	1				8
May						2	2
Jun			4				4
Jul		1	1				2
Aug	1		1	3	3		8
Sep			2				2
Oct	1						1
Nov			10	1			11
Dec			1				1
Grand Total	**2**	**11**	**23**	**4**	**3**	**4**	**47**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		3			1	1	5
ACTS INTENDED TO CAUSE INJURY		3	5	1	2	1	12
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1				1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION			2	1			3
SEXUAL ASSAULT AND RELATED OFFENCES		1					1
TRAFFIC AND VEHICLE REGULATORY OFFENCES			2				2
UNKNOWN ANZSOC DIVISION	2	4	13	2		2	23
Grand Total	**2**	**11**	**23**	**4**	**3**	**4**	**47**

99

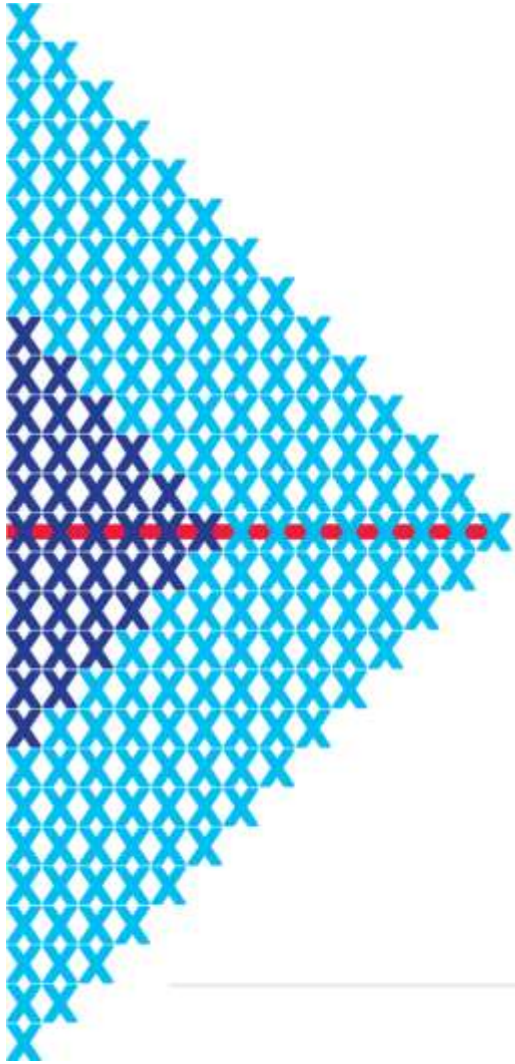
Police recorded alcohol-related family harm, in Edendale

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am			5				5
1am-1.59am		1					1
4am-4.59am				1			1
8am-8.59am			1				1
10am-10.59am	1	1					2
11am-11.59am			1				1
12pm-12.59pm			1				1
1pm-1.59pm					3		3
2pm-2.49pm			1	3			4
4pm-4.59pm			4				4
5pm-5.59pm						2	2
6pm-6.59pm		1	1				2
7pm-7.59pm			2				2
8pm-8.59pm	1	6					7
9pm-9.59pm			3				3
10pm-10.59pm		1	1			2	4
11pm-11.59pm		1	3				4
Grand Total	**2**	**11**	**23**	**4**	**3**	**4**	**47**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5		1	17	3			21
6	1		2	1	3	3	10
7		9	1			1	11
8	1	1	3				5
Grand Total	**2**	**11**	**23**	**4**	**3**	**4**	**47**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Not Applicable			1				1
Online			1				1
Public Space			3	1		2	6
Residential	2	11	18	3	3	2	39
Grand Total	**2**	**11**	**23**	**4**	**3**	**4**	**47**

100



Kennington

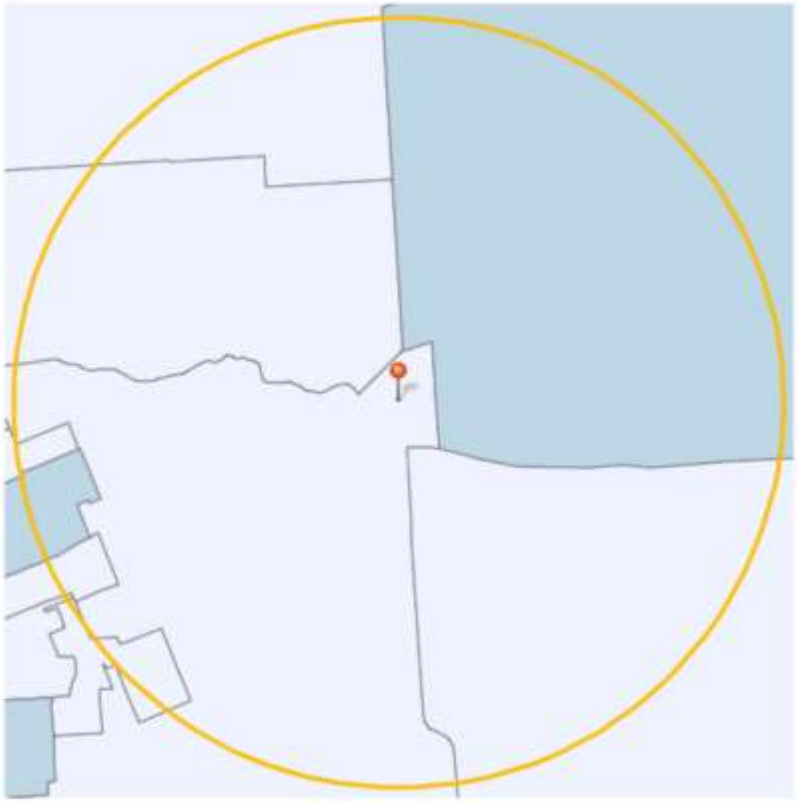
Within 5km of 74 Kennington Road

NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

NZ Deprivation Index 2023 and alcohol ban area/s in Kennington

102

Sum of NZ Crime Harm Index scores - Kennington



103

Police recorded alcohol-related harm in Kennington

Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Glengarry	10	6	12	9	17	9	63
Turnbull Thompson Park	1	3	5	14	16	6	45
Waverley (Invercargill City)		1		1		1	3
Kennington-Tisbury	4	5	9	12	9	4	43
Rockdale					1		1
Edendale-Woodlands		4		3		1	8
Myross Bush	2		1	1		1	5
Awarua Plains		1		6			7
Grove Bush		2					2
Grand Total	**17**	**22**	**27**	**46**	**43**	**22**	**177**

Police recorded alcohol-related harm in Kennington

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		1	1	1	3		6
ACTS INTENDED TO CAUSE INJURY	2	5	4	10	10	5	36
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS						2	2
ILLICIT DRUG OFFENCES					2		2
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS	1			3	2	3	9
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES	1	1		8	7		17
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1		1	3		5
PUBLIC ORDER OFFENCES			2		3	2	7
THEFT AND RELATED OFFENCES		1					1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	5	7	14	10	3	5	44
UNKNOWN ANZSOC DIVISION	8	6	5	10	10	5	44
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER			1	3			4
Grand Total	**17**	**22**	**27**	**46**	**43**	**22**	**177**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2	1	2	6	10	21
Feb			1			2	3
Mar				1	1	2	4
Apr		1	5	5	2	1	14
May			5	5		7	17
Jun			2		1		3
Jul	6	5	5	3	8		27
Aug	3	4	3	3	3		16
Sep	3	2	2	4	1		12
Oct	2	4		5	5		16
Nov		2		3	12		17
Dec	3	2	3	15	4		27
Grand Total	**17**	**22**	**27**	**46**	**43**	**22**	**177**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	2	2	1	5		2	12
Tue		1	4	5	1	2	13
Wed		4	4	12	4		24
Thu	4	3	3	1	10	7	28
Fri	1	3	5	5	2		16
Sat	4	5	6	13	18	3	49
Sun	6	4	4	5	8	8	35
Grand Total	**17**	**22**	**27**	**46**	**43**	**22**	**177**

105

Police recorded alcohol-related harm in Kennington

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	4	1	3	1		3	12
1am-1.59am		1	2		7	1	11
2am-2.59am	4		2	1			7
3am-3.59am			1	1	1		3
4am-4.59am		1				1	2
5am-5.59am	1						1
6am-6.59am					1		1
8am-8.59am			1	2	1		4
10am-10.59am	2		1	2	3	1	9
12pm-12.59pm				4			4
1pm-1.59pm			2			1	3
2pm-2.59pm		1	1		1		3
3pm-3.59pm		1		1			2
4pm-4.59pm		1	1	5			7
5pm-5.59pm		1	2	1	1		5
6pm-6.59pm	1		1	1	3		6
7pm-7.59pm	3	1		6			10
8pm-8.59pm	1	3	2	8	8	2	24
9pm-9.59pm	1	4	4	6	12	10	37
10pm-10.59pm		4	3		3		10
11pm-11.59pm		3	1	7	2	3	16
Grand Total	**17**	**22**	**27**	**46**	**43**	**22**	**177**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	2	6	6	10	3	1	28
2	3	4	2	7	2	1	19
3		1	2	5		2	10
4		1					1
5		1		1		1	3
6	10	5	12	9	17	9	62
8	2	4	4	14	19	7	50
(blank)			1		2	1	4
Grand Total	**17**	**22**	**27**	**46**	**43**	**22**	**177**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial	4	1	2	2	3		12
Community				1			1
In Transit			2	4	6		12
Not Applicable		1					1
Online					2		2
Public Space	9	8	16	12	12	10	67
Residential	4	11	6	26	20	11	78
Retail		1		1		1	3
Unknown			1				1
Grand Total	**17**	**22**	**27**	**46**	**43**	**22**	**177**

106

Police recorded alcohol-related harm in outdoor public places, in Kennington

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2				7	9
Feb			1			1	2
Apr			4	1			5
May			3	1		2	6
Jun			1				1
Jul	5	3	2	1	1		12
Aug	1	2	1	1	1		6
Sep		1	2	1	1		5
Oct				3			3
Nov					8		8
Dec	3		2	4	1		10
Grand Total	**9**	**8**	**16**	**12**	**12**	**10**	**67**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	2						2
Tue			2				2
Wed		3	3	2			8
Thu	1	2	1		3	5	12
Fri	1		3	2			6
Sat	1	2	4	6	8	2	23
Sun	4	1	3	2	1	3	14
Grand Total	**9**	**8**	**16**	**12**	**12**	**10**	**67**

107

Police recorded alcohol-related harm in outdoor public places, in Kennington

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY			1				1
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS						2	2
ILLICIT DRUG OFFENCES					1		1
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS				2		3	5
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES					6		6
PUBLIC ORDER OFFENCES						2	2
TRAFFIC AND VEHICLE REGULATORY OFFENCES	5	7	13	9	3	3	40
UNKNOWN ANZSOC DIVISION	4	1	2	1	2		10
Grand Total	**9**	**8**	**16**	**12**	**12**	**10**	**67**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	3		3			1	7
2am-2.59am	4		2	1			7
3am-3.59am					1		1
4am-4.59am		1					1
6am-6.59am					1		1
8am-8.59am				1	1		2
10am-10.59am			1				1
2pm-2.49pm			1		1		2
4pm-4.59pm		1	1	1			3
6pm-6.59pm	1		1				2
7pm-7.59pm				3			3
8pm-8.59pm	1		1	3		1	6
9pm-9.59pm		2	3	3	8	7	23
10pm-10.59pm		4	2				6
11pm-11.59pm			1			1	2
Grand Total	**9**	**8**	**16**	**12**	**12**	**10**	**67**

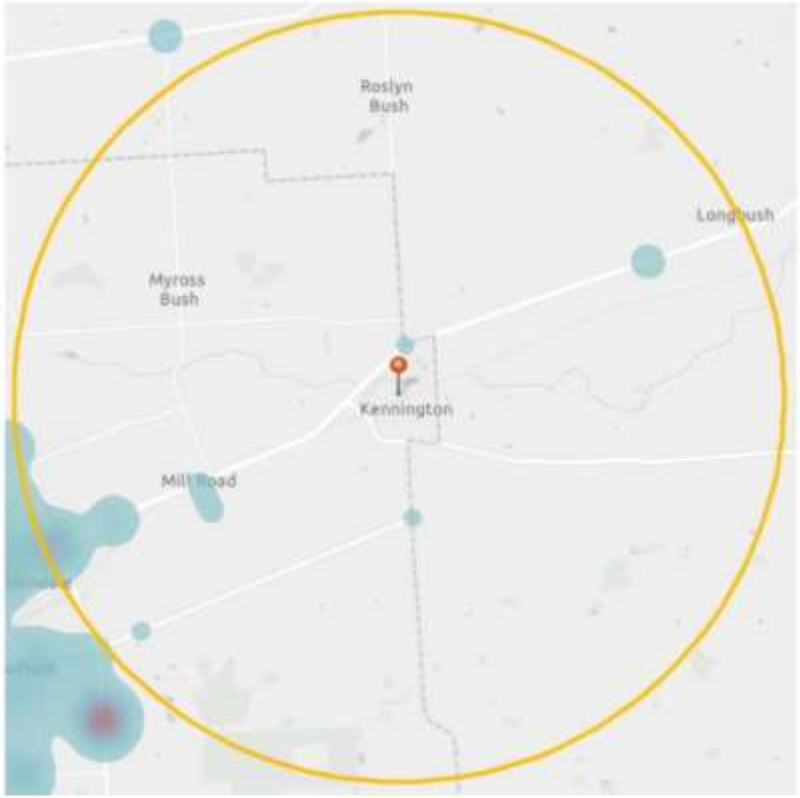
NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	1	2	4	5	2		14
2	2	2	2	2		1	9
3		1	2			2	5
6	5	2	7	4	8	6	32
8	1	1		1		1	4
(blank)			1		2		3
Grand Total	**9**	**8**	**16**	**12**	**12**	**10**	**67**

108

Drink driving in Kennington

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2				2	4
Feb			1			1	2
Apr			3	1			4
May			2	1		2	5
Jul	3	3	2	1	1		10
Aug	1	1	1	2			5
Sep		1	2	1	1		5
Oct				2			2
Nov					1		1
Dec			1	3			4
Grand Total	**4**	**7**	**12**	**11**	**3**	**5**	**42**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Tue			1				1
Wed		2	1	1			4
Thu		2	2	1	2		7
Fri	1		2	2			5
Sat		2	3	6	1	3	15
Sun	3	1	3	1		2	10
Grand Total	**4**	**7**	**12**	**11**	**3**	**5**	**42**



Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS				1			1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	7	12	10	3	5	41
Grand Total	**4**	**7**	**12**	**11**	**3**	**5**	**42**

109

Drink driving in Kennington

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1		3			2	6
1am-1.59am			1				1
2am-2.59am	2		1	1			4
4am-4.59am		1					1
8am-8.59am				1	1		2
10am-10.59am			1				1
2pm-2.49pm					1		1
4pm-4.59pm		1					1
6pm-6.59pm	1		1				2
7pm-7.59pm				4			4
8pm-8.59pm			1	3		1	5
9pm-9.59pm		2	2	2	1	1	8
10pm-10.59pm		3	1				4
11pm-11.59pm			1			1	2
Grand Total	**4**	**7**	**12**	**11**	**3**	**5**	**42**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	1	2	2	5	2		12
2		1	1	2		1	5
3		1	2			1	4
6	2	2	6	4	1	2	17
8	1	1	1			1	4
Grand Total	**4**	**7**	**12**	**11**	**3**	**5**	**42**

110

Police recorded alcohol-related family harm, in Kennington

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Glengarry	5	3	1	1	5	2	17
Turnbull Thompson Park	1	2	1	8	6	5	23
Waverley (Invercargill City)		1				1	2
Kennington-Tisbury	1			2	1		4
Edendale-Woodlands		1		1			2
Awarua Plains				4			4
Grove Bush		2					2
Grand Total	**7**	**9**	**2**	**16**	**12**	**8**	**54**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan				1		2	3
Mar						2	2
Apr		1	1				2
May				1		4	5
Jun					1		1
Jul	1			1	7		9
Aug		2		1	2		5
Sep	3	1					4
Oct	2	2		1			5
Nov		1			2		3
Dec	1	2	1	11			15
Grand Total	**7**	**9**	**2**	**16**	**12**	**8**	**54**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		1				2	3
Tue		1		1		1	3
Wed				9	2		11
Thu	3				5	2	10
Fri		2			1		3
Sat	2	2	1	5	2		12
Sun	2	3	1	1	2	3	12
Grand Total	**7**	**9**	**2**	**16**	**12**	**8**	**54**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		1					1
ACTS INTENDED TO CAUSE INJURY	2	4		2	6	5	19
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS	1				2		3
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES	1			6			7
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1		1	1		3
UNKNOWN ANZSOC DIVISION	3	3	2	7	3	3	21
Grand Total	**7**	**9**	**2**	**16**	**12**	**8**	**54**

111

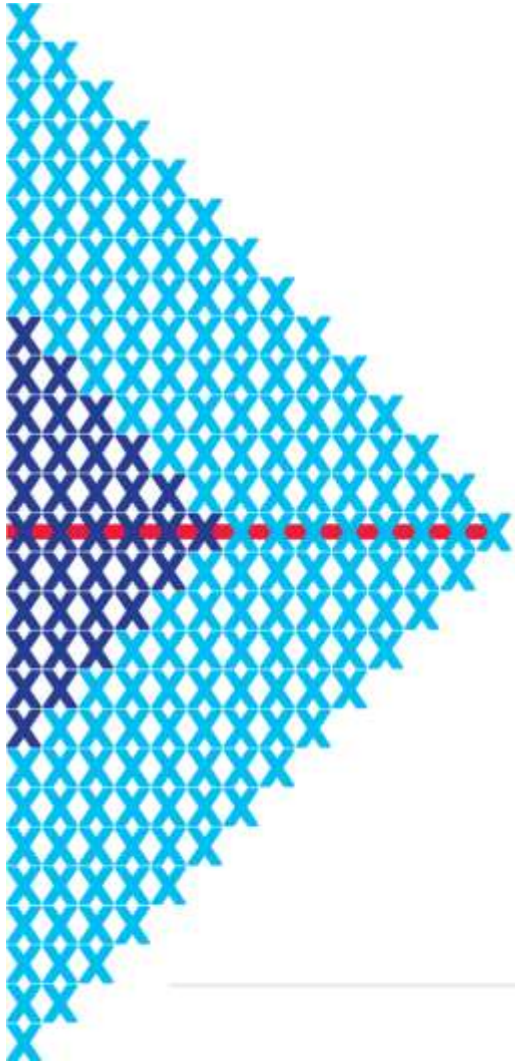
Police recorded alcohol-related family harm, in Kennington

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1	1		1			3
1am-1.59am		1			2	1	4
2am-2.59am	1						1
3am-3.59am			1				1
10am-10.59am	2			1			3
12pm-12.59pm				4			4
1pm-1.59pm						1	1
2pm-2.49pm		1					1
4pm-4.59pm				5			5
5pm-5.59pm		1					1
7pm-7.59pm	3						3
8pm-8.59pm		2		1	7	1	11
9pm-9.59pm		1		1	1	3	6
10pm-10.59pm			1		2		3
11pm-11.59pm		2		3		2	7
Grand Total	**7**	**9**	**2**	**16**	**12**	**8**	**54**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1		3		3			6
2	1			4	1		6
4		1					1
5		1				1	2
6	5	2	1	1	5	2	16
8	1	2	1	8	6	4	22
(blank)						1	1
Grand Total	**7**	**9**	**2**	**16**	**12**	**8**	**54**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial	4	1			1		6
In Transit					4		4
Online					2		2
Public Space	1			1			2
Residential	2	8	2	15	5	8	40
Grand Total	**7**	**9**	**2**	**16**	**12**	**8**	**54**

112

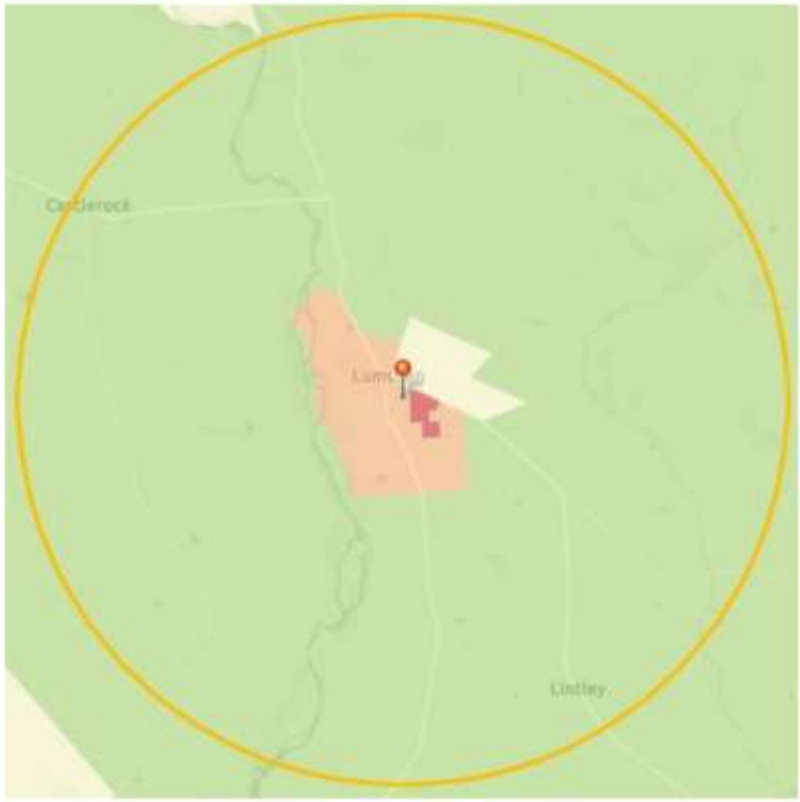


Lumsden

Within 5km of 11 Folia Street

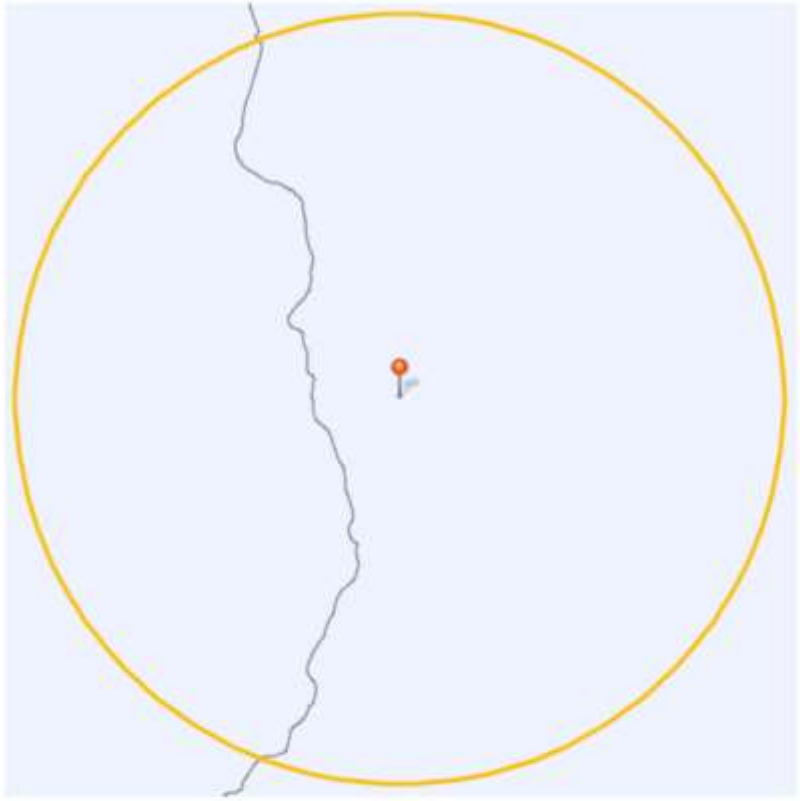
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

NZ Deprivation Index 2023 and alcohol ban area/s in Lumsden



114

Sum of NZ Crime Harm Index scores – Lumsden



115

Police recorded alcohol-related harm in Lumsden

Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Lumsden-Balfour	10	8	10	3	8	3	42
Mossburn	3				1		4
Grand Total	**13**	**8**	**10**	**3**	**9**	**3**	**46**

Police recorded alcohol-related harm in Lumsden

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY			1				1
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	1				1		2
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES	5						5
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1	1				2
PUBLIC ORDER OFFENCES	1		2	1	4		8
SEXUAL ASSAULT AND RELATED OFFENCES		1					1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	3	3	4	1	2	1	14
UNKNOWN ANZSOC DIVISION	3	3	2	1	2	2	13
Grand Total	**13**	**8**	**10**	**3**	**9**	**3**	**46**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan				1			1
Mar			2		3	1	6
Apr		1			1	1	3
May		2			2	1	5
Jun		1					1
Jul		1	5		1		7
Aug	1	1	1	1			4
Oct	6		1	1	1		9
Nov	4	1	1				6
Dec	2	1			1		4
Grand Total	**13**	**8**	**10**	**3**	**9**	**3**	**46**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		1					1
Tue					1	1	2
Wed	1	1				2	4
Thu	6	1	2		1		10
Fri		1	2	2	3		8
Sat	2	1	1		2		6
Sun	4	3	5	1	2		15
Grand Total	**13**	**8**	**10**	**3**	**9**	**3**	**46**

117

Police recorded alcohol-related harm in Lumsden

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1	1	2				4
1am-1.59am		1					1
3am-3.59am	3						3
12pm-12.59pm					1	1	2
1pm-1.59pm			1		1		2
2pm-2.59pm			2	1			3
3pm-3.59pm		1				1	2
4pm-4.59pm					1		1
5pm-5.59pm	1						1
6pm-6.59pm		1			2		3
7pm-7.59pm		1				1	2
8pm-8.59pm	1						1
9pm-9.59pm	6	2	3	1	3		15
10pm-10.59pm		1		1	1		3
11pm-11.59pm	1		2				3
Grand Total	**13**	**8**	**10**	**3**	**9**	**3**	**46**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
3	3				1		4
4			1				1
5		1	4				5
8	10	6	5	3	8	3	35
9		1					1
Grand Total	**13**	**8**	**10**	**3**	**9**	**3**	**46**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial		1	2		1		4
In Transit		1			1		2
Public Space	6	3	5	3	4		21
Residential	7	3	3		2	2	17
Retail					1	1	2
Grand Total	**13**	**8**	**10**	**3**	**9**	**3**	**46**

118

Police recorded alcohol-related harm in outdoor public places, in Lumsden

Division	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	1					1
PUBLIC ORDER OFFENCES	1			1	2	4
TRAFFIC AND VEHICLE REGULATORY OFFENCES	3	2	4	1	1	11
UNKNOWN ANZSOC DIVISION	1	1	1	1	1	5
Grand Total	**6**	**3**	**5**	**3**	**4**	**21**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Jan				1		1
Mar					1	1
Apr					1	1
May		1				1
Jun		1				1
Jul		1	3			4
Aug			1	1		2
Oct	1			1	1	3
Nov	4		1			5
Dec	1				1	2
Grand Total	**6**	**3**	**5**	**3**	**4**	**21**

119

Police recorded alcohol-related harm in outdoor public places, in Lumsden

Day	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Tue					1	1
Thu	1					1
Fri		1	1	2	1	5
Sat	1		1		1	3
Sun	4	2	3	1	1	11
Grand Total	**6**	**3**	**5**	**3**	**4**	**21**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
3	3					3
5			2			2
8	3	2	3	3	4	15
9		1				1
Grand Total	**6**	**3**	**5**	**3**	**4**	**21**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
12am-12.59am	1	1				2
1am-1.59am		1				1
3am-3.59am	3					3
12pm-12.59pm					1	1
1pm-1.59pm			1		1	2
2pm-2.49pm			2	1		3
6pm-6.59pm					1	1
9pm-9.59pm	1	1	1	1	1	5
10pm-10.59pm				1		1
11pm-11.59pm	1		1			2
Grand Total	**6**	**3**	**5**	**3**	**4**	**21**

120

Drink driving in Lumsden

Division	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
TRAFFIC AND VEHICLE REGULATORY OFFENCES	3	3	3	1	2	12
Grand Total	**3**	**3**	**3**	**1**	**2**	**12**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Jan				1		1
Mar					2	2
Apr		1				1
May		1				1
Jun		1				1
Jul			2			2
Oct	1					1
Nov	2		1			3
Grand Total	**3**	**3**	**3**	**1**	**2**	**12**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Thu	1					1
Fri		1	1	1		3
Sat					1	1
Sun	2	2	2		1	7
Grand Total	**3**	**3**	**3**	**1**	**2**	**12**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
12am-12.59am	1	1				2
3am-3.59am	1					1
1pm-1.59pm			1		1	2
2pm-2.49pm			1	1		2
3pm-3.59pm		1				1
6pm-6.59pm					1	1
9pm-9.59pm	1	1				2
11pm-11.59pm			1			1
Grand Total	**3**	**3**	**3**	**1**	**2**	**12**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
3	1					1
5			1			1
8	2	3	2	1	2	10
Grand Total	**3**	**3**	**3**	**1**	**2**	**12**

121

Police recorded alcohol-related family harm, in Lumsden

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2025 (Jan-May)	Grand Total
Lumsden-Balfour	1	1	3	2	7
Grand Total	**1**	**1**	**3**	**2**	**7**

Start time	2020 (Jul-Dec)	2021	2022	2025 (Jan-May)	Grand Total
12am-12.59am			2		2
3pm-3.59pm				1	1
7pm-7.59pm				1	1
8pm-8.59pm	1				1
9pm-9.59pm		1	1		2
Grand Total	**1**	**1**	**3**	**2**	**7**

Division	2020 (Jul-Dec)	2021	2022	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY			1		1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION			1		1
UNKNOWN ANZSOC DIVISION	1	1	1	2	5
Grand Total	**1**	**1**	**3**	**2**	**7**

Month	2020 (Jul-Dec)	2021	2022	2025 (Jan-May)	Grand Total
Mar			2		2
Apr				1	1
May		1		1	2
Jul			1		1
Aug	1				1
Grand Total	**1**	**1**	**3**	**2**	**7**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2025 (Jan-May)	Grand Total
4			1		1
5		1	2		3
8	1			2	3
Grand Total	**1**	**1**	**3**	**2**	**7**

Day	2020 (Jul-Dec)	2021	2022	2025 (Jan-May)	Grand Total
Tue				1	1
Wed	1	1		1	3
Thu			2		2
Sun			1		1
Grand Total	**1**	**1**	**3**	**2**	**7**

Scene type	2020 (Jul-Dec)	2021	2022	2025 (Jan-May)	Grand Total
Residential	1	1	3	2	7
Grand Total	**1**	**1**	**3**	**2**	**7**

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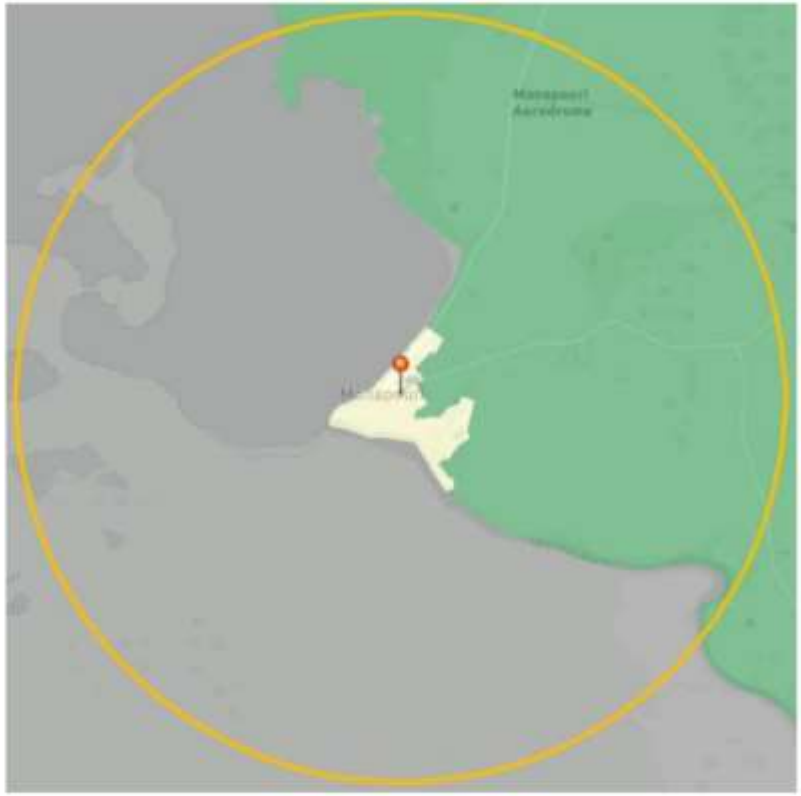
Manapouri

Within 5km of 40 Mararoa Drive

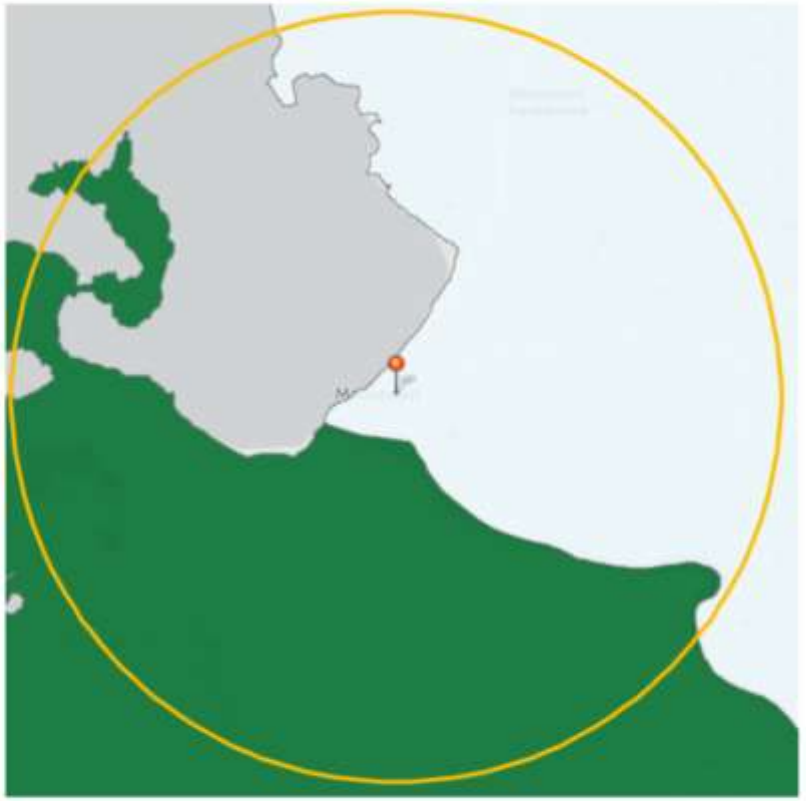
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

NZ Deprivation Index 2023 and alcohol ban area/s in Manapouri



124

Sum of NZ Crime Harm Index scores – Manapouri



125

Police recorded alcohol-related harm in Manapouri

Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mararoa	1	3	4	5	5	2	20
Inland water Lake Manapouri				1			1
Grand Total	**1**	**3**	**4**	**6**	**5**	**2**	**21**

Police recorded alcohol-related harm in Manapouri

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		2					2
ACTS INTENDED TO CAUSE INJURY		1	1	1			3
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1				1
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES					4		4
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION				1			1
PUBLIC ORDER OFFENCES						1	1
TRAFFIC AND VEHICLE REGULATORY OFFENCES			1		1		2
UNKNOWN ANZSOC DIVISION	1		1	4		1	7
Grand Total	**1**	**3**	**4**	**6**	**5**	**2**	**21**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan			1		4		5
Mar				2		1	3
Apr						1	1
Jun				2			2
Aug		2		1			3
Sep					1		1
Oct			1				1
Nov		1					1
Dec	1		2	1			4
Grand Total	**1**	**3**	**4**	**6**	**5**	**2**	**21**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon				1	4		5
Tue				1			1
Thu	1			1		1	3
Fri					1	1	2
Sat		2	3	3			8
Sun		1	1				2
Grand Total	**1**	**3**	**4**	**6**	**5**	**2**	**21**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am					4		4
2am-2.59am				1			1
4am-4.59am					1		1
8am-8.59am				1			1
10am-10.59am					1		1
1pm-1.59pm			2				2
5pm-5.59pm					1		1
6pm-6.59pm					1	1	2
7pm-7.59pm	1				1		2
8pm-8.59pm					1		1
10pm-10.59pm			1		1		2
11pm-11.59pm				2		1	3
Grand Total	**1**	**3**	**4**	**6**	**5**	**2**	**21**

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Police recorded alcohol-related harm in Manapouri

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
2	1	2		2	1	2	8
6		1	4	3	4		12
(blank)				1			1
Grand Total	**1**	**3**	**4**	**6**	**5**	**2**	**21**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
In Transit			2		1		3
Public Space	1	2	1	3			7
Residential		1	1	3	4	2	11
Grand Total	**1**	**3**	**4**	**6**	**5**	**2**	**21**

Police recorded alcohol-related harm in outdoor public places, in Manapouri

Division	2020 (Jul-Dec)	2021	2022	2023	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A		2			2
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION				1	1
TRAFFIC AND VEHICLE REGULATORY OFFENCES			1		1
UNKNOWN ANZSOC DIVISION	1			2	3
Grand Total	**1**	**2**	**1**	**3**	**7**

Month	2020 (Jul-Dec)	2021	2022	2023	Grand Total
Mar				1	1
Aug		2		1	3
Oct			1		1
Dec	1			1	2
Grand Total	**1**	**2**	**1**	**3**	**7**

Day	2020 (Jul-Dec)	2021	2022	2023	Grand Total
Thu	1			1	2
Sat		2		2	4
Sun			1		1
Grand Total	**1**	**2**	**1**	**3**	**7**

Start time	2020 (Jul-Dec)	2021	2022	2023	Grand Total
8am-8.59am			1		1
1pm-1.59pm		2			2
6pm-6.59pm				1	1
7pm-7.59pm	1				1
8pm-8.59pm				1	1
10pm-10.59pm				1	1
Grand Total	**1**	**2**	**1**	**3**	**7**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	Grand Total
2	1	2			3
6			1	2	3
(blank)				1	1
Grand Total	**1**	**2**	**1**	**3**	**7**

129

Drink driving in Manapouri

Division	2022	2024	Grand Total
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	1	2
Grand Total	**1**	**1**	**2**

Month	2022	2024	Grand Total
Sep		1	1
Oct	1		1
Grand Total	**1**	**1**	**2**

Day	2022	2024	Grand Total
Fri		1	1
Sun	1		1
Grand Total	**1**	**1**	**2**

Start time	2022	2024	Grand Total
8am-8.59am	1		1
10am-10.59am		1	1
Grand Total	**1**	**1**	**2**

NZ Deprivation Index 2023	2022	2024	Grand Total
2		1	1
6	1		1
Grand Total	**1**	**1**	**2**

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Police recorded alcohol-related family harm, in Manapouri

Statistical Area 2	2021	2022	2023	2025 (Jan-May)	Grand Total
Mararoa	1	3	4	1	9
Grand Total	**1**	**3**	**4**	**1**	**9**

Division	2021	2022	2023	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY	1	1	1		3
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		1			1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION			1		1
UNKNOWN ANZSOC DIVISION		1	2	1	4
Grand Total	**1**	**3**	**4**	**1**	**9**

Month	2021	2022	2023	2025 (Jan-May)	Grand Total
Jan		1			1
Mar			1		1
Apr				1	1
Jun			2		2
Aug			1		1
Nov	1				1
Dec		2			2
Grand Total	**1**	**3**	**4**	**1**	**9**

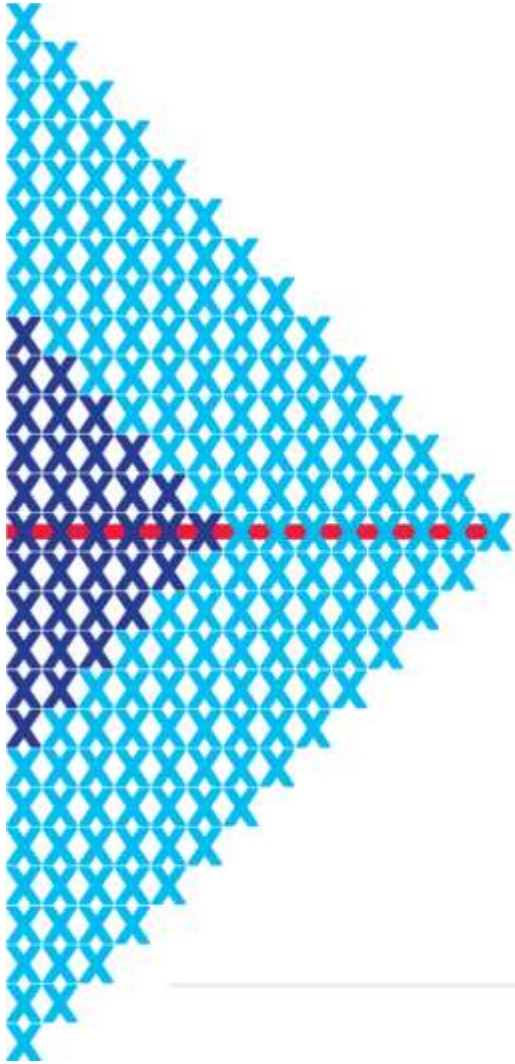
Start time	2021	2022	2023	2025 (Jan-May)	Grand Total
2am-2.59am		1			1
4am-4.59am			1		1
5pm-5.59pm			1		1
6pm-6.59pm			1		1
7pm-7.59pm			1		1
10pm-10.59pm	1				1
11pm-11.59pm		2		1	3
Grand Total	**1**	**3**	**4**	**1**	**9**

Day	2021	2022	2023	2025 (Jan-May)	Grand Total
Mon			1		1
Tue			1		1
Thu				1	1
Sat		3	2		5
Sun	1				1
Grand Total	**1**	**3**	**4**	**1**	**9**

NZ Deprivation Index 2023	2021	2022	2023	2025 (Jan-May)	Grand Total
2			2	1	3
6	1	3	2		6
Grand Total	**1**	**3**	**4**	**1**	**9**

Scene type	2021	2022	2023	2025 (Jan-May)	Grand Total
In Transit		2			2
Public Space			1		1
Residential	1	1	3	1	6
Grand Total	**1**	**3**	**4**	**1**	**9**

131

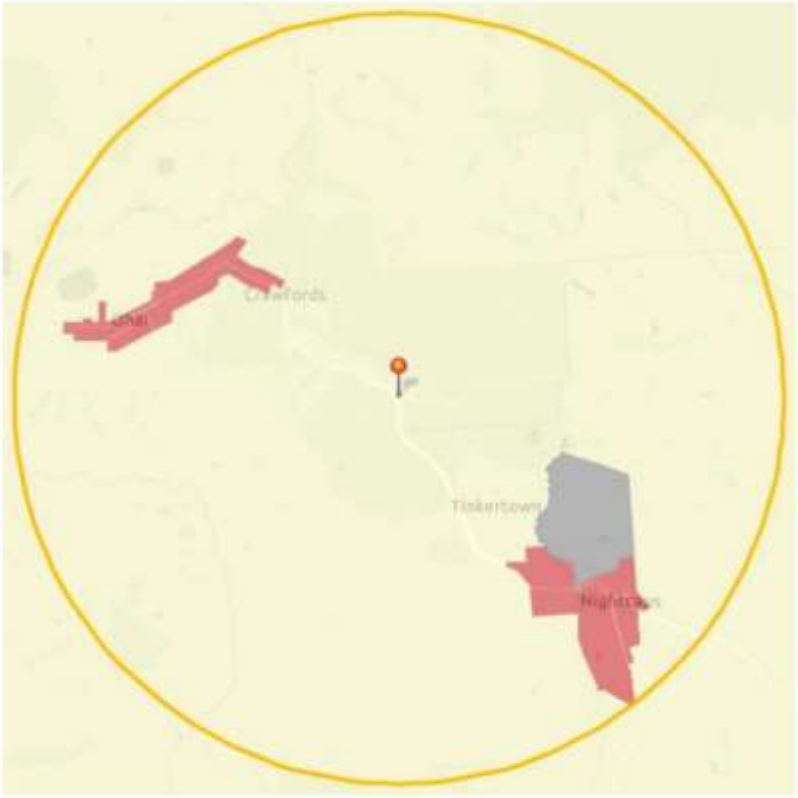


Nightcap/Ohai

Within 5km of 228 Nightcaps Ohai Highway

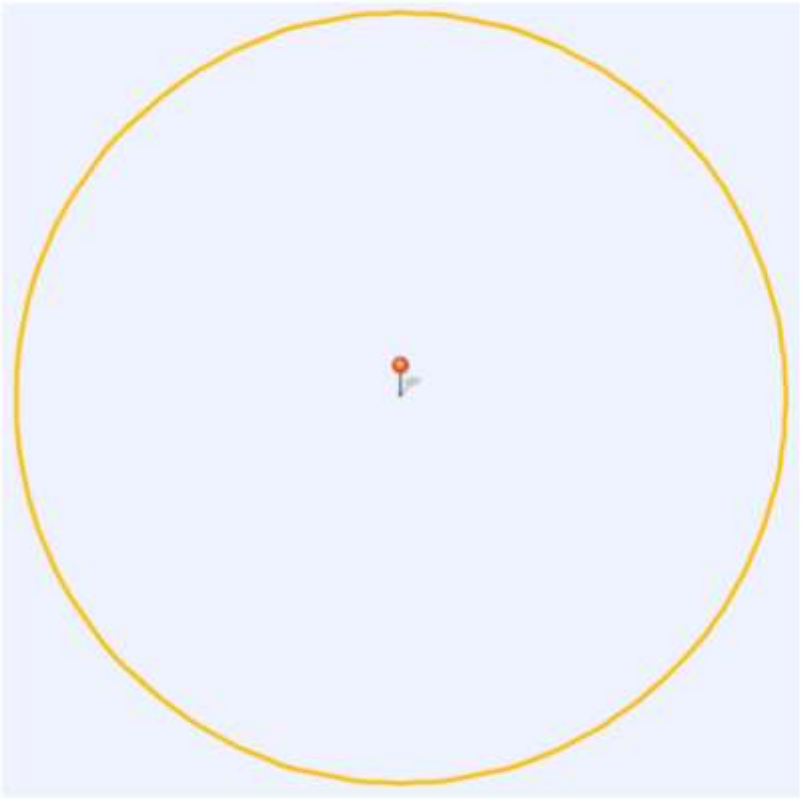
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

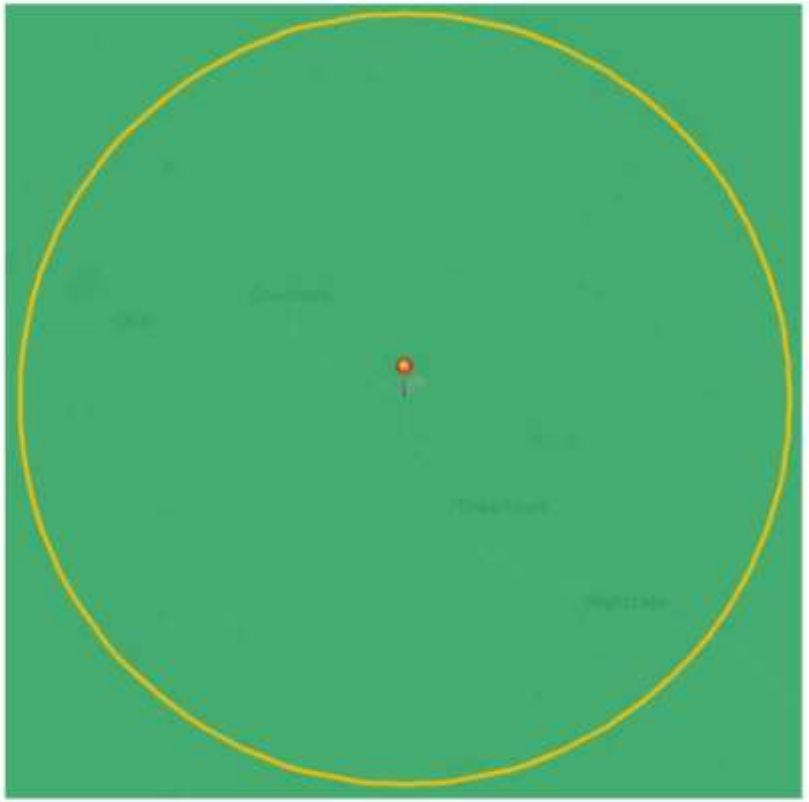
NZ Deprivation Index 2023 and alcohol ban area/s in Nightcaps/Ohai



133

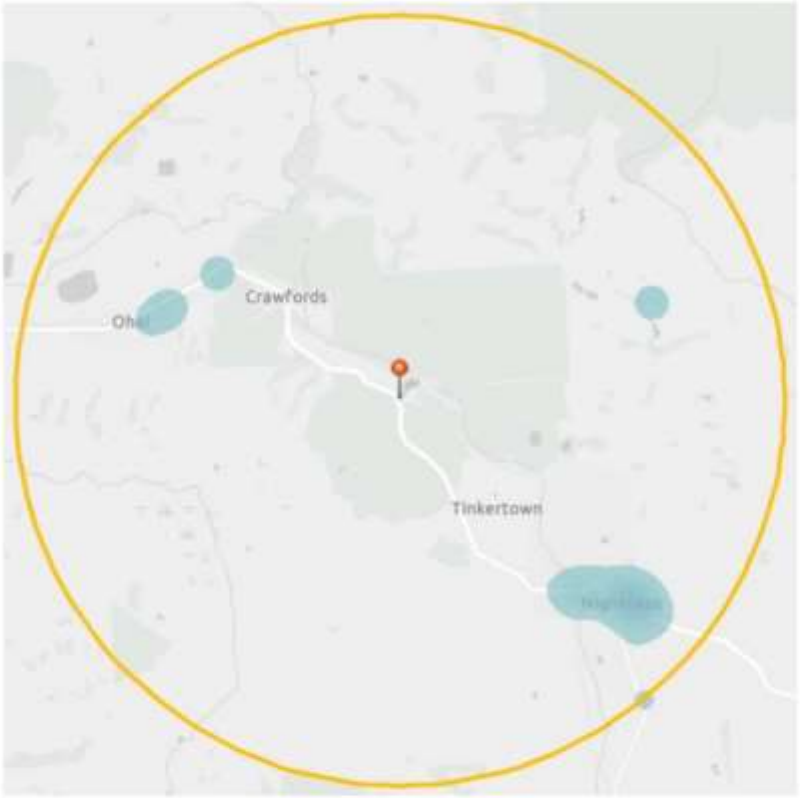
Sum of NZ Crime Harm Index scores – Nightcaps/Ohai





134

Police recorded alcohol-related harm in Nightcaps/Ohai



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Ōhai-Nightcaps	3	18	25	12	17	4	79
Grand Total	**3**	**18**	**25**	**12**	**17**	**4**	**79**

Police recorded alcohol-related harm in Nightcaps/Ohai

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		2	2	1			5
ACTS INTENDED TO CAUSE INJURY	1		3	1			5
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		2			1		3
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		1					1
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES		2					2
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION			2	1			3
PUBLIC ORDER OFFENCES			1				1
TRAFFIC AND VEHICLE REGULATORY OFFENCES		9	8	2	7	4	30
UNKNOWN ANZSOC DIVISION	2	2	9	7	9		29
Grand Total	**3**	**18**	**25**	**12**	**17**	**4**	**79**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2	4	1	2	1	10
Feb			3	1	1	2	7
Mar			1	3			4
Apr		3	1		2	1	7
May		1	2		1		4
Jul	2	2	2	1	2		9
Aug			6	2	2		10
Sep		2	2	4			8
Oct		2					2
Nov		3	2		4		9
Dec	1	3	2		3		9
Grand Total	**3**	**18**	**25**	**12**	**17**	**4**	**79**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			1	4	1		6
Tue	2	2	4	1	2		11
Wed		2	3	2			7
Thu	1	4	6	2	2	2	17
Fri		4	2	2	4		12
Sat		2	7		4	2	15
Sun		4	2	1	4		11
Grand Total	**3**	**18**	**25**	**12**	**17**	**4**	**79**

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Police recorded alcohol-related harm in Nightcaps/Ohai

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am			3				3
1am-1.59am	1		3	2			6
2am-2.59am			1	1			2
3am-3.59am			1				1
8am-8.59am					1		1
10am-10.59am			1	4			5
12pm-12.59pm			1				1
2pm-2.59pm		2	1				3
3pm-3.59pm		2	3	1	3		9
4pm-4.59pm			1	1	1		3
5pm-5.59pm		5		1	1		7
6pm-6.59pm				1	2		3
7pm-7.59pm		1			3	1	5
8pm-8.59pm		1	3		3	1	8
9pm-9.59pm	2	3	1		3		9
10pm-10.59pm			1				1
11pm-11.59pm		4	5	1		2	12
Grand Total	**3**	**18**	**25**	**12**	**17**	**4**	**79**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5		3					3
6		2	9				11
9	1	1	4	3	6	2	17
10	2	12	12	9	11	2	48
Grand Total	**3**	**18**	**25**	**12**	**17**	**4**	**79**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Health				1			1
In Transit				2			2
Public Space		11	7	2	12	4	36
Residential	3	7	18	6	5		39
Unknown				1			1
Grand Total	**3**	**18**	**25**	**12**	**17**	**4**	**79**

137

Police recorded alcohol-related harm in outdoor public places, in Nightcaps/Ohai

Division	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY			1			1
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	2			1		3
TRAFFIC AND VEHICLE REGULATORY OFFENCES	9	7	1	7	4	28
UNKNOWN ANZSOC DIVISION				4		4
Grand Total	**11**	**7**	**2**	**12**	**4**	**36**

Month	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2		2	1	5
Feb		2		1	2	5
Mar		1				1
Apr		1			1	2
May	1	1				2
Jul	2		1	1		4
Aug				1		1
Sep	1		1			2
Oct	2					2
Nov	2			4		6
Dec	3			3		6
Grand Total	**11**	**7**	**2**	**12**	**4**	**36**

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Police recorded alcohol-related harm in outdoor public places, in Nightcaps/Ohai

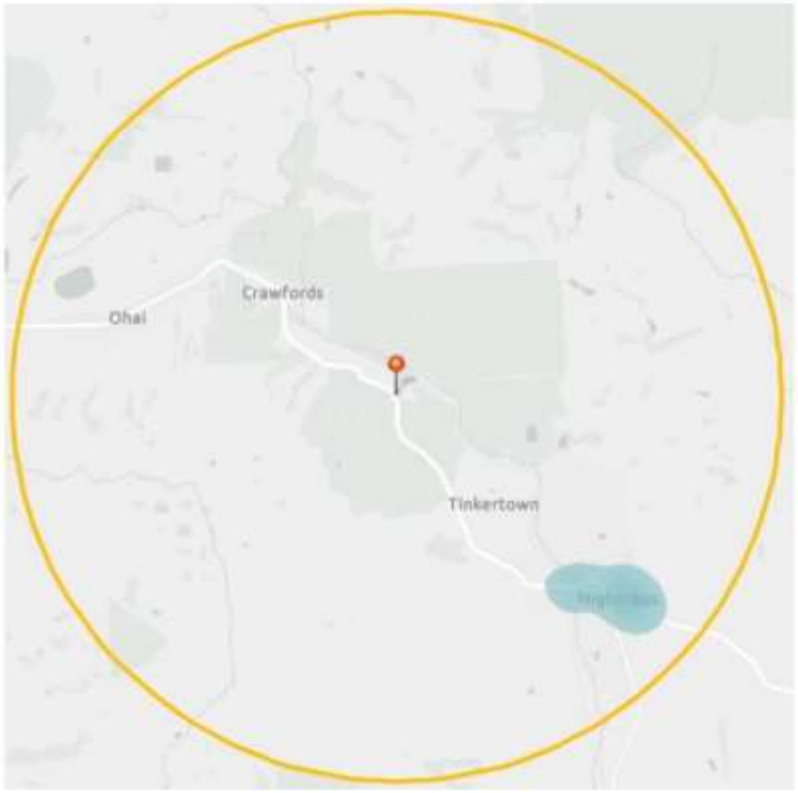
Start time	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
2am-2.59am		1	1			2
2pm-2.49pm	2					2
3pm-3.59pm	2	2	1	2		7
4pm-4.59pm		1		1		2
5pm-5.59pm	4			1		5
6pm-6.59pm				1		1
7pm-7.59pm	1			2	1	4
8pm-8.59pm		1		2	1	4
9pm-9.59pm	2	1		3		6
10pm-10.59pm		1				1
11pm-11.59pm					2	2
Grand Total	**11**	**7**	**2**	**12**	**4**	**36**

Day	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		1				1
Tue		2		2		4
Wed	2					2
Thu	3		1		2	6
Fri	2	2		3		7
Sat		2		3	2	7
Sun	4		1	4		9
Grand Total	**11**	**7**	**2**	**12**	**4**	**36**

NZ Deprivation Index 2023	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5	3					3
6	2	4				6
9		2	1	6	2	11
10	6	1	1	6	2	16
Grand Total	**11**	**7**	**2**	**12**	**4**	**36**

139

Drink driving in Nightcaps/Ohai



Division	2021	2022	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS			1		1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	6	7	7	4	24
Grand Total	**6**	**7**	**8**	**4**	**25**

Month	2021	2022	2024	2025 (Jan-May)	Grand Total
Jan		2	2	1	5
Feb		1	1	2	4
Mar		1			1
Apr		1		1	2
May	1	1			2
Jul	1				1
Aug			1		1
Sep	1				1
Oct	1				1
Nov	1	1	2		4
Dec	1		2		3
Grand Total	**6**	**7**	**8**	**4**	**25**

Day	2021	2022	2024	2025 (Jan-May)	Grand Total
Mon		1			1
Tue		1			1
Wed	1	1			2
Thu	1			2	3
Fri	2	2	2		6
Sat		2	2	2	6
Sun	2		4		6
Grand Total	**6**	**7**	**8**	**4**	**25**

140

Drink driving in Nightcaps/Ohai

Start time	2021	2022	2024	2025 (Jan-May)	Grand Total
2am-2.59am		1			1
2pm-2.49pm	1	1			2
3pm-3.59pm	1	1	2		4
4pm-4.59pm		1	1		2
5pm-5.59pm	2		1		3
7pm-7.59pm	1		1	1	3
8pm-8.59pm		1	2	1	4
9pm-9.59pm	1	1	1		3
10pm-10.59pm		1			1
11pm-11.59pm				2	2
Grand Total	**6**	**7**	**8**	**4**	**25**

NZ Deprivation Index 2023	2021	2022	2024	2025 (Jan-May)	Grand Total
5	1				1
6	1	3			4
9		2	5	2	9
10	4	2	3	2	11
Grand Total	**6**	**7**	**8**	**4**	**25**

141

Police recorded alcohol-related family harm, in Nightcaps/Ohai

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Ōhai-Nightcaps	3	4	15	7	4	33
Grand Total	**3**	**4**	**15**	**7**	**4**	**33**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Jan			2			2
Feb			1	1		2
Mar				3		3
Apr		2			1	3
May			1		1	2
Jul	2		2	1	1	6
Aug			6		1	7
Sep		1	2	2		5
Nov		1				1
Dec	1		1			2
Grand Total	**3**	**4**	**15**	**7**	**4**	**33**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Mon				4	1	5
Tue	2		1	1		4
Wed			1	1		2
Thu	1	1	6		2	10
Fri		1				1
Sat		2	5		1	8
Sun			2	1		3
Grand Total	**3**	**4**	**15**	**7**	**4**	**33**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		2	2			4
ACTS INTENDED TO CAUSE INJURY	1		2	1		4
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES		1				1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION			2	1		3
PUBLIC ORDER OFFENCES			1			1
TRAFFIC AND VEHICLE REGULATORY OFFENCES				1		1
UNKNOWN ANZSOC DIVISION	2	1	8	4	4	19
Grand Total	**3**	**4**	**15**	**7**	**4**	**33**

Police recorded alcohol-related family harm, in Nightcaps/Ohai

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
12am-12.59am			3			3
1am-1.59am	1		2	1		4
2am-2.59am				1		1
3am-3.59am			1			1
10am-10.59am			1	2		3
12pm-12.59pm			1			1
3pm-3.59pm					1	1
4pm-4.59pm				1		1
5pm-5.59pm		1				1
6pm-6.59pm				1	1	2
7pm-7.59pm					1	1
8pm-8.59pm		1	2		1	4
9pm-9.59pm	2					2
11pm-11.59pm		2	5	1		8
Grand Total	**3**	**4**	**15**	**7**	**4**	**33**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
6			5			5
9	1	1	2	1		5
10	2	3	8	6	4	23
Grand Total	**3**	**4**	**15**	**7**	**4**	**33**

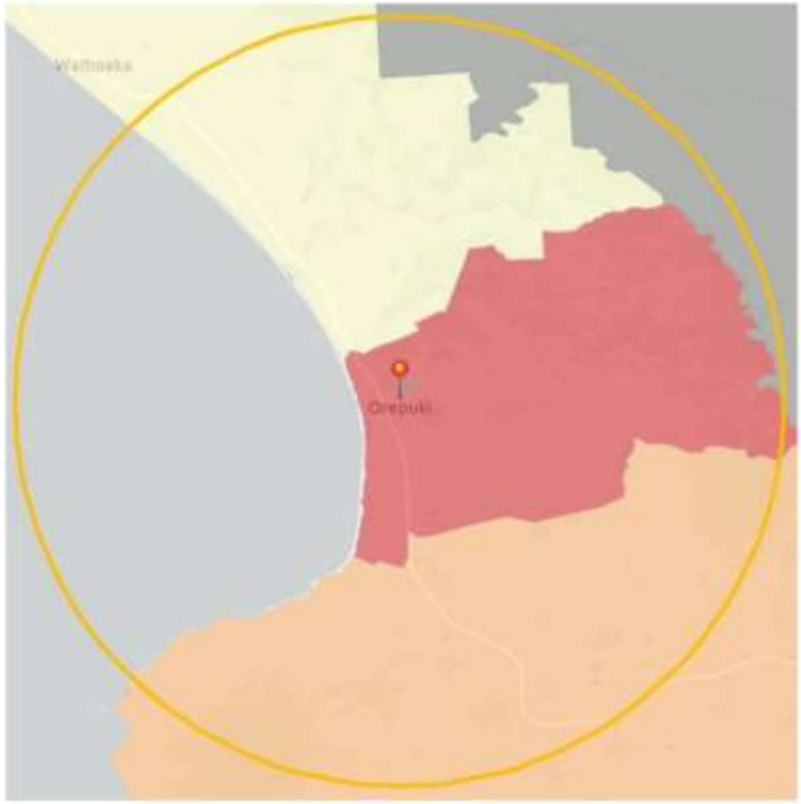
Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
In Transit				2		2
Public Space				1		1
Residential	3	4	15	4	4	30
Grand Total	**3**	**4**	**15**	**7**	**4**	**33**

Orepuki

Within 5km of the intersection of Truro and Dover Streets

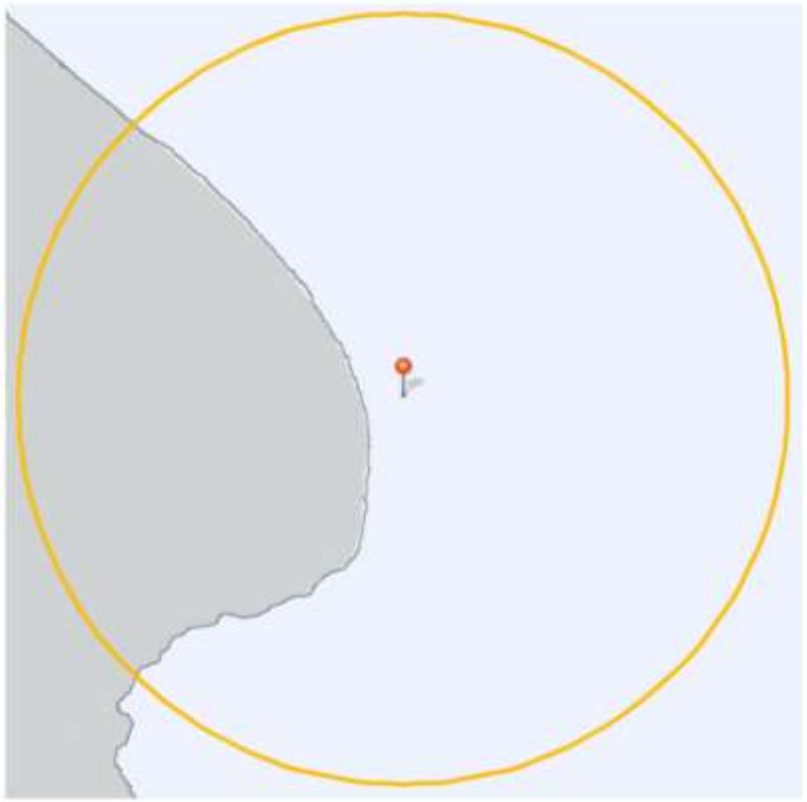
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

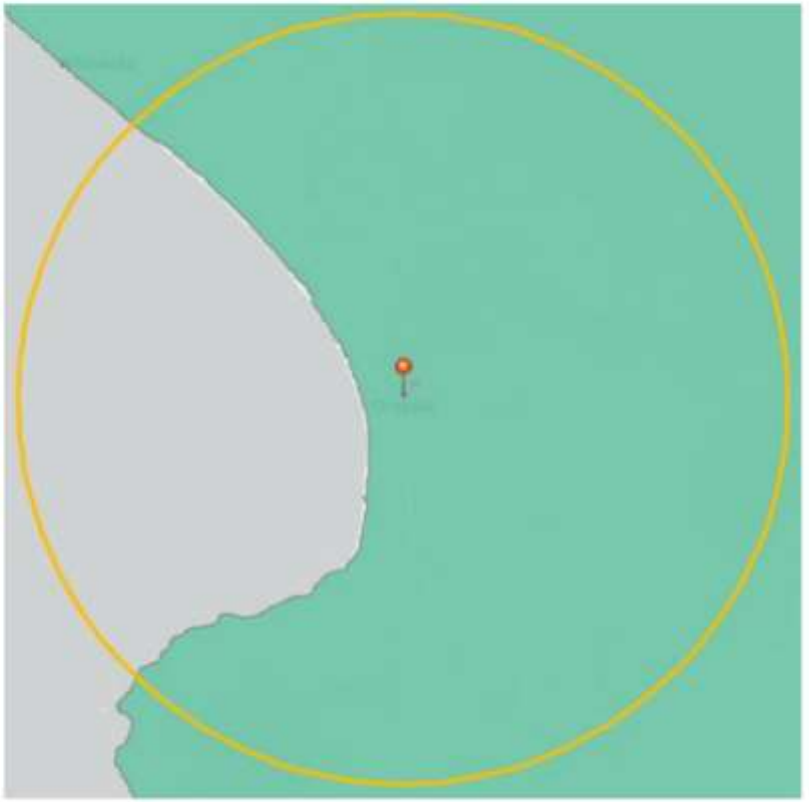
NZ Deprivation Index 2023 and alcohol ban area/s in Orepuki



145

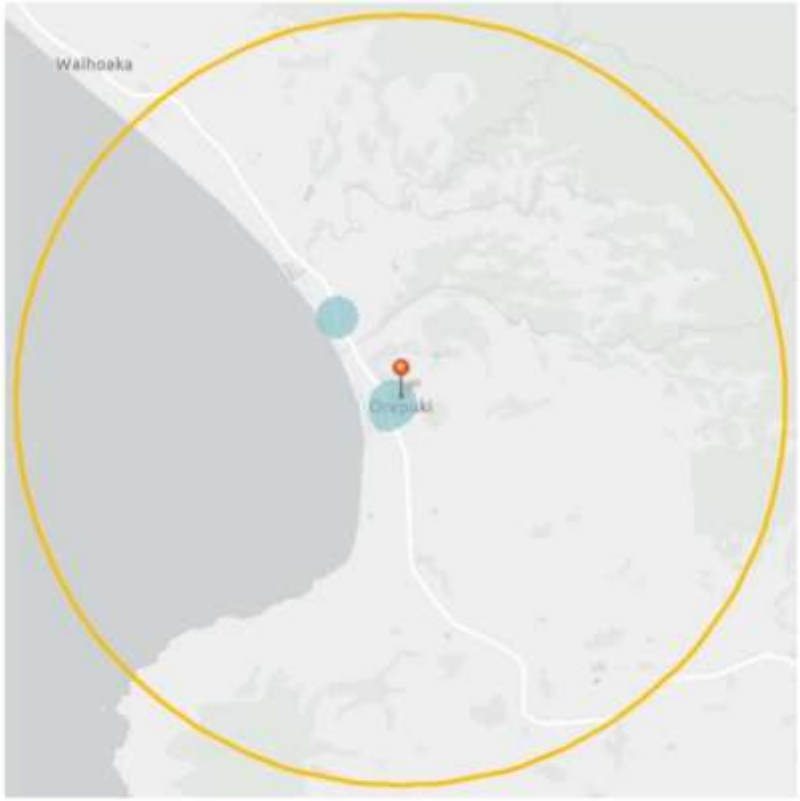
Sum of NZ Crime Harm Index scores – Orepuki





146

Police recorded alcohol-related harm in Orepuki



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Longwood Forest	1	7	9	4	9	2	32
Grand Total	**1**	**7**	**9**	**4**	**9**	**2**	**32**

147

Police recorded alcohol-related harm in Orepuki

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY			3	2	3	2	10
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		2					2
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS					2		2
PUBLIC ORDER OFFENCES				1			1
THEFT AND RELATED OFFENCES			1		1		2
TRAFFIC AND VEHICLE REGULATORY OFFENCES		2	1				3
UNKNOWN ANZSOC DIVISION		3	4	1	2		10
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER	1				1		2
Grand Total	**1**	**7**	**9**	**4**	**9**	**2**	**32**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan			1				1
Mar			1		1	1	3
Apr		1	2				3
May			2		1	1	4
Jun					1		1
Jul		1	1	2	1		5
Aug		4					4
Sep			1	1			2
Oct	1				1		2
Nov			1		3		4
Dec		1		1	1		3
Grand Total	**1**	**7**	**9**	**4**	**9**	**2**	**32**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	1					2
Tue		4		1			5
Wed				2	4		6
Thu		1	2				3
Fri				1	2		3
Sat		1	2		2	2	7
Sun			5		1		6
Grand Total	**1**	**7**	**9**	**4**	**9**	**2**	**32**

148

Police recorded alcohol-related harm in Orepuki

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am						1	1
1am-1.59am			2				2
2am-2.59am		2					2
3am-3.59am			1				1
4am-4.59am			1				1
5am-5.59am	1						1
8am-8.59am					1		1
1pm-1.59pm		1			3		4
2pm-2.59pm			1		1		2
3pm-3.59pm						1	1
4pm-4.59pm		4					4
6pm-6.59pm			1	1			2
7pm-7.59pm			1				1
8pm-8.59pm				2	2		4
9pm-9.59pm			2		1		3
10pm-10.59pm				1	1		2
Grand Total	**1**	**7**	**9**	**4**	**9**	**2**	**32**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5		4					4
8			1		1		2
9	1	3	8	4	8	2	26
Grand Total	**1**	**7**	**9**	**4**	**9**	**2**	**32**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial			1	2			3
Public Space		4	1	1	2	1	9
Residential	1	3	7	1	7	1	20
Grand Total	**1**	**7**	**9**	**4**	**9**	**2**	**32**

149

Police recorded alcohol-related harm in outdoor public places, in Orepuki

Division	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY					1	1
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	2					2
THEFT AND RELATED OFFENCES				1		1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	2	1				3
UNKNOWN ANZSOC DIVISION			1	1		2
Grand Total	**4**	**1**	**1**	**2**	**1**	**9**

Month	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
May					1	1
Jun				1		1
Jul		1				1
Aug	4					4
Dec			1	1		2
Grand Total	**4**	**1**	**1**	**2**	**1**	**9**

Day	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Tue	4		1			5
Fri				2		2
Sat					1	1
Sun		1				1
Grand Total	**4**	**1**	**1**	**2**	**1**	**9**

150

Police recorded alcohol-related harm in outdoor public places, in Orepuki

Start time	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am					1	1
4am-4.59am		1				1
4pm-4.59pm	4					4
8pm-8.59pm				1		1
9pm-9.59pm				1		1
10pm-10.59pm			1			1
Grand Total	**4**	**1**	**1**	**2**	**1**	**9**

NZ Deprivation Index 2023	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5	4					4
8		1		1		2
9			1	1	1	3
Grand Total	**4**	**1**	**1**	**2**	**1**	**9**

151

Drink driving in Orepuki

Division	2021	2022	2024	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	1			1
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1	1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	1		2
Grand Total	**2**	**1**	**1**	**4**

Month	2021	2022	2024	Grand Total
Jul		1		1
Aug	1			1
Nov			1	1
Grand Total	**1**	**1**	**1**	**3**

Day	2021	2022	2024	Grand Total
Tue	1			1
Wed			1	1
Sun		1		1
Grand Total	**1**	**1**	**1**	**3**

Start time	2021	2022	2024	Grand Total
4am-4.59am		1		1
1pm-1.59pm			1	1
4pm-4.59pm	1			1
Grand Total	**1**	**1**	**1**	**3**

NZ Deprivation Index 2023	2021	2022	2024	Grand Total
5	1			1
8		1		1
9			1	1
Grand Total	**1**	**1**	**1**	**3**

152

Police recorded alcohol-related family harm, in Orepuki

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Longwood Forest	1	2	7	2	6	1	19
Grand Total	**1**	**2**	**7**	**2**	**6**	**1**	**19**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan			1				1
Mar			1			1	2
Apr		1	2				3
May			2		1		3
Jun					1		1
Jul		1			1		2
Sep			1	1			2
Oct	1						1
Nov					3		3
Dec				1			1
Grand Total	**1**	**2**	**7**	**2**	**6**	**1**	**19**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	1					2
Tue				1			1
Wed					4		4
Thu			1				1
Fri				1	1		2
Sat		1	2		1	1	5
Sun			4				4
Grand Total	**1**	**2**	**7**	**2**	**6**	**1**	**19**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY			3	1	2	1	7
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS					2		2
UNKNOWN ANZSOC DIVISION		2	4	1	1		8
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER	1				1		2
Grand Total	**1**	**2**	**7**	**2**	**6**	**1**	**19**

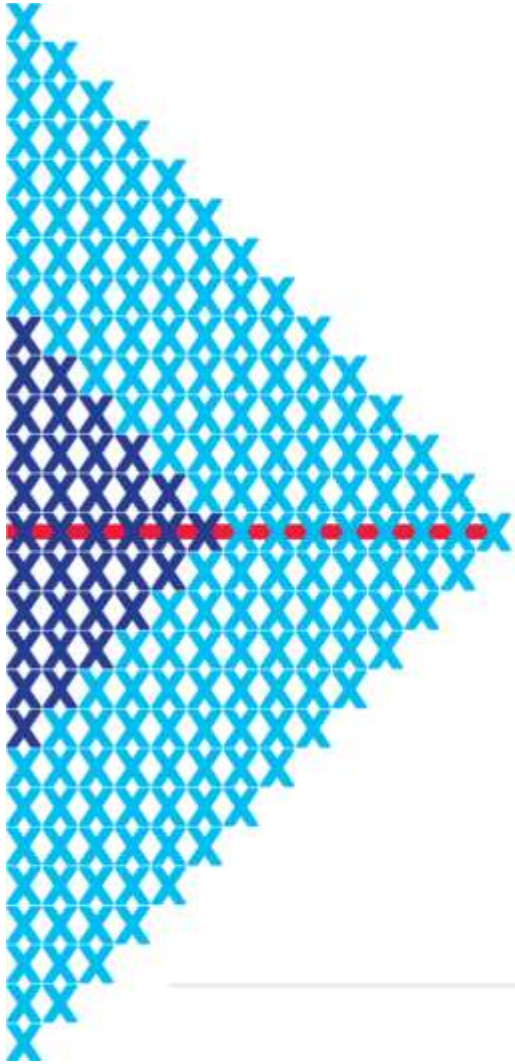
153

Police recorded alcohol-related family harm, in Orepuki

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1am-1.59am			2				2
2am-2.59am		1					1
3am-3.59am			1				1
5am-5.59am	1						1
1pm-1.59pm		1			3		4
2pm-2.49pm					1		1
3pm-3.59pm						1	1
6pm-6.59pm			1	1			2
7pm-7.59pm			1				1
8pm-8.59pm					1		1
9pm-9.59pm			2				2
10pm-10.59pm				1	1		2
Grand Total	**1**	**2**	**7**	**2**	**6**	**1**	**19**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
9	1	2	7	2	6	1	19
Grand Total	**1**	**2**	**7**	**2**	**6**	**1**	**19**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial			1				1
Public Space				1	1		2
Residential	1	2	6	1	5	1	16
Grand Total	**1**	**2**	**7**	**2**	**6**	**1**	**19**

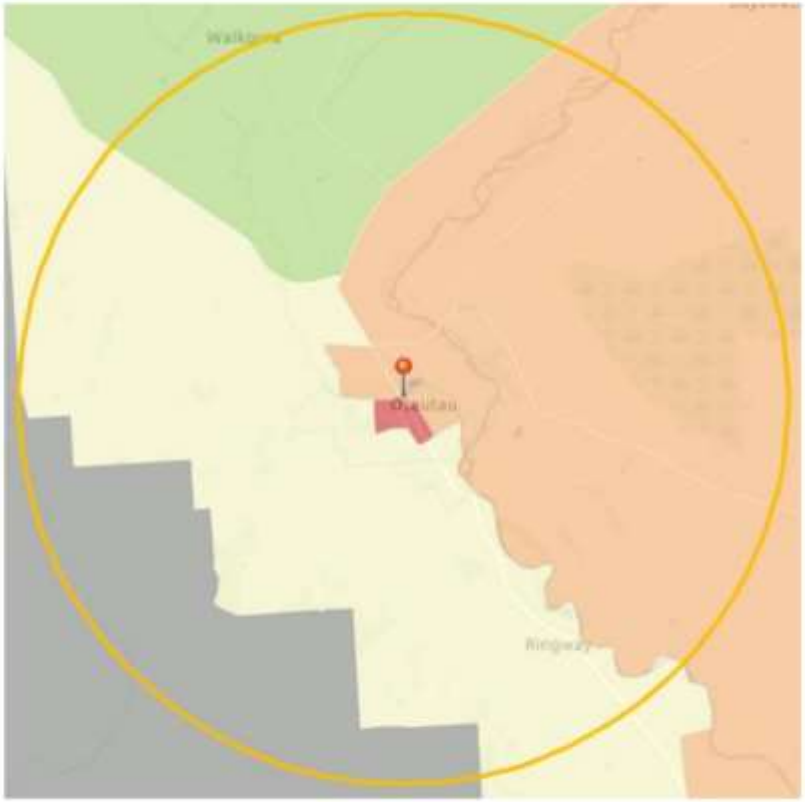


Otautau

Within 5km of 190a Main Street

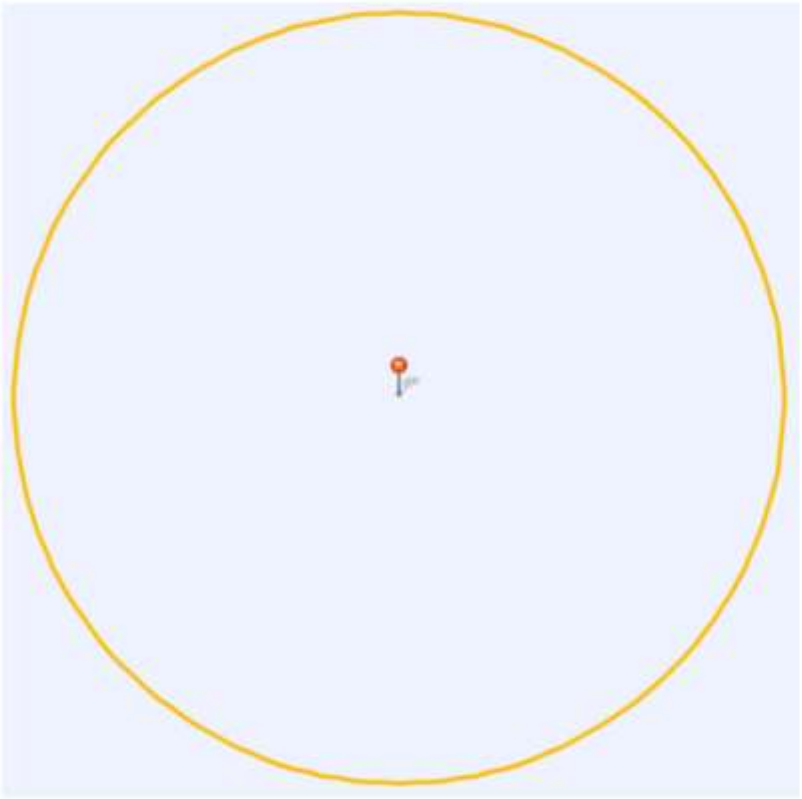
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

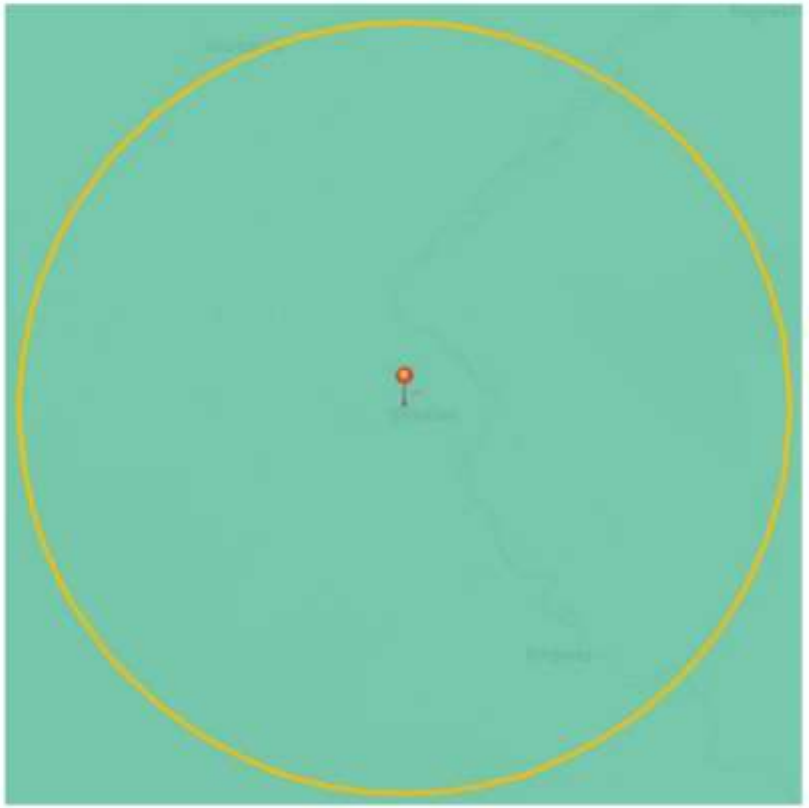
NZ Deprivation Index 2023 and alcohol ban area/s in Otautau



156

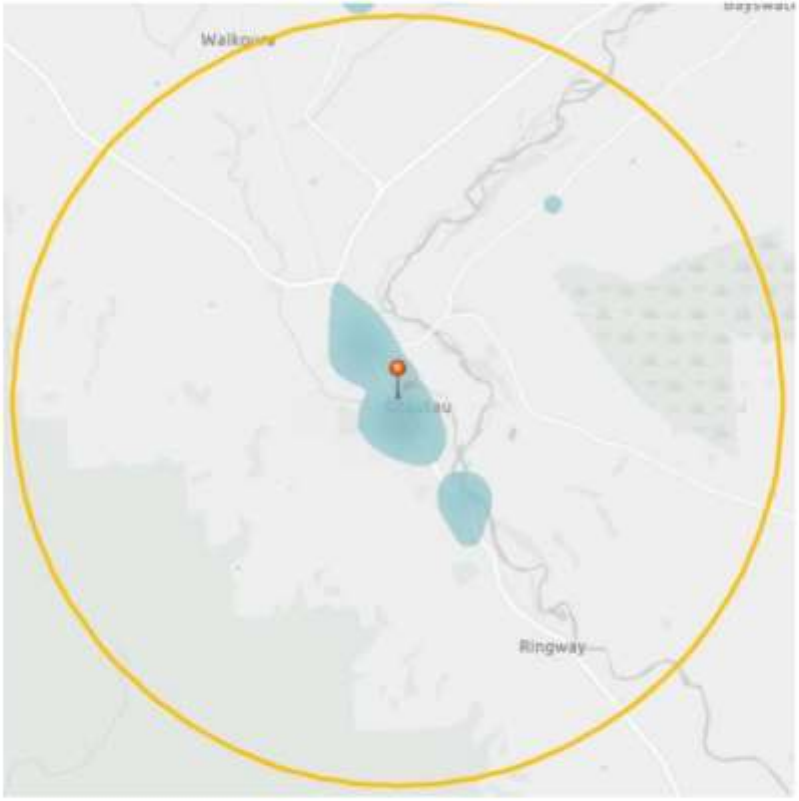
Sum of NZ Crime Harm Index scores – Otautau





157

Police recorded alcohol-related harm in Otautau



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Ōtautau	10	25	21	16	12	12	96
Grand Total	**10**	**25**	**21**	**16**	**12**	**12**	**96**

158

Police recorded alcohol-related harm in Otautau

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON				2			2
ACTS INTENDED TO CAUSE INJURY		2	1	3	1	2	9
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS			1		2		3
ILLICIT DRUG OFFENCES					1		1
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		1		1			2
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1	3	1	1		6
PUBLIC ORDER OFFENCES	1	2	3				6
SEXUAL ASSAULT AND RELATED OFFENCES			1	1			2
THEFT AND RELATED OFFENCES		1				1	2
TRAFFIC AND VEHICLE REGULATORY OFFENCES	6	5	6	4	5	6	32
UNKNOWN ANZSOC DIVISION	3	13	4	4	2	3	29
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER			2				2
Grand Total	**10**	**25**	**21**	**16**	**12**	**12**	**96**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		3	2	1	1	1	8
Feb		2	2	1	4	2	11
Mar		1	6		3	3	13
Apr		5		3		3	11
May		1	6	1	1	3	12
Jun		2			1		3
Jul	2			2			4
Aug	1	2	1	2			6
Sep	2	1		2			5
Oct	1	4	1	1	1		8
Nov	1	1					2
Dec	3	3	3	3	1		13
Grand Total	**10**	**25**	**21**	**16**	**12**	**12**	**96**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	2	1	3	2	2	11
Tue	2	2		1			5
Thu		1	5	1		1	8
Fri	3	9	1	2	4	4	23
Sat	3	6	13	6	2	3	33
Sun	1	5	1	3	4	2	16
Grand Total	**10**	**25**	**21**	**16**	**12**	**12**	**96**

159

Police recorded alcohol-related harm in Otautau

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am		2					2
1am-1.59am	1	1		1		1	4
2am-2.59am		1		3			4
3am-3.59am		1					1
4am-4.59am	1	1					2
7am-7.59am		1					1
10am-10.59am				1		1	2
11am-11.59am			1			1	2
12pm-12.59pm		1					1
3pm-3.59pm		2				1	3
4pm-4.59pm		1	4	1			6
5pm-5.59pm			2			1	3
6pm-6.59pm	1	1	3	1	5		11
7pm-7.59pm		1	3	4		1	9
8pm-8.59pm	2	5	2	3	2		14
9pm-9.59pm	1		2	1	1	1	6
10pm-10.59pm	2	4	4		1	4	15
11pm-11.59pm	2	3		1	3	1	10
Grand Total	**10**	**25**	**21**	**16**	**12**	**12**	**96**

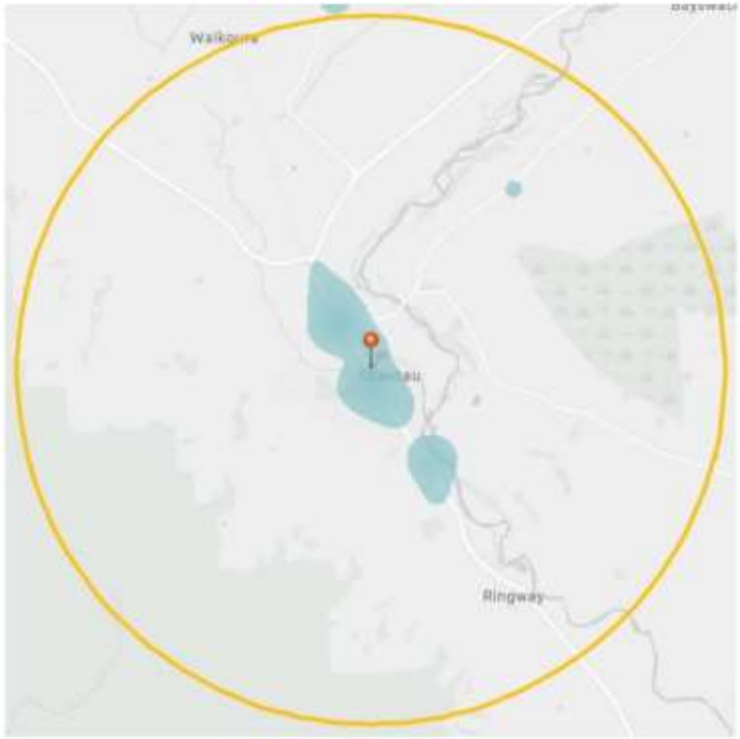
NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
4				1			1
5	1	4	5	9	1	3	23
6			2			1	3
7	1	3	2	1	4	2	13
8	5	12	2	3	5	3	30
9	3	6	10	2	2	3	26
Grand Total	**10**	**25**	**21**	**16**	**12**	**12**	**96**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial		1	1		2		4
Community			1				1
Not Applicable			1				1
Online				1			1
Public Space	6	10	12	6	7	8	49
Residential	4	14	6	9	3	3	39
Retail						1	1
Grand Total	**10**	**25**	**21**	**16**	**12**	**12**	**96**

160

Police recorded alcohol-related harm in outdoor public places, in Otautau

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1		1	1	1	4
Feb		1	1		3	1	6
Mar			6			2	8
Apr						1	1
May			2		1	3	6
Jun		1					1
Jul	1			1			2
Aug				1			1
Sep	2	1		1			4
Oct	1	4	1		1		7
Nov		1					1
Dec	2	1	2	2	1		8
Grand Total	**6**	**10**	**12**	**6**	**7**	**8**	**49**



Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS			1		1		2
ILLICIT DRUG OFFENCES					1		1
PUBLIC ORDER OFFENCES			3				3
THEFT AND RELATED OFFENCES		1					1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	6	5	6	4	5	6	32
UNKNOWN ANZSOC DIVISION		4	2	2		2	10
Grand Total	**6**	**10**	**12**	**6**	**7**	**8**	**49**

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Police recorded alcohol-related harm in outdoor public places, in Otautau

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	2		1		1	5
Thu			3			1	4
Fri	3	7		1	2	2	15
Sat	2	1	8	3	2	2	18
Sun			1	1	3	2	7
Grand Total	**6**	**10**	**12**	**6**	**7**	**8**	**49**

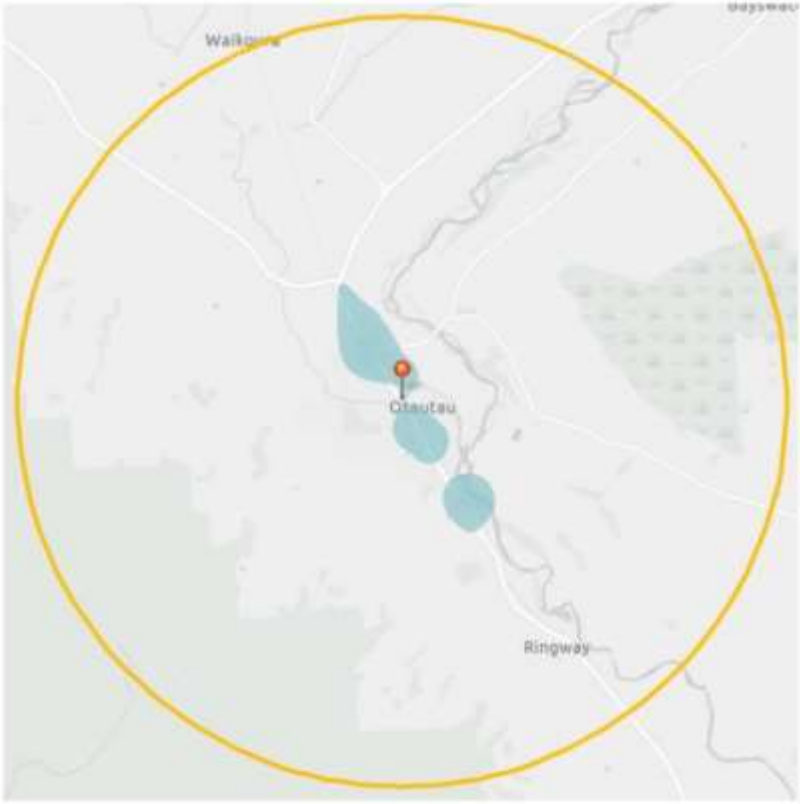
Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1am-1.59am	1			1		1	3
4am-4.59am		1					1
10am-10.59am				1		1	2
11am-11.59am						1	1
12pm-12.59pm		1					1
3pm-3.59pm		2					2
4pm-4.59pm		1	3				4
5pm-5.59pm						1	1
6pm-6.59pm			2		4		6
7pm-7.59pm			3	2			5
8pm-8.59pm	1	1	1	2			5
9pm-9.59pm						1	1
10pm-10.59pm	2	1	3		1	2	9
11pm-11.59pm	2	3			2	1	8
Grand Total	**6**	**10**	**12**	**6**	**7**	**8**	**49**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
4				1			1
5		1	4	3	1	2	11
6			2				2
7	1	3	1	1	2	1	9
8	3	4	2	1	4	3	17
9	2	2	3			2	9
Grand Total	**6**	**10**	**12**	**6**	**7**	**8**	**49**

Drink driving in Otautau

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1		1	1	1	4
Feb					1		1
Mar			1			2	3
Apr						1	1
May			1		1	2	4
Jul	1			1			2
Aug				1			1
Sep	1	1					2
Oct	1		1		1		3
Nov		1					1
Dec	1		2	1	1		5
Grand Total	**4**	**3**	**5**	**4**	**5**	**6**	**27**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1						1
Thu			1			1	2
Fri	2	2		1	2	2	9
Sat	1	1	4	2	2	2	12
Sun				1	1	1	3
Grand Total	**4**	**3**	**5**	**4**	**5**	**6**	**27**



Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS					1		1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	3	5	4	4	6	26
Grand Total	**4**	**3**	**5**	**4**	**5**	**6**	**27**

163

Drink driving in Otautau

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1am-1.59am	1			1			2
11am-11.59am						1	1
12pm-12.59pm		1					1
5pm-5.59pm						1	1
6pm-6.59pm			1		2		3
7pm-7.59pm			2	1			3
8pm-8.59pm	1	1		2			4
9pm-9.59pm						1	1
10pm-10.59pm	1	1	2		1	2	7
11pm-11.59pm	1				2	1	4
Grand Total	**4**	**3**	**5**	**4**	**5**	**6**	**27**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
4				1			1
5		1	2	2	1	2	8
6			1				1
7	1	1			2	1	5
8	2		2	1	2	3	10
9	1	1					2
Grand Total	**4**	**3**	**5**	**4**	**5**	**6**	**27**

Police recorded alcohol-related family harm, in Otautau

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Ōtautau	3	14	5	6	6	5	39
Grand Total	**3**	**14**	**5**	**6**	**6**	**5**	**39**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2					2
Feb		1	1	1	4	2	9
Mar		1	3		1		5
Apr		4		1		2	7
May		1				1	2
Jun		2			1		3
Jul	1			1			2
Aug		2	1	1			4
Sep				1			1
Oct				1			1
Nov	1						1
Dec	1	1					2
Grand Total	**3**	**14**	**5**	**6**	**6**	**5**	**39**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON				1			1
ACTS INTENDED TO CAUSE INJURY		2		3	1	2	8
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS					1		1
ILLICIT DRUG OFFENCES					1		1
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		1		1			2
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1	1				2
PUBLIC ORDER OFFENCES		2	2				4
SEXUAL ASSAULT AND RELATED OFFENCES			1				1
TRAFFIC AND VEHICLE REGULATORY OFFENCES					1		1
UNKNOWN ANZSOC DIVISION	3	8	1	1	2	3	18
Grand Total	**3**	**14**	**5**	**6**	**6**	**5**	**39**

165

Police recorded alcohol-related family harm, in Otautau

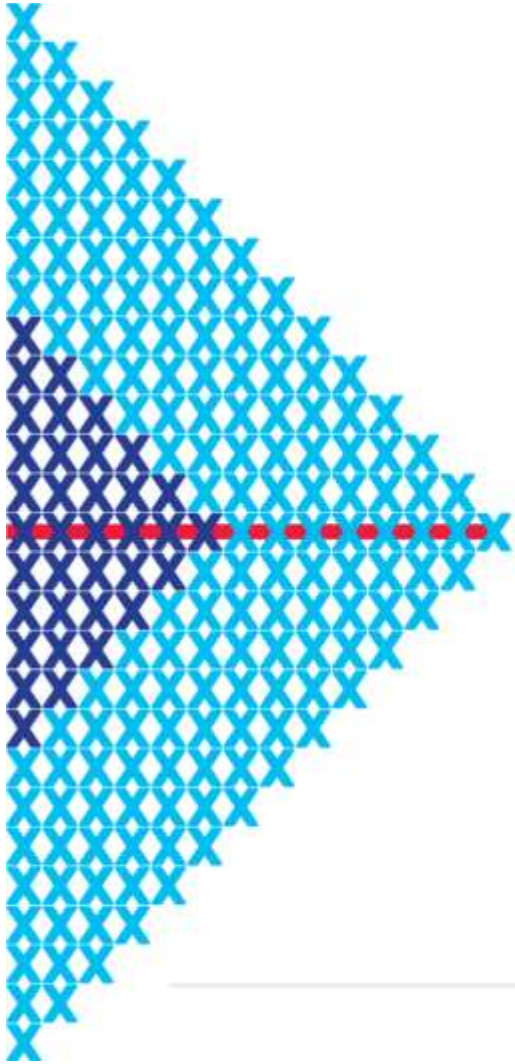
Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			1	1	2	2	6
Tue	2	1		1			4
Thu		1	1	1			3
Fri		3		1		2	6
Sat		5	3	2			10
Sun	1	4			4	1	10
Grand Total	**3**	**14**	**5**	**6**	**6**	**5**	**39**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5		3	1	4		1	9
6						1	1
7					2	1	3
8	2	8		2	4		16
9	1	3	4			2	10
Grand Total	**3**	**14**	**5**	**6**	**6**	**5**	**39**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am		2					2
1am-1.59am						1	1
2am-2.59am		1		1			2
3am-3.59am		1					1
4am-4.59am		1					1
7am-7.59am		1					1
10am-10.59am						1	1
11am-11.59am			1				1
4pm-4.59pm			3	1			4
6pm-6.59pm	1			1	4		6
7pm-7.59pm		1		1		1	3
8pm-8.59pm	1	4		1			6
9pm-9.59pm	1				1		2
10pm-10.59pm		3	1			2	6
11pm-11.59pm				1	1		2
Grand Total	**3**	**14**	**5**	**6**	**6**	**5**	**39**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial		1					1
Public Space		1	3		3	2	9
Residential	3	12	2	6	3	3	29
Grand Total	**3**	**14**	**5**	**6**	**6**	**5**	**39**

166



Rakiura/Stewart Island

Within 5km of 17 Main Raid

NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

NZ Deprivation Index 2023 and alcohol ban area/s in Rakiura/Stewart Island

168

Sum of NZ Crime Harm Index scores – Rakiura/Stewart Island

169

Police recorded alcohol-related harm in Rakiura/Stewart Island

Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Stewart Island	1	1	12	2	7	4	27
Grand Total	**1**	**1**	**12**	**2**	**7**	**4**	**27**

170

Police recorded alcohol-related harm in Rakiura/Stewart Island

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON			2				2
ACTS INTENDED TO CAUSE INJURY	1		4				5
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION				1			1
PUBLIC ORDER OFFENCES			1				1
SEXUAL ASSAULT AND RELATED OFFENCES				1			1
TRAFFIC AND VEHICLE REGULATORY OFFENCES			4		1	3	8
UNKNOWN ANZSOC DIVISION		1	1		6	1	9
Grand Total	**1**	**1**	**12**	**2**	**7**	**4**	**27**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan			1			1	2
Feb			1		1	1	3
Apr						1	1
May			2			1	3
Jun			1		1		2
Aug					3		3
Sep	1		2	1			4
Oct		1	4	1	1		7
Nov					1		1
Dec			1				1
Grand Total	**1**	**1**	**12**	**2**	**7**	**4**	**27**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon					2	1	3
Tue			1		1		2
Wed	1			1	1		3
Thu			3	1		1	5
Fri		1			1	2	4
Sat			2		1		3
Sun			6		1		7
Grand Total	**1**	**1**	**12**	**2**	**7**	**4**	**27**

171

Police recorded alcohol-related harm in Rakiura/Stewart Island

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am					1		1
1am-1.59am			3				3
3am-3.59am					1		1
4am-4.59am				1			1
5am-5.59am						1	1
3pm-3.59pm			3		1		4
4pm-4.59pm					1		1
5pm-5.59pm			1				1
6pm-6.59pm			2				2
7pm-7.59pm	1						1
9pm-9.59pm						2	2
10pm-10.59pm				1	3		4
11pm-11.59pm		1	3			1	5
Grand Total	**1**	**1**	**12**	**2**	**7**	**4**	**27**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
6	1		6	1		1	9
7		1	6	1	7	3	18
Grand Total	**1**	**1**	**12**	**2**	**7**	**4**	**27**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial				1			1
In Transit					1	2	3
Public Space			5			1	6
Residential	1	1	7	1	6	1	17
Grand Total	**1**	**1**	**12**	**2**	**7**	**4**	**27**

172

Police recorded alcohol-related harm in outdoor public places, in Rakiura/Stewart Island

Division	2022	2025 (Jan-May)	Grand Total
PUBLIC ORDER OFFENCES	1		1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	1	5
Grand Total	**5**	**1**	**6**

Month	2022	2025 (Jan-May)	Grand Total
Jan	1		1
Feb	1	1	2
May	2		2
Dec	1		1
Grand Total	**5**	**1**	**6**

Day	2022	2025 (Jan-May)	Grand Total
Tue	1		1
Thu	1		1
Fri		1	1
Sat	2		2
Sun	1		1
Grand Total	**5**	**1**	**6**

Start time	2022	2025 (Jan-May)	Grand Total
1am-1.59am	1		1
5pm-5.59pm	1		1
6pm-6.59pm	1		1
9pm-9.59pm		1	1
11pm-11.59pm	2		2
Grand Total	**5**	**1**	**6**

NZ Deprivation Index 2023	2022	2025 (Jan-May)	Grand Total
6	2		2
7	3	1	4
Grand Total	**5**	**1**	**6**

173

Drink driving in Rakiura/Stewart Island

Division	2022	2024	2025 (Jan-May)	Grand Total
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	1	3	8
Grand Total	**4**	**1**	**3**	**8**

Month	2022	2024	2025 (Jan-May)	Grand Total
Jan			1	1
Feb	1		1	2
May	2		1	3
Oct		1		1
Dec	1			1
Grand Total	**4**	**1**	**3**	**8**

Day	2022	2024	2025 (Jan-May)	Grand Total
Mon		1		1
Tue	1			1
Thu	1		1	2
Fri			2	2
Sat	1			1
Sun	1			1
Grand Total	**4**	**1**	**3**	**8**

Start time	2022	2024	2025 (Jan-May)	Grand Total
1am-1.59am	1			1
6pm-6.59pm	1			1
9pm-9.59pm			2	2
10pm-10.59pm		1		1
11pm-11.59pm	2		1	3
Grand Total	**4**	**1**	**3**	**8**

NZ Deprivation Index 2023	2022	2024	2025 (Jan-May)	Grand Total
6	2		1	3
7	2	1	2	5
Grand Total	**4**	**1**	**3**	**8**

174

Police recorded alcohol-related family harm, in Rakiura/Stewart Island

Statistical Area 2	2020 (Jul-Dec)	2022	2024	2025 (Jan-May)	Grand Total
Stewart Island	1	6	2	1	10
Grand Total	**1**	**6**	**2**	**1**	**10**

Division	2020 (Jul-Dec)	2022	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		2			2
ACTS INTENDED TO CAUSE INJURY	1	3			4
UNKNOWN ANZSOC DIVISION		1	2	1	4
Grand Total	**1**	**6**	**2**	**1**	**10**

Month	2020 (Jul-Dec)	2022	2024	2025 (Jan-May)	Grand Total
Feb			1		1
Apr				1	1
Jun		1	1		2
Sep	1	2			3
Oct		3			3
Grand Total	**1**	**6**	**2**	**1**	**10**

Day	2020 (Jul-Dec)	2022	2024	2025 (Jan-May)	Grand Total
Mon				1	1
Wed	1				1
Thu		1			1
Sat			1		1
Sun		5	1		6
Grand Total	**1**	**6**	**2**	**1**	**10**

Start time	2020 (Jul-Dec)	2022	2024	2025 (Jan-May)	Grand Total
1am-1.59am		2			2
3am-3.59am			1		1
5am-5.59am				1	1
3pm-3.59pm		3			3
6pm-6.59pm		1			1
7pm-7.59pm	1				1
10pm-10.59pm			1		1
Grand Total	**1**	**6**	**2**	**1**	**10**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2022	2024	2025 (Jan-May)	Grand Total
6	1	4			5
7		2	2	1	5
Grand Total	**1**	**6**	**2**	**1**	**10**

Scene type	2020 (Jul-Dec)	2022	2024	2025 (Jan-May)	Grand Total
Residential	1	6	2	1	10
Grand Total	**1**	**6**	**2**	**1**	**10**

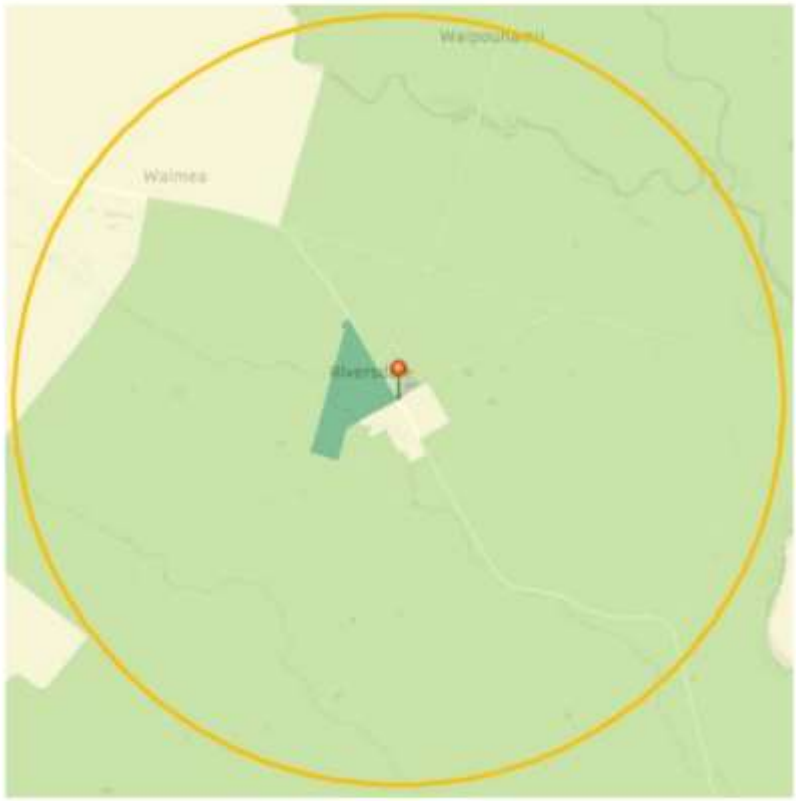
175

Riversdale

Within 5km of the intersection of York Road and State Highway 94

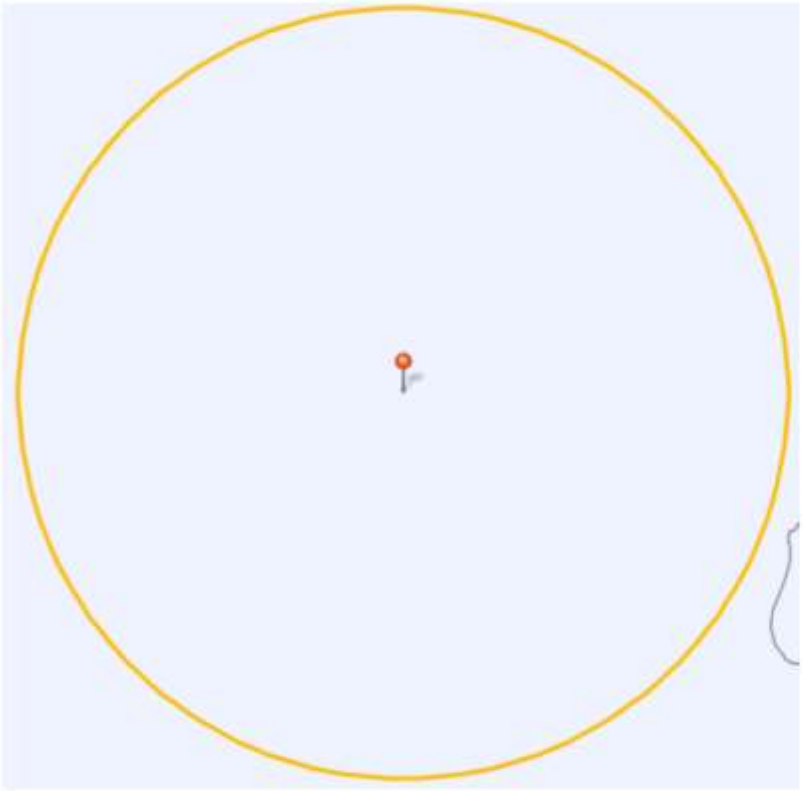
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

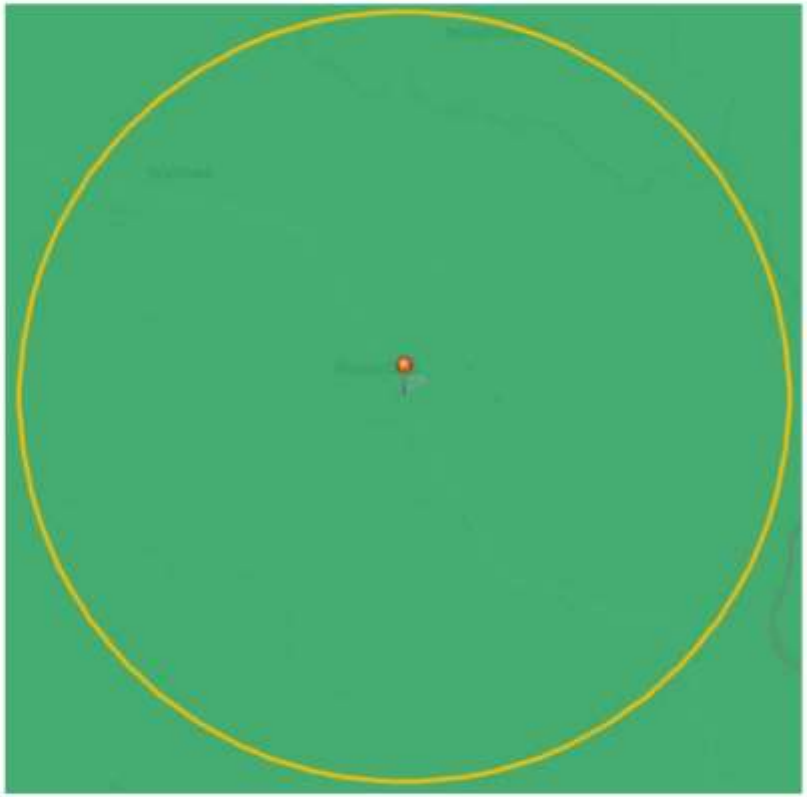
NZ Deprivation Index 2023 and alcohol ban area/s in Riversdale



177

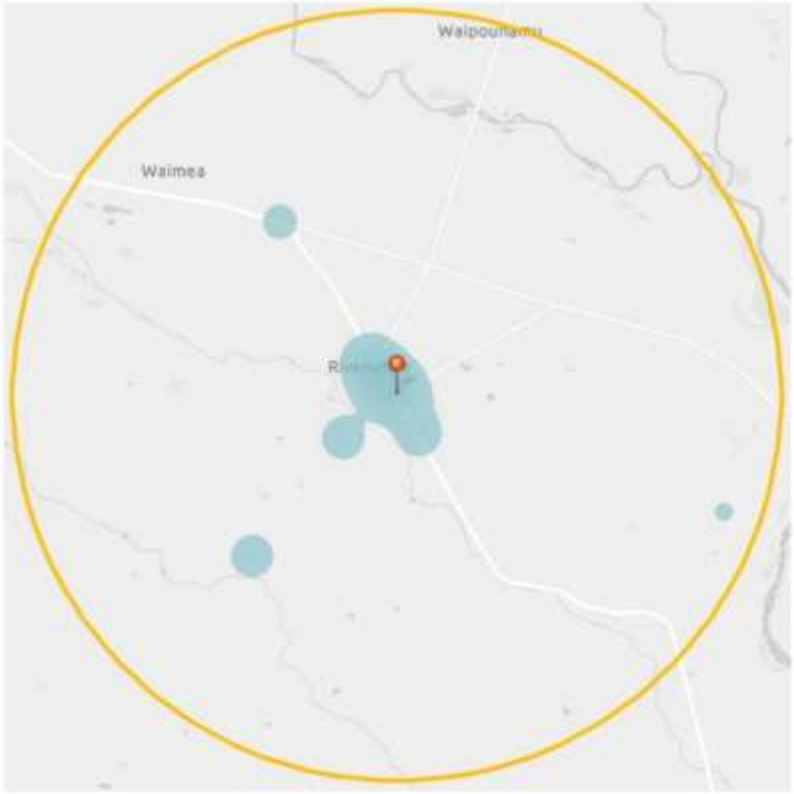
Sum of NZ Crime Harm Index scores – Riversdale





178

Police recorded alcohol-related harm in Riversdale



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Riversdale-Piano Flat	7	4	17	26	23	1	78
Grand Total	**7**	**4**	**17**	**26**	**23**	**1**	**78**

179

Police recorded alcohol-related harm in Riversdale

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON	1			2			3
ACTS INTENDED TO CAUSE INJURY			1	5	2		8
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS			1	2	2		5
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS					1		1
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES					1		1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1	3		3		7
PUBLIC ORDER OFFENCES				1		1	2
SEXUAL ASSAULT AND RELATED OFFENCES	4						4
THEFT AND RELATED OFFENCES				1			1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	3	5	8	7		24
UNKNOWN ANZSOC DIVISION	1		7	7	7		22
Grand Total	**7**	**4**	**17**	**26**	**23**	**1**	**78**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan			1	4	1		6
Feb				3	8		11
Mar			1	2	3		6
Apr			2				2
May		1		4		1	6
Jun				1			1
Jul	1		4	3			8
Aug	1			3	1		5
Sep	4		1	4	5		14
Oct		3			1		4
Nov			3		4		7
Dec	1		5	2			8
Grand Total	**7**	**4**	**17**	**26**	**23**	**1**	**78**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	4		4	2			10
Tue				3	1		4
Wed	1			1			2
Thu				4			4
Fri		2	1	5	11	1	20
Sat	1		5	4	7		17
Sun	1	2	7	7	4		21
Grand Total	**7**	**4**	**17**	**26**	**23**	**1**	**78**

180

Police recorded alcohol-related harm in Riversdale

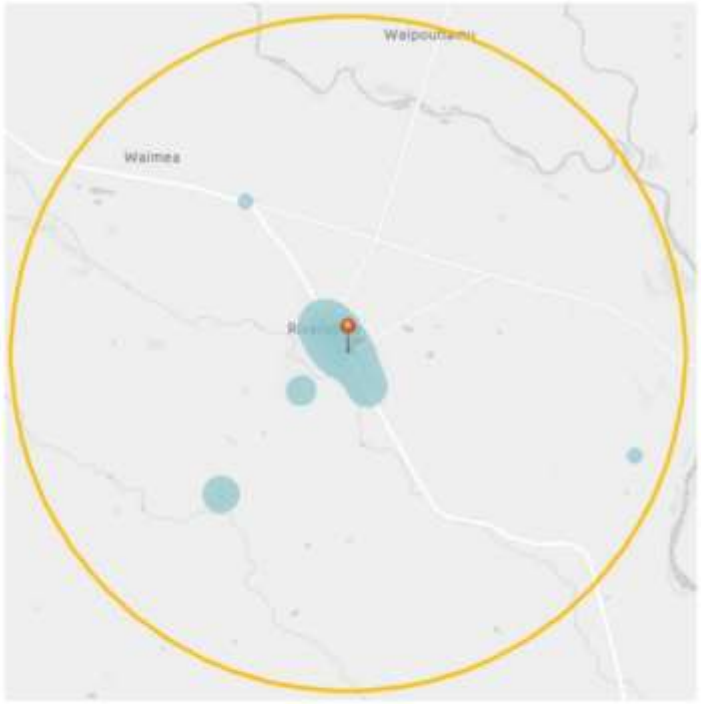
Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1			2			3
1am-1.59am		2	1	2	1		6
4am-4.59am			2				2
11am-11.59am		1					1
12pm-12.59pm			1				1
3pm-3.59pm					3		3
4pm-4.59pm			1	1	1		3
6pm-6.59pm	2			2			4
7pm-7.59pm		1		4	1		6
8pm-8.59pm			4	5	4		13
9pm-9.59pm	4		6	4	1		15
10pm-10.59pm				5	9		14
11pm-11.59pm			2	1	3	1	7
Grand Total	**7**	**4**	**17**	**26**	**23**	**1**	**78**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
2	1		2	4	18		25
3	4	4	2	7	3		20
4	1		2	5	2	1	11
5	1		10	3			14
6			1	7			8
Grand Total	**7**	**4**	**17**	**26**	**23**	**1**	**78**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial						1	1
In Transit				1	3		4
Online	1						1
Public Space	1	3	7	13	12		36
Residential	5	1	10	12	8		36
Grand Total	**7**	**4**	**17**	**26**	**23**	**1**	**78**

181

Police recorded alcohol-related harm in outdoor public places, in Riversdale



Division	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
ACTS INTENDED TO CAUSE INJURY				2	1	3
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS			1	2	2	5
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS					1	1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION					1	1
PUBLIC ORDER OFFENCES				1		1
THEFT AND RELATED OFFENCES				1		1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	3	5	7	5	21
UNKNOWN ANZSOC DIVISION			1		2	3
Grand Total	**1**	**3**	**7**	**13**	**12**	**36**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Jan			1		1	2
Feb				2	7	9
Mar			1	2		3
Apr			1			1
May		1				1
Jul	1		3	2		6
Aug				1		1
Sep				4		4
Oct		2				2
Nov			1		4	5
Dec				2		2
Grand Total	**1**	**3**	**7**	**13**	**12**	**36**

182

Police recorded alcohol-related harm in outdoor public places, in Riversdale

Day	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Mon			2	2		4
Thu				4		4
Fri		1	1	3	5	10
Sat	1		4	2	6	13
Sun		2		2	1	5
Grand Total	**1**	**3**	**7**	**13**	**12**	**36**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
12am-12.59am	1			2		3
1am-1.59am		2			1	3
4am-4.59am			1			1
11am-11.59am		1				1
12pm-12.59pm			1			1
4pm-4.59pm			1			1
6pm-6.59pm				2		2
7pm-7.59pm				4		4
8pm-8.59pm			4		4	8
9pm-9.59pm				1	1	2
10pm-10.59pm				3	4	7
11pm-11.59pm				1	2	3
Grand Total	**1**	**3**	**7**	**13**	**12**	**36**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
2			1	2	9	12
3		3	2	6	2	13
4			1	2	1	4
5	1		3	3		7
Grand Total	**1**	**3**	**7**	**13**	**12**	**36**

183

Drink driving in Riversdale

Division	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	2	5	6	6	20
Grand Total	**1**	**2**	**5**	**6**	**6**	**20**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Jan			1			1
Feb				1	3	4
Mar			1	1		2
Apr			1			1
May		1				1
Jul	1		1	1		3
Aug				1	1	2
Sep				1		1
Oct		1			1	2
Nov			1		1	2
Dec				1		1
Grand Total	**1**	**2**	**5**	**6**	**6**	**20**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Mon			1			1
Thu				1		1
Fri		1	1	3	4	9
Sat	1		3	1	2	7
Sun		1		1		2
Grand Total	**1**	**2**	**5**	**6**	**6**	**20**

184

Drink driving in Riversdale

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
12am-12.59am	1			1		2
1am-1.59am		1				1
4am-4.59am			1			1
11am-11.59am		1				1
12pm-12.59pm			1			1
7pm-7.59pm				1		1
8pm-8.59pm			3		1	4
9pm-9.59pm				1		1
10pm-10.59pm				3	3	6
11pm-11.59pm					2	2
Grand Total	**1**	**2**	**5**	**6**	**6**	**20**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
2			1		4	5
3		2	2	3	2	9
4				1		1
5	1		2	2		5
Grand Total	**1**	**2**	**5**	**6**	**6**	**20**

185

Police recorded alcohol-related family harm, in Riversdale

Statistical Area 2	2020 (Jul-Dec)	2022	2023	2024	Grand Total
Riversdale-Piano Flat	1	10	13	6	30
Grand Total	**1**	**10**	**13**	**6**	**30**

Month	2020 (Jul-Dec)	2022	2023	2024	Grand Total
Jan			4		4
Feb			1		1
Mar				3	3
Apr		1			1
May			3		3
Jun			1		1
Jul		1	2		3
Aug			2		2
Sep		1		3	4
Nov		2			2
Dec	1	5			6
Grand Total	**1**	**10**	**13**	**6**	**30**

Day	2020 (Jul-Dec)	2022	2023	2024	Grand Total
Mon		2	2		4
Tue			3		3
Wed	1		1		2
Fri			1	3	4
Sat		1	2		3
Sun		7	4	3	14
Grand Total	**1**	**10**	**13**	**6**	**30**

Division	2020 (Jul-Dec)	2022	2023	2024	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON	1		2		3
ACTS INTENDED TO CAUSE INJURY		1	5	1	7
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES				1	1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		3		2	5
UNKNOWN ANZSOC DIVISION		6	6	2	14
Grand Total	**1**	**10**	**13**	**6**	**30**

186

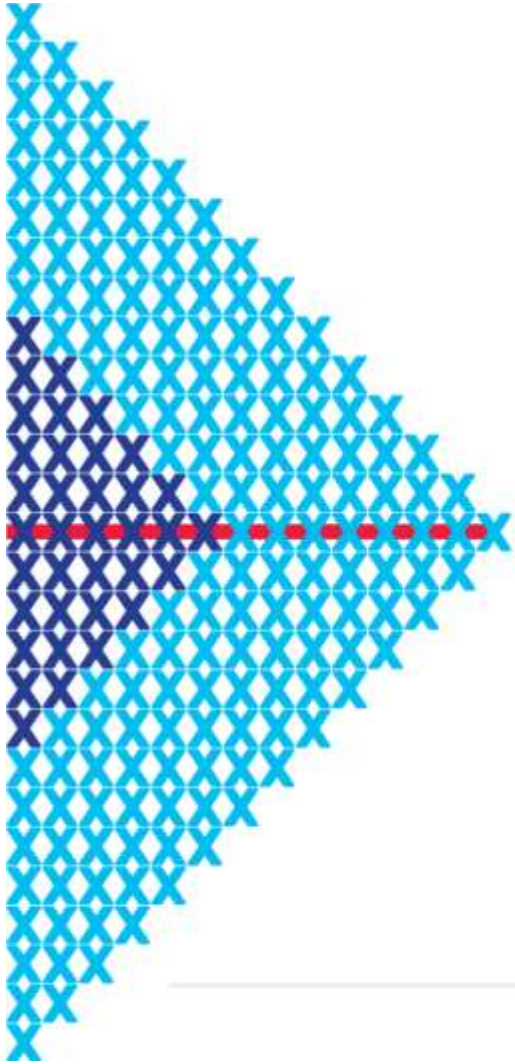
Police recorded alcohol-related family harm, in Riversdale

Start time	2020 (Jul-Dec)	2022	2023	2024	Grand Total
1am-1.59am		1	2		3
4am-4.59am		1			1
3pm-3.59pm				3	3
4pm-4.59pm			1		1
6pm-6.59pm	1		2		3
8pm-8.59pm			4		4
9pm-9.59pm		6	3		9
10pm-10.59pm			1	3	4
11pm-11.59pm		2			2
Grand Total	**1**	**10**	**13**	**6**	**30**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2022	2023	2024	Grand Total
2	1	1	4	6	12
4		1	3		4
5		7			7
6		1	6		7
Grand Total	**1**	**10**	**13**	**6**	**30**

Scene type	2020 (Jul-Dec)	2022	2023	2024	Grand Total
Online	1				1
Public Space			2		2
Residential		10	11	6	27
Grand Total	**1**	**10**	**13**	**6**	**30**

187



Riverton/Aparima

Within 5km of 108 Palmerston Street

NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

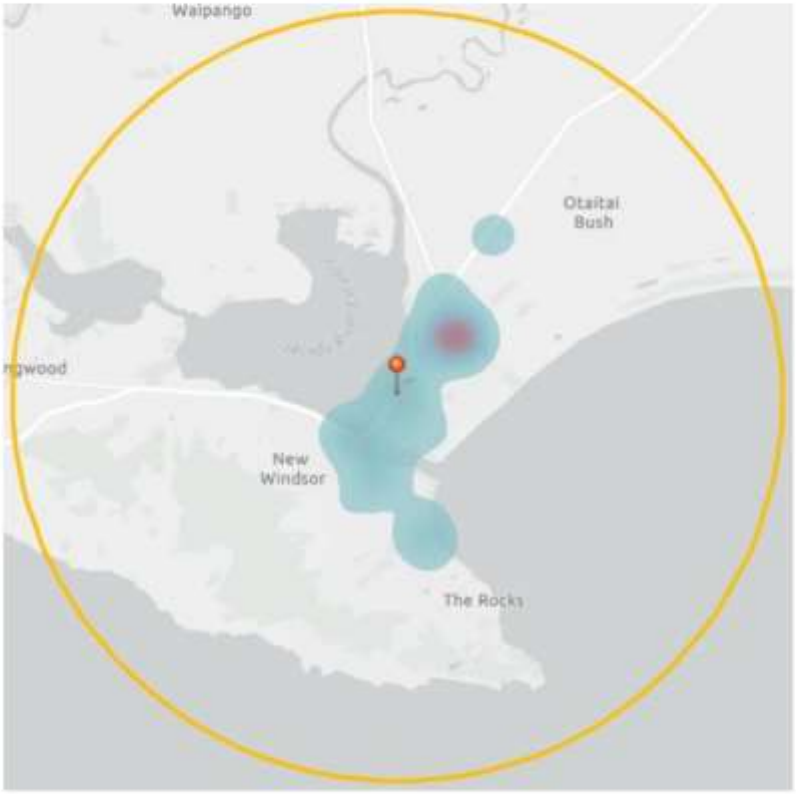
NZ Deprivation Index 2023 and alcohol ban area/s in Riverton/Aparima

189

Sum of NZ Crime Harm Index scores – Riverton/Aparima

190

Police recorded alcohol-related harm in Riverton/Aparima



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Ōtautau	1	3	1	4	1	2	12
Riverton	17	40	45	35	38	20	195
Longwood Forest			2				2
Grand Total	**18**	**43**	**48**	**39**	**39**	**22**	**209**

Police recorded alcohol-related harm in Riverton/Aparima

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON			1		1		2
ACTS INTENDED TO CAUSE INJURY	1	1	5	7	7	2	23
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		2	1		3		6
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1		3		4
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES			1	1			2
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1	2		1		4
PUBLIC ORDER OFFENCES	2	3	3	2		2	12
SEXUAL ASSAULT AND RELATED OFFENCES		3	1	2			6
THEFT AND RELATED OFFENCES	2						2
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	16	19	15	14	11	79
UNKNOWN ANZSOC DIVISION	9	16	14	11	9	7	66
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER		1		1	1		3
Grand Total	**18**	**43**	**48**	**39**	**39**	**22**	**209**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		3	3	3	1	1	11
Feb		3	3	7	4	2	19
Mar		4	7	2	5	8	26
Apr		1	3	6	7	7	24
May		2	7	3	2	4	18
Jun		7	3	1	1		12
Jul		3	5	2			10
Aug		3	5	2	5		15
Sep	5	4	1	3	4		17
Oct	3	4	1	5	2		15
Nov	1	6	5	1	2		15
Dec	9	3	5	4	6		27
Grand Total	**18**	**43**	**48**	**39**	**39**	**22**	**209**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	2	4	3		7	1	17
Tue	2	3		4	2	1	12
Wed	4	1	7	1	3	7	23
Thu	2	6	4	1	6	2	21
Fri	3	4	17	8	8	5	45
Sat	2	14	10	15	12	3	56
Sun	3	11	7	10	1	3	35
Grand Total	**18**	**43**	**48**	**39**	**39**	**22**	**209**

192

Police recorded alcohol-related harm in Riverton/Aparima

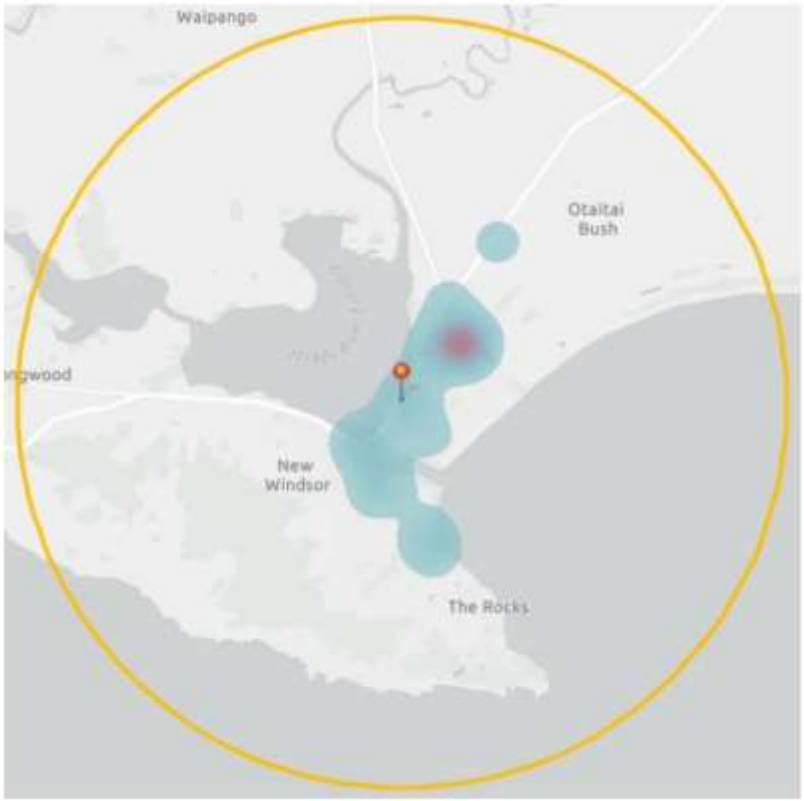
Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	4	2		2		10
1am-1.59am		3	1			1	5
2am-2.59am		1	4		1	1	7
3am-3.59am			2	2		1	5
4am-4.59am		4		1			5
5am-5.59am				1		1	2
7am-7.59am		1					1
8am-8.59am					2		2
10am-10.59am	1						1
11am-11.59am		1		1			2
12pm-12.59pm			1	3			4
1pm-1.59pm	2			1	2		5
2pm-2.59pm		3	3	2		1	9
3pm-3.59pm	1	1	3		2		7
4pm-4.59pm		1	2		2	3	8
5pm-5.59pm	3	1	1	1	8		14
6pm-6.59pm	2	7	4	6	4	2	25
7pm-7.59pm	3	4	8	4	5	2	26
8pm-8.59pm	1		3	6	3	7	20
9pm-9.59pm	2	4	4	5	3	1	19
10pm-10.59pm		6	3	2	1	2	14
11pm-11.59pm	1	2	7	4	4		18
Grand Total	**18**	**43**	**48**	**39**	**39**	**22**	**209**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
3		7	3	3	4	2	19
6	1	3		4	1	1	10
7	2	4	14	8	1	2	31
8	11	17	22	21	24	16	111
9	4	12	9	3	9	1	38
Grand Total	**18**	**43**	**48**	**39**	**39**	**22**	**209**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial			2	7			9
Community		3					3
In Transit			2		1		3
Public Space	9	28	25	23	21	17	123
Residential	8	12	19	8	17	5	69
Retail	1						1
Unknown				1			1
Grand Total	**18**	**43**	**48**	**39**	**39**	**22**	**209**

193

Police recorded alcohol-related harm in outdoor public places, in Riverton/Aparima



Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2	2	2	1		7
Feb		2	3	4	2	1	12
Mar		2	6	2	4	6	20
Apr			2	3	6	6	17
May		2	1	1		4	8
Jun		6		1			7
Jul		2	1	1			4
Aug		2	4	2	1		9
Sep	3	3	1	3	2		12
Oct	2	1		2			5
Nov		4	3	1	1		9
Dec	4	2	2	1	4		13
Grand Total	**9**	**28**	**25**	**23**	**21**	**17**	**123**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	2			4		7
Tue	2	1		3		1	7
Wed		1	2		2	7	12
Thu		3			2	2	7
Fri	2	4	9	7	4	4	30
Sat	1	11	9	9	9	2	41
Sun	3	6	5	4		1	19
Grand Total	**9**	**28**	**25**	**23**	**21**	**17**	**123**

194

Police recorded alcohol-related harm in outdoor public places, in Riverton/Aparima

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A			1		1		2
ACTS INTENDED TO CAUSE INJURY				1	2	1	4
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		2	1		3		6
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS					1		1
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES			1	1			2
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1					1
PUBLIC ORDER OFFENCES	2	1	1	1		1	6
SEXUAL ASSAULT AND RELATED OFFENCES			1				1
THEFT AND RELATED OFFENCES	1						1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	16	17	15	14	11	77
UNKNOWN ANZSOC DIVISION	2	8	3	5		4	22
Grand Total	**9**	**28**	**25**	**23**	**21**	**17**	**123**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	2	2				6
1am-1.59am		2	1				3
2am-2.59am		1	4				5
3am-3.59am				1		1	2
4am-4.59am		3					3
11am-11.59am		1		1			2
1pm-1.59pm	1						1
2pm-2.49pm		2	3	2		1	8
3pm-3.59pm		1			1		2
4pm-4.59pm					2	2	4
5pm-5.59pm				1	4		5
6pm-6.59pm	2	6	2	5	4	2	21
7pm-7.59pm	3	3	7	4	5	2	24
8pm-8.59pm	1		2	4	2	6	15
9pm-9.59pm		3	1	2		1	7
10pm-10.59pm		3	2			2	7
11pm-11.59pm		1	1	3	3		8
Grand Total	**9**	**28**	**25**	**23**	**21**	**17**	**123**

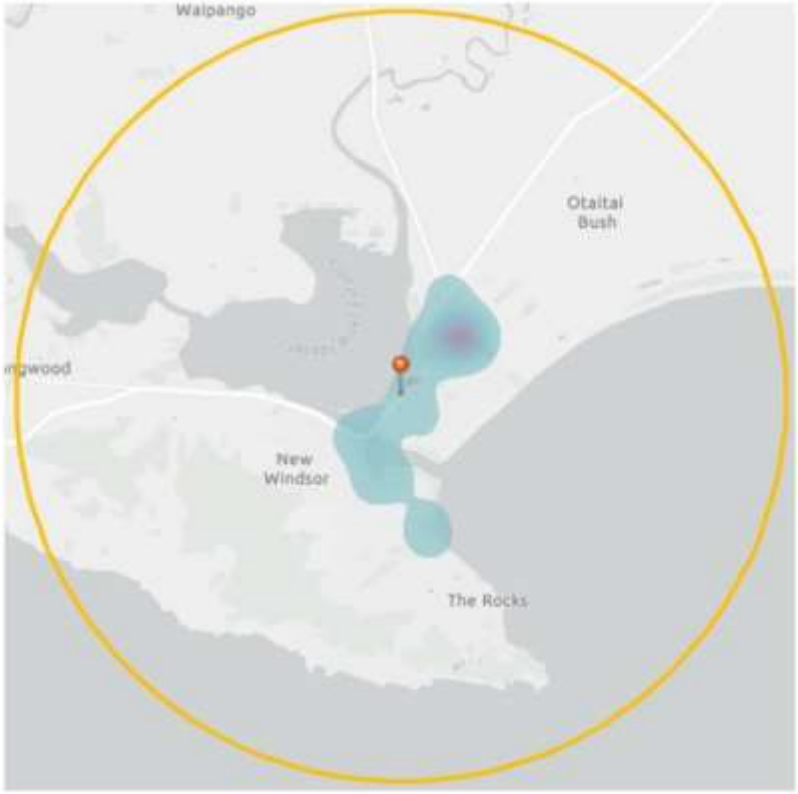
NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
3		7	1	3	2	1	14
6	1	2		3	1	1	8
7		2	9	3			14
8	6	12	12	13	16	14	73
9	2	5	3	1	2	1	14
Grand Total	**9**	**28**	**25**	**23**	**21**	**17**	**123**

195

Drink driving in Riverton/Aparima

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1	1	1	1		4
Feb		1	1	3	1	1	7
Mar		1	4	2	3	5	15
Apr			2	3	3	3	11
May		1	1	1		1	4
Jun		3	2	1			6
Jul		1	1				2
Aug		2	1	1	1		5
Sep	2	1		3	2		8
Nov		2	3		1		6
Dec	1	2	1		4		8
Grand Total	**3**	**15**	**17**	**15**	**16**	**10**	**76**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		1			1		2
Wed		1			1	4	6
Thu		1	2		2	1	6
Fri	1	4	5	5	4	4	23
Sat	1	5	6	6	8	1	27
Sun	1	3	4	4			12
Grand Total	**3**	**15**	**17**	**15**	**16**	**10**	**76**



Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS					2		2
TRAFFIC AND VEHICLE REGULATORY OFFENCES	3	15	17	15	14	10	74
Grand Total	**3**	**15**	**17**	**15**	**16**	**10**	**76**

196

Drink driving in Riverton/Aparima

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1	1	2				4
1am-1.59am		1					1
2am-2.59am			1				1
3am-3.59am				1			1
4am-4.59am		1					1
11am-11.59am		1		1			2
2pm-2.49pm		1	2	1		1	5
3pm-3.59pm		1			1		2
4pm-4.59pm			1		2	1	4
5pm-5.59pm				1	3		4
6pm-6.59pm	1	2	3	5	1	1	13
7pm-7.59pm	1	2	4	2	5	2	16
8pm-8.59pm			1	2	2	3	8
9pm-9.59pm		2	1	1			4
10pm-10.59pm		2	1			2	5
11pm-11.59pm		1	1	1	2		5
Grand Total	**3**	**15**	**17**	**15**	**16**	**10**	**76**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
3		4	1	2	1		8
6		2		2	1		5
7		1	4	3			8
8	2	5	11	7	13	9	47
9	1	3	1	1	1	1	8
Grand Total	**3**	**15**	**17**	**15**	**16**	**10**	**76**

Police recorded alcohol-related family harm, in Riverton/Aparima

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Ôtautau		1	1	1			3
Riverton	6	8	13	9	17	3	56
Grand Total	**6**	**9**	**14**	**10**	**17**	**3**	**59**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	2	1		6		10
Tue				1	2	1	4
Wed	3		4	1	1		9
Thu		4			4		8
Fri	1		7		3	1	12
Sat	1		1	6		1	9
Sun		3	1	2	1		7
Grand Total	**6**	**9**	**14**	**10**	**17**	**3**	**59**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1		1		1	3
Feb				1	2	1	4
Mar		1					1
Apr		1		2	4		7
May			5	1	2	1	9
Jun		1					1
Jul		1	3	1			5
Aug		1	1		4		6
Sep		1	1		1		3
Oct	1			3	2		6
Nov	1	1	1		1		4
Dec	4	1	3	1	1		10
Grand Total	**6**	**9**	**14**	**10**	**17**	**3**	**59**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON					1		1
ACTS INTENDED TO CAUSE INJURY	1	1	4	3	4		13
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1		3		4
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION			1		1		2
PUBLIC ORDER OFFENCES		1	2				3
SEXUAL ASSAULT AND RELATED OFFENCES				2			2
UNKNOWN ANZSOC DIVISION	5	7	6	5	8	3	34
Grand Total	**6**	**9**	**14**	**10**	**17**	**3**	**59**

198

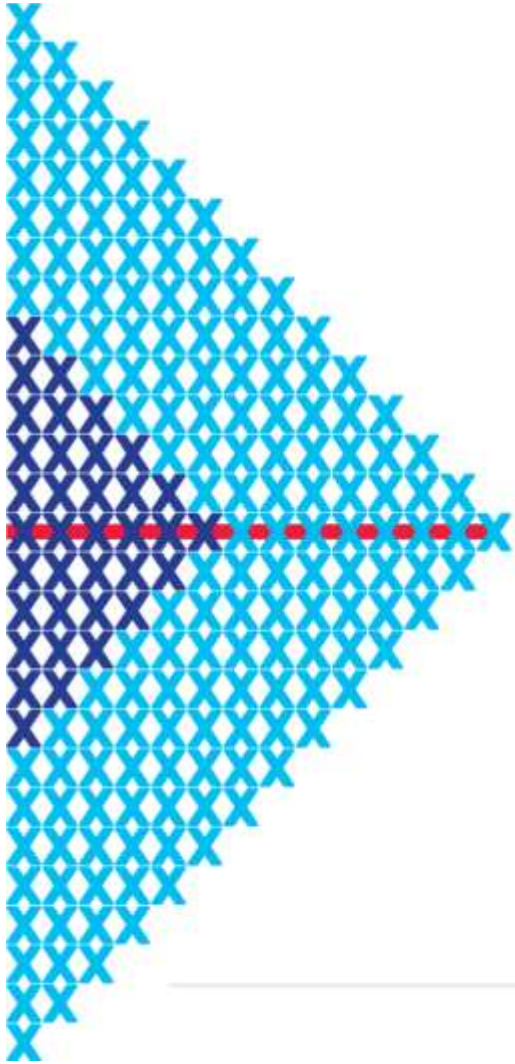
Police recorded alcohol-related family harm, in Riverton/Aparima

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am		2			1		3
1am-1.59am		1					1
2am-2.59am			1				1
3am-3.59am			2	1			3
4am-4.59am		1		1			2
5am-5.59am				1		1	2
8am-8.59am					2		2
12pm-12.59pm				3			3
1pm-1.59pm	1			1	2		4
2pm-2.49pm				1			1
3pm-3.59pm			3		1		4
4pm-4.59pm		1					1
5pm-5.59pm	2				4		6
6pm-6.59pm		1		1	3		5
7pm-7.59pm		1					1
8pm-8.59pm			2	1		1	4
9pm-9.59pm	2	1			3	1	7
10pm-10.59pm					1		1
11pm-11.59pm	1	1	6				8
Grand Total	**6**	**9**	**14**	**10**	**17**	**3**	**59**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
3			1		1	2	4
6		1		1			2
7	2	1	3	2	1	1	10
8	3	4	5	5	9		26
9	1	3	5	2	6		17
Grand Total	**6**	**9**	**14**	**10**	**17**	**3**	**59**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
In Transit					1		1
Public Space		1	2	1	3	1	8
Residential	6	8	12	8	13	2	49
Unknown				1			1
Grand Total	**6**	**9**	**14**	**10**	**17**	**3**	**59**

199

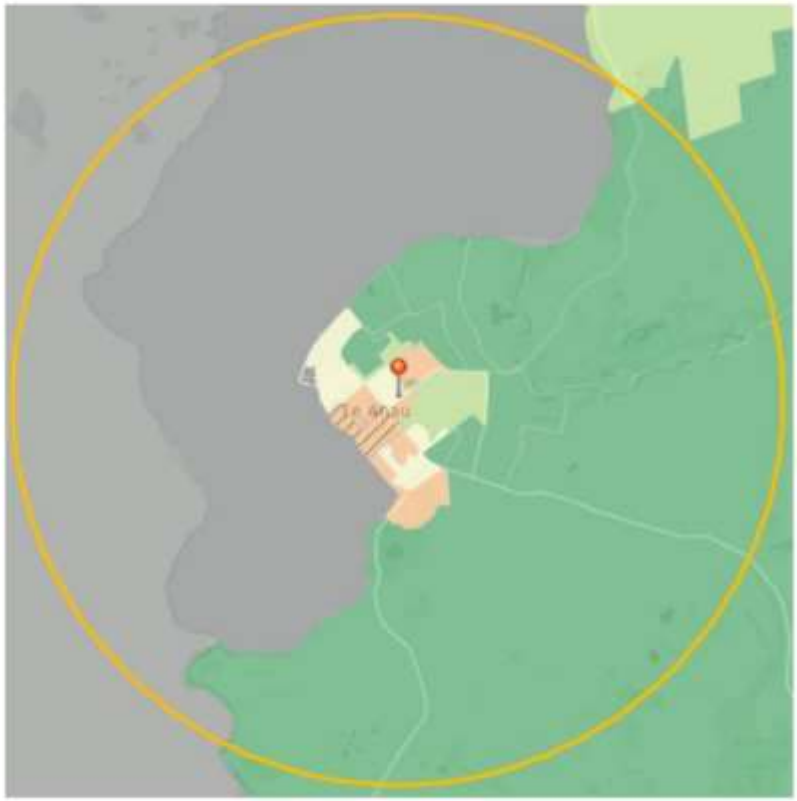


Te Anau

Within 5km of the intersection of Pop Andrew Drive and State Highway 94

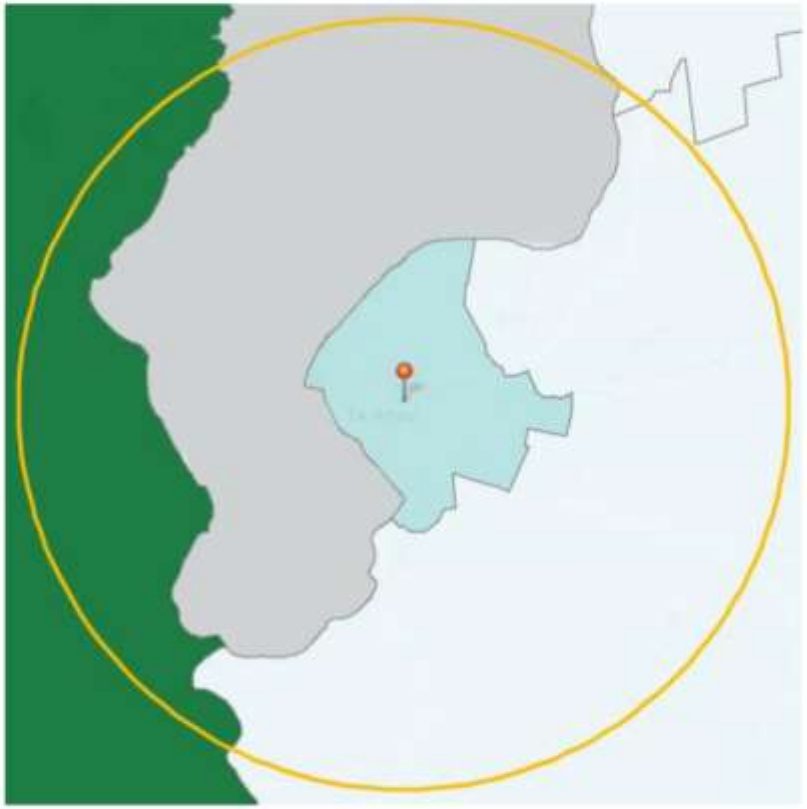
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

NZ Deprivation Index 2023 and alcohol ban area/s in Te Anau



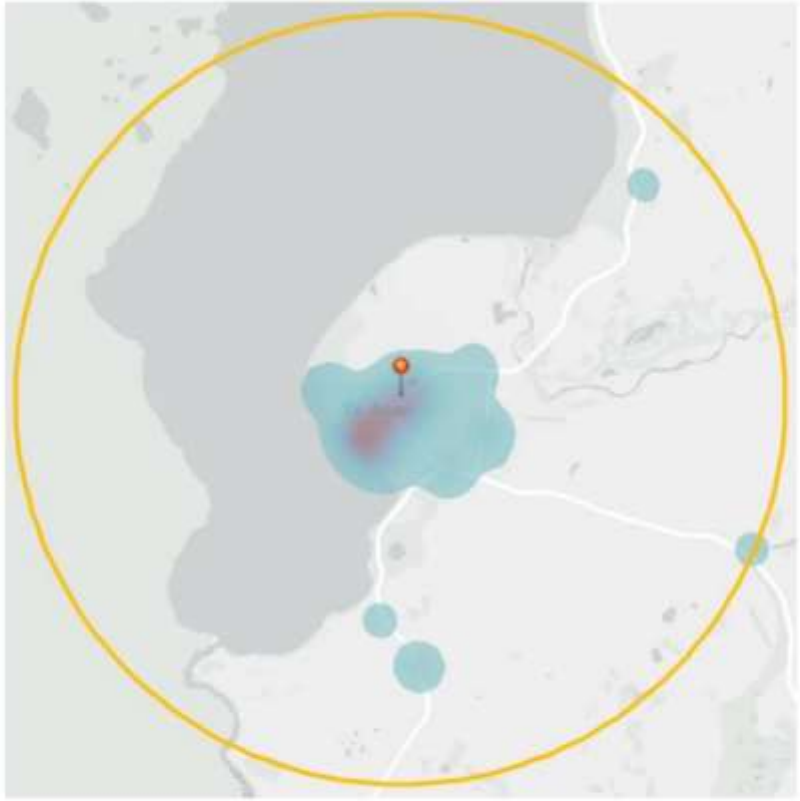
201

Sum of NZ Crime Harm Index scores – Te Anau



202

Police recorded alcohol-related harm in Te Anau



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Te Ānau	12	48	55	56	59	16	246
Whitestone	5	5		5	5	1	21
Grand Total	**17**	**53**	**55**	**61**	**64**	**17**	**267**

Police recorded alcohol-related harm in Te Anau

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		1		1	2	1	5
ACTS INTENDED TO CAUSE INJURY	1	4	6	4	5	2	22
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	1	1	1	1	2		6
ILLICIT DRUG OFFENCES		1			2		3
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		1	1		4	1	7
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION	1	3		3		1	8
PUBLIC ORDER OFFENCES	2	5	8	4	11		30
SEXUAL ASSAULT AND RELATED OFFENCES	1	1				1	3
THEFT AND RELATED OFFENCES	1			3	1		5
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	17	17	15	19	8	80
UNKNOWN ANZSOC DIVISION	6	19	21	30	18	3	97
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER			1				1
Grand Total	**17**	**53**	**55**	**61**	**64**	**17**	**267**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		7	5	6	17	5	40
Feb		3	3	3	4	3	16
Mar		3	2	4	2	3	14
Apr		6	3	3	1	5	18
May		7	1	1	1	1	11
Jun		6	6	10	4		26
Jul	5	3	5	9	2		24
Aug	4	3	2		5		14
Sep		1	5	9	8		23
Oct	3	4	11	2	7		27
Nov	1	6	4	8	6		25
Dec	4	4	8	6	7		29
Grand Total	**17**	**53**	**55**	**61**	**64**	**17**	**267**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	4	1	4	19		29
Tue	2	3	7	2	4	1	19
Wed	2	4	1	9		1	17
Thu	1	2	9	7	5	2	26
Fri	3	12	9	11	14	1	50
Sat	5	14	17	10	8	9	63
Sun	3	14	11	18	14	3	63
Grand Total	**17**	**53**	**55**	**61**	**64**	**17**	**267**

204

Police recorded alcohol-related harm in Te Anau

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	2	7	7	9	3	30
1am-1.59am		4	3	2	1	1	11
2am-2.59am		1	3	1	3	1	9
3am-3.59am		1			1		2
4am-4.59am				1		1	2
5am-5.59am			2				2
6am-6.59am				2	1		3
8am-8.59am				1			1
9am-9.59am				4			4
10am-10.59am				4	5		9
11am-11.59am			2	1	1	1	5
12pm-12.59pm			4	1			5
1pm-1.59pm		1		2			3
2pm-2.59pm				2	1		3
3pm-3.59pm	1	1	1		1		4
4pm-4.59pm		6		4	1	1	12
5pm-5.59pm	1	5	5	1	5		17
6pm-6.59pm	5	1	3	4	6		19
7pm-7.59pm	2	7	3	8	4	2	26
8pm-8.59pm		2	9	7	10		28
9pm-9.59pm	1	8	4	4	5	2	24
10pm-10.59pm	3	8	7	3	5	3	29
11pm-11.59pm	2	6	2	2	5	2	19
Grand Total	**17**	**53**	**55**	**61**	**64**	**17**	**267**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	4	3	5	11	4	2	29
2	3	3	3	5	7	1	22
3	2	5		1		1	9
4		6	3	4	2		15
5		5	2	7	1	1	16
6	1	7	4	1	5	2	20
7	6	22	34	31	44	10	147
8	1	2	4	1	1		9
Grand Total	**17**	**53**	**55**	**61**	**64**	**17**	**267**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial	1	4	2	2	5	1	15
Community				2			2
Education		1					1
In Transit				6	1	1	8
Not Applicable		1		1			2
Online		1		1			2
Public Space	8	28	30	22	38	9	135
Residential	8	18	23	25	19	6	99
Retail				2	1		3
Grand Total	**17**	**53**	**55**	**61**	**64**	**17**	**267**

205

Police recorded alcohol-related harm in outdoor public places, in Te Anau

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		3		1	13	3	20
Feb		2	3		2	1	8
Mar		2			1	1	4
Apr		5	1	1		3	10
May		4	1			1	6
Jun		1	3	3	1		8
Jul	3	2	5	4			14
Aug	1	1	2		3		7
Sep			2	4	6		12
Oct	1	3	9	1	6		20
Nov		3	1	4	2		10
Dec	3	2	3	4	4		16
Grand Total	**8**	**28**	**30**	**22**	**38**	**9**	**135**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	1	1		13		16
Tue		2	6		3		11
Wed		2		2			4
Thu		1	4	1	2	1	9
Fri		4	5	6	9	1	25
Sat	5	11	8	6	2	5	37
Sun	2	7	6	7	9	2	33
Grand Total	**8**	**28**	**30**	**22**	**38**	**9**	**135**

206

Police recorded alcohol-related harm in outdoor public places, in Te Anau

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	2	1	3	5	2	1	14
2	3	3		4	4	1	15
3	1	2		1		1	5
4		2		1			3
5		3					3
6		4	2		2	2	10
7	2	13	22	11	29	4	81
8			3		1		4
Grand Total	**8**	**28**	**30**	**22**	**38**	**9**	**135**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	2	3	3	9	1	20
1am-1.59am		2	1	1	1	1	6
2am-2.59am			2		3		5
3am-3.59am		1			1		2
6am-6.59am					1		1
10am-10.59am				3			3
11am-11.59am			2		1	1	4
12pm-12.59pm			1				1
1pm-1.59pm		1		1			2
2pm-2.49pm				1	1		2
3pm-3.59pm			1		1		2
4pm-4.59pm		4			1		5
5pm-5.59pm		2	4	1	2		9
6pm-6.59pm	4	1	2	1	4		12
7pm-7.59pm	1	4	1	6	1	1	14
8pm-8.59pm		2	7	2	6		17
9pm-9.59pm	1	5	2	2	4	1	15
10pm-10.59pm		2	4	1		2	9
11pm-11.59pm		2			2	2	6
Grand Total	**8**	**28**	**30**	**22**	**38**	**9**	**135**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY		1	2		1	1	5
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	1	1	1	1	2		6
ILLICIT DRUG OFFENCES					2		2
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1		4		5
PUBLIC ORDER OFFENCES	1	3	6	1	8		19
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	17	17	9	18	7	72
UNKNOWN ANZSOC DIVISION	2	6	3	11	3	1	26
Grand Total	**8**	**28**	**30**	**22**	**38**	**9**	**135**

207

Drink driving in Te Anau

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1		2	1	3	7
Feb		1	2		1	1	5
Mar		1				2	3
Apr		3	1			1	5
May		1				1	2
Jun		1	3	3	1		8
Jul	1	2	4	4			11
Aug			1		2		3
Sep			1	2	5		8
Oct	1	2	1		5		9
Nov		2		3	2		7
Dec	2		3	1	1		7
Grand Total	**4**	**14**	**16**	**15**	**18**	**8**	**75**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS			1				1
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS					1		1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	14	15	15	17	8	73
Grand Total	**4**	**14**	**16**	**15**	**18**	**8**	**75**

208

Drink driving in Te Anau

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am		2		2	1	2	7
1am-1.59am		1			1		2
3am-3.59am		1					1
10am-10.59am				1			1
11am-11.59am			2		1	1	4
12pm-12.59pm			1				1
1pm-1.59pm				1			1
2pm-2.49pm					1		1
3pm-3.59pm			1		1		2
4pm-4.59pm		3			1		4
5pm-5.59pm		1	1	1	2		5
6pm-6.59pm	2		2	2	2		8
7pm-7.59pm	1	1	1	4		1	8
8pm-8.59pm		1	4	2	3		10
9pm-9.59pm	1	2	1		2		6
10pm-10.59pm		1	3	2		2	8
11pm-11.59pm		1			3	2	6
Grand Total	**4**	**14**	**16**	**15**	**18**	**8**	**75**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1			1	3		5
Tue			2				2
Wed		1		1			2
Thu			2	1	2		5
Fri		1	5	4	7	1	18
Sat	2	8	6	4	2	6	28
Sun	1	4	1	4	4	1	15
Grand Total	**4**	**14**	**16**	**15**	**18**	**8**	**75**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	1	1	3	4	2		11
2	1	1			2		4
3	1	1		1		1	4
5		1					1
6		4	1		1	2	8
7	1	6	10	10	13	5	45
8			2				2
Grand Total	**4**	**14**	**16**	**15**	**18**	**8**	**75**

209

Police recorded alcohol-related family harm, in Te Anau

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Te Ānau	4	18	17	12	13	2	66
Whitestone	1	1					2
Grand Total	**5**	**19**	**17**	**12**	**13**	**2**	**68**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		2		3	3		8
Tue		2					2
Wed	2	1		2			5
Thu		1	4	3	2	1	11
Fri	2	7	3		4		16
Sat		3	6	2	2	1	14
Sun	1	3	4	2	2		12
Grand Total	**5**	**19**	**17**	**12**	**13**	**2**	**68**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2	3	1	3	1	10
Feb		1		1	2		4
Mar		1	2	2	1		6
Apr		1	1	1	1	1	5
May		5			1		6
Jun		3	1	2			6
Jul				1	1		2
Aug	2	2	1		1		6
Sep			1	2			3
Oct	2	2	1		1		6
Nov	1	1	3	2	1		8
Dec		1	4		1		6
Grand Total	**5**	**19**	**17**	**12**	**13**	**2**	**68**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		1			1	1	3
ACTS INTENDED TO CAUSE INJURY	1	1	3	4	3		12
ILLICIT DRUG OFFENCES		1					1
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		1					1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1					1
PUBLIC ORDER OFFENCES		1			1		2
TRAFFIC AND VEHICLE REGULATORY OFFENCES		1					1
UNKNOWN ANZSOC DIVISION	4	12	14	8	8	1	47
Grand Total	**5**	**19**	**17**	**12**	**13**	**2**	**68**

210

Police recorded alcohol-related family harm, in Te Anau

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am			4				4
1am-1.59am		1		1			2
2am-2.59am		1	1			1	3
3am-3.59am					1		1
5am-5.59am			1				1
6am-6.59am				2			2
8am-8.59am				1			1
9am-9.59am				2			2
10am-10.59am					3		3
12pm-12.59pm			1				1
2pm-2.49pm				1			1
3pm-3.59pm	1						1
4pm-4.59pm		1				1	2
5pm-5.59pm	1	1			1		3
6pm-6.59pm			1		1		2
7pm-7.59pm	1	2	2		2		7
8pm-8.59pm			3	2	4		9
9pm-9.59pm		5		3			8
10pm-10.59pm		6	3		1		10
11pm-11.59pm	2	2	1				5
Grand Total	**5**	**19**	**17**	**12**	**13**	**2**	**68**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	2	1	2	2			7
2		1	2		3		6
3	1	2					3
4		6	2	2	1		11
5		2	2	1		1	6
6	1	1			2		4
7	1	4	8	7	7	1	28
8		2	1				3
Grand Total	**5**	**19**	**17**	**12**	**13**	**2**	**68**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial					1		1
Online		1		1			2
Public Space		4	1	2	1		8
Residential	5	14	16	9	11	2	57
Grand Total	**5**	**19**	**17**	**12**	**13**	**2**	**68**

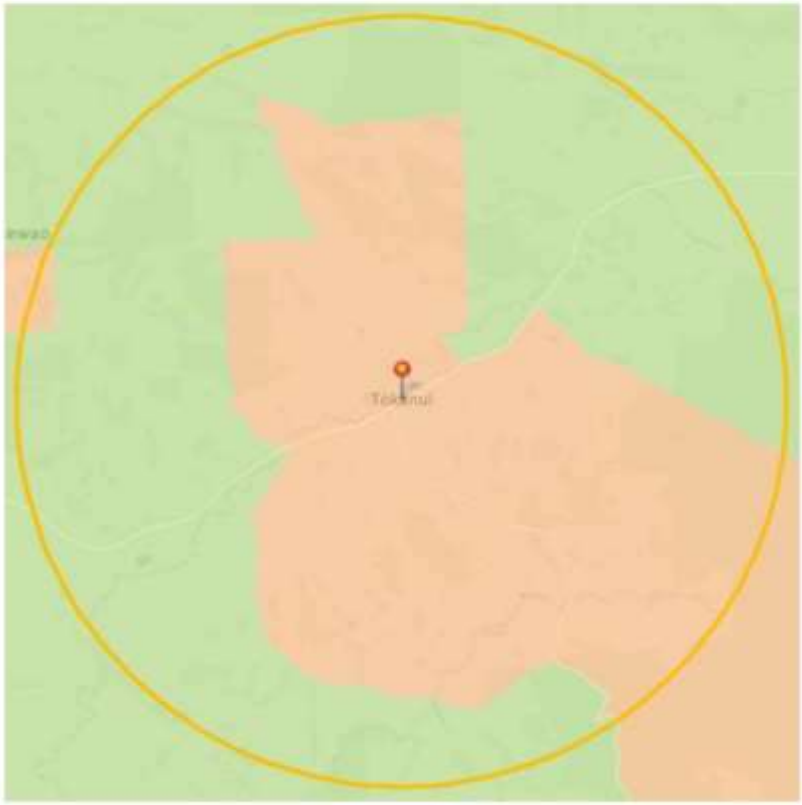
211

Tokonui

Within 5km of the intersection of Mcewan Street and the Niagara-Tokonui HIghway

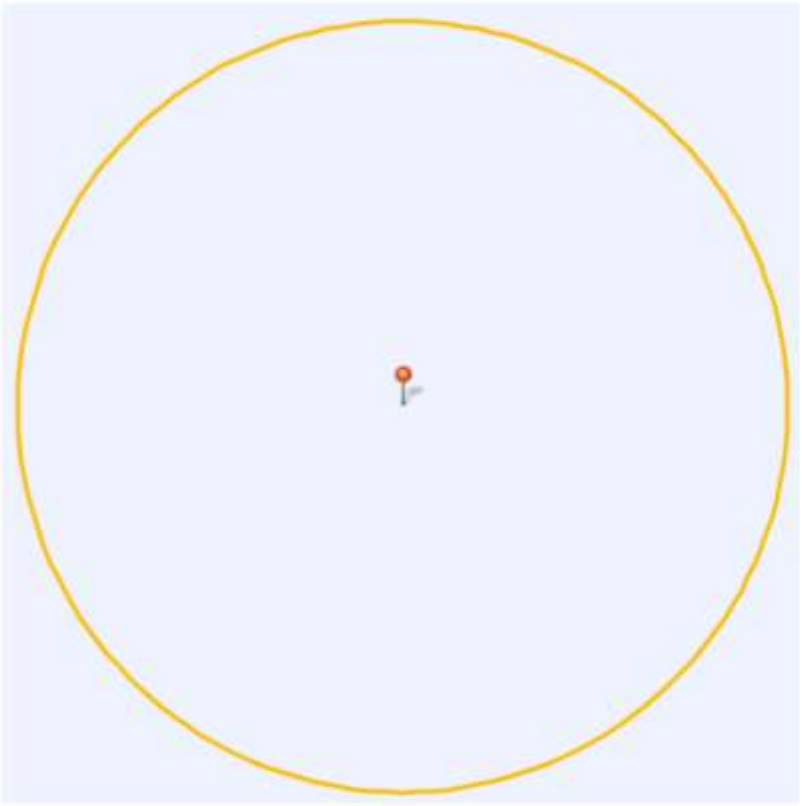
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

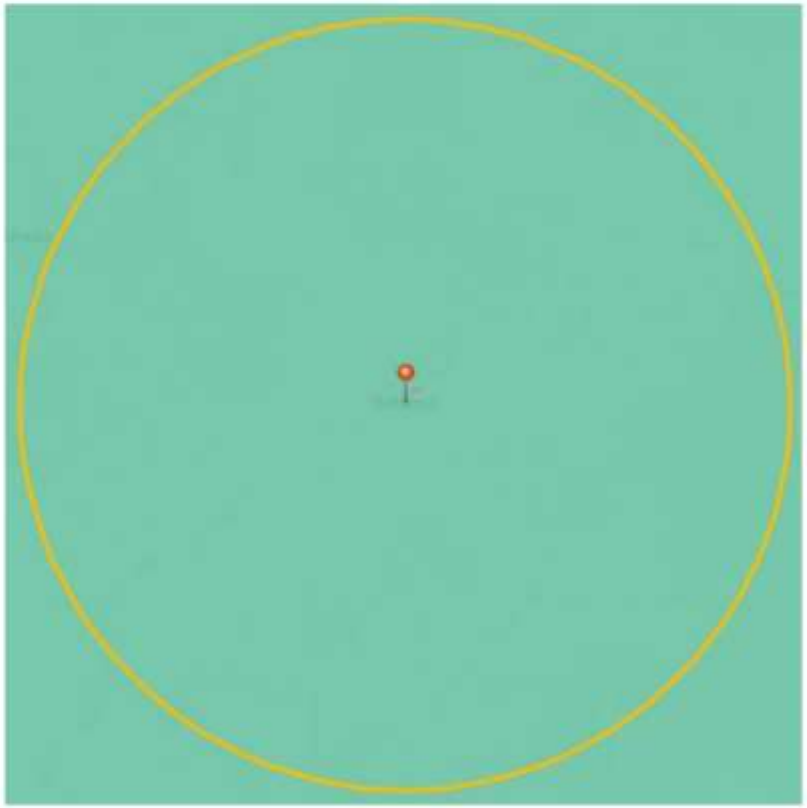
NZ Deprivation Index 2023 and alcohol ban area/s in Tokonui



213

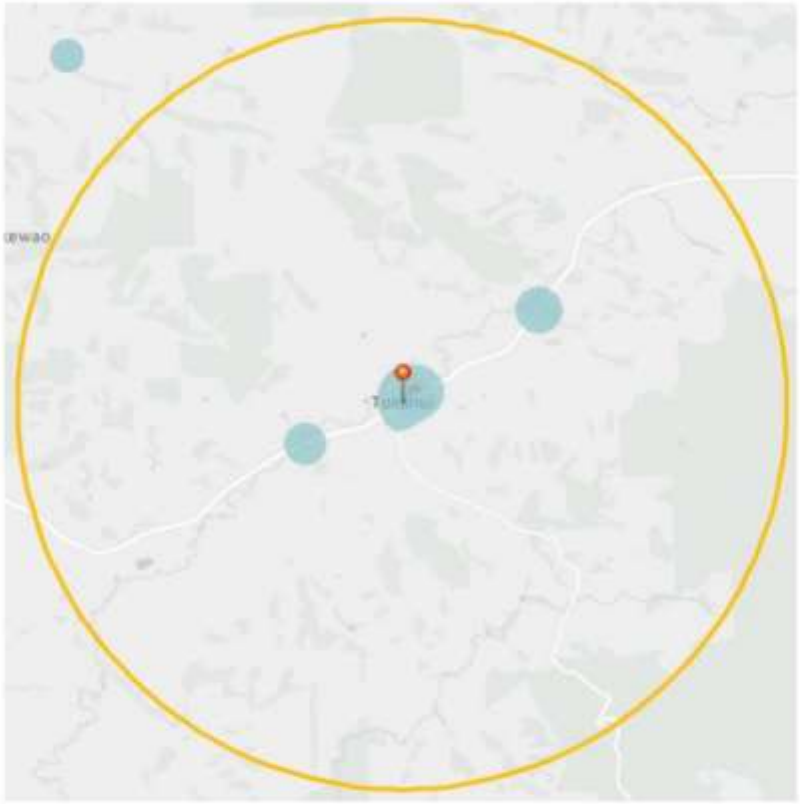
Sum of NZ Crime Harm Index scores – Tokonui





214

Police recorded alcohol-related harm in Tokonui



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Wyndham-Catlins	3	3	2	5	5	1	19
Grand Total	**3**	**3**	**2**	**5**	**5**	**1**	**19**

215

Police recorded alcohol-related harm in Tokonui

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY		2		1			3
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	1						1
PUBLIC ORDER OFFENCES				2			2
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1		2	1	2	1	7
UNKNOWN ANZSOC DIVISION	1	1		1	3		6
Grand Total	**3**	**3**	**2**	**5**	**5**	**1**	**19**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan					1		1
Mar					1	1	2
Apr				2			2
May		1	2				3
Jun				1			1
Sep				1			1
Oct				1			1
Nov					3		3
Dec	3	2					5
Grand Total	**3**	**3**	**2**	**5**	**5**	**1**	**19**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		2		1			3
Tue				1			1
Wed		1					1
Thu				1	1		2
Fri			2	1	3		6
Sat				1	1	1	3
Sun	3						3
Grand Total	**3**	**3**	**2**	**5**	**5**	**1**	**19**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
2am-2.59am				1			1
4am-4.59am					1		1
7am-7.59am		3					3
5pm-5.59pm				1			1
6pm-6.59pm						1	1
7pm-7.59pm			3		3	1	7
8pm-8.59pm				1		1	2
9pm-9.59pm				1			1
10pm-10.59pm						1	1
11pm-11.59pm						1	1
Grand Total	**3**	**3**	**2**	**5**	**5**	**1**	**19**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
4			1	1	2	1	5
7		3		3	1	4	3		14
Grand Total		**3**		**3**	**2**	**5**	**5**	**1**	**19**

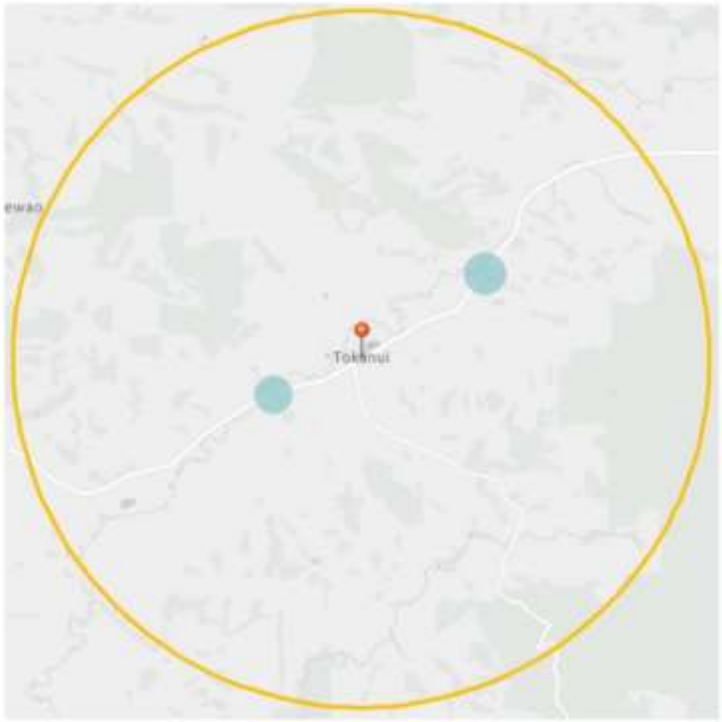
Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial				1			1
Public Space	3		2	2	3	1	11
Residential		3		2	2		7
Grand Total	**3**	**3**	**2**	**5**	**5**	**1**	**19**

216

Police recorded alcohol-related harm in outdoor public places, in Tokonui

Month	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
Mar				1	1	2
May		2				2
Sep			1			1
Oct			1			1
Nov				2		2
Dec	3					3
Grand Total	**3**	**2**	**2**	**3**	**1**	**11**

Day	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
Fri		2	1	3		6
Sat			1		1	2
Sun	3					3
Grand Total	**3**	**2**	**2**	**3**	**1**	**11**



Division	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS	1					1
PUBLIC ORDER OFFENCES			1			1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	2	1	2	1	7
UNKNOWN ANZSOC DIVISION	1			1		2
Grand Total	**3**	**2**	**2**	**3**	**1**	**11**

217

Police recorded alcohol-related harm in outdoor public places, in Tokonui

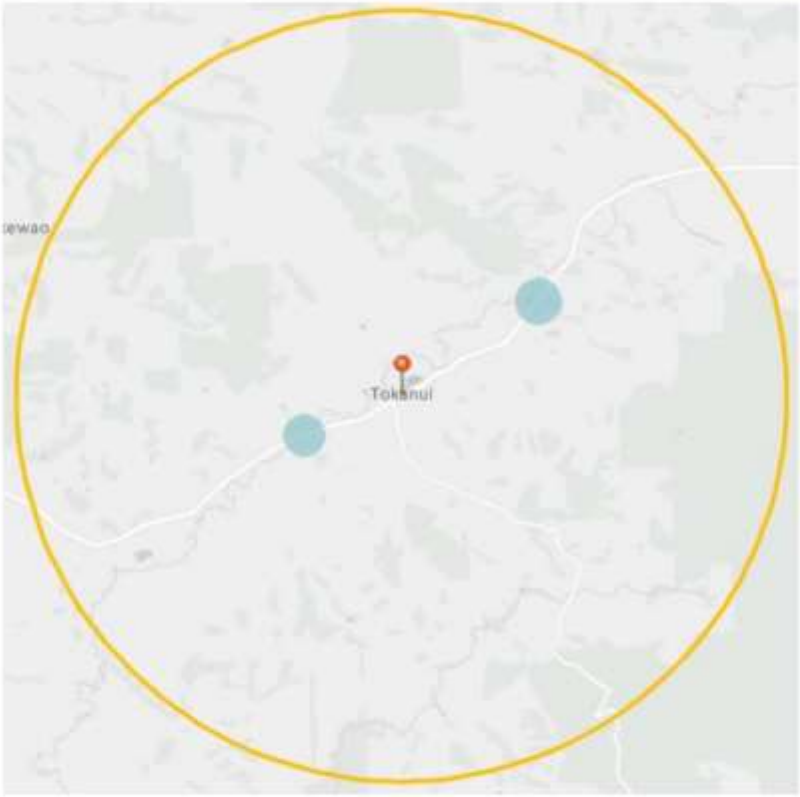
Start time	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
7am-7.59am	3					3
6pm-6.59pm					1	1
7pm-7.59pm			2			2
8pm-8.59pm		1		1		2
9pm-9.59pm		1				1
10pm-10.59pm				1		1
11pm-11.59pm				1		1
Grand Total	**3**	**2**	**2**	**3**	**1**	**11**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
4		1	1	2	1	5
7	3	1	1	1		6
Grand Total	**3**	**2**	**2**	**3**	**1**	**11**

218

Drink driving in Tokonui

Division	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	2	1	2	1	7
Grand Total	**1**	**2**	**1**	**2**	**1**	**7**



Month	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
Mar				1	1	2
May		2				2
Sep			1			1
Nov				1		1
Dec	1					1
Grand Total	**1**	**2**	**1**	**2**	**1**	**7**

Day	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
Fri		2	1	2		5
Sat					1	1
Sun	1					1
Grand Total	**1**	**2**	**1**	**2**	**1**	**7**

Start time	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
7am-7.59am	1					1
6pm-6.59pm					1	1
7pm-7.59pm			1			1
8pm-8.59pm		1		1		2
9pm-9.59pm		1				1
10pm-10.59pm				1		1
Grand Total	**1**	**2**	**1**	**2**	**1**	**7**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2022	2023	2024	2025 (Jan-May)	Grand Total
4		1	1	1	1	4
7	1	1		1		3
Grand Total	**1**	**2**	**1**	**2**	**1**	**7**

219

Police recorded alcohol-related family harm, in Tokonui

Statistical Area 2	2021	2023	2024	Grand Total
Wyndham-Catlins	3	1	2	6
Grand Total	**3**	**1**	**2**	**6**

Division	2021	2023	2024	Grand Total
ACTS INTENDED TO CAUSE INJURY	2			2
UNKNOWN ANZSOC DIVISION	1	1	2	4
Grand Total	**3**	**1**	**2**	**6**

Month	2021	2023	2024	Grand Total
Jan			1	1
Apr		1		1
May	1			1
Nov			1	1
Dec	2			2
Grand Total	**3**	**1**	**2**	**6**

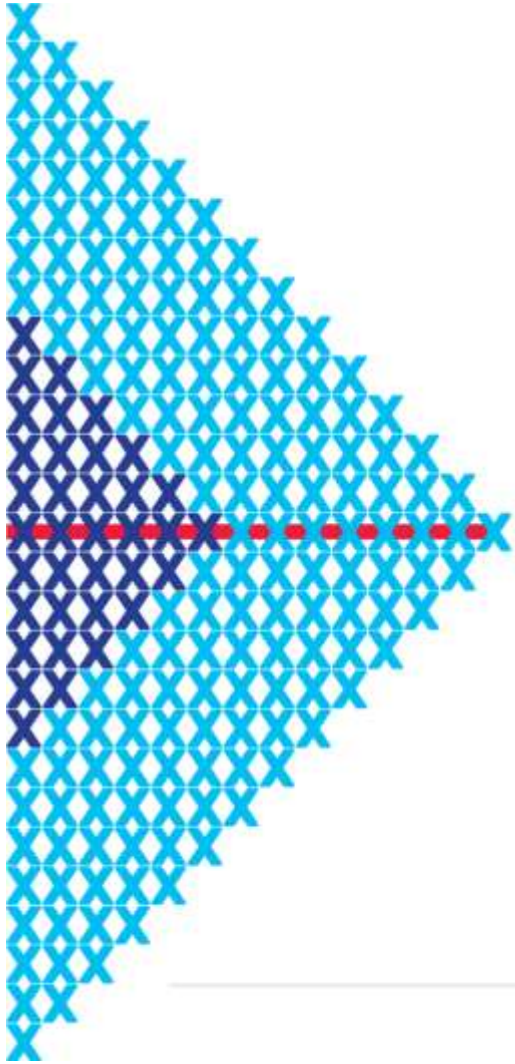
Day	2021	2023	2024	Grand Total
Mon	2	1		3
Wed	1			1
Thu			1	1
Sat			1	1
Grand Total	**3**	**1**	**2**	**6**

Start time	2021	2023	2024	Grand Total
4am-4.59am			1	1
5pm-5.59pm		1		1
7pm-7.59pm	3		1	4
Grand Total	**3**	**1**	**2**	**6**

NZ Deprivation Index 2023	2021	2023	2024	Grand Total
7	3	1	2	6
Grand Total	**3**	**1**	**2**	**6**

Scene type	2021	2023	2024	Grand Total
Residential	3	1	2	6
Grand Total	**3**	**1**	**2**	**6**

220

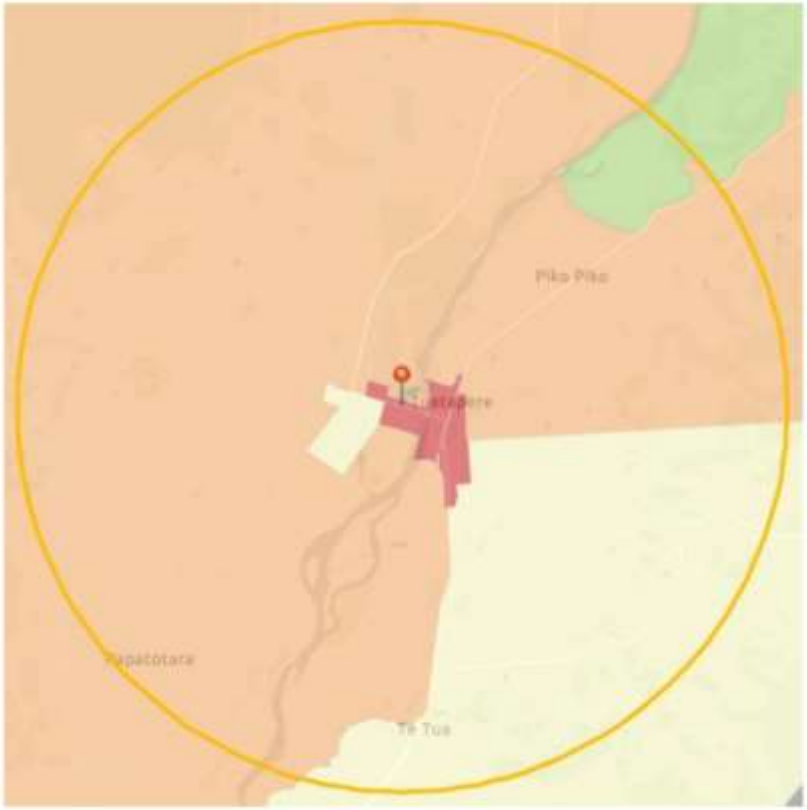


Tuatapere

Within 5km of the intersection of Peace Street and State Highway 99

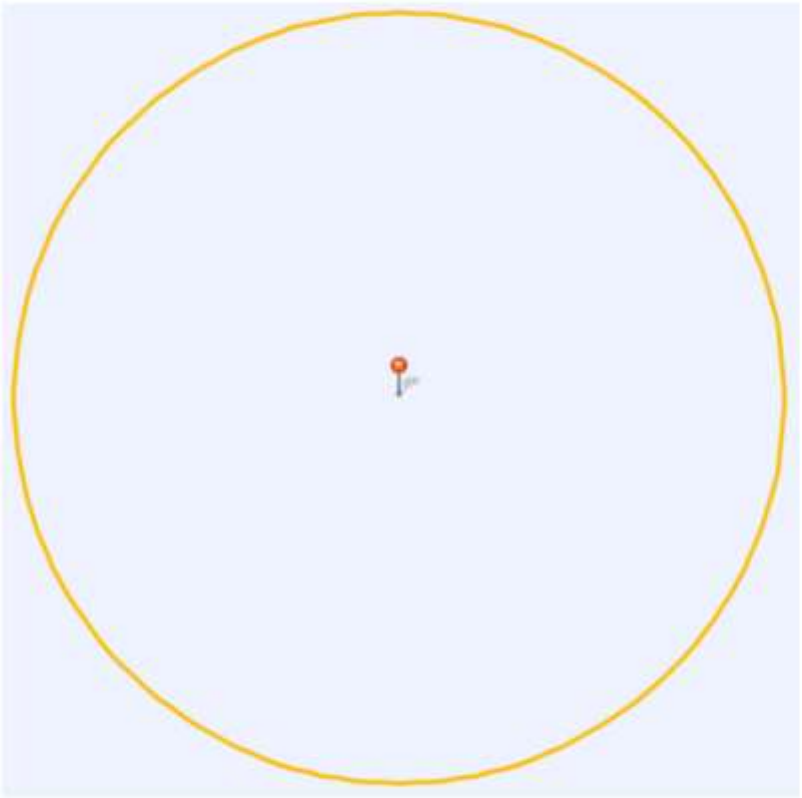
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

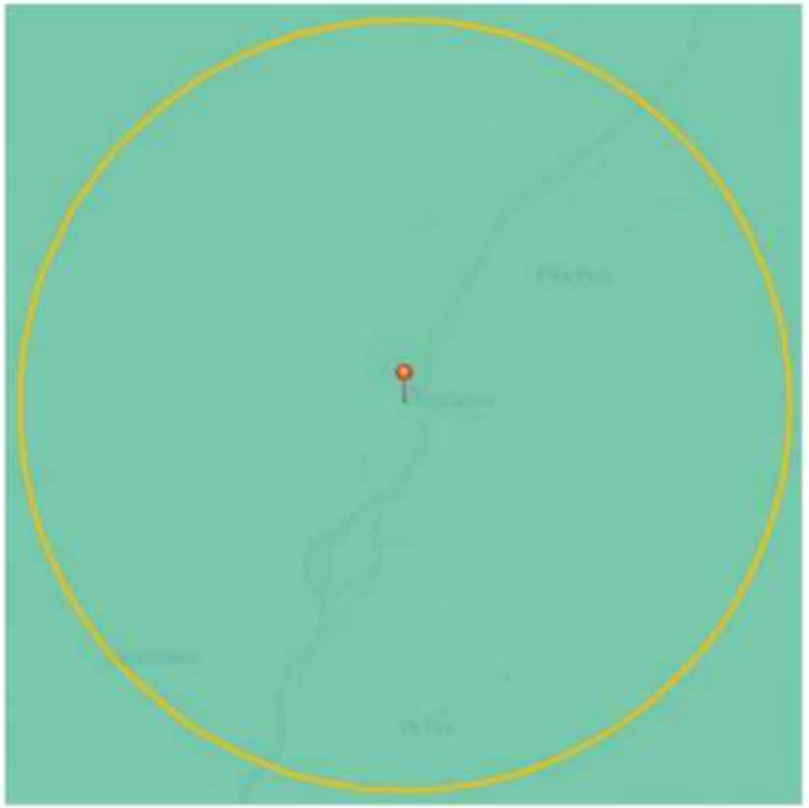
NZ Deprivation Index 2023 and alcohol ban area/s in Tuatapere



222

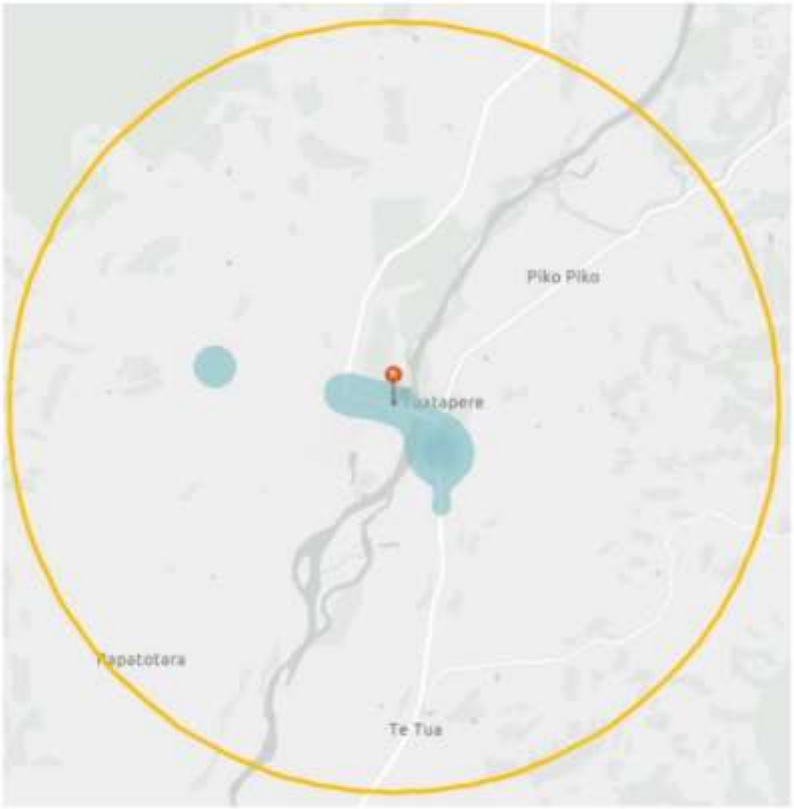
Sum of NZ Crime Harm Index scores – Tuatapere





223

Police recorded alcohol-related harm in Tuatapere



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Longwood Forest	19	14	18	28	11	9	99
Grand Total	**19**	**14**	**18**	**28**	**11**	**9**	**99**

224

Police recorded alcohol-related harm in Tuatapere

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON	2		1	1		1	5
ACTS INTENDED TO CAUSE INJURY	9	3		9	4	1	26
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS				1	2		3
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES			1				1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION	3	1					4
PUBLIC ORDER OFFENCES		1	1	2	3		7
SEXUAL ASSAULT AND RELATED OFFENCES		1	1				2
THEFT AND RELATED OFFENCES			1			3	4
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	4	4	4	2		15
UNKNOWN ANZSOC DIVISION	4	4	9	11		2	30
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER						2	2
Grand Total	**19**	**14**	**18**	**28**	**11**	**9**	**99**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan			1	5		1	7
Feb			1	2		5	8
Mar		4	2	4	1	2	13
Apr				3		1	4
May				1	1		2
Jun		1	2	4	1		8
Jul	3	1	1	1	1		7
Aug	3	2	1	1			7
Sep	10	2	4	5	1		22
Oct		2	3	1	1		7
Nov	2	1	2	1	3		9
Dec	1	1	1		2		5
Grand Total	**19**	**14**	**18**	**28**	**11**	**9**	**99**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			2	8		6	16
Tue	1	2		1	5		9
Wed	1	2	2	2			7
Thu	4	1	3	4	2		14
Fri		4		2	3		9
Sat	2	4	8	8		3	25
Sun	11	1	3	3	1		19
Grand Total	**19**	**14**	**18**	**28**	**11**	**9**	**99**

225

Police recorded alcohol-related harm in Tuatapere

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1			2			3
1am-1.59am				4	1		5
2am-2.59am			3				3
3am-3.59am				2			2
5am-5.59am						2	2
6am-6.59am		1					1
7am-7.59am				2			2
8am-8.59am			1				1
10am-10.59am					1		1
11am-11.59am	2			1			3
12pm-12.59pm	1	1	1	1	1		5
1pm-1.59pm		1		3			4
3pm-3.59pm		1					1
4pm-4.59pm			1				1
5pm-5.59pm	3		1			1	5
6pm-6.59pm	10	2	1	3	5		21
7pm-7.59pm	1	2	1	2			6
8pm-8.59pm		4	1	4			9
9pm-9.59pm			1	2		5	8
10pm-10.59pm	1		5	1	2	1	10
11pm-11.59pm		2	2	1	1		6
Grand Total	**19**	**14**	**18**	**28**	**11**	**9**	**99**

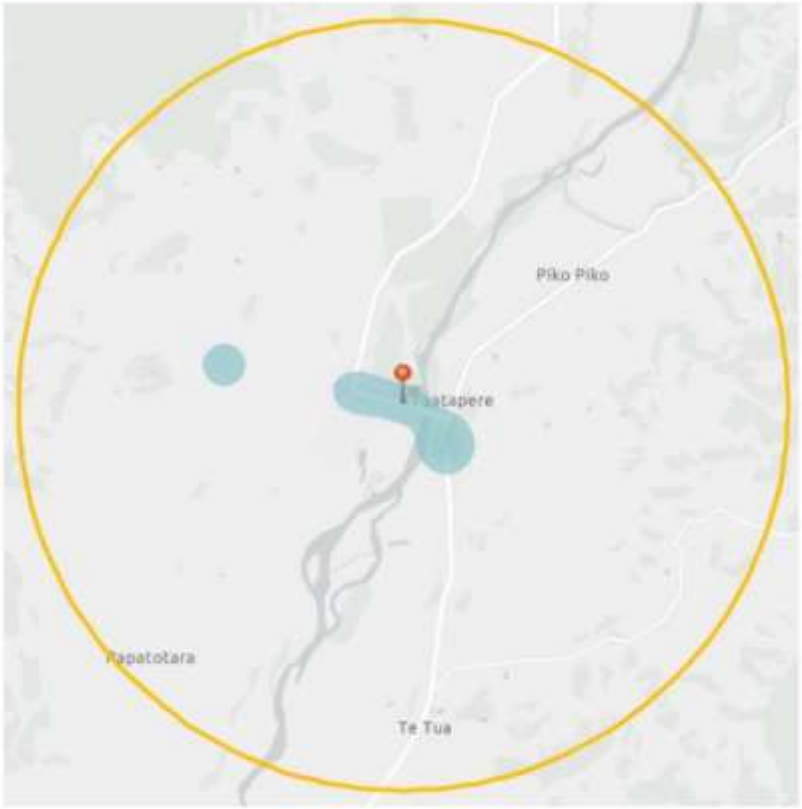
NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5		1	1				2
6	5		3	6			14
7	9	1	1	1	1		13
8	2		2	1	3	1	9
9	3	12	11	20	7	8	61
Grand Total	**19**	**14**	**18**	**28**	**11**	**9**	**99**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial		1	1	2	2		6
Community				1			1
In Transit			1				1
Not Applicable				1			1
Public Space	2	4	8	6	5	1	26
Residential	17	9	8	18	4	8	64
Grand Total	**19**	**14**	**18**	**28**	**11**	**9**	**99**

Police recorded alcohol-related harm in outdoor public places, in Tuatapere

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan						1	1
Feb			1				1
Mar		1	1	3			5
Jun			1	1			2
Jul			1				1
Aug	2	1					3
Sep			2	1			3
Oct		2		1	1		4
Nov			2		3		5
Dec					1		1
Grand Total	**2**	**4**	**8**	**6**	**5**	**1**	**26**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			1	1			2
Tue					5		5
Wed			2	1			3
Thu		1	1	1			3
Fri		1					1
Sat		2	4	2		1	9
Sun	2			1			3
Grand Total	**2**	**4**	**8**	**6**	**5**	**1**	**26**



227

Police recorded alcohol-related harm in outdoor public places, in Tuatapere

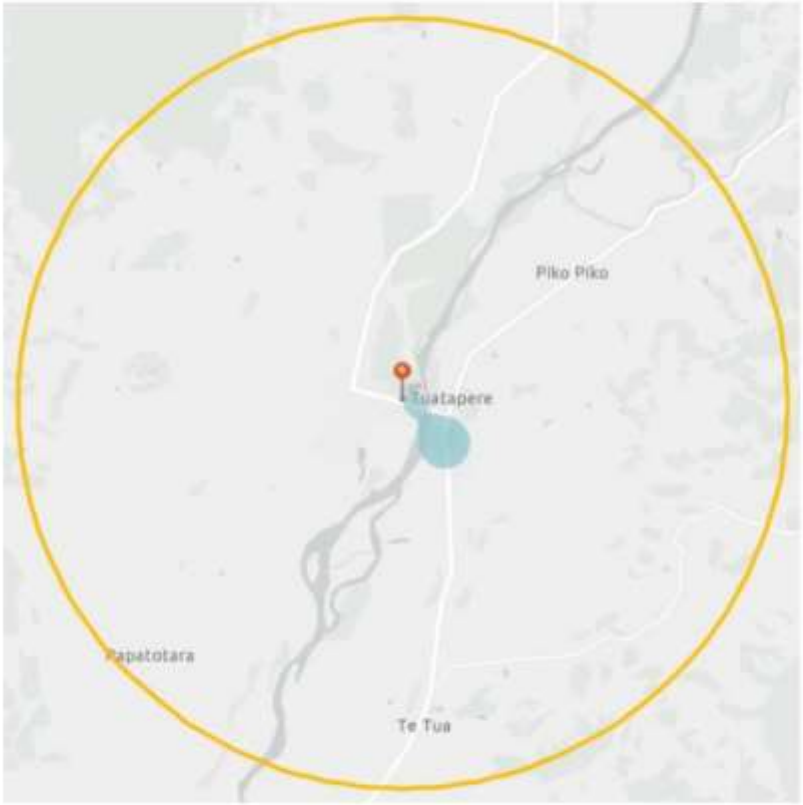
Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A			1			1	2
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS					2		2
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES			1				1
PUBLIC ORDER OFFENCES				1	1		2
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	4	3	4	2		14
UNKNOWN ANZSOC DIVISION	1		3	1			5
Grand Total	**2**	**4**	**8**	**6**	**5**	**1**	**26**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am				1			1
2am-2.59am			2				2
8am-8.59am			1				1
11am-11.59am	2						2
1pm-1.59pm		1		1			2
4pm-4.59pm			1				1
5pm-5.59pm			1				1
6pm-6.59pm				1	4		5
7pm-7.59pm		1	1	1			3
8pm-8.59pm			1	1			2
9pm-9.59pm				1			1
10pm-10.59pm			1			1	2
11pm-11.59pm		2			1		3
Grand Total	**2**	**4**	**8**	**6**	**5**	**1**	**26**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5			1				1
6	2		2				4
8			1	1	3	1	6
9		4	4	5	2		15
Grand Total	**2**	**4**	**8**	**6**	**5**	**1**	**26**

228

Drink driving in Tuatapere



Division	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
TRAFFIC AND VEHICLE REGULATORY OFFENCES	1	3	4	3	2	13
Grand Total	**1**	**3**	**4**	**3**	**2**	**13**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Feb			1			1
Mar			1	1		2
Jun			1	1		2
Jul			1			1
Aug	1	1				2
Oct		2		1	1	4
Nov					1	1
Grand Total	**1**	**3**	**4**	**3**	**2**	**13**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Tue					2	2
Wed				1		1
Thu		1		1		2
Sat		2	4	1		7
Sun	1					1
Grand Total	**1**	**3**	**4**	**3**	**2**	**13**

229

Drink driving in Tuatapere

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
11am-11.59am	1					1
1pm-1.59pm		1		1		2
5pm-5.59pm			1			1
6pm-6.59pm					2	2
7pm-7.59pm			1	1		2
8pm-8.59pm			1			1
9pm-9.59pm				1		1
10pm-10.59pm			1			1
11pm-11.59pm		2				2
Grand Total	**1**	**3**	**4**	**3**	**2**	**13**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
5			1			1
6	1					1
8				1	1	2
9		3	3	2	1	9
Grand Total	**1**	**3**	**4**	**3**	**2**	**13**

230

Police recorded alcohol-related family harm, in Tuatapere

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Longwood Forest	14	6	7	18	3	3	51
Grand Total	**14**	**6**	**7**	**18**	**3**	**3**	**51**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan				2			2
Feb				2			2
Mar		3	1		1	2	7
Apr				3		1	4
May				1	1		2
Jun				2			2
Jul	3			1	1		5
Aug			1	1			2
Sep	10	1	4	5			20
Oct			1				1
Nov		1		1			2
Dec	1	1					2
Grand Total	**14**	**6**	**7**	**18**	**3**	**3**	**51**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			1	7		1	9
Tue	1	1					2
Wed	1	1		1			3
Thu	3		2	2			7
Fri		3		1	3		7
Sat			1	4		2	7
Sun	9	1	3	3			16
Grand Total	**14**	**6**	**7**	**18**	**3**	**3**	**51**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON	2			1			3
ACTS INTENDED TO CAUSE INJURY	9	2		9	3	1	24
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION	3	1					4
SEXUAL ASSAULT AND RELATED OFFENCES		1					1
UNKNOWN ANZSOC DIVISION		2	7	8		2	19
Grand Total	**14**	**6**	**7**	**18**	**3**	**3**	**51**

231

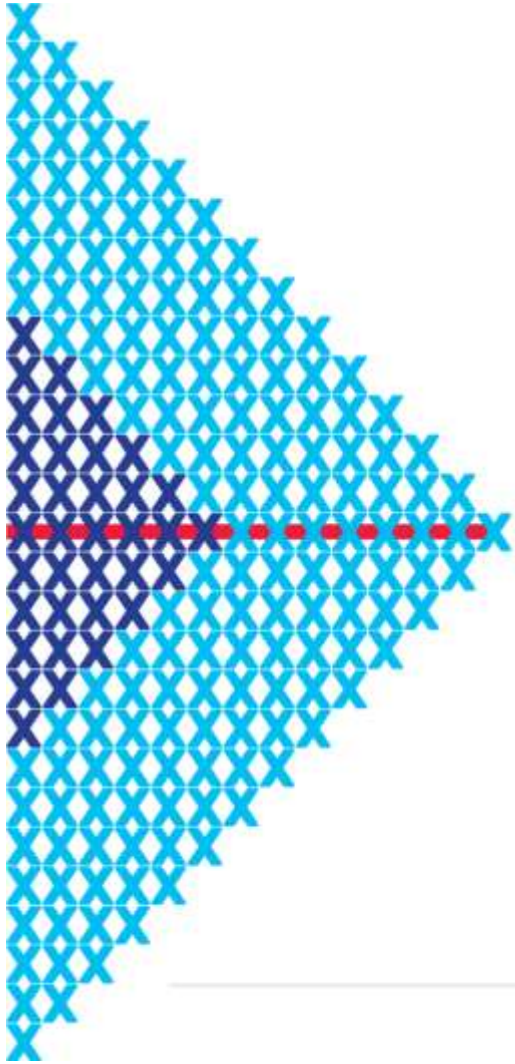
Police recorded alcohol-related family harm, in Tuatapere

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am				1			1
1am-1.59am				4			4
2am-2.59am			1				1
3am-3.59am				2			2
5am-5.59am						2	2
7am-7.59am				2			2
8am-8.59am			1				1
12pm-12.59pm		1		1			2
1pm-1.59pm				2			2
4pm-4.59pm			1				1
5pm-5.59pm	3					1	4
6pm-6.59pm	10	1		2	1		14
7pm-7.59pm				1			1
8pm-8.59pm		4		1			5
9pm-9.59pm			1				1
10pm-10.59pm	1		3	1	2		7
11pm-11.59pm				1			1
Grand Total	**14**	**6**	**7**	**18**	**3**	**3**	**51**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5		1					1
6	3		1	6			10
7	9		1		1		11
8	1		1				2
9	1	5	4	12	2	3	27
Grand Total	**14**	**6**	**7**	**18**	**3**	**3**	**51**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial				2			2
Public Space			2	1			3
Residential	14	6	5	15	3	3	46
Grand Total	**14**	**6**	**7**	**18**	**3**	**3**	**51**

232

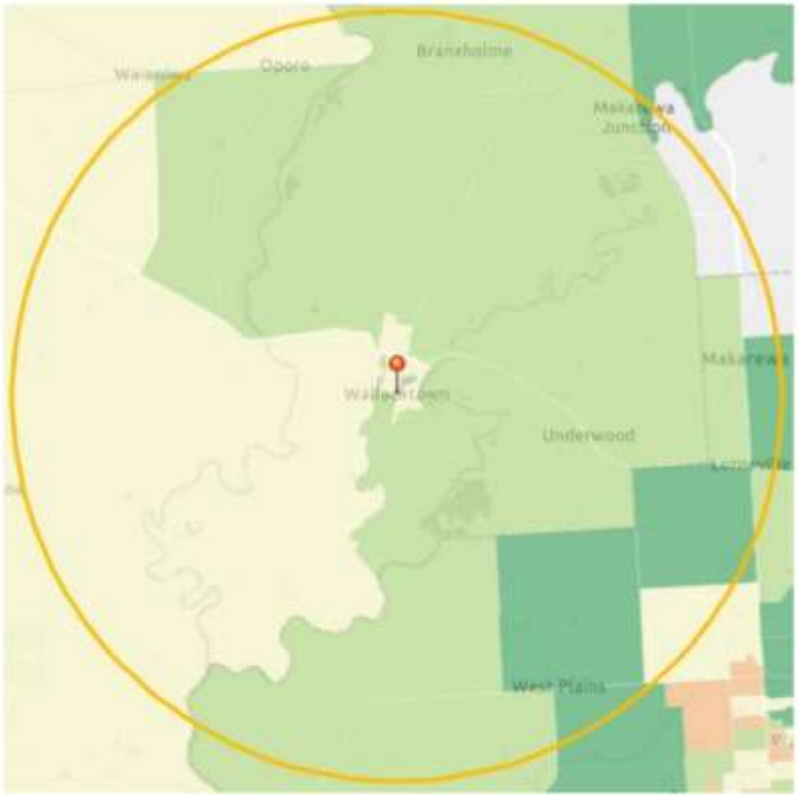


Wallacetown

Within 5km of the intersection of Kirkbride and Dunlop Streets

NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

NZ Deprivation Index 2023 and alcohol ban area/s in Wallacetown

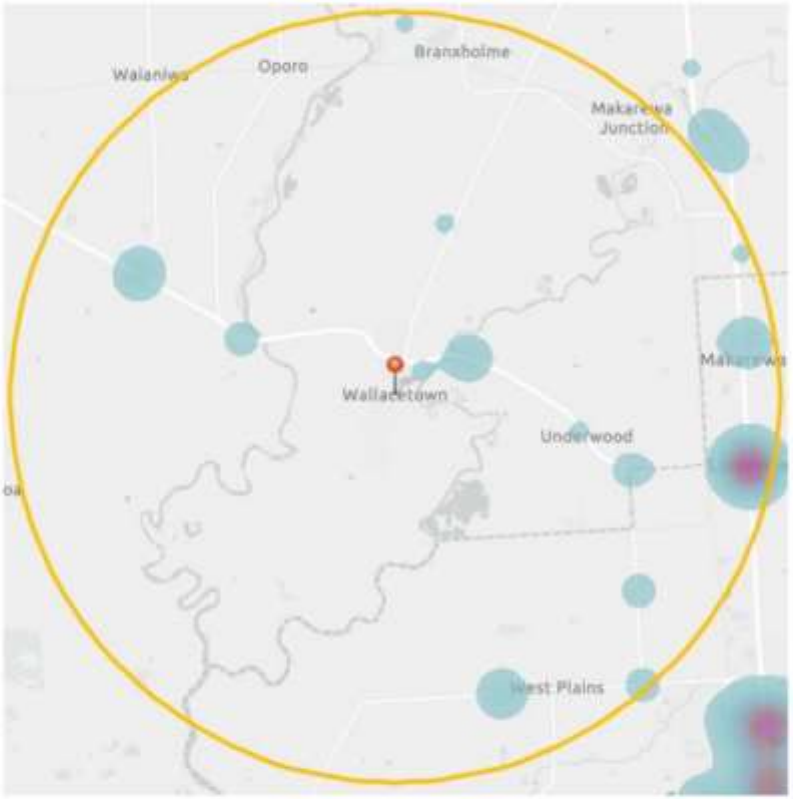


234

Sum of NZ Crime Harm Index scores – Wallacetown

235

Police recorded alcohol-related harm in Wallacetown



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
West Plains-Makarewa	14	12	32	25	18	7	108
Wallacetown	6	8	15	10	6	3	48
Waianiwa	2				3		5
Grove Bush			2				2
Grand Total	**22**	**20**	**49**	**35**	**27**	**10**	**163**

Police recorded alcohol-related harm in Wallacetown

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON			2	2	1		5
ACTS INTENDED TO CAUSE INJURY	1	3	9	2	3	2	20
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		1	2	6	2	1	12
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS	1	4		4	2		11
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES			1	2			3
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION	1	1	3		1		6
PUBLIC ORDER OFFENCES			3	2	1		6
THEFT AND RELATED OFFENCES			2	1	1	1	5
TRAFFIC AND VEHICLE REGULATORY OFFENCES	12	7	17	14	11	5	66
UNKNOWN ANZSOC DIVISION	7	3	7	1	5	1	24
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER		1	3	1			5
Grand Total	**22**	**20**	**49**	**35**	**27**	**10**	**163**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		3	5		3	1	12
Feb		2	7	3	3	6	21
Mar		4	3	7	1	2	17
Apr		5	6	4	1	1	17
May		1	2	2	4		9
Jun			2	1	1		4
Jul	1	3	3	1	2		10
Aug	6	1	2		1		10
Sep	4	1	3	4	1		13
Oct	4		3	4	5		16
Nov	2		1		1		4
Dec	5		12	9	4		30
Grand Total	**22**	**20**	**49**	**35**	**27**	**10**	**163**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	2	4	4			1	11
Tue		2	2	6		1	11
Wed	4	5	3		3	2	17
Thu			7		5		12
Fri	8	3	12	8	3		34
Sat	4	1	11	17	9	5	47
Sun	4	5	10	4	7	1	31
Grand Total	**22**	**20**	**49**	**35**	**27**	**10**	**163**

237

Police recorded alcohol-related harm in Wallacetown

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	5	4	3	3		17
1am-1.59am		2	1		2		5
2am-2.59am		1	5	1	3		10
3am-3.59am	2		1	4		1	8
5am-5.59am					1		1
6am-6.59am					1		1
8am-8.59am					1		1
9am-9.59am			1				1
10am-10.59am					2		2
11am-11.59am	2		2				4
1pm-1.59pm		1	3	1	1		6
2pm-2.59pm					1		1
3pm-3.59pm	1				1		2
4pm-4.59pm		7				2	9
5pm-5.59pm		1	5			2	8
6pm-6.59pm	1		6	1		5	13
7pm-7.59pm			1	7	2		10
8pm-8.59pm			7	1	6		14
9pm-9.59pm	6		6	10	1		23
10pm-10.59pm	4	2	3	3			12
11pm-11.59pm	4	1	4	4	2		15
Grand Total	**22**	**20**	**49**	**35**	**27**	**10**	**163**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	2		8	8	2		20
2	5	6	6	6	6	2	31
3	8	10	13	12	17	8	68
4	4	3	12	3	1		23
5	1		3	3	1		8
6	2	1	7	3			13
Grand Total	**22**	**20**	**49**	**35**	**27**	**10**	**163**

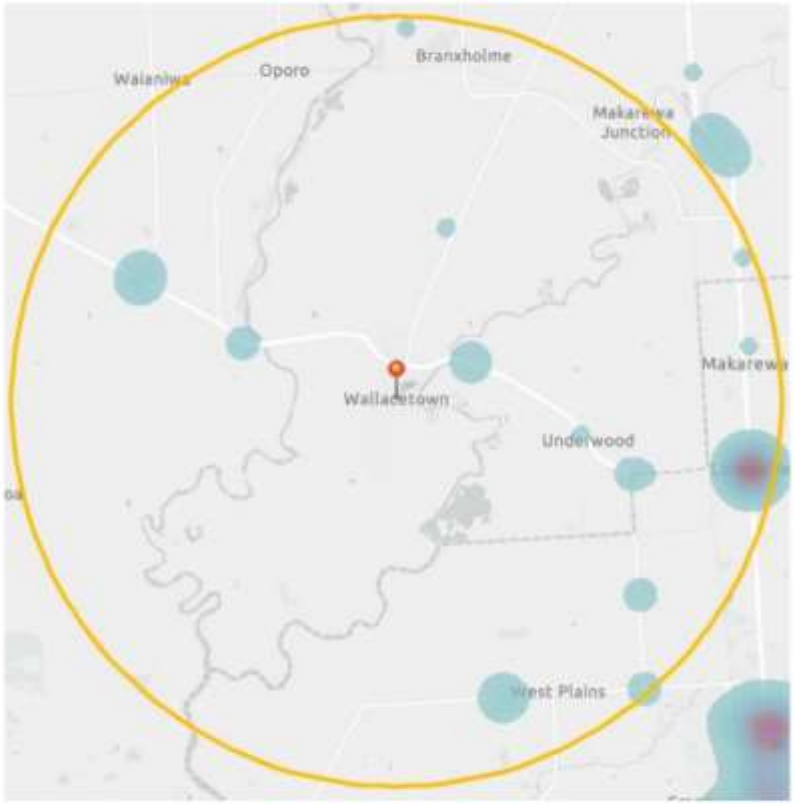
Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial			2	1			3
Community			4				4
In Transit			1		1		2
Online					1		1
Public Space	17	10	23	23	17	6	96
Residential	4	10	12	11	7	4	48
Retail	1		7		1		9
Grand Total	**22**	**20**	**49**	**35**	**27**	**10**	**163**

238

Police recorded alcohol-related harm in outdoor public places, in Wallacetown

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2	4		3		9
Feb		1	2	2	3	5	13
Mar		3	1	7		1	12
Apr			3	1			4
May		1		2	1		4
Jun			1		1		2
Jul		1	1	1	2		5
Aug	6	1	1		1		9
Sep	2	1	2	2			7
Oct	4			4	1		9
Nov	2				1		3
Dec	3		8	4	4		19
Grand Total	**17**	**10**	**23**	**23**	**17**	**6**	**96**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	2	1	2				5
Tue		1		3			4
Wed	2					1	3
Thu			2		5		7
Fri	7	3	5	6	3		24
Sat	4		8	12	4	5	33
Sun	2	5	6	2	5		20
Grand Total	**17**	**10**	**23**	**23**	**17**	**6**	**96**



239

Police recorded alcohol-related harm in outdoor public places, in Wallacetown

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A			2				2
ACTS INTENDED TO CAUSE INJURY		1	2				3
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		1	2	6	2	1	12
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS	1			2	2		5
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION			1				1
PUBLIC ORDER OFFENCES				2	1		3
TRAFFIC AND VEHICLE REGULATORY OFFENCES	12	7	13	13	10	5	60
UNKNOWN ANZSOC DIVISION	4	1	3		2		10
Grand Total	**17**	**10**	**23**	**23**	**17**	**6**	**96**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	3	1	3	3		12
1am-1.59am		1	1		1		3
2am-2.59am		1	1				2
3am-3.59am	2		1	2			5
5am-5.59am					1		1
6am-6.59am					1		1
8am-8.59am					1		1
11am-11.59am	2						2
1pm-1.59pm			3	1	1		5
3pm-3.59pm					1		1
4pm-4.59pm		2				1	3
5pm-5.59pm		1				2	3
6pm-6.59pm			6			3	9
7pm-7.59pm			1	5			6
8pm-8.59pm			2	1	6		9
9pm-9.59pm	5		5	5			15
10pm-10.59pm	4	1	1	3			9
11pm-11.59pm	2	1	1	3	2		9
Grand Total	**17**	**10**	**23**	**23**	**17**	**6**	**96**

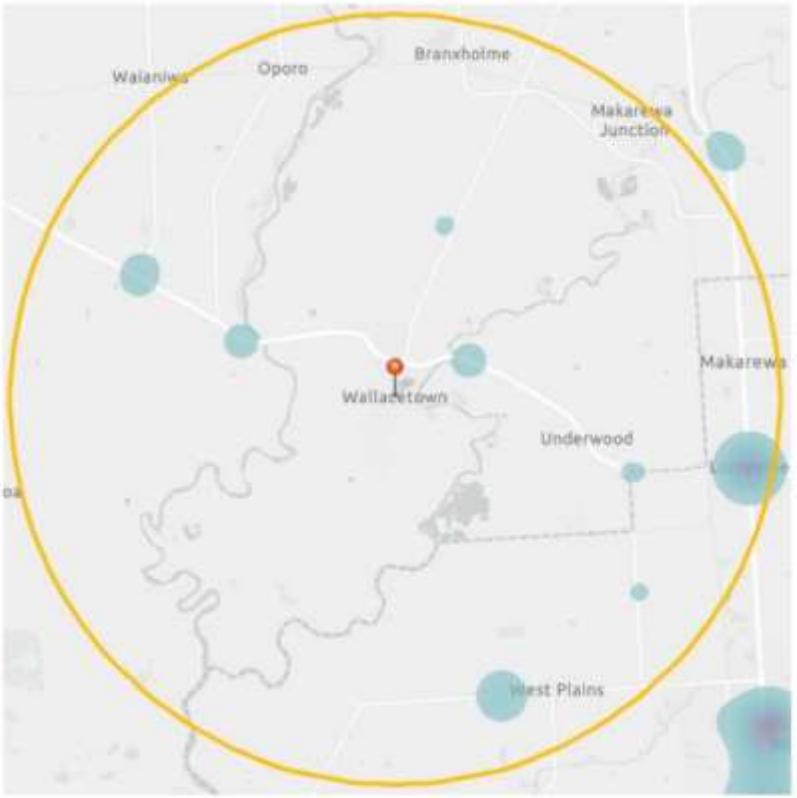
NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	2		3	8	2		15
2	2		1	2	2		7
3	8	7	8	9	12	6	50
4	3	2	2	3			10
5			3	1	1		5
6	2	1	6				9
Grand Total	**17**	**10**	**23**	**23**	**17**	**6**	**96**

240

Drink driving in Wallacetown

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2	2		1		5
Feb			3	1	3	5	12
Mar			1	4			5
Apr			1	1			2
May		1		1	1		3
Jun			1				1
Jul		1	1	1	1		4
Aug	3	1	1		1		6
Sep	1	1	1	1			4
Oct	2		1		1		4
Nov	1				1		2
Dec	1		2	2	3		8
Grand Total	**8**	**6**	**14**	**11**	**12**	**5**	**56**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	1	2				4
Tue				2			2
Wed	1						1
Thu					4		4
Fri	3	3	5	4	3		18
Sat	2		5	3	3	5	18
Sun	1	2	2	2	2		9
Grand Total	**8**	**6**	**14**	**11**	**12**	**5**	**56**



Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS				1	1		2
TRAFFIC AND VEHICLE REGULATORY OFFENCES	8	6	14	10	11	5	54
Grand Total	**8**	**6**	**14**	**11**	**12**	**5**	**56**

241

Drink driving in Wallacetown

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1		2	2	1		6
1am-1.59am		1	1		1		3
2am-2.59am		1					1
3am-3.59am	1		1	1			3
5am-5.59am					1		1
6am-6.59am					1		1
11am-11.59am	1						1
1pm-1.59pm			1	1	1		3
3pm-3.59pm					1		1
4pm-4.59pm		1					1
5pm-5.59pm		1	1			2	4
6pm-6.59pm			1			3	4
7pm-7.59pm			1	2			3
8pm-8.59pm				1	5		6
9pm-9.59pm	2		3				5
10pm-10.59pm	2	1	1	1			5
11pm-11.59pm	1	1	2	3	1		8
Grand Total	**8**	**6**	**14**	**11**	**12**	**5**	**56**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	1		1	2			4
2	1		1	1	1		4
3	4	4	4	6	11	5	34
4	1	1	4	1			7
5			2	1			3
6	1	1	2				4
Grand Total	**8**	**6**	**14**	**11**	**12**	**5**	**56**

242

Police recorded alcohol-related family harm, in Wallacetown

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
West Plains-Makarewa	3	6	8		3	1	21
Wallacetown	1	2	2	4	1	1	11
Waianiwa					2		2
Grand Total	**4**	**8**	**10**	**4**	**6**	**2**	**34**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan			1			1	2
Mar		1	1				2
Apr		5		3	1	1	10
May					3		3
Jul		2	1				3
Sep	2		1				3
Oct					2		2
Dec	2		6	1			9
Grand Total	**4**	**8**	**10**	**4**	**6**	**2**	**34**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON				1			1
ACTS INTENDED TO CAUSE INJURY	1	2	5	2	3	1	14
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		4					4
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES				1			1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION	1	1					2
PUBLIC ORDER OFFENCES			1				1
UNKNOWN ANZSOC DIVISION	2	1	4		3	1	11
Grand Total	**4**	**8**	**10**	**4**	**6**	**2**	**34**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		2	1			1	4
Tue		1		3		1	5
Wed	2	5			2		9
Thu			6				6
Fri	1		1	1			3
Sat			1		4		5
Sun	1		1				2
Grand Total	**4**	**8**	**10**	**4**	**6**	**2**	**34**

243

Police recorded alcohol-related family harm, in Wallacetown

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am		2					2
1am-1.59am		1					1
2am-2.59am			1		3		4
3am-3.59am						1	1
9am-9.59am			1				1
10am-10.59am					2		2
11am-11.59am			1				1
2pm-2.49pm					1		1
4pm-4.59pm		5					5
6pm-6.59pm	1					1	2
8pm-8.59pm			6				6
9pm-9.59pm	1			3			4
10pm-10.59pm			1				1
11pm-11.59pm	2			1			3
Grand Total	**4**	**8**	**10**	**4**	**6**	**2**	**34**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1			6				6
2	3	6	1		3	1	14
3		2	3		2	1	8
4					1		1
5	1			1			2
6				3			3
Grand Total	**4**	**8**	**10**	**4**	**6**	**2**	**34**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Community			4				4
Public Space			3				3
Residential	4	8	3	4	6	2	27
Grand Total	**4**	**8**	**10**	**4**	**6**	**2**	**34**

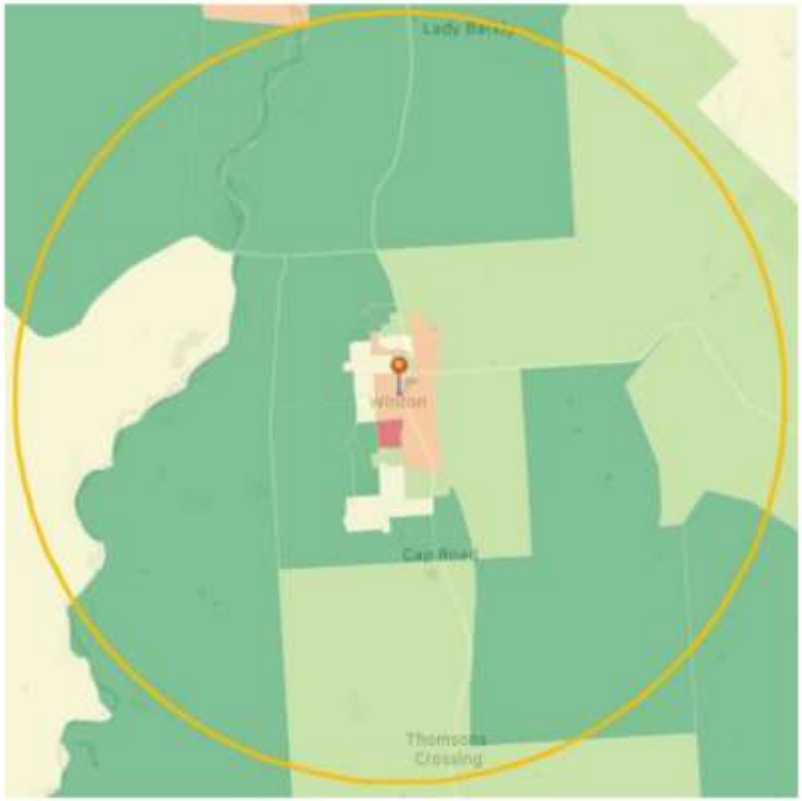
244

Winton

Within 5km of the intersection of Great North Road and Meldrum Street

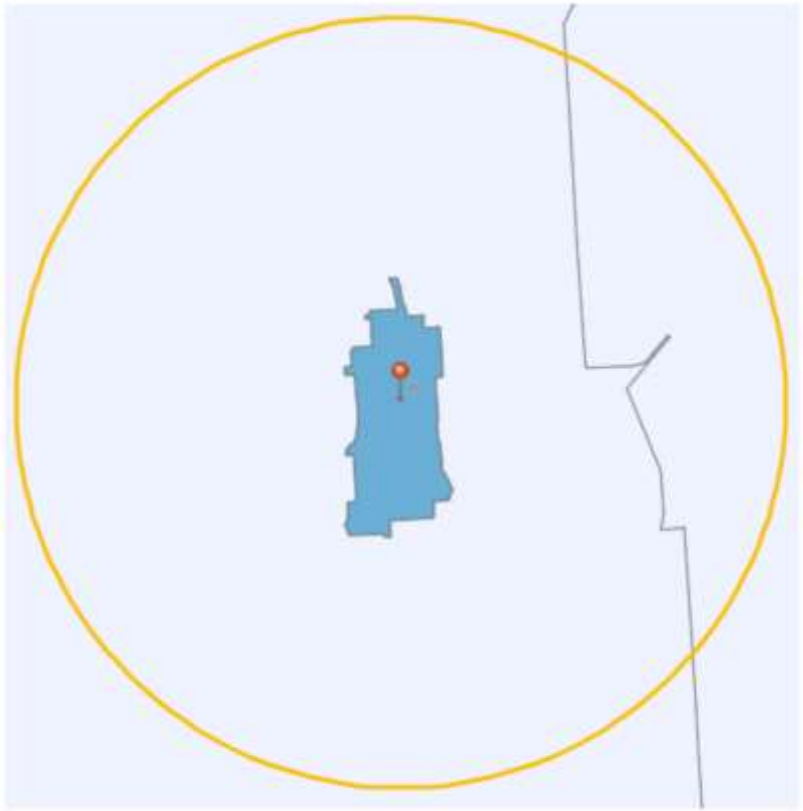
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

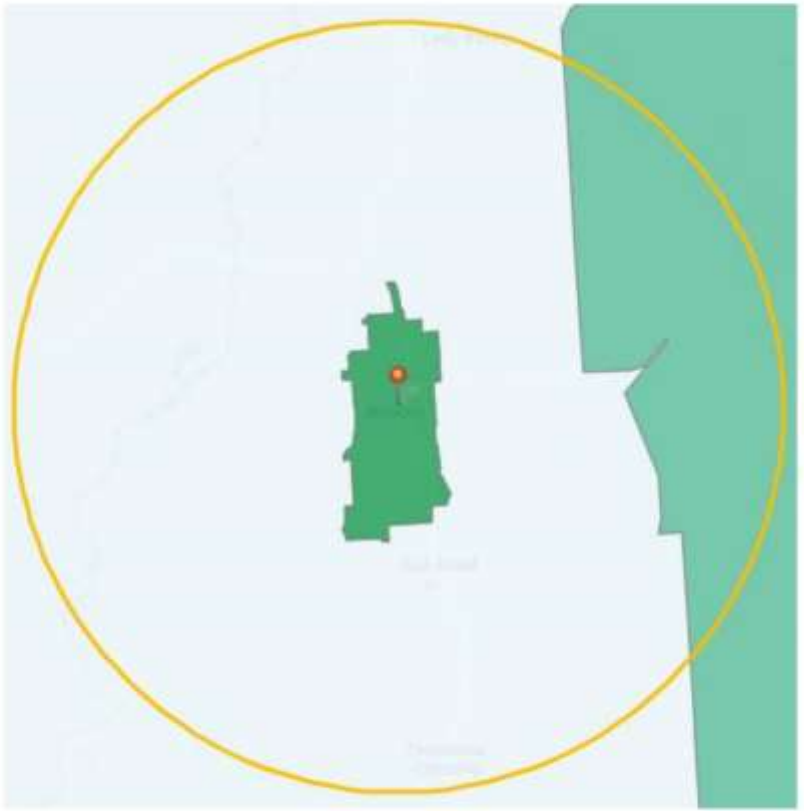
NZ Deprivation Index 2023 and alcohol ban area/s in Winton



246

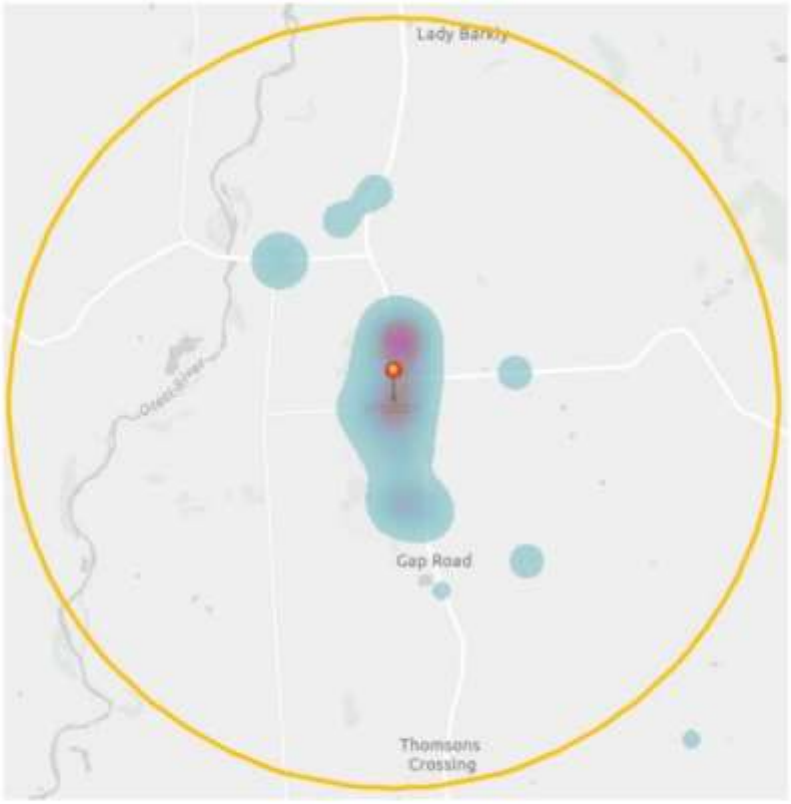
Sum of NZ Crime Harm Index scores – Winton





247

Police recorded alcohol-related harm in Winton



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Winton	29	34	64	61	49	19	256
Oreti River	6	2	7	2	13	7	37
Hedgehope					6		6
Grand Total	**35**	**36**	**71**	**63**	**68**	**26**	**299**

248

Police recorded alcohol-related harm in Winton

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		1	4	6	2	1	14
ACTS INTENDED TO CAUSE INJURY	5	5	9	6	4	4	33
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS			2	2	1		5
FRAUD, DECEPTION AND RELATED OFFENCES		1		1			2
ILLICIT DRUG OFFENCES		1			1	1	3
MISCELLANEOUS OFFENCES		1	1				2
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS	1			2	4	1	8
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES	1	1	1		1		4
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1	1	3	2	1	8
PUBLIC ORDER OFFENCES	3	2		4	2	1	12
SEXUAL ASSAULT AND RELATED OFFENCES		1			5		6
THEFT AND RELATED OFFENCES	1	1		2	1	1	6
TRAFFIC AND VEHICLE REGULATORY OFFENCES	16	15	27	27	20	9	114
UNKNOWN ANZSOC DIVISION	8	6	25	10	24	7	80
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER			1		1		2
Grand Total	**35**	**36**	**71**	**63**	**68**	**26**	**299**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		2	6	8	2	6	24
Feb		4	1	5	10	2	22
Mar		14	5	3	10	4	36
Apr			4	5	8	6	23
May			7	3	6	8	24
Jun		3	7	3	4		17
Jul	7	4	9	14	3		37
Aug	3	2	6	3	5		19
Sep	9	1	4	5	7		26
Oct	9		3	4	5		21
Nov	2	3	11	2	2		20
Dec	5	3	8	8	6		30
Grand Total	**35**	**36**	**71**	**63**	**68**	**26**	**299**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1	1	6		3	1	12
Tue	2	2	5	4	2	2	17
Wed	3		11	4	6	3	27
Thu	1	3	15	7	3	6	35
Fri	5	8	12	18	15	6	64
Sat	15	14	13	18	28	8	96
Sun	8	8	9	12	11		48
Grand Total	**35**	**36**	**71**	**63**	**68**	**26**	**299**

249

Police recorded alcohol-related harm in Winton

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	2	4	3	10	1	22
1am-1.59am	4	2	4	4	9		23
2am-2.59am	2	3	3				8
3am-3.59am		1		4			5
4am-4.59am					1		1
7am-7.59am		1		1			2
8am-8.59am	1		1	1			3
9am-9.59am					2	1	3
10am-10.59am	1	2	2	1	1	1	8
11am-11.59am						1	1
12pm-12.59pm		1		1	1	1	4
1pm-1.59pm				1	1		2
2pm-2.59pm	1			1	1		3
3pm-3.59pm	1			2		1	4
4pm-4.59pm			6	4	2		12
5pm-5.59pm		3	8	4	2	1	18
6pm-6.59pm	3	1	4	3	4	4	19
7pm-7.59pm	4	5	10	5	6	1	31
8pm-8.59pm	5	5	9	8	5	4	36
9pm-9.59pm	2	3	7	8	10	1	31
10pm-10.59pm	5	5	5	5	8	4	32
11pm-11.59pm	4	2	8	7	5	5	31
Grand Total	**35**	**36**	**71**	**63**	**68**	**26**	**299**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	2	2	5	3	9	3	24
2	1		3	4	6	4	18
3	5	3	2	2	5		17
4	5	9	3	11	14	3	45
6	7	9	36	25	18	4	99
7	3		7	5	7	3	25
8	12	12	13	10	9	9	65
9		1	2	3			6
Grand Total	**35**	**36**	**71**	**63**	**68**	**26**	**299**

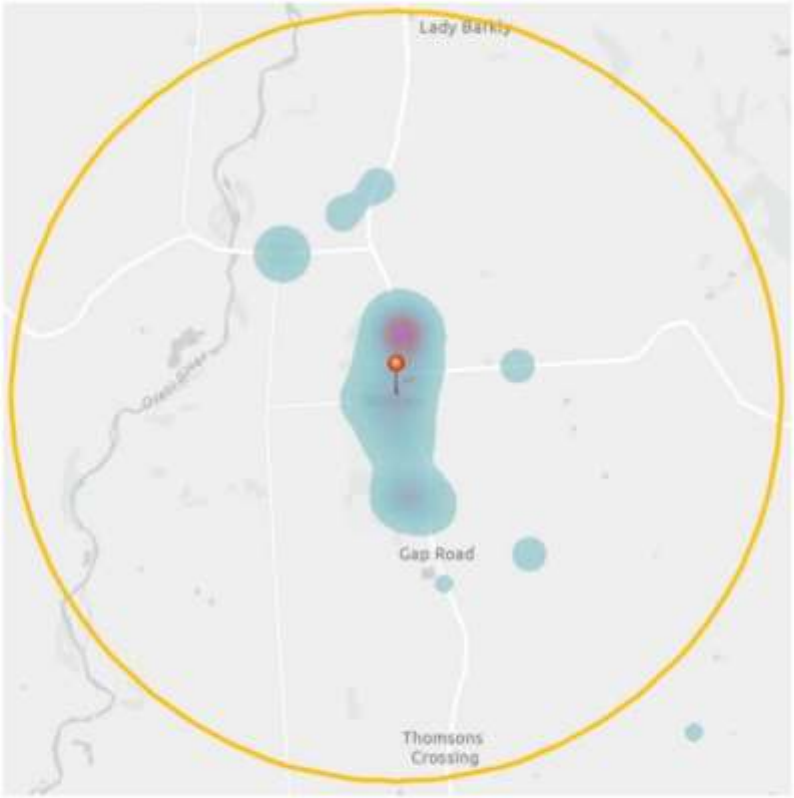
Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial	5	3	4	7	4		23
In Transit			2		1		3
Online		1	1	1		1	4
Public Space	25	20	35	35	38	14	167
Residential	4	10	29	19	25	9	96
Retail	1	2		1		1	5
Unknown						1	1
Grand Total	**35**	**36**	**71**	**63**	**68**	**26**	**299**

250

Police recorded alcohol-related harm in outdoor public places, in Winton

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan				4	1	2	7
Feb		3		3	9	2	17
Mar		11			3	3	17
Apr			4	4	3	2	13
May			7	2	2	5	16
Jun		1	5	1	2		9
Jul	5	3	5	7	1		21
Aug	3	1	2	2	4		12
Sep	8		1	2	6		17
Oct	4		3	3	3		13
Nov	2	1	7	1	2		13
Dec	3		1	6	2		12
Grand Total	**25**	**20**	**35**	**35**	**38**	**14**	**167**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1		2		1		4
Tue		1	1	1			3
Wed	1		6	2	4	2	15
Thu			9	5	1	5	20
Fri	5	2	7	10	9	3	36
Sat	10	13	5	13	17	4	62
Sun	8	4	5	4	6		27
Grand Total	**25**	**20**	**35**	**35**	**38**	**14**	**167**



251

Police recorded alcohol-related harm in outdoor public places, in Winton

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A			3	1			4
ACTS INTENDED TO CAUSE INJURY	2		1	1	1		5
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS			2	2	1		5
ILLICIT DRUG OFFENCES		1				1	2
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS	1				2		3
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES			1				1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION				1	1		2
PUBLIC ORDER OFFENCES		1			2	1	4
THEFT AND RELATED OFFENCES					1		1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	16	15	25	27	20	9	112
UNKNOWN ANZSOC DIVISION	6	3	3	3	10	3	28
Grand Total	**25**	**20**	**35**	**35**	**38**	**14**	**167**

252

Police recorded alcohol-related harm in outdoor public places, in Winton

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2	2	2	3	6	1	16
1am-1.59am	4	2			3		9
2am-2.59am	2	2	1				5
4am-4.59am					1		1
8am-8.59am			1	1			2
9am-9.59am					1		1
10am-10.59am	1	1	1				3
11am-11.59am						1	1
12pm-12.59pm					1	1	2
1pm-1.59pm				1	1		2
2pm-2.49pm				1			1
3pm-3.59pm				1			1
4pm-4.59pm			5	4	2		11
5pm-5.59pm			5	1	2		8
6pm-6.59pm	2	1	1	1	4	3	12
7pm-7.59pm	3	3	7	4	3	1	21
8pm-8.59pm	5	4	7	5	2	1	24
9pm-9.59pm	2	1	2	7	6	1	19
10pm-10.59pm	1	3		2	5	1	12
11pm-11.59pm	3	1	3	4	1	4	16
Grand Total	**25**	**20**	**35**	**35**	**38**	**14**	**167**

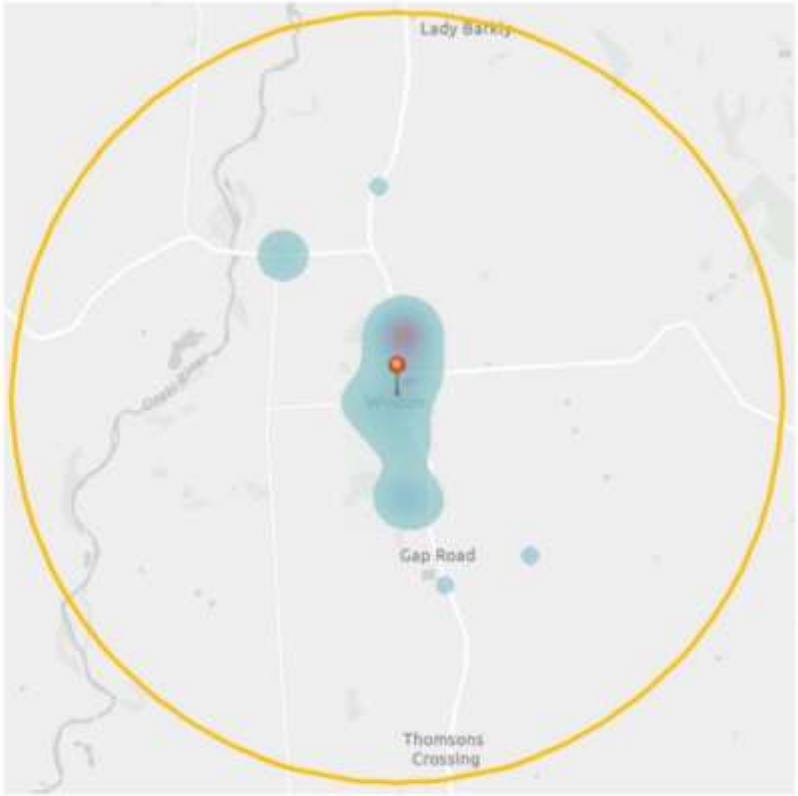
NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	2	2	4	1	7	3	19
2	1			2	3		6
3	5		2		3		10
4	5	7	3	7	7	2	31
6	4	5	16	18	12	3	58
7	3		1		1		5
8	5	6	7	5	5	6	34
9			2	2			4
Grand Total	**25**	**20**	**35**	**35**	**38**	**14**	**167**

253

Drink driving in Winton

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan				3	1	1	5
Feb		2		3	3		8
Mar		6			2	3	11
Apr			2	3		1	6
May			6	2	2	3	13
Jun		1	4	1			6
Jul	3	2	4	3			12
Aug	2	1	2	2	2		9
Sep	4		2	2	3		11
Oct	2		1	3	2		8
Nov	1	1	1		1		4
Dec			2	6	2		10
Grand Total	**12**	**13**	**24**	**28**	**18**	**8**	**103**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			1		1		2
Tue			1				1
Wed	1		1		2	1	5
Thu			5	5		1	11
Fri	2	2	6	8	4	2	24
Sat	5	8	6	11	10	4	44
Sun	4	3	4	4	1		16
Grand Total	**12**	**13**	**24**	**28**	**18**	**8**	**103**



Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS				1			1
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS					1		1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	12	13	24	27	17	8	101
Grand Total	**12**	**13**	**24**	**28**	**18**	**8**	**103**

254

Drink driving in Winton

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1	2	2	3	5	1	14
1am-1.59am	3	2			2		7
2am-2.59am	2	1	1				4
8am-8.59am			1	1			2
10am-10.59am		1	1				2
12pm-12.59pm					1		1
1pm-1.59pm				1			1
2pm-2.49pm				1			1
3pm-3.59pm				1			1
4pm-4.59pm			1	2	1		4
5pm-5.59pm			2	1			3
6pm-6.59pm	1		2	1	1		5
7pm-7.59pm	2	2	5	3	2	1	15
8pm-8.59pm	1	2	5	4	1	1	14
9pm-9.59pm	1	1	2	7	1	1	13
10pm-10.59pm		1		1	3	1	6
11pm-11.59pm	1	1	2	2	1	3	10
Grand Total	**12**	**13**	**24**	**28**	**18**	**8**	**103**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1	1	1	2	1	3	3	11
2				1	2		3
3	1		2		1		4
4	3	3	3	7	3	2	21
6	3	5	9	15	6	1	39
7	2		1				3
8	2	4	5	3	3	2	19
9			2	1			3
Grand Total	**12**	**13**	**24**	**28**	**18**	**8**	**103**

255

Police recorded alcohol-related family harm, in Winton

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Winton	4	7	26	14	11	9	71
Oreti River	3		1		1	3	8
Hedgehope					5		5
Grand Total	**7**	**7**	**27**	**14**	**17**	**12**	**84**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON		1	1	2	1	1	6
ACTS INTENDED TO CAUSE INJURY	3	3	6	3	1	4	20
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS	1			2	1	1	5
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION			1	2		1	4
PUBLIC ORDER OFFENCES	1						1
SEXUAL ASSAULT AND RELATED OFFENCES		1					1
TRAFFIC AND VEHICLE REGULATORY OFFENCES						1	1
UNKNOWN ANZSOC DIVISION	2	2	19	5	14	4	46
Grand Total	**7**	**7**	**27**	**14**	**17**	**12**	**84**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1	5	1		4	11
Feb		1	1	1	1		4
Mar			4	1	4		9
Apr				1	4	4	9
May					1	4	5
Jun		2	1	1	1		5
Jul	1		4	6	1		12
Aug			2	1			3
Sep	1		2		1		4
Nov			4	1	1		6
Dec	5	3	4	1	3		16
Grand Total	**7**	**7**	**27**	**14**	**17**	**12**	**84**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		1	3		2	1	7
Tue	2		4	1	2	1	10
Wed	1		3	2	1	1	8
Thu	1	2	6	1	1	1	12
Fri		3	3	2	1	4	13
Sat			6	2	4	4	16
Sun	3	1	2	6	6		18
Grand Total	**7**	**7**	**27**	**14**	**17**	**12**	**84**

256

Police recorded alcohol-related family harm, in Winton

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am			2				2
1am-1.59am			3	1	1		5
2am-2.59am			1				1
3am-3.59am				4			4
7am-7.59am		1		1			2
8am-8.59am	1						1
9am-9.59am					1		1
10am-10.59am						1	1
11am-11.59am						1	1
3pm-3.59pm	1					1	2
4pm-4.59pm			1				1
5pm-5.59pm		3	2			1	6
6pm-6.59pm	1		1		1	1	4
7pm-7.59pm		1	2	1	4		8
8pm-8.59pm	3		2	4	1	3	13
9pm-9.59pm		1	5	1	4		11
10pm-10.59pm			4	1	3	3	11
11pm-11.59pm	1	1	4	1	2	1	10
Grand Total	**7**	**7**	**27**	**14**	**17**	**12**	**84**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1			1	2	1		4
2			3		2	3	8
3	3	3					6
4					6		6
6	3	2	15	8	3	1	32
7			6	4	2	3	15
8	1	2	2		3	5	13
Grand Total	**7**	**7**	**27**	**14**	**17**	**12**	**84**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Online						1	1
Public Space	3			1	4	2	10
Residential	4	7	27	13	13	8	72
Unknown						1	1
Grand Total	**7**	**7**	**27**	**14**	**17**	**12**	**84**

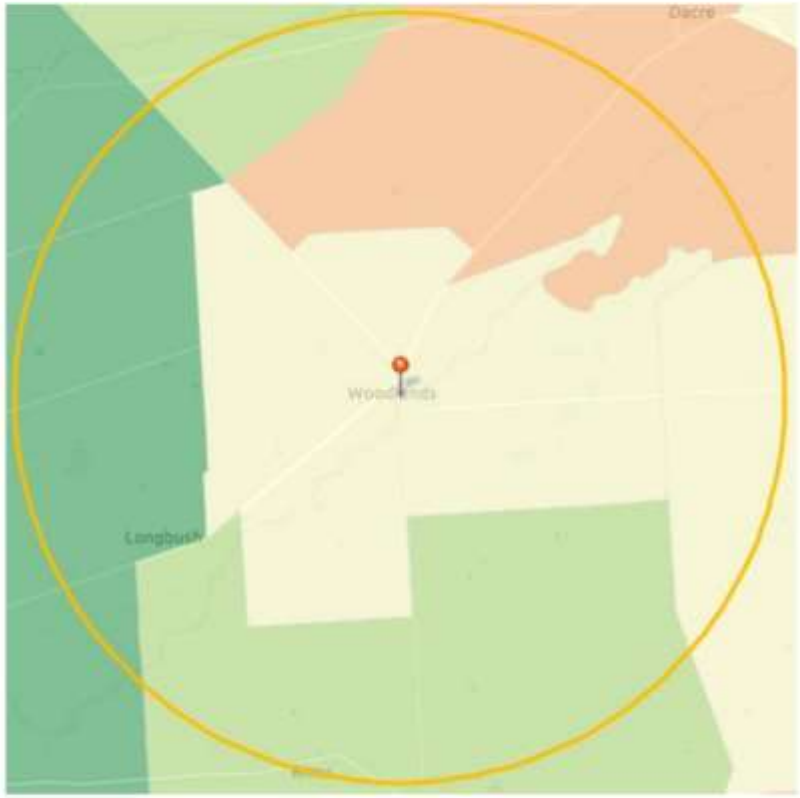
257

Woodlands

Within 5km of 16 Flemington Road

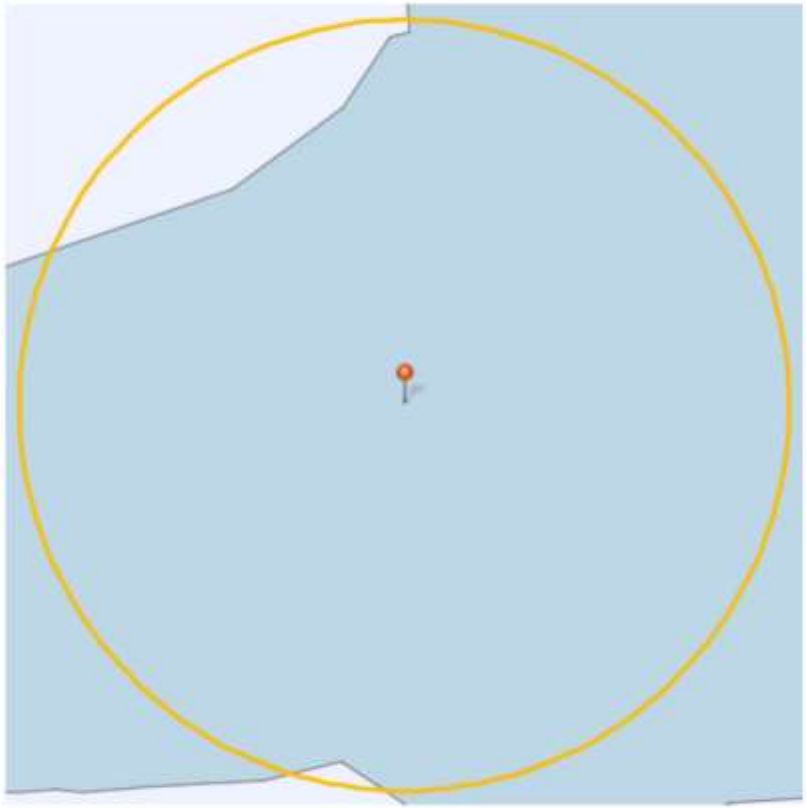
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

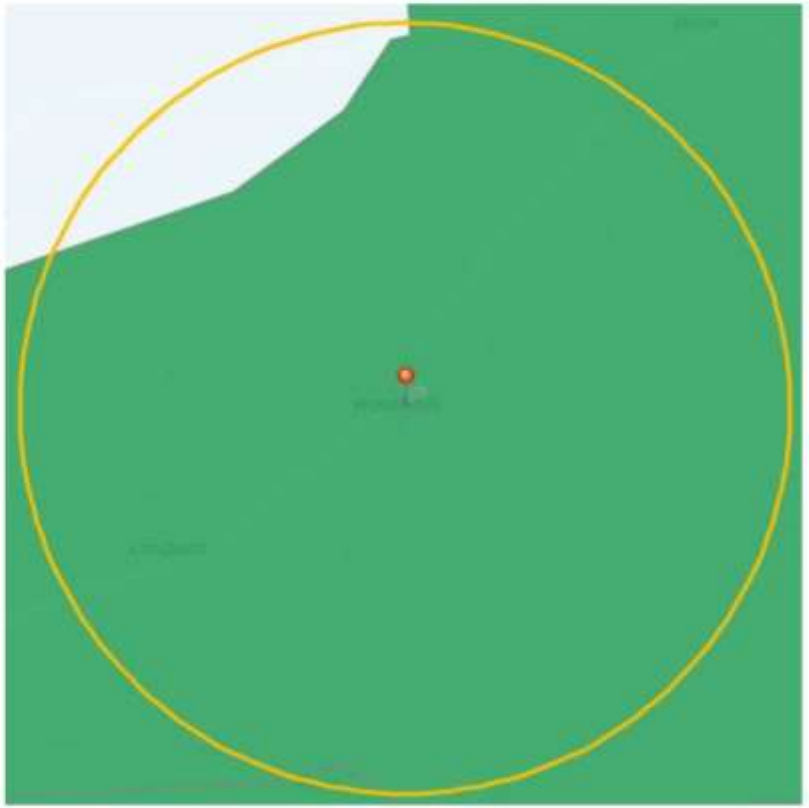
NZ Deprivation Index 2023 and alcohol ban area/s in Woodlands



259

Sum of NZ Crime Harm Index scores – Woodlands





260

Police recorded alcohol-related harm in Woodlands

Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Edendale-Woodlands	2	10	12	6	8	1	39
Grove Bush			2				2
Grand Total	**2**	**10**	**14**	**6**	**8**	**1**	**41**

261

Police recorded alcohol-related harm in Woodlands

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON			2				2
ACTS INTENDED TO CAUSE INJURY	1	3	3	2	3		12
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS					1		1
PUBLIC ORDER OFFENCES	1						1
SEXUAL ASSAULT AND RELATED OFFENCES				1			1
THEFT AND RELATED OFFENCES		1					1
TRAFFIC AND VEHICLE REGULATORY OFFENCES		4	2	1	3	1	11
UNKNOWN ANZSOC DIVISION		1	7	2	1		11
UNLAWFUL ENTRY WITH INTENT/BURGLARY, BREAK AND ENTER		1					1
Grand Total	**2**	**10**	**14**	**6**	**8**	**1**	**41**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1		1	1		3
Feb		1	1	1	1		4
Mar			1		5		6
Apr			2			1	3
May		5	2	1			8
Jun			1				1
Jul		2	5	1			8
Sep			1	2			3
Oct			1				1
Dec	2	1			1		4
Grand Total	**2**	**10**	**14**	**6**	**8**	**1**	**41**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon		1	4				5
Tue				2			2
Wed	1		1			1	3
Thu	1	1	1				3
Fri		1	1	1	2		5
Sat		1	1	2	6		10
Sun		6	6	1			13
Grand Total	**2**	**10**	**14**	**6**	**8**	**1**	**41**

262

Police recorded alcohol-related harm in Woodlands

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am			3		1		4
2am-2.59am		1		1	1		3
3am-3.59am		1	1	1			3
4am-4.59am		1					1
5am-5.59am		5	1		2		8
7am-7.59am			2				2
12pm-12.59pm			1			1	2
2pm-2.59pm	1						1
4pm-4.59pm		1	1				2
6pm-6.59pm	1		2				3
7pm-7.59pm				2			2
8pm-8.59pm			1	1	1		3
9pm-9.59pm			2	1			3
10pm-10.59pm		1					1
11pm-11.59pm					3		3
Grand Total	**2**	**10**	**14**	**6**	**8**	**1**	**41**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1		3		2			5
3			1		4		5
4			2				2
5	2	7	10	3	4	1	27
6				1			1
8			1				1
Grand Total	**2**	**10**	**14**	**6**	**8**	**1**	**41**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial		1					1
In Transit			1				1
Not Applicable		1					1
Online			2				2
Public Space	1	4	2	1	4	1	13
Residential	1	4	9	5	4		23
Grand Total	**2**	**10**	**14**	**6**	**8**	**1**	**41**

263

Police recorded alcohol-related harm in outdoor public places, in Woodlands

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1					1
Feb		1					1
Mar			1		3		4
Apr						1	1
Jul		2	1	1			4
Dec	1				1		2
Grand Total	**1**	**4**	**2**	**1**	**4**	**1**	**13**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Wed	1					1	2
Thu		1					1
Fri		1	1				2
Sat		1	1	1	4		7
Sun		1					1
Grand Total	**1**	**4**	**2**	**1**	**4**	**1**	**13**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS					1		1
PUBLIC ORDER OFFENCES	1						1
TRAFFIC AND VEHICLE REGULATORY OFFENCES		4	2	1	3	1	11
Grand Total	**1**	**4**	**2**	**1**	**4**	**1**	**13**

264

Police recorded alcohol-related harm in outdoor public places, in Woodlands

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
2am-2.59am		1			1		2
4am-4.59am		1					1
5am-5.59am			1				1
12pm-12.59pm						1	1
2pm-2.49pm	1						1
4pm-4.59pm		1					1
6pm-6.59pm			1				1
8pm-8.59pm				1			1
10pm-10.59pm		1					1
11pm-11.59pm					3		3
Grand Total	**1**	**4**	**2**	**1**	**4**	**1**	**13**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
1		2		1			3
5	1	2	2		4	1	10
Grand Total	**1**	**4**	**2**	**1**	**4**	**1**	**13**

265

Drink driving in Woodlands

Division	2021	2022	2023	2024	Grand Total
TRAFFIC AND VEHICLE REGULATORY OFFENCES	4	2	1	2	9
Grand Total	**4**	**2**	**1**	**2**	**9**

Month	2021	2022	2023	2024	Grand Total
Jan	1				1
Feb	1				1
Mar		1		1	2
Jul	2	1	1		4
Dec				1	1
Grand Total	**4**	**2**	**1**	**2**	**9**

Day	2021	2022	2023	2024	Grand Total
Thu	1				1
Fri	1	1			2
Sat	1	1	1	2	5
Sun	1				1
Grand Total	**4**	**2**	**1**	**2**	**9**

Start time	2021	2022	2023	2024	Grand Total
2am-2.59am	1			1	2
4am-4.59am	1				1
5am-5.59am		1			1
4pm-4.59pm	1				1
6pm-6.59pm		1			1
8pm-8.59pm			1		1
10pm-10.59pm	1				1
11pm-11.59pm				1	1
Grand Total	**4**	**2**	**1**	**2**	**9**

NZ Deprivation Index 2023	2021	2022	2023	2024	Grand Total
1	2		1		3
5	2	2		2	6
Grand Total	**4**	**2**	**1**	**2**	**9**

266

Police recorded alcohol-related family harm, in Woodlands

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Edendale-Woodlands	1	5	7	4	1	18
Grove Bush			2			2
Grand Total	**1**	**5**	**9**	**4**	**1**	**20**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
ACTS INTENDED TO CAUSE INJURY	1	3	3	2		9
SEXUAL ASSAULT AND RELATED OFFENCES				1		1
THEFT AND RELATED OFFENCES		1				1
UNKNOWN ANZSOC DIVISION		1	6	1	1	9
Grand Total	**1**	**5**	**9**	**4**	**1**	**20**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Jan				1		1
Feb			1	1	1	3
Apr			2			2
May		5	2	1		8
Jul			3			3
Sep			1	1		2
Dec	1					1
Grand Total	**1**	**5**	**9**	**4**	**1**	**20**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
1				1		1
3					1	1
4			2			2
5	1	5	7	3		16
Grand Total	**1**	**5**	**9**	**4**	**1**	**20**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
Mon			3			3
Tue				1		1
Wed			1			1
Thu	1					1
Fri				1		1
Sat				1	1	2
Sun		5	5	1		11
Grand Total	**1**	**5**	**9**	**4**	**1**	**20**

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
12am-12.59am			3		1	4
2am-2.59am				1		1
3am-3.59am			1	1		2
5am-5.59am		5				5
7am-7.59am			2			2
4pm-4.59pm			1			1
6pm-6.59pm	1					1
7pm-7.59pm				1		1
9pm-9.59pm			2	1		3
Grand Total	**1**	**5**	**9**	**4**	**1**	**20**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	Grand Total
In Transit			1			1
Not Applicable		1				1
Residential	1	4	8	4	1	18
Grand Total	**1**	**5**	**9**	**4**	**1**	**20**

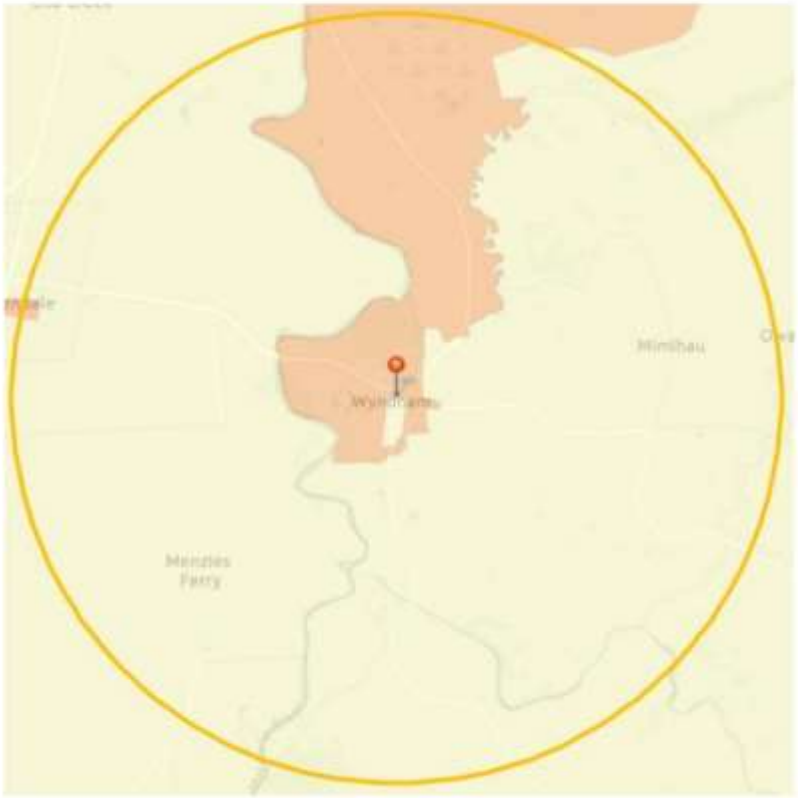
267

Wyndham

Within 5km of the intersection of Balaclava and Redan Streets

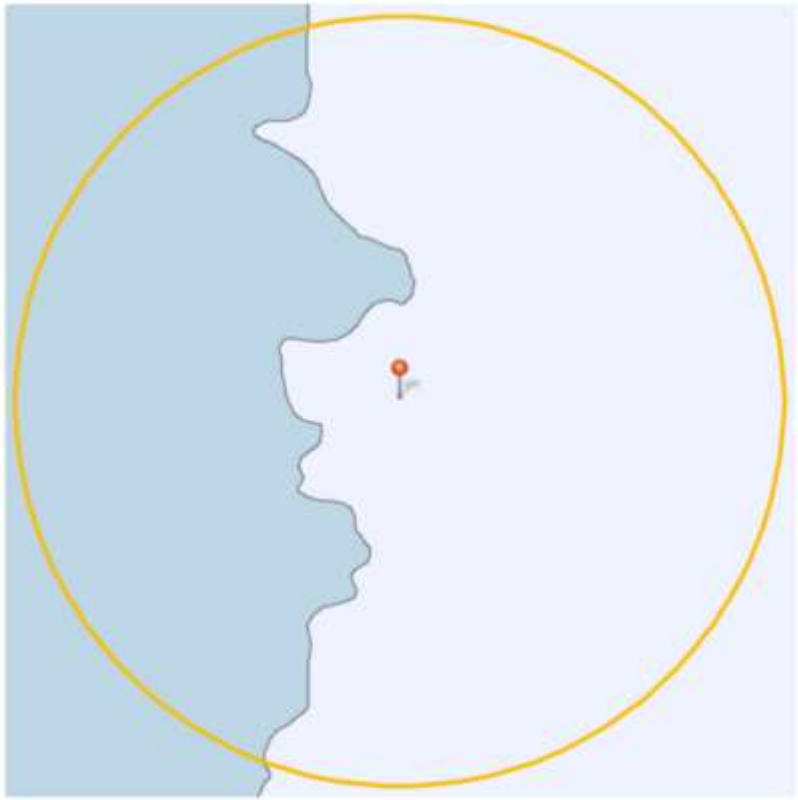
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

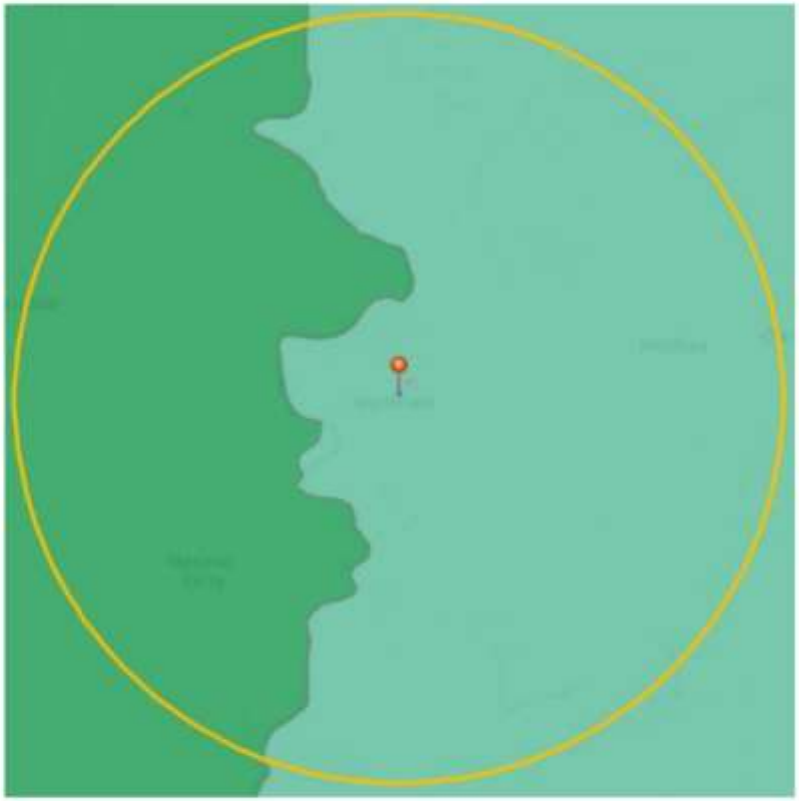
NZ Deprivation Index 2023 and alcohol ban area/s in Wyndham



269

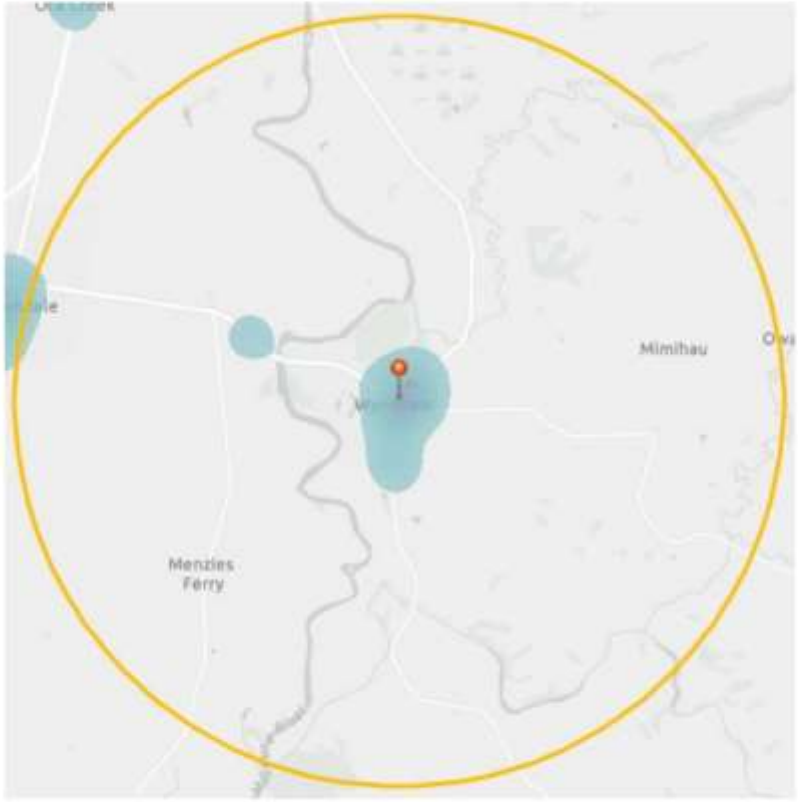
Sum of NZ Crime Harm Index scores – Wyndham





270

Police recorded alcohol-related harm in Wyndham



Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

Harm where the scene type is residential is included in the following tables. In lieu of including it in the map, it has been included in a table by statisticial area 2.

Note: harm is not always linked to a specific address. When it has been linked to a less specific location, e.g. Main Street rather than 123 Main Street, it will not appear on maps exactly where it occurred.

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Wyndham-Catlins	18	16	10	9	20	7	80
Edendale-Woodlands	3	5	4				12
Grand Total	**21**	**21**	**14**	**9**	**20**	**7**	**92**

271

Police recorded alcohol-related harm in Wyndham

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON	1	2			1		4
ACTS INTENDED TO CAUSE INJURY	7	2	3		2		14
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		1			1		2
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		1	1				2
PROHIBITED AND REGULATED WEAPONS AND EXPLOSIVES OFFENCES	1						1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION	1	1		1	1		4
PUBLIC ORDER OFFENCES	1	1	1	1	3		7
SEXUAL ASSAULT AND RELATED OFFENCES	2	1			1		4
THEFT AND RELATED OFFENCES	1						1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	3	6	1	2	5	3	20
UNKNOWN ANZSOC DIVISION	4	6	8	5	6	4	33
Grand Total	**21**	**21**	**14**	**9**	**20**	**7**	**92**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1	3		2	1	7
Feb		1	2			3	6
Mar			1		1	1	3
Apr		1	1		2	2	6
May		4		1	1		6
Jun		1	3	1	4		9
Jul	2	2		4			8
Aug	9	5	1		7		22
Oct		1	1		1		3
Nov	1	3	2	3	2		11
Dec	9	2					11
Grand Total	**21**	**21**	**14**	**9**	**20**	**7**	**92**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1		3		1		5
Tue	2	1					3
Wed	2	3	1	1	1	1	9
Thu	2	1	2				5
Fri	7	4	2	1	7	3	24
Sat	7	5	4	2	6	3	27
Sun		7	2	5	5		19
Grand Total	**21**	**21**	**14**	**9**	**20**	**7**	**92**

272

Police recorded alcohol-related harm in Wyndham

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	5		1		3		9
1am-1.59am		2			3		5
2am-2.59am	2		1	3			6
3am-3.59am			1				1
4am-4.59am				1			1
10am-10.59am	1	1					2
11am-11.59am				1	1		2
12pm-12.59pm			2				2
1pm-1.59pm	1				3		4
2pm-2.59pm					3		3
3pm-3.59pm	2						2
4pm-4.59pm	1				1	1	3
5pm-5.59pm			1			1	2
6pm-6.59pm		5			1		6
7pm-7.59pm	1	3	1	1		1	7
8pm-8.59pm		4	1				5
9pm-9.59pm	1	1	3	1	3	1	10
10pm-10.59pm	1	3	1	2	1	3	11
11pm-11.59pm	6	2	2		1		11
Grand Total	**21**	**21**	**14**	**9**	**20**	**7**	**92**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5	3	5	2			1	11
6	6	3	1	5	10	1	26
7	10	11	9	4	9	4	47
8	2	2	2		1	1	8
Grand Total	**21**	**21**	**14**	**9**	**20**	**7**	**92**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Commercial	7			1	1		9
Community					2		2
In Transit			1		2		3
Not Applicable				1			1
Online			1		1		2
Public Space	5	12	3	3	6	4	33
Residential	8	9	8	4	8	3	40
Retail	1		1				2
Grand Total	**21**	**21**	**14**	**9**	**20**	**7**	**92**

273

Police recorded alcohol-related harm in outdoor public places, in Wyndham

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan					1		1
Feb			1			1	2
Mar			1		1	1	3
Apr						2	2
May		2					2
Jun					2		2
Jul		1		1			2
Aug	1	5			1		7
Oct		1	1				2
Nov	1	1		2	1		5
Dec	3	2					5
Grand Total	**5**	**12**	**3**	**3**	**6**	**4**	**33**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon	1		1				2
Tue		1					1
Wed		1					1
Thu	1						1
Fri	1	3	1		2	2	9
Sat	2	2		2	1	2	9
Sun		5	1	1	3		10
Grand Total	**5**	**12**	**3**	**3**	**6**	**4**	**33**

274

Police recorded alcohol-related harm in outdoor public places, in Wyndham

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ACTS INTENDED TO CAUSE INJURY	2	1					3
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS		1					1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION		1			1		2
PUBLIC ORDER OFFENCES		1	1		1		3
TRAFFIC AND VEHICLE REGULATORY OFFENCES	3	6	1	2	4	3	19
UNKNOWN ANZSOC DIVISION		2	1	1		1	5
Grand Total	**5**	**12**	**3**	**3**	**6**	**4**	**33**

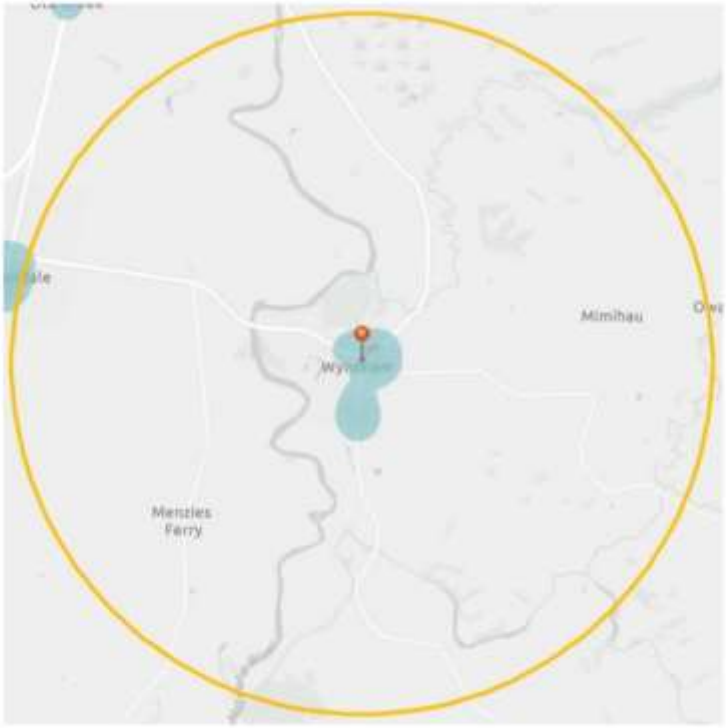
Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	2				2		4
1am-1.59am		2			1		3
2am-2.59am			1				1
3am-3.59am			1				1
4am-4.59am				1			1
11am-11.59am					1		1
1pm-1.59pm	1						1
5pm-5.59pm			1			1	2
6pm-6.59pm		4					4
7pm-7.59pm	1	2		1		1	5
8pm-8.59pm		2					2
9pm-9.59pm	1	1		1	2	1	6
10pm-10.59pm		1				1	2
Grand Total	**5**	**12**	**3**	**3**	**6**	**4**	**33**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5	1	5				1	7
6				1	2		3
7	4	6	3	2	3	3	21
8		1			1		2
Grand Total	**5**	**12**	**3**	**3**	**6**	**4**	**33**

275

Drink driving in Wyndham

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS			1				1
TRAFFIC AND VEHICLE REGULATORY OFFENCES	2	6	1	2	5	3	19
Grand Total	**2**	**6**	**2**	**2**	**5**	**3**	**20**



Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan					1		1
Feb			1			1	2
Mar					1	1	2
Apr						1	1
May		1					1
Jul				1			1
Aug		2			1		3
Oct		1					1
Nov		1	1	1	2		5
Dec	2	1					3
Grand Total	**2**	**6**	**2**	**2**	**5**	**3**	**20**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Tue		1					1
Wed		1					1
Thu	1						1
Fri		1	1		2	2	6
Sat	1	1	1	2	2	1	8
Sun		2			1		3
Grand Total	**2**	**6**	**2**	**2**	**5**	**3**	**20**

276

Drink driving in Wyndham

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am	1						1
1am-1.59am		1			1		2
2am-2.59am			1				1
11am-11.59am					1		1
1pm-1.59pm	1						1
5pm-5.59pm						1	1
6pm-6.59pm		2					2
7pm-7.59pm		1		1		1	3
8pm-8.59pm		1					1
9pm-9.59pm		1	1	1	3	1	7
Grand Total	**2**	**6**	**2**	**2**	**5**	**3**	**20**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5		2				1	3
7	2	4	2	2	4	2	16
8					1		1
Grand Total	**2**	**6**	**2**	**2**	**5**	**3**	**20**

277

Police recorded alcohol-related family harm, in Wyndham

Statistical Area 2	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Wyndham-Catlins	4	4	4	6	9	2	29
Edendale-Woodlands		2	4				6
Grand Total	**4**	**6**	**8**	**6**	**9**	**2**	**35**

Division	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
ABDUCTION, HARASSMENT AND OTHER RELATED OFFENCES AGAINST A PERSON					1		1
ACTS INTENDED TO CAUSE INJURY	2	1	3		2		8
DANGEROUS OR NEGLIGENT ACTS ENDANGERING PERSONS					1		1
OFFENCES AGAINST JUSTICE PROCEDURES, GOVT SEC AND GOVT OPS		1					1
PROPERTY DAMAGE AND ENVIRONMENTAL POLLUTION				1			1
PUBLIC ORDER OFFENCES					1		1
UNKNOWN ANZSOC DIVISION	2	4	5	5	4	2	22
Grand Total	**4**	**6**	**8**	**6**	**9**	**2**	**35**

Month	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Jan		1	2			1	4
Feb		1	1			1	3
Apr		1	1		2		4
May				1			1
Jun			2				2
Jul		1		3			4
Aug	1		1		6		8
Oct					1		1
Nov	1	2	1	2			6
Dec	2						2
Grand Total	**4**	**6**	**8**	**6**	**9**	**2**	**35**

Day	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Mon			2				2
Wed			1	1		1	3
Thu	1	1	1				3
Fri	1	1	1	1	5		9
Sat	2	2	2		3	1	10
Sun		2	1	4	1		8
Grand Total	**4**	**6**	**8**	**6**	**9**	**2**	**35**

278

Police recorded alcohol-related family harm, in Wyndham

Start time	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
12am-12.59am			1				1
1am-1.59am					2		2
2am-2.59am	2			3			5
4am-4.59am				1			1
10am-10.59am	1	1					2
11am-11.59am				1			1
12pm-12.59pm			2				2
1pm-1.59pm					3		3
2pm-2.49pm					3		3
6pm-6.59pm		1			1		2
7pm-7.59pm			1				1
8pm-8.59pm			1				1
9pm-9.59pm	1		1				2
10pm-10.59pm		2	1	1		2	6
11pm-11.59pm		2	1				3
Grand Total	**4**	**6**	**8**	**6**	**9**	**2**	**35**

NZ Deprivation Index 2023	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
5			2				2
6		2	1	4	6	1	14
7	3	3	3	2	3	1	15
8	1	1	2				4
Grand Total	**4**	**6**	**8**	**6**	**9**	**2**	**35**

Scene type	2020 (Jul-Dec)	2021	2022	2023	2024	2025 (Jan-May)	Grand Total
Community					2		2
Not Applicable				1			1
Online			1		1		2
Public Space	1			1			2
Residential	3	6	7	4	6	2	28
Grand Total	**4**	**6**	**8**	**6**	**9**	**2**	**35**

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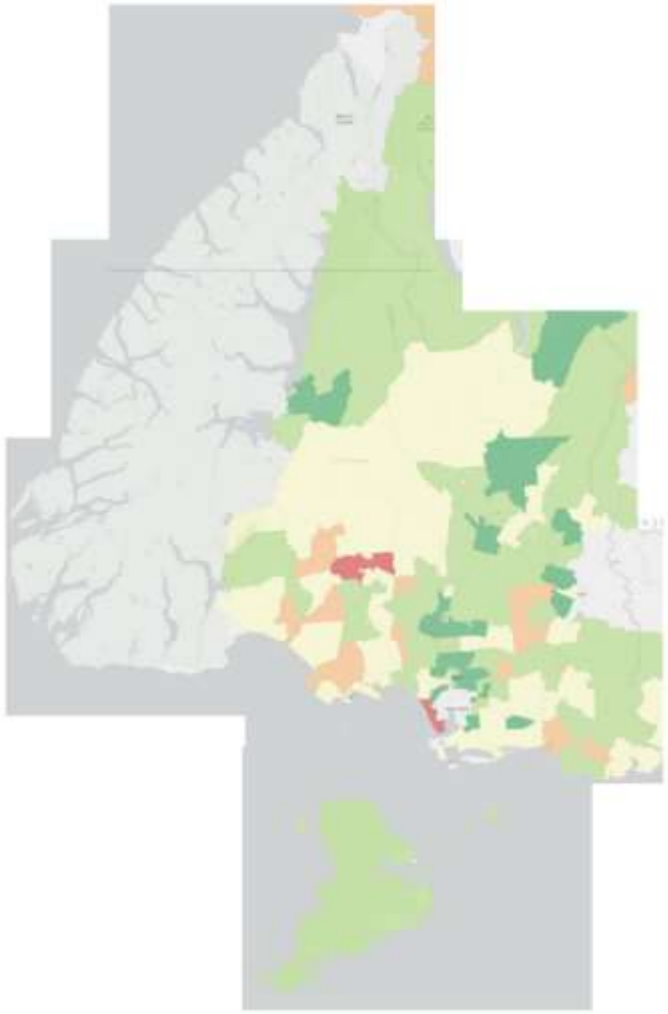
Southland District Council

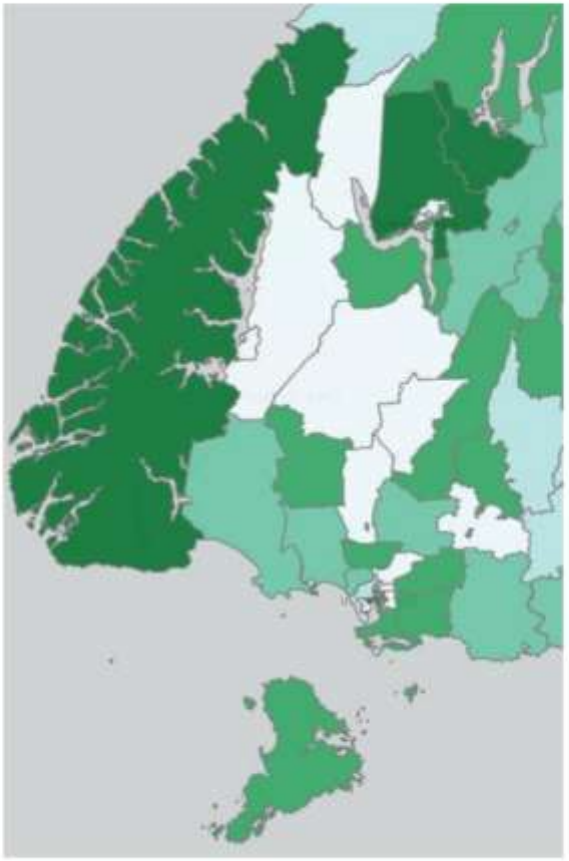
NEW ZEALAND POLICE
Ngā Pirihimana o Aotearoa

NZ Deprivation Index 2023



281

Sum of NZ Crime Harm Index (last 5 years)

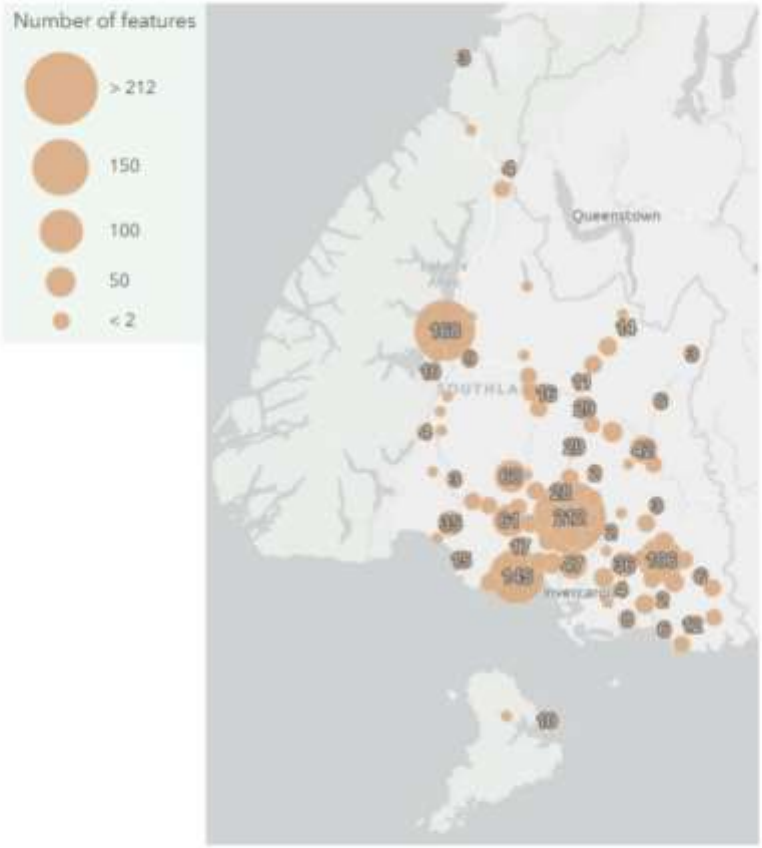


282

Police recorded alcohol harm

TOTAL	2390

Territorial Local Authority

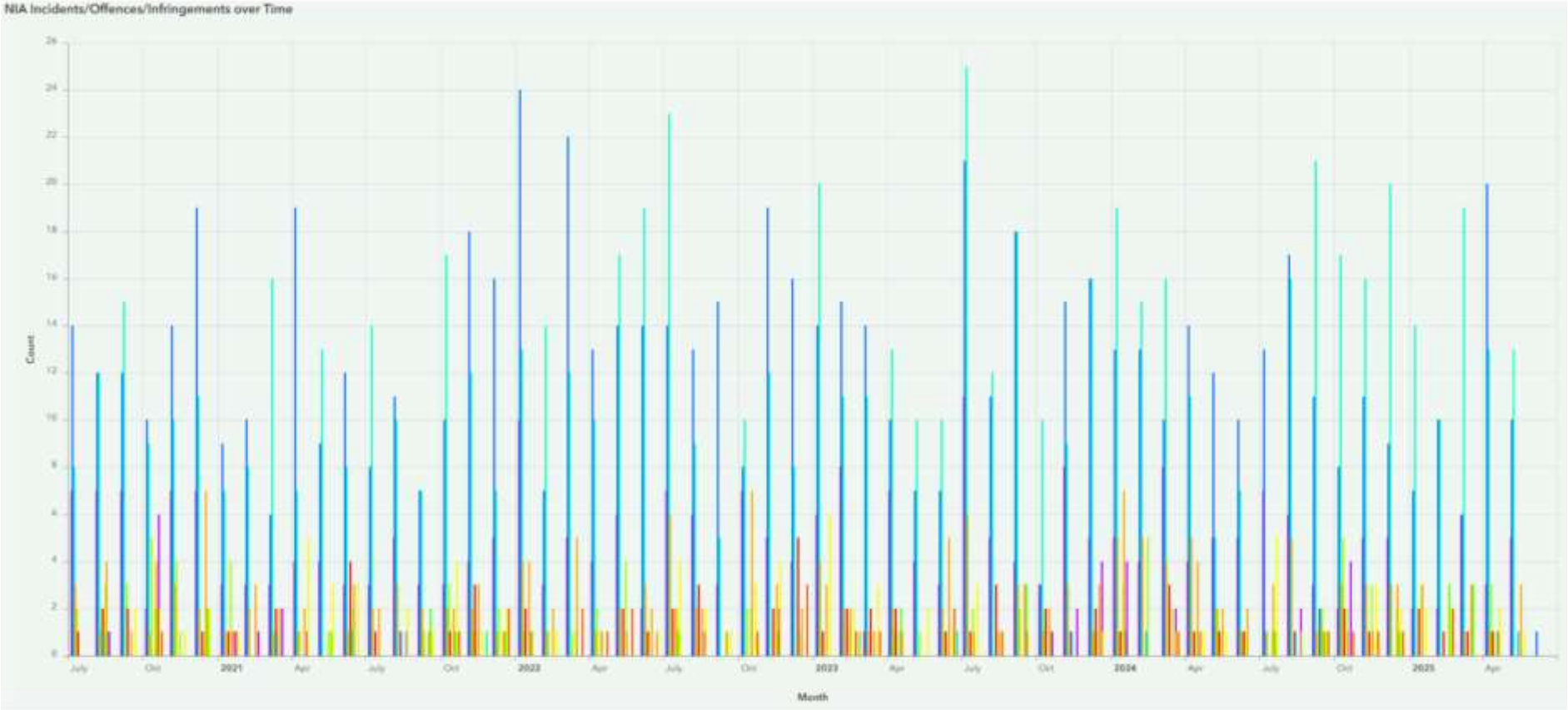


Harm where the scene type is residential has been excluded from this map in order to protect the privacy of those involved.

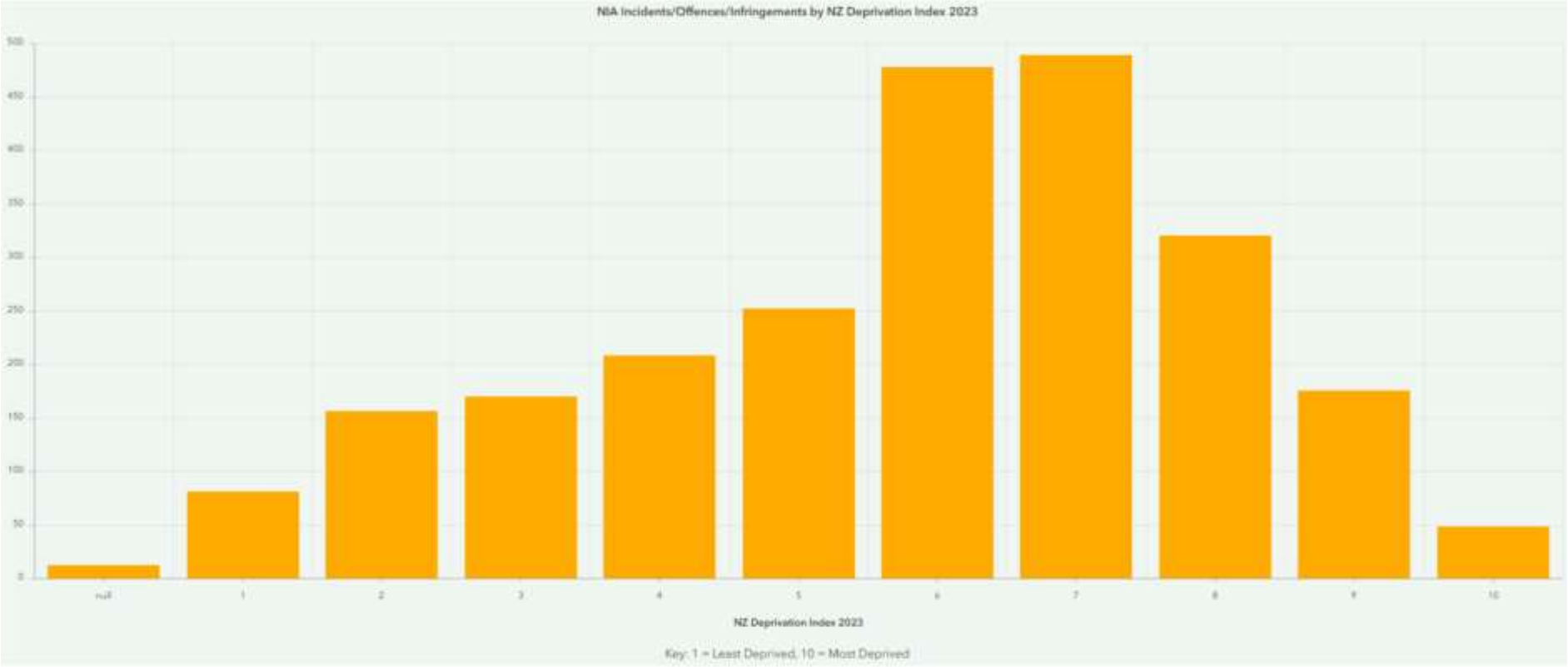
Harm where the scene type is residential is included in the total count above and in the following charts.

Legend for following slide

284


NIA Incidents/Offences/Infringements over Time
Count
Month
July
Oct
2021
Apr
July
Oct
2022
Apr
July
Oct
2023
Apr
July
Oct
2024
Apr
July
Oct
2025
Apr

285


NIA Incidents/Offences/Infringements by NZ Deprivation Index 2023
500
450
400
350
300
250
200
150
100
50
0
null
1
2
3
4
5
6
7
8
9
10
NZ Deprivation Index 2023
Key: 1 = Least Deprived, 10 = Most Deprived

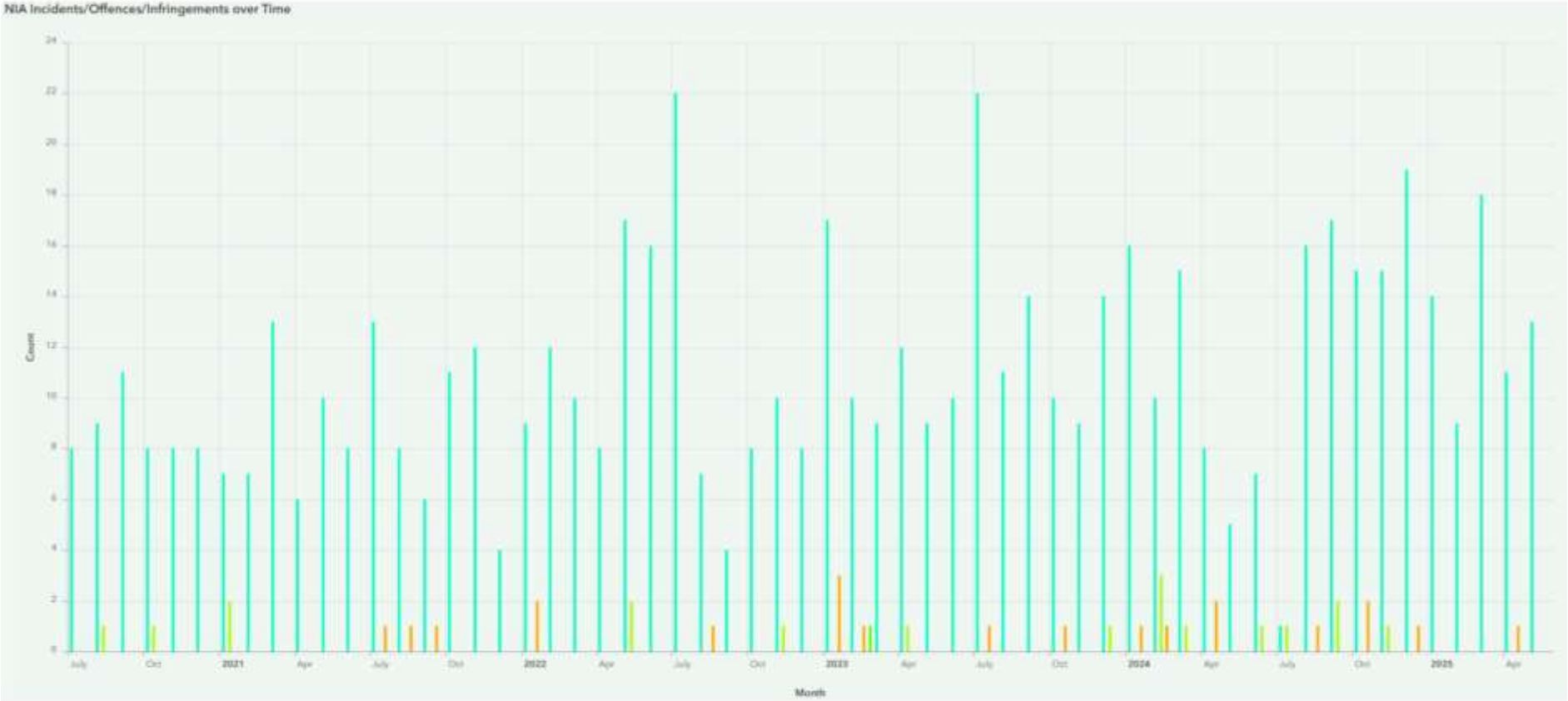
286

Legend for following slide

287

Drink driving related offences

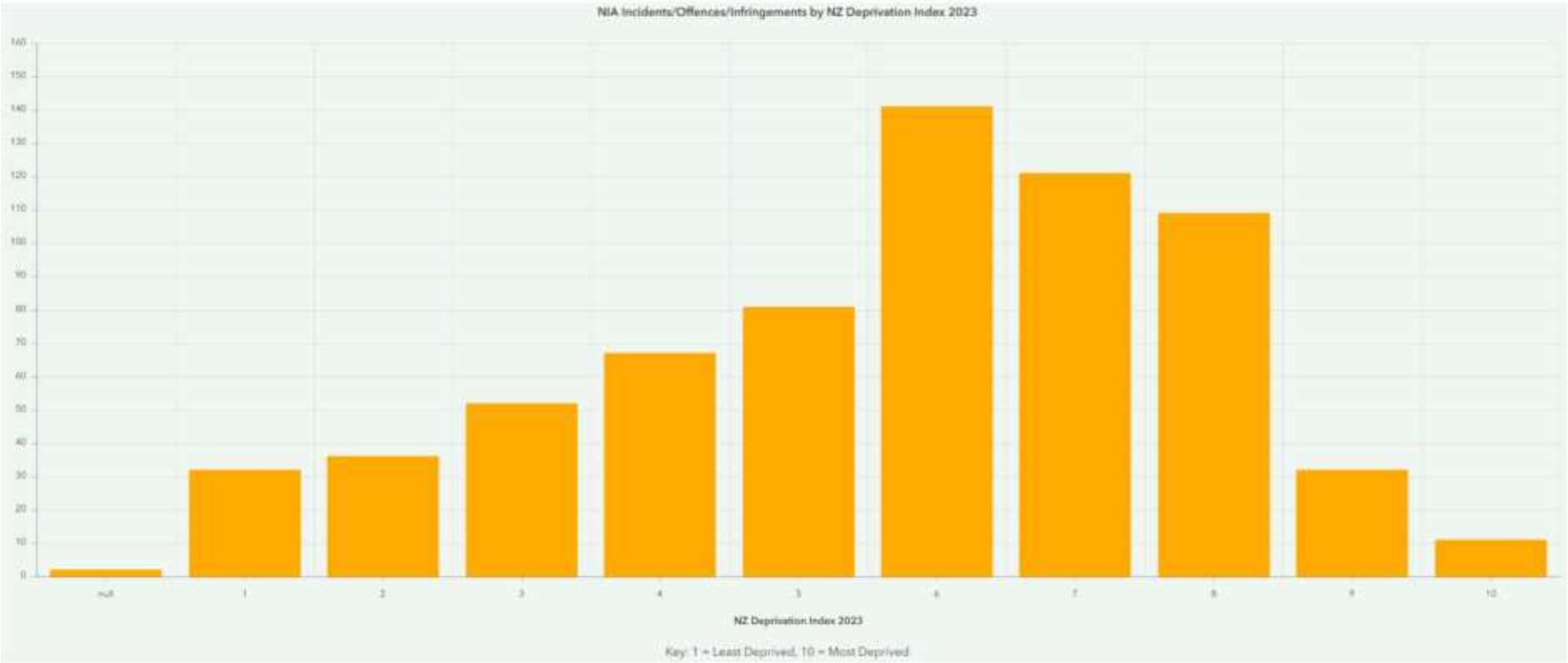
TOTAL	684



NB: these figures are counted differently than how publicly reported figures are and cannot be compared to those

288

Drink driving related offences



NB: these figures are counted differently than how publicly reported figures are and cannot be compared to those

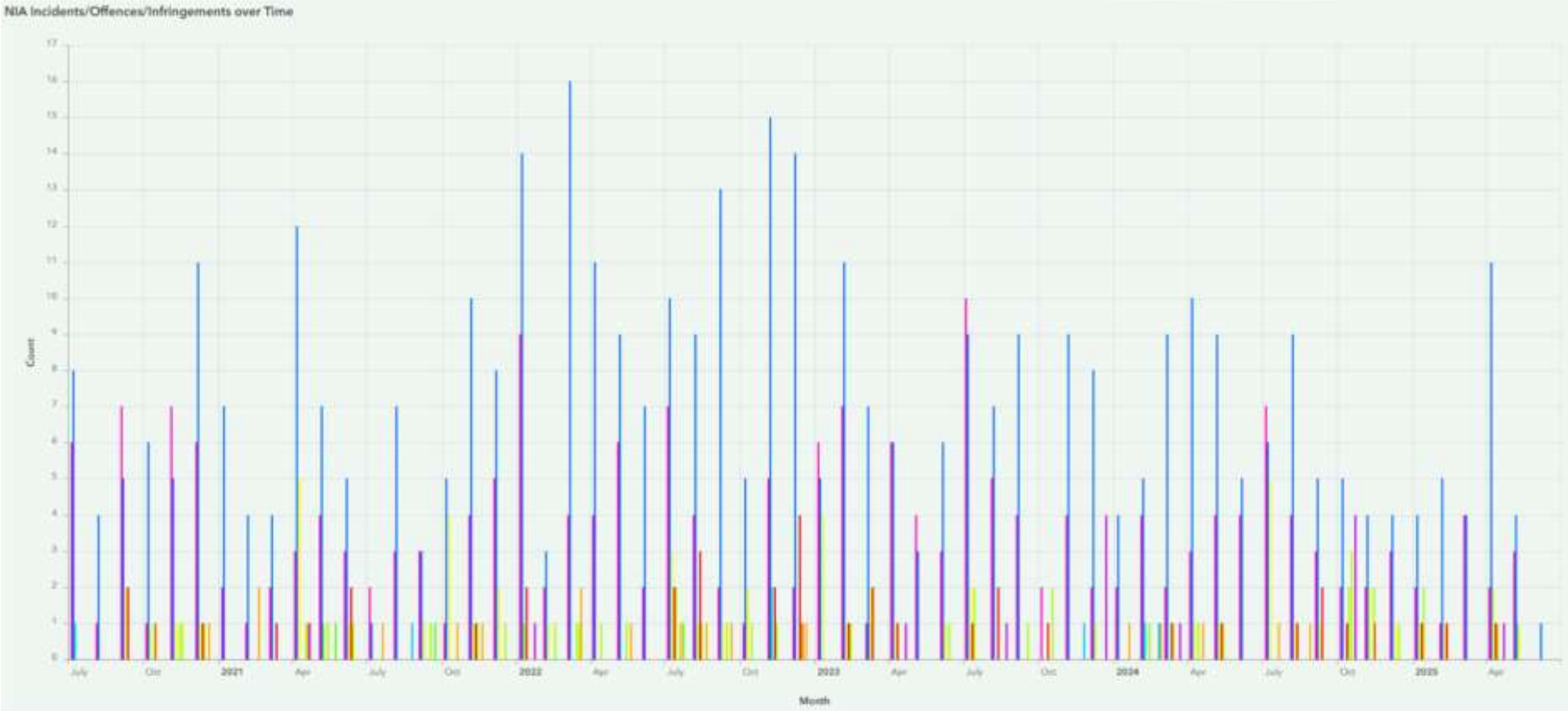
289

Legend for following slide

290

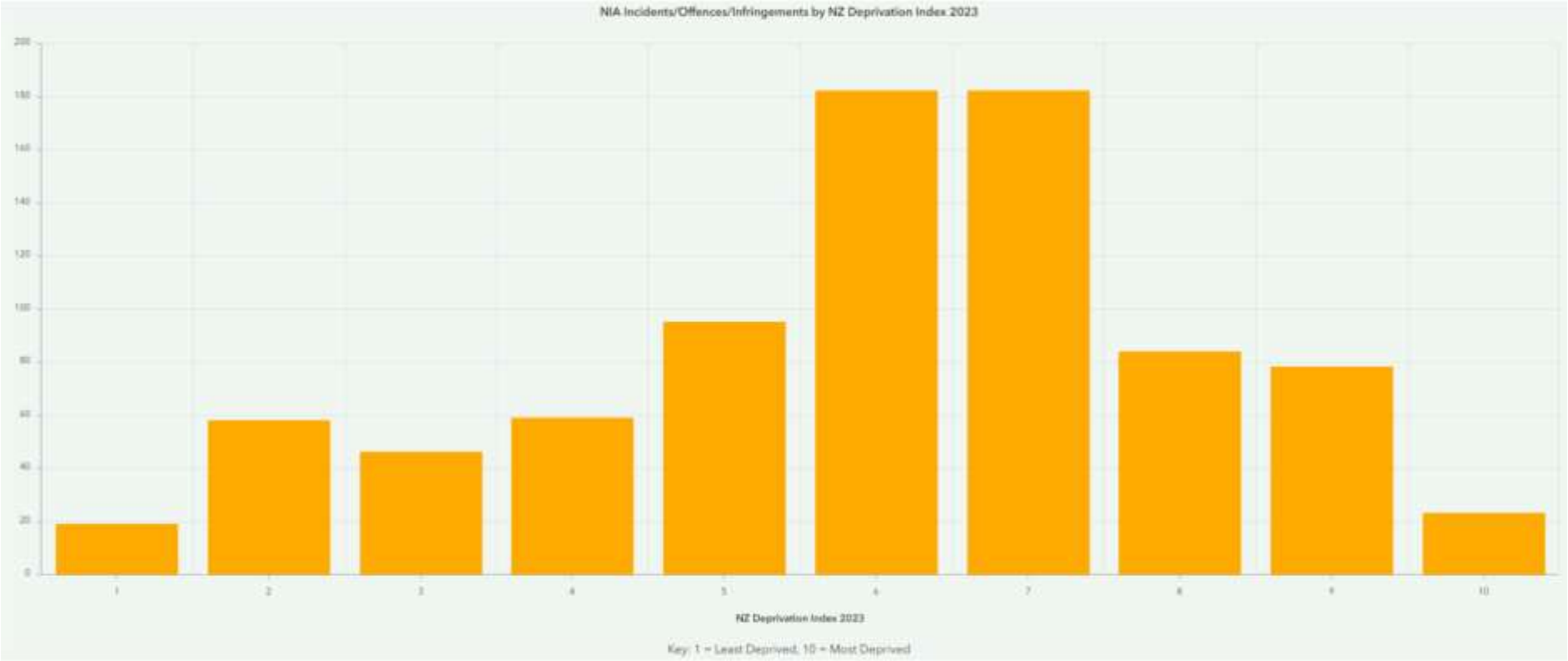
Alcohol-related family harm

TOTAL	826



291

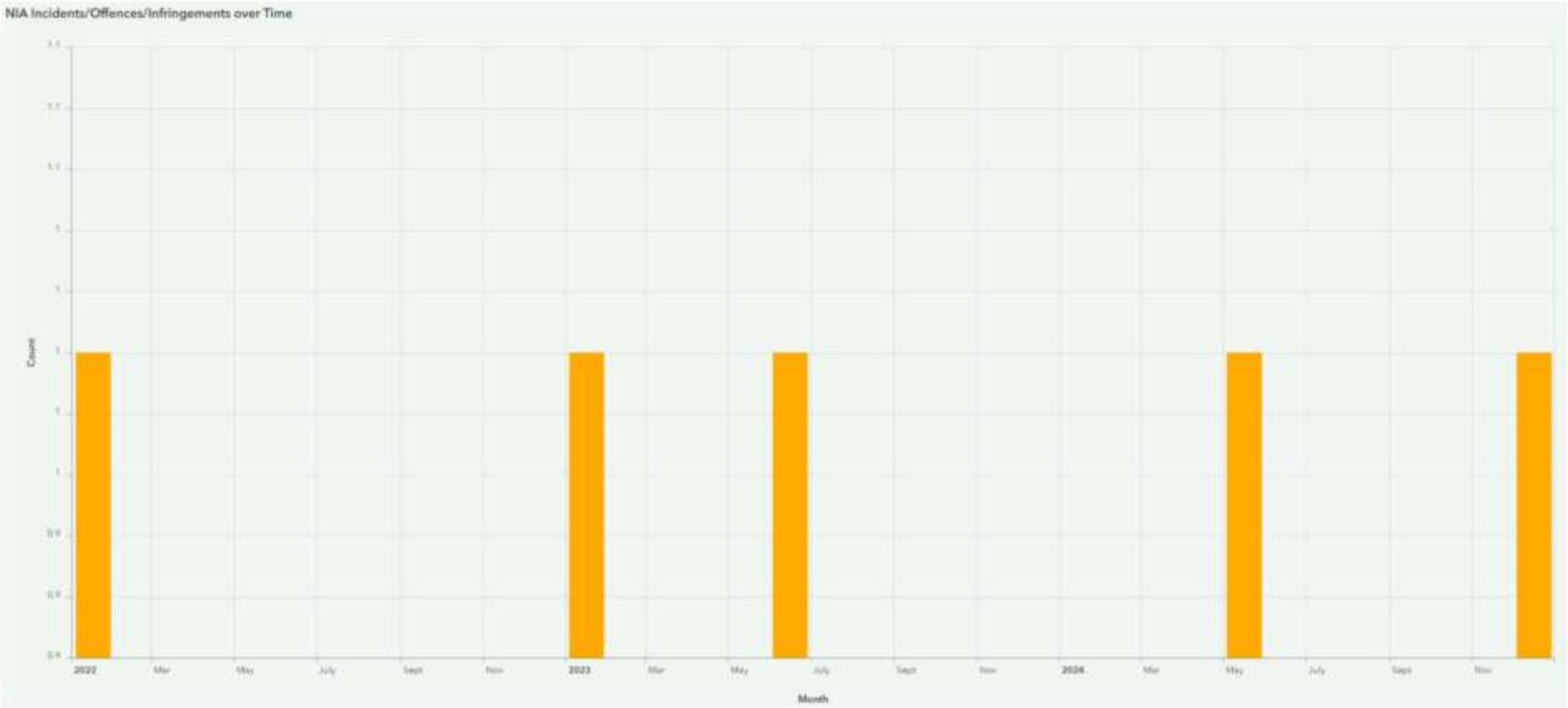
Alcohol-related family harm



292

Alcohol ban breaches

TOTAL	5



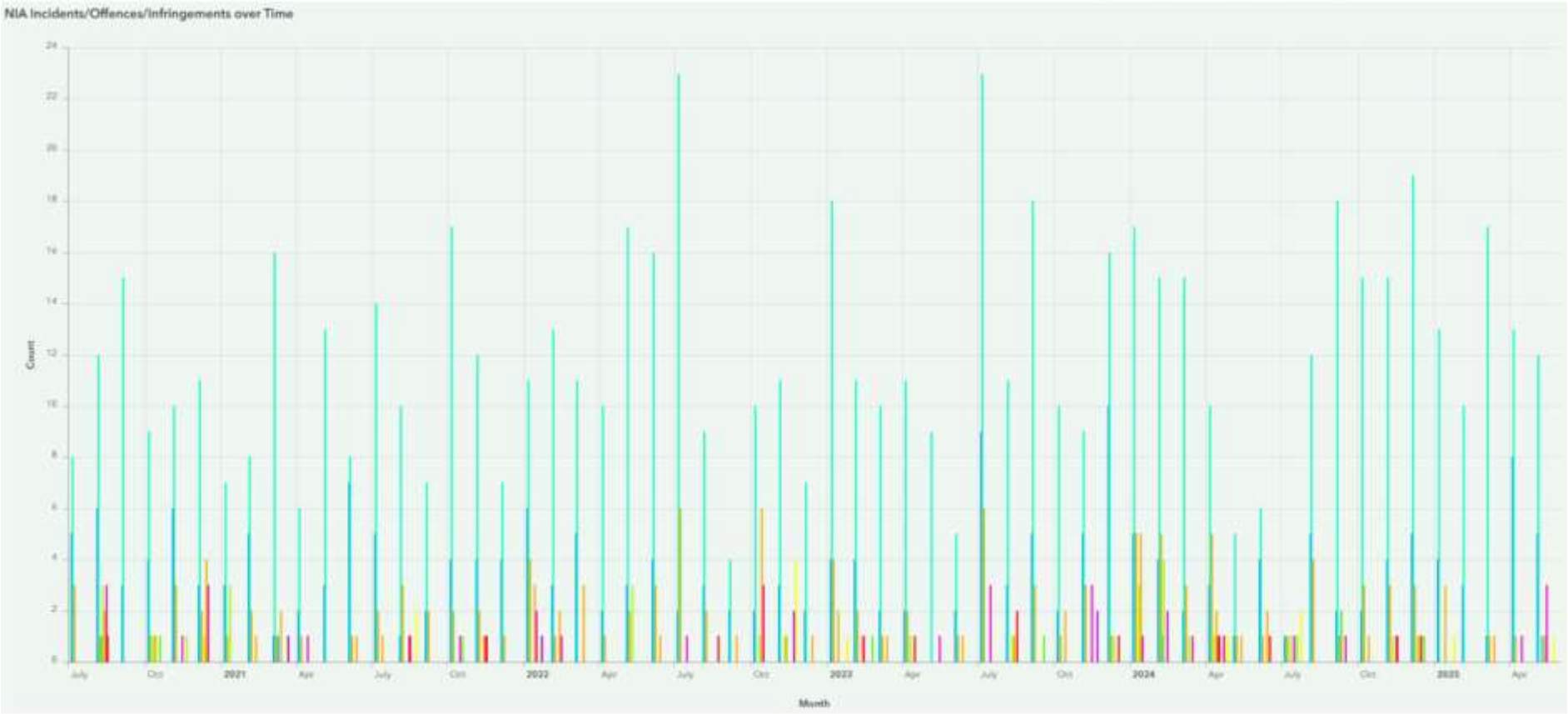
293

Legend for following slide

294

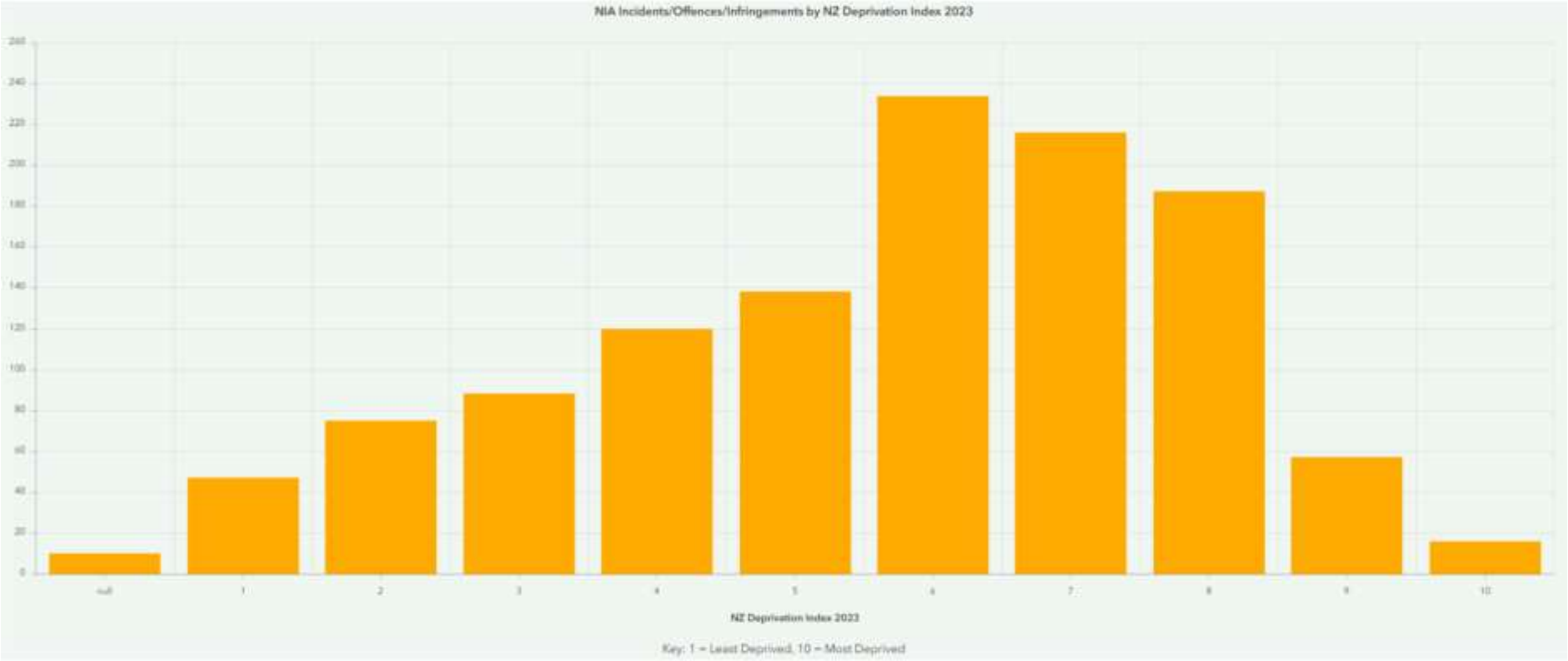
Alcohol-related harm in outdoor public places

TOTAL	1188



295

Alcohol-related harm in outdoor public places



296

Ana Bremer

From: Wendy Findlay
Sent: Friday, 27 June 2025 2:24 pm
To: Policy@icc.govt.nz
Cc: Ana Bremer
Subject: feedback on the LAP

Follow Up Flag: Follow up
Flag Status: Flagged

This message is from an external sender

Kia ora Hannah and Ana

Vanessa our CE has asked me to provide feedback on the Southland/Invercargill Combined Local Alcohol Plan on behalf of Healthy Families Invercargill. Thank you for the opportunity to provide input at this early stage of consultation. The feedback I would like to provide includes the following:

- A Southland wide LAP would provide consistency across the district so we would support any opportunity to encourage the Gore/Mataura district to be part of this LAP.
- We would support a reduction in timeframe for the Policy Review Period from the current 6 years to a maximum of 3 years. It is our opinion that a great deal can change in a 6 year time frame, particularly in relation to the use or harm from alcohol.
- We would support a reduction in trading hours, particularly the opening hours, moving this from an 8 am opening time until at least 9.00am.
- We would also like to see consideration of online sales and in particular the delivery of alcohol via mechanisms such as uber, door dash etc included in the LAP if possible.

Hopefully this feedback is useful, happy to provide clarification if necessary.

Ngā mihi
Wendy

Ana Bremer

From: Ana Bremer
Sent: Monday, 11 August 2025 9:44 am
To: Ana Bremer
Subject: FW: COMBINED LAP REVIEW

Ana Bremer
Senior Policy Analyst
Southland District Council
PO Box 903
Invercargill 9840
P: 0800 732 732
www.southlanddc.govt.nz

From: MCNAUGHT, Hayden <Hayden.McNaught@police.govt.nz>
Sent: Wednesday, 2 July 2025 11:01 am
To:
Cc: BOWMAN, Michael (Mike) <Michael.Bowman@police.govt.nz>

Subject: COMBINED LAP REVIEW

Kia Ora. Over the last 4 years in this role, I have become very familiar with the ICC and SDC Combined Local Alcohol Policy. I have discussed this review with the appropriate Senior Managers of Police for Invercargill/Southland and I have been asked to forward this email on their behalf.

Local Alcohol Policies are exactly that. They will differ throughout the country as they are tailor made to suit each Territorial Authority. From a Southland Police perspective, the view is that the current ICC and SDC Combined policy is fit for purpose and Police feel there is no need to make any submissions to give consideration to any additions or changes to the Policy.

Police are aware that there will most likely be submissions from the respective Chief Licensing Inspector from ICC and SDC, and possibly from the respective Licensing Committee's as well.

With the knowledge and information available, Police would not dispute or discourage any topics being submitted by the other reporting agencies and therefore being given consideration by the Policy makers.

So the general Police stance on this review is status quo and we will not be making any formal submissions.

Regards, Hayden.

Hayden McNaught
Sergeant
Alcohol Harm Prevention Officer
Invercargill

P
M
E hayden.mcnaught@police.govt.nz

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Hospitality New Zealand

TO SOUTHLAND DISTRICT COUNCIL & INVERCARGILL CITY COUNCIL

SUBMISSION ON

PRE-REVIEW SOUTHLAND/INVERCARGILL COMBINED LOCAL ALCOHOL POLICY

JULY 2025

CONTACT: **Hospitality New Zealand**
Brendan Elliott
Regional Manager, Lower South Island
Phone: 0800 500 503
Email: brendan.elliott@hospitality.org.nz
www.hospitality.org.nz

About Hospitality New Zealand:

1. Hospitality New Zealand ("Hospitality NZ") is a member-led, not-for-profit organisation representing around 2,500 businesses, including cafés, restaurants, bars, nightclubs, commercial accommodation, country hotels and off-licences. Our vision is to see hospitality recognised and celebrated for its contribution to Aotearoa, attracting fresh talent and generating sustainable returns for businesses and communities.

2. Hospitality NZ has advocated on behalf of the hospitality and tourism sector for over 123 years. We support and improve the hospitality industry in Aotearoa New Zealand through advocacy, training, connection, and support. We want to create a vibrant, sustainable and thriving hospitality sector that benefits businesses, employees, economies and communities. We aim to empower hospitality businesses with the knowledge, resources, and partnerships they need to succeed and contribute positively to their communities.

3. As the trusted body, we seek to unlock the industry's full potential as a significant engine for growth in the New Zealand economy and to ensure that the industry's needs are represented by engaging with the Government and wider industry.

4. This submission relates to the early engagement review of the Southland/Invercargill Combined Local Alcohol Policy (LAP).

5. Enquiries relating to this submission should be referred to Brendan Elliott, brendan.elliott@hospitality.org.nz.

General Comments:

6. Hospitality New Zealand welcomes the opportunity to engage early on the review of the Southland/Invercargill Combined Local Alcohol Policy.

7. We appreciate that there is an increasing desire from local government to minimise alcohol harm and this is a laudable goal. Currently the default option for many councils is to look to implement or amend LAPs, which is often a time consuming, expensive and sometimes frustrating process.

8. We believe councils have many options available to address alcohol harm while maintaining the community and economic benefit of hospitality. Some of these tools include:
    - National settings under the Sale and Supply of Alcohol Act.
    - District Licensing Committees and their discretion around approving licenses, and the ability to issue infringement notices and license suspensions for noncompliance.
    - Accords and stakeholder agreements to drive inner city safety improvements; eg Poneke Promise in Wellington, Cromwell Alcohol Accord, Octagon Alcohol Accord in Dunedin.
    - Host responsibility and Sexual Harm Prevention training: eg Responsible Service of Alcohol (HNZ), Servewise (HPA), Don't Guess the Yes (RespectED).
    - Inner city safety initiatives including design, lighting, cameras and safe zones for vulnerable people: eg Take 10.

9. We recognise that some feel hospitality contributes to alcohol-related harm in some communities. However, we firmly believe that well run on-licenced environments are part of the solution to addressing alcohol related harm in New Zealand.

10. We would also note that many hold the view that access equals more consumption (and potentially harm). However, prior to the implementation of the Sale of Liquor Act in 1989 there were about 3000 licenses in NZ and since then the number of licenses has increased to just over 11,000. Conversely, liquor consumption in New Zealand has decreased 23% since 1986. Therefore, increased access (more licenses and more places to purchase alcohol) has not translated into higher consumption.

Specific Comments:

Trading Hours

11. Hospitality NZ recommends the current status quo for trading hours in relation to on-licences.

12. Hospitality NZ believes well-run licensed venues play a key role in supporting safe and responsible consumption of alcohol. By reducing on-premise hours, there would be a risk that would push consumption of alcohol to unlicensed environments, potentially working against the Council's aims of reducing alcohol-related harm.

Discretionary Conditions

13. Hospitality NZ acknowledges the role that discretionary conditions can play in achieving the purpose of the Sale and Supply of Alcohol Act 2012, particularly in managing higher-risk situations and addressing premises-specific issues. However, experience in Auckland and other centres has shown that when multiple discretionary conditions are applied by default (rather than in response to specific, evidenced concerns), they create disproportionate burden on responsible operators without demonstrable reductions in alcohol-related harm.

Training Requirements- Host Responsibility

14. Hospitality NZ fully endorses Host Responsibility training as a vital part of ensuring safe and responsible service of alcohol. We support recognised programmes such as *ServeWise*, and we also provide our members with access to free online training through the *Responsible Service of Alcohol Standards* course, as well as in-person Host Responsibility workshops across the country.

15. Training in Host Responsibility is already a requirement under the Sale and Supply of Alcohol Act, and is a standard component of Duty Manager certification and ongoing compliance. For this reason, Hospitality NZ does not support Host Responsibility training being included as a discretionary condition within Local Alcohol Policies (LAPs), as it duplicates existing legal obligations and adds unnecessary administrative burden.

16. However, should any host responsibility training conditions be considered or adopted under this LAP, we recommend that the policy explicitly recognise a range of approved training

programmes, rather than limiting licensees to any single provider in the future. There are several high-quality training options available, including our Responsible Service of Alcohol (RSAS) programme, which meet compliance requirements and reflect industry best practice. Allowing operators flexibility to select the most suitable training solution ensures both effectiveness and practicality.

Sensitive premises

17. Of particular concern to us are the recent amendments to the Sale and Supply of Alcohol Act 2012 (SSAA) and the way these changes may interact with local policy provisions. Specifically, we note that the current clause requires existing license holders to demonstrate evidence of consultation with every sensitive site established within 50 metres of their premises as part of any renewal application. While this does not explicitly prevent a license from being renewed, it introduces additional procedural hurdles and uncertainty for operators whose businesses were established prior to the sensitive site commencing operations.

18. We believe this approach risks unfairly penalising hospitality businesses simply because a sensitive site chose to locate nearby after the premises was already operating legally. To avoid unintended consequences and unnecessary compliance burdens on responsible operators, we strongly recommend amending the location provisions to make it clear that any proximity requirements or consultation obligations will apply only to new license applications, and not to renewals for existing premises that were established before the sensitive site came into being.

Recommendations

19. In summary, Hospitality New Zealand welcomes the opportunity to be involved early in the review of the Southland/Invercargill Combined Local Alcohol Policy (LAP). We appreciate the chance to contribute constructively to ensure a balanced policy that supports both community wellbeing and the viability of the hospitality sector.

    We respectfully submit the following key recommendations:

    - Maintain the current trading hours for on-licensed premises.
    - Discretionary conditions should not be applied by default but only in response to documented, premises-specific concerns supported by evidence.
    - Training requirements should explicitly allow for a range of accredited programmes, including those developed and endorsed by industry in partnership with enforcement agencies.
    - Amend the location provisions to ensure that proximity requirements and consultation obligations relating to sensitive sites apply only to new licence applications, and not to existing licensed premises that were established before the sensitive site commenced operations.

Conclusion

20. Existing statutory tools and conditions under the Act should be the primary mechanism for ensuring compliance and managing harm, rather than layering additional obligations unnecessarily.

21. What we want to focus on here is alternative tools that can be considered to help minimise alcohol related harm in cities, instead of or in combination with a well-developed LAP. Hospitality New Zealand has a strong track record of working with stakeholders to drive desirable outcomes.

22. We thank the Southland District Council and Invercargill City Council for the opportunity to provide input into early consultation for the review of the Southland/Invercargill Combined Local Alcohol Policy (LAP).

23. We would be happy to discuss any parts of this submission in more detail, and to provide any assistance that may be required.

Alcohol Healthwatch
Whakatūpato Waipiro

Pre-engagement feedback on the Southland/Invercargill Combined Local Alcohol Policy

30 June 2025

Kia ora

Thank you for the opportunity to provide feedback on the joint Local Alcohol Policy review.

If you have any questions on the comments we have included in our feedback, please contact:

Jennifer Lamm
Policy Advisor
Alcohol Healthwatch
T:
E:

About Alcohol Healthwatch

Alcohol Healthwatch is an independent national charity working to reduce alcohol-related harm and inequities. We provide a range of regional and national health promotion services such as providing evidence-based information and advice on policy and planning matters, supporting community action projects, and coordinating networks to address alcohol-related harm such as the Cross-council Local Alcohol Policy Network.

General Comments

1. Alcohol Healthwatch commends the Council on commencing the review of the 2019 joint Local Alcohol Policy (LAP), and we are grateful for the opportunity to comment at this early stage of the process.

2. Our feedback reflects our overall recommendation that the reviewed LAP include the full range of policies that are set out in section 77(1) of the Sale and Supply of Alcohol Act 2012 (the Act).

Alcohol-related harm

3. Of all drugs available in our society, alcohol is the most harmful[1]. Alcohol is a leading cause of preventable death, injury[2] and ill health in Aotearoa New Zealand and a

significant contributor to the social and health inequities experienced by Māori[3], Pacific peoples and other impacted groups.

4. Alcohol is a component cause for more than 200 disease and injury conditions[4], and is the leading behavioural risk factor for death and disability adjusted life years lost among New Zealanders aged 15 to 49 years[5].

5. The cost of alcohol-related harm in Aotearoa has been estimated at over $9.1 billion annually[6] [7]. The harms are far-reaching and deeply felt by many families/whanau and communities particularly in areas of high deprivation.

Local Alcohol Policies

6. We strongly believe that a LAP should not be considered in isolation but should be seen as part of a cohesive package to reduce alcohol-related harm that includes alcohol bans[8] alcohol licensing fees[9] and alcohol-related strategies and initiatives as well as a LAP.

7. A LAP which has the effect of reducing the overall availability of alcohol has significant potential to further minimise alcohol-related harm and improve community well-being. Measures that reduce accessibility and availability of alcohol have particular benefits for those who experience significant inequities in harm. To date, alcohol outlets in Aotearoa New Zealand, have been inequitably distributed to the most deprived neighbourhoods and the unequal harms from this can be addressed through a LAP[10].

8. By incorporating evidence-based measures to address both the physical (location) and temporal (operating hours) availability of alcohol, a LAP can support other harm reduction interventions in the local area and assist in sending a strong signal to communities regarding the harms associated with alcohol use.

9. Policies in a LAP should be aligned to the object of the Act, and rather than focus on the "benefits of the alcohol economy within the district"[11], should reflect the needs of the community[12], supported by evidence for reducing alcohol-related harm[13].

10. LAPs can include the full range of policies that are set out in section 77(1) of the Act, namely policies on:
    - Location of premises in "broad areas" - section 77(1)(a)
    - Proximity to other premises – section 77(1)(b)
    - Proximity to "sensitive premises" – section 77(1)(c)
    - Issuing of further licences – section 77(1)(d)
    - Trading hours - section 77(1)(e)

- Discretionary conditions - section 77(1)(f)
- One-way door policy - section 77(1)(g).

11. The review of the joint 2019 LAP is timely and provides an opportunity for the LAP to reflect:
    - The Sale and Supply of Alcohol (Community Participation) Amendment Act 2023[14] that made it easier for communities to have a say in alcohol regulation and simplified the process to develop a LAP by removing the ability to appeal provisional LAPs[15];
    - The Supreme Court decision on the Auckland Council Provisional LAP[16] that affirmed that "a precautionary approach is open and that, in any event, a restriction may be justified on the basis of there being a reasonable likelihood that it will reduce alcohol-related harm",[17] and that "policies that are implemented by a local alcohol policy can be based on, or at least influenced by, community preference",[18]
    - The changing environment and emerging issues in Invercargill City and the Southland District;
    - The desirability of ensuring greater consistency and synergy with LAPs across Aotearoa New Zealand; and
    - The growing acceptance that a LAP can provide greater certainty and clarity for the public, licensing bodies and regulatory agencies as well as licensees.

Specific comments

Location of Premises

Section 77(1)(a) – Broad Areas

12. Through a LAP, territorial authorities may restrict licensed premises to a particular "broad area" such as a commercial or industrial zone but must first have regard to the district plan and its objectives and policies (section 78(2)(a) of the Act). We believe that the review of the LAP presents an opportunity to include a policy on "broad areas" with locations clearly identified where licensed premises can be established.[19] A clearly articulated "broad areas" policy can also complement and support other policies, including the policy on trading hours (section 77(1)(e)) and the restriction on licensed premises locating in close proximity to "sensitive premises" (section 77(1)(c)).

Section 77(1)(b) – Proximity to Other Premises

13. We recommend the inclusion of a policy preventing new licensed premises from being located in close proximity to other licensed premises. Setting a distance rule would address the harm associated with the clustering of premises and could see, for example,

off-licensed premises prevented from being established within, say, 50[20] or 100[21] metres of an existing off-licensed premises. We also consider it prudent to consider this policy based on predicted growth in population and amenities and services (including licensed premises) during the period the reviewed LAP is in force, particularly in Invercargill City.[22]

Section 77(1)(c) - Proximity to Sensitive Premises

14. There is a need to generally protect vulnerable users of sensitive premises from exposure to off-licence, on-licence and club licence premises and the associated negative amenity effects. Protecting vulnerable populations and users of sensitive premises can also assist to address their disproportionate and inequitable exposure to alcohol and experience of alcohol harms, particularly for young people.[23]

15. The current LAP, like most council LAPs, has a sensitive premises policy with a minimum distance of 50 metres between a new on-licence, off-licence or club licence and a sensitive facility[24]. We support the continuation of this policy that can prevent new licensed premises locating in close proximity to any school, childcare facility, pre-school, or other facility providing for the education or care of children, any place of religious gathering or assembly, any residential activity and any community facility (including playgrounds).

16. In addition, we recommend that consideration be given to expanding the range of sensitive premises subject to this policy to include health facilities (including rehabilitation treatment centres), marae and fale Pasifika.

Section 77(1)(d) – Issuing of Further Licences

17. In Aotearoa New Zealand, alcohol outlets are over-concentrated in the most deprived areas, and this impacts Māori and Pacific peoples more than other demographic groups.[25,26,27] We believe that a policy on the issuing of further licences would reflect community concerns[28] and also align with research on the relationship between the proliferation of licenced premises and accessibility to alcohol and alcohol-related harm.[29,30,31] A policy that institutes a cap or sinking lid can halt or reduce the existing numbers of outlets, particularly in areas where licensed premises have reached saturation levels or are located in high socio-deprivation areas[32].

Maximum Trading Hours

Section 77(1)(e) – Trading Hours

18. Studies have shown that hazardous drinking increases with longer hours and greater availability[33,34,35]. Setting trading hours in a LAP provides guidance to a District Licensing

Committee and can address community concerns, as longer trading hours are associated with an increase in hazardous drinking.

19. As the vast majority of alcohol is purchased from off-licences (over 80%) and often cheaply, we strongly recommend that the current trading hours of 7am to 11pm in the current LAP be reduced to 9am to 9pm. These reduced hours reflect the trend in LAPs across Aotearoa New Zealand, particularly since the Supreme Court decision on Auckland Council's Provisional LAP that has resulted in off-licences closing at 9pm in Tāmaki Makaurau-Auckland.

20. Reduced trading hours help reduce the opportunity of hazardous drinking and "pre-loading", "side-loading" and "post-loading" and consequently lessen the incidence of other harms (assault, unintentional injury, drink driving) associated with extended trading hours[36]. Studies have also estimated that implementing stricter limits on off-licence trading hours and density could decrease overall alcohol consumption in Aotearoa New Zealand by 17.9% resulting in a gain of 450,000 health-adjusted life years (HALYs) over the lifetime of the current population[37].

21. Reducing the trading hours of on-licences and club licences would also help reduce alcohol-related harm that is associated with longer hours. We therefore recommend that consideration be given to reducing trading hours for these licences, including a later opening hour than 8am.

Discretionary Conditions

Section 77(1)(f) – Discretionary Conditions

22. We support the continuation of the current discretionary conditions in the LAP, such as those that address host responsibility and the management of premises and conditions that are aligned to Crime Prevention through Environmental Design (CPTED) principles.

23. We strongly recommend additional conditions in the LAP, such as conditions that would prevent special licences being granted for events on school grounds or for events focused on children and young people under 18 years to limit their exposure to alcohol.

24. We also recommend the following discretionary conditions for off-licences:

    (a) *restrictions on single sales*, as such sales generally make alcohol affordable and are often linked to hazardous drinking by vulnerable people;

    (b) *limitations on alcohol-related exterior signage or advertising*, as this would reduce the exposure of children to alcohol-related advertising and promotions.[38] Exposure to

alcohol advertising is a known risk factor for alcohol-related harm, contributing to both the amount consumed and frequency of alcohol use. It works on a number of levels including normalising, glamorising, and embedding alcohol consumption into day-to-day settings. Children and young people are at a greater risk from harm as their developing cognitive skills increase their susceptibility to the influence of advertising. The University of Otago *Kids'Cam* research found that New Zealand children aged 11-13 years were exposed to alcohol marketing on average 4.5 times per day. Māori and Pacific children had levels of exposure five and three times greater than European children, respectively. Research undertaken by Alcohol Healthwatch in Tāmaki Makaurau Auckland echoes the Otago University and other studies[39], and found that 56% of schools had at least one alcohol advertisement within 500 metres; 75% of alcohol advertisements were from nearby licensed premises; 63% of alcohol advertisements were near low decile schools, 66% of schools had one alcohol advertisement in the radius, with the average number of advertisements near schools was two; and 78% of the alcohol advertisements were within 400 metres of the schools.[40] A ban on external advertising can also support CPTED and other measures by prohibiting external signage that obscures the view into/out of the premises.

(c) *restrictions on Buy Now, Pay Later (BNPL)*, as these schemes are considered an inappropriate method of payment and subvert established mechanisms to minimise harm to public health from alcohol by enticing the consumer with a much lower upfront price. The research shows that the use of BNPL services to purchase alcohol increases its perceived affordability, which can lead to greater consumption and related harms. The availability of alcohol at low alcohol prices facilitates moderate drinkers becoming heavy drinkers, and heavy drinkers transitioning to dependent drinkers. The harm associated with economic accessibility and perceived affordability of alcohol is exacerbated where alcohol is readily available in store (eg outlets in close proximity[41], long trading hours) and on-line (eg rapid delivery). Young adults are among the heaviest drinkers[42], they are currently the main consumers of BNPL, are also likely to use rapid delivery for their purchases (often without ID checks), and this makes them particularly vulnerable;

(d) *requirement for mandatory age checks on purchase and delivery*, particularly with the increasing availability of remote sales/delivery. For example, research conducted by Alcohol Healthwatch in Tāmaki Makaurau-Auckland showed that in 73% of alcohol orders did not request age verification on delivery, 49% of alcohol orders were left unattended (contactless) at the door, and 87.5% of delivery companies broke their

own restricted items policy. Alcohol delivered without an ID check may make it easier for under 18 year olds to access alcohol and increases the chances of hazardous drinking;[43]

(e) *restrictions on the marketing and promotion of non-alcoholic products* that pose a high risk of alcohol-related harm, such as drinking games and risky items that encourage dangerous drinking (eg beer pong cups);

(f) *restricting end of aisle sales of alcohol products,* as this is been shown to increase sales by as much as 23 to 43 percent and would have a significant impact on alcohol consumption;[44] and

(g) *requirement to have FASD (Fetal Alcohol Spectrum Disorder) warning signage* within the alcohol area in supermarkets and grocery stores and at point of sale at bottle stores.[45]

One-way door restrictions

Section 77(1)(g) – One-way Door Policy

25. We recommend a mandatory one-way door restriction for certain on-licences premises such as taverns, bars, clubs. One-way door restrictions would help prevent a large number of people coming out of licensed premises at the same time (as would be the case with a universal maximum closing time) and the potential for intoxicated patrons migrating between venues or interacting with others with an increased likelihood of disorder and crime. These conditions also have the potential to reduce the burden on Police, ambulance and hospital services and can have a positive benefit for not only the patrons of premises but the community generally.

Conclusion

26. Alcohol Healthwatch supports the policies in the current LAP that address alcohol-related harm, namely the distance requirement for new licensed premises in proximity to sensitive premises and conditions that address the management of premises. However, we recommend that the full range of policies be included in the draft LAP, as a more comprehensive LAP could reflect community preferences and meet the object of the Act - and reduce the significant burden placed on communities from alcohol-related harm.

References

1 Crossin R, Cleland L, Wilkins C, Rychert M, Adamson S, Potiki T, et al. The New Zealand drug harms ranking study: A multi-criteria decision analysis. J Psychopharmacol (Oxf). 2023 Jun 23; 02698811231182012. Nutt DJ, King LA, Phillips LD. Drug harms in the UK: A multicriteria decision.

2 Alcohol is a significant contributor to interpersonal violence, self-harm (eg suicides), mental health disorders (eg depression), traffic injuries and other harms.

3 Chambers, Tim; Mizdrak, Anja; Jones, Amanda C.; Davies, Anna; Sherk, Adam (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Health New Zealand. Report. https://doi.org/10.60967/healthnz.27048892.v1.

4 Rehm J, Baliunas D, Borges GL, *et al.* The relation between different dimensions of alcohol consumption and burden of disease: an overview. *Addiction* 2010; **105**: 817–43.

5 Institute for Health Metrics and Evaluation (IHME). GBD Compare Data Visualization 2019, New Zealand. Seattle: WA: University of Washington, 2022. https://www.healthdata.org/data-visualization/gbd-compare

6 The total societal cost of alcohol harms in 2023 is approximately $9.1 billion based on the increased risk of morbidity and mortality, with over half ($4.8 billion) due to fetal alcohol spectrum disorder (FASD). New Zealand Institute of Economic Research (NZIER). Cost of alcohol harms in New Zealand: Updating the evidence with recent research (2024): www.health.govt.nz/system/files/documents/publications/costs-of-alcohol-harms-in-new-zealand-2may24-v2.pdf.

7 Environmental Health Intelligence New Zealand. Alcohol-related harm indicators: https://ehinz.ac.nz/indicators/alcohol-related-harm/about-alcohol-related-harm/#alcohol-related-harm-indicators

8 Southland District Council Alcohol Control Bylaw 2022. https://www.southlanddc.govt.nz/assets/Bylaws-policies-and-strategies/bylaws/Final-Alcohol-Control-Bylaw-2022.pdf;

Invercargill City Council Environmental Health Bylaw 2024, Part 3. https://www.icc.govt.nz/repository/libraries/id:2swc6cbtp1cxby8vraxn/hierarchy/assets/council/documents/bylaws/environmental-health-bylaw/Enviromental-Health-Bylaw.pdf

9 Note: Invercargill City Council and Southland District Council set licensing fees according to Sale and Supply of Alcohol (Fees) Regulations 2013. However, the default fees have not kept pace with the costs incurred by councils, and therefore an increasing number of councils have utilised their bylaw-making powers under the Sale and Supply of Alcohol (Fee-setting Bylaws) Order 2013 and set fees (usually 100% cost recovery) through this process.

10 New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No.: 114: https://www.lawcom.govt.nz/sites/default/files/projectAvailableFormats/NZLC%20R114.pdf

11 Southland District Council and Invercargill City Council Joint Committee – Combined Local Alcohol Policy. Agenda 26 September 2019 at page 7. Minutes of 28 August 2019 meeting. https://southland.infocouncil.biz/Open/2019/09/JOI_20190926_AGN_1514_AT.PDF

12 "It is inherent in a licensing regime, and to be expected given the object of the 2012 Act, that controls may have an adverse economic impact on licensees". Auckland Council v Woolworths New Zealand Ltd [2021] NZCA 484 at [41].

13 Ministry of Health New Zealand. (2024). Government Policy Statement on Health 2024-27: https://www.health.govt.nz/system/files/2024-06/government-policy-statement-on-health-2024-2027-v4.pdf

14 Sale and Supply of Alcohol (Community Participation) Amendment Act 2023, No. 60: https://www.legislation.govt.nz/act/public/2023/0060/latest/whole.html.

15 Taituarā. Implementation Guide: Changes to the Sale and Supply of Alcohol Act 2012. 7 September 2023: https://taituara.org.nz/Attachment?Action=Download&Attachment_id=2902.

16 Courts of New Zealand. *Foodstuffs North Island Limited v Auckland Council, Woolworths New Zealand Limited and Alcohol Regulatory and Licensing Authority* – SC 140/2021 [Internet]. Wellington (NZ): Supreme Court of New Zealand; 2023 https://www.courtsofnz.govt.nz/cases/foodstuffs-north-island-limited-v-auckland-council-woolworths-new-zealand-limited-and-alcohol-regulatory-and-licensing-authority. The Auckland LAP came into force 16 September and 9 December 2024.

17 Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council* and *Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45: https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf) at [84].

18 Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council* and *Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45 at [81]. https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf .

19 See for example LAPs for Auckland Council 2024; Horowhenua District Council 2020, Hutt City 2024; New Plymouth and Stratford District Councils Joint LAP 2017; Otorohanga District Council 2024, Porirua City Council (draft) 2025; Selwyn District Council (draft) 2025; Tasman District Council 2015; Tauranga City Council 2024; Waikato District Council (draft) 2017; Waimakariri District Council 2019; Waitomo District Council 2022.

20 For example, see Hauraki District Council Local Alcohol Policy 2022 Waikato District Council PLAP 2022 (under appeal) with 5 kilometres and 1 kilometre distances.

21 For example, see Horowhenua District Council Local Alcohol Policy 2020; Matamata-Piako District Council Local Alcohol Policy 2023.

22 Infometrics. Southland Region forecasting scenarios for Beyond 2025 Southland. June 2023. https://greatsouth.nz/assets/Documents/Infometrics-Great-South-forecast-scenarios-report-Jun-23.pdf

23 Kypri K, Bell ML, Hay GC, Baxter J. Alcohol outlet density and university student drinking: a national study [Internet]. Addiction. 2008;103(7):1131-8. Available from: https://doi.org/10.1111/j.1360-0443.2008.02239.x

24 See for example:
- 200 metres - Rotorua Lakes District Council Local Alcohol Policy 2019 (and 2025 draft)
- 150 metres - Gisborne District Council. Local Alcohol Policy 2024; Selwyn District Council 2025 (draft)
- 100 metres - Wairarapa Local Alcohol Policy 2025 (Carterton, Masterton, South Wairarapa District Councils); Stratford District Council and New Plymouth District Council Joint Local Alcohol Policy 2017; Waikato District Council Local Alcohol Policy (under appeal) 2017; Waipa District Council Local Alcohol Policy 2025; Eastern Bay of Plenty Local Alcohol Policy (under appeal) for Whakatāne, Kawerau and Ōpotiki District Councils; Whanganui District Council Local Alcohol Policy 2019.

We note the similar requirement for vape retailers to be 300 metres of a school or marae and 100 metres from an ECE. See: Ministry of Health-Manatū Hauora, 2025. Location requirements for specialist vape retailers. https://www.health.govt.nz/regulation-legislation/vaping-herbal-smoking-and-smokeless-tobacco/selling-vaping-or-other-notifiable-products/location-requirements-for-specialist-vape-retailers.

25 Hobbs M, Marek L, Wiki J, Campbell M, Deng BY, Sharpe H, McCarthy J, Kingham S. Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand. Health & Place. 2020; 65:1-7. Available from: https://doi.org/10.1016/j.healthplace.2020.102397.

26 Market Economics Limited (M.E. Consulting). New Zealand Alcohol Supply and Demand Structures: Research report. Wellington: Health Promotion Agency, 2018. Available from: https://www.hpa.org.nz/sites/default/files/NZ%20Alcohol%20Supply%20and%20Demand%20Structure%20Research%20Report%20FEB2018-Final.PDF.

27 Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. Health & Place [Internet]. 2014;29:186-99. Available from: https://doi.org/10.1016/j.healthplace.2014.07.002

28 See for example community objections to licence applications and see: Southland District Council and Invercargill City Council Joint Committee – Combined Local Alcohol Policy. Agenda 26 September 2019. https://southland.infocouncil.biz/Open/2019/09/JOI_20190926_AGN_1514_AT.PDF

29 Cameron MP, Cochrane W, Gordon C, Livingston M. Alcohol outlet density and violence: A geographically weighted regression approach [Internet]. Drug and alcohol review. 2016;35(3):280-8: https://doi.org/10.1111/dar.12295

30 Day P, Breetzke G, Kingham S, Campbell M. Close proximity to alcohol outlets is associated with increased serious violent crime in New Zealand [Internet]. Australian and New Zealand journal of public health. 2012;36(1):48-54: https://www.sciencedirect.com/science/article/pii/S1326020023017181?via%3Dihub

31 Campbell CA, Hahn RA, Elder R, Brewer R, Chattopadhyay S, Fielding J, Naimi TS, Toomey T, Lawrence B, Middleton JC, Task Force on Community Preventive Services. The effectiveness of limiting alcohol outlet density as a means of reducing excessive alcohol consumption and alcohol-related harms [Internet]. American journal of preventive medicine. 2009;37(6):556-69: https://doi.org/10.1016/j.amepre.2009.09.028.

32 See for example, Tauranga City Council. Local Alcohol Policy 2024. No new licences issued for bottle stores located within suburbs with a social deprivation index of 9 or 10.

33 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: https://doi.org/10.1111/acer.12359

34 Connor, J., Maclennan, B., Huckle, T., Romeo, J., Davie, G., & Kypri, K. (2021). Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data. *Addiction*, *116*(4), 788-798.

35 For an in-depth examination of trading hours and harm see: New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf.

36 Nepal S, Kypri K, Tekelab T, Hodder RK, Attia J, Bagade T, Chikritzhs T, Miller P. Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review [Internet]. Journal of studies on alcohol and drugs. 2020;81(1):5-23: https://doi.org/10.15288/jsad.2020.81.5

37 Chambers T, Mizdrak A, Herbert S, Davies A, Jones A. The estimated health impact of alcohol interventions in New Zealand: a modelling study. Addiction. 2023. https://doi.org/10.1111/add.16331.

38 See for example Waipā District Council draft LAP 2024 clause 3.1.8(f). See also Auckland District Licensing Committee. Off-licence Premises External Advertising Practice Note. 21 July 2023: https://www.aucklandcouncil.govt.nz/licences-regulations/business-licences/alcohol-licences-fines/docsdlcpracticenotes/dlc-practice-note-external-signage.pdf.

39 Chambers T, Stanley J, Signal L, et al. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. Alcohol 2018; 53: 626–33.

40 Alcohol Healthwatch. Alcohol advertising exposure near schools in Tāmaki Makaurau Auckland. July 2023: https://www.ahw.org.nz/Portals/5/Resources/Fact%20Sheet/Alcohol-Advertising-Exposure-Near%20Schools%20in%20Tamaki%20Mak%20Auckland%20Updated%20new%20ISBN.pdf

41 Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. Health & Place [Internet]. 2014;29:186-99: https://doi.org/10.1016/j.healthplace.2014.07.002.

42 Ministry of Health. Annual Update of Key Results 2020/21: New Zealand Health Survey. 2021; published online Dec 1: https://minhealthnz.shinyapps.io/nz-health-survey-2020-21-annual-data-explorer.

43 Sneyd, S., & Richardson, M. (2024). Online alcohol deliveries: age verification processes of online alcohol delivery companies in Auckland, New Zealand. *The New Zealand medical journal*, *137*(1606), 13-21; 29 November 2024: https://nzmj.org.nz/journal/vol-137-no-1606/online-alcohol-deliveries-age-verification-processes-of-online-alcohol-delivery-companies-in-auckland-new-zealand and see : Sneyd, S. & Richardson, M. (2024). Alcohol Home Deliveries: age verification processes of online alcohol delivery companies in Auckland, New Zealand. Auckland, New Zealand: https://www.ahw.org.nz/Portals/5/Resources/Documents-other/2024/Alcohol%20Home%20Deliveries%20HIGH%20DEF.pdf.

44 Nakamura R, Pechey R, Suhrcke M, Jebb SA, Marteau TM. Sales impact of displaying alcoholic and non-alcoholic beverages in end-of-aisle locations: an observational study. Soc Sci Med. 2014 May;108(100):68-73. doi: 10.1016/j.socscimed.2014.02.032. Epub 2014 Feb 22. PMID: 24632050; PMCID: PMC4008933.

45 The societal cost of fetal alcohol spectrum disorder (FASD) has been calculated at $4.8 billion annually. New Zealand Institute of Economic Research (NZIER). Cost of alcohol harms in New Zealand: Updating the evidence with recent research (2024): www.health.govt.nz/system/files/documents/publications/costs-of-alcohol-harms-in-new-zealand-2may24-v2.pdf.

Health New Zealand
Te Whatu Ora

12 August 2025

Southland District Council
15 Foth St
P.O.Box 903
Invercargill 9840

Attn: Ana Bremer

Dear Ana,

Revision of Southland Local Alcohol Policy

Thank you for the opportunity to provide preliminary feedback on an early draft of the Southland Local Alcohol Policy (LAP). We will provide a formal submission in due course, once the draft policy is out for consultation.

Our suggestions in this preliminary feedback are evidence-based.[1] We believe all these suggestions should be incorporated, at least as options, in the draft LAP put to the public, to enable a robust and informed public consultation process.

Alcohol is the most harmful drug in New Zealand,[2] and LAPs are one important tool to address this harm. In New Zealand, every year, alcohol causes around 900 deaths, 1,250 cancers, 30,000 hospitalisations, and 130,000 ACC claims.[3] The annual economic cost to New Zealand is conservatively estimated by the New Zealand Institute of Economic Research at $9.1 billion dollars.[4] The New Zealand Health Survey found that Southlanders have the highest prevalence of weekly heavy episodic drinking in New Zealand, so it is likely that Southland experiences more than its fair share of these alcohol-related harms and costs.

Most New Zealanders are unaware of the full extent of the harm alcohol causes. For example, most New Zealanders are unaware that there is no minimum level of alcohol consumption that does not increase the risk of cancer.[5] While 1-3 standard drinks per week is 'low risk', it is not 'no risk'.[6] New

---

[1] Due to the tight timeframes, we have not provided a complete list of references in this document but will do so in our formal submission.
[2] Crossin, R., Cleland, L., Wilkins, C., Rychert, M., Adamson, S., Potiki, T., ... & Boden, J. (2023). The New Zealand drug harms ranking study: A multi-criteria decision analysis. *Journal of Psychopharmacology*, *37*(9), 891-903.
[3] Chambers T., Mizdrak A., Jones A.C., Davies, A. Sherk, A. (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Wellington, New Zealand.
[4] NZIER. 2024. Costs of alcohol harms in New Zealand: Updating the evidence with recent research. A report for the Ministry of Health.
[5] Royal Society Te Aparangi, 2024, Alcohol Causes Cancer.
[6] Ibid

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Zealand's low-risk drinking guidelines are out of date and do not align with current research findings that there is no safe level of alcohol consumption, particularly for cancer risk.[7]

LAPs are one important tool at our disposal to address New Zealand's most harmful drug. LAPs should be proportionate to the extremely high burden of alcohol-related harm; they should cover every aspect that has the potential to decrease this harm in the community. It is important to note that LAPs should not simply focus on acute harms, such as ED admissions, or crime caused by intoxicated people, but also on the extremely large burden of harm caused by chronic health conditions, such as foetal alcohol spectrum disorder (the single largest contributor to the $9.1 billion alcohol harm cost), cancer (including breast, bowel, mouth, throat, and liver), liver cirrhosis, cardiovascular disease, and mental health disorders. The Sale and Supply of Alcohol Act 2012 clearly defines harm in the Object of the Act as any harm, and any disease, disorderly behaviour, illness, or injury:

> **4. Object**
>
> (1) The object of this Act 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.
>
> (2) For the purposes of subsection (1), the harm caused by the excessive or inappropriate consumption of alcohol includes—
>
> (a) any crime, damage, death, disease, disorderly behaviour, illness, or injury, directly or indirectly caused, or directly or indirectly contributed to, by the excessive or inappropriate consumption of alcohol; and
>
> (b) any harm to society generally or the community, directly or indirectly caused, or directly or indirectly contributed to, by any crime, damage, death, disease, disorderly behaviour, illness, or injury of a kind described in paragraph (a).

Global health viewpoint

The following policies recommended by the World Health Organization are proven to reduce alcohol-related harm, and are relevant to Local Alcohol Policies:[8]

Strengthen restrictions on **availability.**

Limiting alcohol **advertising and promotion.**

---

[7] Alcohol Healthwatch (2025) Media release 16 July 2025 Obtained from: https://www.ahw.org.nz/Portals/5/Resources/media/2025/Media%20Release%20-%20Low%20risk%20drinking%20guidelines%20media%20release%2016_7_25%20Updated%20V3.pdf 25/07/2025

[8] World Health Organisation: Brief 14: Snapshot series on alcohol control policies and practice. Accessed from: https://iris.who.int/bitstream/handle/10665/381461/9789240110083-eng.pdf?sequence=1 05/08202 control policies and practice. Accessed from: https://iris.who.int/bitstream/handle/10665/381461/9789240110083-eng.pdf?sequence=1 05/08/2025

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Government viewpoint

The current Government has placed great importance on addressing alcohol-related harm, evidenced by the fact that alcohol is one of the five modifiable risk factors prioritised in the Government Policy Statement on Health 2024 – 2027.

The Sale and Supply of Alcohol Act empowers local authorities to act; "Local communities will have more say about where and when alcohol can be sold – local authorities will be able to limit the sale of alcohol, set conditions on licences and there will be broader criteria for objecting to alcohol licence applications, through local area plans."[9]

Preliminary feedback on the current Southland draft LAP

The draft LAP needs to be strengthened to be effective and proportionate to the extremely high burden of harm caused by alcohol. It is important that the Southland District Council is aware of the Supreme Court judgement confirming that LAPs may include conditions where there is a real and appreciable ***possibility***, rather than a ***certainty,*** that they may reduce alcohol-related harm.[10] This is referred to as the **Precautionary Principle**.

Territorial authorities may apply the precautionary principle when drafting a LAP. Given the extremely high burden of alcohol-related harm in Southland, the precautionary principle should be applied in all policy areas relating to licensing where there is real and appreciable possibility that a particular policy measure may reduce alcohol-related harm. We encourage Southland District Council to actively look for and include such policy measures in the draft LAP put to the public for consultation.

Our comments on your draft appear as follows:

Sensitive sites

We support the inclusion of marae, fale Pacifica and healthcare facilities, (including rehabilitation treatment centres), to the sensitive premises list. We also support the expanded list of education facilities.

We recommend the extension of the separation distance to sensitive facilities from 50m to 100m, and a ban on new licences being granted within 100m, rather than simply a requirement to consult.

Trading hours

On-licences

- We recommend that on-licensed premises close of trading hours move from 3.00am to 1.00am so as to be consistent with maximum trading hours we are advocating for Invercargill. We would also suggest that an 8am opening time is too early and should be no earlier than 9:00am.
- We suggest the "on-licences – other" dot point is deleted as it provides for an unrestricted environment. We suggest the LAP should be silent for these other arrangements and that

[9] Alcohol Bill drives change in NZ's drinking culture | Beehive.govt.nz
[10] Hearing-13-and-14-September-2022-First-respondent-submissions.pdf

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the provisions applying to taverns and restaurants should be used as a guide. We are unaware of any other Local Alcohol policies that have a permissive clause of this nature.

Off-licences

- We recommend all off-license hours to move from 9.00am to 9.00pm. We commend you for noting these hours have been included as an option for your draft Local Alcohol Policy.

Club licences

- Maximum operating hours for Club Licences should meet the requirements of the club but they should not be any more permissive than what we have recommended for on-licences (above).

Special licences

- For Special Licences we recommend that the event finishes no later than 1.00am. We also recommend a duration of no more than 6 hours. Special Licenses outside these hours can be considered for international sports events at existing on-licenced or club licenced premises provided there has been a sufficient break in the service of alcohol. The Waikato District Council supports 1.00am closing. The 6-hour duration is currently practiced in the Central Otago District and the break in service clause is in the existing Dunedin City Local Alcohol Policy.

- For Special Licences, we recommend that for child-focused or family events, they are not granted (S77(1)f). This is drawn from the Wairoa District Local Alcohol Policy.[11] A child focused event is one that is focused on minors, or secondary school students regardless of age, that includes but is not limited to galas, school fairs, children's sports games, school kapa haka events, school balls and leavers functions etc.
- For Special Licences we recommend that the event finishes no later than 1.00am. We also recommend a duration of no more than 6 hours. Special Licenses outside these hours can be considered for international sports events at existing on-licenced or club licenced premises provided there has been a sufficient break in the service of alcohol. The Waikato District Council supports 1.00am closing. The 6-hour duration is currently practiced in the Central Otago District and the break in service clause is in the existing Dunedin City Local Alcohol Policy.

Discretionary Conditions

Signage and advertising

- Store advertising of alcohol is a key source of alcohol advertising exposure to New Zealand children. While you have acknowledged a need to restrict alcohol related signage to no more than 50% of the area of the external area of the premises, we recommend that

[11] Wairoa District Council 2021: Local Alcohol Policy: Retrieved from Local-Alcohol-Policy.pdf (wairoadc.govt.nz)

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for off-license premises this is strengthened so that there is no promotional advertising on the premises' exterior and signage apart from the name of the store (S77(1)f).[12] Also for off-license premises, ensure that the front window area is frosted to a height of 1.5 metres and not to display alcohol above this height or in a manner visible to those walking or driving past the store (S77(1)f).[13]

Off-licence Density

- In New Zealand, over 75% of total alcohol consumed is from off-licences, and 72% of drinking occasions among high-risk drinkers occur at locations outside of on-licences. Because of these facts, most alcohol-related harm is associated with off-licences. Therefore, in line with the WHO's proven policy initiatives to minimise alcohol-related harm, a strong focus of the Local Alcohol Policy must be on measures that will make off-licence purchases of alcohol less affordable, less available, less visible, and safer.
- There is a higher density of off-licences in the most deprived areas of Southland although we do note that the towns tend to be more deprived than the rural areas. Areas with NZDep 2018 decile 7, 8, 9 and 10 together accounted for 71% of Southland Hospital alcohol-related ED visits, with the 9th decile alone contributing 27% of all such visits. We are aware that the proportion of Southland ED visits arising from the Southland District will be low. Corrected for population size, the yearly rate of ED presentations increases steadily with higher deprivation. To help address this issue, we recommend a sinking lid (or at the very minimum, a freeze) on the issue of off-licences in NZDep 7 to 10 areas (2023 census) in Southland (S771)a)).

Staffing

- Your dot point under "Staffing" as it relates to Club Licences is good, but it needs to be strengthened to the effect that certified duty managers to be present at all Club licences trading after 8.00pm or if there are more than 50 patrons present (S77(1)f).

Host responsibility

- For Off licences that deliver alcohol, we recommend a minimum of three hours between placement of an order and delivery of alcohol to a customer. This has been suggested for inclusion in a Local Alcohol Policy in the Queenstown-Lakes District.
- We recommend a clause that effectively states that alcohol deliveries cannot take place outside the maximum hours permitted for an off-licence.
- Buy now/pay later schemes (e.g. "Layby®" or "Afterpay®") promote impulse spending,[14] so are not appropriate for purchasing an addictive, harmful drug like alcohol. We recommend the prohibition on use of credit/after pay services to procure alcohol from off-licences (S77(1)f). This condition is promoted in the Waikato District Council Provisional Local Alcohol Policy.

---

[12] [2021] NZARLA 123. Obtained from: https://forms.justice.govt.nz/search/Documents/ARLA/arla_DECN_175037788/ARLA_FULL.pdf 25/07/2025
[13] [2023] NZARLA 18: Obtained from: https://forms.justice.govt.nz/search/Documents/ARLA/arla_DECN_195241207/ARLA_FULL.pdf 25/07/25
[14] O'Brien L, Ramsay I, Ali P. Innovation, Disruption and Consumer Harm in the Buy Now Pay Later Industry: An Empirical Study. University of New South Wales Law Journal. 2024;47:2, 2024 (forthcoming), Available from: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4635958

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- We recommend the maximum number of drinks per serve for special licence events to be no more than two standard drinks, and where the event is high-risk, including but not limited to events targeting younger age-groups, no more than one standard drink per serve S77(1)f). Being only able to purchase a small number of drinks provides for those serving the drinks to assess the patron's level of intoxication.
- We support your recommendation that there should be restrictions on the use of glass for special licence events.
- We note that your draft LAP makes provision for a register of incidents. For applicants for a new on-licence or off-licence we recommend there is provision for the requirement for a prospective licensee to produce a local Social Impact Report to support their licence application(S77(1)f). These provisions are consistent with the Auckland Local Alcohol Policy.
- For off-licence applications, we recommend prohibitions on single sales of shots, RTDs and mainstream beers (exemption for craft beers) (S77(1)f).
- Consider the closure of relevant off licences at sensitive times (e.g. school pick-up times) (S77(1)f). This has been applied in the Rotorua-Lakes and Whakatane Districts on what we understand to be a voluntary basis as there is a reference to it in the media[15] but it does not appear in their Local Alcohol Policy.

Again thank-you for the opportunity to view and comment your draft Local Alcohol Policy.

Nga mihi

Dr Michael Butchard
Medical Officer of Health

[15] See https://www.nzherald.co.nz/rotorua-daily-post/news/liquor-store-to-close-as-pupils-pass/HCXZRTH3LWIDFW3KDCHOU4336Y/

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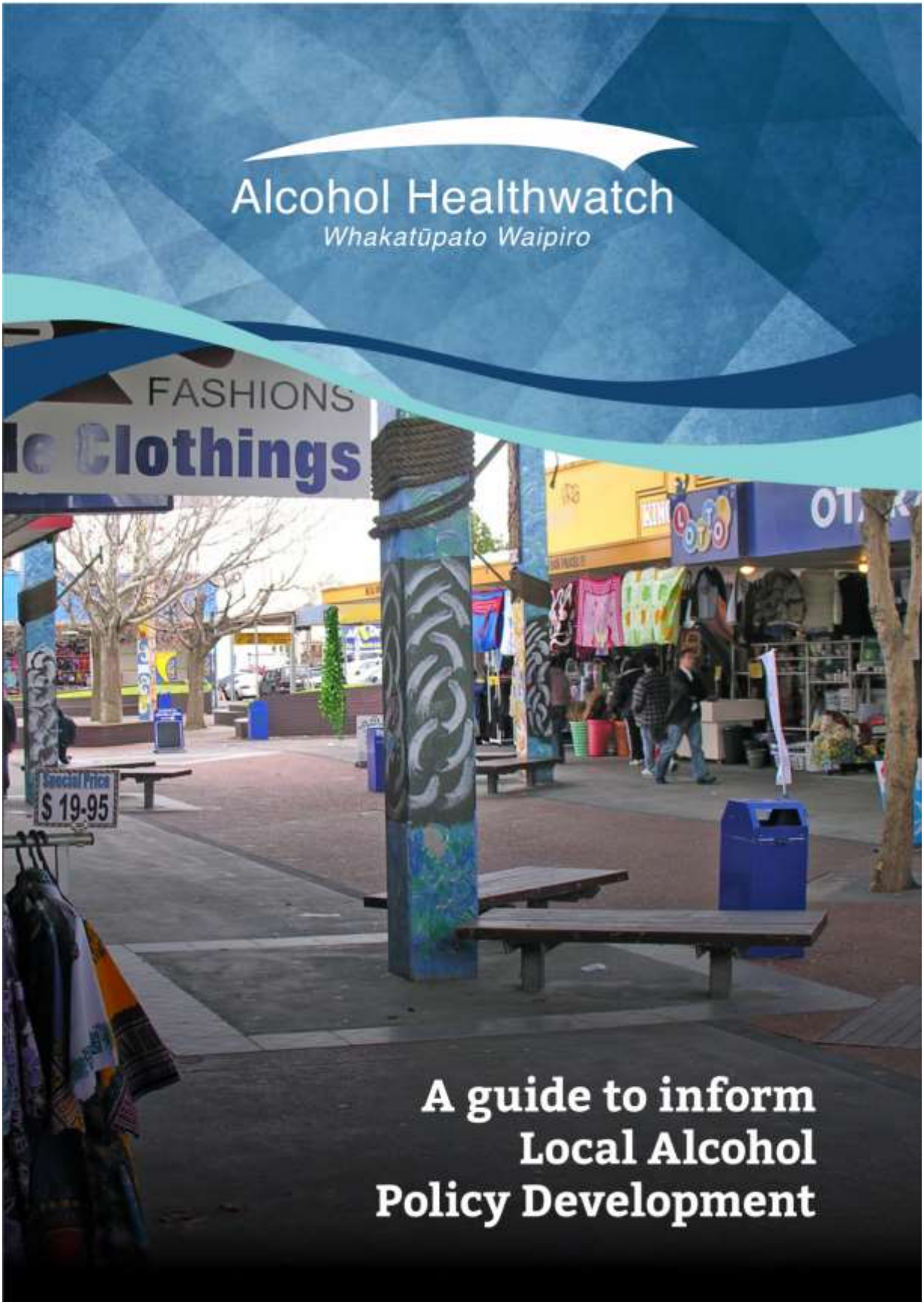
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Abbreviations

ARLA	Alcohol Regulatory and Licensing Authority: Te Mana Waeture Take Waipiro
BNPL	Buy Now Pay Later
CIP	Cumulative Impact Policy
DLC	District Licensing Committee
LAP	Local Alcohol Policy
PLAP	Provisional Local Alcohol Policy
TA	Territorial Authority

Summary

The purpose of this guide is to provide a summary of the rationale for, and evidence underpinning, alcohol control measures available to Territorial Authorities (TAs) through Local Alcohol Policies (LAPs) as prescribed by the Sale and Supply of Alcohol Act 2012 (the Act). Current examples of implementation of LAP provisions by TAs are also provided. As the licensing and control of alcohol is not static, this guide is to be considered a living document to be updated over time, when required. It is to be read alongside other central and local government guidance on LAPs.

The guide illustrates a strong rationale and evidence base for many of the harm minimisation measures available through LAPs. In particular, restrictions on trading hours and measures to limit the clustering and density of licensed premises are supported by a comprehensive evidence. Restrictions on the location of licensed premises in relation to facilities (e.g. sensitive sites such as schools) are supported by more indirect evidence of the harm that may arise for vulnerable groups from close location to alcohol sales. However, as a comprehensive literature search was not undertaken to compile this guide, relevant studies may have been omitted. Furthermore, very few evaluations of the effects of policy interventions were identified. As such, most of the evidence in this guide relates to the association between licensing-related factors and alcohol harm.

The report found similarity with approaches used by TAs across Aotearoa New Zealand, and several differences that reflect localism of policy development. For example, there were no standard times applied to the 'one-way door' practice, or standard spatial proximity restrictions between new licences and existing licences or between new licences and sensitive sites. When considered as a whole, there was also a sense that the regulatory approaches to alcohol licensing and control were somewhat piecemeal and largely reflected the status quo. The risk of costly and lengthy appeals prior to the enactment of the Sale and Supply of Alcohol (Community Participation) Amendment Act 2023 (the 2023 Amendment Act)[1] likely played a role in very few LAPs containing substantial restrictions to alcohol availability.

The guide provides an overview of LAPs and the weight given to these statutory policies in decision-making, e.g. licensing decisions by a District Licensing Committee (DLC) and the Alcohol Regulatory and Licensing Authority: Te Mana Waeture Take Waipiro (ARLA). It also places LAPs in the context of other national and international approaches to reducing alcohol harm and inequities, and examines alcohol harm generally and the definition given to it in terms of the object of the Act. Following on from this, the guide focusses on the process of developing a LAP and what it can cover, that is: the types of licences (on-licences, off-licences, club licences [excluding those with a permanent charter = and special licences]; the area covered (all or part of the district, or districts if a joint LAP); and the policies that may be included as set out in section 77(1) of the Act.

Best practice recommendations

Through examination of TA LAPs, council research reports and documents, the 2012 Act, the Sale and Supply of Alcohol Regulations 2013 (the Regulations), the Local Government Act 2002 and the New Zealand Law Commission's report *Alcohol in Our Lives: Curbing the Harm*[2], the following best practice recommendations are made to maximise the effectiveness of a LAP:

- be clear about the policy objectives/purpose of the LAP,
- collect a range of baseline indicators to inform LAP development,
- plan the review and evaluation from the outset of LAP development,
- ensure mana whenua are co-designers in the LAP process,
- utilise a range of innovative approaches to gather public feedback on the draft policy
- prioritise measures that address inequity – (e.g. the proliferation of off-licences in socio-economically deprived communities),
- utilise measures to reduce the physical (location) and temporal (days, hours) availability of off-licence alcohol as these have the greatest potential to minimise harm across the population, by reducing consumption and related harm, improving amenity, addressing price competition and minimising exposure to alcohol advertising,
- consider the LAP as a package of interventions, not as individual elements, that can also support other council initiatives to reduce harm,
- include a broad range of discretionary conditions, and
- go beyond the status quo (to the extent permitted by the Act) regarding policies in the district/city to minimise harm.

Further updates of the Guide

Finally, it is noted that the Act received Royal Assent on 18 December 2012. In the 11 years since it came into force, of the 67 TAs in New Zealand, 41 have a LAP currently in force, covering 35% of the population. Of the remaining 26 TAs,15 have not developed a LAP to a draft or provisional stage, and of the 11 that have developed a draft or Provisional LAP (PLAP), 5 have halted or abandoned their PLAP following appeal.

However, it is anticipated that there will be a sharp increase in the number of TAs who undertake the process to develop and review a LAP for their district following the enactment of the 2023 Amendment Act[3] that removed the ability to appeal PLAPs. Thus, this guide will be updated regularly to reflect the current status of LAP development throughout Aotearoa New Zealand.

Introduction

Background

Recognising that there is currently no central document that has collated relevant and updated research and information, the purpose of this guide is to provide a summary of the licensing and alcohol control measures available in Local Alcohol Policies (LAPs) for Territorial Authorities (TAs) across Aotearoa New Zealand. It summarises the rationale and evidence for each control measure and identifies the similarities and differences in approaches used in LAPs across councils that have progressed to adopting their LAP.

It is recommended that this guide be read alongside the Ministry of Justice guidance on *Local Alcohol Policies*[4] and *Recent changes to the Sale and Supply of Alcohol Act 2012*[5], and the Auckland Council report *Literature Review of Mechanisms to Regulate the Supply of Alcohol for the Development of Auckland Council's Local Alcohol Policy*[6]. This guide is timely, as many TAs are undertaking their six-year reviews of their adopted policy, the Supreme Court has released its decision on the Auckland Council Provisional LAP[7] (now in force) and the Sale and Supply of Alcohol Act (Community Participation) Amendment Act 2023 (the 2023 Amendment Act)[8] has been passed.

Wider local, national and international context

A LAP can be considered as one important component of a comprehensive local government approach to reducing alcohol harm and inequities. Ideally, the LAP would sit within a council-wide alcohol harm reduction strategy that demonstrates to sectors and communities the range of actions that the TA will utilise to reduce harm. Other important components of a local government strategy might include:

- governance and national advocacy on alcohol policy,
- the implementation of local government bylaws and policies (e.g. alcohol control bylaws, signage bylaws, policies about advertising on council facilities and infrastructure, alcohol-free council events),
- alcohol licensing and related public participation in licensing activities, community development initiatives, and so forth.

Limiting alcohol availability also supports national recommendations for stronger alcohol regulation from, for example, the New Zealand Cancer Control Agency[9], Te Hiringa Hauora-Health Promotion Agency (now Health Promotion, Health New Zealand | Te Whatu Ora)[10] and the Panel on the Government Inquiry into Mental Health and Addiction[11].

Finally, from a global perspective, a LAP that restricts alcohol availability supports the actions outlined in the World Health Organization's Global Alcohol Action Plan 2022-2030[12] (endorsed by New Zealand) that calls on Member States to implement effective alcohol policies[13]. One of the high-impact policies listed in the Global Alcohol Action Plan is to address the availability of alcohol, by enacting and enforcing restrictions on the spatial and temporal availability of alcoholic beverages.

Alcohol harm

Of all the drugs available in society, alcohol is the most harmful drug when considered in relation to its widespread harm to the user and to others[14 15 16 17]. It is well understood that alcohol-related harms are vast, immediate and long term, occur across the levels of consumption, and result in substantial health, social and economic costs. Much of the harm is shouldered by local communities in the form of crime, loss of safety and reduced amenity.

Alcohol outlets are over-concentrated in Aotearoa's most deprived areas., Close proximity to outlets is associated with increased hazardous drinking and crime, and these harms impact Māori and Pacific peoples more than other demographic groups[18 19 20].

Exposure to alcohol advertising has also been linked to youth drinking earlier and heavier, with tamariki Māori five times and Pacific children three times more likely to be exposed to alcohol advertising than non- Māori / non-Pacific children[21 22].

Restricting the availability of alcohol is one of the three strongest policy levers available to reduce alcohol use and harm, alongside addressing the low price and/or high affordability of alcohol and restricting alcohol advertising and sponsorship[23]. Restrictions to availability include measures that restrict:

- the physical availability of alcohol (e.g. the density and location of places that sell it),
- its temporal availability (e.g. days and hours of alcohol sales) and modes of retail sales (e.g. online/remote delivery), and
- the sale and supply of alcohol at certain places and special events (e.g. festivals, community events)[24].

It is important to note that restrictions to local alcohol availability can also help to address the other two strong determinants of alcohol use and harm in communities, namely, the low price of alcohol and its marketing. Having fewer places that sell alcohol in a neighbourhood is likely to result in less price competition and less marketing. Restrictions on the number and location of licensed premises in a community also offer opportunities to reduce exposure to alcohol signs and marketing at licensed premises, a key source of alcohol advertising exposure to New Zealand children[25].

The harm from licensed premises is not equal across communities. Characteristics of local communities found to moderate the association between licensed premises density and harm include area-level deprivation[26 27 28 29], population density[30], age structures[31], presence of social housing and/or vacant land use nearby[32], and ethnic composition[33]. For example, Māori and young Pacific males (15 to 24 years) have been found to be more negatively impacted by living close to alcohol outlets (note: on-licence and off-licence types combined)[34].

Definition of alcohol harm in law

Unlike the previous legislation (the Sale of Liquor Act 1989), the 2012 Act provides a definition of "alcohol harm" as found in the object of the Act (section 4(2)):

> ***4 Object***
>
> *(1) The object of this Act 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.*
>
> *(2) For the purposes of subsection (1), the harm caused by the excessive or inappropriate consumption of alcohol includes—*
>
> *(a) any crime, damage, death, disease, disorderly behaviour, illness, or injury, directly or indirectly caused, or directly or indirectly contributed to, by the excessive or inappropriate consumption of alcohol; and*
>
> *(b) any harm to society generally or the community, directly or indirectly caused, or directly or indirectly contributed to, by any crime, damage, death, disease, disorderly behaviour, illness, or injury of a kind described in paragraph (a).*

As this definition shows, harm can include direct or indirect harm to others, the community, and society more generally.

Reference to "harm" and its definition in the object of the Act is important, as before the 2023 Amendment Act removed the requirement for a Provisional LAP (PLAP), the only ground on which to appeal an element of a PLAP was that it was *unreasonable in light of the object of the Act* (section 81(4) of the Act before amendment)[35].

Section 4(1) of the Act had been interpreted as having two limbs, (a) and (b)[36]. However, the Supreme Court decision on the Auckland Council PLAP[37] provides a clear statement that the sections should be read together as:

> *... the objects of safe and responsible "sale, supply, and consumption of alcohol" and minimisation of "the harm caused by the excessive or inappropriate consumption of alcohol" referred to in s 4(1)(a) and (b) are not opposites to be balanced against each other. Rather they pull in the same direction. This is because supply and sale of alcohol that is safe and responsible will tend to minimise alcohol-related harm*[38].

The Supreme Court continues by stating that "a precautionary approach is open and that, in any event, a restriction may be justified on the basis of there being a reasonable likelihood that it will reduce alcohol-related harm"[39]. Decisions by DLCs and ARLA on licence applications have similarly emphasised that the equivalent of the precautionary principle in environmental law may be applied[40], and that "the factors to be considered in the course of assessing an application for a licence or for renewal, ... stand to be assessed in terms of their potential impact upon the prospective risk of alcohol-related harm"[41].

Local alcohol policies

The Sale and Supply of Alcohol Act 2012 came into force on 18 December 2012. One of the key drivers behind the new Act was an increased focus on local decision-making[42]. This is reflected in one of the five priority objectives of the new alcohol reforms being to *improve community input into local alcohol licensing decisions*[43]. Through LAPs, communities have the opportunity to have their say on the direction of licensing matters, as the LAP can tailor national provisions to local circumstances[44].

LAPs are a key method of supporting the object of the Act and can address issues that are of particular concern to communities and agencies (Police, Justice, Health, Local Government and others), including trading hours, proximity to "sensitive facilities" such as schools, and the proliferation and clustering of outlets in certain locations. Importantly, 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.

Weight in decision-making

A LAP has standing under the Act and requires the DLC and ARLA to have regard to any relevant LAP in licensing decisions (section 105 of the Act). However, it should be noted that the requirement of "having regard to" is considered subordinate to stronger obligations that exist in statutes such as the requirement by decision-makers to "have particular regard to", or "take into account" or "recognise and provide for" or "give effect to".

That said, since the passing of the 2023 Amendment Act, a DLC and ARLA may now also consider any inconsistency between a LAP and a renewal of the licence (section 133). This means that, for example, an application for renewal of an alcohol licence may be declined if it is inconsistent with those policies in a LAP that relate to the location of licensed premises and the issuing of further licences (section 77(1)(a) to (d)). Conditions may also be imposed on any renewal of a licence if it is considered that without those conditions, the renewal would be inconsistent with a LAP. The aim of the amendment is to improve the effectiveness of LAPs, as it is considered that decisions will now be more likely to reflect communities' intentions for alcohol licensing with regard to both new licence applications and those businesses seeking a renewal.

Types of licences

Under the Act, a TA may have a LAP relating to the sale, supply or consumption of alcohol within its district that relate to the four licence types permitted under the Act, namely:

- *On-licences*, that allows the sale or supply of alcohol for consumption on the premises such as bars, pubs, taverns, hotels, restaurants, (including BYO), cafes, entertainment venues, planes and caterers.
- *Off-licences*, that allows the sale or supply of alcohol for consumption off the premises or for sale for delivery or sales at a distance or direct delivery and samples on site. Holders of an off-licence include bottle stores (including within taverns), supermarkets, grocery stores, wine growers[45] and auctioneers.
- *Club licences*, that allows the sale of alcohol to authorised customers of the club who are on the premises (section 60 of the Act), such as sports and other recreational clubs. Clubs with a "permanent charter"[46] are not subject to licensing under the Sale and Supply of Alcohol Act 2012 and are not covered by the provisions in a LAP, including trading hours.
- *Special licences*, that allows the sale or supply of alcohol at an event or series of events or consumed at another place (also free samples). Only some LAP policies apply to special licences, i.e. sections 77(1)(e)-(g) relating to trading hours, discretionary conditions, and one-way door restrictions (section 77(2) of the Act).

Areas covered

A LAP should reflect the object of the Act and:

(a) may provide differently for different parts of its district; and

(b) may apply to only part (or 2 or more parts) of its district; and

(c) may apply differently to premises for which licences of different kinds are held or have been applied for (section 75 of the Act).

Although a mandatory LAP had been recommended by the Law Commission review[47], the Act clearly states that "no territorial authority is required to have a local alcohol policy" (section 75(4) of the Act). However, two or more TAs may adopt a single joint LAP that covers all their districts or parts thereof (section 76 of the Act and clause 16 of the Regulations). At the time of writing, 18 TAs have developed joint LAPs, with three of these now having their own separate LAP (Gore District Council 2020[48], Tauranga City Council 2024[49] and Western Bay of Plenty District Council 2022[50]). Reasons given for a joint LAP include greater efficiencies, cost-sharing and enabling a broader approach geographically to alcohol issues, particularly for those TAs in adjoining districts.

Amendment to the Act

It is recognised that the approach of TAs in developing a LAP for their district may vary for a number of reasons, including council priorities, policy outcomes, resourcing and capacity, and the knowledge that developing a LAP can be a lengthy and costly process = particularly before the passing of the 2023 Amendment Act.

Before the 2023 Amendment Act came into force, LAPs were developed in a two-stage process, both steps requiring public consultation. At the second stage, where the LAP was "provisional" ("PLAP"), those who made a submission on the draft LAP (the first stage), as well as the Police and Medical Officer of Health, were able to appeal elements to the ARLA and the Courts. To date, 86% of PLAPs have been appealed by the supermarket duopoly (Woolworths and Foodstuffs) and 73% by bottle stores. As at July 2024, none of the TAs with the largest populations, namely, Auckland, Christchurch, Wellington and Hamilton, had a LAP in force. However, on 29 August 2024, Auckland Council's Governing Body voted to have the LAP come into force in two stages (16 September and 9 December 2024), and it is anticipated that the other metro cities will also progress the development of their LAPs.

With the repeal of sections 84 to 87 of the Act and clauses 18 and 19 of the Regulations, PLAPs are no longer a requirement and consequently the right to appeal these has also been removed, unless the appeal process had been commenced (and not discontinued) before the 2023 Amendment Act was in force (i.e. in train as at 30 August 2023).

The Process

Legal requirements

There is a prescribed process both in the Act (Part 2, Subpart 2) and in Part 2 of the Regulations that TAs must follow to develop a LAP. The minimum legal requirements are:

- develop a draft LAP in consultation with Police, Licensing Inspectors and Medical Officers of Health (section 78(4) of the Act);
- have regard to the matters set out in section 78(2) of the Act, including data on licensed premises in the district, the demography of people in (or visiting) the district, and the objectives and policies of the council's district plan;
- ensure that, while it can be more restrictive than a Council district plan, the LAP does not permit activities not allowed by the plan (section 93 of the Act);
- consult the community on the draft policy using the special consultative procedure in the Local Government Act 2002 (section 79(1) of the Act);
- give public notice of the finalised LAP (section 80 of the Act and clause 17 of the Regulations) via newspaper and TA's internet site;
- adopt the finalised LAP 30 days after it has been publicly notified (section 81 of the Act);
- set the date the LAP will come into force (section 90(1) of the Act), but this date must not be earlier than 3 months after the public notification of the finalised policy where there would be a change to maximum trading hours or the introduction or modification of a one-way door policy (section 90(6) of the Act);
- give licensees affected by the LAP's new or amended elements written notice of the relevant policies and their effect (section 90(5) of the Act);
- provide a copy of the LAP that is in force to ARLA (section 91 of the Act); and
- review the policy every six years (section 97 of the Act) but noting that the LAP does not automatically lapse if not renewed or replaced within the 6-year timeframe.

Under section 82 of the Act, a TA may discontinue the development of a LAP at any time before the LAP is adopted (i.e. 30 days after the date on which the adoption is publicly notified)[51]. A TA also has the option of recommencing the development of a LAP, but must consult (special consultative procedure) as if it was developing a new LAP, unless consultation was completed within six years before the LAP was discontinued (section 83 of the Act).

Contents of local alcohol policies

A "local alcohol policy" is broadly defined in the Act, but in fact only covers licensing matters, and exclusively those listed in section 77(1) of the Act:

5. *Location of licensed premises by reference to broad areas,* enabling TAs to restrict licensed premises (on, off and club licences) to a particular "broad area", such as a commercial or special purpose zone or entertainment precinct, first having regard to the district plan and its objectives and policies (section 78(2)(a) of the Act).
6. *Location of licensed premises by reference to proximity to premises of a particular kind or kinds,* enabling TAs to address the harm arising from the clustering of licensed premises (on, off and club licences) by restricting the proximity between licensed premises of the same kind.
7. *Location of licensed premises by reference to proximity to facilities of a particular kind or kinds,* enabling TAs to prevent licensed premises (on, off and club licences) being located near identified facilities, namely "sensitive sites" such as educational facilities (schools and early childhood centres/kōhanga reo), as well as marae, places of worship, parks, and community and health facilities.
8. *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,* enabling TAs to consider whether further licences (on, off and club licences) should be issued for licensed premises, or whether there should be a cap/maximum limit or sinking lid policy to halt or reduce the existing numbers of outlets, particularly in areas where licensed premises have reached saturation levels.
9. *Maximum trading hours,* enabling TAs to set trading hours that meet the needs and characteristics of the district and its communities, rather than using the default national maximum trading hours in section 43 of the Act.
10. *The issue of licences, or licences of a particular kind or kinds, subject to discretionary conditions* that the District Licensing Committee (DLC) or ARLA may impose on a licence that are reasonable and would promote the object of the Act.
11. *One-way door restrictions* (also known as "lockouts" or "last entry" policies), enabling a condition to be imposed on a licence that allows people to leave places such as bars, taverns, pubs and nightclubs but not enter or re-enter after a certain time.

Collecting data to inform and monitor local alcohol policies

The Law Commission recommended that TAs should collect data so that changes in the nature and extent of alcohol-related harm in the area can be monitored and evaluated (Recommendation 131). The Commission also recommended that there should be a statutory duty on DLCs, Police and health authorities to collaborate in the enforcement of alcohol licensing (Recommendation 128), and that a nationwide shared information system on alcohol licensing should be developed (Recommendation 130). This, it was said, should assist in addressing some of the problems with ineffective monitoring and enforcement of the legislation.[52] [53]

TAs gather information on licensing through the various roles (DLC, Licensing Inspectors, policy, bylaw making, community engagement and other). When developing a LAP, there is a requirement that TAs must have regard to the following information listed in section 78(2) of the Act:

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.

Most TAs have produced a "research report" with this information that guides both the drafting and review of the LAP and is also of use for licence hearings and can provide baseline data. In preparing the draft LAP, TAs must consult with the Police, Licensing Inspectors and Medical Officers of Health who have the regulatory role under the Act and can provide relevant information to inform the development of the LAP (section 78(4) of the Act).

Although issues can arise when evaluating LAPs and collecting suitable and accurate data, collaborative work across a range of government sectors, including Health, Justice, Police and Social Development can help with information sharing, as does alignment to national strategies and frameworks (such as the National Alcohol Harm Minimisation Framework[54]), and accessing research databases such as the IDI (Integrated Data Infrastructure)[55]. Information collected as local government makes or reviews an alcohol control bylaw can also be utilised.

Indicators presented in TA research reports that accompany their draft LAP typically include:

- emergency department presentations involving alcohol;
- hospital admissions due to alcohol;
- Police data, including alcohol-related offences (e.g. violent offending), alcohol control bylaw breaches, monitoring of premises and incidents involving Police custody;
- vehicle crash data and drink drive convictions;
- alcohol consumption survey data; and
- community member surveys of perceptions of alcohol and safety and public attitudes to alcohol control measures.

Some TAs have set out how the LAP will be monitored and evaluated. This information is in Research Reports (section 78(2) of the Act) or in the LAP itself. For example, Whanganui's LAP 2019[56] has included a table with indicators that provide measures for evaluating the LAP's success in achieving its stated objectives.

Consultation

In 2012, the Act heralded a new approach to alcohol regulation. It was acknowledged that many of the necessary changes to New Zealand's drinking culture must flow from the community itself, not the law, and that communities needed greater control over alcohol availability.

The Law Commission recognised the need to involve communities "given the importance of alcohol issues to the community and because the LAPs will have some bearing on licence decision-making"[57]. The Commission recommended that "in preparing the proposed policy, councils should consult with local iwi and hapū, Police, Licensing Inspectors, Medical Officers of Health, and any other persons they consider appropriate" (Recommendation 5). The Commission further recommended that "public consultation on the proposed policy should be undertaken pursuant to the special consultative procedure under section 83 of the Local Government Act 2002" (Recommendation 6).[58]

As noted earlier, the Alcohol Reform Bill that followed (enacted as the Sale and Supply of Alcohol Act 2012) placed a special emphasis on community preference[59]. LAPs were intended as one method for communities to have a greater say on local alcohol availability. This is emphasised in the Supreme Court decision on Auckland Council's PLAP:

> *Policies that are implemented by a local alcohol policy can be based on, or at least influenced by, community preference...To that extent, ... such decisions do not have to be evidence-based. And more generally, the policies in a provisional local alcohol policy reflect policy choices of an elected territorial authority influenced by the preferences of its community.*[60]

Special consultative procedure

As noted above, as part of developing a LAP, TAs must follow the specific requirements for public consultation set out in section 83 of the Local Government Act 2002 (LGA). This form of consultation is usually required for matters of high significance for the public[61] and has the following steps that must be followed:

- prepare and adopt a Statement of Proposal that may include a Summary of Information;
- publish a public notice with the information and a call for submissions;
- receive submissions (written and oral);
- deliberate in public; and
- notify the decision.

In addition to the specific process for making and consulting on a LAP, TAs must also follow general rules on engagement/consultation set out in the LGA and case law. These rules relate to the purpose of local government (section 10 LGA), the principles that govern its actions (section 14 LGA), particularly the Treaty relationship with Māori, and the obligations of local authorities regarding consultation (Part 6 LGA)[62].

To guide the process, every local authority must have a Significance and Engagement Policy (section 76AA LGA) that sets out the approach to determining the significance of proposals, how the local authority will engage with communities and tāngata whenua[63], and the form of consultation that may be desirable (including consideration of "Diversity and Inclusion" and language assistance). TAs can, and have, referenced LAPs as a matter of significance that would trigger the Significance and Engagement Policy process[64].

Best practice consultation

Local government policies, processes and statutory requirements may guide consultation, but research has found that public participation in local alcohol licensing is low, and it has not increased substantially under the new legislation[65].

Mana whenua can be co-designers in the LAP process[66]. However, whānau/hapū/iwi/rōpū Māori should be adequately resourced to empower meaningful and effective participation (and, where appropriate, lead and have the senior authority) in decisions being made about alcohol in their communities to inform an understanding of the alcohol-related effects on Māori of policy decisions[67]. Knowing that it is essential to engage mana whenua and priority groups in the design of LAPs, some TAs have thought of innovative ways to consult the community on LAPs – at all stages.

The first step is to clarify "why" (to inform, consult, involve, collaborate, empower), "who" (target groups or general public) and "how" to consult.

A number of TAs have used the Act's section 78(2) information-gathering stage to consult the public and canvas their views by a variety of means, including:

- surveys
- brochures
- telephone calls
- face-to-face
- public meetings
- interactive websites ("have your say" etc)
- social media (e.g. Facebook/Meta)
- QR codes (e.g. Porirua City Council for the 2017 LAP[68] and Auckland Council for the draft LAP[69]).

Targeted consultation has also been conducted with groups such as licensees, industry groups, government services, TAs in neighbouring districts, alcohol accords (partnerships between key stakeholders/partners to promote community safety through safer alcohol consumption), local community groups, advocacy organisations, taxi drivers (e.g. in Whanganui for Whanganui District Council's 2019 LAP[70]) and tourism operators (e.g. in Rotorua for Rotorua Lakes Council's 2019 LAP[71]) amongst others.

Local alcohol policy or district planning

There are two key methods of controlling the location and hours of licensed premises:

a. through district plans under the Resource Management Act 1991; and
b. through a provision in a LAP that restricts the hours of operation and/or the location of premises (excluding special licences) in relation to:
    - broad areas (section 77(1)(a) of the Act);
    - premises of a particular kind (section 77(1)(b) of the Act); and/or
    - facilities of a particular kind (section 77(1)(c) of the Act).

The relationship between a district plan and a LAP is clarified in section 93 of the Act as:

1. A local alcohol policy may contain a policy more restrictive than the relevant plan
2. A local alcohol policy does not authorise anything forbidden by the relevant plan.

Furthermore, when drafting a LAP, a TA must have regard to the objectives and policies of the relevant district plan (section 78(2)(a) of the Act).

It has been argued by some supermarkets[72] and others that the district plan is the more appropriate mechanism for controlling the development of new licensed premises within broad areas, and for managing the effects of these businesses. However, while some TAs have restricted the location and trading hours of these activities through their district plan, others have no such restrictions, particularly those TAs that view the Resource Management Act 1991 as having a greater focus on environmental issues than alcohol licensing[73].

Controlling alcohol-related planning matters through (or by reference to) the district plan is appropriate, particularly when a number of TAs still do not have a LAP in place and developing and reviewing LAPs can be a lengthy process. However, as alcohol policies address social issues, it is considered important to also include permitted areas for certain types of premises in a LAP[74].

Section 77(1)(a) – location of licensed premises by reference to broad areas

Background

Through a LAP, TAs may restrict licensed premises to a particular "broad area", such as a commercial or special purpose zone or entertainment precinct, but as noted above, must first have regard to the district plan and its objectives and policies (section 78(2)(a) of the Act).

A number of 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. Although there can be issues with areas where there is an aggregation of licensed premises, such as bars and night-clubs in a particular area, a LAP can also include additional mechanisms that can reduce potentially negative effects. This might include one-way door restrictions or "lockouts" that can assist with crowd dispersion and migration between bars near the end of the night, and discretionary conditions that can be placed on licensed premises to control negative behaviours in these zones or precincts. Outside of a LAP, there are other tools such as alcohol control bylaws that create alcohol ban areas.

The evidence

Research is available on the utilisation of zoning rules to restrict the location, distribution, and density of licensed premises in the interests of promoting economic development, quality of life and public health. Studies examined cities where alcohol outlets were prohibited in residential neighbourhoods and where rules were imposed to limit over-concentration in commercial areas by preventing new stores from locating within a set distance of an existing licensed premise[75].

Research found that zoning policies would have greatest impact on the most deprived neighbourhoods that were estimated to experience reductions in violent crime[76]. The importance of engaging with communities and understanding the complex neighbourhood dynamics has been highlighted[77]. However, there is a lack of published outcome evaluations relevant to New Zealand to inform an understanding of the effectiveness of zoning changes on indicators of alcohol-related harm.

Examples

Current LAPs that have included a location provision have generally restricted licensed premises (or categories of licensed premises) to business/commercial zones/industrial zones: Wairarapa joint LAP[78] (Carterton, Masterton, South Wairarapa), Central Hawke's Bay[79], Horowhenua[80], Matamata-Piako[81], New Plymouth and Stratford joint LAP[82], Selwyn[83], Tasman[84], Waikato[85], Waimakariri[86], Waipā[87], and Waitomo[88].

It is important to note that current LAPs have largely been in place before the zoning categories were standardised following the implementation of the National Planning Standards gazetted in 2019 under the Resource Management Act 1991. District plan zones are now: residential, rural, commercial and mixed use, industrial, open space and recreation, coastal and special purpose.

Other areas outside of a business zone (or similar) include broad areas servicing local communities at a scale that would not compete with the main town centre. Such is the case in the Selwyn District[89], with new licences for stand-alone bottle stores also allowed in Neighbourhood and Local Centres as identified in the District Plan and the Rolleston and Lincoln Structure Plans.

The above mandatory locations clearly identify where relevant licensed premises can be established. It is less clear where a "broad areas" provision has been included in a LAP but simply refers to the DLC's discretion to decide or just refers back to the requirement to comply with the district plan[90]. Admittedly, these general statements do not provide details of specific locations, but they can indicate that a hand-in-glove relationship between district plans and LAPs is preferred by those TAs, rather than separate regulatory strands.

While a mandatory location requirement is relevant for many districts, some LAPs also contain discretionary provisions that may address neighbouring land use[91], or require the location of a licensed premises to be near a vineyard in a rural zone, or include restrictions on hours or numbers in certain locations (such as Flaxmere[92], Camberley[93], Naenae[94] and Invercargill Central Business District[95]) or near "sensitive sites". These location restrictions are addressed in the following sections of this guide.

Section 77(1)(b) – location of licensed premises by reference to proximity to premises of a particular kind or kinds

Background

TAs can address the harm arising from the clustering of premises through section 77(1)(b) of the Act by restricting the proximity between licensed premises of the same kind.

As noted earlier, when developing a LAP, a TA must first produce a draft policy (section 78 of the Act). From the information gathered for this work, TAs can consider whether applications for new licences should be restricted in a particular area by examining data such as number of on-, off- and club licences by number of adult residents, and alcohol outlet locations and socio-economic deprivation[96].

The evidence

The type of impacts arising from the clustering of licensed premises is likely to vary by type of licensed premises. The available evidence mainly pertains to the clustering of on-licences or off-licences, but limited evidence is also available to inform decisions relating to the clustering of club licences.

(a) On-licence clustering

Research covering Manukau, Auckland found that on-licences demonstrated clustering, typically in commercial areas with good transport links and high amenity value[97]. Clustering is believed to provide benefits to the licensee from spill-over effects, where consumers may move from one premises to another (e.g. bar hopping)[98].

Studies suggest that the environmental characteristics in and around bars, including staff organisation, intoxication of patrons and people remaining around bars after closing, can influence levels of violence on-site or nearby[99] [100] [101]. The propensity for customers to hang around after premises close may also contribute to an increased probability of violent incidents[102].

In other jurisdictions, notably Australia[103] and the United Kingdom[104], Cumulative Impact Policies (CIPs) have been developed in an effort to address problems associated with the clustering of on-licences, particularly those that trade late into the night. CIPs are used in decisions relating to a proposed premises entering an area that demonstrates existing clustering, and typically include criteria. However, research into CIPs has shown that they have focused heavily on addressing the amenity effects of outlet density through subtle changes in the local environment, with limited impact on reducing the actual clustering of premises[105].

(b) Off-licence clustering

The same research conducted in Manukau, Auckland found that off-licences were typically not gathered together in clusters. Rather, they were distributed throughout an area to reduce local competition. Where density of off-licences was high, research showed that this was associated with shorter travel distances to outlets, longer opening hours and price competition[106]. As the Law Commission reported, high density can promote lower prices through discounting and promotions to entice buyers to purchase in a saturated market[107].

Off-licence outlets and the areas surrounding them are also suggested to have the possibility to serve as de facto taverns in urban areas, where people buy alcohol and congregate for social interaction during consumption[108]. Whether this is more prevalent in areas of high outlet clustering is unknown but highlights the importance of alcohol bans and their enforcement.

Finally, it is important to recognise that a body of national and international evidence demonstrates the relationship between off-licence density and a range of alcohol-related harms[109 110 111 112]. It is thus possible that the clustering of off-licences contributes to the negative impact of overall density.

(c) Club licence density

Club licence density in New Zealand has also been shown to be significantly associated with higher levels of violence and a range of alcohol-related offences[113]. Further analyses show that their impacts on violence are greater in areas with low populations (e.g. rural areas and small towns)[114].

Examples

Some TAs have included a mandatory provision ensuring that no new off-licences are within 50 or 100 metres from another licensed premises (Hauraki[115] and Horowhenua[116]). Others have stated that the DLC will/shall "have regard to" the proximity of new licences where relevant (Matamata-Piako[117], Ōtorohanga [118], Waikato[119], Waipā[120] and Waitomo[121]), and indicate the distance between premises. 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... [122]

Section 77(1)(c) – location of licensed premises by reference to proximity to facilities of a particular kind or kinds

Background

Historically, licences were granted in New Zealand if they were "necessary and desirable" (see sections 74-75, Sale of Liquor Act 1962). Even when there was a community "need", licensed premises were not permitted close to a hospital, school or church.

Community concerns then and now, particularly in suburban locations, have focused on the proximity of licensed premises to each other and to community-sensitive facilities such as educational facilities (schools/kura kaupapa and early childhood centres/kōhanga reo), as well as parks and community and health facilities. Concerns are particularly focused on protecting vulnerable users of sensitive sites from exposure to alcohol outlets and the associated negative amenity effects. Protecting vulnerable populations and users of sensitive sites can also assist to address their disproportionate and inequitable exposure to alcohol and experience of alcohol harms.

One of the ways that alcohol-related harm can be minimised and vulnerable groups protected is to include a provision in a LAP restricting the proximity of alcohol premises to "sensitive facilities" (section 77(1)(c)).

The evidence

A minimum distance (typically between 100 and 180 metres) between places that sell alcohol and schools, churches, hospitals and playgrounds is mandated in some jurisdictions (particularly North America)[123] [124] [125] [126], and there are also examples of a similar approach in LAPs in New Zealand.

(a) Educational facilities

There are vast, as well as immediate and long-term, harms to young people from alcohol use. Children and adolescents experience more harm from their drinking than other age groups[127].

Adolescent alcohol use has been shown to be associated with the physical availability of alcohol around their homes and schools and tertiary institutions[128]. The limited mobility of young people means that the proximity of alcohol availability to their home and school may have a stronger effect compared to older age groups[129].

New Zealand studies have quantified children's exposure to alcohol marketing at off-licences and on-licences in their everyday lives[130] and measured the effect of outlets close to the young person's home[131]. While there is a lack of specific New Zealand research about the relationship between the proximity of alcohol outlets and schools and young people engaging in drinking, there are a number of international studies[132] [133] [134]. For example, a study in Perth, Australia of students aged 14 years found that having a bottle store within 800 metres of their school was significantly associated with them ever having partaken of an alcoholic drink. Having a bottle store within 800 metres of home or school (combined) was associated with ever having engaged in heavy drinking[135].

Proximity to alcohol outlets can present opportunities for under-age purchasing[136] [137] and consumption of alcohol. In New Zealand, young people who report being able to buy alcohol themselves or get someone else to buy it for them are much more likely to belong to higher-risk drinking groups[138]. Proximity (and density) of licensed premises may also impact young people via contributing to the perception of alcohol consumption as a normative behaviour[139] [140] [141] [142], and furthermore, broken bottles and alcohol-related litter found in nearby schools is likely to impact upon a young person's perception of the safety and amenity of their school.

(b) Addiction treatment facilities or hospitals

Every year in New Zealand it is estimated that 4% of the total adult population aged 16 and over experience alcohol abuse or dependence[143]. This comprises more than 100,000 New Zealanders.

Studies were identified in relation to the effects of the proximity of licensed premises on persons utilising alcohol treatment facilities, and, for example, found that among patients who were diagnosed with co-morbid mental health and substance use disorders, close proximity of two or more bottle and/or beer stores was associated with a reduction in the likelihood of continuity of treatment (i.e. attending outpatient treatment)[144] [145].

(c) Marae

The marae is a tapu or sacred place central to Māori values and philosophy, and in relation to health, enhances access to te ao Māori (the Māori world) by emphasising tikanga, whānau and a holistic approach to health, that may include help for alcohol issues[146] [147]. A number of TA research reports[148] and other research[149] (e.g. for Wai 2575[150] and Wai 2624[151]) found that there was a disproportionate number of alcohol outlets in close proximity to marae (and kōhanga reo and kura kauapa).

(d) Places of worship

As noted, historically, licensed premises were not permitted close to a church. This continues to be the case in a number of jurisdictions, particularly in North America, where the test is "immediate vicinity" or a set distance from a church or other place of worship[152]. With the change in demographics and greater diversity of the New Zealand population, there is an increasing number of other places of worship and spiritual significance that can also be considered "sensitive sites", such as mosques and temples.

(e) Parks, reserves and other community facilities

These sites are important to local residents and are where families and others typically undertake leisure activities[153]. Licensed premises in close proximity may contribute to the reduction of amenity of these areas as a result of alcohol-related litter and persons drinking in public spaces having purchased alcohol products nearby. Including parks as sensitive sites is likely to support alcohol control bylaws that have been put in place in these areas.

As with other types of sensitive sites, there are international examples where there is a legal requirement to have a separation distance from any site being used for community or recreation activities, or public lands[154].

Examples

Sensitive facilities

Community consultation has been used to determine local "sensitive facilities", the profile or vulnerability of users of those facilities, and reasonable distances from licensed premises. It is acknowledged that there can be difficulties in establishing a workable definition of "proximity", particularly given the relatively small size of many communities in New Zealand and the close proximity of sensitive sites to areas zoned for licensed activities. There may also be issues when setting a distance where the relevance of the proximity may be impacted upon by physical barriers, such as a river or motorway. Existing use rights of premises with current licences and "reverse sensitivity" arguments are also factors that have had to be considered when setting proximity restrictions.

Research undertaken as part of preparing a draft LAP (section 78 of the Act) has helped inform the process, as well as consultation with statutory agents (Police, Licensing Inspectors and Medical Officers of Health).

The 28 TAs that have included a LAP provision restricting the proximity of licensed premises to certain facilities (alternatively referred to as "sensitive facilities" or "sensitive sites") have all included places catering to children. This includes:

- educational facilities = primary and secondary schools/kura kaupapa[155], pre-school/kōhanga reo/early childhood education centres
- childcare facilities and Well Child/Tamariki Ora provider centres
- playgrounds
- parks
- carparks
- reserves
- community halls, and
- recreational facilities.

Twelve of the 28 TAs have also included places of worship, religious gathering/assembly and spiritual facilities[156], including urupa and cemeteries, and five LAPs include marae (Gisborne[157], Horowhenua[158], Rotorua[159], Wairoa[160] and Whanganui[161]).

Health care facilities (alcohol and drug treatment centres, hospitals and medical centres) have been included in the facilities listed by six TAs (Horowhenua[162], Porirua[163], New Plymouth[164], Stratford[165], Wairoa[166] and Whanganui[167]).

A broad category, "any residential activity" (residential area, dwelling or apartment), has been included in LAPs for six districts: Gore[168], Invercargill[169], Southland[170], Waikato (on-licences)[171], Waipā[172] and Waitomo[173]. By contrast, one LAP, Waikato[174], is specific about locations, and does not allow new off-licences for bottle stores at three urban locations (Te Kauwhata, Tuakau and Pōkeno) if these stores directly border a school, early childcare facility, place of worship or public park, unless it can be demonstrated that there will be no significant impact on those facilities or their users.

Eight TAs have included a discretionary condition in addition to a mandatory condition. Two (Gisborne[175] and Porirua[176]) have also generally noted that the DLC may determine facilities whose target users are considered more sensitive or vulnerable to harm than the public generally as an outcome from direct exposure (current or future) to premises that sell or supply alcohol. Six TAs have exempted supermarkets and grocery stores from these restrictions (Hauraki[177], New Plymouth[178], Stratford[179], Porirua[180], Wairoa[181] and Whanganui[182]). Ruapehu District Council[183] has included a definition of "sensitive sites" (educational institution, government department, community facility, and train and bus station), but then states that the policy does not restrict the location of licensed premises in relation to sensitive sites (clause 5.2.8).

Distance from licensed premises to facility

TAs that want to ensure that licensed premises are distanced from sensitive facilities either restrict new licences from areas that "directly border" or are in "close proximity" to sensitive facilities or include a measurement between these sites. TAs that prohibit new licences for premises that "directly border" facilities have included a diagram to illustrate this in their LAP (Wairarapa LAP[184] covering Carterton, Masterton, South Wairarapa Districts, Ōtorohanga[185], Waikato[186], Waipā[187] and Waitomo[188]). Other LAPs include a distance, typically from the boundary or main façade, ranging from 40 to 200 metres (Rotorua Lakes[189] for premises outside the inner city).

Types of licences

Restrictions on on-licences were the most common (33 districts), often specifying the type of premises (hotels, taverns, bars, night-clubs). Twenty-seven TAs had restrictions on off- licences, with five specifying bottle stores. Clubs were also subject to proximity rules, but mostly in general provisions.

Section 77(1)(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

Background

Section 77(1)(d) of the Act enables TAs to consider whether further licences should be issued for licensed premises, or whether there should be a cap/maximum limit or sinking lid policy to halt or reduce the existing numbers of outlets, particularly in areas where licensed premises have reached saturation levels.

A cap on the number of licences at the time of policy adoption would mean that the current number of outlets remain for a certain period of time. New outlets may only be applied for if current outlets close or are shut down. Alternatively, an upper limit on the number of licences could be prescribed to take into account population growth, or a rebuttable presumption imposed against the issuing of new licences in certain areas. In contrast, a sinking lid policy is designed to gradually reduce the number of premises by prohibiting the transfer of licences, an example being sinking lid policies under the Gambling Act 2003[190].

Generally, a district-wide cap on all licensed premises is considered ideal, with the possibility of a localised sinking lid option for high-risk/high-stress areas within the districts (i.e. those areas that have high numbers of alcohol outlets already, large proportions of vulnerable populations such as young people, Māori and Pacific peoples, low income communities in the areas surrounding a premises). However, it has been acknowledged that district/local issues would determine the approach.

A cap on all licensed premises would, for example, apply to all off-licences and include supermarkets (where the majority of the cheapest beers, wines and ciders are sold) and other off-licensed businesses alike.

The evidence

Consultation conducted by the Law Commission revealed "strong support for halting the proliferation of licences – particularly off-licences". The most common reasons given for reducing licence numbers were that bottle stores had a significant impact on low socio-economic and vulnerable communities, that the proliferation of small suburban outlets had facilitated supply to young people, and that there were negative impacts on the amenity values of neighbourhoods including increased rates of offending, vandalism, and disorderly and offensive behaviour[191] [192]. This is clearly demonstrated in South Auckland where there are proportionately more off-licences (30%) compared with Aotearoa (24%) and a corresponding high level of alcohol-related harm[193].

As noted throughout this guide, New Zealand and international research demonstrates a relationship between the accessibility of alcohol and alcohol-related harm. [194] [195] [196] [197] It follows that an increase in the number of licensed premises makes alcohol more accessible (e.g. each new store makes someone closer to an alcohol outlet), and it is hypothesised that (other things being equal) this increases consumption and alcohol-related problems. Each new premises potentially increases the competitive pressures on existing businesses, which may result in price reductions which tend to lead to increased levels of consumption[198] [199] [200], and the more licensed premises, the greater the possibility of exposure to alcohol marketing and influence on local social norms relating to alcohol use[201]. There are also impacts on amenity arising from the negative effects of licensed premises in local and adjacent areas, including violence and street disturbances[202].

New Zealand studies also show that harms from alcohol availability extend beyond the immediate area of the licensed premises. Harms have been investigated at 1 kilometre, 3 kilometres, and up to 4.5 kilometres from premises, in addition to within the census area unit and (weighted by distance) neighbouring/surrounding areas[203] [204] [205] [206] [207] [208] [209]. Stronger negative effects are generally shown at 1 kilometre, but have also been shown to extend to 3 kilometres and 4.5 kilometres[210]. This means that density in one census area unit can play a role in the level of alcohol-related harm experienced by residents in neighbouring areas, over and above the number of outlets within their own geographic boundaries.

It is certainly clear that the more licensed premises in a community, the higher the level of harm[211] [212] in that area with the potential to spill over to neighbouring areas. Drinkers living in deprived communities have higher levels of hazardous drinking[213] and are likely to experience more harm from their drinking compared to advantaged communities with the same level of drinking[214]. Reducing the proliferation of licensed premises is a key alcohol control measure to reduce harm.

Examples

To address the problems associated with the proliferation of licensed premises, communities and agencies have advocated for a cap on the number of alcohol licences granted[215]. However, there are a number of options to consider when deciding on a cap or sinking lid or other measures:

i. a cap on a per capita basis;

ii. a cap based on the number of licensed premises within a defined area;

iii. a cap only on certain licensed premises (e.g. bottle stores);

iv. a sinking lid where there is a limit on licences in an area or district that is permanently lowered with each reduction in licence; or

v. a blanket ban on new licences anywhere in the district.

Sinking lid approaches require consideration. While it is desirable to reduce the existing saturation of licences, ideally it would also be beneficial to select which licences were removed rather than the remaining outlets simply existing as a result of attrition. For example, as sales volume from off-licences is a strong predictor of alcohol-related violence[216], it would be preferable that larger outlets were first removed in any sinking lid approach. It would also be a problem if the outlets that remained in a sinking lid approach had the highest rate of non-compliance with alcohol regulations.

In 2013, the Hauraki District Council's draft LAP proposed a sinking lid policy, where no more off-licences would be issued in the urban area of Paeroa or Waihi until there were four or fewer off-licences in each town. For Ngatea, the lid would rest at two. The proposed sinking lid would not apply to supermarkets with a floor area of at least 1,000 square metres. This measure was omitted in the final LAP and carried through to the 2022 LAP that now states:

> *4.3.1. There is a presumption that new licences will not be issued in Paeroa, Ngatea and Waihi if, in the opinion of the District Licensing Committee, the amenity and good order of the locality would be likely to be reduced to more than a minor extent by the effects of the issue of the licence.*[217]

The location and numbers of alcohol outlets can not only be controlled by a cap on further licences or "sinking lid" policy, but can also be managed through LAPs by policies on:

a. broad areas (section 77(1)(a) of the Act);

b. proximity to other licensed premises (section 77(1)(b) of the Act); and

c. proximity to sensitive facilities (section 77(1)(c) of the Act).

These controls may overlap somewhat, but most TAs have utilised the range of policies, and have restricted new licences to certain "broad areas" or zones (e.g. business or commercial zones), or restricted the location to areas distant from other licensed premises or sensitive sites. A number of TAs have also capped the number of off-licences in their district or part of the district.

Caps in some districts such as Hutt City, Waikato and other districts are clearly identified, and limit off-licence premises to maximum numbers in specific areas such as:

- Hutt City[218]: Naenae (four), Stokes Valley (three), Taitā (three), Avalon (one), Hutt Central (11) and Wainuiomata (six);
- Waikato District[219]: Ngāruawāhia (two bottle stores), Huntly (three bottle stores) and Raglan (two bottle stores); and
- Whanganui District[220] (14).

There is also a rebuttable presumption against new off-licences in:

- Hauraki District[221]: Paeroa, Ngatea and Waihi;
- Matamata-Piako District[222]; and specifically, against bottle stores in:
- Napier City[223]: Maraenui (suburb)
- Hastings City:[224] Camberley (suburb), Flaxmere (township),
- Western Bay of Plenty District[225]: Te Puke-Maketu Ward.

In other areas, new off-licences have either been capped at the number at the date of the LAP (e.g. bottle stores in New Plymouth and Stratford[226]) or are generally prohibited in some areas. Some TAs have applied a mix of approaches, such as Horowhenua[227] where off-licences are only permitted in the commercial zone and bottle stores are not permitted within 100 metres of a sensitive facility. However, there is also a temporary cap for two years (or until the LAP is reviewed) on the total number of bottle stores in each town or township in the district. Wairoa[228] has a district-wide cap (10 off-licences), with the off-licences capped at six for the urban zone.

Restrictions are heavily focused on bottle stores, with a lack of protections in policies relevant to supermarkets and grocery stores. Exemptions have been allowed for supermarkets and grocery stores in some areas (Horowhenua[229] and Whanganui[230]) and supermarkets alone are exempt in Wairoa[231]. New off-licences may also be granted in certain cases, namely, if a business is relocating (Horowhenua[232]) or if it can be demonstrated that active steps have been taken to minimise harm (New Plymouth-Stratford[233]).

Policies on capping licences can be for a limited period (two years in Horowhenua[234]) and are reviewed periodically, either when the LAP is reviewed within six years of adoption or more frequently (e.g. every two years in Whanganui[235]).

Auckland Council's LAP[236] provides an example of what can be covered = and the appeals process that could ensue with a PLAP before the passage of the 2023 Amendment Act. This LAP included a temporary freeze on new off-licences in certain areas for the first 24 months of the LAP being in force, and a presumption that new licences will be refused thereafter unless the DLC or ARLA is satisfied that the applicant has rebutted the presumption. These provisions were to control the density and proliferation of off-licences in certain parts of Auckland where there are higher levels of alcohol-related harm.

Section 77(1)(e) – maximum trading hours

Background

Section 77(1)(e) of the Act enables TAs to have a policy on trading hours as one of the matters that may be included in a LAP. This means that rather than using the default national maximum trading hours that the Act imposes in section 43 (8 am to 4 am for on-licences and club licences; 7 am to 11 pm for off-licences), TAs can set trading hours in a LAP to meet the needs and characteristics of the district and its communities (section 45 of the Act).

Hours can be set by area or community-by-community, or TAs can adopt an area-wide policy[237]. Hours apply to both new licences and existing licences, but if the LAP changes the trading hours, that policy can only take effect three months after the public notice of adoption of the LAP (section 90(6) of the Act)[238]. Permitted trading hours do not apply to hotel mini-bars (section 46 of the Act) or remote sales (section 49 of the Act), with exceptions for delivery on sacrosanct days (section 48 of the Act) and between 11pm and 6am (section 59(1) of the Act).

Where a LAP does not specify hours, the default national maximum trading hours in the Act apply[239]. However, the DLC or ARLA have a discretion to set more restrictive hours than those in the Act (section 43 of the Act) or those set out in a LAP, but must first have regard to any relevant LAP. The DLC or ARLA must also ensure that the licence conditions state the days and hours when alcohol may be:

a. sold and supplied: on-licences and club licences (section 110(2) of the Act); or

b. sold and delivered: off-licences (section 116(2) of the Act), special licences (section 147(3) of the Act).

On-licence and club licence trading hours

The Law Commission in its 2010 report recommended mandatory maximum trading hours for on-licences and clubs. Venues would be required to operate no earlier than 9 am and no later than 4 am. The Commission reasoned that a 4 am closing, in association with mandatory one-way door conditions from 2 am and the earlier closure of off-licences and clubs, should reduce the incidence of serious crime that often occurs after 4 am due to people's higher levels of intoxication[240].

The Commission's recommendations were partly acted on, as the default closing time is 4 am, but premises may open at the earlier time of 8 am, and a one-way door policy from 2 am is not mandatory (one-way door policies are discussed under the section 77(1)(g) of the Act below). Royal New Zealand Returned Services' Association clubs also have relaxed restrictions on Anzac Day (section 47A of the Act), unlike on-licences (section 47 of the Act) and off-licences premises (section 48 of the Act)[241].

It should be noted that the mandatory trading hours in a LAP can be, and have been, overridden on occasion by amending the Act for specific events, such as the Rugby World Cup 2023[242], enabling on-licence and club licence holders to extend their trading hours without applying for a special licence.

Off-licence trading hours

The Law Commission's 2010 report also recommended that off-licence premises would not be permitted to sell alcohol until 9 am and not beyond 10 pm. The rationale for the 9 am opening hours was to reduce school-aged children's exposure and access to alcohol on the way to school.

However, the Government set the default opening time for off-licences at 7 am, the rational being that supermarkets and grocery stores, whose primary purpose is to sell food and can only sell beer, wine and mead (section 58 of the Act), would be able to open earlier than 9 am and display alcohol. Consequently, it was thought that there would be little reduction in young people's exposure to alcohol, while early morning shoppers would be inconvenienced with a later opening time. The closing time of 10 pm was also not accepted, with 11 pm set as the default in the Act to accommodate later night shoppers[243].

Special licence trading hours

In 2010, the Law Commission noted that there would only be a few occasions when on-licences would need to have later or earlier trading hours than the national maximum hours (e.g. special events relevant to international sporting games)[244]. In deciding whether to issue a special licence, the DLC must have regard to a number of matters, including the object of the Act, whether another licence or variation of licence would have been more appropriate (section 41 of the Act), and the days and hours during which the applicant proposes to sell alcohol (section 142(1)(f) of the Act). The DLC may refuse to grant a special licence if inconsistent with any relevant LAP (section 146 of the Act), and can impose conditions such as a one-way door condition (section 147(1)(k), section 110(1)(d) and section 77(1)(g) of the Act).

The evidence

On-licences

International and national studies have shown that hazardous drinking increases with longer hours and greater availability. A systematic review of studies examining on-licence trading hours provided evidence that extended trading hours at on-licence premises was typically followed by increases in the incidence of assault, unintentional injury or drink driving offences and that conversely, restricting trading hours was typically followed by decreases in the incidence of assault and hospitalisation[245 246].

In line with the I3 Model (or "Perfect Storm") that shows how multiple risk factors interrelate to aggravate the aggression-promoting tendencies of each, increased trading hours (that increases the amount of time alcohol can be consumed) as well as a person's level of fatigue can lower their ability to inhibit aggression particularly within night-time entertainment areas where there is a number of premises and higher number of intoxicated people in close proximity [247 248 249].

When 24-hour trading ended in 2012, the reduction in very late night trading hours was found to be associated with a reduction in weekend hospitalised assaults (declined by 11%), with the greatest reduction among 15 to 29-year-olds (18%)[250 251 252]. However, while there is the ability to reduce trading hours through a LAP, this (according to one study) has not led to a significant change in crime in New Zealand[253]. The authors of the study noted that the failure to identify significant reductions in crime may partly reflect the lack of meaningful reductions in trading hours, as in many instances the adopted LAP trading hours reflected the status quo. This meant that, in many cities and districts, most on-licences were unaffected by the trading hours in the adopted LAP.

Off-licences

As noted earlier, alcohol is no ordinary commodity[254], but it is easily accessible given the number and location of outlets – and long trading hours. Off-licences premises sell over 80% of all alcohol in New Zealand[255], with supermarket and grocery store market share approximately 60% and 30% of all off-licence wine and beer sales, respectively[256 257]. This means that most alcohol is purchased (often cheaply) from premises such as supermarkets and grocery stores[258] that are easy to access and consumed in situations where there may be little control or supervision[259].

As already indicated, reducing trading hours for off-licences is a key strategy for reducing alcohol-related harms[260]. Shorter trading hours for off-licences compared to on-licences could help to reduce opportunities for "pre-loading" (i.e. drinking before attending a licensed venue) or "post-loading" (i.e. also known as backloading where drinking occurs after attending a venue) or "side-loading" (i.e. drinking while travelling between venues). This occurs by decreasing the chance that people purchase further alcohol once they are already intoxicated or influenced by alcohol[261].

New Zealand research has shown that the purchase of alcohol from an off-licence premises after 10 pm was approximately twice as likely to be made by heavier drinkers[262]. As with research on on-licence trading hours referred to above, the end to 24-hour trading in 2012 was associated with a reduction in the number of assaults, particularly among 15 to 29-year-olds[263], and the authors of the 2020 study suggest that further reductions in off-licence trading hours could provide many more benefits[264]. This is clearly evident from international research[265 266 267 268 269 270 271], although there is a lack of available research on the relationship between the opening hour of off-licences in New Zealand and alcohol-related harm.

Club licences

Club licences, in particular those held by sports clubs, have been shown in research to contribute to the risky drinking behaviours of participants at the club[272]. For example, analysis of Pacific youth drinking patterns in New Zealand found that participation in a sports team or club outside of school was independently associated with an increased risk of binge drinking[273]. However, no studies were located on the association between club licence trading hours and alcohol- related harm.

Special licences

A wide variety of events will require a special licence, making it hard to evaluate the effect of maximum trading hours for different drinking contexts. That said, as previously described, the longer the trading hours the higher the likelihood of increased consumption and intoxication.

Examples

On-licences

A 4 am default closing time was not always considered appropriate or safe in some locations[274]. Thus, after researching options and public consultation, most TAs have imposed shorter on-licence (and club) trading hours in their LAP, with closing times usually one or two hours before the national default of 4 am.

Only one of the LAPs currently in force has the same closing hours as the maximum default of 4 am, namely Dunedin City's LAP[275] with a 4 am closing time for entertainment premises in non-residential areas (but with a 2:30 am one-way door restriction).

All TAs with LAPs have restricted trading hours in some way, particularly if adjacent/ near residential areas where significantly reduced closing hours are either mandatory (e.g. Waipā[276], Waitomo[277] and Dunedin[278] LAPs) or discretionary (e.g. Waimakariri LAP[279]). A distinction between premises is also typical, with, for example, taverns having later closing hours than restaurants and cafés.

While closing hours are, by and large, less than the maximum default hours (subject to DLC/ ARLA conditions), opening hours are generally the same as the default hour of 8 am (20 TAs) or one hour earlier at 7 am (11 TAs) or later at 9 am (10 TAs.

Notably, Hutt City LAP[280] provides for a probationary period for new on-licence premises in certain locations. New taverns, hotels, nightclubs and function centres in Lower Hutt Central Business District and Jackson Street, Petone, must close at 1 am for one year, but after this time may extend their licences to 3 am closing if they meet all the "suitability criteria" in section 105 of the Act.

Off-licences

Most TAs have restricted hours for off-licences. Only five LAPs have the maximum default closing time of 11 pm (Central Hawke's Bay[281], Gore[282], Invercargill[283], Southland[284] and Whakatāne[285]), whereas seven LAPs have later opening hours than the maximum default – 8 am (Kawerau[286], Kaikōura[287]), 9 am (Ruapehu[288], Central Hawke's Bay[289], Napier-Hastings[290]) and 10 am (Wairoa[291]).

Although studies have found that the relationship between supermarkets and grocery stores and alcohol-related harm is generally the same as the relationship between other off-licences (e.g. bottle stores) and alcohol harm[292] (and in fact, it is often easier to access alcohol products from these off-licences), supermarkets and grocery stores have been treated differently in a number of LAPs – in proximity rules and in trading hours. For example, Napier-Hastings joint LAP[293] and Ruapehu[294] allow supermarkets and grocery stores to open two hours earlier at 7 am than other off-licence premises in their districts (9 am).

Club licences

Most clubs have the maximum default of 8 am for opening hours, but six have extended this to an earlier permitted time of 7 am (Matamata-Piako[295], Hauraki[296], Selwyn[297], Thames-Coromandel[298], Waimakariri[299] and Whakatāne[300]). A number of clubs are permitted to open earlier for a specific reason[301] with, for example, eight LAPs including an earlier opening time on Anzac Day (4 am, 5 am or 6 am).

Nearly all LAPs have restricted closing hours for club licences, and those that don't either do not include provisions for club licences (e.g. Hutt City[302]) or have hours set on a discretionary/case-by-case basis (e.g. Ashburton[303], Wairarapa LAP[304] for Carterton, Masterton and South Wairarapa Districts). The Invercargill City-Southland District Councils' LAP[305] has the latest closing time with a 3 am closing, but with the proviso that applications will need to justify the hours requested on the basis of the activity of the club.

Special licences

Most TAs have not included set hours in their LAPs, and have either not mentioned hours for special licences (11 districts) or have noted that decisions are discretionary or on a case-by-case basis (14 districts). Three TAs have required that hours are the same as any existing licence (on-licence or club licence). Fourteen TAs have included mandatory maximum hours, with three TAs referring to hours (without being specific) under the general discretionary conditions heading. One TA has simply stated that "special licence hours granted will not exceed the maximum hours allowed for under the Act" (Whanganui[306]). Gisborne[307] District Council's 2018 LAP provides an example of a special licence policy:

> ***3.3 Special Licences***
>
> *3.3.1 Non-licensed premises will not be issued a Special Licence beyond 2 am.*
>
> *3.3.2 Licensed premises applying for a Special Licence will not be permitted to operate beyond 3 am.*
>
> *3.3.3 All Class 1 Special Licences shall be exercised by a person holding a Manager's Certificate under the Act.*
>
> *3.3.4 Any special licence for a series of events should not be for a period exceeding six months.*
>
> *3.3.5 No premises should have more than 20 events under special licence in any 12-month period.*

The Kaikōura District LAP states that "a maximum of 26 on-site and off-site special licences or on-site and off-site special licences covering 26 events (whichever is the lesser) will be issued per year (July-June) per premises"[308]. For trading hours, an on-site special licence is to specify a closing time of no more than two hours later than permitted by the current on-licence.

The Wairoa LAP[309] provides specific protection for children in relation to the granting of special licences. The LAP states:

> *Licences will not be granted for child-focussed events. A child focussed event is an event that is centred around minors. This includes but is not limited to galas, children's sports games, school kapa haka events, etc.*

Section 77(1)(f) – the issue of licences, or licences of a particular kind or kinds, subject to discretionary conditions

Background

The Act allows a DLC or ARLA the discretion to apply a reasonable condition on any licence that would promote the object of the Act. Discretionary conditions that may be imposed include:

- one-way door restrictions on on-licences and club licences (section 110(1)(d) of the Act);
- designated areas to which minors must not be admitted (section 119(2) of the Act); and
- the people to whom alcohol may be sold or supplied and the kind of alcohol that may be sold from off-licences (section 116 of the Act).

Section 117 of the Act also gives a DLC and ARLA the general mandate to issue a licence subject to any reasonable condition that is not inconsistent with the Act. This might include conditions that reflect the principles of Crime Prevention Through Environmental Design (CPTED)[310] [311], and host responsibility, or impose more restrictive conditions where a licence is granted for the first time.

TAs can include policies on discretionary conditions in their LAPs (section 77(1)(f) of the Act), and the DLC and ARLA must have regard to these conditions when deciding the conditions to be imposed on a particular licence. Inclusion of discretionary conditions in a LAP can strengthen the mandatory elements and provide guidance to the DLC and ARLA when deciding which licence conditions are appropriate. Matters that could be included as discretionary conditions in a LAP include restrictions on the sale of single alcoholic beverages (known as single sales), "buy now pay later" arrangements, and restrictions on alcohol-related signage or advertising covering the external area of the licensed premises. These conditions are described below.

Single sales

The evidence

As it has been noted throughout this guide, alcohol-related harm increases where alcohol is easily accessible, and this includes where businesses are conducted in such a way that impulsive alcohol purchases are encouraged, and where the price is affordable[312].

Purchasing single cans or bottles of beer (craft beer normally exempt), cider or Ready-To- Drinks (RTDs) is more affordable than the cost of a pack[313]. This practice is likely to be favoured by those who are looking to consume alcohol immediately and are heavy drinkers, namely, adolescents and young adults and those with an alcohol dependence.

International research has documented the association between single sales and alcohol-related violence and crime[314], and, for example, an intervention to reduce single sales was found to reduce rates of alcohol-related ambulance attendances among 15 to 24-year-olds[315]. Restrictions on single sales can also greatly assist compliance with alcohol control bylaws and may reduce pre-loading or side-loading surrounding licensed premises.

Some off-licence retailers have argued, however, that single sales should be allowed where the businesses need to recover the cost of broken packages, and that such sales from broken packages were of service, for example, to those wishing to purchase minimum quantities such as visitors and tourists. Although issues with broken packages have been acknowledged in some DLC and ARLA decisions, it is usually with a condition that re-packaged goods must not be single sales and must be of a certain quantity (e.g. four or more units).

Examples

Conditions restricting single sales have been imposed by the DLC under its general mandate to issue a licence subject to any reasonable condition that would promote the object of the Act, including setting a minimum price[316] and volume of each bottle, can or container.[317]

A number of LAPs also include a discretionary condition that the DLC may impose to restrict single sales. For example:

i. Gore District Council's LAP[318] includes a discretionary condition *prohibiting 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*; and

ii. Whanganui District Council's LAP[319] 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*[320].

Other LAPs are more general, such as Kaikōura District Council's LAP[321] that refers to restrictions on the "type or quantity of alcohol sold".

The inclusion of a discretionary condition in a LAP on single sales provides guidance to the DLC, and aligns and reinforces decisions made by the DLC and ARLA that address availability and accessibility and the associated risk of alcohol-related harm.

Buy Now Pay Later

The evidence

Buy Now Pay Later (BNPL) schemes (such as "Afterpay", "Klarna", or similar) offer a type of short-term financing that allows consumers to make purchases and pay for them at a future date. BNPL is heavily promoted (often through influencer marketing) and generally less regulated as compared to other financing options. It has been criticized for encouraging impulse shopping and debt by those using the scheme[322]. 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 alcohol (and purchase more alcohol than planned) at a perceived lower price.

Example

Waikato District Council PLAP 2022 includes a discretionary condition in relation to off-licences and "whether 'buy now pay later' is an inappropriate method of payment for the sale and supply of alcohol purchased either remotely or on premises."[323]

Signage/advertising

The evidence

The effect of alcohol marketing on youth alcohol initiation and heavy drinking is established as causal[324]. Children and youth are exposed to alcohol marketing via a variety of means[325], such as store front posters and promotions in the myriad of off-licensed bottle stores in the most deprived areas. In New Zealand, there is evidence that alcohol advertising is prevalent in urban settings, with tamariki Māori and Pacific children disproportionately exposed[326 327].

Research also shows that heavy or problem drinkers can be more responsive to alcohol advertising and imagery, placing them at risk of triggering alcohol use in relapse and maintaining alcohol dependence[328 329].

Large obtrusive alcohol price advertisements and product branding on shop fronts, adjoining walls and sandwich boards is, as the Law Commission observed[330], 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 protections in the wider Act to protect communities from the known effects of exposure to alcohol advertising at licensed premises. Section 237 (irresponsible promotion) of the Act 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.

DLCs and ARLA have imposed conditions on a case-by-case basis. They have, for example, restricted signage to the store name and logo[331] or limited the area permitted for advertising alcohol-based products to 25% of the exterior of the premises[332], and ensured that outside the premises there will be no bright colours, flags, sandwich boards, and specific product or price specials displayed.

In Auckland, the DLC issued a Practice Note on 31 July 2023 to guide decision-making[333]. The Practice Note includes some criteria (with examples) of what is/is not acceptable external advertising outside or on the façade of off-licensed premises and a 25% façade limit. Auckland Council's Regulatory and Safety Committee has now resolved to endorse the Auckland DLC Practice Note, and the Committee also noted that "including discretionary conditions about alcohol advertising outside off-licence premises can be considered during the first statutory review of the Auckland Local Alcohol Policy, if and when it becomes operative."[334]

Examples

Most TAs have included conditions to address the harm from signage and advertising. Most of those LAPs that include reference to signage/advertising have a discretionary condition 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. Most LAPs include a reference CPTED and this guidance 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.*[335]

One LAP (Central Hawke's Bay[336]) also has a discretionary condition that covers advertising signs and sandwich boards on the footpath.

Although alcohol-related signage and advertising is not specifically listed as one of matters that can be included in a LAP (section 77(1) of the Act), it can be included as a discretionary condition, and it can be linked to other matters, such as mandatory proximity rules for sensitive facilities (section 77(1)(c) of the Act). In this case, new licences may be granted where it can be demonstrated that any alcohol-related signage (and hours/operation) will have no significant impact on these sites and the people using them.

Other discretionary conditions

Discretionary conditions in LAPs generally covered issues such as:

- staffing (training, security, duty managers),
- host responsibility (serving times, types, size and price of drinks, queue management),
- amenity and good order (signage, advertising, cleaning up),
- management of incidents (registers, etc) and
- utilisation of CPTED (CCTV, etc).

No LAPs were identified that included discretionary conditions relating to the availability and promotion of low alcohol (e.g. beverages containing no more than 2.5% ethanol by volume at 20°C) and zero alcohol products at off-licences, and specifically that there should be a sufficient range of these products available for purchase and clearly signalled to customers inside the store.

Section 77(1)(g) – one-way door restrictions

Background

One-way door restrictions (also known as "lockouts" or "last entry" policies) impose a condition on a licence that allows people to leave places such as bars, taverns, pubs and nightclubs but not enter or re-enter after a certain time[337]. These restrictions are designed to prevent a large number of people coming out of licensed premises at the same time (as would be the case with a universal maximum closing time) and the potential for intoxicated patrons migrating between venues or interacting with others with an increased likelihood of disorder and crime.

In 2010, the Law Commission recommended that one-way door policies be mandatory for all on-licences and club licences if these premises are open after 2 am[338]. Although the Act did not follow through on the Law Commission's recommendation for a mandatory one-way door restriction, the Act does include the provisions for one-way door restrictions to be included in a LAP (section 77(1)(g) of the Act) and these can apply to the whole district or part of the district, such as an entertainment precinct[339]. Section 90(6) of the Act states that if the LAP has a new or modified one-way door policy, it can only take effect three months after the public notice of the adoption of the LAP.

The DLC or ARLA may also impose a one-way door restriction as a condition on a new or renewed on-licence or club licence independently of a LAP (section 110(1)(d) of the Act). However, if a LAP contains a one-way door restriction, then the licence holder must comply with the provision in that LAP, even if the licence condition is less restrictive (sections 50 and 111(2) of the Act).

The evidence

One-way door restrictions are seen as one of the policy levers to reduce alcohol-related problems associated with late night premises and minimise alcohol-related harm. These restrictions have the potential to reduce the burden on Police, ambulance and hospital services and can have a positive benefit for not only the patrons of premises but the community generally.

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 decade[340], and these restrictions were also trialled in some regions in New Zealand, such as central Christchurch (2007)[341], Dunedin (2008)[342] and Whangārei (2015)[343].

A systematic review of eight studies published prior to June 2017 found two studies showed a decline in assaults following one-way door implementation, one showed reductions in assaults only inside licensed premises, two studies showed increases in assaults, and three studies showed no difference[344].

Two studies have been published since this review. One study in Australia found that in Adelaide assault and alcohol-related assault rates (using facial fracture presentations to hospital) decreased by 9.3% and 10.5%, respectively, between lockout periods. Comparative analysis between Adelaide and a control area showed assaults decreased by 9.8% between lockout periods (from 51.2% to 41.4%)[345]. The other study, in the Whangārei Central Business District, found reductions in violent offences and drug and alcohol offences. However, compared to controls in other small towns, the differences were no longer statistically significant. Reports of anti-social behaviour increased, but may have been explained by greater monitoring and reporting[346].

It is also acknowledged that lockouts/one-way door policies are normally a part of a more comprehensive programme, and evaluations of their effects need to take into account changes in Police activity[347].

Examples

Eight adopted LAPs, covering 11 TAs, have mandatory one-way door policies as part of their LAP. Generally, the one-way door restrictions come into effect one hour before closing (typically 2 am), and either apply to all licences (four TAs) or only apply to on-licences (seven TAs). In most cases restrictions cover the whole district (e.g. Ashburton[348]), except for two LAPs where the policy applies to the inner/central city (Rotorua Lakes[349]) or non-residential areas (Dunedin[350]). Eight TAs apply the one-way door restriction on every day of the week, with Mackenzie, Timaru and Waimate Districts confining the policy to Friday, Saturday and Sunday mornings at 2 am in their joint LAP[351].

Many more TAs have included a one-way door provision as a discretionary condition for on- licences (30 TAs), club licences (15 TAs) and special licences (19 TAs). Six LAPs have included the time that should apply with this condition (Kaikōura[352], Ōtorohanga[353], Rotorua Lakes[354], Waikato[355], Waipā[356] and Waitomo[357]).

Discretionary one-way door conditions can supplement mandatory restrictions (seven TAs). For example, Dunedin City's LAP[358] has a mandatory restriction in non-residential areas and a discretionary condition covering other areas. Noticeably, discretionary conditions have been widely applied to special licences that would not otherwise be covered by a mandatory restriction, and most LAPs also have other conditions that support a one-way door policy (e.g. a "last orders" time for drinks in advance of closing).

Conclusion

In 2012, the Government devolved powers to TAs to implement evidence-based measures to address local alcohol availability. LAPs provide opportunities to limit the growth of new outlets in communities, restrict their location to protect sensitive sites and their users, and curb the harm from alcohol sales late at night. As such, they offer significant potential to address the inequities in alcohol consumption and harm that are driven by the effects of an unjust concentration of alcohol outlets in New Zealand's most deprived communities. This guide has summarised the evidence on the measures available via LAPs and provides recommendations to TAs to guide LAP decision-making processes.

Alcohol-related harm increases where alcohol is easily accessible – where there is a high concentration of alcohol outlets in a particular area, where trading hours are long, where businesses are conducted in such a way that impulsive alcohol purchases are encouraged, and where the price is affordable[359]. The harms from alcohol availability can be linked to several characteristics of their distribution in local areas. There are impacts as a result of proximity (e.g. distance or accessibility to nearest outlet), density (often measured in a number of ways, e.g. raw counts of outlets, outlets per population density), clustering, and reduced amenity that may directly, or indirectly, interact with one another to affect excessive alcohol use, alcohol-related disorder and violence[360]. These are the matters that can be addressed through a LAP.

It is anticipated that there will be a sharp increase in the number of TAs who undertake the process to develop and review a LAP for their district following the enactment of the 2023 Amendment Act[361] that removed the ability to appeal PLAPs and required DLCs to not only have regard to a LAP (section 105 of the Act) but also consider any inconsistency between an element of a LAP (sections 77(1)(a) to (d) of the Act) and a renewal of a licence (section 133 of the Act). Given the evolving status of TA LAPs, it will be necessary to regularly update this guide and respond to developments and suggested amendments.

References and endnotes

1 Sale and Supply of Alcohol (Community Participation) Amendment Act 2023 (Public Act 2023 No. 60). Available from: https://www.legislation.govt.nz/act/public/2023/0060/latest/LMS791367.html

2 New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission*, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

3 Supra at 1 = Sale and Supply of Alcohol (Community Participation) Amendment Act 2023 (Public Act 2023 No. 60). Available from: https://www.legislation.govt.nz/act/public/2023/0060/latest/LMS791367.html

4 Ministry of Justice. Key Initiatives: Local Alcohol Policies. Wellington. NZ. 2020. Available from: https://www.justice.govt.nz/justice-sector-policy/key-initiatives/sale-and-supply-of-alcohol/community-involvement/local-alcohol-policies/

5 Ministry of Justice. Recent changes to the Sale and Supply of Alcohol Act 2012. September 2023. Available from: https://taituara.org.nz/Attachment?Action=Download&Attachment_id=2902#:~:text=The%20Sale%20and%20Supply%20of%20Alcohol%20(Community%20Participation)%20Amendment%20Act,licensing%20process%20in%20the%20Act.

6 Auckland Council. *Literature Review of Mechanisms to Regulate the Supply of Alcohol for the Development of Auckland Council's Local Alcohol Policy* [Internet], Auckland Council, 2013. Technical Report No. TR2013/021. Available from: https://knowledgeauckland.org.nz/media/1635/tr2013-021-literature-review-of-mechanisms-to-regulate-the-supply-of-alcohol-for-the-development-of-auckland-s-local-alcohol-policy.pdf

7 Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council* and *Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45. Available from: https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf

8 Supra at 2 = New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

9 Te Aho O Te Kahu. Pūrongo Ārai Mate Pukupuku: *Cancer Prevention Report* [Internet]. Wellington: Te Aho O Te Kahu, Cancer Control Agency; 2022. Available from: https://hcmsitesstorage.blob.core.windows.net/cca/assets/Cancer_Prevention_V12_7_April22_05c46c078b.pdf

10 Te Hiringa Hauora / Health Promotion Agency. Alcohol access and availability: Position Statement. Wellington: Te Hiringa Hauora/Health Promotion Agency; 2022. Available from: https://www.hpa.org.nz/sites/default/files/3.0%20AL1195-A%20Access%20and%20Availability%20Position%20Statement.pdf

11 Mental Health and Addiction Inquiry. *He Ara Oranga: Report of the Government Inquiry into Mental Health and Addiction* [Internet]. Wellington: New Zealand Government; 2018. Available from: https://mentalhealth.inquiry.govt.nz/inquiry-report/he-ara-oranga/

12 World Health Organization. *Draft Action Plan (2022–2030) to effectively implement the global strategy to reduce the harmful use of alcohol as a public health priority* [Internet]. Geneva: World Health Organization; 2022. Available from: https://apps.who.int/gb/ebwha/pdf_files/EB150/B150_7Add1-en.pdf

13 World Health Organization. *The SAFER technical package: five areas of intervention at national and subnational levels*. Geneva: World Health Organization, 2019. Available from: https://apps.who.int/iris/bitstream/handle/10665/330053/9789241516419-eng.pdf

14 Crossin R, Cleland L, Wilkins C, et al. The New Zealand drug harms ranking study: A multi-criteria decision analysis. *Journal of Psychopharmacology*. 2023. Available from: https://doi.org/10.1177/02698811231182012.

15 Bonomo Y, Norman A, Biondo S, Bruno R, Daglish M, Dawe S, Egerton-Warburton D, Karro J, Kim C, Lenton S, Lubman DI. The Australian drug harms ranking study. *Journal of Psychopharmacology*. 2019; 33(7):759-68. Available from: https://doi.org/10.1177/0269881119841569

16 Nutt DJ, King LA, Phillips LD. Drug harms in the UK: a multicriteria decision analysis. *The Lancet* [Internet]. 2010;376(9752):1558-65. Available from: https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(10)61462-6/fulltext?cc=y=

17 Institute for Health Metrics and Evaluation. *Global Burden of Disease*. 2019. Available from: https://www.healthdata.org/research-analysis/health-by-location/profiles/new-zealand.

18 Hobbs M, Marek L, Wiki J, Campbell M, Deng BY, Sharpe H, McCarthy J, Kingham S. Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand. *Health & Place*. 2020; 65:1-7. Available from: https://doi.org/10.1016/j.healthplace.2020.102397.

19 Market Economics Limited (M.E. Consulting). *New Zealand Alcohol Supply and Demand Structures: Research report*. Wellington: Health Promotion Agency, 2018. Available from: https://www.hpa.org.nz/sites/default/files/NZ%20Alcohol%20Supply%20and%20Demand%20Structure%20Research%20Report%20FEB2018-Final.PDF.

20 Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. *Health & Place* [Internet]. 2014;29:186-99. Available from: https://doi.org/10.1016/j.healthplace.2014.07.002

21 Chambers T, Stanley J, Signal L, Pearson AL, Smith M, Barr M, Ni Mhurchu C. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol and Alcoholism*. 2018; 53(5):626-33. Available from: https://academic.oup.com/alcalc/article/53/5/626/5056455.

22 Sargent JD, Babor TF. The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs*, Supplement [Internet]. 2020;19:113-24. Available from: https://doi.org/10.15288/jsads.2020.s19.113.

23 Supra at 13 – World Health Organization. *The SAFER technical package: five areas of intervention at national and subnational levels*. Geneva: World Health Organization, 2019. Available from: https://apps.who.int/iris/bitstream/handle/10665/330053/9789241516419-eng.pdf

24 Supra at 13 – World Health Organization. *The SAFER technical package: five areas of intervention at national and subnational levels*. Geneva: World Health Organization, 2019. Available from: https://apps.who.int/iris/bitstream/handle/10665/330053/9789241516419-eng.pdf

25 Supra at 21 = Chambers T, Stanley J, Signal L, Pearson AL, Smith M, Barr M, Ni Mhurchu C. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol and Alcoholism*. 2018; 53(5):626-33. Available from: https://academic.oup.com/alcalc/article/53/5/626/5056455.

26 Gruenewald PJ, Freisthler B, Remer L, LaScala EA, Treno A. Ecological models of alcohol outlets and violent assaults: crime potentials and geospatial analysis. *Addiction* [Internet]. 2006; 101(5):666–77. Available from: https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1360-0443.2006.01405.x

27 Karriker-Jaffe KJ, Ohlsson H, Kendler KS, Cook WK, Sundquist K. Alcohol availability and onset and recurrence of alcohol use disorder: examination in a longitudinal cohort with co-sibling analysis. *Alcoholism: Clinical and Experimental Research* [Internet]. 2018; 42(6):1105-12. Available from: https://onlinelibrary.wiley.com/doi/abs/10.1111/acer.13752

28 Livingston M. A longitudinal analysis of alcohol outlet density and assault. *Alcoholism: Clinical and Experimental Research* [Internet]. 2008;32(6):1074-9. Available from: https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1530-0277.2008.00669.x

29 Pridemore WA, Grubesic TH. Community organization moderates the effect of alcohol outlet density on violence. *The British Journal of Sociology* [Internet]. 2012; 63(4):680-703. Available from: https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1468-4446.2012.01432.x

30 Cameron M P, Cochrane W, Gordon C, Livingston M. *The locally-specific impacts of alcohol outlet density in the North Island of New Zealand* [Internet]. Wellington: Health Promotion Agency; 2013. Available from: https://www.hpa.org.nz/sites/default/files/Alcohol%20Outlet%20Density.pdf

31 Supra at 20 = Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. *Health & Place* [Internet]. 2014;29:186-99. Available from: https://doi.org/10.1016/j.healthplace.2014.07.002

32 Pridemore WA, Grubesic TH. A spatial analysis of the moderating effects of land use on the association between alcohol outlet density and violence in urban areas. *Drug and alcohol review* [Internet]. 2012;31(4):385-93. Available from: https://doi.org/10.1111/j.1465-3362.2011.00329.x

33 Supra at 20 – Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. *Health & Place* [Internet]. 2014;29:186-99. Available from: https://doi.org/10.1016/j.healthplace.2014.07.002

34 Supra at 20 – Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. *Health & Place* [Internet]. 2014;29:186-99. Available from: https://doi.org/10.1016/j.healthplace.2014.07.002

35 See supra at 7 – Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council* and *Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45 at paragraph 79 and the reference to the "Wednesbury" standard of reasonableness (*Associated Provincial Picture Houses Ltd v Wednesbury Corporation* (1948) 1 KB 223) and the "precautionary principle" (Principle 15 of the Rio Declaration on Environment and Development 1992). Available from: https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf

36 *Redwood Corp Ltd v Auckland City Council* [2017] NZARLA PH 247–254 at paragraphs 37–39 referencing *Woolworths New Zealand Limited v Auckland Council* and *Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45 at paragraph 41 – Supra at 7. Available from: https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf

37 Auckland Council. *Provisional Auckland Council Local Alcohol Policy: Kaupapa Māhere ā-Takiwā mot te Waipiro* May 2015 (amended September 2017, in force 2024). Auckland: Auckland Council; 2015. Available from: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/Documents/provisional-lap-amended.pdf.

38 See supra at 7 – Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council* and *Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45. Available from: https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf at paragraph 83, and see the similar position taken by the Court of Appeal in *Auckland Council v Woolworths New Zealand Limited* [2021] NZCA 484 (24 September 2021) paragraph 16 available from: www.nzlii.org/nz/cases/NZCA/2021/484.html.

39 See supra at 7 – Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council* and *Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45. Available from: https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf) at paragraph 84.

40 *Hunters Corner Liquor* [2020] ADLC 8220056553, 7 July 2021, and see *Auckland Council v Woolworths New Zealand Limited* [2021] NZCA 484 (24 September 2021) paragraphs 56-64.

41 *The Medical Officer of Health (Wellington Region) v Lion Liquor Retail Limited*, at [43] and [47 – 48].

42 New Zealand Law Commission. Alcohol in our lives: An issues paper on the reform of New Zealand's liquor laws. Wellington: New Zealand Law Commission; 2009. Available from: https://www.lawcom.govt.nz/assets/Publications/IssuesPapers/NZLC-IP15.pdf.

43 The Justice and Electoral Committee. Alcohol Reform Bill: 236-2 [Internet]. Wellington: New Zealand Government; 2010. Available from: https://legislation.govt.nz/bill/government/2010/0236/34.0/whole.html.

44 In a national survey in 2019-20, 54% of New Zealanders supported or strongly supported having fewer places selling alcohol in local communities. Support was statistically higher among females (58%), Māori women (60%) and Pacific men (62%). Females aged 45 to 54 years (63%) and 65+ years (71%) also showed high levels of support. Aron A. & Allen K. Public attitudes on policy interventions to reduce alcohol harm: Results from the 2019/20 Alcohol Use in New Zealand Survey (AuiNZ). Wellington: Te Hiringa Hauora – Health Promotion Agency; 2021. Available from: https://www.hpa.org.nz/sites/default/files/Alcohol%20Use%20in%20NZ%20Survey%20%28AUiNZ%29%20Support%20for%20policy%20interventions.pdf.

45 See Sale and Supply of Alcohol (Cellar Door Tasting) Amendment Bill (Member's Bill 173-1). Available from: https://legislation.govt.nz/bill/member/2022/0173/4.0/whole.html.

46 Note that although charter clubs are not subject to licensing under the Sale and Supply of Alcohol Act 2012 (and any LAP), they may be if they operate outside the rules of their charter (granted under section 260(3) of the Licensing Act 1908 or earlier legislation). The Law Commission recommended that permanent club charters should no longer be exempt, as they believed that alcohol sold anywhere should necessitate the applications of licensing controls and host responsibility requirements. However, this recommendation was not taken up. Supra at 2 – New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Recommendation 116. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

47 Supra at 2 – New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

48 Gore District Council. Local Alcohol Policy 2020. Available from: https://www.goredc.govt.nz/repository/libraries/id:2buwl3j7c17q9srz9ase/hierarchy/Your%20Council/Documents/Plans%2C%20policies%20and%20bylaws/Bylaws%20and%20Policies/Main/Local%20Alcohol%20Policy%202020. Note that Gore District Council's first LAP was a joint LAP with Invercargill City and Southland District Councils.

49 Tauranga City Council and Western Bay of Plenty District Council. Tauranga and Western Bay of Plenty Local Alcohol Policy 2015. Available from: https://www.tauranga.govt.nz/Portals/0/data/council/policies/files/lap_policy.pdf and Tauranga City Council. Local Alcohol Policy 2024. Available from https://letstalk.tauranga.govt.nz/Portals/14/data/citywide/local-alcohol-policy/files/local-alcohol-policy-8july24.pdf.

50 Western Bay of Plenty District Council. Local Alcohol Policy 2022. Available from: https://www.westernbay.govt.nz/repository/libraries/id:25p4fe6mo17q9stw0v5w/hierarchy/rules-regulations-licenses/bylaws-and-policies/documents/2022%20Provisional%20Local%20Alcohol%20Policy%20-%20PDF.pdf.

51 See for example Tauranga City Council. Public Notice of Discontinuance of Local Alcohol Policy Review. Posted 7 November 2023. Available from: https://www.tauranga.govt.nz/council/about-your-council/council-meetings-agendas-and-minutes/council-meeting-archive/artmid/7996/articleid/9557. The Council resolved to adopt the LAP on 30 October 2023 to come into force on 12 February 2024 but discontinued the process within 30 days of its notification citing section 82 of the Sale and Supply of Alcohol Act 2012. The Council recommenced the process and adopted the draft LAP on 25 March 2024 to come into force on 8 July 2024. https://letstalk.tauranga.govt.nz/Portals/14/data/citywide/local-alcohol-policy/files/local-alcohol-policy-8july24.pdf.

52 Supra at 2 – New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

53 The World Health Organization lists monitoring and surveillance as one of the top 10 strategies to reduce the harmful use of alcohol, as the data creates the basis for the success and appropriate delivery of other key policy options. This information is needed to monitor the magnitude and trends of alcohol-related harms, to strengthen advocacy, to inform agencies and communities, to formulate policies, and to assess the impact of interventions. World Health Organization. Global strategy to reduce the harmful use of alcohol [Internet]. Geneva: World Health Organization; 2010. Available from: https://iris.who.int/bitstream/handle/10665/44395/9789241599931_eng.pdf?sequence=1

54 Health New Zealand | Te Whatu Ora. National Alcohol Harm Minimisation Framework, 2022. Available from: https://www.hpa.org.nz/national-alcohol-harm-minimisation-framework

55 Stats NZ. Integrated Data Infrastructure (IDI). Available from: https://www.stats.govt.nz/integrated-data/integrated-data-infrastructure/

56 Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109.

57 Office of the Minister of Justice (2010), *Alcohol Law Reform*, response to DOM Min (10) 8/1, 20.

58 Supra at 2 – New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf.

59 Supra at 43 – New Zealand Parliament. Alcohol Reform Bill: 236-2 Commentary. Wellington, New Zealand, 2010. Available from: https://www.legislation.govt.nz/bill/government/2010/0236/34.0/whole.html

60 Supra at 7 – Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council* and *Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45. Available from: https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf

61 For example, TAB Venue Policies (Racing Industry Act 2020) and Class 4 Gambling Venue Policy (Gambling Act 2003), Local Approved Products (Psychoactive Substances) Policy (Psychoactive Substances Act 2013).

62 See Local Government Act 2002: section 14 "Principles relating to local authorities", section 4 (Treaty of Waitangi), Parts 2 and 6 generally and also sections 14, 78 and 81 and clause 5 Schedule 10.

63 Also t'chakat henu in Rekohu/Wharekauri/Chatham Islands.

64 The adoption, amendment or revocation of LAPs are typically included in TA's Significance and Engagement Policies e.g.: Auckland Council (2014), Clutha District Council (2021), Kaikoura District Council (2014), Kaipara District Council (2020), Kapiti Coast District Council (2018), Matamata-Piako District Council (2020), Ōtorohanga District Council (2021), South Waikato District Council (2021), Thames Coromandel District Council (2023), Timaru District Council (2014), Waimakariri District Council (2021), Waitaki District Council (2014), Waitomo District Council (2021), Wellington City Council (2018), Whakatane District Council (2020), Whangarei District Council (2020).

65 Maclennan B, Kypri K, Connor J. Do New Zealand communities have greater input to local alcohol policy? Population surveys before and after new legislation [Internet]. *International Journal of Drug Policy*. 2019;74:112-5. Available from: https://doi.org/10.1016/j.drugpo.2019.09.016

66 Maynard K. Te Tiriti o Waitangi and Alcohol Law [Internet]. Wellington: Te Hiringa Hauora/Health Promotion Agency; 2022. Available from: https://www.hpa.org.nz/sites/default/files/Te%20Tiriti%20o%20Waitangi%20and%20alcohol%20law.pdf

67 Supra at 66 – Maynard K. Te Tiriti o Waitangi and Alcohol Law [Internet]. Wellington: Te Hiringa Hauora/Health Promotion Agency; 2022. Available from: https://www.hpa.org.nz/sites/default/files/Te%20Tiriti%20o%20Waitangi%20and%20alcohol%20law.pdf

68 Porirua City Council. Local Alcohol Policy 2017. Available from: https://storage.googleapis.com/pcc-wagtail-media/documents/Local_Alcohol_Policy_2017.pdf. Note that Porirua City Council's review of the 2017 LAP includes a public survey – see https://www.surveymonkey.com/r/LAPSurvey2023.

69 Nielsen. Information to support the development of a local alcohol policy an investigation of public opinions, attitudes and beliefs relating to the role of alcohol in Aucklanders' lives, its consequences and how it could be managed. Alcohol-related Harms Research Report prepared for Auckland Council. 2011 (referred to in Auckland Council. Local Alcohol Policy Research Report. 2011. Available from: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/localalcoholkeydocuments/localalcoholpolicyresearchreport.pdf).

70 Supra at 56 – Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109.

71 Rotorua Lakes Council. Local Alcohol Policy 2019. Available from: https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/our-council/policiesandbylaws/bylaws/Adopted-Local-Alcohol-Policy-18-February-2019-signed-copy.pdf.

72 See for example, Waikato District Council. Statement of Proposal for Proposed Waikato District Council Local Alcohol Policy 2014. "At this point the Council does not feel that on-licence premises in the commercially zoned areas of the main urban towns of the district need to be restricted in relation to other licensed premises or certain facilities as this is covered by the District Plan." Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy/lap-statement-of-proposal-final.pdf?sfvrsn=46e5b8c9_2.

73 See section 77A(2) Resource Management Act 1991 for the categories: permitted, prohibited, non-complying, controlled, restricted discretionary, discretionary. Note that even where there are no restrictions in the district plan, an applicant for a licence to sell alcohol must still first obtain a certificate to confirm that the proposed premises meets both the district plan and the Building Code (Building Regulations 1992).

74 Supra at 2 – New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

75 See for example, Stacy C, Meixell B, Lowy J, Thornton RL. Using land policy to improve population health [Internet]. *Journal of Urban Health* 2020;97:887–98. Available from: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7704889/. See further: Policy Brief Health in All Policies: Evaluating the Use of Alcohol Outlet Zoning Policy to Improve Health, Safety, and Economic Conditions in Urban Neighborhoods. Applied Research Seed Grant Award. 2017. Available from: https://21cc.jhu.edu/wp-content/uploads/2020/08/alcohol-outlets-policy-brief.pdf

76 Trangenstein PJ, Eck RH, Lu Y, Webster D, Jennings JM, Latkin C, Milam AJ, Furr-Holden D, Jernigan DH. The violence prevention potential of reducing alcohol outlet access in Baltimore, Maryland [Internet]. *Journal of Studies on Alcohol and Drugs*. 2020;81(1):24-33. Available from: https://doi.org/10.15288/jsad.2020.81.24

77 Matson PA, Stankov I, Hassmiller Lich K, Flessa S, Lowy J, Thornton RL. A systems framework depicting how complex neighborhood dynamics and contextual factors could impact the effectiveness of an alcohol outlet zoning policy [Internet]. *American journal of community psychology*. 2022;70(1-2):18-32. Available from: https://doi.org/10.1002/ajcp.12566

78 Wairarapa Local Alcohol Policy 2018 (Carterton District Council, Masterton District Council, South Wairarapa District Council). Available from: https://swdc.govt.nz/wp-content/uploads/Wairarapa%20%20Local%20Alcohol%20Policy_Adopted_03Aug2018_0.pdf.

79 Central Hawke's Bay District Council. Local Alcohol Policy 2018. Available from: https://www.chbdc.govt.nz/assets/Uploads/20180925-FINAL-FOR-PUBLIC-Local-Alcohol-Policy-2018.pdf.

80 Horowhenua District Council. Local Alcohol Policy 2020. Available from: https://www.horowhenua.govt.nz/Council/Local-Bylaws-Policies/Local-Alcohol-Policy.

81 Matamata-Piako District Council. Local Alcohol Policy 2023. Available from: https://www.mpdc.govt.nz/filelink/fileman-files/News/HaveYourSay/2023-24%20Policies/LocalAlcoholPolicy2023%20(1).pdf.

82 New Plymouth District Council and Stratford District Council. Local Alcohol Policy 2017. Available from: https://www.npdc.govt.nz/media/45ukjowv/local-alcohol-policy.pdf.

83 Selwyn District Council. Local Alcohol Policy 2017. Available from: https://www.selwyn.govt.nz/__data/assets/pdf_file/0017/220166/Adopted-LAP.pdf.

84 Tasman District Council. Local Alcohol Policy 2015 (reviewed without change 5 November 2020). Available from https://www.tasman.govt.nz/document/serve/Local%20Alcohol%20Policy%20Reviewed%20and%20continued%205%20November%202020.pdf?DocID=32004.

85 Waikato District Council. Local Alcohol Policy 2017. Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy-2017.pdf?sfvrsn=8522bbc9_4. Note that Waikato District Council reviewed its LAP and adopted a Provisional LAP on 6 October 2022 and is awaiting the outcome of appeals – see https://shape.waikatodistrict.govt.nz/local-alcohol-policy.

86 Waimakariri District Council. Local Alcohol Policy 2018. Available from: https://www.waimakariri.govt.nz/__data/assets/pdf_file/0013/120622/Local-Alcohol-Policy-20181217.pdf.

87 Waipā District Council. Local Alcohol Policy 2016. Available from: https://www.waipadc.govt.nz/repository/libraries/id:26zgz4o7s1cxbyk7hfo7/hierarchy/our-council/haveyoursay/recentlyclosedconsultations/provisionallocalalcoholpolicy/documents/Local%20Alcohol%20Policy%20FINAL%20adopted.pdf. The 2016 LAP has been reviewed in 2024. See Waipā District Council. Waipā's alcohol policy and bylaw review. Available at https://haveyoursay.waipadc.govt.nz/waipas-local-alcohol-policy.

88 Waitomo District Council. Local Alcohol Policy 2022 Available from: https://www.waitomo.govt.nz/media/stfecmkv/provisional-local-alcohol-policy-2022.pdf.

89 Supra at 83 – Selwyn District Council. Local Alcohol Policy 2017. Available from: https://www.selwyn.govt.nz/__data/assets/pdf_file/0017/220166/Adopted-LAP.pdf.

90 See for example, Eastern Bay of Plenty LAP 2016 (Kawerau, Whakatāne and Ōpotiki Districts) clause 6.2.5 "The Committee may grant an on, off or club licence for any premises located in any zone where the sale and supply of alcohol is a permitted activity under the relevant District Plan. Applications will not be considered in other areas unless a resource consent has been granted." Available from: https://www.whakatane.govt.nz/sites/www.whakatane.govt.nz/files/documents/eastern_bay_of_plenty_lap_pdf_0.pdf. See further the expanded provision in the Eastern Bay of Plenty Provisional Local Alcohol Policy 2023 (subject to appeal) clause 9.1. Available from: https://www.odc.govt.nz/repository/libraries/id:2bpcqtp1b1cxby3k9b0b/hierarchy/sitecollectiondocuments/our-council/Have%20your%20Say/LAP%20Review%202023/Draft%20Eastern%20Bay%20of%20Plenty%20Local%20Alcohol%20Policy.pdf. Note also that a number of LAPs had a provision in a draft or provisional LAP that was later deleted, see for example Tauranga and Western Bay Local Alcohol Policy 2015 where the draft policy condition that no new licensed premises were permitted in areas zoned industrial in either the City Plan or District Plan was deleted in the provisional and final policy. Tauranga and Western Bay of Plenty Local Alcohol Policy 2015. Available from: https://www.tauranga.govt.nz/Portals/0/data/council/policies/files/lap_policy.pdf.

91 See for example, Matamata-Piako District Council Local Alcohol Policy 2023 (clause 3.2.2) where, in relation to the granting of an off-licence, regard is to be given to the principles of Crime Prevention Through Environmental Design (CPTED) and the impact on the amenity and good order of the neighbourhood. Supra at 81 – Matamata-Piako District Council. Local Alcohol Policy 2023. Available from: https://www.mpdc.govt.nz/filelink/fileman-files/News/HaveYourSay/2023-24%20Policies/LocalAlcoholPolicy2023%20(1).pdf.

92 Hastings District Council and Napier City Council. Local Alcohol Policy 2019. Available from: https://www.hastingsdc.govt.nz/assets/Document-Library/Policies/Liquor-Licensing-Policy/Local-Alcohol-Policy.pdf.

93 Supra at 92 – Hastings District Council and Napier City Council. Local Alcohol Policy 2019. Available from: https://www.hastingsdc.govt.nz/assets/Document-Library/Policies/Liquor-Licensing-Policy/Local-Alcohol-Policy.pdf.

94 Hutt City Council. Local Alcohol Policy 2018. Available from: https://hccpublicdocs.azurewebsites.net/api/download/dca10d32fed24fb48c89a051398ef73e/_CM9-WE/ee1dd1b9188726e48e09e7e4f986c255c21.

95 Invercargill City Council and Southland District Council. Local Alcohol Policy 2019. Available from: https://icc.govt.nz/wp-content/uploads/2020/04/2020-03-31-Operative-Combined-Local-Alcohol-Policy-2019.pdf.

96 For example, see Tauranga City Council Local Alcohol Policy 2024 (in force 8 July 2024) where no new licences for bottle stores could be located in suburbs with a social deprivation index of 9 or 10 (clause 5.2). See Tauranga City Council Local Alcohol Policy 2024. Available from: https://letstalk.tauranga.govt.nz/Portals/14/data/citywide/local-alcohol-policy/files/local-alcohol-policy-8july24.pdf.

97 Cameron M P, Cochrane W, McNeill K, Melbourne P, Morrison S L, Robertson N. *The Impacts of Liquor Outlets in Manukau City Report No. 3: The spatial and other characteristics of liquor outlets in Manukau City* [Internet]. Wellington: Alcohol Advisory Council of New Zealand; 2012. Available from: https://www.hpa.org.nz/sites/default/files/imported/field_research_publication_file/ManukauReportSummaryREVISED.PDF

98 Supra at 97 – Cameron M P, Cochrane W, McNeill K, Melbourne P, Morrison S L, Robertson N. *The Impacts of Liquor Outlets in Manukau City Report No. 3: The spatial and other characteristics of liquor outlets in Manukau City* [Internet]. Wellington: Alcohol Advisory Council of New Zealand; 2012. Available from: https://www.hpa.org.nz/sites/default/files/imported/field_research_publication_file/ManukauReportSummaryREVISED.PDF

99 Graham K, Bernards S, Osgood DW, Wells S. Bad nights or bad bars? Multi-level analysis of environmental predictors of aggression in late-night large-capacity bars and clubs [Internet]. *Addiction.* 2006;101(11):1569-80. Available from: https://doi.org/10.1111/j.1360-0443.2006.01608.x

100 Graham K, Bernards S, Osgood DW, Homel R, Purcell J. Guardians and handlers: The role of bar staff in preventing and managing aggression [Internet]. *Addiction.* 2005;100(6):755-66. https://doi.org/10.1111/j.1360-0443.2005.01075.x

101 Graham K, Tremblay PF, Wells S, Pernanen K, Purcell J, Jelley J. Harm, intent, and the nature of aggressive behavior: Measuring naturally occurring aggression in barroom settings [Internet]. *Assessment.* 2006;13(3):280-96. Available from: https://doi.org/10.1177/1073191106288180

102 Grubesic TH, Pridemore WA. *Alcohol outlets and clusters of violence [Internet]. International journal of health geographics.* 2011;10:1-12. Available from: https://link.springer.com/article/10.1186/1476-072X-10-30

103 Wilkinson C, MacLean S, Room R. *Restricting alcohol outlet density through cumulative impact provisions in planning law: challenges and opportunities for local governments* [Internet]. *Health & Place.* 2020;61:1-9. Available from: https://doi.org/10.1016/j.healthplace.2019.102227

104 House of Commons. UK Parliament. Alcohol licensing: cumulative impact assessments. Research Briefing. 2023. Available from: https://researchbriefings.files.parliament.uk/documents/CBP-7269/CBP-7269.pdf.

105 Egan M, Brennan A, Buykx P, De Vocht F, Gavens L, Grace D, Halliday E, Hickman M, Holt V, Mooney JD, Lock K. Local policies to tackle a national problem: Comparative qualitative case studies of an English local authority alcohol availability intervention [Internet]. *Health & Place.* 2016; 41:11-8. Available from: https://doi.org/10.1016/j.healthplace.2016.06.007.

106 Supra at 97 – Cameron M P, Cochrane W, McNeill K, Melbourne P, Morrison S L, Robertson N. *The Impacts of Liquor Outlets in Manukau City Report No. 3: The spatial and other characteristics of liquor outlets in Manukau City* [Internet]. Wellington: Alcohol Advisory Council of New Zealand; 2012. Available from: https://www.hpa.org.nz/sites/default/files/imported/field_research_publication_file/ManukauReportSummaryREVISED.PDF

107 Supra at 2 – New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission,* 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf.

108 Block RL, Block CR. Space, place and crime: Hot spot areas and hot places of liquor-related crime [Internet]. *Crime and place*. 1995;4(2):145-84. Available from: https://popcenter.asu.edu/sites/default/files/Library/CrimePrevention/Volume_04/07-BlockBlock-3.pdf

109 Cameron M, Cochrane W, Livingston M. The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand, 2007-2014 [Internet]. Wellington: Health Promotion Agency; 2019. Available from: https://apo.org.au/sites/default/files/resource-files/2019-10/apo-nid264526.pdf

110 Popova S, Giesbrecht N, Bekmuradov D, Patra J. Hours and days of sale and density of alcohol outlets: impacts on alcohol consumption and damage: a systematic review [Internet]. *Alcohol & Alcoholism*. 2009;44(5):500-16. Available from: https://doi.org/10.1093/alcalc/agp054

111 Connor JL, Kypri K, Bell ML, Cousins K. Alcohol outlet density, levels of drinking and alcohol-related harm in New Zealand: a national study [Internet]. *J Epidemiol Community Health*. 2011;65(10):841-6. Available from: https://jech.bmj.com/content/65/10/841.short

112 World Health Organization. *A public health perspective on alcohol establishments: licensing, density, and locations* [Internet]. Geneva: World Health Organization; 2022. Available from: https://www.who.int/publications/i/item/9789240061385

113 Supra at 30 – Cameron MP, Cochrane W, Gordon C, Livingston M. *The locally-specific impacts of alcohol outlet density in the North Island of New Zealand* [Internet]. Wellington: Health Promotion Agency; 2013. Available from: https://www.hpa.org.nz/sites/default/files/Alcohol%20Outlet%20Density.pdf

114 Supra at 109 – Cameron M, Cochrane W, Livingston M. *The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand*, 2007-2014 [Internet]. Wellington: Health Promotion Agency; 2019. Available from: https://apo.org.au/sites/default/files/resource-files/2019-10/apo-nid264526.pdf

115 Hauraki District Council's Local Alcohol Policy 2022 prohibits further off-licences (excluding supermarkets and grocery stores) from locating within 50 metres of the boundary of an existing off-licensed premises (Policy 4.2.1). Hauraki District Council. Local Alcohol Policy 2022. Available from: https://www.hauraki-dc.govt.nz/repository/libraries/id:2jpo4nuxg17q9srdjc4b/hierarchy/Policies/Local-Alcohol-Policy-2022.pdf.

116 Supra at 80 – Horowhenua District Council. Local Alcohol Policy 2020. Available from: https://www.horowhenua.govt.nz/Council/Local-Bylaws-Policies/Local-Alcohol-Policy.

117 Supra at 81 – Matamata-Piako District Council. Local Alcohol Policy 2023. Available from: https://www.mpdc.govt.nz/filelink/fileman-files/News/HaveYourSay/2023-24%20Policies/LocalAlcoholPolicy2023%20(1).pdf.

118 Ōtorohanga District Council. Local Alcohol Policy 2016. Available from: https://www.otodc.govt.nz/media/dtjehhbg/lapp-final.pdf. On 24 September 2024, the Council adopted the 2024 LAP to come into force on 28 October 2024. Ōtorohanga District Council. Local Alcohol Policy 2024. Available from: https://www.otodc.govt.nz/assets/Documents/Policies/Local-Alcohol-Policy-final-24-September-2024.pdf.

119 Supra at 85 – Waikato District Council. Local Alcohol Policy 2017. Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy-2017.pdf?sfvrsn=8522bbc9_4.

120 Supra at 87 – Waipā District Council. Local Alcohol Policy 2016. Available from: https://www.waipadc.govt.nz/repository/libraries/id:26zgz4o7s1cxbyk7hfo7/hierarchy/our-council/haveyoursay/recentlyclosedconsultations/provisionallocalalcoholpolicy/documents/Local%20Alcohol%20Policy%20FINAL%20adopted.pdf. The 2016 LAP has been reviewed in 2024. See Waipā District Council. Waipā's alcohol policy and bylaw review. Available at https://haveyoursay.waipadc.govt.nz/waipas-local-alcohol-policy.

121 Supra at 88 – Waitomo District Council. Local Alcohol Policy 2022. Available from: https://www.waitomo.govt.nz/media/stfecmkv/provisional-local-alcohol-policy-2022.pdf.

122 Supra at 85 – Waikato District Council. Local Alcohol Policy 2017. Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy-2017.pdf?sfvrsn=8522bbc9_4.

123 For example: in Canada, Calgary requires a separation of 150 metres for proposed liquor stores and Edmonton City requires a separation distance of 100 metres from any site being used for community or recreation activities, public or private education, or public lands; in California, a licence can be denied if it is located: (a) within the immediate vicinity of churches and hospitals; or (b) within at least 600 feet (180 metres) of schools, public playgrounds and non-profit youth facilities; and in Pennsylvania, new alcohol outlets or transferred licences cannot be located within 300 feet (~90 metres) of schools, churches, hospitals and playgrounds.

124 Hippensteel CL, Sadler RC, Milam AJ, Nelson V, Debra Furr-Holden C. Using zoning as a public health tool to reduce oversaturation of alcohol outlets: an examination of the effects of the new "300 foot rule" on packaged goods stores in a mid-Atlantic city [Internet]. *Prevention Science*. 2019;20:833-43. Available from: https://doi.org/10.1007/s11121-018-0947-9

125 Cardoza LS, Machado CO, Santos CT, Höfelmann DA. Alcohol outlets availability in school neighborhoods and alcohol use among adolescents [Internet]. *Cadernos de Saúde Pública*. 2020;36. Available from: https://www.scielo.br/j/csp/a/TSqQhGYhYBxSRq5SZxrmbBP/?lang=en

126 Grubesic TH, Murray AT, Pridemore WA, Tabb LP, Liu Y, Wei R. Alcohol beverage control, privatization and the geographic distribution of alcohol outlets [Internet]. *BMC public health*. 2012;12(1):1-10. Available from: https://bmcpublichealth.biomedcentral.com/articles/10.1186/1471-2458-12-1015

127 National Health Research and Medical Council. Australian guidelines to reduce health risks from drinking alcohol [Internet]. Canberra: Australian Government; 2020. Available from: https://www.nhmrc.gov.au/about-us/publications/australian-guidelines-reduce-health-risks-drinking-alcohol#download

128 Kypri K, Bell ML, Hay GC, Baxter J. Alcohol outlet density and university student drinking: a national study [Internet]. *Addiction*. 2008;103(7):1131-8. Available from: https://doi.org/10.1111/j.1360-0443.2008.02239.x

129 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

130 Supra at 21 – Chambers T, Stanley J, Signal L, Pearson AL, Smith M, Barr M, Ni Mhurchu C. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol and Alcoholism*. 2018; 53(5):626-33. Available from: https://academic.oup.com/alcalc/article/53/5/626/5056455

131 Huckle T, Huakau J, Sweetsur P, Huisman O, Casswell S. Density of alcohol outlets and teenage drinking: living in an alcogenic environment is associated with higher consumption in a metropolitan setting. *Addiction*. 2008;103(10):1614-21. Available from: https://doi.org/10.1111/j.1360-0443.2008.02318.x

132 Rowland B, Toumbourou JW, Livingston M. The association of alcohol outlet density with illegal underage adolescent purchasing of alcohol. *Journal of Adolescent Health*. 2015 Feb 1;56(2):146-52. Available from: https://doi.org/10.1016/j.jadohealth.2014.08.005

133 Chen MJ, Gruenewald PJ, Remer LG. Does alcohol outlet density affect youth access to alcohol? [Internet]. *Journal of Adolescent Health*. 2009;44(6):582-9. Available from: https://doi.org/10.1016/j.jadohealth.2008.10.136

134 Gruenewald PJ, Remer LG, LaScala EA. *Testing a social ecological model of alcohol use: the California 50-city study* [Internet]. *Addiction.* 2014;109(5):736-45. Available from: https://doi.org/10.1111/add.12438

135 Supra at 129 – 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

136 Supra at 132 – Rowland B, Toumbourou JW, Livingston M. The association of alcohol outlet density with illegal underage adolescent purchasing of alcohol. *Journal of Adolescent Health*. 2015 Feb 1;56(2):146-52. Available from: https://doi.org/10.1016/j.jadohealth.2014.08.005

137 Treno AJ, Ponicki WR, Remer LG, Gruenewald PJ. Alcohol outlets, youth drinking, and self-reported ease of access to alcohol: A constraints and opportunities approach [Internet]. *Alcoholism: Clinical and Experimental Research*. 2008; 32(8):1372-9. Available from: https://doi.org/10.1111/j.1530-0277.2008.00708.x

138 Jackson N, Denny S, Sheridan J, Fleming T, Clark T, Teevale T, Ameratunga S. Predictors of drinking patterns in adolescence: a latent class analysis [Internet]. *Drug and Alcohol Dependence*. 2014;135:133-9. Available from: https://doi.org/10.1016/j.drugalcdep.2013.11.021

139 Rowland B, Evans-Whipp T, Hemphill S, Leung R, Livingston M, Toumbourou JW. The density of alcohol outlets and adolescent alcohol consumption: An Australian longitudinal analysis [Internet]. *Health & Place*. 2016; 37:43-9. Available from: https://doi.org/10.1016/j.healthplace.2015.11.004

140 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

141 Oakley Browne, M.A., Wells, J.E., Scott, K.M. (eds). *Te rau Hinengaro: The New Zealand Mental Health Survey* [Internet]. Wellington: Ministry of Health; 2006. Available from: https://www.health.govt.nz/system/files/documents/publications/mental-health-survey.pdf

142 Supra at 140 – 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

143 Supra at 141 – Oakley Browne, M.A., Wells, J.E., Scott, K.M. (eds). *Te rau Hinengaro: The New Zealand Mental Health Survey* [Internet]. Wellington: Ministry of Health; 2006. Available from: https://www.health.govt.nz/system/files/documents/publications/mental-health-survey.pdf

144 Stahler GJ, Mazzella S, Mennis J, Chakravorty S, Rengert G, Spiga R. The effect of individual, program, and neighborhood 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

145 Stahler GJ, Mennis J, Cotlar R, Baron DA. The influence of neighborhood environment on treatment continuity and rehospitalization in dually diagnosed patients discharged from acute inpatient care [Internet]. *American Journal of Psychiatry*. 2009;166(11):1258-68. Available from: https://doi.org/10.1176/appi.ajp.2009.08111667

146 Forster, M.E., Ratima, M.M. *Healthy Marae: A report for Midlands Regional Health Authority*. Wellington: Ministry of Health; 1997. Available from: https://www.moh.govt.nz/notebook/nbbooks.nsf/0/99E7E64C7D91AABDCC256AC600098DAA/$file/healthy%20marae.pdf

147 Hutt M, Andrews P. *Māori & Alcohol: A History*. Wellington: Health Services Research Centre/ALAC; 1999.

148 For example, see Whanganui District Council. Local Alcohol Research Report. 2016. Available from: https://www.whanganui.govt.nz/files/assets/public/v/1/consultations/lap-research-report-final.pdf.

149 Espiner E, Houia-Ashwell, N. COVID-19 and the disproportionate harms of gambling, alcohol and the obesogenic environment in Maori. *The New Zealand Medical Student Journal* 2020; 31:44-7.

150 Walker K. *Issues of tobacco, alcohol and other substance abuse for Maori*. Report commissioned by the Waitangi Tribunal for Stage 2 of the Health Services and Outcomes Kaupapa Inquiry (Wai 2575). 2019. Available from: https://forms.justice.govt.nz/search/Documents/WT/wt_DOC_155808738/Wai%202575%2C%20B030.pdf.

151 Waitangi Tribunal. *Decision on application for an urgent hearing by David Ratu in relation to the Sale and Supply of Alcohol Act 2012* (Wai 2624). 2019. Available from: https://forms.justice.govt.nz/search/Documents/WT/wt_DOC_148205985/Wai%202624%2C%202.5.003.pdf.

152 See for example California where the State recognises churches as sensitive sites by allowing a licence to be denied if the outlet is to be located within the immediate vicinity of a church [California Department of Alcoholic Beverage Control. Frequently Asked Questions. California: State of California; 2022]. Likewise, in Pennsylvania, new alcohol outlets or transferred licences cannot be located within 300 feet (~90 metres) from churches. Supra at 126 – Grubesic TH, Murray AT, Pridemore WA, Tabb LP, Liu Y, Wei R. Alcohol beverage control, privatization and the geographic distribution of alcohol outlets [Internet]. *BMC public health*. 2012;12(1):1-10. Available from: https://bmcpublichealth.biomedcentral.com/articles/10.1186/1471-2458-12-1015]

153 See for example application for an off-licence for a Bottle-O shop near a skate park in Palmerston North. "Another liquor store for Palmerston North resisted" Manawatu Standard 13 February 2024. Available from: https://www.stuff.co.nz/nz-news/350175597/another-liquor-store-palmerston-north-resisted and licence application available from: https://drive.google.com/file/d/1Dtm_TECE07h7eytpF37Ey7z4w4MfMFuO/view

154 Supra at 126 – Grubesic TH, Murray AT, Pridemore WA, Tabb LP, Liu Y, Wei R. Alcohol beverage control, privatization and the geographic distribution of alcohol outlets [Internet]. *BMC public health*. 2012;12(1):1-10. Available from: https://bmcpublichealth.biomedcentral.com/articles/10.1186/1471-2458-12-1015]

155 See however, clause 3.1.1 of the Gisborne District Council Local Alcohol Policy 2018 and the DLC decision to grant an on-licence within 150 meters of a kura. Radio New Zealand. "Gisborne bar granted permission to open near kura". 12 May 2023. https://www.rnz.co.nz/news/ldr/489773/gisborne-bar-granted-permission-to-open-near-kura. The 2018 LAP was reviewed in 2024 and in force on 26 August 2024. The 2024 LAP carried over the policy in 3.1.1 preventing new licences (except restaurants, cafes and special licences) from locating within 150 metres of an existing sensitive site. See Gisborne District Council Local. Alcohol Policy 2024. Available from: https://www.gdc.govt.nz/services/alcohol-and-food/local-alcohol-policy.

156 For an example of a definition of "places of worship" see Waipā District Council LAP 2016 that "includes any church, mosque or other facility designed primarily for worship and related religious activities". Supra at 87 – Waipā District Council. Local Alcohol Policy 2016. Available from: https://www.waipadc.govt.nz/repository/libraries/id:26zgz4o7s1cxbyk7hfo7/hierarchy/our-council/haveyoursay/recentlyclosedconsultations/provisionallocalalcoholpolicy/documents/Local%20Alcohol%20Policy%20FINAL%20adopted.pdf. The 2016 LAP has been reviewed in 2024. See Waipā District Council. Waipā's alcohol policy and bylaw review. Available at https://haveyoursay.waipadc.govt.nz/waipas-local-alcohol-policy.

157 Supra at 155 – see Gisborne District Council Local. Alcohol Policy 2024. Available from: https://www.gdc.govt.nz/services/alcohol-and-food/local-alcohol-policy.

158 Supra at 80 – Horowhenua District Council. Local Alcohol Policy 2020. Available from: https://www.horowhenua.govt.nz/Council/Local-Bylaws-Policies/Local-Alcohol-Policy.

159 Supra at 71 – Rotorua Lakes Council. Local Alcohol Policy 2019. Available from: https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/our-council/policiesandbylaws/bylaws/Adopted-Local-Alcohol-Policy-18-February-2019-signed-copy.pdf.

160 Wairoa District Council. Local Alcohol Policy 2020. Available from: https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf.

161 Supra at 56 – Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109.

162 Supra at 80 – Horowhenua District Council. Local Alcohol Policy 2020. Available from: https://www.horowhenua.govt.nz/Council/Local-Bylaws-Policies/Local-Alcohol-Policy.

163 Supra at 68 – Porirua City Council. Local Alcohol Policy 2017. Available from: https://storage.googleapis.com/pcc-wagtail-media/documents/Local_Alcohol_Policy_2017.pdf.

164 Supra at 82 – New Plymouth District Council and Stratford District Council. Local Alcohol Policy 2017. Available from: https://www.npdc.govt.nz/media/45ukjowv/local-alcohol-policy.pdf.

165 Supra at 82 – New Plymouth District Council and Stratford District Council. Local Alcohol Policy 2017. Available from: https://www.npdc.govt.nz/media/45ukjowv/local-alcohol-policy.pdf.

166 Supra at 160 – Wairoa District Council. Local Alcohol Policy 2020. Available from: https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf.

167 Supra at 56 – Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109.

168 Supra at 48 = Gore District Council. Local Alcohol Policy 2020. Available from: https://www.goredc.govt.nz/repository/libraries/id:2buwl3j7c17q9srz9ase/hierarchy/Your%20Council/Documents/Plans%2C%20policies%20and%20bylaws/Bylaws%20and%20Policies/Main/Local%20Alcohol%20Policy%202020.

169 Supra at 95 – Invercargill City Council and Southland District Council. Local Alcohol Policy 2019. Available from: https://icc.govt.nz/wp-content/uploads/2020/04/2020-03-31-Operative-Combined-Local-Alcohol-Policy-2019.pdf.

170 Supra at 95 – Invercargill City Council and Southland District Council. Local Alcohol Policy 2019. Available from: https://icc.govt.nz/wp-content/uploads/2020/04/2020-03-31-Operative-Combined-Local-Alcohol-Policy-2019.pdf.

171 Clause 4.4.2 Waikato District Council Local Alcohol Policy 2017 providing for a minimum distance to residential dwellings (*et al*) for on-licences. Supra at 85 – Waikato District Council. Local Alcohol Policy 2017. Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy-2017.pdf?sfvrsn=8522bbc9_4

172 Supra at 87 – Waipā District Council. Local Alcohol Policy 2016. Available from: https://www.waipadc.govt.nz/repository/libraries/id:26zgz4o7s1cxbyk7hfo7/hierarchy/our-council/haveyoursay/recentlyclosedconsultations/provisionallocalalcoholpolicy/documents/Local%20Alcohol%20Policy%20FINAL%20adopted.pdf. The 2016 LAP has been reviewed in 2024. See Waipā District Council. Waipā's alcohol policy and bylaw review. Available at https://haveyoursay.waipadc.govt.nz/waipas-local-alcohol-policy.

173 Supra at 88 – Waitomo District Council. Local Alcohol Policy 2022. Available from: https://www.waitomo.govt.nz/media/stfecmkv/provisional-local-alcohol-policy-2022.pdf.

174 Note that the restrictions on the location of bottles stores in Te Kauwhata, Tuakau and Pōkeno in clause 5.4.1 of the 2017 LAP have not carried over to the 2022 PLAP. Supra at 85 – Waikato District Council. Local Alcohol Policy 2017. Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy-2017.pdf?sfvrsn=8522bbc9_4.

175 Supra at 155 – see Gisborne District Council Local. Alcohol Policy 2024. Available from: https://www.gdc.govt.nz/services/alcohol-and-food/local-alcohol-policy.

176 Supra at 68 – Porirua City Council. Local Alcohol Policy 2017. Available from: https://storage.googleapis.com/pcc-wagtail-media/documents/Local_Alcohol_Policy_2017.pdf.

177 Supra at 115 – Hauraki District Council's Local Alcohol Policy 2022 prohibits further off-licences (excluding supermarkets and grocery stores) from locating within 50 metres of the boundary of a school, early childhood education centre, or Council administered playground (Policy 4.2.2). Hauraki District Council. Local Alcohol Policy 2022. Available from: https://www.hauraki-dc.govt.nz/repository/libraries/id:2jpo4nuxg17q9srdjc4b/hierarchy/Policies/Local-Alcohol-Policy-2022.pdf.

178 Supra at 82 – New Plymouth District Council and Stratford District Council. Local Alcohol Policy 2017. Available from: https://www.npdc.govt.nz/media/45ukjowv/local-alcohol-policy.pdf.

179 Supra at 82 – New Plymouth District Council and Stratford District Council. Local Alcohol Policy 2017. Available from: https://www.npdc.govt.nz/media/45ukjowv/local-alcohol-policy.pdf.

180 Supra at 68 – Porirua City Council. Local Alcohol Policy 2017. Available from: https://storage.googleapis.com/pcc-wagtail-media/documents/Local_Alcohol_Policy_2017.pdf.

181 Supra at 160 – Wairoa District Council. Local Alcohol Policy 2020. Available from: https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf.

182 Supra at 56 – Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109.

183 Ruapehu District Council. Local Alcohol Policy 2018. Available from: https://www.ruapehudc.govt.nz/repository/libraries/id:2dyphjrmg1cxby6Strfv/hierarchy/sitecollectiondocuments/policies-and-bylaws/policies/alcohol/Local%20Alcohol%20Policy%202018.pdf.

184 Supra at 78 – Wairarapa Local Alcohol Policy 2018 (Carterton District Council, Masterton District Council, South Wairarapa District Council). Available from: https://swdc.govt.nz/wp-content/uploads/Wairarapa%20%20Local%20Alcohol%20Policy_Adopted_03Aug2018_0.pdf.

185 Supra at 118 – Ōtorohanga District Council. Local Alcohol Policy 2016. Available from: https://www.otodc.govt.nz/media/dtjehhbg/lapp-final.pdf. See also Ōtorohanga District Council. Local Alcohol Policy 2024 (in force 28 October 2024). Available from: https://www.otodc.govt.nz/assets/Documents/Policies/Local-Alcohol-Policy-final-24-September-2024.pdf

186 Supra at 85 – Waikato District Council. Local Alcohol Policy 2017. Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy-2017.pdf?sfvrsn=8522bbc9_4.

187 Supra at 87 – Waipā District Council. Local Alcohol Policy 2016. Available from: https://www.waipadc.govt.nz/repository/libraries/id:26zgz4o7s1cxbyk7hfo7/hierarchy/our-council/haveyoursay/recentlyclosedconsultations/provisionallocalalcoholpolicy/documents/Local%20Alcohol%20Policy%20FINAL%20adopted.pdf. The 2016 LAP has been reviewed in 2024. See Waipā District Council. Waipā's alcohol policy and bylaw review. Available at https://haveyoursay.waipadc.govt.nz/waipas-local-alcohol-policy.

188 Supra at 88 – Waitomo District Council. Local Alcohol Policy 2022. Available from: https://www.waitomo.govt.nz/media/stfecmkv/provisional-local-alcohol-policy-2022.pdf.

189 Supra at 71 – Rotorua Lakes Council. Local Alcohol Policy 2019. Available from: https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/our-council/policiesandbylaws/bylaws/Adopted-Local-Alcohol-Policy-18-February-2019-signed-copy.pdf.

190 Sinking lid policies are applied to gaming machines in class 4 venues, or in TA policies that cap the number of TAB venues. See for example Auckland Council TAB Venue Policy, July 2013 that caps TAB venues to 43, the status quo before the adoption of the policy. Available from: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/Documents/new-zealand-racing-board-tab-venue-policy.pdf,

191 Supra at 2 – New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

192 Randerson, S, Gordon, L, Casswell, S, Lin, J, Borell, B, Rychert, M, & Huckle, T. *"I feel it's unsafe to walk": Impacts of alcohol supply on public space in eight neighbourhoods, and residents' input to alcohol licensing decisions*. Health New Zealand | Te Whatu Ora. 2022 Available from: https://resources.alcohol.org.nz/assets/Inclusivity-report/Inclusivity-report.PDF.

193 Counties Manukau Health Alcohol-Related Harm Profile. 2018. Available from: https://countiesmanukau.health.nz/assets/About-CMH/Performance-and-planning/health-status/729b26e0a4/20180710-CMH-Alcohol-Related-Harm-Profile.pdf

194 Cameron M P, Cochrane W, Gordon C, Livingston M. Alcohol outlet density and violence: A geographically weighted regression approach [Internet]. *Drug and alcohol review*. 2016;35(3):280-8. Available from: https://doi.org/10.1111/dar.12295

195 Day P, Breetzke G, Kingham S, Campbell M. Close proximity to alcohol outlets is associated with increased serious violent crime in New Zealand [Internet]. *Australian and New Zealand journal of public health*. 2012;36(1):48-54. Available from: https://www.sciencedirect.com/science/article/pii/S1326020023017181?via%3Dihub

196 Campbell CA, Hahn RA, Elder R, Brewer R, Chattopadhyay S, Fielding J, Naimi TS, Toomey T, Lawrence B, Middleton JC, Task Force on Community Preventive Services. The effectiveness of limiting alcohol outlet density as a means of reducing excessive alcohol consumption and alcohol-related harms [Internet]. *American journal of preventive medicine*. 2009;37(6):556-69. Available from: https://doi.org/10.1016/j.amepre.2009.09.028

197 Sherk A, Stockwell T, Chikritzhs T, Andréasson S, Angus C, Gripenberg J, Holder H, Holmes J, Mäkelä P, Mills M, Norström T. Alcohol consumption and the physical availability of take-away alcohol: systematic reviews and meta-analyses of the days and hours of sale and outlet density [Internet]. *Journal of Studies on Alcohol and Drugs*. 2018;79(1):58-67. Available from: https://doi.org/10.15288/jsad.2018.79.58

198 Livingston M, Chikritzhs T, Room R. Changing the density of alcohol outlets to reduce alcohol-related problems [Internet]. *Drug and alcohol review*. 2007 Sep;26(5):557-66. Available from: https://doi.org/10.1080/09595230701499191

199 Supra at 97 – Cameron MP, Cochrane W, McNeill K, Melbourne P, Morrison SL, Robertson N. *The Impacts of Liquor Outlets in Manukau City Report No. 3: The spatial and other characteristics of liquor outlets in Manukau City* [Internet]. Wellington: Alcohol Advisory Council of New Zealand; 2012. Available from: https://www.hpa.org.nz/sites/default/files/imported/field_research_publication_file/ManukauReportSummaryREVISED.PDF

200 Morrison C, Ponicki WR, Smith K. Social disadvantage and exposure to lower priced alcohol in off-premise outlets [Internet]. *Drug and alcohol review*. 2015;34(4):375-8. Available from: https://doi.org/10.1111/dar.12256

201 Shortt NK, Tisch C, Pearce J, *et al*. A cross-sectional analysis of the relationship between tobacco and alcohol outlet density and neighbourhood deprivation. *BMC public health* 2015; 1: 1014. Available from: https://doi.org/10.1186/s12889-015-2321-1.

202 Supra at 198 – Livingston M, Chikritzhs T, Room R. Changing the density of alcohol outlets to reduce alcohol-related problems [Internet]. *Drug and alcohol review*. 2007 Sep;26(5):557-66. Available from: https://doi.org/10.1080/09595230701499191

203 Supra at 30 – Cameron MP, Cochrane W, Gordon C, Livingston M. *The locally-specific impacts of alcohol outlet density in the North Island of New Zealand* [Internet]. Wellington: Health Promotion Agency; 2013. Available from: https://www.hpa.org.nz/sites/default/files/Alcohol%20Outlet%20Density.pdf

204 Supra at 109 – Cameron M, Cochrane W, Livingston M. *The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand, 2007-2014* [Internet]. Wellington: Health Promotion Agency; 2019. Available from: https://apo.org.au/sites/default/files/resource-files/2019-10/apo-nid264526.pdf

205 Supra at 111– Connor JL, Kypri K, Bell ML, Cousins K. Alcohol outlet density, levels of drinking and alcohol-related harm in New Zealand: a national study [Internet]. *J Epidemiol Community Health*. 2011;65(10):841-6. Available from: https://jech.bmj.com/content/65/10/841.short

206 Supra at 194 – Cameron M P, Cochrane W, Gordon C, Livingston M. Alcohol outlet density and violence: A geographically weighted regression approach [Internet]. *Drug and alcohol review.* 2016;35(3):280-8. Available from: https://doi.org/10.1111/dar.12295

207 Supra at 195 – Day P, Breetzke G, Kingham S, Campbell M. Close proximity to alcohol outlets is associated with increased serious violent crime in New Zealand [Internet]. *Australian and New Zealand journal of public health.* 2012;36(1):48-54. Available from: https://www.sciencedirect.com/science/article/pii/S1326020023017181?via%3Dihub

208 Cameron MP, Cochrane W, McNeill K, Melbourne P, Morrison SL, Robertson N. Alcohol outlet density is related to police events and motor vehicle accidents in Manukau City, New Zealand [Internet]. *Australian and New Zealand journal of public health.* 2012;36(6):537-42. Available from: https://doi.org/10.1111/j.1753-6405.2012.00935.x

209 Supra at 128 – Kypri K, Bell ML, Hay GC, Baxter J. Alcohol outlet density and university student drinking: a national study [Internet]. *Addiction.* 2008;103(7):1131-8. Available from: https://doi.org/10.1111/j.1360-0443.2008.02239.x

210 Supra at 109 – Cameron M, Cochrane W, Livingston M. *The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand, 2007-2014* [Internet]. Wellington: Health Promotion Agency; 2019. Available from: https://apo.org.au/sites/default/files/resource-files/2019-10/apo-nid264526.pdf

211 Supra at 109 – Cameron M, Cochrane W, Livingston M. *The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand, 2007-2014* [Internet]. Wellington: Health Promotion Agency; 2019. Available from: https://apo.org.au/sites/default/files/resource-files/2019-10/apo-nid264526.pdf

212 Supra at 18 = Hobbs M, Marek L, Wiki J, Campbell M, Deng BY, Sharpe H, McCarthy J, Kingham S. Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand. *Health & Place.* 2020; 65:1-7. Available from: https://doi.org/10.1016/j.healthplace.2020.102397.

213 Ministry of Health. Annual Update of Key Results 2021/22: New Zealand Health Survey [Internet]. Wellington: New Zealand Government. 2022, Nov 17. Available from: https://www.health.govt.nz/publication/annual-update-key-results-2021-22-new-zealand-health-survey

214 Supra at 44 = Aron A. & Allen K. *Public attitudes on policy interventions to reduce alcohol harm: Results from the 2019/20 Alcohol Use in New Zealand Survey* (AUiNZ). Wellington: Te Hiringa Hauora – Health Promotion Agency; 2021. Available from: https://www.hpa.org.nz/sites/default/files/Alcohol%20Use%20in%20NZ%20Survey%20%28AUiNZ%29%20Support%20for%20policy%20interventions.pdf.

215 For example, the Waikato DHB Population Health advocated for Hauraki District Council to cap the number of alcohol licences granted at its current level. Furthermore, Population Health advised that if future licences in high deprivation areas are cancelled or lapse, that they are renewed only in areas of lower deprivation. This was supported by the Police. Refer Hauraki District Council Local Alcohol Policy Research Document, 2013, page 54 and see Wairoa District Council Local Alcohol Policy Background Paper, June 2018 page 23. Available from: https://www.consultations.nz/assets/Uploads/Background-Paper.pdf.

216 Liang W, Chikritzhs T. Revealing the link between licensed outlets and violence: counting venues versus measuring alcohol availability [Internet]. *Drug and alcohol review.* 2011;30(5):524-35. Available from: https://doi.org/10.1111/j.1465-3362.2010.00281.x

217 Supra at 115 = Hauraki District Council. Local Alcohol Policy 2022. Available from: https://www.hauraki-dc.govt.nz/repository/libraries/id:2jpo4nuxg17q9srdjc4b/hierarchy/Policies/Local-Alcohol-Policy-2022.pdf.

218 Supra at 94 = Hutt City Council. Local Alcohol Policy 2018. Available from: https://hccpublicdocs.azurewebsites.net/api/download/dca10d32fed24fb48c89a051398ef73e/_CM9-WE/ee1dd1b9188726e48e09e7e4f986c255c21.

219 Supra at 85 = Waikato District Council. Local Alcohol Policy 2017. Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy-2017.pdf?sfvrsn=8522bbc9_4. Note that Waikato District Council Provisional Local Alcohol Policy 2022 (under appeal) has amended clause 5.5.1 and replaced the cap provision with a presumption against new bottle stores in Tuakau, Te Kauwhata, Huntley, Ngāruawāhia and Raglan and other districts where the deprivation level is 7 or higher. Supra at 85 = Waikato District Council Provisional Local Alcohol Policy. Available from: https://hdp-au-prod-app-waik-shape-files.s3.ap-southeast-2.amazonaws.com/8716/6560/5117/Provisional_Local_Alcohol_Policy_2022.pdf.

220 Supra at 56 = Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109.

221 Supra at 115 = Hauraki District Council. Local Alcohol Policy 2022. Available from: https://www.hauraki-dc.govt.nz/repository/libraries/id:2jpo4nuxg17q9srdjc4b/hierarchy/Policies/Local-Alcohol-Policy-2022.pdf.

222 Supra at 81 = Matamata-Piako District Council. Local Alcohol Policy 2023. Available from: https://www.mpdc.govt.nz/filelink/fileman-files/News/HaveYourSay/2023-24%20Policies/LocalAlcoholPolicy2023%20(1).pdf

223 Supra at 92 = Hastings District Council and Napier City Council. Local Alcohol Policy 2019. Available from: https://www.hastingsdc.govt.nz/assets/Document-Library/Policies/Liquor-Licensing-Policy/Local-Alcohol-Policy.pdf.

224 Supra at 92 = Hastings District Council and Napier City Council. Local Alcohol Policy 2019. Available from: https://www.hastingsdc.govt.nz/assets/Document-Library/Policies/Liquor-Licensing-Policy/Local-Alcohol-Policy.pdf.

225 Supra at 50 = Western Bay of Plenty District Council. Local Alcohol Policy 2022. Available from: https://www.westernbay.govt.nz/repository/libraries/id:25p4fe6mo17q9stw0v5w/hierarchy/rules-regulations-licenses/bylaws-and-policies/documents/2022-05-27%20-%20Adopted%20Local%20Alcohol%20Policy%20-%20PDF.pdf.

226 Supra at 82 – New Plymouth District Council and Stratford District Council. Local Alcohol Policy 2017. Available from: https://www.npdc.govt.nz/media/45ukjowv/local-alcohol-policy.pdf.

227 Supra at 80 = Horowhenua District Council. Local Alcohol Policy 2020. Available from: https://www.horowhenua.govt.nz/Council/Local-Bylaws-Policies/Local-Alcohol-Policy.

228 Supra at 160 = Wairoa District Council. Local Alcohol Policy 2020. Available from: https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf.

229 Supra at 80 = Horowhenua District Council. Local Alcohol Policy 2020. Available from: https://www.horowhenua.govt.nz/Council/Local-Bylaws-Policies/Local-Alcohol-Policy.

230 Supra at 56 = Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109.

231 Supra at 160 = Wairoa District Council. Local Alcohol Policy 2020. Available from: https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf.

232 Supra at 80 = Horowhenua District Council. Local Alcohol Policy 2020. Available from: https://www.horowhenua.govt.nz/Council/Local-Bylaws-Policies/Local-Alcohol-Policy.

233 Supra at 82 = New Plymouth District Council and Stratford District Council. Local Alcohol Policy 2017. Available from: https://www.npdc.govt.nz/media/45ukjowv/local-alcohol-policy.pdf.

234 Supra at 80 = Horowhenua District Council. Local Alcohol Policy 2020. Available from: https://www.horowhenua.govt.nz/Council/Local-Bylaws-Policies/Local-Alcohol-Policy.

235 Supra at 56 = Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109.

236 Supra at 37 = Auckland Council. Provisional Auckland Council Local Alcohol Policy: Kaupapa Māhere ā-Takiwā mot te Waipiro May 2015 (amended September 2017, in force 2024). Auckland: Auckland Council; 2015. Available from: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/Documents/provisional-lap-amended.pdf. Note that Auckland Council's PLAP was adopted in May 2015 and elements appealed by the supermarket duopoly (Woolworths New Zealand Limited and Foodstuffs North Island Limited) to the Supreme Court whose judgment was released on 5 May 2023. Appeals continued at ARLA and on 29 August 2024, Auckland Council's Governing Body voted to have the LAP come into force on 16 September and 9 December 2024.

237 See for example Auckland Council Provisional Local Alcohol Policy and "city centre" and "priority overlay" areas supra at 37 = Auckland Council. Provisional Auckland Council Local Alcohol Policy: Kaupapa Māhere ā-Takiwā mo te Waipiro May 2015 (amended September 2017, LAP in force 2024). Auckland: Auckland Council; 2015. Available from: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/Documents/provisional-lap-amended.pdf

238 Section 90 (2)(a) of the Act states that, in relation to a local alcohol policy or an amendment of a local alcohol policy where it applies to maximum trading hours (or one-way door restrictions) "the element or elements (or modification or modifications) ... must not be brought into effect ... on a day earlier than the day 3 months after the day on which public notice of its adoption was given.

239 Note that the trading hours provisions in LAPs have by and large, superseded those district plan rules that had imposed *de facto* maximum trading hours related to activities and environmental amenity (such as noise) before these were set through the Act. Refer section 93 of the Act.

240 Supra at 2 = New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

241 The "sacrosanct" days at Easter were the subject of Chris Baillie's Member's Bill that would ease the current restrictions and remove the default restriction on the sale and supply of alcohol on Good Friday and Easter Sunday. While the Repeal of Good Friday and Easter Sunday as Restricted Trading Days (Shop Trading and Sale of Alcohol) Amendment Bill (130-1) did not progress beyond the first reading on 3 August 2022, ACT MP Cameron Luxton has signalled that he will endeavour to sponsor this same bill. The 2022 bill is available from: https://www.legislation.govt.nz/bill/member/2022/0130/latest/whole.html and see https://www.thepress.co.nz/business/350149128/old-fashioned-easter-trading-restrictions-need-end-act. See also Sale and Supply of Alcohol (Exemption for Race Meetings) Amendment Act 2023 (Ian McKelvie's Member's Bill) that amended section 235 of the Sale and Supply of Alcohol Act 2012 providing an exemption for certain race meetings. Available from: https://www.legislation.govt.nz/bill/member/2021/0089/latest/LMS577505.html#LMS577504

242 Sale and Supply of Alcohol (Rugby World Cup 2023 Extended Trading Hours) Amendment Act. Available from: https://legislation.govt.nz/bill/government/2023/0259/latest/whole.html?search=ad_act%40bill___2023_259__25_ac%40bc%40rn%40dn%40apub%40aloc%40apri%40apro%40aimp%40bgov%40bloc%40bpri%40bmem%40rpub%40rimp_c%40bc%40ainf%40anif%40bcur%40rinf%40rnif_a_aw_se_&p=1.

243 Supra at 52 = Office of the Minister of Justice (2010), *Alcohol Law Reform*, response to DOM Min (10) 8/1, 20.

244 Supra at 2 = New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

245 Nepal S, Kypri K, Tekelab T, Hodder RK, Attia J, Bagade T, Chikritzhs T, Miller P. Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review [Internet]. *Journal of Studies on Alcohol and Drugs*. 2020;81(1):5-23. Available from: https://doi.org/10.15288/jsad.2020.81.5

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. Available from: https://doi.org/10.1111/acer.12359

247 Taylor N, Livingston M, Coomber K, Mayshak R, Zahnow R, Ferris J, Chikritzhs T, Miller P. The combined impact of higher-risk on-licence venue outlet density and trading hours on serious assaults in night-time entertainment precincts [Internet]. *Drug and Alcohol Dependence*. 2021;223:108720. Available from: https://doi.org/10.1016/j.drugalcdep.2021.108720

248 Graham K, Wells S, West P. A framework for applying explanations of alcohol-related aggression to naturally occurring aggressive behavior [Internet]. Contemporary drug problems. 1997;24(4):625-66. Available from: https://doi.org/10.1177/009145099702400402

249 Kuo FE, Sullivan WC. Aggression and violence in the inner city: Effects of environment via mental fatigue [Internet]. *Environment and behavior*. 2001;33(4):543-71. Available from: *https://doi.org/10.1177/00139160121973124*. It is believed that mental fatigue may contribute to aggression due to its effects on cognitive processing involved in managing social situations, especially potential conflicts.

250 Connor J, Maclennan B, Huckle T, Romeo J, Davie G, Kypri K. Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data [Internet]. *Addiction*. 2021;116(4):788-98. https://doi.org/10.1111/add.15206

251 Sanchez-Ramirez DC, Voaklander D. The impact of policies regulating alcohol trading hours and days on specific alcohol-related harms: a systematic review [Internet]. *Injury prevention*. 2018;24(1):94-100. Available from: https://injuryprevention.bmj.com/content/24/1/94

252 World Health Organization. *WHO Expert Committee on Problems Related to Alcohol Consumption* [Internet]. Geneva: World Health Organzation; 2007. Technical Report Series No.: 944. Available from: https://iris.who.int/bitstream/handle/10665/43670/9789241209441_eng.pdf?isAllowed=y&sequence=1

253 Tyler-Harwood L, Menclova AK. Local Alcohol Policies in New Zealand: An overview of their implementation and effects on crime [Internet]. *Policy Quarterly*. 2021;17(4):73-9. Available from: https://doi.org/10.26686/pq.v17i4.7325

254 Babor TF, Casswell S, Graham K, Huckle T, Livingston M, Österberg E, Rehm J, Room R, Rossow I, Sornpaisarn B. *Alcohol: No ordinary commodity: Research and public policy*. Oxford: Oxford University Press; 2022.

255 Supra at 19 = Market Economics Limited (M.E. Consulting). New Zealand Alcohol Supply and Demand Structures: Research report. Wellington: Health Promotion Agency, 2018. Available from: https://www.hpa.org.nz/sites/default/files/NZ%20Alcohol%20Supply%20and%20Demand%20Structure%20Research%20Report%20FEB2018-Final.PDF

256 McBride-Henry K, Lui SM, Woods L, Officer TN. Consumer alcohol exposure in supermarkets: legislatively adherent, but a societal problem. *Australian and New Zealand journal of public health*. 2020;44(1)22-27. Available from: https://doi.org/10.1111/1753-6405.12963.

257 Supra at 19 = Market Economics Limited (M.E. Consulting). New Zealand Alcohol Supply and Demand Structures: Research report. Wellington: Health Promotion Agency, 2018. Available from: https://www.hpa.org.nz/sites/default/files/NZ%20Alcohol%20Supply%20and%20Demand%20Structure%20Research%20Report%20FEB2018-Final.PDF

258 Supra at 109 = Cameron M, Cochrane W, Livingston M. The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand, 2007-2014 [Internet]. Wellington: Health Promotion Agency; 2019. Available from: https://apo.org.au/sites/default/files/resource-files/2019-10/apo-nid264526.pdf

259 Huckle T, Callinan S, Pham C, Chaiyasong S, Parker K, Casswell S. Harmful drinking occurs in private homes in some high-and middle-income alcohol markets: data from the international alcohol control study [Internet]. *Drug and alcohol review*. 2020;39(6):616-23. Available from: https://doi.org/10.1111/dar.13137

260 Hahn RA, Kuzara JL, Elder R, Brewer R, Chattopadhyay S, Fielding J, Naimi TS, Toomey T, Middleton JC, Lawrence B, Task Force on Community Preventive Services. Effectiveness of policies restricting hours of alcohol sales in preventing excessive alcohol consumption and related harms [Internet]. *American journal of preventive medicine*. 2010;39(6):590-604. Available from: https://doi.org/10.1016/j.amepre.2010.09.016

261 Supra at 2 = New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

262 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. Available from: https://doi.org/10.1111/acer.12359

263 Supra at 250 = Connor J, Maclennan B, Huckle T, Romeo J, Davie G, Kypri K. Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data [Internet]. *Addiction*. 2021;116(4):788-98. https://doi.org/10.1111/add.15206

264 Supra at 250 = Connor J, Maclennan B, Huckle T, Romeo J, Davie G, Kypri K. Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data [Internet]. *Addiction*. 2021;116(4):788-98. https://doi.org/10.1111/add.15206

265 Wicki M, Gmel G. Hospital admission rates for alcoholic intoxication after policy changes in the canton of Geneva, Switzerland [Internet]. *Drug and Alcohol Dependence*. 2011;118(2-3):209-15. Available from: https://doi.org/10.1016/j.drugalcdep.2011.03.020

266 Wicki M, Bertholet N, Gmel G. Estimated changes in hospital admissions for alcohol intoxication after partial bans on off-premises sales of alcoholic beverages in the canton of Vaud, Switzerland: an interrupted time–series analysis [Internet]. *Addiction*. 2020 Aug;115(8):1459-69. Available from: https://doi.org/10.1111/add.14967

267 Marcus J, Siedler T. Reducing binge drinking? The effect of a ban on late-night off-premise alcohol sales on alcohol-related hospital stays in Germany [Internet]. *Journal of Public Economics*. 2015;123:55-77. Available from: https://doi.org/10.1016/j.jpubeco.2014.12.010

268 Scottish Parliament. Licensing (Scotland) Act 2005. Available from: https://www.legislation.gov.uk/asp/2005/16/pdfs/asp_20050016_en.pdf

269 The Houses of the Oireachtas-Tithe an Oireacchtais (Ireland). Intoxicating Liquor Act 2008 (Number17 of 2008). Available from: https://www.irishstatutebook.ie/eli/2008/act/17/enacted/en/pdf

270 Kolosnitsyna M, Sitdikov M, Khorkina N. Availability restrictions and alcohol consumption: A case of restricted hours of alcohol sales in Russian regions [Internet]. *International Journal of Alcohol and Drug Research*. 2014;3(3):193-201. Available from: https://doi.org/10.7895/ijadr.v3i3.154

271 Douglas M. Restriction of the hours of sale of alcohol in a small community: a beneficial impact [Internet]. *Australian and New Zealand journal of public health*. 1998;22(6):714-9. https://doi.org/10.1111/j.1467-842X.1998.tb01476.x

272 O'Brien KS. Commentary on Terry-Mcelrath & O'Malley (2011): Bad sport—exorcizing harmful substances and other problems [Internet]. *Addiction, 106*(10), 1866–1867. Available from: https://doi.org/10.1111/j.1360-0443.2011.03600.x

273 Teevale T, Robinson E, Duffy S, Utter J, Nosa V, Clark T, Sheridan J, Ameratunga S. Binge drinking and alcohol-related behaviours amongst Pacific youth: a national survey of secondary school students [Internet]. *The New Zealand Medical Journal* (Online). 2012;125(1352). Available from: https://www.asthmafoundation.org.nz/assets/documents/New-Zealand-evidence-for-the-impact-of-primary-healthcare-investment-in-Capital-and-Coast-District-Health-Board.pdf#page=60

274 Market Economics Limited. Restriction on Hours of Trade for Alcohol Licensees in Auckland: Economic Impact Assessment prepared for Auckland. 2013. Available from: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/localalcoholkeydocuments/economicimpactassessmentphase1.pdf.

275 Dunedin City Council. Local Alcohol Policy 2019. Available from: https://www.dunedin.govt.nz/__data/assets/pdf_file/0007/682891/Dunedins-Local-Alcohol-Policy.pdf.

276 Supra at 87 = Waipā District Council. Local Alcohol Policy 2016. Available from: https://www.waipadc.govt.nz/repository/libraries/id:26zgz4o7s1cxbyk7hfo7/hierarchy/our-council/haveyoursay/recentlyclosedconsultations/provisionallocalalcoholpolicy/documents/Local%20Alcohol%20Policy%20FINAL%20adopted.pdf. The 2016 LAP has been reviewed in 2024. See Waipā District Council. Waipā's alcohol policy and bylaw review. Available at https://haveyoursay.waipadc.govt.nz/waipas-local-alcohol-policy.

277 Supra at 88 = Waitomo District Council. Local Alcohol Policy 2022. Available from: https://www.waitomo.govt.nz/media/stfecmkv/provisional-local-alcohol-policy-2022.pdf.

278 Supra at 275 = Dunedin City Council. Local Alcohol Policy 2019. Available from: https://www.dunedin.govt.nz/__data/assets/pdf_file/0007/682891/Dunedins-Local-Alcohol-Policy.pdf

279 Supra at 86 = Waimakariri District Council. Local Alcohol Policy 2018. Available from: https://www.waimakariri.govt.nz/__data/assets/pdf_file/0013/120622/Local-Alcohol-Policy-20181217.pdf.

280 Supra at 94 = Hutt City Council. Local Alcohol Policy 2018. Available from: https://hccpublicdocs.azurewebsites.net/api/download/dca10d32fed24fb48c89a051398ef73e/_CM9-WE/ee1dd1b9188726e48e09e7e4f986c255c21.

281 Supra at 79 = Central Hawke's Bay District Council. Local Alcohol Policy 2018. Available from: https://www.chbdc.govt.nz/assets/Uploads/20180925-FINAL-FOR-PUBLIC-Local-Alcohol-Policy-2018.pdf.

282 Supra at 48 = Gore District Council. Local Alcohol Policy 2020. Available from: https://www.goredc.govt.nz/repository/libraries/id:2buwl3j7c17q9srz9ase/hierarchy/Your%20Council/Documents/Plans%2C%20policies%20and%20bylaws/Bylaws%20and%20Policies/Main/Local%20Alcohol%20Policy%202020.

283 Supra at 95 = Invercargill City Council and Southland District Council. Local Alcohol Policy 2019. Available from: https://icc.govt.nz/wp-content/uploads/2020/04/2020-03-31-Operative-Combined-Local-Alcohol-Policy-2019.pdf.

284 Supra at 95 = Invercargill City Council and Southland District Council. Local Alcohol Policy 2019. Available from: https://icc.govt.nz/wp-content/uploads/2020/04/2020-03-31-Operative-Combined-Local-Alcohol-Policy-2019.pdf.

285 Supra at 90 = Kawerau District Council, Whakatāne District Council and Ōpotiki District Council. Eastern Bay of Plenty LAP 2016. Available from: https://www.kaweraudc.govt.nz/files/documents/ebop_lap_amended_final_0.pdf. See also: Kawerau District Council, Whakatāne District Council and Ōpotiki District Council. Eastern Bay of Plenty Provisional LAP 2023. Available from: https://www.odc.govt.nz/repository/libraries/id:2bpcqtp1b1cxby3k9b0b/hierarchy/sitecollectiondocuments/our-council/Have%20your%20Say/LAP%20Review%202023/Provisional%20Eastern%20Bay%20of%20Plenty%20Local%20Alcohol%20Policy.pdf.

286 Supra at 90 = Kawerau District Council, Whakatāne District Council and Ōpotiki District Council. Eastern Bay of Plenty LAP 2016. Available from: https://www.kaweraudc.govt.nz/files/documents/ebop_lap_amended_final_0.pdf. See also: Kawerau District Council, Whakatāne District Council and Ōpotiki District Council. Eastern Bay of Plenty Provisional LAP 2023. Available from: https://www.odc.govt.nz/repository/libraries/id:2bpcqtp1b1cxby3k9b0b/hierarchy/sitecollectiondocuments/our-council/Have%20your%20Say/LAP%20Review%202023/Provisional%20Eastern%20Bay%20of%20Plenty%20Local%20Alcohol%20Policy.pdf.

287 Kaikōura District Council. Local Alcohol Policy. Available from: https://www.kaikoura.govt.nz/repository/libraries/id:2i17fvyhr17q9scmy0d8/hierarchy/Rules%2C%20Regulations%20and%20Licences/Alcohol%20Licensing/Final-Local-Alcohol-Policy-2020-signed.pdf.

288 Supra at 183 = Ruapehu District Council. Local Alcohol Policy 2018. Available from: https://www.ruapehudc.govt.nz/repository/libraries/id:2dyphjrmg1cxby65trfv/hierarchy/sitecollectiondocuments/policies-and-bylaws/policies/alcohol/Local%20Alcohol%20Policy%202018.pdf

289 Supra at 79 = Central Hawke's Bay District Council. Local Alcohol Policy 2018. Available from: https://www.chbdc.govt.nz/assets/Uploads/20180925-FINAL-FOR-PUBLIC-Local-Alcohol-Policy-2018.pdf.

290 Supra at 92 = Hastings District Council and Napier City Council. Local Alcohol Policy 2019. Available from: https://www.hastingsdc.govt.nz/assets/Document-Library/Policies/Liquor-Licensing-Policy/Local-Alcohol-Policy.pdf.

291 Supra at 160 = Wairoa District Council. Local Alcohol Policy 2020. Available from: https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf.

292 Supra at 109 = Cameron M, Cochrane W, Livingston M. The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand, 2007-2014 [Internet]. Wellington: Health Promotion Agency; 2019. Available from: https://apo.org.au/sites/default/files/resource-files/2019-10/apo-nid264526.pdf

293 Supra at 92 = Hastings District Council and Napier City Council. Local Alcohol Policy 2019. Available from: https://www.hastingsdc.govt.nz/assets/Document-Library/Policies/Liquor-Licensing-Policy/Local-Alcohol-Policy.pdf.

294 Supra at 183 = Ruapehu District Council. Local Alcohol Policy 2018. Available from: https://www.ruapehudc.govt.nz/repository/libraries/id:2dyphjrmg1cxby65trfv/hierarchy/sitecollectiondocuments/policies-and-bylaws/policies/alcohol/Local%20Alcohol%20Policy%202018.pdf

295 Supra at 81 = Matamata-Piako District Council. Local Alcohol Policy 2023. Available from: https://www.mpdc.govt.nz/filelink/fileman-files/News/HaveYourSay/2023-24%20Policies/LocalAlcoholPolicy2023%20(1).pdf

296 Supra at 115 = Hauraki District Council. Local Alcohol Policy 2022. Available from: https://www.hauraki-dc.govt.nz/repository/libraries/id:2jpo4nuxg17q9srdjc4b/hierarchy/Policies/Local-Alcohol-Policy-2022.pdf.

297 Supra at 83 = Selwyn District Council. Local Alcohol Policy 2017. Available from: https://www.selwyn.govt.nz/__data/assets/pdf_file/0017/220166/Adopted-LAP.pdf.

298 Thames-Coromandel District Counci. Local Alcohol Policy 2016 (reviewed 2022). Available from: https://www.tcdc.govt.nz/files/assets/public/v/1/our-council/policies/adopted-local-alcohol-policy.pdf.

299 Supra at 86 = Waimakariri District Council. Local Alcohol Policy 2018. Available from: https://www.waimakariri.govt.nz/__data/assets/pdf_file/0013/120622/Local-Alcohol-Policy-20181217.pdf.

300 Supra at 90 = Kawerau District Council, Whakatāne District Council and Ōpotiki District Council. Eastern Bay of Plenty LAP 2016. Available from: https://www.kaweraudc.govt.nz/files/documents/ebop_lap_amended_final_0.pdf. See also: Kawerau District Council, Whakatāne District Council and Ōpotiki District Council. Eastern Bay of Plenty Provisional LAP 2023. Available from: https://www.odc.govt.nz/repository/libraries/id:2bpcqtp1b1cxby3k9b0b/hierarchy/sitecollectiondocuments/our-council/Have%20your%20Say/LAP%20Review%202023/Provisional%20Eastern%20Bay%20of%20Plenty%20Local%20Alcohol%20Policy.pdf.

301 Supra at 83 = Selwyn District Council. Local Alcohol Policy 2017. Available from: https://www.selwyn.govt.nz/__data/assets/pdf_file/0017/220166/Adopted-LAP.pdf. with an earlier opening time for ski field clubs.

302 Supra at 94 = Hutt City Council. Local Alcohol Policy 2018. Available from: https://hccpublicdocs.azurewebsites.net/api/download/dca10d32fed24fb48c89a051398ef73e/_CM9-WE/ee1dd1b9188726e48e09e7e4f986c255c21.

303 Ashburton District Council. Local Alcohol Policy 2023. Available from www.ashburtondc.govt.nz/__data/assets/pdf_file/0013/4810/Local-Alcohol-Policy-2023-final.pdf.

304 Supra at 78 = Wairarapa Local Alcohol Policy 2018 (Carterton District Council, Masterton District Council, South Wairarapa District Council). Available from: https://swdc.govt.nz/wp-content/uploads/Wairarapa%20%20Local%20Alcohol%20Policy_Adopted_03Aug2018_0.pdf.

305 Supra at 95 = Invercargill City Council and Southland District Council. Local Alcohol Policy 2019. Available from: https://icc.govt.nz/wp-content/uploads/2020/04/2020-03-31-Operative-Combined-Local-Alcohol-Policy-2019.pdf.

306 Supra at 56 = Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109

307 Supra at 155 – see Gisborne District Council Local. Alcohol Policy 2024. Available from: https://www.gdc.govt.nz/services/alcohol-and-food/local-alcohol-policy.

308 Supra at 287 = Kaikōura District Council. Local Alcohol Policy 2020. Available from: https://www.kaikoura.govt.nz/repository/libraries/id:2i17fvyhr17q9scmy0d8/hierarchy/Rules%2C%20Regulations%20and%20Licences/Alcohol%20Licensing/Final-Local-Alcohol-Policy-2020-signed.pdf.

309 Supra at 160 = Wairoa District Council. Local Alcohol Policy 2020. Available from: https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf.

310 Health Promotion Agency. *Safer bottle stores – a guide to Crime Prevention through Environmental Design* (CPTED) [Internet]. Wellington: Health New Zealand | Te Whatu Ora; 2019. Available from: https://resources.alcohol.org.nz/resources-research/alcohol-resources/research-and-publications/safer-bottle-stores-a-guide-to-crime-prevention-through-environmental-design-cpted/

311 Health Promotion Agency. *Safer bars and restaurants: A guide to Crime Prevention through Environmental Design* [Internet]. Wellington: Health New Zealand | Te Whatu Ora; 2019. Available from: https://resources.alcohol.org.nz/resources-research/alcohol-resources/research-and-publications/safer-bars-and-restaurants-a-guide-to-crime-prevention-through-environmental-design-cpted/

312 Supra at 2 = New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf

313 Alcohol Healthwatch. Cheap drinks: An exploratory audit of alcohol prices at off-licences across Tāmaki Makaurau / Auckland. 2021. Available from: https://www.ahw.org.nz/Portals/5/Resources/Documents-other/2021/Cheap%20Drinks%20Price_Audit_2021.pdf.

314 Parker RN, McCaffree KJ, Skiles D. The impact of retail practices on violence: The case of single serve alcohol beverage containers [Internet]. *Drug and alcohol review*. 2011;30(5):496-504. https://doi.org/10.1111/j.1465-3362.2011.00318.x

315 Masho SW, Bishop DL, Edmonds T, Farrell AD. Using surveillance data to inform community action: the effect of alcohol sale restrictions on intentional injury-related ambulance pickups [Internet]. *Prevention Science*. 2014;15(1):22-30. Available from: https://doi.org/10.1007/s11121-013-0373-y

316 Note also "fill-your-own" products where patrons bring their own vessels and have the filled at a reasonable price. See *Yankee Bourbon Co Limited* [2019] NZARLA 150 (500ml volume)

317 *St Joseph's School Pleasant Point v Singh Trading (2016) Limited* [2021] NZARLA 123; and see *Reed v Kaloti NZ Ltd* [2019] NZARLA 27.

318 Supra at 48 = Gore District Council. Local Alcohol Policy 2020. Available from: https://www.goredc.govt.nz/repository/libraries/id:2buwl3j7c17q9srz9ase/hierarchy/Your%20Council/Documents/Plans%2C%20policies%20and%20bylaws/Bylaws%20and%20Policies/Main/Local%20Alcohol%20Policy%202020.

319 Supra at 56 = Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109

320 Supra at 56 = Whanganui District Council. Local Alcohol Policy 2019. Available from: https://eplan.whanganui.govt.nz/bylaws/rules/0/16/0/2424/0/109 and see Supra at 308 = *Yankee Bourbon Co Limited* [2019] NZARLA 150.

321 Supra at 287 = Kaikōura District Council. Local Alcohol Policy 2020. Available from: https://www.kaikoura.govt.nz/repository/libraries/id:2i17fvyhr17q9scmy0d8/hierarchy/Rules%2C%20Regulations%20and%20Licences/Alcohol%20Licensing/Final-Local-Alcohol-Policy-2020-signed.pdf.

322 O'Brien L, Ramsay I, Ali P. Innovation, Disruption and Consumer Harm in the Buy Now Pay Later Industry: An Empirical Study. *University of New South Wales Law Journal*. 2024;47:2, 2024 (forthcoming), Available from: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4635958 .

323 Supra at 85 = Waikato District Council. Provisional Local Alcohol Policy 2022 (adopted 6 October 2022, awaiting the outcome of appeals). Available from: https://hdp-au-prod-app-waik-shape-files.s3.ap-southeast-2.amazonaws.com/8716/6560/5117/Provisional_Local_Alcohol_Policy_2022.pdf. See also: https://shape.waikatodistrict.govt.nz/local-alcohol-policy.

324 Supra at 22 = Sargent JD, Babor TF. The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs*, Supplement [Internet]. 2020;19:113-24. Available from: https://doi.org/10.15288/jsads.2020.s19.113

325 Swensen G. Public space and alcohol advertising: Exploratory study of the role of local government [Internet]. *International Journal of Alcohol and Drug Research.* 2016;5(3):117-23. Available from: https://doi.org/10.7895/ijadr.v5i3.224

326 Supra at 21 = Chambers T, Stanley J, Signal L, Pearson AL, Smith M, Barr M, Ni Mhurchu C. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol and Alcoholism.* 2018; 53(5):626-33. Available from: https://doi.org/10.1093/alcalc/agy053

327 Pasch KE, Komro KA, Perry CL, Hearst MO, Farbakhsh K. Outdoor alcohol advertising near schools: what does it advertise and how is it related to intentions and use of alcohol among young adolescents? [Internet]. *Journal of Studies on Alcohol and Drugs.* 2007;68(4):587-96. Available from: https://doi.org/10.15288/jsad.2007.68.587

328 Babor TF, Robaina K, Noel JK, Ritson EB. Vulnerability to alcohol-related problems: a policy brief with implications for the regulation of alcohol marketing [Internet]. *Addiction.* 2017;112:94-101. Available from: https://doi.org/10.1111/add.13626

329 Witteman J, Post H, Tarvainen M, de Bruijn A, Perna ED, Ramaekers JG, Wiers RW. Cue reactivity and its relation to craving and relapse in alcohol dependence: a combined laboratory and field study [Internet]. *Psychopharmacology.* 2015;232:3685-96. Available from: https://doi.org/10.1007/s00213-015-4027-6

330 Supra at 2 = New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf.

331 Supra at 309 = *St Joseph's School Pleasant Point v Singh Trading (2016) Limited* [2021] NZARLA 123

332 *Choice Liquor Mart. [2016] NZARLA PH 252. Available from:* https://forms.justice.govt.nz/search/Documents/ARLA/arla_DECN_108392565/ARLA_FULL.pdf

333 Auckland District Licensing Committee. Off-licence Premises External Advertising Practice Note. 21 July 2023. Available from: https://www.aucklandcouncil.govt.nz/licences-regulations/business-licences/alcohol-licences-fines/docsdlcpracticenotes/dlc-practice-note-external-signage.pdf.

334 Auckland Council. Regulatory and Safety Committee. Open Minutes. 27 June 2023 (Item 11). Available from: https://infocouncil.aucklandcouncil.govt.nz/Open/2023/06/20230627_RSCCC_MIN_11314.PDF.

335 Supra at 310 = Health Promotion Agency. *Safer bottle stores – a guide to Crime Prevention through Environmental Design* (CPTED) [Internet]. WellingtonHealth New Zealand | Te Whatu Ora; 2019. Available from: https://resources.alcohol.org.nz/resources-research/alcohol-resources/research-and-publications/safer-bottle-stores-a-guide-to-crime-prevention-through-environmental-design-cpted/

336 Supra at 79 = Central Hawke's Bay District Council. Local Alcohol Policy 2018. Available from: https://www.chbdc.govt.nz/assets/Uploads/20180925-FINAL-FOR-PUBLIC-Local-Alcohol-Policy-2018.pdf.

337 See *Foodstuffs North Island Limited and Liquorland Limited v Whanganui District Council* [2018] NZARLA PH 269-270 – appeal against clause 5.2.1 (single sales) of the Council's Provisional LAP. Also see Auckland Council [2017] NZARLA PH 27-34 – specifically clause 4.4.1(c) of the Provisional LAP (single sales).

338 Supra at 2 = New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf.

339 See the meaning of "one-way door restriction" in section 5 of the Act, and those "exempt persons" listed in section 5, including the licensee, staff, family, lodgers and tenants in the premises and their guests. Note also a one-way door restriction does not operate from 4 am to 1 pm on Anzac Day (section 47A(3) of the Act).

340 Examples include Melbourne Victoria, June to September 2008; Newcastle New South Wales, 2008; Sydney New South Wales, 2014; Queensland, 2016.

341 Kirkwood, L., Parsonage, P. *Evaluation of the Christchurch city one-way door intervention: final report.* Wellington, N.Z: Alcohol Advisory Council of New Zealand, 2008 https://www.hpa.org.nz/research-library/research-publications/evaluation-christchurch- city-one-way-door-intervention.

342 Twenty-five inner-city bars in Dunedin took part in a one-way door trial for three months in 2008 with the lockout from 4 am. This was initiated by the Alcohol Accord, and Police reported a reduction in disorder and crime, see Supra at 2 = New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf.

343 Cameron MP, Brown J, Cochrane W, Robertson N. *A mixed-methods evaluation of the one-way door and CitySafe patrol policies in Whangarei, New Zealand* [Internet]. Plos One. 2022;17(6):1-16. Available from: https://doi.org/10.1371/journal.pone.0270149

344 Nepal S, Kypri K, Pursey K, Attia J, Chikritzhs T, Miller P. Effectiveness of lockouts in reducing alcohol-related harm: systematic review [Internet]. *Drug and alcohol review.* 2018;37(4):527-36. Available from: https://doi.org/10.1111/dar.12699

345 Diab J, Moore MH. The impact of lockout laws on maxillofacial fractures in South Australia [Internet]. *Journal of Craniofacial Surgery.* 2022;33(4):1071-5. Available from: https://journals.lww.com/jcraniofacialsurgery/abstract/2022/06000/the_impact_of_lockout_laws_on_maxillofacial.21.aspx

346 Supra at 343 = Cameron MP, Brown J, Cochrane W, Robertson N. A mixed-methods evaluation of the one-way door and CitySafe patrol policies in Whangarei, New Zealand [Internet]. *Plos One.* 2022;17(6):1-16. Available from: https://doi.org/10.1371/journal.pone.0270149

347 Supra at 344 = Nepal S, Kypri K, Pursey K, Attia J, Chikritzhs T, Miller P. Effectiveness of lockouts in reducing alcohol-related harm: systematic review [Internet]. *Drug and alcohol review.* 2018;37(4):527-36. Available from: https://doi.org/10.1111/dar.12699

348 Supra at 303 = Ashburton District Council. Local Alcohol Policy. Available from www.ashburtondc.govt.nz/__data/assets/pdf_file/0013/4810/Local-Alcohol-Policy-2023-final.pdf.

349 Supra at 71 = Rotorua Lakes Council. Local Alcohol Policy 2019. Available from: https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/our-council/policiesandbylaws/bylaws/Adopted-Local-Alcohol-Policy-18-February-2019-signed-copy.pdf. Note that Tauranga City Council Local Alcohol Policy 2023 (discontinued) included a change to the one-way door policy for on-licences and club licences to start at 1am in the city centre instead of the previous 2am. See Tauranga City Council Strategy, Finance and Risk Committee meeting minutes. 30 October 2023 (page 17, item 9.14). Available from: https://infocouncil.tauranga.govt.nz/Open/2023/10/SFR_20231030_MIN_2524.PDF. However, the recommenced Tauranga City Council Local Alcohol Policy 2024 removed the one-way door policy (section 77(1)(f)), with the only reference to a one-way door condition under discretionary conditions for special licences.

350 Supra at 275 = Dunedin City Council. Local Alcohol Policy 2019. Available from: https://www.dunedin.govt.nz/__data/assets/pdf_file/0007/682891/Dunedins-Local-Alcohol-Policy.pdf

351 Mackenzie District Council, Timaru District Council, Waimate District Council. Joint Local Alcohol Policy 2024. Available from: www.timaru.govt.nz/__data/assets/pdf_file/0004/869143/Local-Alcohol-Policy-adopted-13-February-2024.pdf.

352 Policy 3.3: a one-way door restriction may be imposed on a new or renewed licence for any hotel or tavern from midnight. Supra at 287 = Kaikōura District Council. Local Alcohol Policy 2020. Available from: https://www.kaikoura.govt.nz/repository/libraries/id:2i17fvyhr17q9scmy0d8/hierarchy/Rules%2C%20Regulations%20and%20Licences/Alcohol%20Licensing/Final-Local-Alcohol-Policy-2020-signed.pdf.

353 Supra at 118 = Ōtorohanga District Council. Local Alcohol Policy 2016. Available from: https://www.otodc.govt.nz/media/dtjehhbg/lapp-final.pdf. See also Ōtorohanga District Council. Local Alcohol Policy 2024 (in force 28 October 2024). Available from: https://www.otodc.govt.nz/assets/Documents/Policies/Local-Alcohol-Policy-final-24-September-2024.pdf

354 Supra at 71 = Rotorua Lakes Council. Local Alcohol Policy 2019. Available from: https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/our-council/policiesandbylaws/bylaws/Adopted-Local-Alcohol-Policy-18-February-2019-signed-copy.pdf.

355 Supra at 85 = Waikato District Council. Local Alcohol Policy 2017. Available from: https://www.waikatodistrict.govt.nz/docs/default-source/your-council/plans-policies-and-bylaws/policies/local-alcohol-policy-2017.pdf?sfvrsn=8522bbc9_4.

356 Supra at 87 = Waipā District Council. Local Alcohol Policy 2016. Available from: https://www.waipadc.govt.nz/repository/libraries/id:26zgz4o7s1cxbyk7hfo7/hierarchy/our-uruocal%20Alcohol%20Policy%20FINAL%20adopted.pdf. The 2016 LAP has been reviewed in 2024. See Waipā District Council. Waipā's alcohol policy and bylaw review. Available at https://haveyoursay.waipadc.govt.nz/waipas-local-alcohol-policy.

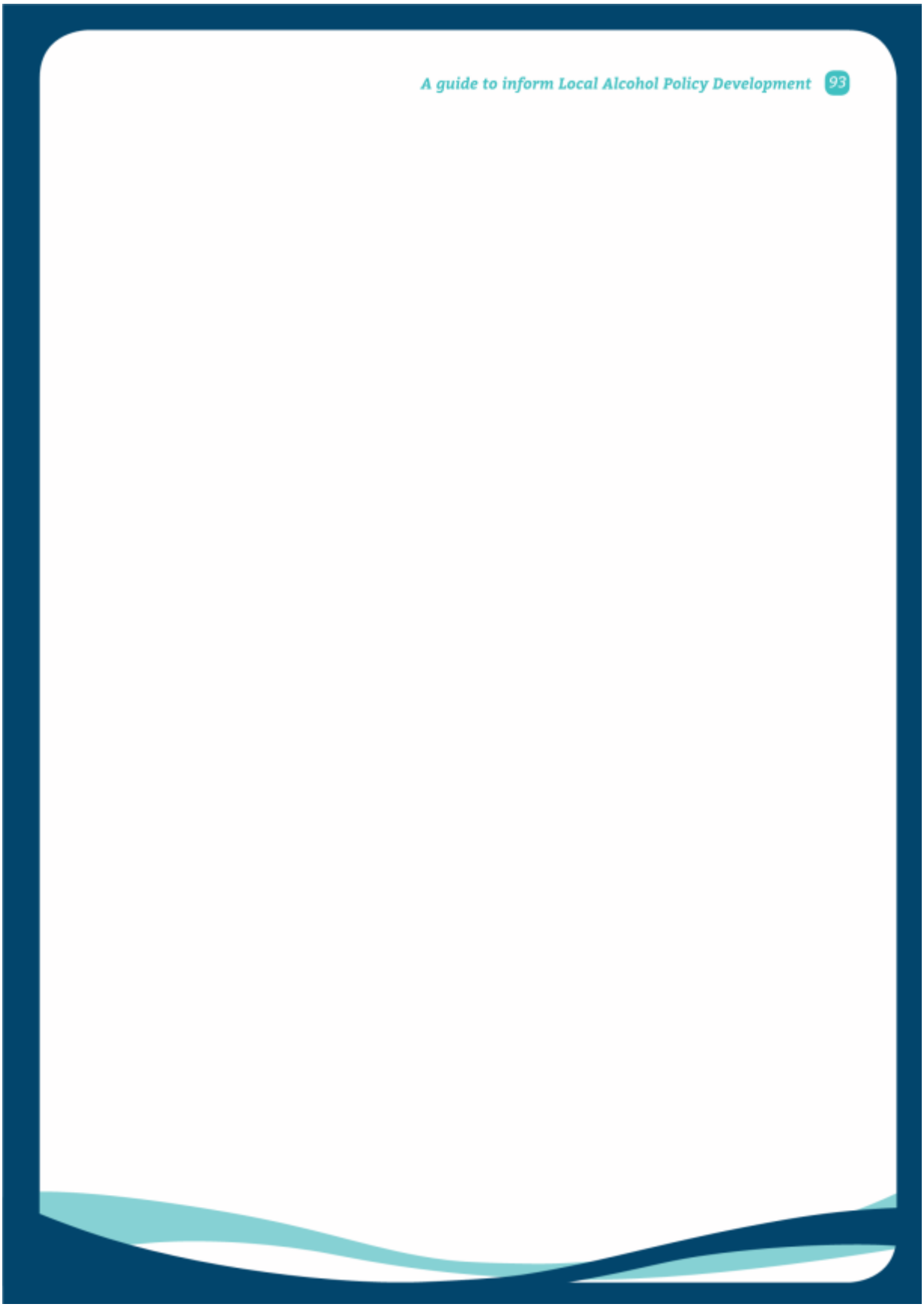
357 Supra at 88 = Waitomo District Council. Local Alcohol Policy 2022. Available from: https://www.waitomo.govt.nz/media/stfecmkv/provisional-local-alcohol-policy-2022.pdf.

358 Supra at 275 = Dunedin City Council. Local Alcohol Policy 2019. Available from: https://www.dunedin.govt.nz/__data/assets/pdf_file/0007/682891/Dunedins-Local-Alcohol-Policy.pdf

359 Supra at 2 = New Zealand Law Commission. *Alcohol in Our Lives: Curbing the Harm* [Internet], New Zealand Law Commission, 2010. NZLC Report No. 114. Available from: https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf.

360 Supra at 198 = Livingston M, Chikritzhs T, Room R. Changing the density of alcohol outlets to reduce alcohol-related problems [Internet]. *Drug and alcohol review*. 2007 Sep; 26(5):557-66. Available from: https://doi.org/10.1080/09595230701499191

361 Supra at 1 = Sale and Supply of Alcohol (Community Participation) Amendment Act 2023 (Public Act 2023 No. 60). Available from: https://www.legislation.govt.nz/act/public/2023/0060/latest/LMS791367.html



Alcohol Healthwatch
Whakatūpato Waipiro
AL1247 | OCT 2024

Great South Letter of Expectation 2026/2027

Record no: R/25/8/37977
Author: Michal Gray, Democracy advisor
Approved by: Vibhuti Chopra, Group Manager Strategy and Partnerships/Acting Chief Executive

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 The purpose of this report is to present the draft Great South Letter of Expectation 2026/2027 to Council for approval.

Executive summary

2 Great South is a council-controlled organisation that provides regional development services for Council.

3 Providing Great South with a Letter of Expectation (LOE) is an early opportunity for Council as a shareholder to provide guidance to Great South in setting out its priorities and activities for the upcoming year through the Statement of Intent 2026/2027.

4 The draft LOE, contained in Attachment A, has been approved by the Joint Shareholders Committee (JSC) and formally recommended to each shareholder for approval.

5 The draft LOE supports the continuation of priorities and activities as outlined in the Statement of Intent 2025/2026.

6 The draft LOE includes funding for Great South that was budgeted in Council's long term plan for regional development for 2026/2027. This funding is subject to change by Council through the annual plan process.

7 Council is being presented the draft LOE for approval. Council is also able at this time to add any further specific direction for Great South to the LOE.

8 Assuming all shareholders individually approve the draft LOE, the JSC will approve the final LOE at its meeting on 19 September 2025 and deliver it to Great South by the end of the triennium.

9 Great South must provide a draft SOI 2026/2027 to its shareholders by 1 December 2025.

10 In the new triennium, Council will have another opportunity to review the priorities and activities of Great South when they provide feedback on the draft SOI 2026/2027. This feedback must be considered by Great South by 1 May 2026 and Great South must deliver the final SOI 2026/2027 to the shareholders by 15 June 2026.

Recommendation

That the Council:

a) receives the report titled "Great South Letter of Expectation 2026/2027".

b) determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002.

c) determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) approves the draft Letter of Expectation 2026/2027 as contained in Attachment A of this report to guide Great South in its preparation of the draft Statement of Intent 2026/2027.

e) Notes that in the new triennium Council will have a further opportunity to review and provide feedback on Great South's draft Statement of Intent 2026/2027.

f) Notes that the draft Letter of Expectation 2026/2027 includes funding for regional development that was budgeted in Council's Long Term Plan 2024-2034.

Background

11 Southland Regional Development Agency Ltd, trading as Great South, is a council-controlled organisation (CCO) under the Local Government Act 2002 (the Act).

12 Schedule 8 of the Act, requires CCOs to submit a SOI to its shareholders annually. The SOI outlines the strategic direction and priorities of the CCO for following year. A LOE may be provided to the CCO by the shareholders to provide guidance and direction as the CCO prepares its SOI.

13 Great South has four council shareholders (Southland District Council, Invercargill City Council, Gore District Council and Environment Southland) and five shareholders that are community organisations. Representatives of the shareholders form the Joint Shareholders Committee (JSC), which is responsible under the shareholder agreement for delivering a combined LOE to Great South by 31 October in each year.

14 The 2024/2025 LOE provided direction and funding forecasts for a three year period to enable Great South to prepare a three year 2024-2027 SOI that aligned with the Councils 2024-2034 long term plans. This was intended to provide certainty of direction to the operations of Great South.

15 The LOE and SOI process in each subsequent year of the three year period allows for review and refinement of Great South's priorities and direction. It has been practice to seek more minor changes in these annual years, noting that any significant changes are more appropriate in the long term plan years to align the SOI with the Council's long term plans.

16 The 2026/2027 year is the third and final year of the SOI 2024-2027.

Letter of expectation process

17 In previous years, each shareholder has approved priority areas that staff have then incorporated into a combined LOE, that is then approved by the JSC and delivered to Great South.

18 The process for the development of the SOI 2026/2027 was reviewed and modified by the JSC. Those changes include the following steps that relate to the LOE:

- The JSC requested that staff prepare a combined draft LOE for it to consider and recommend that the shareholders then separately approve.
- At its meeting on 8 August 2025 the JSC considered the draft LOE (contained in Attachment A) and formally recommended the shareholders approve the draft LOE.
- There is an opportunity when the shareholders consider the recommended draft LOE to add any further specific direction to Great South.
- Once the shareholders have all approved the draft LOE, the JSC will approve and deliver the final LOE to Great South prior to the end of the triennium.

Issues

Draft letter of expectation 2026/2027

19 Providing Great South with the LOE 2026/2027 is an early opportunity for Council as a shareholder to provide guidance to Great South in setting out its priorities and activities for the upcoming year through the Statement of Intent 2026/2027.

20 The draft LOE was formally recommended by the JSC for approval by each shareholder. The key points of the draft LOE are as follows:

- The draft LOE does not request any changes to the existing regional priorities of Great South (as contained in SOI 2025/2026), but it does note that there has been discussion around supporting investment for infrastructure needs in Southland.
- The draft LOE states that the individual shareholder priorities remain unchanged from the SOI 2025/2026, with the exception of Invercargill City Council that requested progress on three individual priorities.
- The draft LOE includes funding for Great South that has been budgeted by each council shareholder in their respective long term plans. This funding is subject to change by Council through the annual plan process.

Statement of Intent 2026/2027

21 Great South must provide a draft SOI 2026/2027 to its shareholders by 1 December 2025.

22 In the new triennium, Council (and the other shareholders) will have another opportunity to review the priorities and activities of Great South - when they provide feedback on the draft SOI 2026/2027. This feedback must be provided by 31 March 2026 and Great South must deliver the final SOI 2026/2027 to the shareholders by 30 June 2026.

Factors to consider

Legal and statutory requirements

23 Great South is a council-controlled organisation as defined in section 6 of the LGA and is subject to the statement of intent process requirements outlined under section 64 and Schedule 8 of the act. Great South's constitution and the shareholder agreement also set out requirements on the statement of intent process.

24 Council's obligations as a shareholder include contribution to the core costs as set out in the shareholder agreement.

Community views

25 Regional development funding was included in the LTP 2024-2034 which involved thorough consultation.

Costs and funding

26 The LTP 2024-2034 included budgets for regional development for the three years of the SOI 2024-2027. The budget for 2026/2027 is $1,296,827.

Policy implications

27 This matter aligns with the LTP 2024-2034.

Analysis of Options

Option 1 – Approve the draft LOE

Advantages	*Disadvantages*
• the draft LOE conveys the expectations of the shareholders to Great South to guide the preparation of the SOI. • Council can add in any specific direction to the draft LOE. • Great South will be able to continue to progress on current projects/initiatives. • work will be undertaken in some key regional development areas which will have positive impacts/benefits for people in the Southland District • the approach to maintain the same level of funding has no effect on rates or funding across different parts of Council. • there are other points in the process where Council can provide input into the SOI.	• no known disadvantages

Option 2 – Not approve the draft LOE

Advantages	*Disadvantages*
• the new Council could be presented the draft LOE for approval.	• It is unlikely that the new Council will be able to meet and consider the draft LOE in time to meet the 31 October requirement for delivery to Great South. • Council may miss an early opportunity to provide input on the direction of Great South. • delays in the process resulting increased pressure on Great South to deliver within timeframes.

Assessment of significance

28 Staff have assessed this decision as being of moderate importance but not as significant in relation to Council's Significance and Engagement Policy.

29 The matter promotes Council's community outcomes in the Southland District in the space of regional development and has a modest impact for the levels of service for Council activities set out in the LTP 2024-2034.

30 The matter aligns with existing Council strategies, plans, policies and previous Council decisions and specifically the LTP 2024-2034.

Recommended option

31 Staff recommend option 1, that Council approves the draft LOE that has been recommended by the JSC.

Next steps

32 Assuming all shareholders individually approve the draft LOE, the JSC will approve the final LOE at its meeting on 19 September 2025 and deliver it to Great South by the end of the triennium.

33 Great South must provide a draft SOI 2026/2027 to its shareholders by 1 December 2025.

34 Council will be able to provide feedback on the draft SOI 2026/2027 by 31 March 2026. Great South must deliver the final SOI 2026/2027 to the shareholders by 30 June 2026.

Attachments

A Draft Great South Letter of Expectation 2026 2027 ⇩
B Great South Statement of Intent 2025-2028 ⇩

8 August 2025

Ian Collier
Great South
PO Box 1306
Invercargill 9840

Dear Ian

Great South Letter of Expectation 2026-2027

Introduction

I'm writing to you on behalf of the Great South Joint Shareholders as Chair of the Joint Shareholders Committee.

Thank you for another productive year supporting our region. I would like to formally acknowledge the great work that your team has done, which was recently summed up perfectly by the Associate Regional Development Minister, Mark Patterson:

> *"During my time in politics I have always enjoyed my engagement with the Southland community. The local politics is fought tough, but when it matters everyone comes together for the greater good of Southland. You do the work internally and come together with a compelling plan for central government. In my experience, no province in New Zealand is as cohesive as Southland.*
>
> *I have always been impressed by the work done by Great South as the regional economic development agency. It is the gold standard by which I measure other provinces.*
>
> *The agency's track record of bringing together business, iwi and local government, as well as identifying regional opportunities around a cohesive strategy, is second to none. It hasn't hit a home run every time but that is expected. There is always risk and reward balance required."*

As we navigate through the continuum of change, it is comforting to know that as a Region we have a plan, and that we are all working together in the collective interest of Southland.

DRAFT

Legislative background

This letter of expectation (LOE) is written in accordance of s64B of the Local Government Act (LGA). While not mandatory, the delivery of LOEs to council-controlled organisations (CCO) is regarded as best practice. It provides guidance and direction to CCOs from their shareholders prior to preparation of their annual the statement of intent (SOI).

As you are aware, under s64(2) the purpose of a statement of intent is to:

- Publicly state the activities and intentions of the CCO for the year, and the objectives to which those activities will contribute;
- An opportunity for shareholders to influence the direction of the entity; and
- Provide a basis for the entity's governing body to be accountable to the shareholders for the entity's performance.

Regional priorities

In August 2023, Great South hosted a strategic planning workshop with its shareholders and board to gain collective agreement on long-term priorities for the region and Great South's activities. It was subsequently agreed and noted that the focus would be on the following regional strategic areas:

- Regional development leadership
- Business support & diversification
- Regional Promotion
- Net Zero Southland

In addition, for Great South to support a number of key enablers identified in the Beyond 2025 Southland Plan as being key to Southland's growth and sustainability, specifically:

- Data
- Housing
- Aquaculture
- Energy
- Forestry

Since these regional priorities were agreed in 2023, I note the new addition of *agriculture* to this list, as outlined in the Great South Statement of Intent 2025/2026. There has also been discussion around supporting investment for infrastructure needs in Southland.

Individual Shareholder Priorities

Priorities specific to each shareholder remain unchanged and have been previously outlined within the Great South Statement of Intent 2025/2026, with the exception of Invercargill City Council who, as a part of their contract funding requests that Great South progress (in order of priority):

1. Product packaging and capability development for tourism operators in Bluff;
2. The development and sharing of the Motupōhue Bluff story as part of the Murihiku Southland story;
3. Projects 8, 20, and 7 of the Te Taurapa o Te Waka – Bluff Hill Experience.

Funding

	Total
Invercargill City Council	$2,038,412
Southland District Council	$1,296,827
Gore District Council	$256,250
Environment Southland	$213,850
Total	**$3,805,339**

***Please note that the table above is LTP budgeted funding and may be subject to variation through the local government annual plan process.*

Next steps

On receipt of this LOE, the JSC requests that the Board provides a draft SOI by 1 December 2025. The JSC will then obtain input from shareholders, and provide joint feedback to you by 31 March 2026. This feedback will inform the final SOI which is expected to be received by June 2026.

Yours sincerely

Mayor Rob Scott
Chair - Great South Joint Shareholders Committee

cc: Chami Abeysinghe, Great South

GREAT SOUTH
Southland Regional Development Agency

Statement of Intent

2025 - 2028

COMPANY DIRECTORY

SOUTHLAND REGIONAL DEVELOPMENT AGENCY LIMITED
TRADING AS GREAT SOUTH
PO Box 1306
Invercargill 9810
(03) 211 1400
www.greatsouth.nz

DIRECTORS
Ian Collier (Chair)
Jason Franklin
Jeff Grant
Lucy Griffiths
Peter Heenan
Rachel Lindsay
Maria Pera

REGISTERED OFFICE
Southland Regional Development Agency Limited
143 Spey Street, Invercargill

BANK
Westpac New Zealand

AUDITORS
KPMG (on behalf of the Office of the Auditor General)

SHAREHOLDERS

Class A Shareholders
Invercargill City Council
Southland District Council
Gore District Council
Environment Southland

Class B Shareholders
Invercargill Licensing Trust
Mataura Licensing Trust
Southland Chamber of Commerce
Southern Institute of Technology

MEMBERS
Community Trust South

LEGAL STATUS
Southland Regional Development Agency Limited ("SRDA") was incorporated in New Zealand on 29 March 2019 under the Companies Act 1993 (NZBN 9429047359185).

COMPANIES OWNED BY THE SOUTHLAND REGIONAL DEVELOPMENT AGENCY LTD.
Space Operations New Zealand Limited – 100%
New Zealand Functional Foods Limited – 49%

PURPOSE OF THIS STATEMENT OF INTENT
In accordance with the requirements of Section 64(1) of the Local Government Act 2002, this Statement of Intent publicly states the planned activities, intentions and performance measures for Great South, Southland Regional Development Agency, for the next three years. It is written in response to the shareholders' letter of expectation, received 13 December 2024.

Great South is tasked with leading the future growth aspirations of Southland on behalf of its shareholders, stakeholders and the wider Southland community.

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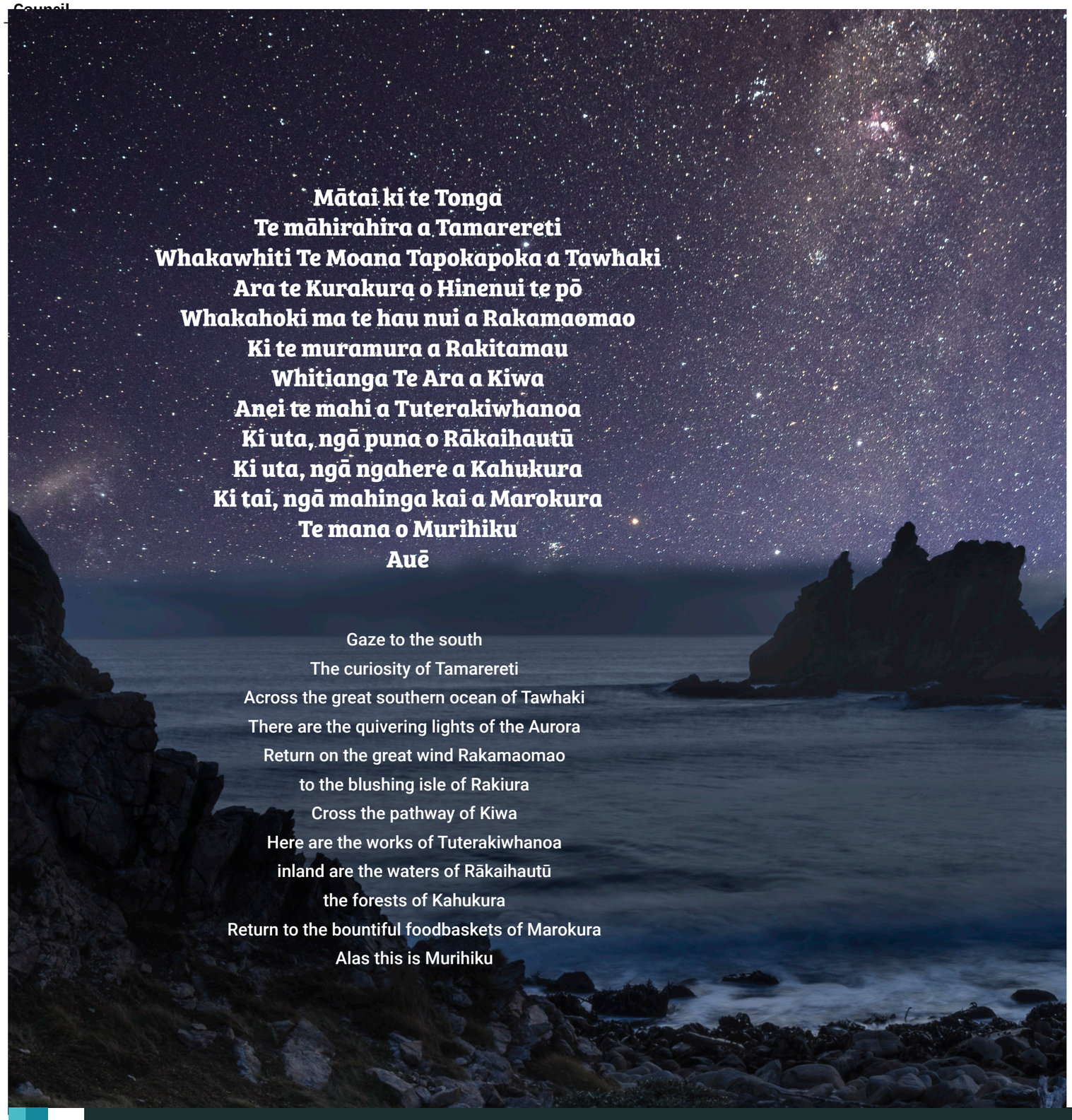


Foreword

It is my pleasure to present Great South's Statement of Intent for 2025-2028, a roadmap for Murihiku Southland's growth and resilience.

With clear priorities identified for the region, Great South continues to advocate strongly on behalf of Murihiku Southland to both local and central government. Certainty of funding from our councils has enabled us to focus on transformational projects, including aquaculture, tourism, and data-driven innovation, while ensuring we remain agile in a challenging economic environment.

The Government's recent focus on aquaculture has created exciting opportunities for our region. The establishment of five new Aquaculture Settlement Areas, spanning almost 9000 hectares, positions Southland at the forefront of this $3 billion national growth sector. Further support, such as the $2.2 million loan through the Regional Infrastructure Fund (RIF) to Ocean Beach, enhances Southland's role as a leader in sustainable seafood production.

Sustainability remains central to our mission. Recent changes to the Emissions Trading Scheme provide clarity for landowners, balancing forestry and agriculture to ensure both economic productivity and climate goals are met. Great South is also proud to have received recognition for leadership in sustainability, reflecting our commitment to creating a thriving, low-emissions future.

Our innovative initiatives, including Space Operations New Zealand Ltd (Space Ops NZ) and the Data and Insights Southland Hub (DISH), continue to position the region as a leader in technology and connectivity. These projects are creating high-value jobs, attracting investment, and showcasing Southland as a hub for cutting-edge innovation.

Guided by the Beyond 2025 Southland long-term strategy, we are advancing key opportunities that will shape Murihiku Southland's future. Initiatives such as the Te Taurapa o Te Waka – Motupōhue Visitor Experience highlight the transformative potential of tourism, while ongoing work in aquaculture and renewable energy strengthens our economic and environmental foundations.

Great South remains committed to driving sustainable growth and innovation while championing the interests of our community. Together, we are creating a resilient, forward-thinking region that offers opportunities for generations to come.

Ian Collier
Great South Board Chair

Our vision

Even better lives through **sustainable regional development**

As Murihiku Southland's regional development agency, Great South is responsible for economic development and promotion of the region. Our vision of 'even better lives through sustainable regional development' frames all the work we do, ensuring Murihiku Southland is the best place to live, work and visit. We want our region to be the best place to start and sustain a business, the best place to travel in, to host an event or conference, to study, migrate to, or invest in. By creating a region that is the best place in New Zealand to live, visit and work, we create a platform for the region to prosper – economically and in terms of vibrancy and liveability.

New Zealand has seen a shift in government, which means there will be changes to government policies. This will likely provide opportunities for regional development which Great South will pursue on behalf of the region. However, major industry changes driven by climate effects will continue to force a shift in activity and taking a sustainable approach in its widest sense (environmental, economic and social), will continue to be critically important.

Southland snapshot

NET EMISSIONS FOR 2022

4,947,505 tCO_2e

14.8% decrease from 2018 baseline

CURRENT POPULATION

100,143

GEOGRAPHIC AREA

31,218 km^2

REGIONAL GDP

$8.271b

AVERAGE HOUSEHOLD INCOME

$97,382

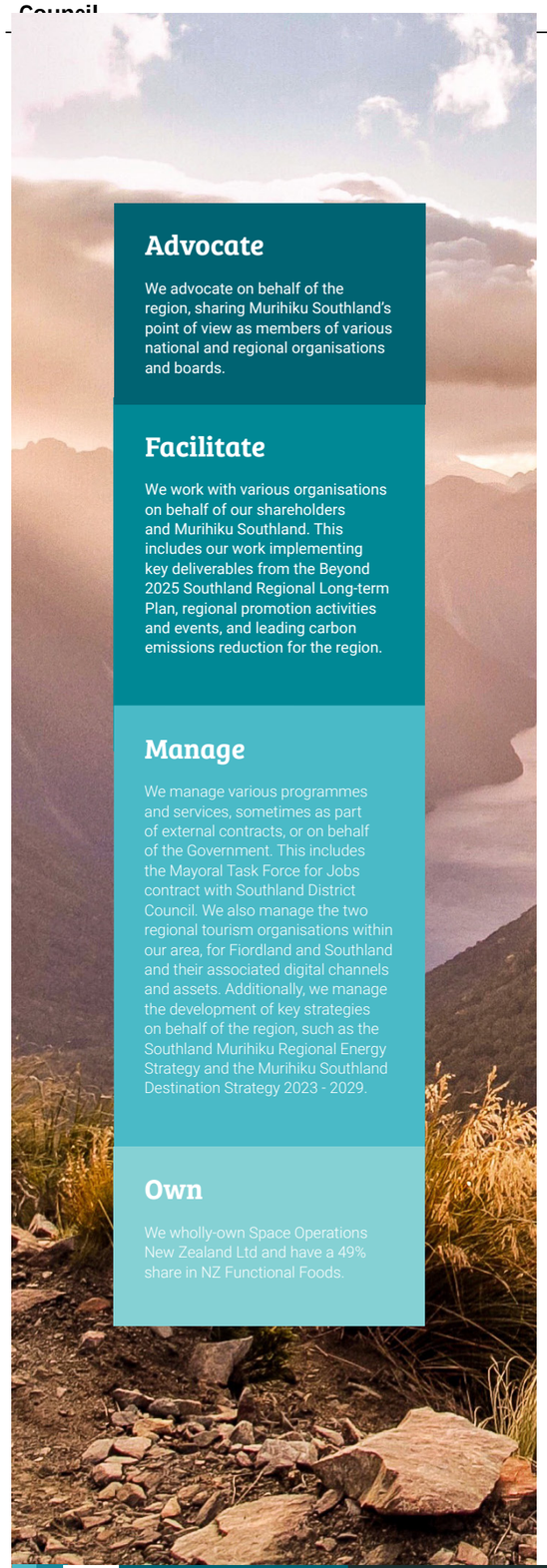
UNEMPLOYMENT RATE

5.3%

MAIN INDUSTRIES BASED ON NUMBER OF EMPLOYEES

- Agriculture
- Retail
- Health Care
- Manufacturing
- Construction

Figures sourced from MBIE, Infometrics & Statistics New Zealand



Advocate

We advocate on behalf of the region, sharing Murihiku Southland's point of view as members of various national and regional organisations and boards.

Facilitate

We work with various organisations on behalf of our shareholders and Murihiku Southland. This includes our work implementing key deliverables from the Beyond 2025 Southland Regional Long-term Plan, regional promotion activities and events, and leading carbon emissions reduction for the region.

Manage

We manage various programmes and services, sometimes as part of external contracts, or on behalf of the Government. This includes the Mayoral Task Force for Jobs contract with Southland District Council. We also manage the two regional tourism organisations within our area, for Fiordland and Southland and their associated digital channels and assets. Additionally, we manage the development of key strategies on behalf of the region, such as the Southland Murihiku Regional Energy Strategy and the Murihiku Southland Destination Strategy 2023 - 2029.

Own

We wholly-own Space Operations New Zealand Ltd and have a 49% share in NZ Functional Foods.

How we operate

Great South works for the benefit of the whole region, placing equal importance on Southland's people, place, environment and economy.

With the future of New Zealand's Aluminium Smelter at Tiwai Point now confirmed for the next 20 years, we understand this will be a time of unprecedented change for Southland and strong leadership is required.

ROLES OF GREAT SOUTH

Our role varies depending on the nature of the project or initiative we are involved with. We are always building on relationships with sector representatives and key Southland stakeholders, and now that we are more established as an organisation, increasingly our role is to lead.

Our roles may be:

Advocate › Facilitate › Manage › Own

PARTNERING FOR SUCCESS

The future success of our region depends on partnerships. Great South works closely with stakeholders and the wider community and is committed to telling the shared stories of Murihiku Southland's people and place. Great South is committed to meeting its obligations under Te Tiriti o Waitangi and collaborates with the four Murihiku-based Rūnaka on numerous projects.

SUSTAINABLE FOCUS

Great South is a certified carbon conscious organisation and is taking positive action towards becoming carbon neutral and integrating sustainable considerations into all activities, including purchasing decisions and operational practises. We will set an example for the region including for businesses, stakeholders and communities we work with.

TE REO MĀORI

We will seek opportunities to support and raise the presence of Te Reo Māori through our activities and our day-to-day operations. This includes:

- A commitment to facilitating the upskilling of our team in both Te Reo and Tikanga Māori
- Introducing Te Reo into communications and marketing material where appropriate
- Incorporating Te Ao Māori into our business growth work as appropriate

PEOPLE AND CULTURE

The most valuable asset at Great South is our people. We are committed to creating a positive work environment and ensuring staff skills are relevant and up to date, allowing our people to thrive. A key focus will be to embed our internal organisation values:

- respect each other's contribution
- work together to achieve great things for our region
- care for each other and our place
- enjoy work and have fun

HEALTH AND SAFETY

Great South will take every practicable step to ensure the health and safety of our employees, contractors, visitors and attendees at events we manage.

OPERATIONAL EFFICIENCIES

In line with best management practice, we seek continuous improvement, improving processes and IT systems, to allow staff to operate in the most effective manner.

We continue to assess each purchasing decision and contract negotiation to ensure it can withstand a level of scrutiny as expected in the public sector.

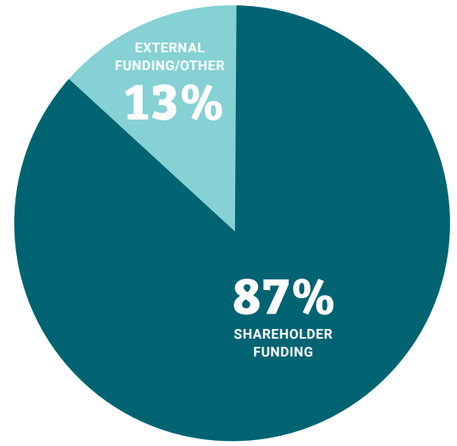
HOW WE ARE FUNDED

Great South receives its primary funding from its shareholding councils. It has also successfully secured funding from commercial and government partners. Examples of this include:

- MBIE and Callaghan Innovation for the Regional Business Partner Network (RBP).
- Commercial engagements

Great South also recieves funding from Community Trust South to undertake impetus and investigation activities.

Our revenue sources for 2025-2026



Our priorities

Regional development **leadership**

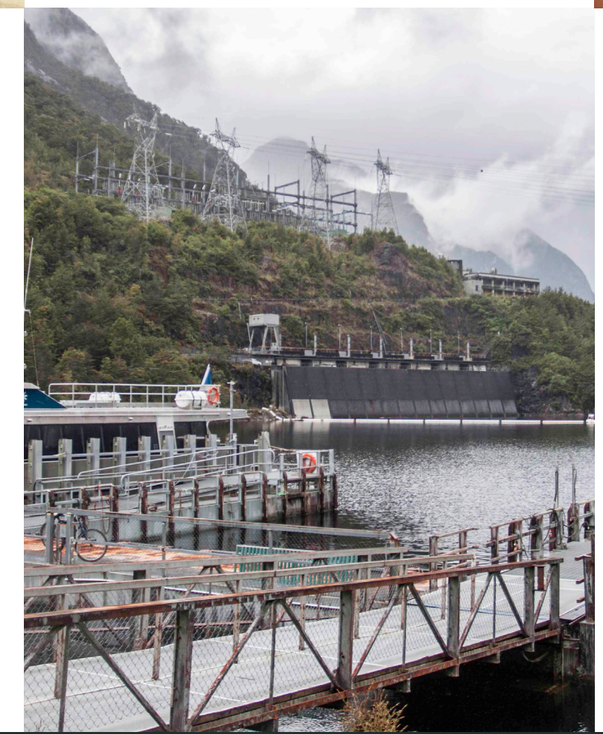
Great South provides leadership for the region by facilitating the implementation of the Beyond 2025 Southland Long Term Plan and through advocacy, writing submissions and representing Murihiku Southland nationally.

Business support and diversification

Great South supports the growth of the business sector in Murihiku Southland and investigates and aids opportunities to diversify the economy. We also support the attraction and retention of a skilled workforce to our region which will support new and existing industries.

Regional **promotion**

Great South promotes Murihiku Southland as a great place to live, work and visit. We prioritise destination management and work to develop our regional tourism sector in a way that brings benefit to our people and place. We also manage and support events that attract visitors to our region.



Net Zero Southland

Great South works with businesses across Murihiku Southland to address carbon emissions. Subject to external funding, we will facilitate and support businesses to make reductions, as the region heads towards being carbon neutral by 2050.

Regional development leadership

Advocate | Facilitate | Manage | Own

Regional strategic planning

Great South leads the implementation of the Beyond 2025 Southland Long-Term Plan, ensuring regional aspirations are backed by the infrastructure and policies needed to achieve them. By focusing on aquaculture, housing, and data, we unify regional efforts for a clear and consistent voice. Our work in developing strategies, feasibility studies, and plans ensures alignment with central and local government priorities, maximising positive outcomes for Murihiku Southland.

Advocate | Facilitate | Manage | Own

Advocacy

Great South ensures Murihiku Southland's needs and priorities are heard at the highest levels. By advocating with central government and by submitting on national consultation processes we will ensure that Murihiku Southland will achieve impactful outcomes in agriculture, housing, roading, forestry policy, and infrastructure investment. Regular engagement with central agencies and well-targeted submissions deliver tangible benefits that directly support the region's growth and success.

Advocate | Facilitate | Manage | Own

Data and insights

Great South is a trusted provider of critical data and insights that underpin effective regional planning and investment decisions. Through the Data and Insights Southland Hub (DISH), we deliver centralised, up-to-date dashboards and analysis to inform decision making. By continuously refining this resource and collaborating with central government, we address economic challenges and enable smart, data-driven decisions for Murihiku Southland

Advocate | Facilitate | Manage | Own

Murihiku Southland representation

Great South is a tireless advocate for Murihiku Southland, ensuring the region's strengths and opportunities are recognised on regional, national and international stages. Our active participation in forums, organisations, boards, conferences, and trade shows positions Murihiku Southland as a leader, building connections that drive growth and investment.

Performance measures

Regional development leadership performance measures

DESCRIPTION	KPI 2025-26	KPI 2026-27	KPI 2027-28
Data and Insights Provide up-to- date and accurate data and insights to inform decision making via development of a schedule of regular reports through Data Insights Southland Hub (DISH).	• Schedule of data reports are produced across three focus areas including; Housing, Economic andTourism. • Evaluate options for the storage & use of Geospatial Data and the use of AI data analysis tools.	• Schedule of data reports are produced across three focus areas including; Housing, Economic and Tourism.	• Schedule of data reports are produced across three focus areas including; Housing, Economic and Tourism.
Advocacy and Submission Advocate for and/or prepare submissions and funding applications for issues of importance to the region	• Prepare a minimum of two submissions on issues of regional significance. • Advocate for increased mobile coverage and reliable terrestrial fiber optic cable services for all of the region. • Support councils and stakeholders to apply for Government funds as applicable.	• Prepare a minimum of two submissions on issues of regional significance. • Advocate for increased mobile coverage and reliable terrestrial fiber optic cable services for all of the region • Support councils and stakeholders to apply for Government funds as applicable.	• Prepare a minimum of two submissions on issues of regional significance. • Support councils and stakeholders to apply for Government funds as applicable. • Support the development of reliable high capacity global connectivity.
Housing Facilitate regional coordination of housing and implement priorities from the Murihiku Southland Housing Action Plan	• Facilitate regional coordination of housing including delivery of two projects. • Support individual Councils with their housing planning (including Spatial Planning) considering current and future community and industry needs.	• Review Murihiku Southland Housing Action Plan. • Facilitate regional coordination of housing including delivery of two projects. • Support individual Councils with their housing planning considering current and future community and industry needs.	• Facilitate regional coordination of housing including delivery of two projects. • Support individual Councils with their housing planning considering current and future community and industry needs.
Aquaculture Facilitate and develop a regional approach to realise the benefits of Aquaculture as a diversification opportunity and implementation of The Regional Aquaculture Strategy/Plan.	• Implement agreed actions (max 2) from the Regional Aquaculture Strategy. • Coordinate actions needed from councils and others to achieve aspirations as per the Regional Aquaculture Strategy.	• Implement agreed actions (max 2) from the Regional Aquaculture Strategy. • Coordinate actions needed from councils and others to achieve aspirations as per the Regional Aquaculture Strategy	• Implement agreed actions (max 2) from the Regional Aquaculture Strategy. • Coordinate actions needed from councils and others to achieve aspirations as per the Regional Aquaculture Strategy.

Regional promotion

Advocate | Facilitate | Manage | Own

Destination marketing

Great South is the driving force behind showcasing Southland and Fiordland as must-visit destinations. Through platforms such as southlandnz.com and fiordland.org.nz, along with targeted campaigns in domestic and international markets, we ensure the region's unique appeal is recognised. Collaborating with key partners such as Tourism NZ, Air New Zealand, and Invercargill Airport, we advocate for regional connectivity and investment. Southlandnz.com serves as a vital hub for local businesses and event organisers while providing practical travel information to visitors.

Advocate | Facilitate | Manage | Own

Tourism product and destination development

Great South is at the forefront of transforming Murihiku Southland into a premier tourism destination. Through the Murihiku Southland Destination Strategy 2023–2029, we are spearheading initiatives that highlight the region's unique strengths, such as establishing Southland as a food tourism hub, gaining International Dark Sky Sanctuary status for Fiordland National Park, promoting sustainable tourism, and advancing tourism development in Motupōhue Bluff. These projects are critical to ensuring Murihiku Southland stands out on the global tourism map.

Advocate | Facilitate | Manage | Own

Business events

Great South is unlocking the potential of business events to drive year-round visitation and economic growth for Murihiku Southland. As Business Events Southland, we have developed a dedicated strategy and will proactively seek national and international events. By establishing the region as a premier business events destination, we are creating new opportunities that benefit local businesses, accommodation providers, and the wider community.

Advocate | Facilitate | Manage | Own

Invercargill City Centre activation

A thriving Invercargill city centre is vital to the prosperity of Murihiku Southland, and Great South is proud to play a leading role in its revitalisation. In partnership with Invercargill City Council, we deliver events and activities that energise the CBD, attract visitors, and foster community engagement. We also support event organisers with design and promotion, ensuring these events reach wide audiences and bring tangible benefits to the city.

Performance measures

Regional promotion performance measures

DESCRIPTION	KPI 2025-26	KPI 2026-27	KPI 2027-28
Consumer Marketing Promote Murihiku Southland as a year- round destination for travellers from New Zealand, Australia and other key markets resulting in more visitors	• Ensure 85% of website traffic comes from key markets in NZ, Australia, North America, Europe, Asia with 2 partnered digital campaigns	• Ensure 85% of website traffic comes from key markets in NZ, Australia, North America, Europe, Asia with 2 partnered digital campaigns	• Ensure 85% of website traffic comes from key markets in NZ, Australia, North America, Europe, Asia with 2 partnered digital campaigns
Media Increase positive travel media coverage for Murihiku Southland, promoting the region's diverse activities and experiences and drive regional spread, growth and seasonality	• 3 media famils • 15 media results and where possible measurement of reach and equivalent advertising value (EAV)	• 3 media famils • 15 media results and where possible measurement of reach and equivalent advertising value (EAV)	• 3 media famils • 15 media results and where possible measurement of reach and equivalent advertising value (EAV)
Showcasing our region Trade Events, Trade Famils and TRENZ.	• Attend 5 trade shows. • Attend 2 partnered famils • 2 Murihiku itineraries in line with Milford Opportunities Project pillars supporting regional and seasonal spread	• Attend 5 trade shows. • Attend 2 partnered famils • 2 Murihiku itineraries in line with Milford Opportunities Project pillars supporting regional and seasonal spread	• Expand on trade presence to enable growth of seasonal and regional offers.
New Experiences	• Introduce1 new iwi partnered experience. • Establish local cruise network	• Further iwi partnered experience developed	• Identify gaps in regional experiences and build capability to fill these gaps
Business Events Develop Murihiku Southland as a Business Events destination in line with Business Events strategy	• Attend min 3 conference events • Events sales calls	• Attend min 3 conference events • Events sales calls	• Continue to solidify Invercargill's and the Murihiku regional Business events offer targeting seasonal gaps in capacity.
Regional Events Calendar Maintain southlandnz.com website calendar listings for regional events	• 10% increase on number of events listed • 10% increase on number of overall page views • 15% increase on number of overall page views from within Southland	• 10% increase on number of events listed • 10% increase on number of overall page views • 15% increase on number of overall page views from within Southland	• Developing and building awareness around regional events
Unmissable Regional Events	• Support delivery of Burt Munro Challenge (BMC) • Identify areas to develop capability of the BMC	• Support delivery of building capability for Burt Munro Challenge	• Continued support building awareness of major events in line with event and regional strategy including building visitation
Regional Marketing of events	• Six cluster events • Four seasonal campaigns • Marketing of unmissable events	• Six cluster events • Four seasonal campaigns • Marketing of unmissable events	• Six cluster events • Four seasonal campaigns • Marketing of unmissable events
Destination Development Progress projects from the Murihiku Southland Destination Strategy (MSDS)	• Progress 3 projects from the Murihiku Southland Destination Strategy (MSDS)	• Progress 3 projects from MSDS which includes delivering the Murihiku Southland Sustainable Tourism programme – identified with deliverable outcomes.	• Continue to implement MSDS aligning with areas where funding is available around community outcomes.

Business support and diversification

Advocate | Facilitate | Manage | Own

Business diversification

Great South is a catalyst for business growth and resilience in Murihiku Southland. We empower local businesses to explore diversification opportunities and develop actionable plans to bring these to life. Through targeted feasibility studies, we attract new and complementary businesses to the region, strengthening existing industries and driving innovation to support Murihiku Southland's economic future.

Advocate | Facilitate | Manage | Own

Economic diversification

Great South drives innovation and growth by supporting key opportunities such as Space Operations New Zealand Limited, aquaculture, and data centres. Our efforts focus on attracting new investment to bolster both emerging and existing businesses, fostering a resilient and diversified economy for Murihiku Southland.Partnering with Councils, we are investigating the impacts of unrestricted forestry while conducting ongoing analysis of livestock numbers, forestry growth, and water allocation. Our efforts ensure the sector's sustainability and long-term success.

Advocate | Facilitate | Manage | Own

Support the agriculture sector

As the backbone of Murihiku Southland's economy, agriculture remains a key focus for Great South. We work closely with farmers to explore land-use change opportunities and support informed decision-making.

Advocate | Facilitate | Manage | Own

Southland Youth Futures and the Mayoral Taskforce for Jobs

Great South is committed to fostering youth employment and development in Murihiku Southland. Subject to funding, we plan to continue delivering the Southland Youth Futures Programme in 2025, connecting young people with the diverse job opportunities available in the region and helping employers build their future workforce.

Under the Mayors Taskforce for Jobs (MTFJ) contract with Southland District Council, we've supported young people under 25 into employment, education, and training. This initiative has created meaningful pathways for youth by working collaboratively with local employers and leveraging the nationwide MTFJ network. Our focus remains on empowering young people and building a skilled workforce that supports Murihiku Southland's future.

Performance measures

Business support and diversification performance measures

DESCRIPTION	KPI 2025-26	KPI 2026-27	KPI 2027-28
Business in Southland - A regional guide Resource document that outlines useful information for new & potential businesses to the region.	• Maintain the regional guide to support new businesses to Southland.	• Review and change the regional guide as needed.	• Review and change the regional guide as needed.
Agriculture Support agricultural sector land- use and support farmer decision making	• Undertake analysis of relevant agricultural sector data to feed into the Regional Emissions Report for 2026. • Investigate opportunities for new high value crops and establish links into new and emerging industries. • Develop a Murihiku Southland Agriculture Strategy alongside key stakeholders which also looks at new farm revenue opportunities.	• Undertake analysis of relevant agricultural sector data to feed into the Regional Emissions Report for 2027. • Identify suitable locations for crop growing and establish the critical scale required to optimize opportunities.	• Undertake analysis of relevant agricultural sector data to feed into the Regional Emissions Report for 2028.
Forestry Support further investigation of the impacts and possible opportunities associated with unrestricted forestry	• Provide data and insights relating to changing land use and the impacts of carbon forestry. • Identify new opportunities to convert forestry waste low grade logs into biomass fuel supply. • Advocate for the establishment of a Regional Forestry plan and for value added wood processes.	• Provide data and insights relating to changing land use and the impacts of carbon forestry. • Continue to grow opportunities to convert forestry waste low grade logs into biomass fuel supply. • Undertake and complete a Murihiku Regional Forestry Strategy focused on high value products for domestic and export markets.	• Provide data and insights relating to changing land use and the impacts of carbon forestry. • Continue to grow opportunities to convert forestry waste into biomass fuel supply.

Great South **Statement of Intent** - 2025 - 2028 OUR WORK 15

Net Zero Southland

Advocate **Facilitate** Manage Own

Encourage low impact industry

Great South is driving Murihiku Southland's transition to a low-emissions future. By providing robust data and insights, we enable informed decision-making that supports the region's net zero emissions goals by 2050. We actively encourage the development of new industries that address climate change and emissions reduction targets, fostering sustainable growth for the region.

Advocate **Facilitate** **Manage** Own

Sustainable tourism destination management

Sustainability is at the heart of the Murihiku Southland Destination Strategy, and Great South leads efforts to position the region as a model for sustainable tourism. We work with key partners to implement environmental stewardship projects, ensuring Murihiku Southland remains a thriving and responsible destination for years to come.

Advocate **Facilitate** **Manage** Own

Monitor emissions

Since 2018, Great South has led the way in monitoring Murihiku Southland's annual emissions, providing a crucial baseline for measuring progress toward a low-emissions future. We will continue to track and report on regional emissions, sharing insights with regional leaders and the public to drive informed action and accountability.

Advocate **Facilitate** Manage Own

Energy planning

Great South is driving the implementation of the Southland Murihiku Regional Energy Strategy 2022–2050, ensuring the region transitions to a sustainable energy future. As part of this work, we will prepare reports on biogenic capture and use, as well as woody biomass availability, providing valuable insights to support informed energy planning and development.

Performance measures

Net Zero Southland performance measures

DESCRIPTION	KPI 2025-26	KPI 2026-27	KPI 2027-28
Monitor Emissions Complete annual regional emissions reporting as soon as national monitoring data becomes available	• Produce the Regional Emissions Report for 2024 as soon as national monitoring data becomes available	• Produce the Regional Emissions Report for 2025 as soon as national monitoring data becomes available	• Produce the Regional Emissions Report for 2026 as soon as national monitoring data becomes available
Net Zero Planning Implement the Net Zero Southland Plan and Emissions Reduction	• Evaluate the Southland Regional Emissions Reduction against the 1990 emissions and report on the findings by September 2025. • Seek public feedback on the revised Net Zero Southand Plan (2025) and publish the final report by March 2026.	• Implement Net Zero Southland Strategy and support regional climate change strategic planning.	• Implement Net Zero Southland Strategy and support regional climate change strategic planning and progress monitoring.
Implementation of the Regional Energy Strategy	• Support the Regional Energy Project Implementation including New Renewable energy projects, energy efficiency, wind, solar, biomass and methane recovery and use cases.	• Implement 2 actions from the reports.	• Implement 3 actions from the reports.

Space Operations New Zealand

Established by Great South in 2021, Space Operations New Zealand Limited (SpaceOps NZ) is a wholly owned subsidiary of Great South and a Council Controlled Trading Organisation (CCTO). As such, SpaceOps NZ presents its own Statement of Intent and associated financials to its shareholding councils. Its purpose is to meet the growing demand of the international small satellite (smallsat) community, positioning Murihiku Southland at the forefront of global space technology.

SpaceOps NZ owns and operates the Awarua Satellite Ground Station, Aotearoa New Zealand's only commercial low Earth orbit satellite ground station. Hosting antennas for international customers, the station provides critical southern hemisphere ground segment support for space agencies and commercial satellite operators. The satellites supported by Awarua are utilised for a wide range of applications, including tracking shipping containers, measuring the atmosphere, imaging the Earth, calibrating satellite navigation systems, and delivering internet services.

Awarua plays a key role in supporting international launch companies, including Rocket Lab, founded by Invercargill's Sir Peter Beck. As the first station with spacecraft visibility on the western Pacific Ocean, Awarua continues to attract global interest, with two international space businesses now based in Invercargill.

Recent developments have further cemented Awarua's position as a leader in space operations. In collaboration with Lockheed Martin Australia, two new 11-metre antennas have been added as part of the Trans-Tasman SouthPAN (Southern Positioning Augmentation Network) project. This initiative will enable centimetre-level positioning accuracy across New Zealand and Australia, enhancing smartphone capabilities for both countries. The antennas are supported by a mission operations centre in Invercargill, reinforcing the region's growing status as a space technology hub.

In July 2023, SpaceOps NZ expanded its operations by taking over Auckland University of Technology's radio astronomy facilities at Spark's Warkworth Satellite Earth Station. This acquisition includes two large antennas, measuring 12 metres and 30 metres in diameter. The 12-metre antenna is instrumental in pinpointing New Zealand's location within a couple of millimetres by receiving radio waves from some of the universe's most distant objects. Meanwhile, the 30-metre antenna extends SpaceOps NZ's capabilities into radio astronomy and communications with deep space spacecraft.

While its core business has been providing telecommunications to spacecraft orbiting 400 to 600 kilometres above Earth, SpaceOps NZ is now poised to play a key role in interplanetary exploration. By supporting both commercial and scientific missions, the company is advancing New Zealand's role in the global space industry, driving technological innovation, and creating high-value opportunities for the region.

Statement of comprehensive revenue and expense

For the 12 months to June

	2025/26 Budget	2026/27 Budget	2027/28 Budget
Revenue			
Shareholder Investment			
Core	2,066,182	2,138,498	2,213,346
Contract	1,641,527	1,641,527	1,641,527
Total	**3,707,709**	**3,780,025**	**3,854,873**
Other Revenue			
Service Revenue	1,118,818	621,438	272,898
Project Revenue	200,000	200,000	200,000
Total Other Revenue	**1,318,818**	**821,438**	**472,898**
Total Revenue	**5,026,527**	**4,601,463**	**4,327,771**
Expenditure			
Project and Service Expenditure			
Regional Economic Development	1,223,228	1,029,989	1,050,864
Business Support Services	508,343	279,664	82,375
Regional Tourism Development	738,947	755,791	767,521
Regional Event Delivery	494,341	490,067	362,709
Total Project Expenditure	**2,964,859**	**2,555,512**	**2,263,468**
Core expenditure			
Directors Fees	176,000	176,750	177,519
Employee Expense	1,121,105	1,107,086	1,134,763
Depreciation and Amortisation	55,000	50,000	50,000
Other Expenses	705,690	723,332	741,415
Total Core Expenditure	**2,057,795**	**2,057,168**	**2,103,697**
Total Expenditure	**5,022,654**	**4,612,679**	**4,367,165**
Net Surplus / (Deficit)	**3,873**	**(11,216)**	**(39,394)**
Taxation			
Net Surplus / (Deficit) After Taxation	**3,873**	**(11,216)**	**(39,394)**

Statement of financial position

As at 30 June

	2025/26 Budget	2026/27 Budget	2027/28 Budget
Assets			
Current Assets			
Cash and cash equivalents	1,180,762	1,122,852	964,991
Receivables and accruals	911,238	899,687	881,075
Prepayments	14,283	10,107	5,931
Total Current Assets	**2,106,283**	**2,032,646**	**1,851,997**
Non-current Assets			
Investments	1,072,589	1,072,589	1,072,589
Deferred Tax	31,071	31,071	31,071
Property, plant and equipment	162,480	127,480	92,480
Total Non-current Assets	**1,266,140**	**1,231,140**	**1,196,140**
Total Assets	**3,372,423**	**3,263,786**	**3,048,137**
Liabilities			
Current Liabilities			
Payables and accruals	166,757	168,939	162,706
Income tax payable	-	-	-
Income Received in Advance	426,356	331,147	158,484
Employee entitlements	292,674	299,991	307,491
Other current liabilities	77,533	65,822	60,962
Total Current Liabilities	**963,320**	**865,899**	**689,643**
Total Liabilities	**963,320**	**865,899**	**689,643**
Net Assets	**2,409,104**	**2,397,888**	**2,358,494**
Equity			
Contributed capital	1,338,421	1,338,421	1,338,421
Retained earnings	1,070,683	1,059,467	1,020,073
Total equity	**2,409,104**	**2,397,888**	**2,358,494**

Statement of cash flows

For the 12 months to June

	2025/26 Budget	2026/27 Budget	2027/28 Budget
Cash Flows from Operating Activities			
Receipts of Shareholder investment	3,707,709	3,780,025	3,854,873
Receipts from other operating activities	2,081,241	1,523,209	1,140,676
Income tax paid	-	-	-
Payments to employees	(3,506,664)	(3,008,394)	(2,806,006)
Payment to suppliers	(2,655,896)	(2,335,500)	(2,330,154)
Total cash flow from Operating Activities	**(373,610)**	**(40,660)**	**(140,611)**
Cash flow from Investing Activities			
Purchase of fixed assets and intangibles	(17,250)	(17,250)	(17,250)
Total cash flow from Investing Activities	**(17,250)**	**(17,250)**	**(17,250)**
Net Cash flows	**(390,860)**	**(57,910)**	**(157,861)**
Cash Balances			
Cash, cash equivalents and overdrafts at beginning of period	1,571,622	1,180,762	1,122,852
Cash, cash equivalents and overdrafts at end of period	1,180,762	1,122,852	964,991
Net change in cash for period	**(390,860)**	**(57,910)**	**(157,861)**

Accounting policies

REPORTING ENTITY

Southland Regional Development Agency Limited is a New Zealand registered company under the Companies Act 1993, and is deemed to be a Council Controlled Organisation under section 6 of the Local Government Act 2002.

Southland Regional Development Agency (trading as Great South) was established as Southland's regional development agency in March 2019. The registered office for Southland Regional Development Agency is 143 Spey Street, Invercargill.

Committed to driving economic, social and cultural growth, Southland Regional Development Agency has a clear mandate to leverage opportunities for Southland in the areas of economic and business development, tourism and events. This involves incorporating Southland's Regional Tourism Organisations, central government's Regional Business Partner (RBP) Network, delivering a range of events, regional initiatives, and government-funded contracts that pave the way for regional development.

BASIS OF PREPARATION

The financial statements have been prepared on a going concern basis, and the accounting policies have been applied consistently throughout the year.

STATEMENT OF COMPLIANCE

The financial statements have been prepared in accordance with the requirements of the Local Government Act 2002, the Companies Act 1993, and the Financial Reporting Act 2013. This includes the requirement to comply with generally accepted accounting practice in New Zealand (NZ GAAP).

These financial statements comply with Public Benefit Entity International Public Sector Accounting Standards (PBE IPSAS) Reduced Disclosure Regime (RDR). Southland Regional Development Agency is eligible and has elected to report in accordance with Tier 2 PBE standards RDR on the basis the entity has no public accountability and has expenses > $2m and < $30m.

PRESENTATION CURRENCY AND ROUNDING

The financial statements are presented in New Zealand dollars and all values are rounded to the nearest dollar. The functional currency of Southland Regional Development Agency is New Zealand dollars.

MEASUREMENT BASE

The financial statements have been prepared on an historical cost or fair value basis as per the following policies.

SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The following particular accounting policies, which materially affect the measurement of the results and financial position, have been applied:

Revenue

Revenue is measured at the fair value of consideration received.

Where funding is not conditional and Southland Regional Development Agency has no obligation to deliver a specific event or service, the revenue will be recognised when receipted. Where the funding has conditions attached to it, the funding is recognised as revenue upon entitlement as conditions pertaining to eligible expenditure have been fulfilled. The funding is held as a liability until the specific conditions are met. In certain circumstances funding is not received until after the event, in which case the revenue will be accrued when it is highly probable the funding will be received.

Revenue from ticket sales is recognised upon receipt unless the terms and conditions for the ticket state that Southland Regional Development Agency is required to repay the customer if the event does not take place. Where the terms and conditions contain a refund clause, the revenue will be recognised upon completion of the event.

Revenue from the rendering of services is recognised by reference to the stage of completion at the balance sheet date, based on the actual service provided.

Products held for sale are recognised when a product is sold to the customer. Sales are usually in cash or by credit card. The recorded revenue is the gross amount of the sale, including credit card fees payable for the transaction. Such fees are included in other expenses.

Southland Regional Development Agency acts as an agent for third parties for some transactions. When incurring expenditure as an agent, this is accounted for via the Statement of Financial Position, and not as revenue and expenditure on the Statement of Comprehensive Revenue and Expense. Any revenue component within these transactions will be treated accordingly.

Interest revenue is recognised using the effective interest method.

Volunteer services received are not recognised as revenue or expenditure as Southland Regional Development Agency is unable to reliably measure the fair value of the services received.

Revenue in Advance

Revenue in advance is recognised where amounts received are in excess of the amounts recognised as revenue.

Expenditure

All expenditure is recognised as incurred unless the liability is known and can be reasonably estimated, in which case the expenditure is accrued.

Foreign Exchange Transactions

Foreign currency transactions are translated into NZ$ (the functional currency) using the spot exchange rates at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in the surplus or deficit.

Goods and Services Tax (GST)

All items in the financial statements are stated exclusive of GST, except for receivables and payables, which are stated on a GST-inclusive basis. Where GST is not recoverable as input tax, then it is recognised as part of the related asset or expense.

The net amount of GST recoverable from, or payable to, the Inland Revenue Department (IRD) is included as part of receivables or payables in the Statement of Financial Position. The net GST paid to or received from the IRD, including the GST relating to investing and financing activities, is classified as an operating cash flow in the Statement of Cash Flows.

Income Tax

Income tax expense in relation to the profit or loss for the period comprises current tax and deferred tax.

Current tax is the amount of income tax payable based on the taxable profit for the current year, plus any adjustments to income tax payable in respect of prior years. Current tax is calculated using rates that have been enacted or substantively enacted by balance date.

Deferred tax is not recognised if the temporary difference arises from the initial recognition of goodwill or from the initial recognition of an asset and liability in a transaction that is not a business combination, and at the time of the transaction, affects neither accounting profit nor taxable profit. Deferred tax is calculated at the tax rates that are expected to apply in the period when the liability is settled or the asset is realised, using tax rates that have been enacted or substantively enacted by balance date.

Current tax and deferred tax is charged or credited to the Statement of Comprehensive Revenue and Expense, except when it relates to items charged or credited directly to equity, in which case the tax is dealt with in equity.

Equity

Equity is the shareholders interest in Southland Regional Development Agency, as measured by total assets less total liabilities.

Cash and Cash Equivalents

Cash and cash equivalents includes cash in hand, deposits held at call with banks, other short-term highly liquid investments with original maturities of three months or less.

Trade and Other Receivables

Trade and other receivables are initially measured at fair value and subsequently measured at cost, amortised where necessary, using the effective interest method, less any provision for impairment.

A receivable is considered impaired when there is evidence that Southland Regional Development Agency will not be able to collect the amount due. The amount of the impairment is the difference between the carrying amount of the receivable and the present value of the amounts expected to be collected.

Property, Plant and Equipment

Property, plant, and equipment consists of the following asset classes: buildings, furniture and fittings, IT equipment, ILT Kidzone equipment, vehicles, and land. All asset classes are measured at cost, less accumulated depreciation and impairment losses. Individual assets are capitalised if they meet the definition of an asset and the cost exceeds $1,000.

Additions

The cost of an item of property, plant and equipment is recognised as an asset if, and only if, it is probable that future economic benefits or service potential associated with the item will flow to Southland Regional Development Agency and the cost of the item can be measured reliably.

In most instances, an item of property, plant and equipment is recognised at its cost. Where an asset is acquired at no cost, or for a nominal cost, it is recognised at fair value when control over the asset is obtained. Work in progress is recognised at cost less impairment and is not depreciated.

Disposals

Gains and losses on disposals are determined by comparing the proceeds with the carrying amount of the asset. Gains and losses on disposals are included in the Statement of Comprehensive Revenue and Expense.

Subsequent Costs

Costs incurred subsequent to initial acquisition are capitalised only when it is probable that future economic benefits or service potential associated with the item will flow to Southland Regional Development Agency and the cost of the item can be measured reliably.

The costs of day-to-day servicing of property, plant, and equipment are recognised in the surplus or deficit as they are incurred.

Depreciation

Depreciation is provided on a straight-line basis on all property, plant and equipment at rates that will write off the cost of the assets to their estimated residual values over their useful lives. The useful lives and associated depreciation rates of major classes of assets have been estimated as follows:

Buildings:	3% - 7%	14.3 - 33.3 years
Furniture & Fittings:	6% - 33%	3 - 16.7 years
IT Equipment:	17.5% - 67%	1.5 - 5.7 years
ILT Kidzone:	13.5% - 33%	3 - 7.5 years
Vehicles:	13.5%	7.5 years
Land:	0%	

The residual value and useful life of an asset is reviewed, and adjusted if applicable, at each financial year end. An annual review for impairment is also undertaken on all assets and any impairment loss is recognised in the Statement of Comprehensive Revenue and Expense.

Impairment of Property, Plant and Equipment

Property, plant and equipment held that have a finite useful life are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable.

An impairment loss is recognised for the amount by which the asset's carrying amount exceeds its recoverable service amount. The recoverable service amount is the higher of an asset's fair value less costs to sell and value in use. If an asset's carrying amount exceeds its recoverable service amount, the asset is regarded as impaired and the carrying amount is written down to the recoverable service amount. The total impairment loss is recognised in the surplus or deficit.

The reversal of an impairment loss is recognised in the surplus or deficit.

Value in Use For Non-Cash Generating Assets

Value in use is the present value of the asset's remaining service potential. Value in use is determined using an approach based on either a depreciated replacement cost approach, restoration cost approach, or a service units approach. The most appropriate approach used to measure value in use depends on the nature of the impairment and availability of information.

Value in Use For Cash Generating Assets

Southland Regional Development Agency does not hold any cash generating assets.

Intangible Assets

Goodwill

Goodwill on acquisition of businesses and subsidiaries is included in "intangible assets". Goodwill on acquisition of an associate is included in "investment in other entities" and impairment is considered as part of the overall investment balance.

Goodwill is allocated to cash-generating units for the purposes of impairment testing. The allocation is made to those cash-generating units or groups of cash-generating units that are expected to benefit from the business combination in which the goodwill arose.

Goodwill has been assessed to have an infinite useful life on the basis the business is ongoing. Goodwill is subject to annual impairment testing.

Impairment of Intangible Assets

Intangible assets that have an indefinite useful life, or are not yet available for use, are not subject to amortisation and are tested annually for impairment.

Joint Venture

The Company's 49% share of its associate NZ Functional Foods Limited is equity accounted for in the Companies financial statements.

A joint venture is an entity over which the Company has significant influence and that is neither a subsidiary nor an associate. The Company's investment is accounted for in the financial statements using the equity method. The investment in a joint venture is initially recognised at cost and the carrying amount in the financial statements is increased or decreased to recognise the Company's share of the surplus or deficit in the joint venture after the date of acquisition. Distributions received from a joint venture reduce the carrying amount of the investment in the financial statements.

If the share of deficits of a joint venture equals or exceeds its interest in the joint venture, the Company discontinues recognising its share of further deficits. After the Company's interest is reduced to zero, additional deficits are provided for, and a liability is recognised, only to the extent that the Company has incurred legal or constructive obligation or made payments on behalf of the joint venture. If the joint venture subsequently reports surpluses, the Company will resume recognising its share of those surpluses only after its share of the surpluses equals the share of deficits not recognised.

Leases

Operating Leases

An operating lease is a lease that does not transfer substantially all the risks and benefits incidental to ownership of an asset. Payments under these leases are recognised as expenses in the Statement of Comprehensive Revenue and Expense in periods in which they are incurred. Lease incentives received are recognised.

Finance Leases

A finance lease transfers to the lessee substantially all the risks and rewards incidental to ownership of an asset, whether or not title is eventually transferred. At the start of the lease term, finance leases are recognised as assets and liabilities in the Statement of Financial Position

at the lower of the fair value of the leased item and the present value of the minimum lease payments.

The finance charge is charged to the surplus or deficit over the lease period so as to produce a constant periodic rate of interest on the remaining balance of the liability. The amount recognised as an asset is depreciated over its useful life. If there is no reasonable certainty as to whether the Company will obtain ownership at the end of the lease term, the asset is fully depreciated over the shorter of the lease term and its useful life.

Payables

Short-term payables are recorded at their fair value.

Financial Instruments

Southland Regional Development Agency is party to financial instruments as part of its normal operation. These financial instruments give rise to financial assets and liabilities and include cash and on-call deposits, accounts receivable, investments, and accounts payable, deposits held, other financial liabilities and financial guarantees. They also include equity interests in other entities.

All financial instruments are recognised in the Statement of Financial Position on the basis of Southland Regional Development Agency Limited's general and, where applicable, particular accounting policies. All financial instruments disclosed in the Statement of Financial Position are recorded at fair value or amortised cost. Revenue and expenditure arising from these financial instruments is recognised in the Statement of Comprehensive Revenue and Expense.

Statement of Cash Flows

Cash includes cash and cash equivalents as defined above.

Operating activities include cash received from all revenue sources of Southland Regional Development Agency and cash payments made for the supply of goods and services. Investing activities are those activities relating to the acquisition and disposal of non-current assets. Financing activities comprise the change in equity and debt capital structure of Southland Regional Development Agency.

Personnel Costs

Salaries and Wages

Salaries and wages are recognised as an expense as employees provide services.

Defined Contribution Superannuation Schemes

Employer contributions to KiwiSaver, the Government Superannuation Fund, and the State Sector Retirement Savings Scheme are accounted for as defined contribution superannuation schemes and are expensed in the surplus or deficit as incurred.

Employee Entitlements

Employee benefits expected to be settled within 12 months after the end of the period in which the employee renders the related service are measured based on accrued entitlements at current rates of pay. These include salaries and wages accrued up to balance date, annual leave earned to, but not yet taken at balance date. No liability is recognised for sick leave.

A liability and an expense are recognised for bonuses where Southland Regional Development Agency has a contractual obligation or where there is a past practice that has created a constructive obligation and a reliable estimate of the obligation can be made.

Changes in Accounting Policies

There have been no changes in accounting policies during the financial year.

CRITICAL ACCOUNTING ESTIMATES AND ASSUMPTIONS

In preparing these financial statements, Southland Regional Development Agency has made estimates and assumptions concerning the future. These estimates and assumptions may differ from the subsequent actual results. Estimates and assumptions are continually evaluated and are based on historical experience and other factors, including expectations or future events that are believed to be reasonable under the circumstances. The estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities recognised in the financial statements are described in the notes to the financial statements.

Shareholder requirements

STATEMENT OF INTENT

By 1 December each year Great South will deliver a draft Statement of Intent to the joint shareholders as required by the Local Government Act. The Joint Shareholders will provide feedback to the Great South Board by 1 March each year, and the final document will be delivered by 30 June each year.

REPORTING

Half Yearly Reporting

By the end of February each year the board must deliver to the shareholders a report on the organisation's operations during that half year. The report must include the information required to be included by the LGA 2002 and the Statement of Intent and any other information requested by the shareholders.

Annual Report

By the end of September each year, the board must deliver to the shareholders and make available to the public a report on the company's operations during the year. This will include audited financial statements and the performance targets and other measures by which performance was judged in relation to the organisation's objectives.

SHAREHOLDER MEETINGS

An annual general meeting will be held before the end of September each year to present the annual report. The notice of the Annual General Meeting (AGM) will be no less than 10 working days before the meeting, unless agreed by all shareholders who are entitled to attend and vote at the meeting.

SHAREHOLDER APPROVAL

Any subscription, purchase or acquisition by Great South of shares in a company or organisation require shareholder approval by special resolution as will the other matters outlined in Great South's constitution.

DIVIDEND POLICY

The Great South Board is not authorised to approve any dividends.

COMPENSATION FROM LOCAL AUTHORITIES

The Directors do not envisage any circumstances arising that would give rise to any claim from any local authority during the year other than those already stated in the financial statements.

NO SURPRISES

Great South, through the Joint Shareholders Committee will work with the shareholders to develop trust and a common understanding on a "no surprises" basis. The board will be sensitive to the demands for accountability placed on the Councils from their respective ratepayers.

PUBLIC EXPECTATIONS

Great South is very mindful of the public scrutiny that comes with being a CCO. Great South will:

- Build accountability and constructive working practices between their organisation and the shareholders.
- Commit to transparency and accountability to the public. This includes fulfilling the planning, reporting and disclosure requirements of the Local Government Act 2002 as it applies to CCOs, and the requirements of the Local Government Official Information and Meetings Act 1987 as it applies to CCOs.
- Ensure the organisation is fiscally disciplined with expenditure.
- Embrace the Shareholder Councils' strategic priorities as set out in their Long-term Plans 2018-2028 and any other relevant documents.

Great South is tasked with leading the future growth aspirations of Murihiku Southland on behalf of our shareholders, stakeholders and the wider Murihiku Southland community.

GREAT SOUTH
Southland Regional Development Agency

www.greatsouth.nz

Visit our website to find out more about us and sign up for our newsletters to receive regular updates

Mayor's Taskforce for Jobs retrospective unbudgeted expenditure

Record no: R/25/7/35305
Author: Jared Cappie, Community leadership manager
Approved by: Sam Marshall, Group manager customer and community wellbeing

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 The purpose of this report is to provide an update on the Mayors Taskforce for Jobs (MTFJ) Community Employment Programme (CEP) and gain approval for unbudgeted expenditure of $220,000 (plus GST) in 2025/2026 associated with participating in the MTFJ CEP programme. This will be funded from a grant to be received from Local Government New Zealand (LGNZ).

Executive summary

2 The MTFJ CEP is a nationwide programme led by New Zealand's mayors, aimed at ensuring all young people aged 16–25 are engaged in employment, education, training, or other positive activities within their communities.

3 The programme offers comprehensive support for both job seekers and employers. For individuals, it provides tailored employment plans, career counselling, CV and job search assistance, interview preparation, skill development, job placement services, financial literacy education, mental health support, and access to essential resources. For employers, it facilitates matched job seekers, access to grants and subsidies, training and pastoral support for new hires, as well as provision of workwear and equipment.

4 MTFJ CEP is delivered through a partnership between Local Government New Zealand (LGNZ) and the Ministry of Social Development (MSD), with a strong focus on sustainable youth employment.

5 Council had the opportunity to re-enter into an agreement with LGNZ to participate in the programme for the 2025/2026 year. Under this agreement, LGNZ will provide the funding amount to support programme delivery. Notably, the contract milestones have been updated for the 2025/2026 term, including.

- an increase in total placements from 20 to 27
- at least 80% of placements must be main benefit clients aged 18–24
- at least 70% of participants must remain in employment for a minimum of 182 days

6 The agreement allows for subcontracting, and LGNZ has formally approved Great South as Southland District Council's delivery partner for the programme. Great South brings strong existing relationships with schools, employers, and business networks, along with well established connections with LGNZ and MSD positioning them effectively to continue delivering the programme.

7 Additionally, Great South significantly exceeded expectations in the 2024/2025 contract year, achieving 34 sustainable employment outcomes against a target of 20. An increase of 70% above target.

8 The total funding available from LGNZ to Council to deliver the Mayor's Taskforce for Jobs Community Employment Programme in the 2025/2026 year is $220,000 (plus GST).

Recommendation

That Council:

a) receives the report titled "Mayor's Taskforce for Jobs retrospective unbudgeted expenditure".

b) determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002.

c) determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) Approves unbudgeted expenditure of $220,000 for delivery of the Mayoral taskforce for jobs community employment programme, undertaken by Great South to be funded from a grant received from Local Government New Zealand.

Background

9 MTFJ runs advocacy projects and partners with best practice organisations to promote the economic wellbeing of young people. Partners include MSD, Tuia, Outward Bound, and Te Pūkenga.

10 The MTFJ is governed by the Core Group which includes 17 mayors from throughout the country, and is chaired by Mayor Alex Walker of Central Hawke's Bay District Council.

11 The Core Group meet quarterly to discuss the strategy and operational works of the taskforce, as well as holding an Annual General Meeting at the Local Government New Zealand (LGNZ) conference.

12 More information can be found here https://www.mtfj.co.nz/about-us/

13 To participate in MTFJ, Council has to enter into an agreement with LGNZ who provide councils with funding to enable them to:

- employ staff to run the programme (or subcontract the work to another entity)
- support meaningful local employment outcomes focused on young people aged 16-24. This obligation applies particularly to those who are primarily clients of MSD
- provide 16-24-year old's who are not in employment, education or employment (being primarily existing participants and MSD clients 18-24 years old) with work ready support up to employment placement and then pastoral care for each participant.

14 Notably, the contract milestones have been updated for the 2025/2026 term, including;

- an increase in total placements from 20 to 27
- at least 80% of placements must be main benefit clients aged 18–24
- at least 70% of participants must remain in employment for a minimum of 182 days.

15 This agreement records the basis on which Council may receive funding under the programme. It can be subcontracted to an external entity and LGNZ has formally approved Great South as Southland District Council's delivery partner for the programme for the 2025/2026 year.

16 Great South brings strong existing relationships with schools, employers, and business networks, along with well established connections with LGNZ and MSD, positioning them effectively to continue delivering the programme.

17 Additionally, Great South significantly exceeded expectations in the 2024/2025 contract year, achieving 34 sustainable employment outcomes against a target of 20. An increase of 70% above target.

18 This success reflects the strength of our collaborative leadership model, anchored in rural job hubs, strong community partnerships, grassroots engagement, and visible mayoral leadership.

Issues

19 There are no issues to note. The programme is well established, with many councils across the country participating through agreements with LGNZ, similar to the arrangement currently in place under our existing contract.

Factors to consider

Legal and statutory requirements

20 Employment and contract legislation will apply.

Community views

21 When the programme was launched in the District in 2024, it received strong support from local communities, including employers, business networks and schools. This widespread engagement is reflected in Great South's performance, exceeding the contracted targets by 70% under the existing agreement.

22 No formal community engagement has been undertaken for the 2025/2026 contract. However, based on previous experience and outcomes, we believe the community would strongly support the continuation of the programme. It is clearly aligned with the needs of our young people and their future opportunities.

Costs and funding

23 The contract provides for $220,000 (plus GST) of grant monies to be received by Council over the 2025/2026 financial year. This is provided through LGNZ and overseen by them.

24 No budget was included in Council's 2025/2026 Annual Plan, due to the annual nature of the contract and staff seeing how the contract ran in the first year.

25 Grant monies will be received in two instalments. The first instalment will be received on receipt of a signed contract and Council sending an invoice to LGNZ. With the second instalment due on the 28 February 2026 after confirmation of 14 placements on the programme and that at least 80% of the first instalment has been committed or spent. If there are less than 14 placements, the second instalment may be pro-rated.

26 As noted, the contract will be delivered by Great South, with Great South invoicing us for the amounts received by Council at each instalment.

27 Council staff time will be required to oversee the contract, attend associated professional development and compulsory hui, but this is not expected to be significant.

Policy implications

28 N/A

Analysis

Options considered

29 Option One- agrees to retrospectively approve unbudgeted expenditure of $220,000 for delivery of the Mayoral taskforce for jobs community employment programme, undertaken by Great South to be funded from a grant received from Local Government New Zealand.

30 Option Two – do not agree to retrospectively approve unbudgeted expenditure of $220,000 for delivery of the Mayoral taskforce for jobs community employment programme, undertaken by Great South to be funded from a grant received from Local Government New Zealand.

Analysis of options

Option 1 – agrees to retrospectively approve unbudgeted expenditure of $220,000 for delivery of the Mayoral taskforce for jobs community employment programme, undertaken by Great South to be funded from a grant received from Local Government New Zealand.

Advantages	*Disadvantages*
• subcontracting to Great South allows them to build on work already underway • support meaningful local employment outcomes focused on young people aged 16- 24. This obligation applies particularly to those who are primarily clients of MSD. • provide 16-24-year old's who are not in employment, education or employment (being primarily existing participants and MSD clients aged 18-24-years old) with work ready support up to employment placement, followed by pastoral care for each participant.	• will require staff time to oversee the contract/sub-contract and attend associated professional development and compulsory hui.

Option 2 – do not agree to retrospectively approve unbudgeted expenditure of $220,000 for delivery of the Mayoral taskforce for jobs community employment programme, undertaken by Great South to be funded from a grant received from Local Government New Zealand.

Advantages	*Disadvantages*
• no extra demands on staff.	• a missed opportunity to support young people in our District through access to employment, education, and training pathways • potential risk to Great South's ability to retain staff currently employed to deliver the MTFJ CEP, due to uncertainty in funding continuity.

Assessment of significance

31 This matter is not significant in terms of Section 76 of the Local Government Act 2002.

Recommended option

32 Option 1- agrees to retrospectively approve unbudgeted expenditure of $220,000 for delivery of the Mayoral taskforce for jobs community employment programme, undertaken by Great South to be funded from a grant received from Local Government New Zealand.

Next steps

33 Oversee the subcontracting arrangement with Great South to ensure successful delivery of programme outcomes.

34 Maintain ongoing collaboration with MSD, LGNZ, and Great South to ensure the successful delivery of the programme.

Attachments

There are no attachments for this report.

Colac Bay surfer statue project - unbudgeted expenditure request

Record no: R/25/8/38163
Author: Stella O'Connor, Community partnership leader
Approved by: Sam Marshall, Group manager customer and community wellbeing

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 The purpose of this report is for Council to approve an unbudgeted expenditure of $105,000 to increase the budget for the Colac Bay Surfer Statue Project to $140,000. Acknowledging that $11,000 is to be funded from the Ōraka Aparima reserve and interest from the Riverton property sales reserve if required.

Executive summary

2 The Colac Bay surfer statue project is located on Council land and was originally budgeted in the 2022/2023 Annual Plan for a $35,000 refurbishment, funded from a loan. Following condition assessments and community consultation, the collective view emerged that the statue is beyond repair and must be replaced. The remaining budget for the project is approximately $31,325.

3 The replacement project has evolved into a collaborative initiative between Council and the Colac Bay Progress League (CBPL), who have demonstrated exceptional leadership and commitment through a significant fundraising campaign. The total project cost is now estimated at $140,000 and is proposed to be delivered in two stages, funded as following sources:

Stage one: Statue design and fabrication - $100,000

- $31,000 – carried forward to 2025/2026 from the 2024/2025 Annual Plan
- $11,000 – Ōraka Aparima Community Board rate reserve (unbudgeted expenditure request), plus interest from the Riverton Property Sales reserve if required.
- $58,000 – raised by donation through community fundraising from the CBPL.

Stage two: installation and associated works - $40,000

- $40,000 – to be fully funded by donation from the CBPL.

4 If approved, the total contribution from the Ōraka Aparima Community Board area will be $46,000 towards a $140,000 project, resulting in the creation of a purpose built, new surfer statue that honours the original, while ensuring long term durability.

5 As the replacement of the statue is capital expenditure, the community board does not have delegated authority to approve the unbudgeted expenditure. Therefore, at its August 2025 meeting, the board passed a resolution recommending that Council approves the expenditure.

6 The Ōraka Aparima Community Board reserve is expected to have a balance of $7,391 as of 30 June 2025 before interest. As this project is occurring in 2025/2026, it is possible that this reserve may have the necessary funds to fully fund this project at 30 June 2026. Any shortfall is being recommended, to be funded from interest on the Riverton Property Sales reserve. Interest on reserves may be used for any purpose.

Recommendation

That Council:

a) receives the report titled "Colac Bay surfer statue project - unbudgeted expenditure request".

b) determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002.

c) determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) notes that the Colac Bay Progress League have requested that Council continue with the delivery and management of the project and acknowledge that they remain a key partner in the process.

e) agrees to the undertaking of design work before confirmation of the balance of funding by the Colac Bay Progress League.

f) approves unbudgeted expenditure of $69,000 excluding GST for the completion of stage one of the Colac Bay surfer statue. To be funded from a donation of the Colac Bay Progress League of $58,000 and the remainder from the Oraka Aparima Community Board reserve and interest from the Riverton Property Sales reserve, if required.

g) approves unbudgeted expenditure for stage two of the Colac Bay surfer statue, totalling $40,000 excluding GST to be fully funded by the Colac Bay Progress League, subject to confirmation that full funding has been secured.

Background

7 The iconic surfer statue at the entrance to Colac Bay/Ōraka is located on Council land and has stood as a symbol of the township's strong surfing identity since its installation in 1999. Created by the local community, the statue became a beloved and iconic landmark, attracting visitors and serving as a popular photo backdrop. However, failure to fibreglass the statue, and after 25 years of exposure to the elements and damage from public interaction, the statue has deteriorated significantly.

8 Maintenance efforts over the years have been supported by both Council and the CBPL. Recent assessments and community feedback confirmed the need for full replacement.

9 The CBPL, in partnership with the community board and Council staff, has led the concept to replace the statue with a replica that remains faithful to the original design. The Colac Bay community has expressed a strong desire to retain the iconic image of a surfer riding a wave, which they see as integral to Colac Bay's identity.

10 In response to the current situation, the CBPL has committed to a significant fundraising effort. To date, they have raised a remarkable $58,000 and are seeking to implement a staged approach to the project to enable procurement and design to begin while continuing to raise funds for installation. The proposed project is now valued at $140,000, split into two stages:

- Stage one: design and fabrication $100,000. Funded by the remaining $31,325 community board loan, $11,000 from the Oraka Aparima Community Board reserve and the interest from the Riverton Property Sales reserve if required, and $58,000 donated from the CBPL.
- Stage two: removal and installation $40,000. To be fully funded by the CBPL through ongoing fundraising efforts.

11 The Council's project delivery team has confirmed that the project can be split into two stages, allowing procurement to begin for design only and providing the CBPL with accurate cost estimates to support further fundraising. The tender for stage one can include a delayed production start to avoid storage issues until the funding for stage two is secured.

12 The surfer statue project (P-11076) was originally budgeted in the 2022/2023 Annual Plan and has since been carried forward, with the current loan funded balance of $31,325 now allocated to the 2025/2026 financial year. The reserve funding identified as being available for an unbudgeted expenditure request is interest on the Riverton Property Sales reserve, this can be used for any purpose, the Ōraka Aparima Community Board reserve had a balance of $10,765 as of 30 June 2024. This Oraka Aparima reserve will receive interest in the year ended 30 June 2025.

13 The CBPL has indicated a preference for Council to manage the project, with the CBPL acting as a key partner in the design and delivery process.

Issues

14 Stage two approval will need to be subject to securing the necessary funding. The tender for stage one can include a delayed production start until the funding for stage two is secured.

Factors to consider

Legal and statutory requirements

15 Resource consent variation is required and dependant on the new design. Note that state highways will be a notified party.

16 The building team have indicated a need for a structural engineer to verify the existing foundation and oversee construction monitoring for building consent exemption.

17 As the replacement of the statue is capital expenditure, the community board does not have the delegated authority to approve unbudgeted expenditure. Therefore, at its August 2025 meeting, the board passed a resolution recommending that Council approve the expenditure.

Community views

18 The views of the community board are deemed to represent the views of the wider community. The CBPL have received extremely positive engagement on the project during fundraising efforts.

Costs and funding

19 The Colac Bay surfer statue project is located on Council land and was originally budgeted in the 2022/2023 Annual Plan for a $35,000 refurbishment, funded from a loan. Following condition assessments and community consultation, the collective view emerged that the statue is beyond repair and must be replaced.

20 The proposed project is now valued at $140,000, split into two stages

- Stage one: design and fabrication $100,000. Funded by the remaining loan available of approx $31,000, $11,000 from the Ōraka Aparima reserve and if required, interest on the Riverton Property sales reserve, and $58,000 from the CBPL.
- Stage two: removal and installation $40,000. To be fully funded by the CBPL through ongoing fundraising efforts.

21 The surfer statue project (P-11076) was originally budgeted in the 2022/2023 Annual Plan and has since been carried forward, with the current remaining approximate loan funding balance of $31,000 now allocated to the 2025/2026 financial year.

22 The Ōraka Aparima Community Board reserve is expected to have a balance of $7,391 as of 30 June 2025 before interest. As this project is occurring in 2025/2026, it is possible that this reserve may have the necessary funds to fully fund this project at 30 June 2026. Any shortfall is being recommended to fund from interest on the Riverton Property Sales reserve. Interest on reserves may be used for any purpose.

23 The Riverton Property Sales Reserve will have an approximate balance of $155,475 at 30 June 2025 before interest. Staff are still currently finalising the 30 June 2025 Annual Report. The original monies in this reserve came from property sales when Wallace County existed with interest being added over a number of years. Interest is not subject to any restrictions for use and is being suggested in this case to support any shortfall that may exist at the end of next year when the funding of this project is finalised.

24 If approved, then the total cost to the Ōraka Aparima community board area will be $46,000 of a total $140,000 project.

25 The proposed new design is expected to have a 30 plus year estimated life expectancy with minimal maintenance costs during that period. A memorandum of understanding will be entered into with the CBPL to cover the ongoing maintenance costs and has been agreed to in principle verbally.

Policy implications

26 The current statue is located at 11 Colac Bay Road, Colac Bay and the property is owned by Council. An application to construct on Council property will need to be applied and approved.

Analysis

Options considered

27 There are three options available to Council:

- approves the increased project budget for the Colac Bay surfer statue, manage the delivery of the project and approve the unbudgeted expenditure request of $100,000 excluding GST for stage one. This stage is to be funded from the $31,000 loan allocated in the 2025/2026 Annual Plan, $58,000 donation raised by the Colac Bay Progress League through community fundraising, and $11,000 from the Ōraka Aparima Community Board reserve and interest on the Riverton Property Sales reserve, if required. Stage two of the Colac Bay surfer statue, totalling $40,000 excluding GST is to be fully funded by the Colac Bay Progress League, subject to confirmation that full funding has been secured.
- decline the increased project budget for the Colac Bay surfer statue.
- approve the increased project budget for the Colac Bay surfer statue, manage the delivery of the project and approve the unbudgeted expenditure request of $100,000 excluding GST for stage one. This stage is to be funded from the $31,000 loan allocated in the 2025/2026 Annual Plan and $69,000 donation raised by the Colac Bay Progress League through community fundraising. Stage two of the Colac Bay surfer statue, totalling $40,000 excluding GST to be fully funded by the Colac Bay Progress League, subject to confirmation that full funding has been secured.

Analysis of options

Option 1 – approve the increased project budget for the Colac Bay surfer statue, manage the delivery of the project and approve the unbudgeted expenditure request of $100,000 excluding GST for stage one. This stage is to be funded from the $31,000 loan allocated in the 2025/2026 Annual Plan, $58,000 donation raised by the Colac Bay Progress League through community fundraising, and $11,000 from the Ōraka Aparima Community Board reserve and interest on the Riverton Property Sales reserve, if required. Stage two of the Colac Bay surfer statue, totalling $40,000 excluding GST to be fully funded by the Colac Bay Progress League, subject to confirmation that full funding has been secured.

Advantages	*Disadvantages*
• ensures full project delivery with Council oversight, providing consistency, accountability, and project management expertise • supports community aspirations and maintains momentum for a well supported local initiative • enables procurement of design to begin immediately, helping CBPL secure further funding for stage two.	• increases community board's financial commitment • reduces the available balance in the Ōraka Aparima reserve, limiting flexibility for other projects.

Option 2 – decline the increased project budget for the Colac Bay surfer statue

Advantages	*Disadvantages*
• no financial or operational impact on Council or the community board reserve.	• will lead to community dissatisfaction and loss of momentum for a well supported local initiative • will leave a dilapidated surfer statue in situ • could damage the relationship between Council and the Colac Bay community.

Option 3 – approve the increased project budget for the Colac Bay surfer statue, manage the delivery of the project and approve the unbudgeted expenditure request of $100,000 excluding GST for stage one. This stage is to be funded from the $31,000 loan allocated in the 2025/2026 Annual Plan and $69,000 donation raised by the Colac Bay Progress League through community fundraising. Stage two of the Colac Bay surfer statue, totalling $40,000 excluding GST to be fully funded by the Colac Bay Progress League, subject to confirmation that full funding has been secured.

Advantages	*Disadvantages*
• less financial or operational impact on Council or the community board reserve • places full responsibility for project delivery and risk management on the CBPL.	• potential for inconsistent quality or non compliance with Council standards • may result in delays or complications due to lack of project management expertise or capacity • likely to halt or significantly delay the project due to insufficient funding and lack of support • may lead to community dissatisfaction and loss of momentum for a well supported local initiative • could damage the relationship between Council and the Colac Bay community.

Assessment of significance

28 Not considered significant.

Recommended option

29 Option one - approve the increased project budget for the Colac Bay surfer statue, manage the delivery of the project and approve the unbudgeted expenditure request of $100,000 excluding GST for stage one. This stage is to be funded from the $31,000 loan allocated in the 2025/2026 Annual Plan, $58,000 donation raised by the Colac Bay Progress League through community

fundraising, and $11,000 from the Ōraka Aparima Community Board reserve and interest on the Riverton Property Sales reserve, if required. Stage two of the Colac Bay surfer statue, totalling $40,000 excluding GST to be fully funded by the Colac Bay Progress League, subject to confirmation that full funding has been secured.

Next steps

30 After Council approval, staff will proceed to progress the staged project by starting on stage one and scoping for stage two.

Attachments

There are no attachments for this report.

Ohai Recreation Reserve - Te Oruanui Incorporated

Record no: R/25/8/37723
Author: Megan Cowley, Senior property advisor
Approved by: Sam Marshall, Group manager customer and community wellbeing

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 This report is to inform Council of the happenings at the Ohai recreation reserve and the Council owned building that is situated on this land.

2 Staff are requesting that Council approve the transfer of the Council owned building to Te Oruanui Incorporated and to enter into a land lease with this same entity.

Executive summary

3 The Marae building (ex-rugby club building) on the Ohai recreation reserve defaulted into Council ownership when Te Oruanui Incorporated (TOI) ended their land lease as the entity was dissolved.

4 Te Oruanui Marae Ohai Incorporated (TOMOI) which is a new entity that was set up, is currently occupying the Council owned building on the Ohai recreation reserve and has been paying the service charges since 1 July 2023.

5 TOMOI originally requested that Council consider entering into a new land lease with them and to transfer the building to TOMOI. However, TOMOI has now arranged for the re-registering of TOI, and as a result, over time will dissolve their current entity.

6 The Wallace Takitimu Community Board, at its meeting on 7 August 2025, resolved to recommend to Council that the building be transferred to TOI and a deed of lease for the land the building sits on, be entered into with TOI. Both of which are contingent upon TOI paying a portion of the outstanding service charges.

Recommendation

That Council:

a) receives the report titled "Ohai Recreation Reserve - Te Oruanui Incorporated".

b) determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002.

c) determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) acknowledges the recommendation of the Wallace Takitimu Community Board and resolves that the ex-marae building located on the Ohai Recreation Reserve is transferred back to Te Oruanui Incorporated for $1.00.

e) delegates to the chief executive, the authority to execute any documents to achieve the transfer of the ex-marae building located on the Ohai Recreation Reserve.

f) notes that the transfer is contingent on Te Oruanui Incorporated agreeing to pay $6,540.38 in outstanding service charges.

g) approves unbudgeted expenditure of up to $2,000 plus GST to cover the legal costs and disbursements for the transfer of ownership of the Marae building back to Te Oruanui Incorporated, to be funded from the Ohai general reserve.

Background

7 Previously, the Ohai Rugby Club had owned and occupied a building on a portion of Council owned land at 21 Hastings Street, Ohai, known as the Ohai recreation reserve. The area occupied by the building is shown and defined on the aerial map of the Ohai recreation reserve in attachment A.

8 In 1994, the rugby club rooms were sold to TOI and Council subsequently leased the land to them on 1 December 1999.

9 The previous land lease agreement with TOI stipulated an annual rental charge of $124.20 including GST, with TOI responsible for all the service charges and outgoings, with a term of 10 years and a further renewal of nine years and 363 days.

10 The 'rolling over' land lease with TOI - a standard occurrence pending negotiations/discussions about a new lease (and outstanding service charges) - came to an end due to TOI no longer existing as a legal entity. TOI was officially dissolved on 19 August 2021 (as declared in Gazette Notice 2021-is3481).

11 As per the terms of the lease, the ownership of the building reverted to Council for nil consideration. This has been confirmed by legal advice received on 18 August 2023 from Council's lawyers.

12 TOI left unpaid service charges for water and sewerage in the amount of $9,328.37.

13 Te Oruanui Marae Ohai Incorporated (TOMOI) was formed in September 2023, and they are currently using the building vacated by TOI, with no lease in place with Council for the building or the land. It should be noted that they are paying the service charges for the building since 1 July 2023.

14 On 13 February 2025, staff initially sought feedback from the Wallace Takitimu Community Board for an appropriate land lease rental/term and a recommendation to pass on to Council regarding a possible transfer of the ex-marae building. This report was tabled pending a request for further information.

15 Since that date, TOMOI have advised in a letter dated 24 June 2025 (attachment B) that they were in the process of re-registering Te Oruanui Incorporated (TOI), as they are the former legal owner of the building and the Maori reservation land adjacent to the Council reserve.

16 A search of the societies register has confirmed that Te Oruanui Incorporated (TOI) has now been re-registered on 26 June 2025.

17 The re-registered society – TOI, have agreed to pay their liable portion of the outstanding service charges being $6,540.38.

18 A deed of lease for the land needs to be entered into to ensure that both Council and TOI are in agreeance with the continued use and occupation of the land.

19 Standard terms and conditions in a deed of lease agreement include;

- Lessee will pay all outgoings including service charges and insurance
- rent will be reviewed every five years
- the Lessee will not assign, transfer or sublet the premise or land without the consent of the Lessor
- the Lessee is to hold a public liability insurance policy in the joint names of the Lessee and Lessor throughout the term of the lease.

20 The Ohai recreation reserve is non rateable however, service charges are still required to be paid.

21 Currently the ex-marae building has service charges of 5 x wastewater units (at $928.89 per unit/pan) and 1 x water meter charges (at $901.36 per unit). This equates to $5,545.81 for the 2025/2026 rating year.

22 On 7 August 2025, the Board was presented with this updated information to consider and to provide recommendations to Council.

Issues

23 TOI has requested to purchase the building from Council. The building can be sold, and the Council is being asked to consider a transfer of the building to TOI.

24 If the resolution is to transfer the building, then staff would consider it appropriate that the building be sold for a nominal fee ($1). This is due to.

- the building came into Council ownership at no cost via the demise of (the original) Te Oruanui Inc
- the ongoing costs associated with ownership of the building i.e., insurance, electricity, repairs and maintenance
- the annual service charges that TOI would have to pay (to $5,545.81 for the 2025/2026 rating year.)

25 Staff are recommending that a deed of lease for the land is entered into with TOI and that the commencement date coincides with the settlement date of a sale and purchase agreement of the building.

Factors to consider

Legal and statutory requirements

26 The Ohai recreation reserve is legally known as Lot 50 DP 2656, Lot 1 DP 2858, Part Lot 1 DP 2657 of 22 of Sec 94 Blk III Wairio.

27 Section 54 (1) (a) of the Reserves Act 1977 allows for a land deed of lease to be entered into for 'other facilities' on a recreation reserve, for a term not exceeding 33 years.

28 Under the Reserves Act 1977, a deed of lease must be publicly notified, if it is not in conformity with and contemplated by the approved district wide reserve management plan. The current Ohai recreation reserve management plan does not contemplate a marae building on this reserve. The public notification period is for one month and allows for submissions and/or objections to be submitted.

Community views

29 At the Wallace Takitimu Community Board meeting held on 7 August 2025, the recommendation to Council was.

That the Wallace Takitimu Community Board:

a) receives the report titled "Ohai Recreation Reserve - Te Oruanui Incorporated".

d) recommends to Council staff that a land lease is entered into with Te Oruanui Incorporated for the portion of the Ohai Recreation Reserve that the Marae building is situated on, for an annual lease of $100.00 plus GST.

e) recommends to Council that the Marae building located on the Ohai Recreation Reserve is transferred back to Te Oruanui Incorporated for $1.00.

f) notes that resolutions d) and e) are contingent on Te Oruanui Incorporated agreeing to pay $6,540.38 in outstanding service charges.

30 The community board has had several meetings with TOMOI, now TOI, and has always been supportive of the building being transferred back into the committee's ownership, pending an agreement being reached on settlement of the outstanding service charges.

Costs and funding

31 There will be legal costs associated with conveyancing fees if the building is to be sold/transferred. The quote for Council's legal cost is estimated to be $2,000.00 plus GST and disbursements, the cost shall be funded via the Ohai general reserve.

32 As at 30 June 2025, the Ohai general reserve had a balance of $217,869.51.

33 The board is supportive of funding these costs from the Ohai general reserve.

Policy implications

34 There are no policy implications.

Analysis of options

Option 1 – Transfer the building preferentially to the current occupiers of the building, TOI, for $1.00 and enter into a land lease with them.

Advantages	*Disadvantages*
• Council will not be responsible for the costs of owning the building • a transfer allows for the continued use of the building by the community.	• Council will not be able to develop or utilise the land under the building until the lease expires.

Option 2 – Keep the building in Council ownership and lease the building and land to TOMOI.

Advantages	*Disadvantages*
• Council will maintain ownership of the asset.	• Council will have an asset that will come with associated costs, but these are usually passed on to the Lessee.

Assessment of significance

35 Not significant.

Recommended option

36 Transfer the building preferentially to the current occupiers of the building, TOI, for $1.00 and enter into a land lease with them.

Next steps

37 If the decision is to transfer the building, then staff are to confer with the chief executive on this matter and to also instigate negotiations for a deed of lease for the land.

Attachments

A GIS Team - Aerial View of Ohai Recreation Reserve. ⇩
B Update from Te Oruanui Ohai Marae Committee - July 2025 ⇩

OUTHLAND
ISTRICT COUNCIL

Legend

- Marae Building
- Ohai Recreation Reserve
- Parcels

Ohai Recreation Reserve

0 30 60 90

Metres

N W E S

Map Scale 1:850
Map Date 21 January 2025

_Projects\Property_Management\SR-57220 - Aerial Map for Comm Board Report\SR-57220_Aerial_Map_for_Comm_Board_Report_Ohai_Rec_Res.aprx

Prepared by the SDC Property & Spatial Dep

Te Oruanui Marae Ohai Incorporated

21- 25 Hastings Street Ohai 9635
KO HINERAUPITO TE WHAREKAI
KO NGĀ URI O TE IKA A MAUI TE WHARENUI

teoruanuimarae@gmail.com

24th June 2025

To:
Tony Philpott, Chair – Wallace Takitimu Community Board

CC:
Cameron McIntosh, Chief Executive – Southland District Council
Mayor Rob Scott

RE: Response to Revised Proposal Regarding Wharekai Ownership and Lease

Tēnā koutou,

Thank you for your letter dated 12 May 2025, outlining the revised proposal from the Wallace Takitimu Community Board regarding the ownership and lease of the Wharekai building and land in Ohai.

We appreciate the consideration and goodwill shown by the Board and Council in reviewing the situation and reducing the amount payable from $9,328.37 to $6,540.38, recognising the period in which Council held responsibility for the building. We are encouraged by the shared commitment to supporting the Marae and the wider community.

We are writing to confirm that we wish to move forward with leasing the land and purchasing the building, under the terms you have proposed. However, we respectfully ask for your continued patience as we work through an important legal process that is temporarily holding us back.

As outlined in our earlier correspondence and legal advice, Te Oruanui Incorporated Society (TOIS) — the former legal owner of the Wharenui and the Māori reservation

land at Lots 51, 52, and 53 DP 2656 — was deregistered in 2022. It is this former entity that incurred the original debt of $9,328.37.

We acknowledge that TOIS is responsible for this debt, and we are taking active steps to address it. To proceed correctly and lawfully, TOIS must be restored and re-registered. We are currently reaching out to former TOIS members to call a Special General Meeting to elect new officers. Once this is complete, TOIS will be reinstated, its debts will be formally reviewed and settled, and its trustee role in relation to the whenua can be restored through the Māori Land Court.

Our long-term plan is to have TOIS resume legal responsibility for the land and buildings, allowing Te Oruanui Marae Ohai Incorporated (TOMOI) to wind down and transfer operations back to the original entity, as both share the same kaupapa and vision for the future of the marae.

In light of this, we respectfully request the following:

1. That the current offer made to TOMOI — to purchase the Wharekai building for $6,540.38 and lease the land for $120 per annum — be extended to TOIS once it is formally reinstated.
2. That the payment of this can be agreed upon and the final settlement of the historical debt originally incurred by TOIS, with no further financial claims or obligations relating to this debt to be pursued once this amount is paid.

We are committed to completing this process properly and in good faith, and we are working with urgency and integrity to resolve the historical legal and financial matters so we can focus on our future as a thriving, community-led marae.

Thank you again for your continued support and for working with us in the spirit of partnership. Together, we can ensure that Te Oruanui Marae continues to stand as a taonga for our whānau and the wider Murihiku community for generations to come.

Nā mātou noa, nā

Conrad Waihape
Chairperson
Te Oruanui Marae Ohai Incorporated

Spatial Plan Update - August 2025

Record no: R/25/7/35912
Author: Theresa Cavanagh, Intermediate policy analyst
Approved by: Vibhuti Chopra, Group manager strategy and partnerships

☐ Decision ☐ Recommendation ☒ Information

Purpose

1 Provide an update on progression of the Spatial Plan project.

Executive summary

2 **Rakiura / Stewart Island Community Spatial Plan**
Underway

3 **Aparima & Ōraka / Riverton & Colac Bay Community Spatial Plan**
Currently discussing with the Ōraka Aparima Community Board

Recommendation

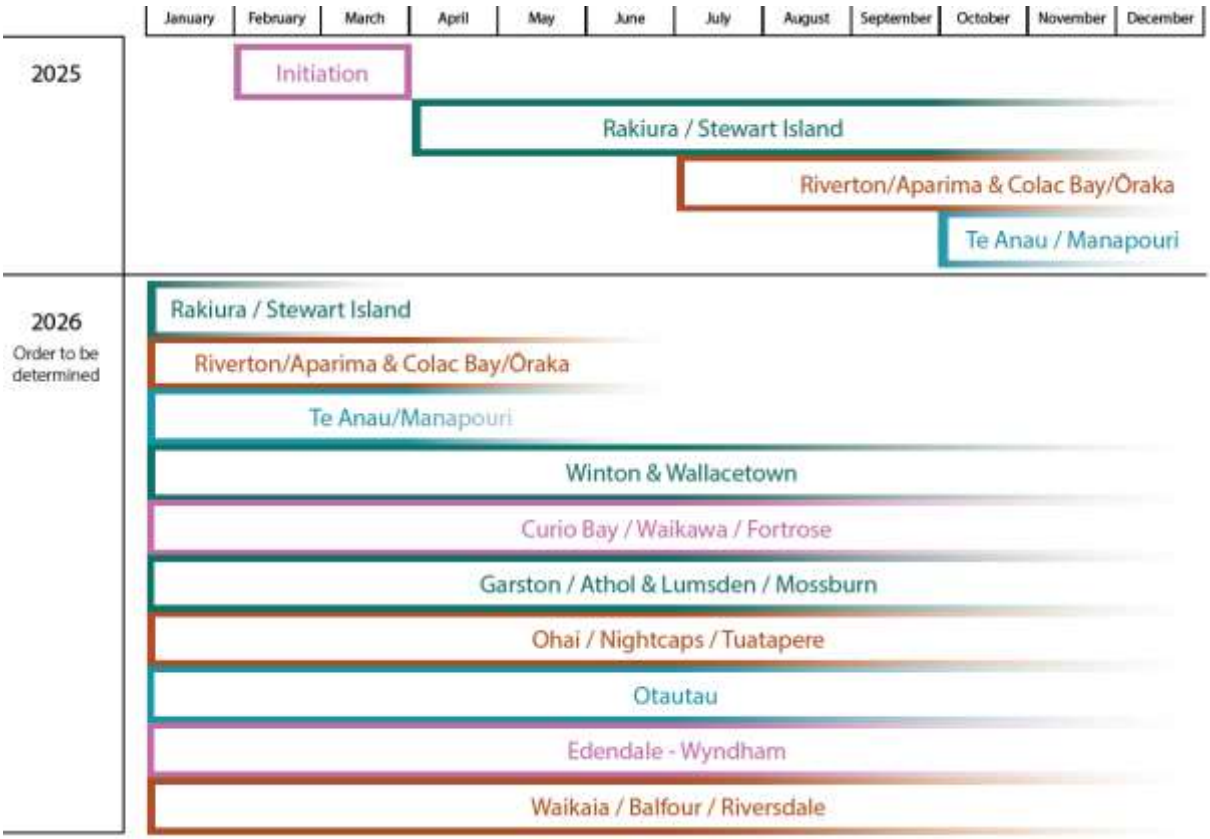
That the Council:

a) receives the report titled "Spatial Plan Update - August 2025".

Background

4 A Council report on 5 March 2025 detailed the initiation of Spatial Planning.

5 The sequence of the Community Spatial Plans is provided in the table below.



Issues

6 **Underway (Project)**

Communications
First Edition and Website. Will increase presence as direct community engagement is undertaken.

Procurement
Procurement for specialist expertise is underway

7 **Underway (Rakiura)**

Engagement
Ongoing discussions with the Community Board, meeting with stakeholders, drop-in sessions with the community on 9th September.

Data Collation/Constraints Map
Confirming datasets that will feed into the process.

Housing & Business Capacity Assessment
Great South have been engaged to undertake this assessment for Rakiura. This has three layers:
1. Demand - determine population projections which is extrapolated into housing need, to determine demand. Discussions with business to determine demand.
2. Capacity – what is the current zoned capacity which is supported by infrastructure and is feasible to build
3. Sufficiency – by comparing demand and capacity, it can be determined if there is sufficient land to meet demand, and how much additional land is required.

8 **Upcoming (Rakiura)**

Scenario Development
Options for development and/or growth will be developed by collating community and stakeholder feedback, constraints mapping and the findings of the Housing & Business Capacity Assessment. The scenarios will go out to the community for consultation.

Draft Spatial Plan
A draft Spatial Plan will be developed taking into account feedback from the Scenario consultation. The Draft Spatial Plan will also go out for public consultation.

9 **Underway (Ōraka & Aparima / Riverton & Colac Bay)**

Engagement
Community Board workshop was scheduled for 20th August but had to be rescheduled (date to be confirmed) which will include a discussion on timelines for the process going forward.

Next Steps

10 Provide Council with a further update in early 2026.

Attachments

There are no attachments for this report.

Management report August 2025

Record no: R/25/3/13461
Author: Maiyan Maher, Executive assistant
Approved by: Vibhuti Chopra, Group Manager Strategy and Partnerships/Acting Chief Executive

☐ Decision ☐ Recommendation ☒ Information

Forest and Bird lose appeal

1 Forest and Bird's appeal against Council allowing a mining company to access its land to explore further mining opportunities has been lost in the Appeal Court.

2 Forest and Bird believed Council's decision to enter into an access agreement with New Brighton, a subsidiary of Bathurst Resources Ltd in 2021, was unlawful, unreasonable, and it sought an order to quash the decision. The High Court did not agree - in March 2023 it said Council's decision was lawful, and that Council did not act unreasonably. Forest and Bird appealed that decision, and the Court of Appeal found against Forest and Bird again when it released its decision in July this year. Forest and Bird was instructed to pay costs.

Information services

3 Applications and systems: The applications team achieved significant milestones in cost recovery and process improvement. The property file charging system, launched successfully on 1 July, immediately demonstrated its effectiveness with a 50% reduction in daily requests. This substantial decrease validates the cost recovery approach while reducing the cost on ratepayers. The team also completed development of a new building compliance certificate process, establishing proper application procedures and charging structures for liquor licence prerequisites that previously lacked formal processes.

4 The trial of text message reminders was successful with more than 800 registrations processed from the 1,400+ sent out via machine - previously this was done one by one, so this is increasing the efficiency dramatically.

5 Technology and infrastructure: Starlink deployments were completed across multiple locations, with the mobile services van and district connectivity showing significant performance improvements over the previous 4G solution (where there was often no coverage). The mobile services van can now operate effectively with a simple laptop, eliminating the need for dedicated devices.

6 Telephony implementation reached operational status, with physical phones now functional and ready for broader deployment.

7 Geospatial: Community housing digitisation was finalised, converting dimension sketches to digital format for improved accessibility and management. Property amendments for financial year-end were completed, ensuring accurate records and reporting. Bylaw maps were delivered to the policy team, supporting regulatory compliance and decision-making processes.

8 The GIS platform received comprehensive upgrades to the enterprise portal and desktop GIS programme, ensuring compliance with modern standards and the upcoming website audit. Data quality improvements were achieved. A special layer was developed to track weekly parcel changes in the LINZ system, closing critical gaps between Pathway GIS and LINZ systems.

9 Major consultation phases were completed for both the reserve management plan which started public consultation on 1August, and the spatial plan township urban community meeting being held on 9 September.

10 Information management and quality: A customer satisfaction feedback system was implemented through the information services toolset enhancements, providing structured mechanisms for quality assessment and continuous improvement.

11 Data and analytics: A MetaBase dashboard registry was implemented using Confluence, providing better tracking and reducing dependencies on the legacy DataMart (which is used to provide Council with dashboards and analytics).

12 Security and compliance: Penetration testing was conducted with results providing clear direction for security improvements. Phishing awareness training proved highly effective, with QR code-specific education resulting in zero QR code compromises during subsequent testing phases.

Communications and engagement

13 Elections: Much of the focus of the team has been around elections and the three campaigns within this.

14 Filming of candidates was carried out over the week of 11-15 August. Videos will be available on our website on 25 August.

15 Radio/online/print advertising is now focused on promoting voting, ahead of voting opening on 9 September.

16 Spatial planning: Collateral is being developed for the drop-in session on Rakiura on 9 September.

17 Website audit: The team is reviewing search engine optimisation, performance, best practice, and accessibility on all pages on Council's website. Staff are auditing more than 400 pages to check on these issues.

Governance

18 Elections: Council has completed the nomination process for the 2025 local government elections. There are 10 contested areas and nine where candidates have been elected unopposed). It is possible a byelection may still occur.

19 The team has been given final sign off on the 2025 local election voting papers and candidate booklet. Voting papers will start being delivered and voting starts from 9 September.

20 Delegations update: The team has completed the latest round of edits/updates to the Delegations Manual.

Strategic planning and policy

21 Strategic planning: The District Plan Change 2 appeal process is underway, with Council engaged in negotiation with Federated Farmers NZ to resolve the FFNZ appeal. A proposal has been developed and passed initial legal consideration. Parties are required to report back to the court on progress by 16 September.

22 The Plan Change 3 hearing is scheduled for 28-29 August.

23 The Plan Change 4 is progressing to notification. It will be limited notification; a list of affected parties has been proposed to the proponent. On confirmation of this list, affected parties will be contacted, likely in the next fortnight.

24 Submissions have been made (attached) on behalf of Council on the resource management reform phase 2 national direction, Going for Housing Growth and the Climate Change Reductions (Emissions Trading Scheme – Forestry Conversion) Amendment Bill.

25 Spatial planning: Community engagement is scheduled for Rakiura (9 September), and a meeting is scheduled with the Ōraka Aparima Community Board for Wednesday, 20 August. Considerable work has been done to provide mapping for use in engagement sessions and what has emerged from this process is that coastal natural hazard information in Southland is not up to date and has not been progressed for incorporation in any Council planning processes.

26 Climate change: The Regional Framework for Action, supported by Te Ao Marama, has been adopted by councils in the Southland region. The Organisational Climate Risk Assessment is in progress.

27 Oganisational policy: The draft Dog Control Bylaw and Policy development process is underway, with consultation complete at this time. The review of the Local Alcohol Policy is underway. Review of the Heritage Joint Committee approach and service delivery is also underway.

Recommendation

That Council:

a) receives the report titled "Management report August 2025".

Attachments

A Submission to the Environmental Committee Climate Change Response ⇩
B Going for Housing Growth response - August 2025 ⇩
C RMA Phase 2 combined Southland District Council submissions ⇩
D A3 activity summary - services and libraries ⇩
E A3 activity summary - community facilities ⇩
F A3 activity summary - consenting ⇩
G A3 activity summary - environmental health and compliance ⇩
H A3 activity summary - building solutions team ⇩
I A3 activity summary - three waters ⇩
J A3 activity summary - transport ⇩
K A3 activity summary - project delivery team ⇩

Southland District Council Submission

Submission to the Environmental Committee Climate Change Response (Emissions Trading Scheme—Forestry Conversion) Amendment Bill

Executive Summary

Southland District Council acknowledges the Government's intent to protect productive farmland through the Climate Change Response (Emissions Trading Scheme—Forestry Conversion) Amendment Bill, which is scheduled to come into force on 31 October 2025. However, the Council has significant concerns that the proposed measures may contribute to continued large-scale afforestation in Southland and that insufficient attention has been paid to likely negative economic impacts in our region.

Key Recommendations:

1. **Redefine the 25% allowance calculation:** amend Section 6 definition and Section 190KA to specify that calculations should be based on the gross area of the proposed afforestation boundary, including all areas within that boundary (both forestry-suitable and non-useable areas), to ensure a true 25% limitation of farm area.
2. **Extend the "farming purposes" definition:** amend Section 6 definition of "unfarmed land" to extend the farming cessation period from 5 years to 10-15 years, which may represent a sufficient barrier to discourage foresters from acquiring full farms for conversion, though the optimal timeframe is difficult to determine due to the lack of comprehensive regulatory impact assessments and insufficient consultation time on this Bill.
3. **Prohibit high wilding potential species:** amend Section 6 definitions of "Crown afforestation land" or "restricted forest land" to prohibit wilding species utilization on Crown Land, or prohibit all wilding species from registration in the ETS system entirely.
4. **Amend mixed-species forest provisions** amend Section 6 definition of "restricted forest land" clause (b) to define restrictions based on a clear threshold of exotic forest species area or trees (e.g., "contains more than 25% exotic forest species by area") rather than the undefined "predominantly" test, which creates uncertainty and circumvention opportunities.
5. **Narrow the transitional exemption provisions** (amend Schedule 1AA, Part 5, Section 46 definition of "qualifying forestry investment") to require substantial, irreversible commitments rather than allowing broad preliminary activities to qualify as "qualifying forestry investment."
6. **Conduct comprehensive coordinated regulatory assessment** examining the combined effects of this Bill, Climate Change (Forestry) Amendments to the NZ ETS, and National Environmental Standards for Commercial Forestry changes to understand cumulative impacts on land use patterns and regional economies before implementing any of these changes.

While the Council supports protecting productive farmland, the current Bill provisions contain significant loopholes that will continue to incentivize large-scale afforestation to the detriment of Southland's agricultural economy and rural communities.

Detailed Submission

The Southland Region Context

Southland District Council represents a region where agriculture forms the backbone of the local economy. Southland District hosts approximately 5% of New Zealand's commercial forestry, and while this may appear modest in national terms, the scale and concentration of forestry activities within our district creates significant localised impacts. Commercial forestry operations frequently border environmentally sensitive areas including national parks, conservation land, and Outstanding Natural Features and Landscapes, creating complex management challenges.

The Council has witnessed first-hand how ETS incentives have driven the conversion of productive farmland into pine plantations, with the Government noting that "300,000 hectares of farmland were sold off for carbon credits" nationwide. Recent economic analysis demonstrates the unprecedented financial pressure driving this change: carbon forestry generates 32% internal rates of return compared to 6.3% for production forestry, while permanent exotic forests generate three times greater economic return per hectare than sheep and beef farms at $35 per tonne carbon prices, rising to greater returns at $70 per tonne.

Our communities have expressed overwhelming negative sentiment regarding forestry expansion, particularly concerns about full farm conversions and the erosion of rural settlements. The economic implications are profound - every 1,000 hectares converted eliminates approximately 7,700 stock units, directly reducing local economic activity through decreased demand for farm services, reduced processing volumes, and diminished rural employment.

The 25% Allowance Calculation Methodology (Section 6 - Definition of "25% allowance" and Section 190KA)

Provision: Section 6 defines the "25% allowance" as "an area or areas of restricted forest land that are in total up to 25% of all areas of LUC class 1–6 land within the farm boundary." Section 190KA requires applications to "identify the restricted forest land for each individual farm" but does not specify how areas unsuitable for forestry within the forested boundary should be treated in the calculation.

Council's Concern: The current methodology does not account for non-useable areas within the afforested boundary that cannot actually be used for forestry purposes. Under existing National Environmental Standards for Commercial Forestry, areas within any forestry operation must be excluded from planting, including waterbody setbacks, property boundary setbacks, and other constrained areas. In Southland District Council's review of afforestation notices, these non-useable areas can represent a small percentage in some sites, but a significant proportion of the total area in others.

This creates a misleading calculation where foresters can claim compliance with the 25% limitation while effectively removing a much larger proportion of the farm's economic productive capacity. Areas within the afforested boundary that cannot be planted (such as waterbody setbacks, property boundary setbacks, infrastructure corridors, and constrained land) still prevent continued agricultural use, meaning the farmer loses access to potentially 30-40% of their productive land while the forester only "uses" 25% for actual tree planting.

Recommendation: Amend Section 6 and Section 190KA to specify that the 25% allowance calculation should be based on the gross area of the proposed afforestation boundary, including all areas within that boundary (both forestry-suitable and non-useable areas). This would ensure the allowance represents a true 25% limitation of the farm area and accurately reflects the actual displacement of agricultural land use.

Southland District Council Submission

"Farming Purposes" Definition and the 5-Year Cessation Period (Section 6 - Definition of "unfarmed land" and exemption in "restricted forest land" definition)

Provision: Section 6 defines "unfarmed land" as land where: "(a) [no land described in the record of title] has been used for farming purposes in the 5-year period before the ETS application; and (b) contains predominantly exotic forest species planted in the 5-year period after use of the land for farming purposes ceased." Under the definition of "restricted forest land" in Section 6, "unfarmed land" is specifically exempted from the Bill's restrictions.

Council's Concern: The 5-year cessation period creates a significant loophole that enables strategic gaming of the system. Forestry investors, whose business models span 90-100+ years for standard rotations and indefinitely for permanent forests, can easily accommodate a 5-year delay in planting to access higher carbon credit values. Given that carbon forestry generates 32% internal rates of return compared to 6.3% for production forestry, and permanent exotic forests can generate three to seven times greater economic returns than sheep and beef farming depending on carbon prices, this timeframe is insufficient to deter large-scale farm conversions.

The Government's own regulatory impact assessment for the Bill validates the Council's concerns and supports longer timeframes. The RIS analyzed three options for determining when land qualifies as "unfarmed": 4 years, 10 years, and 20 years. The assessment concluded that both 10-year and 20-year options would be "more effective at correctly identifying unproductive land" and provide "greater certainty in correctly identifying unproductive land" compared to shorter timeframes.

For permanent forests specifically, the acquisition of long-term carbon credits represents a long-term investment profile where delaying planting by 5 years poses no unreasonable commercial hurdle. This provision will continue to incentivize the purchase and conversion of large farms to plantation forestry, undermining the Bill's stated intent to protect productive farmland.

Recommendation: Extend the farming cessation period to 10-15 years, which may represent a sufficient barrier to discourage foresters from speculatively acquiring full farms for conversion. This recommendation aligns with the Government's own regulatory impact assessment, which suggested 10-year and 20-year timeframes. The Government's analysis demonstrates they are aware that longer timeframes provide better policy outcomes, yet they have chosen a 5-year period that creates obvious gaming opportunities. A longer period would create genuine uncertainty about the viability of strategic land banking for forestry conversion while protecting genuinely retired agricultural land, consistent with the Government's own evidence showing that longer timeframes deliver superior policy outcomes.

Crown Land Afforestation and Wilding Species Risk (Section 6 - Definition of "Crown afforestation land" and clause (c)(vi) of "restricted forest land" definition)

Provision: Section 6 defines "Crown afforestation land" as "Crown-owned land that is made available for afforestation, other than land that is used by Landcorp Farming Limited for farming purposes or land administered under the Crown Pastoral Land Act 1998." Under the definition of "restricted forest land" in Section 6, clause (c)(vi) specifically exempts "Crown afforestation land" from the Bill's restrictions.

Council's Concern: The Bill lacks adequate provisions to prevent the use of high wilding potential species on Crown Land within the ETS. Crown afforestation land is completely exempted from the Bill's restrictions, and there are no specific provisions in the Bill addressing wilding species risk on any land type.

Southland faces one of New Zealand's most severe wilding tree threats, with over 100,000 hectares of high-country pastoral and tussock grassland at immediate risk. Nationally, wilding conifers affect over 2 million hectares, spreading at 90,000 hectares annually, with potential economic costs between $1.9-3.8

billion at current levels. In neighbouring Otago, estimated losses reach $2.1 billion over 50 years, requiring expenditure of $18-38 million over the next decade just to maintain control.

Southland region exemplifies the critical need for regulatory control over species selection. Where high wilding potential species have been utilized in Southland, such as Douglas Fir, the lack of historic local regulatory control has resulted in wilding pine issues that could have been prevented through appropriate planning controls. In the Mid Dome area of Southland, wilding pines have caused water yield reductions ranging from 30% to 81%, among other issues.

Prevention is significantly more cost-effective than mitigation. Evidence from successful regional programs demonstrates wilding pine mitigation through resource consent processes and coordinated control programs provides cost-effective defense against landscape-scale invasions, delivering cost-benefit ratios of 20:1 to 34:1. However, Southland District Council continues to receive afforestation notices proposing high wilding potential species, increasing the amount of mitigation activities required to contain this issue.

The Government's Regulatory Impact Statement on the Bill contains no analysis of wilding pine risks associated with the proposed ETS restrictions. While the RIS acknowledges that "environmental considerations and impacts associated with exotic forests" were considered, this objective was discarded because "the proposal is limited in the extent that it can manage these effects" and "other workstreams are investigating this objective." This approach overlooks the direct relationship between ETS incentives and species selection decisions. The absence of wilding pine risk assessment in the policy framework that will guide future afforestation investments represents a significant analytical gap that could undermine both environmental and economic outcomes in regions like Southland where wilding pine threats are acute.

A single mismanaged planting of Douglas Fir to monetize a subsection of Crown conservation areas could generate millions of dollars in environmental damage and control costs across the wider landscape, with ongoing funding requirements that would divert resources from other essential council services. This could create a long-term, unending wilding pine issue for our region.

Recommendation: The Bill should either prohibit all high wilding potential species from registration in the ETS system, or specifically prohibit all wilding species from registration on Crown Land.

Mixed-Species Forest Classification (Section 6 - Definition of "restricted forest land" clause (b))

Provision: Section 6 defines "restricted forest land" as including land where "the forest species on the land are predominantly exotic forest species" (clause (b)). This means the restrictions apply based on the predominant species classification rather than the total area or proportion of exotic species.

Council's Concern: While the term "predominantly" already exists in the Climate Change Response Act 2002 for classifying Pre-1990 forest land (defined as forest that "was predominantly exotic species on 31 December 2007"), this represents the first time the term is being used to restrict new afforestation activities. The existing use determines historical classification based on what was established decades ago, whereas the amendment applies it to prospective planting decisions.

It is unclear whether existing EPA guidance for determining "predominantly exotic" status for Pre-1990 forests applies to this new context of restricting afforestation. The Bill does not specify whether EPA's existing interpretation methods and thresholds for historical forest classification will govern new planting restrictions, or whether different criteria will apply.

This uncertainty creates potential for circumvention where foresters could plant up to 49.9% of an area with exotic species (such as radiata pine) and 50.1% with indigenous forestry, thereby avoiding the "predominantly exotic" classification and bypassing the 25% restriction entirely. This would enable larger portions of farms to be converted beyond the intended 25% allowance while technically complying with the Bill's provisions.

These definitional gaps create the risk of strategic planting designed to avoid restrictions through careful species composition, potentially undermining the Bill's policy objectives while creating uncertainty for both forestry operators and regulatory enforcement.

Recommendation: Amend Section 6 clause (b) to define restrictions based on a clear threshold of exotic forest species area or trees (e.g., "contains more than 25% exotic forest species by area") rather than relying on the "predominantly" test. Alternatively, explicitly reference how existing EPA guidance for "predominantly exotic" determinations will apply to new afforestation restrictions. This would provide regulatory certainty, prevent circumvention, and ensure the 25% limitation applies to the actual area of exotic forestry regardless of other species present.

Transitional Exemptions Creating Additional Loopholes (Schedule 1AA, Part 5, Sections 47-48)

Provision: The Bill includes extensive transitional exemptions in Part 5 of Schedule 1AA. Section 48 allows the EPA to determine that LUC class 1-6 land is not "restricted forest land" if applicants can provide evidence of "qualifying forestry investment" made between 1 January 2021 and 4 December 2024. Section 46 defines "qualifying forestry investment" extremely broadly, including conditional sale agreements, resource consent applications, seedling orders, land preparation, government grants, and even "a third party has been contracted to undertake due diligence for the purposes of afforesting land or purchasing land with the intent to afforest it."

Council's Concern: These transitional provisions create a significant additional pathway for circumventing the Bill's restrictions. The broad definition of "qualifying forestry investment" means that any forestry investor who undertook even preliminary steps (such as due diligence or conditional agreements) during the three-year period leading up to the policy announcement can claim exemption from all restrictions. This undermines the Bill's effectiveness and could result in substantial additional conversions beyond those contemplated by the 25% allowance and annual LUC 6 limits.

Recommendation: Narrow the definition of "qualifying forestry investment" to require substantial, irreversible commitments such as unconditional land purchases and completed resource consents, rather than preliminary due diligence activities.

Cross-Regulatory Impact and Effects

A critical concern for Southland District Council is that this Bill represents one of three major forestry policy changes proceeding simultaneously without coordinated assessment. The Climate Change Response (Emissions Trading Scheme—Forestry Conversion) Amendment Bill, the Climate Change (Forestry) Amendments to the NZ ETS, and proposed changes to the National Environmental Standards for Commercial Forestry (NESCF) create a new regulatory framework that reshapes land use economics while leaving critical policy interactions unexamined.

No comprehensive coordinated regulatory impact assessment was conducted examining the combined effects of all three changes. The most significant unassessed interaction involves the relationship between carbon pricing incentives and the removal of the ability for local authorities to set rules more stringent than the NESCF. Government analysis acknowledged in the interim regulatory impact statement for the NES-CF that "depending on the price of carbon, this is likely to be worth at least several hundred million dollars to the forestry sector" yet provides no analysis of how these regulatory changes will interact with such powerful economic incentives.

The consultation across multiple forestry legislation proposals has been widely inconsistent. The Climate Change Amendments to the NZ ETS proposal had 28 working days for engagement, the NES-CF proposals had 41 working days, while the Climate Change Response Amendment Bill currently has had

roughly 7 days for consultation on the bill. This fragmented approach prevents submitters from examining the combined effects of all changes to make informed submissions.

The interim regulatory impact statement for the NES-CF acknowledges that "policy development has been progressed under tight timeframes. As a result, we have been unable to engage widely and the evidence to assess the [NES-CF] proposals is therefore limited." This represents a concerning departure from evidence-based policy development principles, particularly for changes that will have permanent impacts on land use patterns.

Regional impacts vary significantly based on land classification distributions and previous afforestation patterns. The Southland District has historically seen lower levels of afforestation compared to other regions, and the proposed changes to forest registration in Land Use Classification (LUC) 1-6, combined with potential changes to carbon sequestration rates for smaller registrations, could dramatically alter the economics and shift afforestation pressure toward our region.

Cumulative Effects on Southland

The combination of these provisions will continue to enable large-scale afforestation in Southland despite the Bill's stated intent, creating severe economic and social consequences for rural communities already under pressure from previous farm conversions who cannot withstand continued loss of agricultural land to forestry. This regulatory fragmentation means that while the Bill attempts to limit farm conversions through the 25% allowance and LUC 6 restrictions, the broader policy environment may create new economic incentives that undermine these protections or shift pressure to areas not adequately considered in the Bill's development, leading the Council to support the Government's objective to protect productive farmland while submitting that the current Bill provisions are insufficient to achieve this goal when considered alongside the broader regulatory changes affecting forestry investment decisions.

Conclusion

Southland District Council urges the Environment Committee to strengthen the Bill's provisions to genuinely protect productive farmland from conversion to exotic forestry. The recommendations outlined above would close significant loopholes in the current draft and better achieve the Bill's stated objectives.

Of particular concern is the lack of coordinated assessment across the three major forestry policy changes proceeding simultaneously. Government documents acknowledge that "policy development has been progressed under tight timeframes" with "limited evidence" and inadequate analysis. The Committee should require comprehensive analysis of how this Bill will interact with the Climate Change (Forestry) Amendments to the NZ ETS and proposed changes to the National Environmental Standards for Commercial Forestry before proceeding. The current fragmented approach risks creating unintended consequences and policy interactions that could undermine the Bill's objectives or shift problematic impacts to regions like Southland that have not been adequately considered in the analysis.

The Council remains committed to supporting sustainable land use that balances environmental objectives with the economic and social wellbeing of rural communities. We respectfully request that the Committee consider these submissions and recommendations to ensure the Bill effectively protects Southland's agricultural sector and rural communities while addressing the broader regulatory coordination challenges affecting forestry policy.

Question 2: How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?

Southland District Council acknowledges the importance of spatial planning in promoting housing and urban outcomes. However, Council has concerns regarding the ambiguity in the Going for Housing Growth document as it relates to rural communities with small urban areas.

Council is concerned that the proposed framework may result in increased reporting and data requirements that are not commensurate with the scale and needs of small urban areas within our district. Specifically, requirements such as regulatory justification reports may create disproportionate barriers for small councils seeking to tailor standardised zones to work effectively for small urban communities.

Where the cost or time required to develop these reports outweighs the potential benefits for a community, this creates a difficult decision-making framework for local authorities such as Southland District Council. This challenge is compounded by rate caps and other financial constraints that may be placed on councils, creating pressure to implement changes only when desperately needed, potentially limiting beneficial changes for communities.

These concerns extend to Future Development Strategy (FDS) elements that may be incorporated into spatial plans. The consultation documents do not clearly indicate the expected content requirements for spatial plans prepared by small councils, and it appears that the same standards may apply regardless of urban area size. If councils or regional councils are required to implement spatial plans incorporating all FDS elements, this may require Southland District Council to spend disproportionately more per capita on planning documents compared to larger regions.

Recommendation: Council recommends that smaller councils be provided with flexible spatial planning requirements that allow for the creation of plans appropriate to small urban areas, designed and scaled commensurately with their populations. This approach would enable Southland District Council to create feasible, maintainable plans that provide growth opportunities for our communities on an as-needed basis.

Question 5: Do you agree with the proposed methodology for how housing growth targets are calculated and applied across councils?

Southland District Council does not fully agree with the proposed methodology for calculating housing growth targets, particularly as it applies to rural councils with small urban areas.

While Council acknowledges that high growth scenarios with a 20% contingency margin may be appropriate for larger urban centres, this approach may not adequately reflect the complete outlook for the Southland region. Current growth projections indicate that Southland would experience low growth rates compared to other regions. However, several emerging economic developments could drive higher growth rates, including increased interest in renewable energy (wind farms), aquaculture, data centres, and tourism development.

The proposed methodology using current high Stats NZ projections with a 20% contingency margin may result in under-provision for housing in specific areas where 'spiky' increases in development could occur. Council is particularly concerned about potential migratory shifts within our communities, such as movement from rural areas (due to fluctuations in dairy product pricing and commercial forestry uptake) towards urban areas where centralised activities like aquaculture may be concentrated.

Additionally, external factors such as continued development south of Queenstown may influence our housing market dynamics in ways not captured by current projections.

Question 6: Are there other methods that might be more appropriate for determining housing growth targets?

Southland District Council recommends that the Government allow for a more flexible approach for small, rural councils that incorporates detailed local analysis to meet community needs.

Council suggests that growth scenarios should enable a more robust, flexible process to understand market pressures that drive housing demand increases. This approach should include recognition of emerging economic activities and their potential population impacts, as well as consideration of regional economic interdependencies and migratory patterns. The methodology should also provide flexibility to account for industry-specific developments that may not be reflected in standard demographic projections.

Furthermore, the system should allow for more detailed local analysis that considers the unique circumstances of rural and small urban communities. This flexible approach would better position Southland District Council to provide appropriately zoned land with suitable zoning frameworks to accommodate migratory shifts or housing increases resulting from specific economic activity uptake.

Such a methodology would ensure that housing growth targets are realistic and responsive to local conditions, rather than being constrained by standardised projections that may not capture the full spectrum of economic and demographic changes affecting rural regions like Southland.

Southland District Council is currently preparing a community based spatial plan that considers a locally focused housing and business assessment, constraint mapping and community aspirations. This is approach has been chosen as fit for Southland's particular characteristics.

Question 15: Do you agree that councils should be required to provide enough development capacity for business land to meet 30 years of demand?

Southland District Council supports the proposal for councils to provide enough business land to meet 30 years of demand. Council has experienced issues with our current allocation of industrial and commercial land, with constituents and business owners expressing demand for additional land for their activities. Some existing and commercial zoned areas are at risk of natural hazard and will be driven to relocate over the medium term, a lack of suitable zoning may lead to some of these activities leaving the district.

However, Council has concerns about the practical implementation of this requirement in small townships. Depending on the standardised zones proposed in the new system, this requirement may lead to outcomes where residential areas in our townships are potentially rezoned, or substantial areas of these townships are rezoned, to mixed-use zones to accommodate the required business capacity. This approach may be necessary where townships are too small to fully separate residential and business activities.

Such mixed-use arrangements may create externality issues where commercial properties are developed in close proximity to residential properties, resulting in amenity concerns such as increased noise, light pollution, and other impacts on residential amenity. Council seeks clarity on how these potential externality issues will be managed within the new system's framework.

As a rural council, Southland District Council has also considered the spatial distribution of business land under the new planning system. Our commercial and industrial needs are spread throughout the district to support activities occurring in the rural areas. These business areas may need to be located closer to rural activities to fully enable the development of rural-supporting commercial or industrial activities, such as sawmills or contracting yards for dairy farms.

If there is a requirement to locate business land exclusively within urban areas, this may prevent us from positioning these zoned areas where they are most needed to support rural economic activities. Council recommends that small councils be permitted to locate business land outside of urban areas where

necessary to support the economic activities occurring throughout the district as they continue to grow. This also supports the continued resilience of smaller communities in the district.

Question 18: Do you agree with the proposal that the new resource management system is clear that councils are not able to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment? If not, how should the system best give effect to Cabinet direction to not have rural-urban boundary lines in plans?

Southland District Council does not support the proposal to remove rural-urban boundary rules for our district. In many areas surrounding our townships, there are areas of Land Use Capability (LUC) Class 1 and 2 land that require protection to retain primary production capacity. These areas support a diverse set of rural activities that are beneficial to the economic outlook for our region.

Additionally, if councils are required to provide sufficient housing capacity within their urban areas with future infrastructure provision to enable those developments, then disconnected development outside of spatially planned areas may create adverse effects for our infrastructure networks. Currently, properties located far from our infrastructure network are not required to connect to reticulated systems. Low density properties on large lots at the edge of urban areas may create a buffer area enabling developments not connected to these systems, which would place substantial financial costs on infrastructure providers in the future to connect those properties or subsequent development to the network.

Council recommends that the system provide flexibility for rural councils to maintain appropriate boundaries where necessary to protect high-quality productive land and manage infrastructure efficiency, rather than implementing a blanket prohibition on such provisions.

Question 19: Do you agree that the future resource management system should prohibit any provisions in spatial or regulatory plans that would prevent leapfrogging? If not, why not?

Southland District Council does not agree that the future resource management system should prohibit provisions preventing leapfrogging development. Preventing leapfrogging is important for protecting valuable productive land and managing infrastructure costs effectively in rural districts.

As outlined in our response to Question 18, scattered development patterns create significant challenges for infrastructure provision and ongoing servicing costs for a district with a numerically small rate base. Leapfrogging development would exacerbate these issues by creating pressure for infrastructure extension to isolated developments, potentially compromising the financial sustainability of our infrastructure networks and creating inequitable cost distributions among ratepayers.

Question 28: Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system?

Southland District Council considers that offsetting for intensification may not apply as intended by the proposed changes in our district context. Many of our townships are surrounded by Section 6 limitations such as natural hazards, Natural Character areas, and Outstanding Natural Features and Landscapes. Council is required to plan the majority of our townships around these Section 6 considerations to ensure there is sufficient capacity while managing these major constraints.

Given the prevalence of these mandatory Section 6 constraints in our district, the offsetting mechanism may have limited practical application. The constraints that typically require offsetting in larger urban areas are less relevant to our district context, where physical and environmental limitations rather than planning preferences drive development patterns.

Council currently implements some viewshaft protection around Te Anau through Visual Amenity Landscapes; however, Central Government has indicated that Visual Amenity Landscapes may be removed as part of the RMA reform. Council does not anticipate that non-Section 6 requirements will be a major concern for our district under the new system.

Question 29: If offsetting is required, how should an equivalent area be determined?

Should offsetting be required in the new resource management system, Southland District Council emphasises that the methodology for determining equivalent areas must account for the unique constraints faced by rural districts. Given that our townships are predominantly constrained by Section 6 matters rather than discretionary planning decisions, the application of standard offsetting methodologies may not be appropriate or practical.

The proposed approach of redistributing capacity based on equivalent land values may not be suitable for small townships where land values are relatively uniform and development opportunities are limited by environmental constraints rather than market factors. Council recommends that any offsetting methodology provide flexibility for rural councils to demonstrate equivalent provision of capacity within the practical constraints of their local environment, rather than applying standardised approaches designed for larger urban areas with different constraint patterns.

Question 31: What controls need to be put in place to allow residential, commercial and community activities to take place in proximity to each other without significant negative externalities?

Southland District Council recognises that mixed-use zoning may be necessary in our small urban areas to provide sufficient business land capacity, as discussed in relation to Question 15. However, Council has identified several externalities that require careful management to enable successful coexistence of residential, commercial, and community activities.

The primary externality of concern relates to on-street parking and carriageway width requirements. Our district does not have good access to alternative methods of transport outside of private vehicles, creating a need for adequate parking at commercial activities to accommodate car usage. If councils are not able to enforce on-site parking requirements, we may need to increase carriageway width to enable more on-street parking in urban areas. This approach may increase costs for residential activities in mixed-use zones, as they would contribute more through infrastructure levies or be required to privately develop larger roads to service their development. Such increased costs may act as a depressant for housing development in our region, as the relative costs for development may increase for elements such as roading infrastructure. Similar considerations apply to reticulated systems for stormwater and wastewater, where mixed-use development may create additional infrastructure demands.

Beyond infrastructure provisions, Council is concerned about operational externalities from commercial or industrial and rural industry activities that may impact residential amenity. These include increased noise levels, extended hours of operation, increased light pollution, proximity to boundaries, height of structures, and pollutants such as dust, steam, and debris. Controls need to be established to manage these externalities while still enabling the flexibility required for mixed-use development in small urban areas.

Council recommends that the new system provide clear guidance on managing these externalities while recognising the unique constraints and requirements of small rural townships.

Question 32: What areas should be required to use zones that enable a wide mix of uses?

Southland District Council considers that our smaller urban areas may be appropriate locations for zones that enable a wide mix of uses. As previously commented, the Southland District may be particularly suited to mixed-use zones given the scale and characteristics of our townships.

For our smaller urban areas, it may be appropriate to enable a broad range of uses to fully enable development opportunities. As an example, mixed development where commercial activities are paired with on-site residential activities may encourage more commercial development in these areas, creating synergies that support both residential and business growth in small township environments.

Given the unique characteristics of rural districts with small urban areas, Council recommends that areas similar to our townships be identified as appropriate for wide mix-use zoning to enable efficient land use and support local economic development. For additional comments on mixed-use zoning considerations, please refer to our responses to Questions 15 and 31.

The inclusion of a 'township' zone written for smaller community centres would be more beneficial for rural districts than a 'mixed use' zone normally associated with large urban settlements.

National Environmental Standards for Granny Flats (Minor Residential Units)

Question 57: Are the proposed provisions in the NES-GF the best way to make it easier to build granny flats (minor residential units) in the resource management system?

Southland District Council agrees that a National Environmental Standard is likely the most effective tool to achieve immediate increases in granny flat development within the Southland District. However, Council notes that conflicts exist within our current District Plan that will require substantial community education and potentially a plan change or non-Schedule 1 amendment to address implementation issues.

Council recommends consideration be given to delaying implementation of these changes until the full Phase 3 RMA reforms are implemented. This would reduce implementation friction for local authorities during the transitional period to the new RMA framework.

Question 58: Do you support the proposed permitted activity standards for minor residential units?

Council generally supports the proposed permitted activity standards. However, Council has concerns regarding potential conflicts with existing District Plan provisions and the practical implications for infrastructure and service delivery in our district.

R2 of the NES will limit Council's ability to enforce outdoor space requirements for MRUs. This creates particular concern where future modifications to the principal residential unit may trigger resource consent requirements. Such restrictions will likely confuse and frustrate landowners who expect RMA changes to increase permissive activities, creating significant implementation issues for local authorities. Given that central government has signaled general restrictions on outdoor living space requirements as part of Phase 3 RMA reform, implementing these restrictions now creates medium-term implementation friction that could be avoided by addressing outdoor living space rules comprehensively in the broader reform process.

Council is specifically concerned that these MRUs will be used for short-term visitor accommodation rather than residential housing, which could undermine the intent of the policy to provide additional residential capacity throughout the country. Our current District Plan is quite lenient for Short Term Visitor Accommodation, where the 'activity' of visitor accommodation has few controls throughout our District, creating some deficiencies in how we handle this activity. In areas like Oban, Riverton, and Te Anau this creates an acute issue. These areas often have seasonal tourism marketing some of New Zealand's best natural assets, which promotes a market for short-term visitor accommodation. Some of these homes see little use in the off seasons, creating housing pressures for local residents.

While the consultation document outlines that councils will retain control over the "specific use of the minor residential unit (other than for residential activities)", the Government's announcement that plan changes will not be permitted during the transition phase of RMA reform leaves Council with limited options for managing the use of these structures. If we are not allowed to make plan changes we are unsure if the NES-GF will ease any housing pressures, and may potentially just exacerbate the current housing issues our District faces. This restriction will ultimately undermine our ability to ensure these structures remain dedicated to residential activity rather than commercial visitor accommodation.

The proposed standards appear workable within our current planning framework, though implementation will require careful consideration of existing plan provisions and their interaction with the new national standards.

Question 59: Do you support district plans being able to have more lenient standards for minor residential units?

Council supports this provision in principle. However, Southland District Council does not currently have more lenient rules compared to the proposed NES-GF, so this provision will have limited effect in our district.

Given the Government's announcement during the consultation period of implementing a moratorium on plan changes in the very near future, the rule structure implemented by the NES-GF will have permanence in the medium term. Whatever rule structure is established by the NES-GF will effectively be the final framework for this issue until Phase 3 of the RMA is implemented, as councils will be unable to make plan changes to modify or improve these provisions. This reinforces the importance of ensuring the NES-GF provisions are carefully designed and appropriately flexible to address local circumstances.

Question 60: Should the proposed NES-GF align, where appropriate, with the complementary building consent exemption proposal?

Yes, Council recommends maximum alignment between the NES-GF and Building Act changes to reduce implementation complexity and potential confusion for applicants and Council staff.

Question 61: Do you support the proposed list of matters that local authorities may not regulate in relation to minor residential units? Should any additional matters be included?

Council does not support the proposed restrictions in R2 of the NES, particularly the prohibition on regulating parking, access, and outdoor space requirements.

The restriction on outdoor space requirements may create implementation issues, particularly if future modifications to the principal residential unit trigger resource consent requirements. This could confuse and frustrate landowners and create inconsistent regulatory approaches.

The prohibition on access and parking regulation presents significant challenges for Southland District. Increased vehicle access and on-street parking from MRU development may create enforcement difficulties for access and parking management, require reassessment of roading infrastructure and maintenance requirements, necessitate review of our Engineering Code of Practice, and create emergency service access issues on smaller access roads. Historically Council has maintained low access requirements as parking could be provided on-site and vehicle numbers were low. However, issues of site access on small access roads for emergency services vehicles and other large vehicles have been problematic.

Council recommends retaining the ability to regulate parking and access requirements to avoid these implementation issues in our district.

Question 62: Do you support existing district plan rules applying when one or more of the proposed permitted activity standards are not met?

Yes, Council supports this approach as it will provide the most straightforward implementation pathway for Southland District Council. While this may create some conflict with our existing Restricted Discretionary Rules, this approach will be easier to implement during the transitional period compared to developing additional non-compliance rules that would require extensive community education.

However, Council notes that our District Plan would restrict MRUs to Discretionary activities if there were more than one breach of the NES-GF standards or where other District Plan rules apply. This may not achieve the outcome that Central Government intends from this national direction. If the goal is to generally enable more MRUs, then the current Southland District Plan provisions may represent a barrier to achieving that objective. It could be sensible to provide a discrete set of controls for this activity that better aligns with Central Government's goals.

Question 63: Do you support the list of matters that are out of scope of the proposed NES-GF? Should any additional matters be included?

Council does not support excluding any additional matters from local authority control at this time.

Council reiterates its opposition to the parking and access exclusions proposed in the current NES-GF. As outlined in our response to Question 61, the prohibition on regulating these matters presents significant challenges for infrastructure management, emergency service access, and roading maintenance in our district. Council strongly recommends retaining local authority ability to regulate parking and access requirements.

NESMA and NZCPS Submissions

Question 3: What are the benefits, costs or risks of the proposed changes?

The benefits of the proposed changes are significant for Southland as the region seeks to develop a sustainable aquaculture sector. In short, it supports the derisking of aquaculture from a commercial point of view thus attracting investment.

It is important that creating an enabling regulatory setting for aquaculture does not come at the expense of the wild commercial fisheries and tourism industries of Southland or the cultural or undermine recreational values provided by Southland's coastal marine area.

Question 4: Do you support the proposed amendments to streamline specific applications to change consent conditions by making them controlled activities?

Southland District Council supports the proposed changes which will streamline specific applications.

Southland District Council supports the proposed amendments to the National Environmental Standards for Marine Aquaculture (NES-MA), which promote innovation, operational efficiency, and responsible development within the aquaculture sector. These objectives align closely with the vision outlined in the Murihiku Southland Aquaculture Pathway (Great South, July 2025).

The Pathway highlights strong community support for a sustainable aquaculture industry—provided it is well-managed, environmentally responsible, and delivers tangible benefits to local people and the regional economy. The proposed changes to streamline certain consent condition modifications will help enable this vision by reducing unnecessary regulatory barriers while maintaining environmental safeguards.

By facilitating adaptive, low-impact improvements to marine farming operations, these amendments represent a practical step toward achieving a thriving, future-focused aquaculture industry in Southland.

Question 7: Do you support the proposed changes to better enable research and trial activities on existing farms and in new spaces, including making some activities permitted?

Southland District Council support the desire to enable better research and trial activities. However, this should not be at the expense of current activity and industries including wild catch. There needs to be careful consideration and planning to ensure the right activity occurs in the right place and also alongside Aquaculture Settlement Areas (ASAs).

Southland District Council support making spat catching a controlled activity where spat is only used on farm where it originates form as this would help address the supply issues and minimise biosecurity risks.

Facilitating research and trials allows marine farmers, scientists, and technology developers to test new species, farming techniques, and environmental management practices in a controlled and responsive manner. This is particularly important for regions like Murihiku Southland, where there is strong community interest in developing a locally beneficial and environmentally responsible aquaculture industry.

By reducing regulatory barriers to low-risk, temporary research activities, the proposed amendments will help accelerate the adoption of best practices, support biosecurity improvements, and enable the sector to respond to emerging challenges such as climate change and supply chain disruptions. These changes also align with the goals outlined in the Murihiku Southland Aquaculture Pathway (Great South, July 2025), which emphasises the importance of innovation and evidence-based development in building a resilient and inclusive aquaculture future.

Question 22: Would the proposed changes achieve the objective of enabling more priority activities and be simple enough to implement before wider resource management reform takes place?

Yes.

Southland District Council supports policy rebalancing that appropriately shifts weight to enable critical infrastructure and priority activities within the Coastal Marine Area. Historically, some necessary activities in the Coastal Marine Area have been declined due to the protective policies of the New Zealand Coastal Policy Statement, so these changes may provide sufficient policy direction for priority projects to proceed with new consents.

We concur with Taituarā's position that enabling policies should apply specifically to priority activities and should not enable non-priority activities in the Coastal Marine Area. This targeted approach would ensure that policy rebalancing achieves its intended outcomes without compromising the protective framework for areas where such activities are not essential.

Southland District Council supports the proposed amendments to Policy 6 to strengthen the language around enabling priority activities. These changes will provide clearer guidance to decision-makers and help ensure that nationally and regionally significant activities, such as aquaculture, are appropriately recognised and supported in coastal planning and consenting processes.

Southland District Council supports the proposed expansion of the "functional need" test to include "operational need." Recognising operational need will provide a more realistic and enabling framework for assessing proposals, without compromising environmental safeguards.

Southland District Council generally supports the proposed amendment to Policy 8 to direct decision-makers to provide for aquaculture activities within aquaculture settlement areas. However, the development process of ASAs does not appear to include an AEE of aquaculture activities in these locations of which some are particularly sensitive.

This change will help give effect to the Māori Commercial Aquaculture Claims Settlement Act 2004 and support iwi and hapū to realise the full potential of their settlement assets. It also aligns with the objectives of the New Zealand Aquaculture Development Plan 2025–2030, which seeks to grow a sustainable and inclusive aquaculture sector.

Southland District Council supports in principle the proposed amendment to Policy 8(b) to include recognition of the cultural and environmental benefits of aquaculture, alongside social and economic benefits.

This broader framing reflects the values of many Southlanders and aligns with the Murihiku Southland Aquaculture Pathway (Great South, July 2025), which highlights the importance of aquaculture that delivers holistic benefits to people, place, and planet. Southland District Council is aware of differences in wording between different legislation and other regulatory instruments under the RMA e.g. 'ecological' may be more appropriate.

Question 23:

Unsure.

Southland District Council is supportive of appropriate economic activities that occur in the Coastal Marine Area, such as aquaculture. However, we are not directly involved in the consenting or decision-making processes for these activities and therefore cannot comment definitively on the efficacy of the proposed changes.

If these policy changes enable increased sustainable economic activity in the Coastal Marine Area, particularly aquaculture development that aligns with regional economic objectives, Southland District Council would be supportive of such outcomes.

National Policy Statement for Highly Productive Land.

Question 25. Should LUC 3 land be exempt from NPS-HPL restrictions on urban development (leaving LUC 3 land still protected from rural lifestyle development) or, should the restrictions be removed for both urban development and rural lifestyle development?

Recommendation: Remove restrictions for both urban development and rural lifestyle development on LUC 3 land.

Southland District Council mostly supports the complete removal of restrictions for LUC 3 land from the NPS-HPL for both urban development and rural lifestyle development. This position recognises the practical realities of land use in the Southland District and the balanced approach needed to support both productive capacity and community housing needs.

In the Southland context, lifestyle blocks typically occur around existing residential areas where LUC 2 land is present. The proposed changes to remove LUC 3 restrictions would not affect these established lifestyle development patterns, as LUC 2 land would remain protected under the amended NPS-HPL.

Rural lifestyle development can maintain productive capacity, as many rural lifestyle properties retain sufficient land area to support pastoral activities. The subdivision patterns commonly observed in Southland demonstrate this principle in practice, where applicants typically subdivide small portions of their farms while maintaining large areas for continued productive use. This approach preserves the overall productive capacity of the land while providing necessary housing opportunities.

Currently, Southlanders are utilising boundary adjustments to circumvent HPL restrictions for farm succession and farm sales. The removal of LUC 3 restrictions should facilitate easier and more straightforward farm transfers, sales, and succession planning. This change would reduce the administrative burden on both landowners and Council while enabling more efficient and transparent processes for legitimate farming business activities.

The Southland District experiences relatively modest demand for rural housing compared to other regions. Removing LUC 3 restrictions would enable incremental increases in rural housing supply that align appropriately with local demand patterns. This measured approach would support community needs without compromising the district's agricultural foundation.

Question 26. If the proposal was to exempt LUC 3 land from NPS-HPL restrictions for urban development only, would it be better for this to be for local authority led urban rezoning only, or should restrictions also be removed for private plan changes to rezone LUC 3 land for urban development?

Recommendation: Remove restrictions for both Council-led plan changes and private plan changes.

Council recommends that restrictions be removed for both Council-led plan changes and private plan changes. Southland District Council operates with limited resources and must make strategic decisions regarding planning work priorities. The current gateway tests in the NPS-HPL create substantial barriers for activities that historically operated within the General Rural Zone, including commercial, industrial, and non-primary production activities.

Private Plan Change 3, currently being processed by Council, illustrates these challenges. This plan change seeks to rezone an established meat processing facility that supports primary production activities in the district, yet must navigate the complex gateway tests despite being a pre-existing operation. Removing restrictions for private plan changes would provide an additional pathway for constituents to pursue appropriate rural land development, reducing the administrative burden on Council while maintaining appropriate oversight through the standard plan change process.

Question 27. If LUC 3 land were to be removed from the criteria for mapping HPL, what, other consequential amendments will be needed? For example, would it be necessary to:

Recommendations:

1. Maintain requirement for large and geographically cohesive areas
2. Include LUC 3 land only where it contributes to cohesive HPL areas
3. Allow site-specific assessments with clear implementation guidance
4. Retain regional council discretion to map additional land

Large and Geographically Cohesive Areas (Clause 3.4(5)): Council maintains that requiring cohesive, distinct areas for highly productive land identification creates more implementable regulations. Clear, contiguous boundaries reduce conflicts over equity, accuracy, and efficacy that arise when neighbouring properties face different restrictions. Fragmented or isolated areas of highly productive land create implementation challenges, particularly where small portions of allotments are affected, as demonstrated in Figures 1 and 2 of our supporting documentation.

Small and Discrete Areas of LUC 3 Land: LUC 3 land should remain included in HPL mapping only where it contributes to large, cohesive identification of highly productive land that creates sensible, contiguous areas for primary production protection. However, where LUC 3 land creates isolated "islands" of protection or represents areas too small for meaningful protection, it should be excluded from HPL designation.

Site-Specific Assessments: While Council acknowledges concerns from local professionals regarding inaccuracies in the Manaaki Whenua LUC information due to age and scale limitations, the implementation of site-specific assessments presents significant challenges. If site-specific assessments contradict existing regulatory documents, territorial authorities require clear guidance on acknowledging and integrating this information. Constant updating of LUC information based on site-specific assessments could create ongoing administrative burdens that impact document implementation.

Furthermore, if site-specific information remains attached only to individual consents rather than updating broader LUC identification, this could create issues for future consenting, land use decisions, and public knowledge. This approach may also create equity concerns where landowners with greater financial resources can achieve better outcomes through comprehensive soil assessments compared to those with limited funds.

Discretion for Additional Land Mapping: Council recommends retaining regional councils' ability to map other LUC classifications as highly productive land. This discretion enables large and cohesive identification of productive land, protects key primary production areas from inappropriate subdivision and development, and allows consultation with local stakeholders to determine optimal outcomes for highly productive land in their specific regional context.

Question 28. Given some areas important for foods and fibre production such as Pukekohe and Horowhenua may be compromised by the removal of LUC land, should additional criteria for mapping HPL be considered as part of these amendments?

Recommendation: Support additional criteria through Special Agricultural Areas, but ensure they are carefully targeted to critical areas only.

Southland District Council agrees that additional criteria for mapping HPL should be considered as part of these amendments. Given that some areas important for food and fibre production, such as Pukekohe and Horowhenua, may be compromised by the removal of LUC 3 land from protection, the Special Agricultural Areas mechanism provides an appropriate framework for addressing this concern.

However, any additional criteria must be carefully targeted to avoid reinstating the broad restrictions that the removal of LUC 3 land seeks to address. The focus should be on identifying truly critical and

irreplaceable food production areas rather than applying blanket protections that could recreate the implementation challenges currently experienced with the NPS-HPL.

Question 29. If so, what additional criteria could be used to ensure areas important for food and fibre production are still protected by NPS-HPL?

Recommendation: Limit Special Agricultural Areas to critical horticultural areas only, excluding pastoral activities.

Council supports the use of Special Agricultural Areas (SAAs) as additional criteria, but with important qualifications regarding their scope and application. SAAs should be strictly limited to critical horticultural areas and should not include areas primarily focused on pastoral activities.

The distinction between horticultural and pastoral land uses is crucial for the Southland context and other rural communities. Horticultural operations represent specialized, irreplaceable growing environments that justify heightened protection due to their specific soil, climate, and infrastructure requirements. These areas often cannot be relocated and represent unique combinations of natural and built resources.

Including pastoral areas within SAAs could inadvertently reinstate the same restrictions on farming communities that the removal of LUC 3 land aims to address. Pastoral farming, while valuable, generally operates with greater flexibility regarding location and can adapt to various land types. Applying SAA restrictions to pastoral areas would undermine the policy intent of providing greater development flexibility in rural areas and could recreate the implementation challenges that necessitated the current amendments.

Question 30. What is the appropriate process for identifying special agricultural areas? Should this process be led by local government or central government?

Recommendation: Central government should lead the SAA identification process in consultation with regional councils and stakeholders.

Council recommends that the process for identifying SAAs should be led by central government in consultation with regional councils and relevant stakeholders. This approach would ensure consistency in application and prevent regional variations that could create uncertainty for land users and developers.

Central government leadership would also ensure that SAA designation focuses on nationally significant food production areas rather than locally important but not critically unique pastoral lands. This approach aligns with the national significance of the policy instrument while allowing for appropriate regional input on local conditions and considerations.

The identification process should include clear criteria that distinguish between horticultural areas warranting protection and pastoral areas that should remain subject to the more flexible framework enabled by removing LUC 3 restrictions. Consultation should include primary sector representatives, territorial authorities, and regional councils to ensure practical implementation.

Question 31. What are the key considerations for the interaction of special agriculture areas with other national direction – for example, national direction for freshwater?

No Comment

Question 32. Should timeframes for local authorities to map highly productive land in regional policy statements be extended based on revised criteria? Alternatively, should the mapping of HPL under the RMA be suspended to provide time for a longer-term solution to managing highly productive land to be developed in the replacement resource management system?

Recommendation: Extend timeframes for mapping HPL in regional policy statements by 2-3 years rather than suspending mapping entirely.

Southland District Council Submission on Proposed Changes to NPS-HPL

Council supports extending timeframes for local authorities to map highly productive land in regional policy statements based on revised criteria. The proposed changes to remove LUC 3 land and potentially include SAAs represent substantial modifications to the original framework that justify additional time for proper implementation.

The current LUC mapping utilized in the NPS-HPL contains significant inaccuracies that create implementation challenges for local authorities and confusion within communities where the mapped LUC classifications do not reflect actual on-ground conditions. These inaccuracies stem from the age and broad scale of the original mapping, which was generally carried out in the 1970s using methods that may not accurately represent current soil conditions and land capability.

Updating LUC mapping as part of the extended implementation timeframe would correct these inaccuracies and resolve issues where community members find that regulatory restrictions do not align with the actual productive capacity of their land. Improving the accuracy of LUC mapping will significantly enhance the implementation of the NPS-HPL by providing local authorities with reliable, current information to make well-informed decisions about highly productive land protection and development applications.

An extension of timeframes is preferable to suspending mapping entirely, as this approach maintains momentum toward implementing the revised NPS-HPL while recognising the practical challenges councils face in adapting to the new criteria and addressing mapping inaccuracies. A reasonable implementation timeframe would be two to three years from gazettal of the amendments, allowing councils to properly assess the implications of the changes, engage with stakeholders, develop appropriate mapping methodologies, and correct existing LUC mapping inaccuracies.

This extended timeframe would also allow for the development of clear guidance on SAA identification and implementation, ensuring consistent application across regions while maintaining the policy objectives of protecting truly significant agricultural areas.

National Environmental Standard for Papākainga

Executive Summary

This submission responds to consultation on the proposed National Environmental Standards for Papakāinga (NES-P). While we support the Government's intent to enable papakāinga development nationally, we have identified three critical issues with the current proposals that require refinement to ensure effective and safe implementation in our District context:

Inequitable Zone Coverage - The current proposal creates unequal access to papakāinga development based on zone designation rather than ancestral connection to land. Māori Ancestral land located in our Natural Open Spaces Zone can only access the restricted discretionary consent pathway (RD6) rather than the permitted activity pathway (PA1), determining ease of development by zoning rather than cultural connection.

Critical Safety and Infrastructure Gaps - The proposed standards lack essential provisions for parking, firefighting water supply, and section 6 RMA value protection. Given the remote nature of Māori Ancestral Land in our District and the potential for up to 10 residential units per development, these omissions create significant risks to emergency service access, fire safety, and environmental protection.

Environmental Values Regulatory Uncertainty - PAS3 fails to explicitly address section 6 RMA matters, creating regulatory gaps about when resource consent is required for papakāinga development in areas with natural character values, Outstanding Natural Features and Landscapes, or significant indigenous vegetation.

We support enabling papakāinga development but emphasize the need for additional safeguards to ensure developments are safe, sustainable, and appropriately balance cultural housing needs with environmental protection and community safety requirements. The proposed modifications will ensure the NES-P achieves its enabling objectives while maintaining appropriate protections for both residents and the environment.

Key Recommendations:

1. **Zone Coverage Equity:** Expand PA1 to include papakāinga development as a permitted activity on all Māori Ancestral land regardless of underlying zone, or specifically include Natural Open Spaces zones within the zones where papakāinga is permitted under PA1.

2. **Mandatory Safety and Infrastructure Standards:** Add the following mandatory permitted activity standards:

- Minimum on-site parking requirements (e.g., 2 spaces per unit in rural zones) to ensure emergency vehicle access
- Provision of adequate on-site firefighting water supply (e.g., minimum 45,000L capacity) for developments beyond reach of reticulated supply
- Specific permitted activity standards that either preclude development in areas with Natural Character, Outstanding Natural Features and Landscapes, or significant indigenous vegetation, or provide clear thresholds for when such development can proceed as permitted activities

3. **Environmental Values Regulatory Clarity:** Clarify in PAS3 whether rules protecting Natural Character, Outstanding Natural Features and Landscapes, and indigenous vegetation apply to papakāinga developments. If they do apply, specify this explicitly. If papakāinga development in areas with these values requires resource consent, include appropriate matters of discretion in the relevant RDM provisions to ensure these values are properly considered.

Question 64: Do you support the proposal to permit papakāinga (subject to various conditions) on the types of land described above?

We generally support the proposal to permit papakāinga on Māori Ancestral land. However, in our District, Māori Ancestral land exists within our Natural Open Spaces Zone. According to PA1, papakāinga development is only permitted in "zones for rural purposes, zones for Māori purposes, and zones for residential purposes." This means Māori Ancestral land in our Natural Open Spaces Zone would fall under RD6 as a restricted discretionary activity rather than benefiting from the permitted activity pathway.

While RD6 does provide for papakāinga development outside the specified zones, this creates an inequitable situation where the zone designation determines the ease of papakāinga development rather than the ancestral connection to the land.

Recommendation: Expand PA1 to include papakāinga development as a permitted activity on all Māori Ancestral land regardless of the underlying zone, or specifically include Natural Open Spaces zones within the zones where papakāinga is permitted under PA1.

Question 66: What additional permitted activity standards for papakāinga should be included?

We support the proposed permitted activity standards but identify significant gaps that could create safety, environmental, and operational issues, particularly given the unique characteristics and locations of Māori Ancestral Land in our District.

The absence of parking requirements in the proposed NES-P creates potential safety hazards, particularly in rural zones where Māori Ancestral Land is commonly located. Without dedicated on-site parking requirements, multiple residential units (up to 10 under PA1) could result in numerous vehicles parking on what are often single-lane access roads designed to minimum width standards. This scenario presents serious risks as emergency services (fire, ambulance, police) may be unable to access properties during critical incidents. Fire trucks require adequate width and turning space, which could be compromised by roadside parking. The remote nature of many Māori Ancestral Land sites means emergency response times are already extended, making unimpeded access crucial.

Māori Ancestral Land in our District is frequently located in remote areas, far from urban fire services and reticulated water supplies. The proposed NES-P permits up to 10 residential units without requiring any firefighting water provision. This creates significant risk because fire services rely on adequate water supply for effective firefighting operations, and remote locations mean fire services cannot rely on urban water infrastructure. The time required to transport water to remote sites can result in total property loss, while multiple residential units increase both fire risk and potential consequences. Indigenous vegetation in these areas can contribute to rapid fire spread, compounding the risk.

The proposed NES-P lacks clarity on how activities will interact with section 6 RMA matters, creating regulatory uncertainty and potential environmental harm. Natural character areas may be adversely affected by development without appropriate controls, while Outstanding Natural Features and Landscapes could be compromised by inappropriate development. Indigenous vegetation clearance for papakāinga development could result in loss of significant ecological values. The cumulative effect of multiple permitted activities could significantly impact pristine environments, and without clear standards, it's unclear when resource consent would be triggered for development affecting these values.

Recommendation: Include the following additional permitted activity standards: minimum on-site parking spaces per residential unit (e.g., 2 spaces per unit in rural zones) to ensure emergency vehicle access; provision of adequate on-site firefighting water supply (e.g., minimum 45,000L capacity) for developments in areas beyond reach of reticulated supply; and specific permitted activity standards that either preclude development in areas with Natural Character, Outstanding Natural Features and

Landscapes, or significant indigenous vegetation, or provide clear thresholds for when such development can proceed as permitted activities.

Question 67: Which, if any, rules from the underlying zone should apply to papakāinga developments?

We support the approach in PAS3 that identifies specific underlying zone rules that continue to apply. However, PAS3 does not explicitly address section 6 RMA matters such as Natural Character, Outstanding Natural Features and Landscapes, or indigenous vegetation clearance rules. This creates uncertainty about whether papakāinga development could proceed as a permitted activity in areas with these values, or whether such development would require resource consent.

The matters of discretion in RDM1-RDM7 also do not adequately address how section 6 values should be considered in consent processes.

Recommendation: Clarify in PAS3 whether rules protecting natural character, Outstanding Natural Features and Landscapes, and indigenous vegetation apply to papakāinga developments. If they do apply, specify this explicitly. If papakāinga development in areas with these values requires resource consent, include appropriate matters of discretion in the relevant RDM provisions to ensure these values are properly considered.

Question 68. Should local authorities have restricted discretion over papakāinga on Treaty settlement land (ie, should local authorities only be able to make decisions based on the matters specified in the proposed rule)?

We believe the standards suggested, with the requested modifications, as part of the NES-P allow for sufficient purview for resource consent processors to determine if papakāinga activity is appropriate on Māori ancestral land, including treaty settlement areas.

In our District, some treaty settlement areas are located on Stewart Island, which has worked to achieve Dark Skies certification to enhance the tourism industry. Lighting provisions are crucial to ensure Stewart Island remains a dark sky sanctuary. Such specific lighting provisions make sense for treaty settlement land that occurs on Stewart Island.

Providing for appropriate mitigation of natural hazards and other key requirements makes sense for development regardless of its statutory status. Local government oversight will ensure adequate consultation and engagement with iwi to ensure development on treaty settlement land provides for the best social and economic outcomes.

Recommendation: We support maintaining restricted discretionary activity status for papakāinga on treaty settlement land, as this provides necessary flexibility to address site-specific environmental and cultural considerations while ensuring appropriate consultation occurs.

Southland District Council Submission on Proposed Changes to NES-CF

National Environmental Standards for Commercial Forestry

Executive Summary

Southland District Council strongly opposes the proposed amendments to the National Environmental Standards for Commercial Forestry (NES-CF). These changes represent a fundamental erosion of local control over land use decisions that will have profound and lasting impacts on our communities, environment, and economy. The government is proceeding with major regulatory changes while explicitly acknowledging in its own Interim Regulatory Impact Statement that "policy development has been progressed under tight timeframes" with "limited evidence" and inadequate analysis. No comprehensive coordinated assessment was conducted examining the combined effects of three simultaneous forestry policy changes: the NES-CF amendments, Climate Change Response Amendment Bill, and ETS forestry changes.

The proposed restrictions on local authority discretion under Regulation 6 and the removal of Regulation 10A requiring afforestation management plans as a permitted activity condition are particularly concerning, as they remove essential tools for managing the unique environmental and social challenges facing Southland. The removal of afforestation and replanting plan requirements will significantly compromise our ability to monitor and manage forestry activities effectively.

These amendments will exacerbate New Zealand's dangerous over-reliance on radiata pine monoculture, which currently comprises 90% of plantation forests,[1] precisely when diversification is critical for sector resilience. The changes occur amid mounting biosecurity threats, escalating wilding conifer spread, and unprecedented land use change pressure, with 261,733 hectares of sheep and beef land purchased for forestry conversion between 2017 and mid-2024.[2] Economic modelling shows carbon forestry generates 32% internal rates of return compared to 6.3% for production forestry, creating powerful financial incentives that require democratic oversight to ensure appropriate land use outcomes, community protection, and long-term sector sustainability.

The amendments effectively eliminate existing mechanisms for encouraging alternative forestry approaches, creating potential long-term liabilities for communities while missing critical opportunities to build sector resilience through diversification. Research demonstrates viable alternatives to radiata pine monoculture exist, yet these changes remove the primary tools councils have to guide appropriate forestry development, encourage best practices, and protect community interests. Southland District Council urges the government to reconsider these proposals and instead work collaboratively with local authorities to develop regulatory frameworks that balance national consistency with essential local flexibility, democratic accountability, and long-term forestry sector sustainability.

Recommendations:

1. **Retention of Regulation 6 provisions** in their current form to maintain essential local authority discretion in managing forestry impacts according to regional conditions, community needs, and sector resilience requirements.
2. **Retention of afforestation and replanting plan requirements** as essential tools for effective monitoring, compliance, environmental protection, and forestry sector improvement.
3. **Integration of forestry policy with broader environmental and economic objective**s including climate change adaptation, biodiversity protection, and rural community sustainability.
4. **Development of National Authority/Forum:** If Central Government is set on forestry standards developed at the national level the government should create an authority which can develop regional

[1] Parliamentary Commissioner for the Environment (PCE), 2025.
[2] Orme & Associates Limited, 2024, p. 4.

and sub-regional standards and approaches that then become mandatory requirements for permitted activities under the NES-CF. Development of these standards would be created collaboratively with key stakeholders such as forestry companies, central government agencies, regional and local governments.

5. **Recognition of regional variation** in forestry impacts and the need for locally responsive regulatory frameworks.
6. **Enhancement rather than restriction of local authority tools** to encourage forestry sector diversification, including specific provisions to incentivise alternative species, continuous cover forestry, and other resilience-building approaches.
7. **Postponement of proposals pending adequate evidence and coordination** until the government completes the acknowledged missing comprehensive cost-benefit analysis, coordinated regulatory impact assessment of all three forestry policy changes, and adequate consultation with affected communities.
8. **Genuine consultation** with local authorities before implementing changes that fundamentally alter the balance between national consistency and local control.
9. **Evidence-based policy development** that addresses demonstrated problems with current regulatory arrangements, including systematic barriers to forestry diversification and mounting biosecurity risks, rather than hypothetical concerns about council restrictions.
10. **Coordinated regulatory assessment** examining the combined effects of NES-CF amendments, Climate Change Response Amendment Bill, and ETS forestry changes to understand cumulative impacts on land use patterns and regional economies.
11. **Comprehensive assessment of long-term forest management obligations** including mechanisms to ensure ongoing maintenance funding and prevent community liabilities from abandoned forest estates.
12. **Long-term management bond requirements** for permanent carbon forestry to protect communities from potential liabilities if forestry companies dissolve or abandon forest estates, ensuring ongoing funding for pest control, fire prevention, and environmental protection.
13. **Biosecurity risk management provisions** specifically addressing pathogen threats (red needle cast, pine pitch canker) and wilding pine spread, including species diversification requirements in high-risk areas.
14. **Supply chain diversification requirements** addressing gaps from seedstock production to processing infrastructure, coordinated through local planning processes to build regional capacity for alternative species.

Introduction and Southland Context

Southland District hosts approximately 5% of New Zealand's commercial forestry. While this may appear modest in national terms, the scale and concentration of forestry activities within our district creates significant localised impacts. Commercial forestry operations frequently border environmentally sensitive areas including national parks, conservation land, and Outstanding Natural Features and Landscapes, creating complex management challenges that require local expertise and flexible regulatory responses.[3]

Southland District Council acknowledges the significant environmental and economic benefits that well-managed commercial forestry can provide to our region and New Zealand. Research demonstrates that forestry delivers substantially lower nutrient and sediment losses to water compared to pastoral farming, and provides important carbon sequestration services.[4] Forestry can contribute meaningfully to New

[3] Bowman, R., 2025.
[4] Bell et al, 2025, p. 3.

Zealand's climate change mitigation strategy, with carbon sequestration from new forest growth having the potential to significantly mitigate the country's present-day gross annual carbon dioxide emissions.[5]

The region exemplifies the critical need for species diversification and site-appropriate forestry management. Where alternative species have been utilized in Southland, such as Douglas fir, the lack of historic local regulatory control has resulted in wilding pine issues that could have been prevented through appropriate local planning controls.[6] This demonstrates the importance of retaining local discretion to match species selection with local environmental conditions and management capabilities.

Economic reporting for Southland highlights serious concerns about the economic disruption potential of large-scale forestry conversion, particularly the risk to local communities, GDP loss from reduced agricultural activity and potential long-term impacts on transport infrastructure.[7] Our communities have expressed overwhelming negative sentiment regarding forestry expansion, particularly concerns about full farm conversions and the erosion of rural settlements.

The shift toward permanent carbon forestry creates additional long-term challenges for our region. Forests require ongoing management and maintenance costs, particularly for pest and weed control. The risk of forestry company abandonment of permanent forests creates potential long-term liabilities for local communities, who may be left to manage degraded forest estates if carbon revenues decline or companies dissolve.

Response to Consultation Questions

Question 10: Does the proposed amendment to 6(1)(a) enable management of significant risks in your region?

No. The proposed amendment to Regulation 6(1)(a) is inadequate for managing the complex risks forestry presents in Southland and will significantly worsen existing systemic problems in New Zealand forestry. It only addresses one hazard that has a limited application across New Zealand. It does not enable effective consideration of other offsite risks that arise from forestry in other locations.

Recent modelling demonstrates the critical importance of maintaining regulatory tools to guide sustainable land use transitions. Research shows that under current carbon pricing settings, significant land use change will occur with the overwhelming trend being sheep and beef farms transitioning to Pinus radiata carbon forestry.[8] This scale of land use change, while potentially beneficial for carbon sequestration, requires careful local oversight to prevent adverse community and environmental outcomes. Without local authority discretion, this transition becomes an unmanaged market-driven process that prioritizes short-term carbon returns over long-term sector resilience and community sustainability.

Question 11: Does the proposal provide clarity and certainty for local authorities and forestry planning?

No. The proposal creates certainty for the forestry industry at the expense of local community needs, environmental challenges, critical sector resilience requirements, and local government enforcement and compliance. This represents a significant transfer of decision-making power from local representatives to central government and industry, while simultaneously entrenching dangerous monoculture practices.

The proposal effectively renders the exotic continuous cover forestry provisions within the existing NES-CF useless. Continuous cover forestry provides better biodiversity outcomes, reduced erosion risk, and

[5] Bell et al, 2025, p. 3.
[6] Mid Dome Wilding Trust
[7] Great South, 2023.
[8] Bell et al, 2025, p. 3.

improved forest resilience. However, continuous cover systems typically require greater investment in silviculture, expertise and harvesting, and involves more regular but lower-intensity management.[9] Without local regulatory mechanisms to incentivise such approaches in appropriate locations, there is no economic rationale for foresters to adopt these more environmentally beneficial practices over standard clear-fell regimes.

The changes provide clarity only in that they clearly restrict local authority discretion while offering no pathway to address the fundamental structural problems facing New Zealand forestry. Research demonstrates that forestry economics are hardwired around radiata pine, creating path dependency that these proposals will only strengthen.[10] The removal of local discretion eliminates a significant mechanism through which more resilient forestry practices could be encouraged.

The proposal essentially forces councils to accept forestry development regardless of local circumstances, community preferences, or opportunities to build sector resilience through diversification.

Question 12: How would the removal of 6(4A) impact you, your local authority or business?

The removal of Regulation 6(4A) would severely compromise Southland District Council's ability to guide sustainable land use change and address critical forestry sector vulnerabilities. This regulation provides essential flexibility for councils to manage afforestation location and scale according to local conditions and community needs.

Without this provision, Southland District Council loses the ability to prevent large-scale conversion of productive agricultural land to radiata pine monocultures, potentially leading to the permanent loss of rural communities and supporting infrastructure while simultaneously increasing systemic biosecurity risks. Research demonstrates that planting large areas with a single tree species increases the potential damage and rate of spread should a serious pest or disease establish in the country.[11]

The Emissions Trading Scheme already creates strong financial incentives for forestry conversion that often outweigh agricultural returns. Carbon forestry is driving unprecedented afforestation rates, with over 86,000 hectares established in 2022 alone, representing potential long-term commitments of land without adequate consideration of sector resilience.[12] Removing our ability to moderate these market forces through planning controls could result in rapid and irreversible landscape change toward an increasingly vulnerable monoculture system. The acceleration of land use change creates immediate economic displacement with lasting consequences for rural communities. Stock carrying capacity analysis indicates that every 1,000 hectares converted eliminates approximately 5,700-7,700 stock units, directly reducing local economic activity through decreased demand for farm services, reduced processing volumes, and diminished rural employment.[13] Unlike historical land use transitions from sheep to dairy farming, forestry conversion represents permanent removal of land from food production, with carbon-only forestry providing virtually no ongoing employment or economic activity in affected regions.

The removal would particularly impact our ability to promote mixed land use approaches, alternative species selection, or agroforestry systems that could provide carbon benefits while maintaining rural community viability and agricultural diversity. Analysis identifies significant potential in alternative approaches, including continuous cover forestry, mixed-species systems, and transitional forestry approaches that could address both environmental and economic objectives.[14]

[9] PCE, 2025.
[10] PCE, 2025.
[11] PCE, 2025.
[12] PCE, 2025.
[13] Beef + Lamb New Zealand, 2022, p. 3.
[14] PCE, 2025.

Furthermore, the shift toward permanent carbon forestry creates long-term maintenance obligations that may eventually fall to local communities. All forests need to be managed for the environmental pressures they face, and ongoing management requires ongoing investment.[15] If forestry companies dissolve or carbon revenues decline, communities may inherit degraded forest estates requiring expensive long-term management for pest control, fire prevention, and environmental protection.

Regulatory Impact Assessment and Multiple Legislative Proposals

New Zealand's forestry sector faces regulatory complexity as three major policy changes converge without coordinated assessment. The Climate Change Response (Emissions Trading Scheme—Forestry Conversion) Amendment Bill[16], Climate Change (Forestry) Amendments to the NZ ETS[17], and National Environmental Standards for Commercial Forestry create a new regulatory framework that reshapes land use economics while leaving critical policy interactions unexamined. This regulatory fragmentation is of concern to SDC regarding the impacts of land use change in our district, and we call for a holistic assessment of all proposed forestry policies.

No comprehensive coordinated regulatory impact assessment was conducted examining the combined effects of all three changes. While the government showed some recognition of coordination needs between the Emission Trading Scheme (ETS) review and permanent forest category redesign, this coordination did not extend to include NES-CF changes or farmland conversion restrictions.

The most significant unassessed interaction involves the relationship between carbon pricing incentives and local authority discretion removal. The Interim Regulatory Impact Statement (RIS) acknowledges that "depending on the price of carbon, this is likely to be worth at least several hundred million dollars to the forestry sector"[18] yet provides no analysis of how removing local authority controls will interact with these powerful economic incentives. This represents a fundamental analytical gap that could result in accelerated and unmanaged land use change.

The government's approach to ETS agricultural obligations changes scheduled for 2025 demonstrates further coordination failure. "Additional government policy related to managing afforestation includes the second Emissions Reduction Plan (ERP2) which contains several policies that incentivise afforestation, and policy proposals relating to public-private partnerships to plant trees on Crown land. The Government has also announced policy changes intended to limit how much farmland is converted to exotic forest and registered in the ETS."[19] Despite acknowledging these multiple policy instruments affecting the same land use decisions, no integrated analysis was conducted to understand their combined effects.

Regional impacts vary significantly based on land classification distributions and previous afforestation. Several of the proposed changes will shift afforestation from regions where it was historically concentrated, such as Gisborne, towards regions with less afforestation. The Southland District has historically seen low amounts of afforestation when compared to other regions, and the proposed changes to forest registration in Land Use Classification (LUC) 1-5, in our opinion, will result in more afforestation in our region.

The LUC classification changes combined with the proposed changes in the carbon sequestration of Pinus radiata, which would increase the carbon per hectare for those registering less than 100ha, could dramatically change the economics for commercial forestry, leading to new land use change behaviours.

[15] PCE, 2025.
[16] Climate Change Response Amendment Bill, 2025
[17] Te Uru Rākau, 2025a
[18] MPI, 2025a
[19] MPI, 2025a

These two legislation proposals have not been analysed to determine the intensity of afforestation and where afforestation will shift as a result of these combined proposals.

The regulatory coordination failures extend to fundamental systemic problems in government decision-making. "Cabinet has agreed that the objective of the proposals is to remove regulatory burden and uncertainty for the commercial forestry sector. This focus has limited the range of possible changes to the NES-CF to the problems identified in this document."[20] This narrow mandate prevented comprehensive policy integration and demonstrates that industry priorities rather than balanced analysis drove the scope of regulatory review.

Fundamental Evidence Limitations

The Interim Regulatory Impact Statement reveals evidence deficiencies that fundamentally undermine the credibility of these regulatory changes. The government explicitly acknowledges that "policy development has been progressed under tight timeframes. As a result, we have been unable to engage widely and the evidence to assess the proposals is therefore limited. This has in turn limited the scope and complexity of the analysis."[21] This admission represents a concerning departure from evidence-based policy development principles, particularly for changes that will have permanent impacts on local authority powers and land use patterns.

More critically, "the amended regulations have only been in place since late 2023, leaving little time for them to bed in and for their impacts to be fully understood."[22] The government is fundamentally altering regulatory frameworks before allowing sufficient time to assess whether the existing regulations are achieving their intended objectives. This premature intervention approach contradicts basic regulatory assessment principles and suggests policy decisions driven by political rather than evidence-based considerations.

The environmental monitoring deficiencies are particularly concerning, with the RIS acknowledging "there is no national monitoring programme for the NES-CF, and council environmental monitoring is usually carried out at a catchment level."[23] Without adequate baseline data or monitoring systems, the government cannot demonstrate either the problems these changes purport to solve or predict their environmental consequences. For Southland District Council, this evidence gap means we cannot properly fully assess the long-term environmental implications of removing our regulatory tools for managing forestry impacts.

Economic Analysis Deficiencies

The RIS reveals critical gaps in economic analysis that undermine the credibility of the proposed changes. "Data on the scale and impact of the problem, economic or cost/benefit analysis of the amendments, and information about consequent effects of any amendments progressed is limited."[24] The government is proceeding with major regulatory changes while acknowledging they lack basic economic impact data. The admission that "an independent CBA has been commissioned and is expected to help ensure the costs and benefits are more comprehensive"[25] demonstrates the government is making policy decisions before completing fundamental economic analysis.

For territorial authorities, this creates particular concerns about compliance and administrative costs. The RIS provides only vague acknowledgment that "some councils may incur initial administration costs if current plans need to be aligned with the new regulations"[26] without proper quantification of these

[20] MPI, 2025a
[21] MPI, 2025a.
[22] MPI, 2025a
[23] MPI, 2025a.
[24] MPI, 2025a.
[25] MPI, 2025a
[26] MPI, 2025a

impacts. The government has failed to assess the sunk costs in existing council planning processes that would be rendered obsolete, representing significant lost investment in democratic planning processes.

The regional economic implications are profound, yet unassessed across the multiple legislative changes. No analysis was conducted of differential regional impacts or how the combined policy changes might affect rural communities differently. For Southland, this analytical gap means we cannot properly assess the cumulative economic disruption potential when multiple regulatory changes affecting forestry investment decisions converge simultaneously.

In the Climate Change Response Amendment Bill, the Government proposes to limit registration of new exotic forests to 25% of a farm boundary in LUC classes 1-5.[27] Our research indicates that a larger proportion of the farm will be converted beyond the 25% threshold. In the afforestation notices, SDC reviewed notices contain a portion of the farm as non-useable land for afforestation, due to the current regulations in NES-CF (waterbody setbacks, property boundary setbacks, etc.). In some sites, this may represent a small percentage of the forested area, but in other sites, these non-useable areas may represent a significant proportion of the farm area. Research has indicated that roughly 20% of sheep and beef land would convert to commercial forestry if the ETS price were set to NZD 0.[28] If Pinus radiata is further incentivised via high carbon sequestration per hectare, this could push the value of commercial forestry way beyond the value of pastoral sheep and beef land.

With all of these changes in mind, it is likely, in our view, that a sheep and beef landowner would register 25% of their farm area into the ETS to get maximum economic gains for their land, and afforest potentially another 20% of their farm as non-ETS forestry, with forestry land use restrictions in mind. These afforestation activities may still represent a majority of their farm area, potentially leading to de facto full farm conversion where the pastoral activity is no longer maintained.

Southland District Council has significant concerns about land banking for full farm conversion to commercial forestry if the government proceeds with the current proposed changes to the Climate Change Response (Emissions Trading Scheme—Forestry Conversion) Amendment Bill. The interaction between the Climate Change Response (CCR) amendments and the proposed NESCF changes creates a particularly problematic scenario for our region.

The CCR Amendment Bill's 5-year cessation period for defining "unfarmed land" creates a clear pathway for strategic land banking. Forestry investors can purchase productive farmland, cease farming operations, wait five years, and then convert entire farms to forestry while claiming exemption from the 25% restriction as "unfarmed land." The financial incentive to engage in this strategic gaming is substantial.

This combination of regulatory reforms creates a perverse policy outcome where the CCR amendments appear to restrict farm conversions through the 25% allowance, while simultaneously providing a clear circumvention pathway that the NESCF changes would prevent councils from addressing. The result would be accelerated rather than controlled conversion of productive agricultural land to permanent forestry, directly contradicting both policies' stated objectives.

The current approach risks creating the worst of both worlds: apparent restrictions that can be easily circumvented through strategic planning, combined with removal of the local tools needed to address such circumvention.

Procedural Deficiencies

There are several intersecting pieces of all these proposed regulatory changes which have not been studied or examined to determine if the changes will have intended effect the government is seeking to achieve. In

[27] Climate Change Response Amendment Bill, 2025
[28] Kaye-Blake et al, 2024; see also Bell et al, 2024.

the regulatory impact statement, the Ministry highlighted how environmental interests highlighted the need for a more comprehensive review of the entire NES-CF, we agree.[29]

The Interim Regulatory Impact Statement acknowledges that feedback from councils has been mixed feedback, with some councils concerned about the impact of changes to NES-CF cl 6(4A).[30] If invited Southland District Council would have joined those voices raising mixed feedback. The regulatory impact statement goes on to detail the costs of repealing cl 6(4A), stating the change would not incur costs.[31] We disagree. In our submission we highlight issues and costs arising from an increasing forestry estate including: degraded forest estates requiring expensive ongoing management for pest and weed control to prevent ecological collapse; permanent ecological alterations, etc. All of these issues will have a cost for territorial authorities to manage these externalities. Removing the ability to pass regulatory change to reduce the costs from these externalities of forestry activity will hamstring our ability to effectively manage these costs. Furthermore, if the changes from the other proposed legislation changes accelerate the land use change to commercial forestry this may exacerbate long-term externalities for short or medium-term financial benefit.

The Interim Regulatory Impact Statement stated there was a limited window for engagement due to time pressures associated with RMA reform.[32] However, the consultation across the multiple forestry legislation proposals have been widely inconsistent. The Climate Change Amendments to the NZ ETS proposal had 28 working days for engagement[33], the NES-CF proposals (alongside RMA Phase 2 consultation) has 41 working days and the Climate Change Response Amendment Bill had 7 working days for consultation on the bill.[34] All of the legislative proposals were introduced at roughly the same window to conduct a comprehensive review of all regulatory changes as a whole package. If the shorter consultation window, used in the Climate Change Amendments, of 28 days was used it would have been possible for all submitters to examine the combined effects of all changes to make an informed and useful submission on the changes.

Conclusion

The impact statement indicates those who are closer to the issues are worried about the outcomes associated with the change, without the full assessment of all the changes to the forestry industry.

Local communities make land use decisions that reflect local values and conditions. These proposals, and the RIS show this proposal will transfer decision-making authority from local representatives to central government and industry interests with the appropriate consideration needed for such a decision.

Fundamental Concerns with the Proposal

Presumptive Rather Than Evidence-Based

The government's approach presumes that councils will implement aggressive restrictions limiting forestry activity, yet the consultation document itself states that this has not been borne out by facts. Southland District Council has not used Regulation 6 provisions restrictively, as insufficient time has passed since implementation for comprehensive policy development.

More fundamentally, the government is restricting local councils' regulatory tools based on hypothetical problems while ignoring demonstrated evidence of serious structural vulnerabilities in the forestry sector.

[29] Ministry of Primary Industries (MPI), 2025, pg. 4.
[30] MPI, 2025a, pg. 4.
[31] MPI, 2025a, pg. 5.
[32] MPI, 2025a, pg. 8, para. 51.
[33] Te Uru Rākau, 2025b
[34] Te Uru Rākau, 2025c

Research provides extensive documentation of monoculture risks, systematic barriers to diversification, and the need for coordinated approaches to build sector resilience.[35] This transfer of regulatory control occurs precisely when local oversight is most critical for addressing sector-wide vulnerabilities and building resilience. Research demonstrates that successful diversification requires local knowledge and coordination that can only be achieved through democratic planning processes.[36]

Regional Variation and Local Expertise

Southland faces unique environmental challenges requiring local expertise and flexible responses that the proposed amendments would eliminate. Research emphasises that successful alternative forestry systems require site-specific approaches, noting that alternative exotic species are known to grow as well across such a wide range of latitudes, altitudes and soil types in New Zealand, which necessitates a more tailored region-specific or site-specific approach to planting alternatives.[37]

The common consensus across our region is that more, not less, local control is needed to manage forestry effects that vary significantly between different areas and councils. A one-size-fits-all national approach cannot adequately address the complex interactions between forestry and adjacent conservation areas, threatened species habitats, rural communities, and tourism landscapes that characterise our district.

Southland's unique environmental risks include wilding pine spread into conservation areas[38], impacts on threatened and endangered species migration patterns, pest harbourage in commercial forests adjacent to pristine conservation land, productive agricultural land, and visual amenity impacts on landscapes critical to our tourism economy. The proposed amendment would prevent us from addressing these legitimate regional concerns through appropriate planning controls that could simultaneously encourage more resilient forestry practices.

Research demonstrates that diversification requires coordination that can only be achieved through local planning processes: for alternative forestry species to be economically viable, there would also need to be a coordinated approach to deciding what to plant where, to justify the development of local infrastructure and markets.[39]

Biosecurity and Resilience Risks

Pathogens

The restriction to "severe erosion" as the primary criterion fails to recognise both the multifaceted challenges our region faces and the critical need for forestry sector diversification. Recent research demonstrates that New Zealand faces mounting biosecurity risks from radiata pine monoculture. Research documents specific threats, including red needle cast disease, first recorded in 2008, now affecting most areas of the North Island and many parts of the South Island, with a reduction in growth as much as 35% in the stem basal area.[40] Red needle cast infections in the Gisborne region exploded from affecting only 1% of monitored plots in 2020 to 52.7% with severe infections by 2023.[41]

The biosecurity risk is not limited to Red needle cast. Pine pitch canker, Fusarium carinatum, represents a critical biosecurity threat not yet present in New Zealand. This pathogen can kill seedlings while causing

[35] PCE, 2025.
[36] PCE, 2025.
[37] PCE, 2025.
[38] Bowman R., 2025.
[39] PCE, 2025.
[40] Watt et al, 2024.
[41] Watt et al, 2024.

adult trees to lose entire canopies; and brown spot needle blight causing severe damage internationally, with both severity and spread increasing in response to climate change.[42]

International evidence shows these pathogens have made radiata pine uneconomical in some traditional planting regions around the world.[43] Research concludes that planting large areas with a single tree species increases the potential damage and rate of spread should a serious pest or disease establish in the country.[44] Removing local discretion eliminates a major mechanism through which this risk could be managed through species diversification and improved silvicultural practices.

The amendment removes a major mechanism for encouraging alternative forestry systems that could address these vulnerabilities. Comprehensive analysis has identified twelve commercially viable alternative exotic species, including coast redwood, eucalypts, cypresses, and poplars, noting that alternative exotic species can complement radiata pine forests by offering diverse traits with different environmental benefits as well as novel commercial and land use opportunities.[45]

Wilding

New Zealand faces a wilding conifer spread affecting over 2 million hectares, spreading at 90,000 hectares annually,[46] with potential economic costs between $1.9-3.8 billion at current levels.[47] In our neighbouring region, Otago, it was estimated to have losses up to $2.1 over 50 years.[48] Southland faces one of New Zealand's most severe wilding tree threats, with over 100,000 hectares of high-country pastoral and tussock grassland at immediate risk.[49] Further, the issue of wilding is not being contained, predictions indicate total wilding area to increase at a rate of 6% per year.[50] The risks of wilding conifers include, outcompeting revegetating native vegetation, reducing water flows in catchments, impact to landscape values, and more.[51] In Mid Dome, an area in Southland with wilding pines, there has been a reduction in water yields ranging from 30% to 81%.[52] To date there has been $20 million in mitigation activities to reduce the impact of wilding pines at Mid Dome.[53] The work with Mid Dome Wilding Pine Trust has dealt with historic plantings, but new Douglas Fir afforestation notices risk prolonged new wilding pine issues for Mid Dome.[54] The proposed NES-CF amendments removing local authority discretion would eliminate prevention mechanisms just when they are most needed, creating severe biosecurity and environmental risks. The current wilding pine issues have been occurring due to historic plantings.[55] However, Southland District Council is still seeing commercial forestry afforestation notices with species of high wilding potential in our District.

One of the easiest methods to stop further wilding spread is prevention, rather than mitigation. If local councils can stop new commercial forestry utilizing species of high wilding potential it can stop millions of dollars of damage. Evidence from successful regional programs demonstrates that local authority oversight through resource consent processes, regional pest management plans, and coordinated control programs provides the most cost-effective defense against landscape-scale invasions, delivering cost-benefit ratios of

[42] PCE, 2025.
[43] PCE, 2025.
[44] PCE, 2025.
[45] Jones et al, 2023.
[46] MPI, 2025b.
[47] Watt, S., 2022. see also Manaaki Whenua Land Research, 2018.
[48] Williams M., 2023.
[49] Mid Dome Wilding Trust
[50] Greenaway et al, 2015.
[51] Froude V., 2011.
[52] Mid Dome Wilding Trust
[53] Bowman R., 2025.
[54] Bowman R., 2025.
[55] Edwards et al, 2020.

20:1 to 34:1.[56] In the Otago region the measured cost-benefit ratios of wilding pines to be 42:1 to 96:1.[57] However, to deliver those benefits Otago Regional Council would have to spend between $18 to $38 million over the next decade.[58]

Without constant funding to maintain wilding pine control these areas will re-infest losing hard won progress fought by local authorities. Those are funds, and constant need for future funds, could be used other critical services Otago Regional Council could provide to its constituents that are being spent on wilding pine control. Removing the ability for territorial authorities to make more stringent, targeted regulations at the establishment phase of high wilding species afforestation will force these bodies to depend only on mitigation measures rather than preventative regulations. Allowing commercial forestry to afforest with species of high wilding potential with little local intervention will divert precious, scarce funding from other core responsibilities of territorial authorities to mitigating new wilding pines, which under the current regulatory framework we can prevent. Instead, the government should retain cl 6(4A) so local authorities can prevent further spread of wilding pines in regions, like Southland.

Systematic Barriers to Forestry Diversification

The proposed amendments will exacerbate existing systematic barriers that prevent forestry sector diversification and resilience building. As previously discussed in the submission, further investment in monoculture forestry will exacerbate risks such as vulnerability to pathogens and wilding pines.

Current market and regulatory barriers significantly constrain alternative species deployment. Established production chains are optimised for radiata pine, with domestic building codes being defined around radiata pine products exclusively.[59] Recent market analysis demonstrates the fundamental economic drivers behind this monoculture expansion. Economic modelling indicates that carbon forestry generates internal rates of return exceeding 32% at current carbon prices, compared to 6.3% for production forestry without carbon income.[60] While these returns demonstrate forestry's economic viability, they also highlight the risk of economically driven land use decisions that may not align with optimal environmental or community outcomes. Research suggests that a typical new Pinus radiata plantation valued at $26,000 per hectare in net present value terms significantly exceeds sheep and beef farming returns, which reach only $16,000 per hectare even at the upper end of the valuation range.[61] This economic differential necessitates local planning oversight to ensure transitions do not result in detrimental effects on the environment and that forestry occurs in appropriate locations and supports broader regional objectives.

Economic Structure Barriers: The economics of forestry in New Zealand is hardwired around the clear-fell harvest of radiata pine, with coordinating a shift towards alternatives incurring significant costs to fill in the many unknowns.[62] The removal of local discretion eliminates several key mechanisms Southland District Council could employ for market-making, creating a robust forestry industry where coordination costs could be managed and alternatives incentivised.

Knowledge and Development Gaps: Research identifies significant knowledge gaps for alternative species, noting that key forestry stakeholders know less about virtually every step involved in establishing and managing alternative forests for timber or any other purpose.[63] Local planning processes provide opportunities to build this knowledge through targeted trials and adaptive management approaches. Under the current NES-CF regulations, territorial authorities could establish experimental forestry zones within

[56] National Wilding Conifer Control Programme, 2024.
[57] Williams M, 2023.
[58] Williams M, 2023.
[59] Jones et al, 2023.
[60] PCE, 2025.; see also Bell et al., p. 5.
[61] Bell et al, 2025, p. 5.
[62] PCE, 2025.
[63] PCE, 2025.

rural production areas, require comprehensive development plans for species diversification proposals, and use resource consent pathways specifically designed for forestry alternatives to Pinus radiata and clear fell forestry.

Supply Chain and Infrastructure Limitations: The current and proposed amendments fail to address wider issues of supply chain diversity. Alternative species face significant gaps across the supply chain from seedstock production to processing infrastructure.[64] Local planning can coordinate regional approaches that address these gaps systematically.

Carbon Market Distortions: The Emissions Trading Scheme creates perverse incentives that strongly favour radiata pine monoculture. The NZ ETS essentially provides a system that allows a tonne of fossil carbon released into the atmosphere to be traded for a tonne of carbon sequestered in a tree, but measurement systems are most developed for radiata pine while native forests are treated as a single class of forest with the same physical attributes across the entire country.[65] This system drives land use change toward monoculture without consideration of resilience or long-term sustainability.

Economic and Social Sustainability

Permanent exotic forests have been calculated to generate three times greater economic return per hectare than sheep and beef farms at $35 per tonne carbon prices, rising to seven times greater at $70 per tonne.[66] This creates unprecedented pressure for land use change that requires democratic oversight to ensure community interests are protected.

The regional concentration of these investments creates additional challenges. While Southland has experienced lower commercial forestry in the past increased activity, representing 9% of 2023 land sales to forestry and 15% of early 2024 activity, the overall pattern demonstrates systematic targeting of Southland for future commercial forestry land change.[67]

The scale of land use conversion has accelerated nationally, with implications that extend beyond Southland. Analysis of farm sales demonstrates that 2022 saw an increase in conversions, with 63,956 hectares of farmland sold for forestry purposes, revised significantly upward from initial estimates of 35,508 hectares due to delays in Overseas Investment Office processing and conditional sale agreements.[68] While 2023 and early 2024 have shown some moderation, with 17,638 hectares and 5,205 hectares respectively, this reduction appears linked to policy uncertainty rather than fundamental market changes.[69]

The economic implications are profound. Independent analysis indicates that farm production losses from land use conversion could reach $170 million annually at farm gate prices, with cumulative losses of $540 million already realised from progressive planting between 2017 and 2022.[70] Export revenue losses are estimated at $245 million annually, representing a significant transfer of earnings from export generation to domestic carbon trading.[71]

The shift toward permanent carbon forestry creates unprecedented long-term management challenges that the proposed amendments fail to address. Research emphasises that ongoing management will require ongoing investment and asks critical questions about how this will be provided and whether it should be determined at the outset, before planting starts.[72] Given the permanence of this forestry (akin to the

[64] PCE, 2025.
[65] PCE, 2025.
[66] PCE, 2025.
[67] Orme & Associates Limited, 2024, p. 7.
[68] Orme & Associates Limited, 2024, p. 6.
[69] Orme & Associates Limited, 2024, p. 7.
[70] Beef + Lamb New Zealand, 2022, p. 3.
[71] Beef + Lamb New Zealand, 2022, p. 3.
[72] PCE, 2025.

effects of mining activities) in sterilising the land for other purpose, it would be reasonable that national regulation require posting of a long term management bond on which central and local government could draw in the event of management failure.

Permanent forests create potential long-term liabilities for local communities if forestry companies dissolve or carbon revenues decline. Research notes that taking a longer-term view of forestry requires consideration that the people maintaining the forest which may be several generations away from those who start it.[73]

Without adequate planning oversight, communities may inherit degraded forest estates requiring expensive ongoing management for pest and weed control to prevent ecological collapse; permanent ecological alterations, fire prevention and management as climate change increases wildfire risks; infrastructure maintenance for access and monitoring; and environmental protection to prevent erosion and water quality degradation.

Research demonstrates legitimate economic concerns about large-scale forestry conversion, including potential community disruption and GDP loss.[74] Current ETS incentives already favour forestry over traditional agricultural land uses, creating pressure for permanent land use changes that may not serve long-term regional economic interests.

Research warns that using forestry to offset ongoing carbon dioxide emissions locks up increasing amounts of land in forestry in perpetuity and imposes a burden on future generations who must continue to pay for afforestation and the ongoing maintenance of the expanding forest estate.[75]

Removing local planning tools eliminates the ability of local communities to have input to economic transitions, community protection mechanisms and management of adverse impacts. An essential component of the "property rights" paradigm expressed by central government is avoiding negative impacts on the property of others. The NES-CF offers little protection in this regard.

Environmental Protection

Research documents that alternative forestry systems can provide superior environmental outcomes, including improved biodiversity outcomes through continuous cover management and mixed-species systems; enhanced water quality and soil protection through species selection and silvicultural approaches; reduced wildfire risks through species diversification and appropriate management; and better long-term carbon sequestration through resilient forest systems.[76]

Wilding pine management, threatened species protection, pest control, and landscape protection require flexible regulatory responses that the proposed changes would eliminate precisely when they are most needed to address sector vulnerabilities. These are all issues that be highly location specific and require local solutions.

We acknowledge that appropriately located and managed forestry can deliver superior environmental outcomes compared to intensive pastoral farming. Research confirms that forestry produces significantly lower nitrogen and phosphorous losses to water, with forest land uses contributing approximately 4 kilograms of nitrogen per hectare annually compared to substantially higher rates from dairy farming.[77] However, these environmental benefits can only be maximized through careful site selection and species diversification - precisely the outcomes that local authority discretion enables but the proposed amendments would eliminate.

[73] PCE, 2025.
[74] Great South, 2023.
[75] PCE, 2025.
[76] PCE, 2025.
[77] Bell et al, 2025, p. 32

Question 14: Do you support a site-specific risk-based assessment approach or a standard that sets size and/or volume dimensions for slash removal?

Southland District Council supports maintaining clear, objective standards rather than subjective risk assessments. While our district does not currently face significant slash mobilisation risks due to terrain, we recognise that climate change may increase wildfire risks, making slash management relevant for fire prevention rather than erosion control. Objective standards based on regional criteria would be the most effective approach.

However, the focus on slash management, while important, addresses symptoms rather than underlying causes. Research demonstrates that continuous cover forestry systems and alternative species can significantly reduce slash-related risks while providing additional environmental benefits.[78] The proposed amendments remove the primary mechanism through which such improvements could be achieved.

Question 20: Do you support the proposed removal of the requirement to prepare afforestation and replanting plans?

No. Southland District Council strongly opposes removing afforestation and replanting plan requirements. This proposal would significantly compromise our regulatory effectiveness, community protection, and ability to encourage forestry sector resilience.

These plans provide essential information for monitoring compliance with permitted activity conditions and represent a critical opportunity to encourage species diversification and improved forestry practices. Research demonstrates that radiata pine monoculture creates significant vulnerabilities, noting that diversification requires coordination and local knowledge that can only be achieved through planning processes.[79]

The removal would create several specific problems for Southland District Council:

Information Access: Currently, obtaining GIS information to track commercial forestry from basic notifications is challenging. Many foresters do not provide comprehensive spatial information, creating resource burdens as we must solicit and manually plot missing data. Management plans provide standardised information that enables efficient monitoring and creates opportunities to encourage best practices.

Species Selection and Silviculture Oversight: In the circumstances where local authority controls on forestry activities are limited, the requirement to prepare and supply if requested a forestry management plan enables councils to better plan for the potential consequences of forestry, particularly the likely spread of wilding species.

Long-term Community Protection: Permanent carbon forests create long-term liabilities that extend far beyond the initial planting decision. Planning processes allow councils to assess whether forest operators have adequate long-term maintenance plans, protecting communities from potential future abandonment of degraded forest estates.

Wilding Pine Management: Wilding pine calculations provided in Southland are often wildly inconsistent, with questionable methodologies. We have encountered instances where foresters claim grazing land classifications for areas directly adjacent to conservation land managed by the Department of Conservation. Requiring detailed calculation documentation allows local enforcement to identify gaming of the system and ensure appropriate risk mitigation measures.

Discretionary Application: Contrary to the government's characterisation of these plans as universally burdensome, Southland District Council applies discretion in requiring management plans, focusing on

[78] PCE, 2025.
[79] PCE, 2025.

situations where additional information is genuinely needed. This targeted approach balances regulatory efficiency with environmental protection and sector improvement. It is also concerning to think that major forestry operations (e.g. hundreds of hectares) would be undertaken by forestry companies without creating site specific forestry management plans.

Proportional Requirements: These management plans represent minimal costs relative to the substantial revenue and profit generated by forestry activities. The documentation requirements encourage comprehensive planning, and demonstrate due diligence in environmental risk management.

Without access to these plans, our ability to protect the community from forestry-related environmental risks would be severely compromised, while the cost savings to industry would be negligible.

Question 21: Do you support the proposed minor text amendments?

We support technical clarifications that improve regulatory clarity and consistency. However, these minor improvements do not address our fundamental concerns about the broader removal of local authority discretion and planning tools.

Recommendations

Southland District Council recommends:

Recommendations:

1. **Retention of Regulation 6 provisions** in their current form to maintain essential local authority discretion in managing forestry impacts according to regional conditions, community needs, and sector resilience requirements.
2. **Retention of afforestation and replanting plan requirements** as essential tools for effective monitoring, compliance, environmental protection, and forestry sector improvement.
3. **Integration of forestry policy with broader environmental and economic objective**s including climate change adaptation, biodiversity protection, and rural community sustainability.
4. **Development of National Authority/Forum:** If Central Government is set on forestry standards developed at the national level the government should create an authority which can develop regional and sub-regional standards and approaches that then become mandatory requirements for permitted activities under the NES-CF. Development of these standards would be created collaboratively with key stakeholders such as forestry companies, central government agencies, regional and local governments.
5. **Recognition of regional variation** in forestry impacts and the need for locally responsive regulatory frameworks.
6. **Enhancement rather than restriction of local authority tools** to encourage forestry sector diversification, including specific provisions to incentivise alternative species, continuous cover forestry, and other resilience-building approaches.
7. **Postponement of proposals pending adequate evidence and coordination** until the government completes the acknowledged missing comprehensive cost-benefit analysis, coordinated regulatory impact assessment of all three forestry policy changes, and adequate consultation with affected communities.
8. **Genuine consultation** with local authorities before implementing changes that fundamentally alter the balance between national consistency and local control.
9. **Evidence-based policy development** that addresses demonstrated problems with current regulatory arrangements, including systematic barriers to forestry diversification and mounting biosecurity risks, rather than hypothetical concerns about council restrictions.

10. **Coordinated regulatory assessment** examining the combined effects of NES-CF amendments, Climate Change Response Amendment Bill, and ETS forestry changes to understand cumulative impacts on land use patterns and regional economies.
11. **Comprehensive assessment of long-term forest management obligations** including mechanisms to ensure ongoing maintenance funding and prevent community liabilities from abandoned forest estates.
12. **Long-term management bond requirements** for permanent carbon forestry to protect communities from potential liabilities if forestry companies dissolve or abandon forest estates, ensuring ongoing funding for pest control, fire prevention, and environmental protection.
13. **Biosecurity risk management provisions** specifically addressing pathogen threats (red needle cast, pine pitch canker) and wilding pine spread, including species diversification requirements in high-risk areas.
14. **Supply chain diversification requirements** addressing gaps from seedstock production to processing infrastructure, coordinated through local planning processes to build regional capacity for alternative species.

Conclusion

The proposed changes to the National Environmental Standards for Commercial Forestry represent a significant erosion of local democratic control over land use decisions that will have lasting negative impacts on Southland's communities, environment, economy, and New Zealand's forestry sector resilience.

The government is proceeding with major regulatory changes while explicitly acknowledging in its own Interim Regulatory Impact Statement that it has "limited evidence," inadequate analysis, and insufficient consultation time. No coordinated assessment was conducted of three simultaneous forestry policy changes that will reshape land use economics across New Zealand. This represents a fundamental departure from evidence-based policy development principles, with the government admitting it is making permanent changes to local authority powers before understanding their impacts.

The evidence presented demonstrates specific, measurable threats that these changes will exacerbate: red needle cast disease affecting 52.7% of monitored forest plots with severe infections; wilding conifers spreading across 2 million hectares at 90,000 hectares annually with potential economic costs of $1.9-3.8 billion; and farm production losses of $245 million annually from land use conversion. These are not hypothetical concerns but documented, escalating problems requiring coordinated local responses that the proposed amendments would eliminate.

The removal of local discretion occurs precisely when carbon forestry economics (32% returns vs 6.3% for production forestry) create unprecedented pressure for land use change. This will accelerate conversion of productive agricultural land while creating potential long-term liabilities for communities who may inherit degraded forest estates requiring expensive ongoing management if forestry companies dissolve or carbon revenues decline.

These changes prioritise short-term industry convenience over environmental protection, community wellbeing, local democratic processes, and critical long-term sector sustainability. The amendments will exacerbate dangerous over-reliance on radiata pine monoculture precisely when diversification and resilience-building should be national priorities.

Comprehensive research demonstrates that New Zealand forestry faces mounting challenges requiring coordinated responses that can only be achieved through local planning processes. The proposed amendments eliminate the primary mechanism through which these challenges could be addressed while providing no alternative pathway for sector improvement.

Southland District Council Submission on Proposed Changes to NES-CF

The removal of local discretion will render useless existing provisions for alternative forestry approaches within the NES-CF, representing a significant missed opportunity to build sector resilience and address documented environmental and biosecurity risks.

Southland District Council urges the government to reconsider these proposals and instead work collaboratively with local authorities to develop regulatory frameworks that balance national consistency with essential local flexibility, democratic accountability, and forestry sector resilience.

We request that our concerns be given full consideration in the government's final decision-making process, that genuine consultation with local authorities be undertaken before implementing any changes, and that the demonstrated need for forestry sector diversification and resilience-building be prioritised over hypothetical concerns about local authority restrictions.

Southland District Council supports sustainable commercial forestry that contributes to environmental protection, carbon sequestration, and economic development. However, achieving these benefits requires maintaining the local authority tools necessary to guide appropriate forest establishment, encourage species diversification, and protect community interests. The proposed changes to the National Environmental Standards for Commercial Forestry eliminate these essential safeguards while entrenching the very monoculture practices that threaten long-term sector sustainability. We urge the government to work collaboratively with local authorities to develop regulatory frameworks that harness forestry's environmental and economic potential while preserving local oversight and sector resilience.

References

Beef + Lamb New Zealand, Afforestation report shows whole farms are being converted into carbon forests at alarming rates, October 2022.

Bell, K., Sharples, A., Frean, G., Jordan, K., & Barker, A. (2025). Optimising policy to achieve environmental goals for agriculture. SSRN Working Paper.

Bowman, R. (2025). Douglas fir—the 'next wave' of wildings reporting recent spread of wilding Douglas fir in the southern South Island, NZ Wiling Pine Network.

Climate Change Response (Emissions Trading Scheme—Forestry Conversion) Amendment Bill, 2025

Dungey, H., Stovold, T., Dodunski, C. and Bulman, L. (2020). The current and future potential of contingency species to mitigate biosecurity risk for the New Zealand forest sector. Scion Report SWP-T122.

Edwards P., Stahlmann-Brown, P., Simon T., 2020. Pernicious pests and public perceptions: Wilding conifers in Aotearoa New Zealand, https://doi.org/10.1016/j.landusepol.2020.104759

Froude, V., 2011 Wilding conifers in New Zealand: beyond the status report. Report prepared for the Ministry of Agriculture and Forestry., ISBN: 978-0-478-40011-3

Greenaway, A., Samarasinghe, O., Rees, T., Bayne K., Velarde, S., Heaphy, M., Paul T., Kravchenko A. 2025, Evaluating (non-market) impacts of wilding conifers on cultural values

Great South, Beyond 2025 Southland Regional Long Term Plan, 2023. https://greatsouth.nz/assets/Documents/231121_B2025_Summary-Document-VERSION-2-NOV-2023-Web-Singles.pdf

Jones, A., Steer, B., Salekin, S., Meason, D., Stovold, T. (2023). Final report: Stock Take of the Commercially Viable Alternatives to Pinus Radiata. Scion

Kaye-Blake B., Webster-Brown J., Aporo, N., McAleer A., 2024, Why Pines? A context for recent research results which appear to support land conversion into Pine Forestry.

Manaaki Whenua Land Research, 2018. Combating wilding conifers, https://www.landcareresearch.co.nz/news/combating-wilding-conifers/

Mid Dome Wilding Trust, https://www.middomewildingtreestrust.co.nz/what-we-do/

Ministry of Primary Industries (MPI), Ministry of the Environment, 2025. Regulatory Impact Statement: National Environmental Standards for Commercial Forestry, https://environment.govt.nz/assets/Interim-Regulatory-Impact-Statement-NES-for-Commercial-Forestry.pdf

MPI, 2025b. Wilding conifer control in NZ, https://www.mpi.govt.nz/biosecurity/exotic-pests-and-diseases-in-new-zealand/long-term-biosecurity-management-programmes/wilding-conifers/

National Wilding Conifer Control Programme, 2024. About the National Programme, https://www.wildingpines.nz/national-control-programme

Orme & Associates Limited, 2024, Land-use change from pastoral farming to large-scale forestry Update, September.

Parliamentary Commissioner for the Environment (PCE), 2025, Alt-F Reset: Examining the drivers of forestry in New Zealand.

Te Uru Rākau, 2025a, Proposed changes to forestry in the New Zealand Emissions Trading Scheme (NZ ETS) Updates to forest types and default carbon tables for exotic forests and other regulatory

amendments, New Zealand Forest Service Discussion Paper No: 2025/01, ISBN No: 978-1-991345-55-4

Te Uru Rākau, 2025b, Proposed updates to forest types and default carbon tables for exotic forests in the NZ Emissions Trading Scheme and other regulatory amendments, MPI Website, https://www.mpi.govt.nz/consultations/proposed-changes-to-forestry-in-the-nz-ets/

Te Uru Rākau, 2025c, Limits to converting farmland to exotic forestry registered in the ETS, MPI Website, https://www.mpi.govt.nz/forestry/forestry-in-the-emissions-trading-scheme/news-and-changes-to-the-ets/#changes-2025

Wyatt, S., 2022, Benefits and Costs of Additional Investment in Wilding Conifer Control, Sapere, https://www.mpi.govt.nz/dmsdocument/58519-2022-Benefits-and-costs-of-additional-investment-in-wilding-conifer-control

Watt, M.S.; Holdaway, A.; Watt, P.; Pearse, G.D.; Palmer, M.E.; Steer, B.S.C.; Camarretta, N.; McLay, E.; Fraser, S. Early Prediction of Regional Red Needle Cast Outbreaks Using Climatic Data Trends and Satellite-Derived Observations. Remote Sens. 2024, 16, 1401. https://doi.org/10.3390/rs16081401

Williams, M., Rohani, M., 2023. Benefits and Costs of Additional Investment in Wilding Conifer Control in the Otago Region.

National Policy Statement for Natural Hazards

Executive Summary

The proposed NPS-NH should apply to all natural hazards, including those arising from climate change, not just the seven listed in the NPS-NH. Guidance regarding use of climate scenarios is needed.

The NPS-NH should apply to all new subdivision to ensure consistent natural hazard risk management across New Zealand. However, consideration should be given to appropriate exemptions

The decision to exclude infrastructure and primary industries from the NPS-NH is potentially problematic.

Limited effectiveness is expected. The proposed NPS-NH will not improve natural hazard risk management in Southland district to any significant degree. As a transitional measure pending more comprehensive reforms including a climate adaptation framework, the NPS-NH has inherent limitations. A National Environmental Standard would better achieve the purpose.

We support proportionate management in principle, the term "proportionately" is not defined and is open to interpretation, which could lead to inconsistent approaches across different authorities. Guidance should be provided to authorities to enable consideration of vulnerability and intolerable levels of risk.

We support the requirement for local authorities to use the best available information in planning and resource consent decision-making, as this is fundamental to effective natural hazard risk management. However, it will be difficulty to assess natural hazard risk without access to information. Central government should provide resource and support to generate this information for the Southland district.

Implementation will have significant impacts on applicants and decision-makers. It will increase costs for applicants and require decision-makers to amend their processes and increase capability of staff. Central government should provide resource and support to enable a smooth transition.

Southland District Council supports the Government's intent to strengthen the National Policy Statement for Renewable Electricity Generation to achieve climate and electrification targets. However, we have significant concerns about ensuring adequate protection for local communities and Outstanding Natural Features and Landscapes in our region.

Key Messages:

1. **Community Benefits Must Be Prioritised:** REG projects must deliver tangible benefits to local communities, not just regional or national benefits. Communities hosting these projects should receive direct energy allocations and community improvement funds.
2. **Outstanding Natural Landscapes Remain a Constraint:** Southland's potential wind farm sites often overlap with areas identified as Outstanding Natural Features and Landscapes. The tension between REG development and landscape protection remains unresolved and will continue to be a primary limiting factor.
3. **Support for Existing REG Protection**: We strongly support measures to protect and enable existing renewable electricity generation assets.
4. **Community-Led Development Model:** The Rakiura/Stewart Island solar project demonstrates the effectiveness of community engagement and direct local benefits in achieving renewable energy goals.

Bottom Line Recommendation: Amend Policy A to explicitly require that REG projects demonstrate local community benefit through energy allocation and community improvement measures, while maintaining strong protection for Outstanding Natural Features and Landscapes until Phase 3 RMA reform clarifies this framework.

Detailed Submission

Scope of the proposed NPS-NH and definitions

71. Should the proposed NPS-NH apply to the seven hazards identified and allow local authorities to manage other natural hazard risks?

Response: Yes

The proposed NPS-NH should apply to all natural hazards, including those arising from climate change. There are hazards that have not made it into the list of seven, for example wildfire, that warrant close attention and should not be left out of the list. It is more appropriate that the NPS-NH apply to all natural hazards, which allows discretion for councils to include all relevant natural hazards.

The NPS-NH should make it clear that consideration needs to be given to the cumulative and cascading impacts of multiple hazards.

72: Should the NPS-NH apply to all new subdivision, land use and development, and not to infrastructure and primary production?

Yes.

Southland District Council supports the proposed broad application scope, with reservations about potential exemptions such as boundary adjustments.

The significant risk matrix provides a framework whereby low-risk activities, including subdivisions, should be able to proceed without requiring extensive proportionate risk management. This creates a pathway for activities where minimal changes are introduced or where the activity is not inherently prone to natural hazard risk to progress through the resource consent process while giving Council the ability to determine if proposed activities are inherently safe.

A consistent approach to treating all applications identified in natural hazard areas provides operational benefits. The proportionate management process would determine the level of risk management required rather than applying different standards at the application stage. This approach would reduce implementation difficulties and concerns from constituents who may complain about differential treatment between similar applications.

Consistent application also provides decision-makers with a standardized framework, reducing edge cases and avoiding scattered implementation processes that can create confusion and inequitable outcomes. While Southland District Council recognizes the appeal of exemptions for activities such as boundary adjustments, we have significant concerns about potential circumvention of the NPS-NH requirements. Our experience with the National Policy Statement for Highly Productive Land demonstrates how exemptions can be exploited.

With professional assistance, applicants identified that creating new lots in Highly Productive Land would prove difficult and result in higher rejection rates. Instead, they utilized boundary adjustments—a controlled activity in the rural zone under our current plan—to create 'pseudo' lots where new permitted activities such as dwelling establishment could occur within the permitted baseline.

Similar gaming is anticipated with the current planning rules in our District Plan if exemptions are introduced to the NPS-NH. Exemptions would likely increase attempts by applicants to circumvent natural hazard requirements to gain approval for activities within hazard-prone areas.

Southland District Council Submission on Proposed Changes to NPS-NH

While we recognize the merit of common-sense approaches for subdivisions with clearly lower risk profiles, we believe exemptions will be exploited by applicants, potentially enabling adverse outcomes where activities occur in areas they should avoid. This places Council in the difficult position of accepting suboptimal decision outcomes that undermine the NPS-NH's risk management objectives.

Recommendation

Maintain broad application without specific exemptions, allowing the proportionate management approach and risk matrix to differentiate between low and high-risk activities rather than creating categorical exemptions that invite circumvention.

Objective

73. Would the proposed NPS-NH improve natural hazard risk management in New Zealand?

Response: No

The NPS-NH will not improve natural hazard risk management in Southland district in the short-term, unless it is given effect to through a plan change. The NPS-NH will not be effective a transitional measure pending more comprehensive reforms including introduction of a climate adaptation framework

Risk-based approach

74. Do you support the proposed policy to direct minimum components that a risk assessment must consider but allow local authorities to take a more comprehensive risk assessment process if they so wish?

Response: Unsure.

While Southland District Council supports the principle of establishing minimum components for risk assessments to ensure consistency, we have concerns about the immediate implementation challenges this approach would create.

Policy 1 would place a new burden on applicants to provide comprehensive risk assessment information when council-held natural hazard data is incomplete or inaccurate. Where existing natural hazard reports lack the specific components required under Policy 1 (likelihood, consequences, mitigation measures, and residual risk), applicants would be required to commission additional assessments to meet these standards.

This represents a shift in responsibility and cost from councils to individual applicants. However, there may be limited information or specialist expertise available in local communities to undertake such assessments. This constraint could either price out smaller applicants or significantly delay the resource consenting process, particularly for rural or remote areas where specialist services are less accessible.

Furthermore, if substantial baseline hazard information is not available to specialists in the area, their ability to determine the likelihood, consequences, and residual risk components required under Policy 1 may be fundamentally limited. This creates a circular problem where applicants are required to provide information that cannot be reliably determined due to underlying data gaps, yet Policy 6 directs that risk assessment processes must continue despite incomplete information.

The practical result may be highly variable quality in risk assessments submitted by applicants, dependent on the availability of local expertise and baseline hazard data, which undermines the policy's objective of achieving consistent risk-based decision making.

Southland District Council Submission on Proposed Changes to NPS-NH

A fundamental issue exists in the broader natural hazard reporting framework. Natural hazard identification often occurs outside the planning process, where requirements for local authorities regarding the specifics of natural hazard information are less stringent compared to planning process requirements. Policy 1 extends detailed assessment requirements specifically to the planning process, but there is no corresponding regulatory oversight on the quality or specifics of hazard reports received from other sources.

This disconnect could result in ongoing implementation difficulties where councils receive natural hazard information that does not meet the minimum components outlined in Policy 1, yet are expected to apply these standards in planning decisions.

If Southland District Council must publicly communicate discrepancies in natural hazard information to address implementation issues, this could further complicate NPS implementation. For example, where the spatial extent of a natural hazard report is disputed or challenged through post-adoption review, this could dramatically reframe how Council considers resource consents for disputed areas.

Such situations would require Council to either reauthor the information at considerable cost, or issue clarifying notes acknowledging inaccuracies in the plan. The latter approach would effectively require applicants to fully determine 'significant risk' through individual applications, undermining the efficiency goals of the risk-based approach.

Recommendation

A more holistic approach to natural hazard reporting standards across all relevant processes would better support the policy's objectives. Establishing consistent requirements for natural hazard information regardless of the source or initial purpose would ensure better alignment between hazard identification and planning application requirements.

75. How would the proposed provisions impact decision-making?

The proposed provisions will require Southland District Council to make changes to its processes and to increase capability and capacity for natural hazards decision-making. It will result in extra costs to applicants, and may lead to frustration, particularly where there is limited or unclear natural hazard information available. It will be difficult to achieve the objectives of the NPS-NH without good quality, up to date information about natural hazards.

76. Do you support the placement of very high, high, medium and low on the matrix?

Yes, with modifications.

In the matrix, an 0.2 – 1% AEP event with a catastrophic consequence is classed as “medium” risk. This should be “high”.

The assessment of the likelihood of a natural hazard impact arising from or exacerbated by climate change will differ based on the emissions scenario used. The NPS-NH does not specify which emissions scenario should be used. If the emissions scenario used is too low, there is a risk that the assessment will result in a lower risk level than is appropriate.

77. Do you support the definition of significant risk from natural hazards being defined as very high, high, medium risk, as depicted in the matrix?

Unsure.

Southland District Council Submission on Proposed Changes to NPS-NH

Southland District Council in principle supports the idea of a standardized approach to significant risk; however, we have significant concerns on the implementation of the definition of significant risk as currently structured in the matrix. While we acknowledge the intent to provide national consistency, the proposed approach presents several implementation challenges for our district.

Our current natural hazard information, such as our coastal flood data, provides frequency and spatial extent of hazard events but does not include assessments of "potential for injury or fatalities." Consequently, while we can identify the likelihood of events, we cannot fully establish the "consequence level" as required by the proposed matrix. This information gap means we cannot definitively determine whether developments face "significant risk" under the proposed definition.

The proposed matrix would require applicants for discretionary or non-complying resource consents in affected areas to provide comprehensive risk assessments including consequence analysis. Policy 6 directs councils to "continue with risk assessment processes" where information is incomplete, which would likely place the burden of detailed risk assessment on applicants rather than council-led processes.

Where significant risk is established, additional requirements under Policy 5 (managing risk exacerbation to other sites) and Policy 3 (proportionate risk management) would apply. This layered approach could substantially increase both the cost and timeframe of resource consent processes.

While we acknowledge these provisions are interim in nature, they would have immediate effect with our current natural hazard information. This creates potential friction with applicants who must establish significant risk levels that Council cannot readily verify or advise upon with existing data. The inability to provide clear guidance to applicants and the public regarding risk levels presents significant implementation challenges for our district.

The consequence levels required by the matrix are not well-aligned with Policy 1's assessment requirements. Natural hazard information is often received from regional councils, external assessors, or consultants, and is subject to various legislative frameworks including the Local Government Official Information and Meetings Act and Building Act. These assessments may not contain all requirements outlined in Policy 1, particularly consequence-level analysis including injury or fatality risk.

This disconnect could complicate future planning processes, particularly where new natural hazard assessments are received that do not meet Policy 1 requirements for establishing consequence levels needed in the planning process.

Recommendation

The Government should establish minimum standards for natural hazard information across all relevant legislation to ensure local government processes operate effectively. Such standards would address the potential disconnect between hazard reporting and planning requirements, facilitating smoother implementation of national direction while maintaining the integrity of risk-based decision making.

Proportionate management

78. Should the risks of natural hazards to new subdivision, land use and development be managed proportionately to the level of natural hazard risk?

Yes with changes

The policy is not explicit regarding the types of activities or mitigation measures required to comply with proportionate management. The consultation document acknowledges this gap, stating "This policy can be

elaborated on through supporting guidance documents." However, previous case law has established that decision makers cannot rely on Central Government guidance documents as part of decision-making processes under the current RMA framework.

If decision makers must rely solely on the policy as written, this could create a vast range of implementation outcomes across different councils and consent authorities. This variability undermines the NPS's objective of providing national consistency in natural hazard management.

The likely result is that case law will be required to create and fill in the necessary detail for consistent and fair decisions to comply with this policy. This approach would lead to variable implementation across the country as different cases establish precedents, creating uncertainty for both councils and applicants during the interim period while case law develops.

Instead, Central Government could explicitly outline how proportionate consideration should occur within the policy itself, providing decision makers with clear direction that does not rely on external guidance documents. This would ensure more consistent implementation from the outset and reduce the need for costly litigation to establish precedents.

An additional concern with the proportionate approach is its interaction with insurance availability for properties identified in natural hazard-prone areas. If insurance companies continue to take a precautionary approach towards coverage, there may be a substantial retreat of insurance providers from risk-prone areas. This could create significant issues for constituents to either obtain replacement insurance for their property or proceed with sales to move to properties that can be insured.

A proportionate approach may permit development in hazard-prone areas that the market later determines is too risky to support. This creates a moral hazard issue where Council is blamed for allowing development to occur, despite operating within the planning framework that required such activities to be permitted under a proportionate risk management approach.

Where property owners lose access to private insurance, they can apply for coverage through the Natural Hazard Commission. However, one of the main reasons for claim decline through the Commission is the establishment of a section 72 notice on the property. The Natural Hazard Commission website states: "A section 72 notice on a property's record of title may result in us fully or partly declining your claim. This notice can be placed on a property that is known to be affected by or at risk of a natural hazard. It is intended to make anyone with an interest in the property (such as potential buyers, banks, lenders and insurers) aware of the risk, as well as specifying what that hazard is."

Through a 'proportionate' approach, activities could still proceed through the planning framework, where it is likely a process such as a section 72 notice would subsequently be placed on the property. This could leave the Natural Hazard Commission as the only insurance option, with potential for declined claims resulting in substantial wealth loss for constituents.

This framework creates a lose-lose scenario where councils could suffer significant reputational damage. Councils would be implementing national direction requiring proportionate management, yet could be held responsible by constituents for allowing development that later proves uninsurable or results in declined insurance claims. This places councils in an untenable position between implementing national policy requirements and managing community expectations regarding development risk.

79. How will the proposed proportionate management approach make a difference in terms of existing practice?

Southland District Council Submission on Proposed Changes to NPS-NH

The proportionate management approach would alter Southland District Council's current natural hazard management practices, requiring operational and procedural changes.

Currently, Southland District Council takes a limited approach to natural hazard management. At the time of subdivision, decision makers seek input from internal staff for applications in identified natural hazard areas, typically applying standard conditions such as minimum floor levels.

The proportionate approach would require both applicants and Council to establish consequence levels for each application. Where developments are deemed to present significant risk, comprehensive assessment of consent conditions would be necessary. Council staff would need to determine whether proposed mitigating works are commensurate with the identified risk level, adding new assessment processes to resource consent reviews.

The number and complexity of consent conditions would likely expand, as higher risk levels would necessitate more extensive mitigation requirements. This may result in increased resource consent rejections where adequate mitigation cannot be achieved.

A particular implementation challenge arises from the exemption of primary production activities. Subdivisions in our district often list primary production as the intended activity, potentially creating incentives for applicants to structure applications to avoid natural hazard assessment requirements, thereby undermining the policy's effectiveness.

Council currently seeks input from the regional council to establish risk levels and required mitigation steps for specific applications. The proportionate management approach may require Council to develop these capabilities internally rather than relying on regional council expertise. This would necessitate hiring specialist staff to assist with appropriate risk and proportionate management determinations.

Implementation would require comprehensive staff upskilling and training processes to ensure consents continue to be processed within statutory timeframes. Our current team is uncertain about what outcomes a proportionate management approach would mean for existing processes, creating additional preparation challenges.

There would be substantial costs associated with preparing for the NPS-NH implementation date, including training programs, procedure development, and system modifications. These preparation costs represent a significant immediate burden beyond the ongoing operational changes required.

These changes would increase both the cost and processing time for resource consents requiring natural hazard consideration. The level of development restrictions may also increase across our district as more comprehensive risk assessment identifies previously unrecognized hazards or higher risk levels than currently applied.

The proposed approach represents a departure from current practice and would require significant new resources to successfully implement the requirements of the proposed NPS-NH. The operational changes extend beyond simple policy adjustments to fundamental alterations in assessment methodology, staffing requirements, inter-agency coordination, and staff capability development.

Use the best available information

80. Should the proposed NPS-NH direct local authorities to use the best available information in planning and resource consent decision-making?

No.

While Southland District Council acknowledges the importance of robust information in natural hazard risk management, the implementation of "best available information" requirements would create significant operational challenges for our district.

Southland District Council Submission on Proposed Changes to NPS-NH

The requirement to use best available information would create a scenario where Southland District Council must incorporate natural hazard information known to Council that has not been processed through formal planning procedures. This would result in several implementation issues that we consider onerous and potentially inequitable.

Due to our current District Plan's permissive approach in areas subject to natural hazards or that could be identified in the future, several activities under permitted, controlled, and restricted discretionary activity status would continue to develop in areas where Council is aware of hazard risk, but this risk is not reflected in the District Plan provisions.

Subsequently, discretionary activities would be required to consider this 'non-plan' hazard information and undertake full assessments with all the implementation challenges we have outlined elsewhere in this submission. This could result in a patchy, inconsistent approach across Southland District that creates significant friction with the community and variable implementation outcomes.

Applicants may not be aware of natural hazard information held by Council, potentially being "ambushed" at the time of resource consent application with requirements to comply with natural hazard assessments and mitigation measures. This places a substantial burden on Council to educate and communicate planning requirements that may only marginally improve hazard management outcomes.

This creates a significant implementation hurdle for Council staff in giving effect to the NPS while generating friction with the community. The disconnect between different activity statuses facing different levels of natural hazard consideration undermines the principle of fair and consistent treatment of similar developments.

Many of our constituents believe Central Government is removing restrictions on their land and making development easier. When faced with continued or additional restrictions through natural hazard requirements, they blame Council, creating reputational loss that is outside of Council's control.

Recommendation

Our recommendation is that the NPS have a delayed implementation effect to align with Phase 3 of the RMA reform. This would allow for a comprehensive refresh of the planning system to fully consider all natural hazard information available to date, ensuring a fair and consistent process for all applicants in Southland District rather than the current piecemeal approach that would result from immediate implementation.

81. What challenges, if any, would this approach generate?

As indicated above, difficulties in assessing natural hazard risks are likely to result in extra costs to applicants and may lead to increased processing time and frustration. It will be difficult to achieve the objectives of the NPS-NH without good quality, up to date information about natural hazards.

Central government should providing resource and support to generate information about natural hazards for the whole country – including predominantly rural and/or sparsely populated areas such as the Southland district.

Implementation

82. What additional support or guidance is needed to implement the proposed NPS-NH?

Central government resource and support to generate localized information about natural hazards.

Guidance regarding multi-hazard risk assessment and use of climate scenarios.

83. Should the NZCPS prevail over the proposed NPS-NH?

Yes. However, the interaction between the two instruments could be problematic and result in implementation difficulties. This needs to be further considered and addressed.

Section 4: Implementation of infrastructure and development instruments

Implementation questions

84. Does 'as soon as practicable' provide enough flexibility for implementing this suite of new national policy statements and amendments?

Yes.

However, some instruments need to be implemented through plan changes as soon as possible in order to achieve their objectives – for example, the NPS-NH. The absence of a deadline for implementation and the announcement of the impending "Plan-Stop" legislative amendment, leaves councils in an ambiguous position regarding plan changes.

85. Is providing a maximum time period for plan changes to fully implement national policy statements to be notified sufficient? a. If not, what would be better, and why? b. If yes, what time period would be reasonable (eg, five years), and why?

No, it is not in the context of the recently announced Plan Stop legislative amendment. If the Central government seeks the earliest possible application of the natural hazard matters, then it should apply either a directed plan change from the Minister or a national enviro0nmental statement for natural hazards with immediate enactment.

86. Is it reasonable to require all plan changes to fully implement a national policy statement before or at plan review?

87. Are there other statutory or non-statutory implementation provisions that should be considered?

A National Environmental Standard would better achieve the objective of the NPS-NH as it does not depend on implementation through a plan change.

Southland District Council Submission on Proposed Changes to NES-REG

National Policy Statement for Renewable Electricity Generation

Executive Summary

Southland District Council supports the Government's intent to strengthen the National Policy Statement for Renewable Electricity Generation to achieve climate and electrification targets. However, we have significant concerns about ensuring adequate protection for local communities and Outstanding Natural Features and Landscapes in our region.

Key Messages:

1. **Community Benefits Must Be Prioritised:** REG projects must deliver tangible benefits to local communities, not just regional or national benefits. Communities hosting these projects should receive direct energy allocations and community improvement funds.
2. **Outstanding Natural Landscapes Remain a Constraint:** Southland's potential wind farm sites often overlap with areas identified as Outstanding Natural Features and Landscapes. The tension between REG development and landscape protection remains unresolved and will continue to be a primary limiting factor.
3. **Support for Existing REG Protection**: We strongly support measures to protect and enable existing renewable electricity generation assets.
4. **Community-Led Development Model:** The Rakiura/Stewart Island solar project demonstrates the effectiveness of community engagement and direct local benefits in achieving renewable energy goals.

Bottom Line Recommendation: Amend Policy A to explicitly require that REG projects demonstrate local community benefit through energy allocation and community improvement measures, while maintaining strong protection for Outstanding Natural Features and Landscapes until Phase 3 RMA reform clarifies this framework.

Detailed Submission

Question 11: Do you support the proposed amendments to the objective of the NPS-REG?

Response: We agree with the benefits of increasing renewable energy generation in New Zealand. These amendments will, in our opinion, result in more renewable energy generation in our District, and as a result we believe our submission should be given weight due to our District's significant renewable energy potential.

We support the strengthened objective that better recognizes the critical role REG plays in achieving New Zealand's emissions reduction and energy targets under the Climate Change Response Act 2002. However, we believe the objective should be amended to specifically reference "local communities" to ensure that while the wider benefit to New Zealand of renewable energy infrastructure is significant, it does not completely override the impacts and benefits to the local communities where it is developed.

This inclusion would promote a more balanced approach where companies or ventures would need to adequately consider local communities hosting these developments. The objective should ensure that the substantial national benefits are weighed appropriately against local community impacts and that local communities receive commensurate benefits from hosting nationally significant renewable energy infrastructure.

Recommendation: Support the proposed amendments to the objective with the addition of specific reference to "local communities" to ensure balanced consideration of national benefits against local impacts and to require adequate consideration of local community benefits.

Question 12: Are the additional benefits of renewable electricity generation helpful considerations for decision-makers? Why or why not?

Response: The additional benefits listed are helpful, but we recommend strengthening the policy to emphasize local community benefits. While the benefits of maintaining and upgrading existing assets and locating REG close to demand and electricity networks are valuable, the policy should be more explicit about ensuring local communities hosting REG projects receive direct benefits.

Recommendation: Support the additional benefits but amend to include explicit local community benefit requirements in the benefits list.

Question 13: Does the proposed policy sufficiently provide for the operational and functional need of renewable electricity generation to be located in particular environments?

Response: We agree with the changes to encourage infrastructure and new energy initiatives, but have significant concerns about ensuring local community benefit. Southland is uniquely positioned to provide renewable energy generation to the South Island, but communities often see little direct benefit from projects in their areas.

Policy A should be amended to ensure the well-being of local communities is emphasized. REG projects often highlight temporary or regionalized employment benefits that provide no lasting advantage to the immediate community. These benefits are often sold to local communities without demonstrating larger benefits for the activity occurring in their area. If renewable energy is being generated in the local community, a portion of that energy should be set aside for those local community members and they should see a benefit for that.

Often these projects have aesthetic and perceptive impacts on communities. These projects should be required to provide improvements to mitigate those losses to the community through funds or offsetting via beautification of other parts of their community. These improvements would stop or lessen local community concerns about the impact of these projects.

The Rakiura/Stewart Island solar project exemplifies effective community engagement. The project received $15.35 million in funding from the Regional Infrastructure Fund and is expected to reduce diesel consumption by 200,000 litres within two years, providing considerable savings for residents. This project was done in collaboration with the local community where they could see the benefit to the island, which reduced friction around renewable energy development. The council met with about 80 islanders who supported the planned approach and showed strong engagement.

Recommendation: Support the proposed policy but amend Policy A to explicitly require REG projects to demonstrate local community benefit through energy allocation and community improvement measures, following the successful Rakiura/Stewart Island model.

Question 14: Do the proposed new and amended policies adequately provide for existing renewable electricity generation to continue to operate?

Response: We strongly support the changes to protect established renewable electricity generation. The new policies requiring decision-makers to enable the continued operation and maintenance of existing REG assets are essential. The policy direction for re-consenting, upgrading and repowering existing REG assets is particularly valuable, especially the focus on considering only additional or different effects and providing flexibility for technological upgrades.

The strengthened protection against reverse sensitivity effects is crucial for maintaining existing generation capacity. These policies appropriately recognize the importance of existing assets in meeting New Zealand's climate targets.

Recommendation: Fully support the proposed new and amended policies for existing REG assets.

Question 15: Do the proposed policy changes sufficiently provide for Māori interests in renewable electricity generation?

Response: No comment.

Recommendation: No comment.

Question 16: Do you support the proposed policy to enable renewable electricity generation development in areas not protected by section 6 of the RMA, or covered by other national direction?

Response: We have significant concerns with this proposal. Several areas in Southland that would be eligible or ideal locations for wind farms (the predominant REG option utilized in our region) are subject to candidacy for Outstanding Natural Features and Landscapes. From our understanding, Central Government is still intending to incorporate Outstanding Natural Features and Landscapes into Phase 3 of RMA reform under the Natural Environment Act.

The Slopedown Wind Farm case exemplifies our concerns. Part of the wind farm site was identified as an "outstanding natural landscape candidate" in a report commissioned by four Southland councils in 2018 and finalized in 2019. The $1 billion Southland wind farm was rejected by an independent consenting panel, with the panel stating it was not satisfied adverse effects on significant indigenous vegetation and the habitats of indigenous species could be properly mitigated.

The project faced opposition from the West Catlins Preservation Society, with members stating that the project would visually impact the area and affect the environment and wildlife. The West Catlins Preservation Society argued that the proposed wind farm would be visible from vast areas of Southland and Otago, setting a dangerous precedent for other iconic landmarks to be populated with wind turbines.

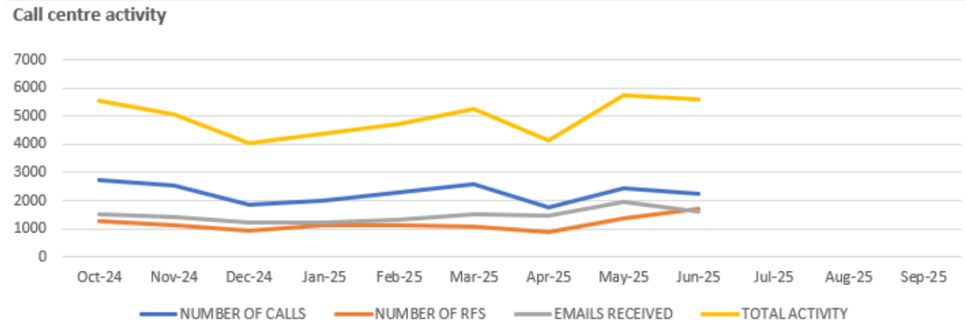
With Section 6 considerations and due to the physical size and scope of these projects, there is often significant modification of landscapes. While these proposals may encourage or enable REG activities, Section 6 considerations will continue to be the primary limiter of these activities in Southland until the Outstanding Natural Features and Landscapes framework is clarified.

Recommendation: Do not support the proposed policy until the Outstanding Natural Features and Landscapes framework is clarified in Phase 3 RMA reform. The tension between REG development and landscape protection must be resolved at a national level before enabling renewable energy generation in currently unprotected areas.

Activity summary report June 2025 – customer services and libraries team

Contact centre overview

CALL CENTRE ACTIVITY							
MONTH	NUMBER OF CALLS	AVERAGE WAIT TIME (seconds)	AVERAGE CALL LENGTH (minutes)	NUMBER OF RFS	EMAILS RECEIVED	ANTENNO REQUESTS	TOTAL ACTIVITY
Feb-25	2275	46	2.31	1120	1295	54	4744
Mar-25	2610	31	2.25	1077	1534	55	5276
Apr-25	1758	38	2.27	900	1453	41	4152
May-25	2427	41	2.21	1357	1995	35	5774
June-25	2260	49	2.25	1694	1627	37	5618



TRACKING THREE MONTH TOP FIVE RFS CATEGORIES		
April 2025	Building - general enquiries	121
	Online customer change of name/address	85
	Dog registration change	66
	Online user registration	41
	Resource management general enquiries	41
May 2025	Dog registration change	179
	Building - general enquiries	140
	Online customer change of name/address	105
	Online user registration	54
	Resource management general enquiries	50
June 2025	Dog registration change	480
	Online customer change of name/address	101
	(Online only) dog registration new	98
	Building - general enquiries	95
	Online user registration	62

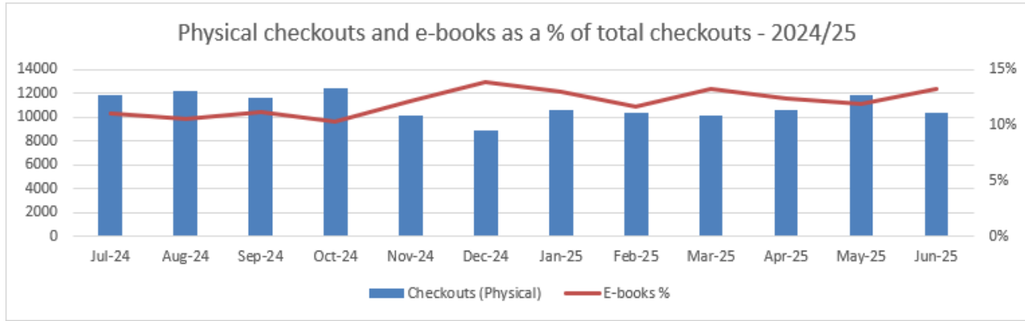
May/June customer service insights

- The CSP (Customer Support Partners) team has been actively supporting a high volume of customer engagement across multiple channels, with a noticeable increase in activity during May and June due to dog registration season. Following the distribution of the dog registration pre renewal letters, the team experienced a spike in dog related enquiries and change requests, as shown in the jump in interaction numbers in the above data.
- Average wait and call times remained consistent, demonstrating the team's ability to maintain service quality during peak periods.

District library overview

KPI 5.1: the library network will increase the digital proportion of lending year on year
KPI 5.2: the library and service network will increase programme participation numbers year on year

DISTRICT LIBRARY STATS						
	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
PROGRAMME PARTICIPANTS	88	515	784	412	736	671
CHECKOUTS (PHYSICAL)	10,643	10,425	10,156	10,598	11,843	10,372
BORROWERS (PHYSICAL)	1,480	1,449	1,501	1,535	1,540	1,434
E-BOOK CHECKOUTS	1,596	1,372	1,439	1,495	1,606	1,583
PRESSREADER (NEWSPAPERS)	3,170	3,028	3,190	3,136	3,076	3,134
E-BOOKS PROPORTION (%)	13%	12%	13%	12%	12%	13%



SOUTHLAND DISTRICT COUNCIL PROGRAMME PARTICIPATION MAY/JUNE 2025							
	Lumsden	Otautau	Riverton	Te Anau	Winton	Wyndham	TOTAL
Brick club	37	11	70	179	30	42	369
Story time				349	212		561
Wriggle and rhyme				13	144		157
Kids craft				96			96
Other library clubs	32		38	45	11		126
Holiday programme	13						13
Community events							0
TOTAL	**82**	**11**	**108**	**682**	**397**	**42**	**1322**
May/Jun 2024 total	77	17	177	422	360	78	1131
May/Jun 2023 total	17	22	113	251	408	52	863

KPI tracking	July 2022 – June 2023	July 2023 – June 2024	July 2024 – June 2025
KPI 5.1 e-books proportion	n/a	10%	12%
KPI 5.2 programme participation	3889	5104	6879

May/June libraries insights

- the Community Impact Survey results have been shared with library regions, focusing on four key areas: social, economic, cultural, and environmental. The survey provides evidence based insights into how libraries support their communities. Southland libraries showed strong results, with 90.7% of respondents saying that the library encouraged their love of reading, and 87% reporting improved wellbeing. For the full report, please contact the library team.
- Winton library successfully recruited for a mobile librarian/customer service partner. This staff member is local to the northern Southland area and brings an extensive background in customer service.
- an increase in circulation numbers was noted in May, before settling into the typical winter decrease in June. This was reflected in the e- resource checkouts that have increased as borrowers chose to take advantage of electronic options, rather than braving the cold conditions to venture out to libraries.
- winter also affects children's visits to the library; it is not so easy for the preschools and schools to get out and about. To keep engagement up, the library teams in Winton and Te Anau have complemented inhouse library programmes by delivering story time sessions at local Early Childhood Education centres and schools. As well as welcoming new parents to the wriggle and rhyme programme held in the community Plunket rooms.

Monthly activity summary report June 2025 – community facilities

Previous month's achievements

- all but one vacancy within the team has been filled.
- staff have prepared a report to Council for the renewal of the mowing, gardening and cleanings contract prior to going to market in September
- the reserve management plan review contract has been awarded to the successful tenderer and is underway with the dissemination of data
- an update report to Council has been prepared.

Priorities for upcoming month

Projects to be started:

- reserve management plan review
- continue to get projects out to the market
- staff recruitment and onboarding
- work with project delivery team to prepare works programme for the 2025/2026 year
- Ulva Island wharf report seeking recommendation from the community board.
- Various reports for end of financial year and the next round of community board reporting.

Contract(s) performance

- we are now seeing a slowdown in growth with a change in weather conditions, as we are now in winter. Grass maintenance is as per the agreed levels of service
- township gardening contractors are focusing on preparing the gardens leading into winter
- the work done through the Alliance contracts is cyclic and any additional requirements are requested by the contract managers
- the toilet and office cleaning contracts are all running as per the required level of service.

RFS summary

CUSTOMER SERVICE		
Requests for service	**May/June 2025**	**YTD**
General requests for service (RFS)	149	572
Service requests completed on time	146	557
Service requests completed on time %	98%	98%

- response times for RFS are how we measure our KPIs. We are required to complete 80% of the RFS within the allocated timeframes. We are exceeding this both for the month and for the YTD

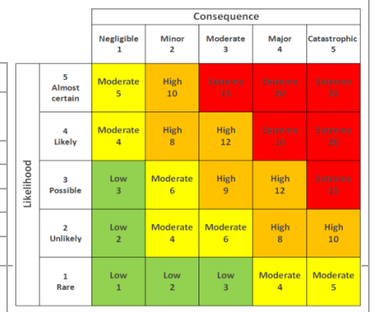
KPI summary

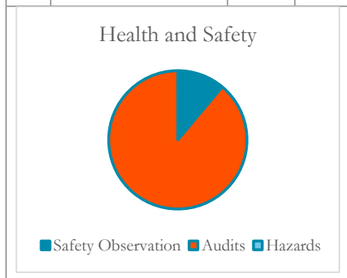
- KPI's (these are reported to Council quarterly, end of February figures were reported to Finance and Assurance committee on 14 May 2025)
- 2.1 Council owned halls are fit for purpose (halls are clean, booking is easy, customer would book again)
- 6.1 all SDC playgrounds will meet NZ Standards over the next three years
- 6.2 open spaces requests for service are completed within specified timeframes (currently sitting at 91%)
- 6.3 Council collaborates in partnership with a minimum of three community groups in the biodiversity/ecological or environmental space (we are in the process of working with a new group in Te Anau, this is in addition to the MOU's that are currently in place)
- 13.1 water facilities requests for services are completed within specified timeframes (currently sitting at 92%).

Risks and hotspots

SDC WORKS PROGRAMME KEY RISKS		
Likelihood / Impact (Likelihood x Impact = Risk Score)		
Red	(15-25)	Extreme
Orange	(8-12)	High
Yellow	(4-6)	Moderate
Green	(1-3)	Low

			RISK FACTORS Post mitigation			
Ref No	**Works programme risks**	**Likelihood**	**Impact**	**Risk Score**	**Mitigation actions**
1	Supply and resourcing issues	3	4	12	Material supplies, delivery timeframes and a shortage of materials are causing delays to project delivery.
2	Works programme for 2024/2025 not meeting targets	4	3	12	2024/2025 programme work continues. Increases in project pricing and contractor availability is concerning.
3	Health and safety	2	3	6	All projects have updated health and safety plans - all contractors and suppliers have been compliant with the regulations and checks are being undertaken and new risk management framework is being developed.
4	Budgets and cost control	4	3	12	Cost increases are putting pressure on project budgets. Rescoping may be required where contingency values are insufficient. Scope creep affecting project values and delivery timeframes. Will be mitigated with community board and Council project alignment strategy.
5	Resources	3	3	9	The vacancies within the team are being filled. There is now only one position that needs to be filled to bring the team up to full capacity.





Health and safety/ environmental / quality

There was one safety observation, and eight audits completed over this period. There have been no major incidents reported for the month.

Strategic planning priorities

- asset management improvement works (are ongoing but working towards the Strategic Asset Management Plan and Long-Term Plan timelines)
- Reserve Management Plan omnibus review
- investigate options to increase the level of community led projects
- start the preparation work for the renewal of the mowing, gardening and toilet cleaning contracts that will commence in July 2026.

ITEM	ACTUAL (YTD)	PROJECTION (YTD)	VARIANCE
Operating Expenditure			
Community Housing	570,837	649,465	78,628
Halls	425,917	578,708	152,791
Offices & Buildings	4,644,266	4,773,561	129,295
Open Spaces	3,031,539	4,061,784	1,030,245
Toilets	1,345,362	1,483,008	137,646
Water Facilities	145,914	225,980	80,066

*Note: all figures exclude vested assets and depreciation in order to show the operational result

Community facilities budgets (to the end of June 2025)

- community housing operational expenditure is under projection by $78,628 (12%). Operational expenditure fluctuates in this area as general maintenance is reactive and sometimes dependant on the availability of access to the units. If the tenants remain static the operational costs generally remain low
- hall operational expenditure overall is under projection by $152,791 (26%). This is largely due to the painting project at Manapouri hall having been put on hold due to asbestos being found at the hall. The asbestos issue has been resolved; however the painting has been rescheduled for the new painting season which is in the next financial year. The Winton RSA interior refurbishment is back to scoping after tenders came in over budget so this has not been started and will be carried forward into 2025/2026. The operational budget for halls is to cover any minor maintenance that is required throughout the year, fly and spider control, external wash down and spouting cleaning
- offices and buildings operational expenditure is under projection by $129,295 (3%) largely due to corporate overheads being lower
- open spaces operational expenditure is under projection by $1,030,245 (25%). A proportion ($270,124) is for the Te Anau Lake front project that has been completed but classified as capital expenditure. The removal of trees at Drummond was completed under budget and the Kruger Street subdivision has incurred minimal costs to date and will be carried forward. A portion is a grant to the Tuatapere Railway Station Trust that will be carried forward into next year as the trust continues work. Tree and hedge work throughout the district is underway, however won't be completed by 30 June and some of the remaining budget will be carried forward. There is an underspend of $44,143 at Curio Bay which relates to the delivery of water that has not been required due to seasonal weather variations. General maintenance overall was also under budget, this budget is largely reactive.
- toilet operation operational expenditure is under projection by $137,646 (9%) this is mainly due to four maintenance projects that are underway. It is anticipated that this work will come in under budget. The remainder of these budgets will be carried forward
- operational expenditure for boat ramps is under projection by $3,850 (11%) due to less general maintenance required throughout the year.
- operational expenditure for the Riverton harbour is under projection by $23,395 (47%) under budget and is due to maintenance that needs to be undertaken on the Long Wharf and the navigation lights as well as less interest on loans due to the budgeted loan not being drawn down.
- operational expenditure for Stewart Island jetties is under projection by $52,822 (38%). This largely relates to the Millers Beach project that is in procurement.

Activity summary report June 2025– resource planning

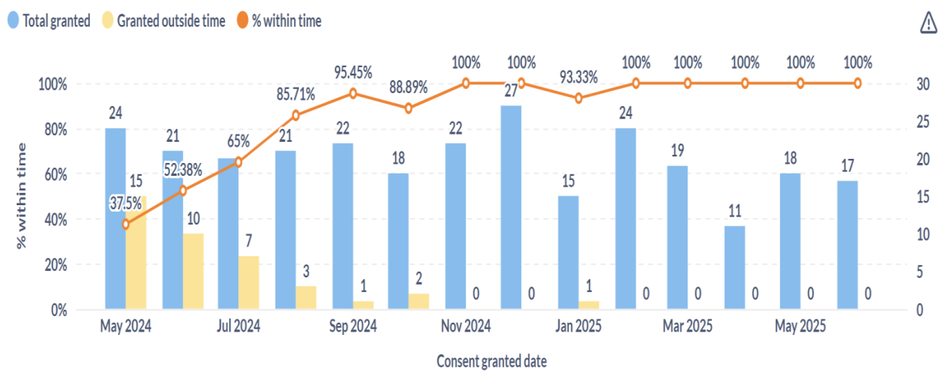
Processing of consents

- table shows the number of consents that have been lodged from 1 May to 30 June 2025
- of the ones lodged, it shows how many have already been completed
- the past two years (2023 and 2024) are given to show comparison.

CONSENT APPLICATIONS LODGED AND COMPLETED MAY/JUNE	2023	2024	2025
Applications lodged	78	37	53
Applications completed	75	37	34
Granted/ issued	67	34	32
Incomplete (s88) returned	5	1	1
Cancelled/ withdrawn	3	1	1
Surrendered		1	

DECISIONS MADE BETWEEN 1 MAY – 1 JUNE 2025 AND YEAR ORIGINAL APPLICATION RECEIVED					
APPLICATION YEAR	GRANTED	INCOMPLETE	ISSUED	WITHDRAWN	TOTALS
2021				1	1
2024	1				1
2025	32	2	4		38
Totals	33	2	4	1	40

RMA applications meeting statutory timeframes



The team has completed a fifth consecutive month of completing consents within statutory timeframes, with only one consent missing timeframes since November 2024. This is a massive improvement from the 37.5% in May 2024.

Reliance on external contractors is minimal with four applications with them for processing. Currently, internally 38 consents are in process and another 12 are either awaiting payment or in the process of being assigned to planners for processing.

Requests for service

tables show

- the number of RFS that have been lodged and completed from 1 May to 30 June 2025
- the past two years (2023 and 2024) are given to show comparison
- how many were completed within timeframe.

1 MAY TO 30 JUNE	2023	2024	2025
Lodged	268	177	127
Completed	268	177	127

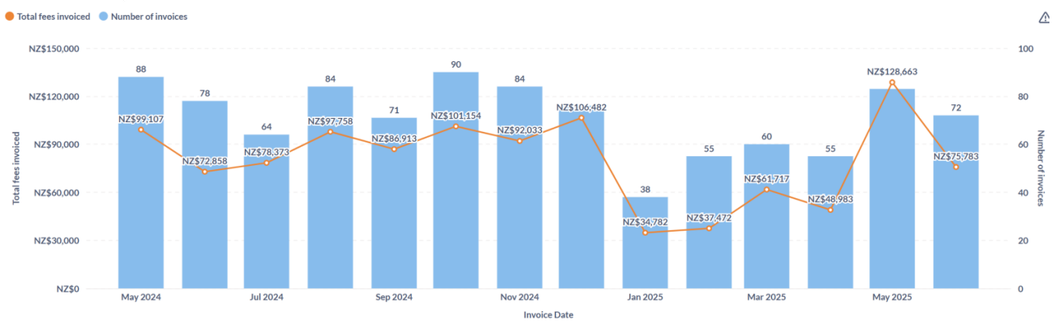
RFS COMPLETION TIME STATUS FROM 1 MAY TO 31 JUNE 2025				
YEAR	OUTSIDE SERVICE LEVEL	NOT YET COMPLETED	WITHIN SERVICE LEVEL	TOTAL
2023	47		221	268
2024	8		169	177
2025	1	1	125	127

Invoices for resource consents to end June 2025

- table shows the number of invoices issued by month and the invoiced amounts
- planning allows a 30-day buffer for applications processed by external contractors allowing time for the arrival of all information and invoices to be on-charged
- for in-house processing, the buffer is only 10 days unless we have engaged with external specialists.

MONTH ISSUED	NUMBER ISSUED	$
May	83	128,663
June	72	75,783
Total	**155**	**204,446**
Total 2024/2025 financial year	**832**	**950,113**

RM invoices by month



General points

The resource consents manager started 12 May and CoLab has officially finished with us. The team is settled and dealing with the workloads effectively, with another two months of consents meeting statutory timeframes. Recruitment for the intermediate position was successful, and the new planner started with us on 11 August 2025. The team is busy with a number of complex consents, applications that will be going through the fast-track process and preparing for a hearing.

Activity summary report June 2025 – environmental health and compliance

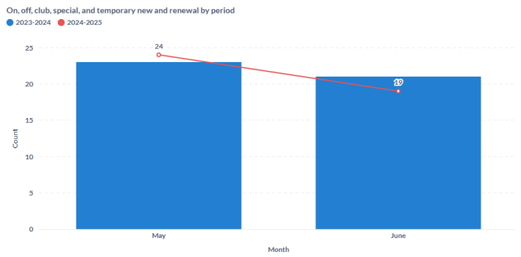
Manager's report

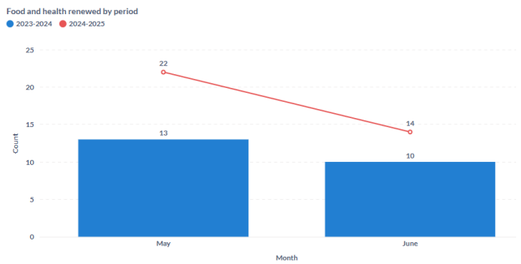
Alcohol, food and health licences

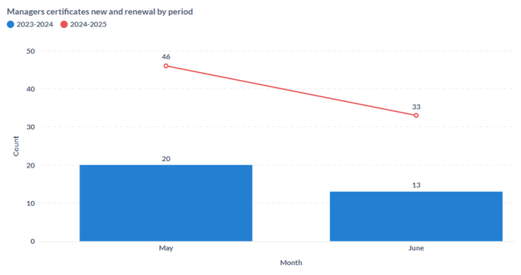
- there were 22 food verifications completed in May and June, with acceptable outcomes
- alcohol counts are about the same as the previous year for on, off, club, special temporary authority (TA) for new and renewals. Managers certificate numbers were significantly higher for the same period – 78 new and renewal applications have been received
- request for service enquiries for environmental health was lower for May and just higher for June – this could be attributed to the website updates
- the MPI Food Levy has been successfully integrated into our workflow and is functioning effectively.

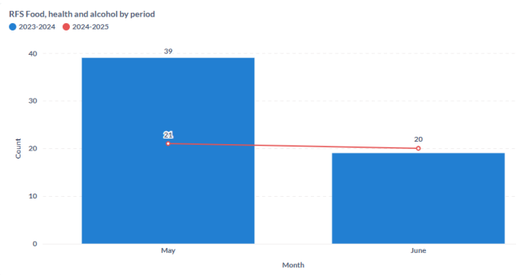
Next month's focus

- The revocation of hairdresser regulations on 31 July 2025 is expected to ease administrative and inspection requirements. While this may lead to a greater reliance on complaint-based enforcement, the overall risk to public health is considered manageable. Supporting businesses through clear communication and guidance on relevant planning and building requirements will help ensure a smooth transition
- the annual Alcohol Regulatory Licensing Authority (ARLA) report to Council.









Compliance report

Animal control has had a busy couple of months. We are dealing with two new dog attacks - the final outcomes are not yet determined

A Council hearing was held regarding a menacing classification. Council decided to uphold the classification on the evidence presented.

We are currently contacting all owners of unregistered dogs. Those who have no valid reason for the dog remaining unregistered eg the dog is dead or out of district, have been issued a second $300 infringement. We now have seven unregistered dogs unaccounted for.

DOG INFRINGEMENTS				
	30/6/24	30/6/25	Annual infringement totals	
			2023/2024	2024/2025
Infringements issued as at date	150	182	$44,600	$54,300

TYPE OF INFRINGEMENTS ISSUED IN 2024/25	
Type of infringement	**Number**
s42 Failure to register dog	126
s52A Failure to keep dog controlled or confined	48
Failure to keep dog under control	2
Failure to comply - barking dog abatement notice	3
Failure to comply with bylaw	3

Freedom camping has been relatively quiet this year.

RMA monitoring and compliance has continued to be busy. All three hundred legacy resource consents requiring monitoring have been processed in the last six months. This has resulted in approximately 80 which require additional effort. This is on top of the normal workload relating to new consents and complaints.

Stock

We are reviewing the safety elements of removing stock from roads, this is a difficult issue as the number of variables encountered. Staff safety is always a priority. The goat issues have been quiet recently.

Bylaws

The team continues to support the governance team with the review of the Dog and Freedom Camping Bylaws.

General points

The team continues to assist with compliance matters relating to the misuse of reserves and obstructing of private roads (this is covered by the Local Government Act 1974). The team endeavours to support the organisation in areas where they have some expertise.

Activity summary report June 2025 – building solutions team

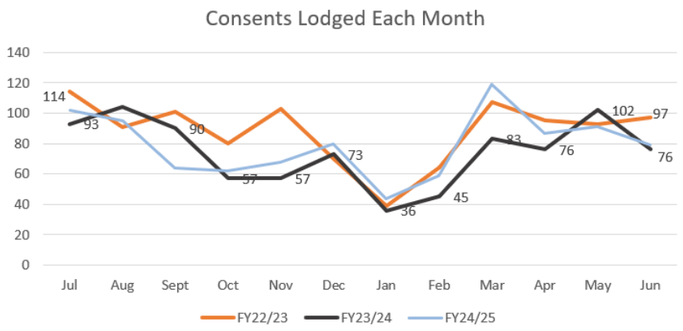
Progress report – building control team

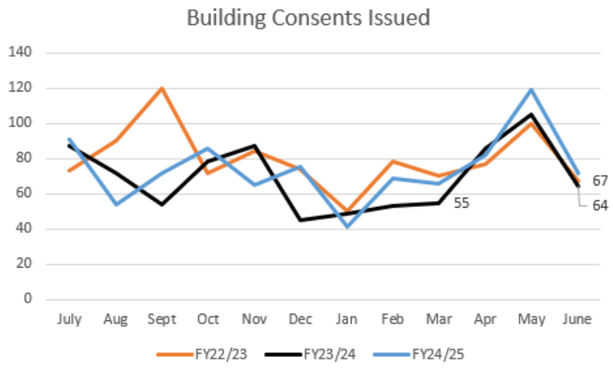
Compliance to statutory timeframes for building consent processing has steadily increased over the last financial year and was at 95% on average. May-June processing time frames continues to be high at 97% compliance to timeframe with average days to grant at 12.5.

Compliance to statutory timeframes for Code Compliance Certificates was at 96% average for the financial year and continued to be high at 98% for May-June.

The number of building consents applied for during May was down10% from the previous year, but were up 3% for June.

Two major projects for the Fonterra site at Edendale had building consents granted in June.

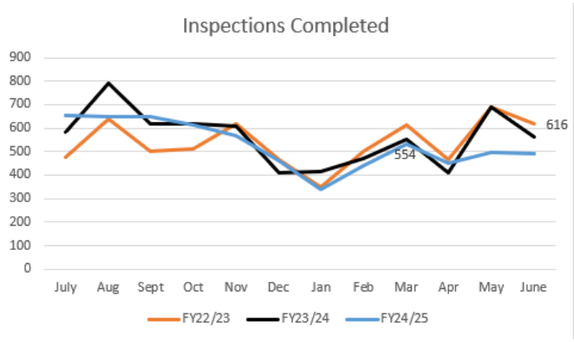


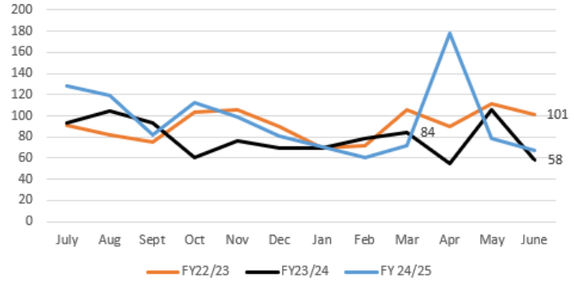


Progress report – building quality assurance team

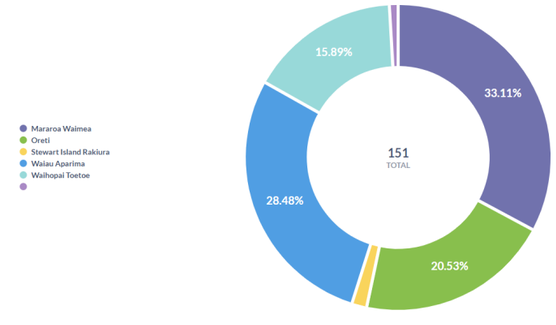
The team continues to complete all required audits and proactively identify opportunities for continuous improvement where gaps are identified within existing systems and processes.

The current GoGet system, used to support BCA functions, has reached end of life. We are working closely with the IT department to ensure the selection and implementation of a suitable replacement system that is robust and capable of integrating effectively with Council's existing data and document management platforms. A decision on the preferred replacement system will need to be made in the near future to ensure continuity of service.





Building consents by Ward: May–June 2025



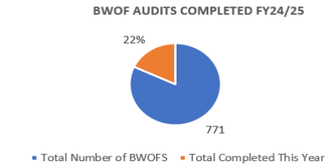
Progress report – building compliance team

BWOF audits continued during June with a large amount completed over May and June, we have now met our KPI of 22% BWOF audits for the year (yearly target is 20%). Outstanding follow up from the inspections is being completed with inspections for the new year to begin mid-July.

We continue to have a number of outstanding RFS that we are slowly working through the investigations required, these are time consuming, we continue to work with the owners to gain compliance before any enforcement action is taken. Where we continue to see non-compliance and Notices to Fix being issued, where the Notice to Fix has not been complied with we are issuing infringements in these cases, if after the infringement has been issued and a further Notice to Fix issued with no compliance being meet, legal advice is being sought on further enforcement action that could be taken in relation to a prosecution.

Dangerous, Insanitary and affected buildings are included in the RFS that we are receiving, with the relevant notice being issued as required.

Inspections will continue in July on potentially Earthquake Prone Buildings, while the initial inspection is completed there is also a large amount of time required to make a decision with the property file needing to be reviewed as well as the inspection.



165 pools on our register. 160 have been inspected.

Activity summary report July 2025 – three waters

Key achievements – previous month

- new reticulation supervisor has started at Downer. This appointment provides leadership and practicality to a critical position
- backflow preventor high-risk property survey has been completed. A number of high-risk properties will have backflow preventors installed increasing water safety
- additional reticulation resource from Downer Water Tauranga have temporarily relocated to assist in Southland until October 2025
- reservoir cleaning and condition assessment of Council's four biggest potable water reservoirs are being under in October 2025.

Priorities – upcoming month

- completing and closing out the 306 overdue work orders
- collaboratively agreeing to finalised versions of the Contract Health and Safety/ Quality Plans. Both parties are engaged in ongoing discussions around this
- delivery of the Morton Street stormwater improvement works.

RFS and quality July 2025

CUSTOMER SERVICE		
Service requests received	**July 2025**	**YTD (based off available data) Oct 2024 – July 2025**
Service requests received	66	898
Service requests cancelled	7	109
Service requests **attended** to on time	36	491
Service requests completed on time %	54.54%	54.67%
Service requests **resolved** on time	31	369
Service requests resolved on time %	46.96%	41.09%

Activity budget and expenditure to end of April

ITEM	ACTUAL (YTD)	PROJECTION	BUDGET	VARIANCE TO PROJECTION	VARIANCE %
Operating expenditure					
Water services	2,171,000	1,768,585	1,768,585	402,415	23%
Sewerage	7,000,201	6,945,341	6,800,341	54,860	1%
Stormwater	1,474,441	1,537,977	1,537,977	-63,536	-4%
Water supply	6,571,276	6,148,183	6,148,081	423,093	7%
Waste services	7,425,272	8,467,203	7,935,326	-1,041,931	-12%
Capital expenditure					
Sewerage	14,282,643	16,514,044	18,682,142	-2,231,401	-14%
Stormwater	1,011,442	2,572,767	3,214,009	-1,561,325	-61%
Water supply	3,863,385	5,413,618	3,969,236	-1,550,233	-29%
Waste services	108,666	135,302	100,000	-26,636	-20%

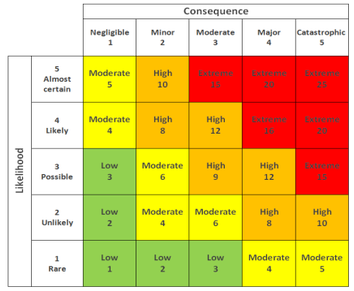
Note: all figures exclude vested assets and depreciation in order to show the operational result

Operating expenditure for Water Services is over budget due to Consultant Costs. Stormwater and Sewerage costs are in line with projection, with sewerage having higher electricity and SCADA costs offset by lower project cost for the Oxidation Pond desludging. Water Supply costs are higher than budget due to higher maintenance and SCADA costs. Waste Services is under projection mainly due to the timing of the Otautau closed landfill remediation project costs.

Capital expenditure for sewerage is below projection with delay to start in district wide pipe renewal to continue in the new financial year, the Manapouri WWTP upgrade is currently in tender phase and consent renewal projects for Winton, Balfour and Edendale/Wyndham remain on hold until the new consenting standards are in place. Stormwater capital variance mainly relates to the project in Wyndham which was awarded in August with construction to begin prior to Christmas. Water Supply capital costs are below budget mainly to the timing of the AC pipe renewal work, this started in March which is later than projected and will continue into the new financial year.

Risks and hotspots

SDC WORKS PROGRAMME KEY RISKS		
Likelihood / Impact (Likelihood x Impact = Risk Score)		
Red	(15-25)	Extreme
Orange	(8-12)	High
Yellow	(4-6)	Moderate
Green	(1-3)	Low



		RISK FACTORS Post mitigation			
Ref No	**Works programme risks**	**Likelihood**	**Impact**	**Risk Score**	**Mitigation actions**
1	23/01 O/M budget	2	3	6	SDC and Downer NZ are continuously seeking to improve our efficiencies and communications to reduce unnecessary expenditure.
2	Budget and cost control (minor capex)	2	3	6	Currently all projects within the works programme are tracking within the approved budgets, projects are reviewed monthly against budgets and project delivery team (PDT) is actively engaged with the activity managers on assisting with scoping and budget preparations with upcoming works.
3	Health and Safety	3	3	9	Late delivery of the required contractual deliverables (Zero Harm Health and Safety Plan, Contract Specific Quality Plan, Critical Spares), is currently sitting with Downer, but are in the final stages of approval following recent activity by Downer.
4	Works programme for 2025/2026 not meeting targets. Risk!	2	3	6	The 2025/2026 minor capex works to Downer has been allocated and 3 projects are in the final planning stages Four major projects are still in a holding pattern due to the unknows around the waste water standards Four projects could be considered to have risk on a late delivery 2025/2026 start being Balfour and Edendale/Wyndham WWTP, Winton and Nightcaps wastewater reconsenting/ design projects.
5	Resources and material	2	3	6	Trade resources are starting to reach capacity across the entire district but Southland District Council staff are monitoring the key suppliers and using as many local trades and companies as possible along with early engagement with contractors.

Strategic planning priorities

Closed landfill risk assessment

- Otautau closed landfill design is complete with consenting now complete, tender document development is in final draft and likely to go to the market October 2025.

WasteNet update

- the WMMP is underway, as is the initial prework for the waste collection and recycling contract due 2027
- we need to consider the implication of recent government changes to kerbside collection in regard to organic, green waste and glass collection.

Repealed water reforms: LWDW. water service plans

- LWDW water reform Water Services Delivery Plan is going to Council on 13 August 2025 for adoption, it is due to be submitted to the DIA no later than 3 September 2025.

Health and safety

- no near miss events were recorded in July
- two health and safety incidents were recorded in July
- four quality inspections/audits/principles conversations were undertaken in July by Downer
- four health and safety audits were undertaken in July by Downer.

Environmental

- water consent compliance sampling – July 2025 recorded 100% compliance rate (212 out of 212 sample
- wastewater compliance sampling – July 2025 recorded 100% compliance rate (126 out of 126 samples).

Contract performance summary

23/01 operations and maintenance contract

- we are now 8% through year three of the contract and 52% through the overall contract term.

Stewart Island pond desludging

- Due to inclement weather, Council and the Contractor amicably chose to postpone works, with the intention of recommencing in the summer period, where the project will be completed early 2026.

Kakapo RWS audit

- Te Anau Earthworks is now complete with the project, all GIS plans have been submitted for Council review. The project has uncovered several unknown leaks connections and infrastructure unknown to Council.

Edendale/ Wyndham stormwater

- this contract has been awarded to Fulton Hogan, with a commencement date of November 2025.

Lumsden stormwater

- this contract is in the design, options phase and will be procured later in 2025.

District wide AC water main renewals

- currently in construction is Worsley and Sutherland Street, Te Anau, other packages ready for tender are Fergus Square, Te Anau and Queen Street, Otuatau. These projects will be procured and delivered in the2025/2026 construction period.

District wide wastewater RETIC

- this contract is in progress with Downer delivering, currently undertaking the replacement pump station pipeline reticulation from the aging Riverton wastewater network.

Manapouri wastewater treatment plant

- the pipeline and treatment plant procurement is complete, with preferred contractors identified, to be discussed at Council on 27 August.

Riverton water treatment plant

- Southland District Council is currently reviewing the Engineer's peer review on options.

Activity summary report June 2025 – transport

Key achievements – previous month

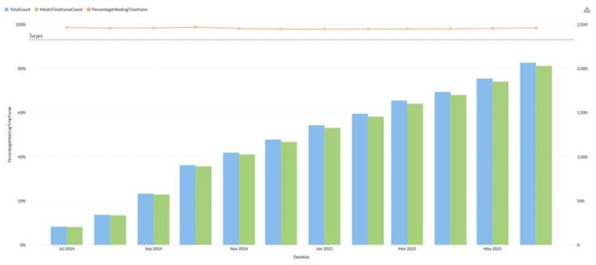
- National Asset Management Data Standard migration completed
- traffic management cost reporting for the financial year was 2.5% (Road Efficiency Group reporting)
- Transport LGA section 17A completed and reported to Council
- 2025/2026 pavement rehabilitation programme confirmed - including completing economic analysis of candidate sites (NZTA requirement)
- speed limit changes have been submitted to NZTA as required and new speed signs ordered and static signs updated.

Priorities – upcoming month

- commence procurement process for road maintenance contracts
- commence survey and design phase of 2025/2026 pavement rehabilitation programme
- asset inventory and asset database updated for end of year evaluation and reporting requirements
- finishing off the unsealed road metaling programme
- year end statistics and financial reporting to NZTA.

RFS and quality

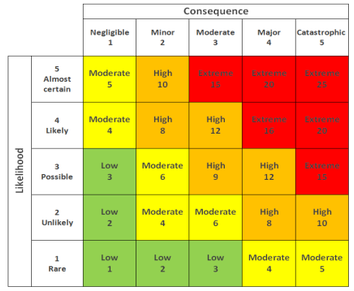
CUSTOMER SERVICE		
Requests for service	**May and June 2025**	**YTD**
General requests for service (RFS)	331	2064
Service requests completed on time	330	2028
Service request completed on time %	99.7	98.26



- RFS numbers are slightly up on previous reporting period but nothing out of the ordinary
- the trend of settled weather with long periods of relatively lights winds has largely continued from previous months with even slightly higher than average temperatures at times has helped.
- there were some periods of good frost that resulted in a number of RFS' for ice/ grit
- some snow did make an appearance later in June that kept some of the work crews busy
- there has been an increase in winter related RFS as expected but this this is not outside of normal expectations for this time of year.
- SDC staff also undertook a mid-winter sample audit (Roadroid) of the unsealed road network that produce a score 89% which is above LTP KPI.

Risks and hotspots

SDC WORKS PROGRAMME KEY RISKS		
Likelihood / Impact (Likelihood x Impact = Risk Score)		
Red	(15-25)	Extreme
Orange	(8-12)	High
Yellow	(4-6)	Moderate
Green	(1-3)	Low



		RISK FACTORS Post mitigation			
Ref No	**Works programme Risks**	**Likelihood**	**Impact**	**Risk Score**	**Mitigation actions**
1	Budgets and cost control	**4**	**4**	16	This is still seen as one of the biggest risks to impacts on levels of service with budgets not keeping pace with network needs resulting in an incremental decrease in levels of service. Cost indices risk is currently stable and assessed to the lower side of the risk spectrum.
2	Resources	3	2	6	Contractor recruitment and retention of good quality staff remains a challenge, however, overall there has been a slowdown in staff turnover which longer term should result in more stable workforce.
3	Pavement damage due to forestry traffic	2	2	4	This risk was expected to increase now that we are moving into cooler winter months. It is likely that, cooler wetter weather roads will become more at risk of pavement damage. Not only because of forestry but just in general as roads start to hold more moisture.
4	Health and safety	3	3	9	A condition of Council NZTA funding is that we move to the new risk-based approach for TTM. Key staff have attended TTM training around move to risk based approach.

Activity budget and expenditure

Item	Actual (YTD)	Projection (YTD)	Projection (full year)	Variance
Income	42,393,479	45,953,264	45,953,264	-3,559,785
Operating expenditure	19,428,645	20,822,578	20,822,578	-1,393,933
Capital expenditure	17,726,327	24,309,354	24,309,354	-6,583,027

As indicated in previous A3 reporting, the transport activity has come in under projected budget. This will result in carry forwards and these include the runway resurfacing (pushed out to November/ December), pavement rehabilitation, remaining bridge replacement funding and bridge structural programme along with crown resilient funding.

Timing of funding approvals has been a large factor in these along with some conscious decision to hold off on some work such as water channel work until after winter to capitalise on lower cartage distance when weather condition improve.

With some roading activities still under financial pressure, savings to some work budgets will be reallocated to activities where possible to compensate for the shortfall in funding e.g. sealed road resurfacing to help achieve work programmes.

Strategic planning priorities

- gravel –the team has been engaging with Environment Southland on this following the letter received around respective rules. This will take some time to work through will work through these to see if it is likely to alleviate any of the current challenges being experienced
- the roading procurement strategy is being reviewed and updated following the outcome from 17A review for council and NZTA approval. This needs to be completed by November 2025.

Health and safety

- no lost time injuries have been recorded since the start of the financial year by the roading alliance teams, however there has been 226 near hit or minor incidents recorded including discomfort/ pain injury since July
- there were 23 near hit/ misses and three incidents recorded during June, ranging from twisted knee, vehicles hitting black ice to cars on the wrong side of the road
- no environmental issues of note resulting in non-conformances have been reported, however, it has been a very wet few months that has resulted in some road flooding in places around the district.

Contract performance summary

Waimea Alliance

- drainage crews were busy over the period with some rock protection work on a water channel clearing
- the gravel metaling programme for 2024/2025 was completed (total achieved of 15,467m3)
- a local contractor undertook some gravel removal around bridge on Tomogalak Road however more work is still required in this area.

Central Alliance

- focus over the past months has continued on township related activities
- final round of road verge spraying was completed
- review of water channel clearing programme in line with planned reseal programme before locking in the work plan.
- the gravel metaling programme for 2024/2025 was completed (total achieved of 16,659m3)

Foveaux Alliance

- generally slower months leading towards year end and winter maintenance, but this did not preclude still having to deal with some flooding events on the network.
- Pre-seal repairs on Stewart Island have been completed for the season. Some additional work will be required in spring time
- budget pressure remains on the Alliance to stay on top of required works programme.

Sealed road resurfacing

- the programme was successful delivered for the year. Focus will shift to the design phase for June/ July. Stewart Island resurfacing will be the key focus for 2025/2026 year.

Pavement marking

- the programme for 2025/2026 is being worked on with the goal of having this locked by the end of August.

Bridge renewals

- tenders are out to market and will close at the end of August.

Pavement rehabs

- final sites have been completed for 2024/2025 – project delivery report will provide more detail on these.

Activity summary report June 2025 – project delivery team (PDT)

Key achievements – previous months

- completion of Riverton, Richard Street walking track
- completion of Te Anau water scheme audit and inspection
- completion of the Waikaia school safety project
- completion of Mossburn and Balfour playground refurbishments
- completion of the Wyndham Museum demolition
- Te Anau Lions Park playground refurbishment nearing completion
- completion Bridge Inn Road bridge replacement
- completion Manapouri / Te Anau runway pre-surfacing repairs
- commenced Mossburn and Te Anau Lions Park toilet contract
- awarded Wyndham, Balaclava Street stormwater renewal contract.

Priorities – upcoming months

- confirm option for remedial works for Riverton paua shell
- commence speed feedback sign installations
- continuation of the Wallacetown recreation projects
- repairs and refurbishment to Otautau War Memorial
- Tuatapere, Half Mile Road playground toilet installation
- Te Anau watermain replacements, Worsley, Sutherland and Gunn Street
- complete procurement for Manapouri wastewater pipeline
- complete procurement for Manapouri wastewater treatment plant
- procurement for Nightcaps McGregor Park pump track construction
- procurement for Winton CCTV design and install
- temporary repairs to Ulva Island, Millers Beach and Golden Bay wharves
- procurement for Riverton T wharf and long wharf repairs
- procurement of the 2025/2026 bridge replacement programme
- procurement of the 2025/2026 pavement rehabilitation programme.

Better Off summary

DESCRIPTION	TOTAL	VALUE	CLAIMED	COMMENT
Approved projects	28	$4,800,000.00		
Completed	15	$2,006,911.00	Yes	
Current In progress	10	$2,327,375.00	No	4 in final stages of completion
Future	3	$465,714.00	No	
Total	**28**	**$4,800,000.00**		

COMPLETED	IN PROGRESS	FUTURE
Athol tennis court	CB resourcing (Year 1)	Engagement and resourcing – Growing townships, Local water done well
Mossburn tennis court	Butterfields Beach walk track	
Riversdale tennis courts	Doctors Square	Garston BBQ
Balfour half court	Aparima/Oraka Taramea playground and Colac Bay beach access	Public toilets – to utilise residual BOF funding (if any)
Balfour festive lights		
Lumsden playground		
McGregor Park	Tuatapere railway station	
Mokoreta Redan hall	CB resourcing (Year 2)	
Halls - Dipton and Ryal Bush	Gwen Baker reserve	
Ohai/Nightcaps trail	Lumsden museum	
Tokanui skate park	Oreti halls – Memorial hall	
Waihopai Toetoe footpaths	Otautau camp ground	
Waikaia sculpture trail		
Waikaia mountainbike tracks		
Wyndham camp ground		

Risks and hotspots

SDC WORKS PROGRAMME KEY RISKS

Likelihood / Impact (Likelihood x Impact = Risk Score)		
Red	(15-25)	Extreme
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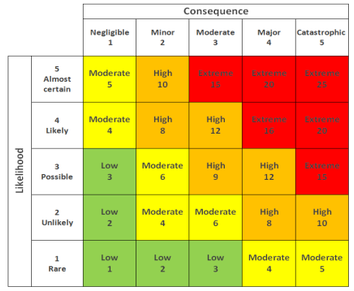


		RISK FACTORS Post mitigation			
Ref No	Works programme risks	Likelihood	Impact	Risk Score	Mitigation actions
1	Works programme not meeting targets	4	4	16	Works programme confirmed and resources allocated early. Careful estimating and forecasting to mitigate unbudgeted expenditure approvals. Improve scope definitions at planning, key partners understand and agree actual work and expectations before commencing to maintain efficient procurement and delivery.
2	Health and safety	2	3	6	All projects have risk profiles completed. All contractors and suppliers have been compliant with the regulations. Checks are being undertaken and new risk management framework is being developed.
3	Budgets and cost control	4	3	12	Early rescoping and engagement where contingency values appear insufficient. Effort required at scoping to ensure key partners and community understand cost implications for unplanned scope changes.
4	Resources	4	3	12	Assessment of programme against resources to ensure capacity and experience to deliver. Carefully monitor impacts of additional funding sources eg "Better Off "and the impacts this may have on capacity. Agree realistic delivery expectations.
5	Contractor availability/ healthy market	2	3	6	Early procurement, get to market early to get first crack at contractor availability. Provide a steady flow of work to keep contractors in our market. Updates and engagement with contractors on potential forward work and opportunities.

Strategic planning priorities

- ensuring procurement planning, documentation and tender process timeframes are understood by all parties
- ensuring scope understanding, outcomes and expectations are understood and locked in with community boards or affected parties prior to proceeding to procurement, mitigating hold ups and confusion during actual delivery
- early engagement with community boards to sign off scope on projects well in advance to establish realistic delivery timeframes
- engaging with key suppliers on critical forward works, establish a healthy market.

Health and safety

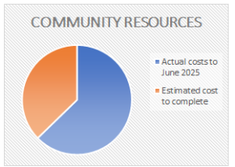
- 10 safety observations completed by PDT in May and June 2025
- Team continues to focus on PPE compliance following and increase in observations where contractor staff were not complying.

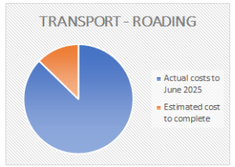
Environmental

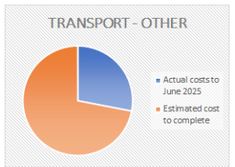
- nil at present.

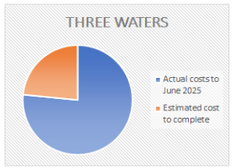
Capital delivery works programme summary

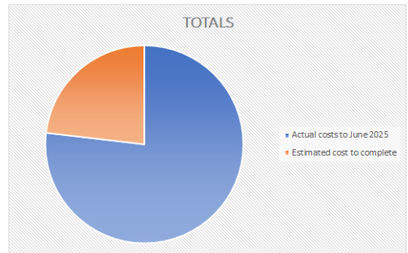
ACTIVITY	COMMUNITY RESOURCES	TRANSPORT - ROADING	TRANSPORT - OTHER	THREE WATERS	TOTALS
2024/2025 LTP budget	$7,009,357.00	$32,439,871.00	$1,869,201.00	$28,063,615.00	**$69,382,044.00**
2024/2025 carry forward movement	$7,418,205.00	$133,786.00	$-	$3,449,536.00	**$11,001,527.00**
2024/2025 approved unbudgeted expenditure	$24,203.00	$33,337.00	$-	$167,000.00	**$224,540.00**
2024/2025 total Annual Plan budget including carry forwards, prioritisation, and unbudgeted expenditure approved to date	$14,451,765.00	$32,606,994.00	$1,869,201.00	$31,680,151.00	**$80,608,111.00**
2024/2025 March Forecasting	-$3,515,851.00	-$8,477,643.00	-$739,691.00	-$4,694,316.00	**-$17,427,501.00**
2024/2025 approved budget after forecasting	$10,935,914.00	$24,129,351.00	$1,129,510.00	$26,985,835.00	**$63,180,610.00**
Actual costs to June 2025	$6,294,563.00	$17,603,661.00	$354,137.00	$18,782,188.00	**$43,034,549.00**
Jobs tagged as complete (residual budget)	-$518,284.00	-$3,889,675.00	-$4,442.00	-$703,734.00	**-$5,116,135.00**
Estimated cost to complete	**$4,123,067.00**	**$2,636,015.00**	**$770,931.00**	**$7,499,913.00**	**$15,029,926.00**











Community facilities contract renewal update

Record no: R/25/6/29453
Author: Mark Day, Community facilities manager
Approved by: Sam Marshall, Group manager customer and community wellbeing

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 To update Council on the planned procurement process for the renewal of community facilities maintenance contracts across the district and to seek direction on a potential direct procurement approach in a small number of instances.

Executive summary

2 This report provides Council with an update on the procurement strategy for renewing community facilities maintenance contracts across Southland District. These contracts cover mowing, gardening, litter collection services, toilet and office cleaning in more than 30 townships. The renewal process provides an opportunity to improve contract structure, strengthen performance monitoring and increase support for local participation, while maintaining service consistency across the district.

3 The proposed procurement model includes a revised contract packaging structure based on both activity type and geographic area, allowing flexibility for both local and regional providers. A detailed review of current levels of service has been completed with all nine community boards, with feedback used to inform contract scopes and expectations.

4 Improvements to contract management systems, including new performance dashboards and quarterly reviews, will support better oversight and accountability. A contractor support programme has also been developed to reduce barriers for smaller or first time suppliers through tailored guidance and pre-tender sessions.

5 Staff also seek Council's direction on whether direct procurement may be appropriate in limited, low value cases where local capacity is constrained and community board support is evident.

6 Work is continuing to ensure responsibilities between roading, stormwater and community are clarified where necessary through cross departmental coordination and clearer accountability within contract scopes.

7 The proposed procurement approach is designed to reflect community priorities, support local capability, and position Council for consistent, high quality service delivery across the district.

Recommendation

That Council:

a) receives the report titled "Community facilities contract renewal update".

b) determines that this matter or decision be recognised not significant in terms of Section 76 of the Local Government Act 2002.

c) determines that it has complied with the decision making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) endorses the proposed procurement approach outlined in this report for the renewal of community facilities maintenance contracts.

e) provides direction to staff on whether direct procurement may be considered in specific instances where contract values are under $50,000, subject to market testing and community board support.

Background

8 Southland District Council (SDC) currently contracts out a range of community facility services including mowing, gardening, toilet cleaning, office cleaning, and litter collection across more than 30 townships. A detailed breakdown of the current service delivery by community board area is appended as Attachment A.

9 These services are primarily delivered by larger regional contractors, alongside a small number of local businesses and community groups. While there is a strong desire to increase opportunities for local participation, staff acknowledge the continued importance of experienced providers in delivering reliable, district wide services. The renewed procurement approach aims to maintain high standards while adapting the process to make participation more accessible to smaller contractors where appropriate.

10 This report also outlines the implementation of the internal "Community Facilities Contract Plan" (June 2025), a strategic planning document that sets out:

- consultation with community boards
- review of levels of service and current contract performance
- proposed contract packaging and structure (mowing, cleaning, arboriculture)
- key timelines and performance expectations
- risk and audit considerations

11 Engagement with the nine community boards has included a review of current service levels, identification of areas for improvement, and a commitment to ensure community feedback informs final contract scopes. The plan supports a phased and structured approach to market engagement, allowing for both open competition and tailored support for local suppliers.

12 As part of this renewal process, staff undertook a structured review of Levels of Service in consultation with all nine community boards. Feedback has been broadly consistent across the district and reflects the following themes:

- Mowing and gardening: expectations have generally remained the same, although there is increased interest in improved frequency or quality in high profile areas (e.g. town entrances, war memorials)
- Public toilets and cleaning: most communities have expressed satisfaction with current standards but are seeking greater responsiveness during peak visitor periods
- Litter collection: some towns are requesting minor frequency increases, especially near community hubs or during events
- Flexibility: a common theme has been the desire for Council to retain the ability to respond quickly to seasonal demand or local priorities.

13 These insights are shaping the contract scopes and performance expectations, ensuring future delivery aligns more closely with evolving community needs.

14 The procurement process must balance service quality, value for money, and fairness in access to opportunities. In response, staff have designed a procurement model that promotes participation and builds capability.

Existing contracts

15 SDC currently holds multiple contracts for the delivery of mowing, gardening, cleaning, and litter collection services across its network of parks, cemeteries, town centres, and public facilities. These contracts are predominantly delivered by established regional providers, as well as a small number of local operators and community based organisations.

16 The current contract structure has remained largely consistent for several years, with most agreements set to expire 30 June 2026. While performance across many areas has been strong, particularly in terms of reliability and consistency, feedback from community boards and internal reviews has identified areas for improvement, particularly around responsiveness to local needs, clarity of responsibilities, and opportunities for smaller contractors to participate.

17 This contract renewal process presents an opportunity to address those issues by reshaping the structure and packaging of services. It aims to retain the strengths of the current model while introducing greater flexibility, clearer accountability, and a stronger alignment with community expectations and local capacity.

Consideration of direct procurement for low value contracts

18 The new contract model will group services into logical activity streams (e.g. mowing, gardening, cleaning, litter collection) while allowing separable portions by geographic area to support both regional providers and local suppliers.

19 The contract structure will include:

- Activity based packages: mowing and gardening will be separated from cleaning and litter collection to reflect differing scopes and contractor capabilities
- Geographic clusters: contracts will be bundled by township or community board area. Contractors may bid for individual areas or multiple groupings, depending on their capacity

- Hybrid opportunities: in some locations, combined contracts (e.g. mowing and gardening) will be offered to reflect practical delivery efficiencies or local provider strengths.

Consideration of direct procurement for low value contracts

20 While the majority of community facilities maintenance contracts will proceed through a competitive open market process, staff acknowledge there may be limited circumstances where direct procurement offers a more efficient and locally appropriate outcome. In particular, community boards have identified that in some small townships or specialist areas, existing providers may be best placed to continue service delivery, especially where the contract value is relatively low and local capacity or competition is limited.

21 To support this, staff seek Council's guidance on whether direct procurement could be considered in cases where:

- the total annual contract value is below $50,000
- the community board supports the direct engagement of a known local provider via recommendation
- market testing or pricing validation confirms the proposal represents good value for money
- the contractor has demonstrated satisfactory past performance, and the scope is well defined.

22 Allowing this flexibility within clear parameters could streamline delivery in a small number of unique cases without compromising transparency or performance expectations. Council's position on this matter will help inform how staff engage with community boards in the coming months. Note this does align with SDC Procurement Policy and Buyers Guide.

Proposed procurement approach

23 To ensure the contract renewal process is responsive, transparent, and delivers value for money, staff have developed a procurement approach that is both structured and adaptable. The model is informed by feedback from community boards, internal lessons learned, and a review of how services have been delivered to date. It focuses on supporting both continuity of quality service and increasing accessibility for local contractors.

1. Enabling local participation

To support a broader range of supplier participation, contracts will be designed with separable portions that align with individual townships or community board areas. This structure enables local contractors who may lack the capacity to service the entire district to submit proposals for specific locations they are familiar with and are confident in their ability to deliver. It also reflects community feedback about the importance of local knowledge, responsiveness, and accountability. While larger regional contractors will still have the ability to bid for larger groupings or multiple areas, this flexible packaging increases the opportunity for local economic development.

2. Removing barriers

Recognising that government procurement processes can be challenging particularly for small or first time bidders, staff will run a series of pre tender drop in sessions across each community board area. These sessions are intended to demystify the process and provide prospective contractors with practical, hands on support. Attendees will receive assistance with navigating the Government Electronic Tender Service (GETS) platform, understanding the scope documents, and

preparing pricing schedules. Council's Health and Safety Advisor will be available to explain the approved contractor process and assist with prequalification requirements. To further support participation, staff will prepare simplified guidance documents, templated responses, and offer printed materials on request to reduce digital barriers.

3. Clear expectations and performance monitoring

All contracts will include a consistent, clearly defined performance framework built on a set of standardised Key Performance Indicators (KPIs). The KPI model will cover three key areas:

- Contract administration – focusing on timely and accurate reporting, financial compliance, and health and safety systems
- Service delivery – measuring the timeliness, quality and completeness of scheduled tasks such as mowing or cleaning
- Customer experience – monitoring Request for Service (RFS) responsiveness, complaint handling and community satisfaction.

24 Contractor performance will be reviewed monthly with formal quarterly assessments. This ensures early identification of risks, provides a basis for continuous improvement, and supports accountability across all contracts. High performing contractors who consistently meet or exceed their KPI thresholds will be eligible for performance based contract extensions or renewals, rewarding excellence and continuity of service.

Contractor support and communications plan

25 To support a wide and equitable pool of contractors, to participate in the upcoming procurement process, staff have developed a dedicated contractor support and communications programme. This initiative is designed to reduce barriers to entry, particularly for smaller or first time suppliers, and to ensure all potential bidders have access to the resources and information they need to participate effectively.

Key components of the programme include

- drop in information sessions to be hosted in each community board area in the weeks prior to the tender release. These sessions will offer an informal, approachable space for contractors to ask questions, receive early guidance, and meet Council staff
- Health and Safety Advisor participation at each session to walk contractors through the approved contractor registration process and address health and safety requirements early
- one on one support appointments available with the procurement officer for contractors needing extra help in understanding GETS or completing the tender documentation
- hard copy information packs available on request, including draft scope summaries and pricing examples, to assist contractors with limited digital access or procurement experience
- simplified supporting resources such as FAQs, step by step tipsheets, and a contact directory to guide contractors through the procurement process.

26 This support will be well communicated and promoted to maximise awareness and attendance and will be tailored to reflect local feedback received during community board consultation. While all contractors must meet Council's standard criteria and performance expectations, the intent is to reduce unnecessary complexity and empower a broader range of suppliers to engage with confidence.

Lessons learned and risk management

27 Reflecting on the delivery and performance of current and previous community facilities contracts, staff have identified a number of key lessons to inform this renewal process. These insights have been drawn from both internal review and contractor feedback and are shaping how the new contracts are designed and procured.

Notable improvements include

- clearer scope definitions and role boundaries, helping ensure alignment between Council expectations, contractor responsibilities, and actual deliverables. This aims to eliminate ambiguity and reduce misunderstandings over task ownership
- stronger performance monitoring and audit frameworks, enabling issues to be identified and addressed more proactively. Quarterly reviews and structured reporting will support ongoing improvement and compliance
- inclusion of minor works and renewal elements within contract scopes, to allow greater responsiveness to small scale upgrades or maintenance needs throughout the contract term
- formalised onboarding and induction processes for new contractors, providing clearer expectations, procedural guidance, and relationship building at the outset
- procurement and contract design that supports local participation, including smaller contract packages, plain language documentation, and community specific engagement.

28 To manage risks associated with contractor performance, service continuity, and market responsiveness, Council will take a proactive role in oversight and communication. Structured transition planning will be undertaken ahead of contract start dates to minimise disruption. The combination of clear expectations, consistent engagement, and performance incentives will help ensure reliable service delivery across the district.

Contract management and oversight improvements

29 A parallel workstream is underway to strengthen internal contract management systems and support improved supervision and oversight. Key initiatives include

- establishment of a standardised contract manager induction and handover framework for all new and renewed contracts
- development of a new contract dashboard for performance tracking, integrating KPI monitoring, RFS responsiveness, and budget reporting
- quarterly contract performance review meetings with each contractor, documented through a consistent evaluation template

- centralisation of site inspection protocols and Health and Safety compliance assessments under a single internal audit calendar.

30 These improvements will ensure greater consistency, transparency, and accountability, and will equip contract managers with better tools to drive service excellence.

Resolving accountability gaps between departments

31 A long standing operational issue has been the lack of clarity around who is responsible for mowing, spraying, and weed control across some boundary areas especially where activities overlap between roading, stormwater, and community facilities teams. A specific case raised was in the Wyndham town centre, where confusion has led to inconsistent outcomes.

32 To address this, the following actions are being progressed:

- across departmental mapping exercise is underway to identify all "grey areas" and confirm accountability by activity and location
- service scopes in the new community facilities contracts will include a responsibility matrix that clarifies ownership and escalation pathways.

Factors to consider

Legal and statutory requirements

33 All procurement activities will be undertaken in accordance with the Southland District Council Procurement Policy and relevant statutory requirements under the Local Government Act 2002. Where direct procurement is proposed, appropriate due diligence, value for money validation, and transparency requirements will be followed to ensure compliance and auditability.

Community views

Engagement with community boards has played a central role in shaping the contract scope and structure. Local feedback has strongly supported the inclusion of smaller and community based contractors and requested greater responsiveness and accountability in service delivery. This report responds to those expectations while ensuring operational consistency across the district.

Costs and funding

34 The existing budgets to cover the cost of the current contracts have been approved through the 2024-2034 Long Term Plan. These will need to be reviewed once the new contracts have been evaluated and awarded, staff may have to go back to the community boards for additional funding. If this is above their financial delegation, they will need to make a recommendation to Council to approve additional funding.

Policy implications

35 The procurement approach aligns with Council's procurement policy, community facilities AMP, and strategic objectives around supporting local economic development and enhancing service delivery outcomes.

Analysis

Options considered

Analysis of options

Option 1 – Proceed with the procurement and support programme as proposed
Advantages

Advantages	*Disadvantages*
• builds in lessons learned from current contracts • supports local contractor participation and economic development • encourages transparency and fairness in procurement • improves accountability through a consistent KPI based framework • responds to community board feedback and local needs.	• requires additional upfront staff time and support resources • may result in more complex contract management due to greater contractor diversity • some smaller contracts may still fail to attract local interest despite support efforts

Option 2 – Maintain current contract model without redesign or additional support

Advantages	*Disadvantages*
• minimal change required, low additional staff effort • maintains continuity with current providers.	• missed opportunity to address responsiveness and local capability concerns • limits opportunity for new or smaller contractors to participate • does not address current service delivery gaps or scope clarity issues • risks reputational impact if community feedback is not reflected.

Recommended option

36 That Council proceed with option one, adopting the revised procurement model and contractor support programme as outlined. This approach promotes community aligned service delivery, ensures transparency, and provides a practical pathway for both regional and local contractors to contribute effectively.

Next steps

37 Should Council approve the recommendation staff will work to complete the tender process in throughout the remainder of 2025 and into early 2026.

Attachments

A Breakdown of current township contracts ⇩

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Ardlussa	Balfour	Yes	Balfour Progress League	Yes	Balfour Lions	Yes	Southroads	No		Yes	Balfour School
	Waikaia	Yes	Waikaia Progress League	No		Yes	Local Museum	No		Yes	Local shop looks after the bin.
	Riversdale	Yes	McDonoughs Contracting	Yes	Amenity Contracting	Yes	Community Center	No		Yes	Southroads
	Taylor Park	Yes	McDonoughs Contracting	No		No		No		No	

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Northern	Athol	Yes	McDonoughs Contracting	Yes	CMT	Yes	South Roads	No		No	
	Garston	Yes	McDonoughs Contracting	No		Yes	South Roads	No		Yes	Southroads
	Mossburn	Yes	McDonoughs Contracting	Yes	CMT	Yes	South Roads	No		Yes	Southroads
	Lumsden	Yes	McDonoughs Contracting	Yes	CMT	Yes	South Roads	Yes	OCS	Yes	Southroads

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Fiordland	Te Anau	Yes	Amenity Contracting	Yes	Amenity Contracting	Yes	OCS	Yes	OCS	Yes	Amenity Contracting
	Manapouri	Yes	Amenity Contracting	Yes	Amenity Contracting	Yes	OCS	No		Yes	Amenity Contracting
	Lynwood Cemetery	Yes	Amenity Contracting							Yes	Amenity Contracting

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Tuatapere Te Waewae	Monkey Island	Yes	Delta	No		Yes	Southroads	No		Yes	Southroads
	Gem Stone Beach	No		No		No		No		Yes	Southroads

	Monowai	Yes	Amenity Contracting	No		Yes	Southroads	No		No	
	Orepuki	Yes	Delta	Yes	CMT	Yes	Southroads	No		Yes	Southroads
	Tuatapere	Yes	Delta	Yes	Elaine Charlton and CMT	Yes	Southroads	No		Yes	Southroads
	Clifden	Yes	Delta	No		Yes	Southroads	No		No	
	Cosy Nook					Yes	Southroads	No		Yes	Southroads
	Fishermans Toilet/Te Waewae					Yes	Southroads	No		No	

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Stewart Island	Oban	Yes	Fulton Hogan	Yes	Melinda Barnsdale and CMT	Yes	Fulton Hogan	Yes	Staff ?	Yes	Fulton Hogan

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Oraka Aprima	Colac Bay	Yes	Delta	No		Yes	Fulton Hogan	No		Yes	Southroads
	Garden Bay	No		No		No		No		Yes	Southroads
	Fairfax	Yes	Delta	No		No		No		No	
	Riverton	Yes	Delta	Yes	CMT	Yes	Fulton Hogan	Yes	OCS	Yes	Southroads
	Thornbury	Yes	Delta	No		Yes	Fulton Hogan	No		Yes	Southroads

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Oreti	Browns	Yes	Delta	Yes	CMT	No		No			
	Dunsdale	Yes	Delta	No		Yes	Delta	No		No	
	Dipton	Yes	Delta	Yes	CMT	Yes	Southroads	No		Yes	Southroads
	Drummond	Yes	Delta	Yes	CMT	No		No		Yes	Southroads
	Limehills	Yes	Delta	No		No		No			
	Waianiwa	Yes	Delta	No		No		No			
	Wallacetown	Yes	Delta	Yes	Scarecrow & CMT	Yes	Local Garage	No		Yes	Southroads
	Winton	Yes	Delta	Yes	Neville McPherson	Yes	Southroads	Yes	OCS	Yes	Southroads

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Wallace Takitimu	Nightcaps	Yes	Delta	Yes	Neville McPherson	Yes	Southroads	No		Yes	Southroads
	Ohai	Yes	Delta	No		Yes	Southroads	No		Yes	Southroads
	Otautau	Yes	Delta	Yes	Tom Dahlenburg	Yes	Southroads	Yes	OCS	Yes	Southroads
	Wairio	Yes	Delta	No		No		No		No	

CB Area	Town	Mowing	Current Contractor	Gardening	Current Contractor	Toilet Cleaning	Current Contractor	Office Cleaning	Current Contractor	Street Litter Bin collection	Current Contractor
Waihopi Toetoe	Edendale	Yes	Delta	Yes	CMT	Yes	Fulton Hogan	No		Yes	Fulton Hogan
	Fortrose	Yes	Delta	No		Yes	Fulton Hogan	No		No	
	Gorge Road	Yes	Delta	Yes	Group and CMT	Yes	Fulton Hogan	No		No	
	Mokoreta	Yes	CMT	No		No		No		No	
	Slope Point	No		No		Yes	Fulton Hogan	No		No	
	Tokanui	Yes	Delta	No		Yes	Fulton Hogan	No		Yes	Fulton Hogan
	Rimu Monument	Yes	CMT	No		No		No		No	
	Waikawa	Yes	Delta	No		Yes	Fulton Hogan	No		No	
	Weirs Beach	Yes	Delta	No		Yes	Fulton Hogan	No		No	
	Woodlands	Yes	Delta	Yes	CMT	No		No		Yes	Fulton Hogan
	Wyndham	Yes	Delta	Yes	CMT	Yes	Fulton Hogan	Yes	OCS	Yes	Fulton Hogan

Budget carry forward requests from 2024/2025 financial year into the 2025/2026 financial year

Record No: R/25/8/37741
Author: Avneet Deo, Finance Business Partner
Approved by: Anne Robson, Group manager finance and assurance

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 To inform Council of the projects and operational expenditure approved for delivery in the 2024/2025 year that were not completed by year end, and to seek approval from Council to carry forward these projects and budgets to the 2025/2026 and 2026/2027 year.

Executive summary

2 Every year as part of the Annual Plan/Long Term Plan process, Council staff and elected members identify projects to be undertaken, and the funding needed to complete the work. Due to various reasons, these projects are not always completed in the financial year they were budgeted to occur in. Where a commitment or the project has started, the costs need to be carried forward to complete the work.

3 The projects proposed to be carried forward are also included in the report "capital delivery programme update – June 2025" taken to Finance and Assurance Committee on 27 August 2025.

4 The projects and operational expenditure identified by staff as needing to be carried forward, along with the reason the work has not been completed, are included in Attachments A-K.

5 This year it is proposed to carry forward:

- 153 items to the 2025/2026 financial year with a net value of $21.4 million. Of this total, $15.9 million is related to capital expenditure, $4.6 million is for operational expenditure, $0.9 million for vehicle renewals. The main reasons for the carry forwards are due to multi-year projects/operational expenditure and projects in consultation or consenting phase.
- two items to the 2026/2027 financial year with a net value of $14,300 as the projects are currently in consultation phase.

6 There are 48 multi-year expenditure items ($14.7 million) that comprised 69% of the total amount requested to carry forward to 2025/2026.

7 Based on the narration provided on the completed forms, the carry forwards have been categorised into broad reasons as follows:

Consolidated reason for 2025/2026 proposed carry forwards	$millions	%
Multi-year expenditure made up of: • *Mult-year capital and operational expenditure projects - $13.7 million* • *Multi-year operational expenditure - $1.0 million*	14.7	69%
Projects in consultation or consenting phase	2.3	11%
Projects where physical work is expected to begin early in 2025/2026 financial year	1.5	7%
Vehicle renewal	0.9	4%
Projects nearing completion or completed waiting for final invoices	0.8	4%
Projects rescoped or further decision/information required	0.5	2%
Reallocation of surplus budget for alternate use	0.4	2%
Contractor or internal resources availability	0.3	1%
Total	21.4	100%

8 It is to be noted that this does not include all projects included in the Long Term Plan for 2024/2025 that have not been completed. As part of the forecasting process in February 2025, staff identified projects that were unlikely to be completed and these were moved to future years as part of preparing the 2025/2026 Annual Plan.

9 Where the actual amount spent on a project in 2024/2025 was higher than the budget remaining available, a negative amount (carried back) has been included in Attachments A-K. This reflects the fact that the higher expenditure in 2024/2025 will need to be funded from within the existing 2025/2026 budget.

10 Work is expected to be delivered within the existing budgets. However, for projects which will require additional funds, these will be requested through normal processes.

11 Staff are requesting Council to consider the carry forward requests included in Attachments A-K and approve as indicated, subject to any comments and changes agreed at the meeting.

Recommendation

That Council:

a) Receives the report titled "Budget carry forward requests from 2024/2025 financial year into the 2025/2026 financial year"

b) Determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002

c) Determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the Act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter

d) Approves the capital expenditure projects of $3,092,805 below to be carried forward or (brought back from) the 2025/2026 financial year, to be funded from the sources as detailed in attachment A.

Category/ activity	Project name	Amount ($)
Community resources	District wide - library refurbishment	123,600
Community resources	Tuatapere Half Mile Road playground toilet	176,336
Community resources	Te Anau Lions Park toilet - refurbishment	431,607
Community resources	Athol toilet - renewal	3,476
Community resources	District wide - toilets renewal preparation	20,000
Community resources	District wide - toilets renewal construction	100,000
Community resources	Monkey Island - shelter area development (stage 2)	86,810
Community resources	Waikiwi yard - remove hedges and build new fences	38,513
Community resources	Te Anau recycling container relocation	25,302
Community resources	Balfour hall re-roofing	120,000
Community resources	Manapouri turbine sign	15,000
Community resources	Mossburn toilet renewal	330,520
Community resources	Purchase land to increase size of Riverton cemetery	225,836
Community resources	Purchase and relocation of Paua Shell	1,094
Community resources	Riverton estuary planting	20,000
Community resources	Walking track along Horsehoe Road to Butterfield Beach	58,200
Community resources	Te Anau Lions Park playground equipment renewal	164,829
Community resources	Tuatapere domain gate	5,819
Community resources	Tuatapere historic railway station	79,554
Community resources	Wallacetown recreational project	73,643
Community resources	Winton install CCTV	65,000
Community resources	Winton Great North Road development	20,000
Community resources	Woodlands interpretation panels	10,000
Community resources	Wyndham camping ground construction	3,058
Corporate services	Starlink - Stewart Island offices and pavilion	3,309
Sewerage	Stewart Island wastewater consent renewal	41,610

Stormwater	Te Anau stormwater upgrade	61,792
Transport	Improve Around the Mountain Cycle Trail experience (easements)	23,681
Transport	Around the Mountain Cycle Trail improvements	20,000
Transport	Edendale - speed feedback sign at Ferry Road	9,772
Transport	Wyndham - speed feedback sign at Ferry Road	9,772
Transport	Wyndham - speed feedback sign at Wyndham Road	9,772
Transport	Edendale - speed feedback sign at Seaward Road	9,772
Transport	Wyndham - speed feedback sign at Wyndham Letterbox Road	9,772
Transport	Manapouri - sealing of footpath opposite the church and shop on Waiau Street	9,800
Transport	Riverton Richard Street walking track	1,841
Transport	Golden Bay walkway investigation	73,714
Transport	Te Anau - construction of pedestrian facilities on Sandy Brown Road	95,431
Transport	Tokanui Niagara highway speed sign	(10,228)
Transport	Tokanui Gorge Road highway speed sign	(10,228)
Transport	Woodlands speed signs	(10,228)
Water supply	Manapouri water treatment plant - turbidity upgrade	30,288
Water supply	Mossburn water supply consent renewal preparation	26,477
Water supply	Te Anau rural water scheme audit inspections	192,628
Water supply	Te Anau rural water - Takitimu scheme	203,297
Water supply	Te Anau rural water - Takitimu consent renewal	50,086
Water supply	Tuatapere water supply ultraviolet system replacement	42,479

e) Approves the capital expenditure multi-year projects of $12,559,862 below to be carried forward or (brought back from) the 2025/2026 financial year, to be funded from the sources as detailed in attachment B.

Category/ activity	Project name	Amount ($)
Community resources	Invercargill building replacement	319,400
Community resources	Nightcaps - development of McGregor Park	96,017
Community resources	Riverton Taramea Bay playground equipment replacement	276,398
Community resources	Riverton riparian planting	5,000
Community resources	Te Anau basin development	55,463
Community resources	Otautau war memorial replacement	13,863
Community resources	Camping ground in Otautau (Holt Park)	324,135
Sewerage	District wide - wastewater main reticulation network renewals	590,057
Sewerage	Manapouri wastewater treatment upgrade	858,447
Sewerage	Nightcaps wastewater treatment upgrade	189,824
Sewerage	Preparing consent renewal for Winton scheme	50,513
Sewerage	Inflow and infiltration investigation to sewer networks at various sites	250,000
Sewerage	Edendale/Wyndham wastewater plant consent renewal and upgrade	244,957

Stormwater	Wyndham stormwater replacement	1,018,314
Stormwater	Lumsden stormwater catchment investigation and improvement work	395,122
Transport	District wide - bridge programme 2024-2034	157,425
Transport	District wide-unsealed road renewal programme 2024-2034	256,089
Transport	District wide - resurfacing programme 2024-2034	(109,890)
Transport	District wide - drainage renewal programme 2024-2034-level of service	34,454
Transport	District wide - drainage renewal programme 2024-2034	588,439
Transport	District wide - pavement rehabilitation programme 2024-2034	2,711,352
Transport	District wide - structure component renewal programme 2024-2034	533,181
Transport	District wide - traffic services programme 2024-2034-level of service	107,410
Transport	District wide - traffic services programme 2024-2034	96,949
Transport	District wide - roading resilience programme 2024-2034	921,818
Transport	Riverton T wharf replacement	200,000
Transport	Ulva Island jetty rebuild	582,817
Transport	Runway surface	818,845
Water supply	Multi scheme AC water main reticulation pipe - early replacement of asbestos cement	804,903
Water supply	Ohai/Nightcaps Wairio water plant tank replacement	59,921
Water supply	Riverton new water treatment plant	56,889
Water supply	Mt York rural water consent renewal	51,750

f) Approves the operational expenditure projects of $1,560,215 below to be carried forward into the 2025/2026 financial year, to be funded from the sources as detailed in attachment C.

Category/ activity	Project name	Amount ($)
Community resources	Acquisition of new cemetery management software	55,284
Community resources	Waikiwi yard options analysis	10,000
Community resources	Community housing - 56 Seaward Road repairs	27,112
Community resources	Solid waste- Otautau closed landfill protection works	1,080,200
Community resources	Balfour Kruger Street subdivision investigation	47,845
Community resources	Dipton repair or replace access foot bridge	10,000
Community resources	Manapouri hall exterior repaint	72,021
Community resources	Riverton harbour refurbishment	10,000
Community resources	Curio Bay reserve management plan	8,796
Community resources	Tuatapere library exterior repaints	20,000
Community resources	Otautau concept plan for new playground	8,250
Community resources	Winton RSA hall interior refurbishment	40,000
Community resources	Wyndham museum sale/demolition	100,911
Corporate services	District wide - ongoing digitisation	43,000
Transport	Stewart Island wharves - refurbishment Millers Beach	26,796

g) Approves the operational expenditure multi-year projects of $1,182,916 below to be carried forward into the 2025/2026 financial year, to be funded from the sources as detailed in attachment D.

Category/ activity	Project name	Amount ($)
Corporate services	District wide - archives business case	100,000
Corporate services	District wide - core system replacement	757,814
Sewerage	Stewart Island wastewater oxidation pond desludging	325,102

h) Approves the capital expenditure of $108,858 below to be carried forward into the 2025/2026 financial year, to be funded from the sources as detailed in attachment E.

Category/ activity	Project name	Amount ($)
Community resources	Book bus	10,973
Corporate services	Portable visual display boards	76,000
Transport	Halfmoon Bay wharf investigation	21,885

i) Approves the operational expenditure of $699,116 below to be carried forward into the 2025/2026 financial year, to be funded from the sources as detailed in attachment F.

Category/ Activity	Project Name	Amount ($)
Community leadership	Southland local government structural opportunity	25,650
Community leadership	Milford opportunities project	34,269
Community leadership	Lumsden museum redevelopment	50,000
Community leadership	Doctors Square - better off funding	38,281
Community leadership	Legal costs for judicial review	18,227
Community leadership	Riverton RSA Thornbury memorial project	3,543
Community resources	Dipton tree and hedge	4,000
Community resources	Edendale Wyndham tree and hedge	5,720
Community resources	Garston tree and hedge	4,460
Community resources	Mossburn tree and hedge	3,094
Community resources	Ohai tree and hedge	5,207
Community resources	Orepuki tree and hedge	6,000
Community resources	Riverton tree and hedge	12,460
Community resources	Tuatapere tree and hedge	3,739
Community resources	Otautau tree and hedge	23,263
Community resources	Wallacetown tree and hedge	4,764
Community resources	Winton tree and hedge	12,178
Corporate services	Democracy and communication general projects	30,409
Corporate services	Internal audit programme	29,000
Corporate services	Stewart Island Rakiura renewable energy	65,726
Corporate services	Strategy and partnership general projects	154,000
Corporate services	Project delivery - better off funding	39,127

Environmental services	Building control general projects	100,000
Transport	Road Safety Southland general projects	26,000

j) Approves the multi-year operational expenditure of $988,059 below to be carried forward or (brought back from) the 2025/2026 financial year, to be funded from the sources as detailed in attachment G.

Category/ activity	Project name	Amount ($)
Community leadership	Three waters and spatial planning	133,013
Environmental services	Resource planning plan changes	124,327
Environmental services	Future township spatial planning	107,364
Transport	Sealed pavement maintenance	(141,173)
Transport	Unsealed pavement maintenance	350,773
Transport	Routine drainage maintenance	(296,100)
Transport	Structures maintenance	272,979
Transport	Environmental maintenance	(62,764)
Transport	Traffic services maintenance	28,817
Transport	Level crossing maintenance	3,876
Transport	Network and asset management	229,060
Transport	Maintenance of the Lower Hollyford Road	84,227
Transport	Te Anau Airport Manapouri review stage 2	153,660

k) Approves the vehicle renewals of $862,500 below to be carried forward into the 2025/2026 financial year, to be funded from the sources as detailed in Attachment H.

Category/ activity	Project name	Amount ($)
Corporate services	Replacement of 23 vehicles	1,150,000
Corporate services	Proceed from sale of 23 vehicles	(287,500)

l) Approves the following budget of $39,442 to be carried forward into the 2025/2026 financial year for an alternate use which are funded by grants. Attachment I provides details of the alternate use of the surplus budget.

Category/ activity	Project name	Amount ($)
Community leadership	Stewart Island Rakiura community partnership fund	1,211
Community resources	Athol tennis court resurface	1,938
Community Resources	Colac Bay beach access steps	4,900
Community Resources	Nightcaps to Ohai railway walking track	2,761
Community Resources	Ryal Bush community centre re-roof	25,870
Corporate Services	Mcgregor park masterplan	2,761

m) Approves the following budget of $354,005 to be carried forward into the 2025/2026 financial year and used alternative projects. Attachment J provides details of alternate use and the source of fund.

Category/ Activity	Project Name	Amount ($)
Community Resources	Structural planting of areas at Curio Bay, Slope Point and Colac Bay	38,314
Community Resources	Edendale recreation reserve playground equipment renewal	2,855
Community Resources	Te Anau Henry Street playground	12,519
Community Resources	District wide - toilets refurbishment of four toilets	146,478
Community Resources	Tuatapere community housing exterior repairs	66,915
Community Resources	Community housing interior repaints five units	20,011
Community Resources	District refuse close landfills	46,917
Transport	Waikaia additional streetlights	19,996

n) Approves the expenditure of $14,300 below to be included in the 2026/2027 Annual Plan, to be funded from the sources as detailed in attachment K.

Category/ activity	Project name	Amount ($)
Capital expenditure		
Community resources	Colac Bay Manuka Street playground - equipment replacement	5,150
Operational projects		
Community Resources	Tuatapere - concept design for Memorial park	9,150

o) Approves reallocation of $1,000,000 from the three year approved NZTA pavement rehabilitation programme to the resurfacing programme.

Background

12 Every year Council staff carry out projects as planned in the Long Term Plan. Although many are completed in the financial year they were budgeted in, a number of projects are delayed for varying reasons, but are still identified as needed by community boards and/or Council staff.

13 These projects are generally carried forward to the next financial year. While the majority of carry forward projects are maintenance or capital in nature, budget managers can also request operational expenditure budgets to be carried forward where these have been committed.

14 After 30 June 2025, the end of the financial year, the preparation of the Annual Report 2024/2025 provides the final opportunity to identify projects and expenditure required to be carried forward. This final step requires managers to confirm that the project/expenditure is still required and obtain approval from the relevant group manager. The finance team then confirms that the funds are available to be carried forward after allowing for actual costs during the year. The carry forward projects/budgets are then considered by Council.

15 Attachments A-K have 155 items proposed to be carried forward to the 2025/2026 and 2026/2027 financial year with a net value of $21.4 million. Details of the proposed carry forwards have been included in the attachments as follows:

- Attachment A – provides proposed carry forward details for capital expenditure projects with a value of $3.1 million.

- Attachment B – provides proposed carry forward details for multi-year capital projects with a value of $12.6 million.
- Attachment C – provides proposed carry forward details for operational expenditure projects with a value of $1.6 million.
- Attachment D – provides proposed carry forward details for multi-year operational projects with a value of $1.2 million.
- Attachment E – provides proposed carry forward details for capital expenditure with a value of $0.1 million.
- Attachment F – provides proposed carry forward details for operational expenditure with a value of $0.7 million.
- Attachment G – provides proposed carry forward details for multi-year operational expenditure with a value of $1.0 million.
- Attachment H – provides proposed carry forward details for vehicle renewals with a value of $0.9 million.
- Attachment I – provides details of the $39,442 budget to be carried forward into the 2025/2026 financial year for an alternate use which are funded by grants
- Attachment J – provides details for the $0.4 million budget to be carried forward into the 2025/2026 financial year and used for alternative projects.
- Attachment K – provides proposed carry forward details for expenditure to be included in the Annual Plan for 2026/2027 with a value of $14,300.

16 Attachments A-D and some projects listed in attachments I-J are included as part of the capital delivery programme update provided to Finance and Assurance Committee on 27 August 2025.

17 The following table shows the breakdown of carry forward expenditure by type compared to the past four years. This is an increase of $8.3 million from prior year, where 107 items with a value of $13.1 million were carried forward to 2024/2025.

Carry forward breakdown	2025/2026 (proposed)	2024/2025 (actual)	2023/2024 (actual)	2022/2023 (actual)	2021/2022 (actual)
	$millions	$millions	$millions	$millions	$millions
Income	-	-	(1.4)	-	-
Operational expenditure	4.7	2.2	2.4	2.4	1.3
Capital expenditure	16.7	10.9	11.6	10.2	2.9
Total expenditure	**21.4** (153 items)	**13.1** (107 items)	**12.6** (133 items)	**12.6** (166 items)	**4.0** (106 items)

18 A contributing factor for a number of proposed carry forwards was due to late adoption of the long term plan on 26 August 2024, which effectively reduced the project delivery window to ten months. This timeframe was further constrained by seasonal limitations such as weather-dependent activities.

19 The full breakdown of the proposed 2025/2026 carry forwards by activity is shown in the following table.

Activity group	2025/2026 proposed carry forward		2024/2025 carry forward	
Activity	**Items**	**$millions**	**Items**	**$millions**
Community leadership	**8**	**0.3**	**10**	**0.6**
Community resources	**67**	**5.2**	**47**	**7.8**
Parks and reserves	39	1.5	19	0.9
Toilets	8	1.3	5	0.9
Waste services	3	1.2	2	0.2
Offices and buildings	2	0.3	9	5.3
Others	15	0.9	12	0.5
Corporate services	**13**	**2.2**	**18**	**0.9**
Environmental services	**3**	**0.3**	**10**	**0.3**
Sewerage	**8**	**2.6**	**7**	**2.0**
Stormwater	**3**	**1.5**	**1**	**0.1**
Transport	**41**	**7.8**	**10**	**0.3**
Roading	20	5.8	6	0.1
Others	21	2.0	4	0.2
Water supply	**10**	**1.5**	**4**	**1.1**
Total	**153**	**21.4**	**107**	**13.1**

20 Roading contributes 20 items with a value of $5.8 million. This compares to $0.1 million in the prior year. This reflects the 2024/2025 financial year being the first year of a new three year ending cycle with the New Zealand Transport Agency (NZTA). In part this was delayed with final approval received from NZTA in September 2024 and reviewing what could be delivered within the reduced parameters. Three waters have a number of multi-year projects delayed while waiting for wastewater standards to be finalised or working through design/procurement processes.

21 Offices and buildings show a significant decrease between 2024/2025 and the 2025/2026 proposed carry forwards, with a minimal amount proposed to be carried forward for the Invercargill building project with this being done as part of forecasting.

22 The budget carry forwards to 2025/2026 for community resources were mainly due to following areas:

- extensive community and stakeholder engagement/consultation in some significant projects resulted in delays to subsequent design resolution and implementation phases.
- due to the timing of budget adjustments, procurement processes, contractor availability, and consenting, most projects were prepared for delivery late in the 2024/2025 financial year and are now scheduled for physical delivery in early 2025/2026 financial year.

23 Roading is requesting transfer of $1.0 million from the three year NZTA programme be moved from the pavement rehabilitation programme 2024-2027 to resurfacing programme 2024-2027. This is to support a more expensive treatment for resurfacing which is attempting to extend the time before another rehabilitation is required.

24 Based on the narration provided on the completed forms, the carry forwards have been categorised into a number of broad reasons. The next table below shows this breakdown.

Consolidated reason for 2025/2026 proposed carry forwards	$millions	%
Multi-year expenditure made up of: • *Mult-year capital and operational expenditure projects - $13.7 million* • *Multi-year operational expenditure - $1.0 million*	14.7	69%
Projects in consultation or consenting phase	2.3	11%
Projects where physical work is expected to begin early in 2025/2026 financial year	1.5	7%
Vehicle renewal	0.9	4%
Projects nearing completion or completed waiting for final invoices	0.8	4%
Projects rescoped or further decision/information required	0.5	2%
Reallocation of surplus budget for alternate use	0.4	2%
Contractor or internal resources availability	0.3	1%
Total	21.4	100%

25 There are 48 multi-year expenditure items ($14.7 million) comprised 69% of the total amount requested to carry forward of $21.4 million to 2025/2026. Roading makes up 40% of the multi-year projects and three waters 33%.

26 The complete breakdown of the proposed carry forward for multi-year expenditures to 2025/2026 by activity is shown in the following table.

Multi-year expenditure	2025/2026 proposed carry forward		2024/2025 carry forward	
Activity	**Items**	**$millions**	**Items**	**$millions**
Community leadership	**1**	**0.1**	**-**	**-**
Community resources	**7**	**1.1**	**2**	**5.3**
Parks and reserves	6	0.8	1	0.1
Offices and buildings	1	0.3	1	5.2
Corporate services	**2**	**0.9**	**1**	**0.1**
Environmental services	**2**	**0.2**	**-**	**-**
Sewerage	**7**	**2.5**	**5**	**1.3**
Stormwater	**2**	**1.4**	**1**	**-**
Transport	**23**	**7.5**	**10**	**-**
Roading	19	5.8	6	-
Others	4	1.7	4	-
Water supply	**4**	**1.0**	**3**	**1.1**
Total	**48**	**14.7**	**22**	**7.8**

27 Please note in Attachments A-K, where the actual amount spent on a project in 2024/2025 was higher than the remaining budget available, a negative amount has been included to reflect the fact that the higher expenditure in 2024/2025 will need to be funded from within the existing 2025/2026 budget. There are seven negative amounts being carried back of which four are multi-year projects, and the other three relates to bulk purchase of speed signs in 2024/2025, which are scheduled for installation in 2025/2026.

Issues

28 Budgets carried forward into the next financial year or carried back from the next financial year are considered to be unbudgeted in the 2025/2026 year. As such approval is required from Council to undertake the work.

29 The proposed carry forwards include a mix of operational and capital expenditure and, if approved, will increase the work programme expected to be delivered over and above what was allowed for in the Annual Plan for 2025/2026 and the previously approved unbudgeted expenditure reports.

Revised overall work programme for projects

30 Of the total proposed 2025/2026 carry forwards of $21.4 million, $18.7 million relates to carry forwards which are for projects categorised as capital and operational expenditures and formed part of the 2024/2025 project work programme. The following table provides a breakdown on these categories.

- capital expenditure projects - carry forwards which are tracked as projects as part of project work programme which are capital in nature (refer to attachments A and B).
- operational expenditure projects – carry forwards which are tracked as projects as part of project work programme which are classified as operational in nature (refer to attachments C and D).
- capital expenditure - carry forwards which are not tracked as projects and are not part of the project work programme, however they are tracked as capital expenditure due to their nature (refer to attachments E and H).
- operational expenditure - carry forwards which are not tracked as projects and are not part of the programme work programme, however they are tracked as operational expenditure due to their nature (refer to attachments F and G).

Carry forward breakdown	2025/2026 (proposed) $millions	2024/2025 $millions
Capital expenditure- projects	15.8	10.4
Operational expenditure-projects	2.9	0.5
Capital expenditure (includes vehicle renewal of $0.9m)	1.0	1.1
Operational expenditure	1.7	1.1
Total carry forward	**21.4**	**13.1**

31 The figures below show the carry forward effect on the current 2025/2026 project programme.

Revised total work programme for 2025/2026	$
Projects approved for 2025/2026 as part of adoption of 2025/2026 Annual Plan:	
Roading	30,753,157
Other projects	39,787,661
Current work programme for 2025/2026	**70,540,818**
Carry forward project requests for 2025/2026 (as outlined in this report):	
Roading	5,297,227
Other projects	13,443,890
Carry forward project requests for 2025/2026	**18,741,117**
Revised total work programme for 2025/2026	**89,281,935**

32 The implications of the proposed carry forwards for the overall work programme for 2025/2026 is considered in the report "capital delivery programme update – June 2025" taken to Finance and Assurance Committee on 27 August 2025.

33 The Capital Programme Delivery Governance Group reviews the work programme for the year along with what has been delivered on a monthly basis. This group has now been in place for over a year and is continuing to look at ways to manage the risks of delivering the programme.

Factors to consider

Legal and Statutory requirements

34 Section 32 of the Local Government Act 2002 requires Council to approve the purchase or disposal of assets where it is not in accordance with the Long Term Plan. A number of the items proposed to be carried forward relate to expenditure on assets and therefore require Council's approval.

Community views

35 All projects discussed in this report have been consulted on as part of the Annual Plan, Long Term Plan or as unbudgeted expenditure when they were originally budgeted to occur. Communities are informed via the community board throughout the year on the status of projects. The community board also receive year end reports which include the carry forward detail relating to their area from the information in.

Costs and funding

36 All budgets being requested to be carried forward have previously been approved by Council and in total have not changed as part of the carry forward process. The approval from Council may have been by inclusion in the 2024/2034 Long Term Plan, approved as a carried forward project from prior years or approval for unbudgeted expenditure during the year.

37 Operational carry forwards will impact on the balanced budget for 2025/2026. This is due to the relevant income being received in 2024/2025 and being used from reserves during 2025/2026.

38 Generally, work is expected to be delivered within the existing budgets. However, for projects which will require additional funds, these will be requested through normal processes.

39 If projects were to be funded from rates, the unspent rates will be retained in a relevant reserve and are able to be utilised to fund the project costs when these are incurred. If a project is to be funded by a loan or reserves, the draw down does not take place until the actual costs are incurred.

Policy implications

40 There are no policy implications of this report given that Council will be asked to approve the carry forwards and associated expenditure which will then form part of the approved budgets for the 2025/2026 year.

Analysis

Options considered

41 Council has the discretion to approve or decline individually or in aggregate, the proposed carry forward budgets.

42 It is assumed, in regard to the options below, that Council will approve the carry forward of projects that have already begun and where operational expenditure has already been committed.

Analysis of options

Option 1 – Approve all expenditure and income to be carried forward (as per attachments A-K)

Advantages	*Disadvantages*
• enables projects and operational expenditure to be completed/undertaken although later than originally planned.	• risk that Council won't have sufficient resources to complete projects on top of the programme adopted as part of Annual Plan for 2025/2026. • risk that costs will increase as a result of the delay/deferral in undertaking the project.

Option 2 – Approval of selected expenditure only

43 Council can choose to carry forward selected items, however in doing so Council will need consider what items should be carried forward and why and/or whether there are a set of principles that should be applied across all items to ensure consistency. Attachments A-K provides more detail about the types of expenditure (capital, operating) and the reasons.

Advantages	*Disadvantages*
• selected expenditure and projects can be undertaken, although later than originally planned • minimising risk associates with having sufficient resources to complete projects on top of the programme adopted as part of Annual Plan for 2025/2026.	• projects originally planned do not get completed or undertaken (when they have not commenced). This may have flow-on implications for levels of service or community expectations • risk of costs increasing as a result of the delay/deferral (noting that managers have indicated that any cost increases are unlikely to be significant at this stage) • Council may have collected rates for work that will no longer be done.

Option 3 –Approval of project expenditure (operational and capital) but decline all other expenditure

44 Only projects budgeted in 2025/2026 or already started in 2024/2025 will be undertaken.

Advantages	*Disadvantages*
• Council's priorities may have changed enabling funds set aside for these being re-directed as appropriate • minimises risk associated with having insufficient resources to complete	• projects originally planned do not get completed or undertaken (when they have not commenced). This may have flow-on implications for levels of service or community expectations

projects on top of the Annual Plan programme.	• Council may have collected rates for work that will no longer be done • operational commitments will have to be broken.

Assessment of significance

45 When considering the factors to assess in the Significance and Engagement Policy, the carry forwards in this report are not deemed significant.

46 When assessing significance, consideration has been given to the impact and consequences of the items being carried forward on the future of the district, people who are likely to be particularly interested in the items and the capacity of Council to perform its role.

47 The majority of the items have been consulted on in the 2024-2034 Long Term Plan process and Annual Plans, or are unbudgeted expenditure specifically approved during the year by Council. Individually or in aggregate the items do not have a significant impact on any one community or the whole district or the level of services in any one activity.

Recommended option

48 Option 1 – Approve all income and expenditure (as outlined in Attachments A-K) to be carried forward.

Next steps

49 Action Council's recommendation, including amending financial forecasts for projects approved to be carried forward and advising Council staff and communities of projects approved to be carried forward.

50 Staff will update the 2025/2026 financial projections if approved by Council.

Attachments

A Attachment A - Capital Expenditure Projects ⇩
B Attachment B - Multi-Year Capital Expenditure Projects ⇩
C Attachment C - Operational Expenditure Projects ⇩
D Attachment D - Multi- Year Operational Expenditure Projects ⇩
E Attachment E - Capital Expenditure ⇩
F Attachment F - Operational Expenditure ⇩
G Attachment G - Multi-Year Operational Expenditure ⇩
H Attachment H - Vehicle Renewals ⇩
I Attachment I - Alternate Use Funded by Grants ⇩
J Attachment J - Alternate Use ⇩
K Attachment K - To be included in the 2026/2027 Annual Plan ⇩

Attachment A:
Capital expenditure projects of $3,092,805 to be carried forward or (brought back from) the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Resources	District wide - library refurbishment	Loan	This project spans multiple sites and involves both operational and capital expenditure considerations. The initial scope was high-level, requiring detailed planning to align with budget constraints. Extensive consultation with staff and management has been necessary.	123,600
Community Resources	Tuatapere Half Mile Road playground toilet	Loan	Project was delayed due to building consent process.	176,336
Community Resources	Te Anau Lions Park toilet - refurbishment	Loan	The project was delayed due to the timing of budget reallocation and awarding of the tender. The tender has been awarded, and the refurbishment work has commenced in July 2025.	431,607
Community Resources	Athol toilet - renewal	Loan	The toilet has been completed and is currently under the defects liability period, which expires in April 2026. The final completion certificate will be issued thereafter, and the Contractor to Engineer fees will be paid accordingly.	3,476
Community Resources	District wide - toilets renewal preparation	Loan	The budget was allocated for the replacement of the Tokanui toilet, which will be replaced with a Norski toilet. This project is now scheduled to be completed in 2025/2026 financial year with a six-week delivery turn around.	20,000
Community Resources	District wide - toilets renewal construction	Loan	This project is for Garston toilet renewal and had delays in acquiring access to a permanent water supply. This is now scheduled for completion in the 2025/2026 financial year.	100,000
Community Resources	Monkey Island - shelter area development (stage 2)	Loan	At Council's request, the project has gone back for community consultation. The scope of the project is yet to be defined, and a report is to be tabled at Council before any work can commence.	86,810
Community Resources	Waikiwi yard - remove hedges and build new fences	Loan	Quotes for hedge removal and fencing have been received, all exceeding the current budget. Additional funding will be required for the project to proceed.	38,513
Community Resources	Te Anau recycling container relocation	Loan	The project could not be completed in 2024/2025 financial year. The work was completed in July 2025 and is currently pending invoicing for payment.	25,302
Community Resources	Balfour hall re-roofing	Loan	This project is at the contract award stage, with works potentially commencing in August and completed by October 2025.	120,000
Community Resources	Manapouri turbine sign	Grant and Reserves	Pending final approval of the sign wording.	15,000
Community Resources	Mossburn toilet renewal	Loan	Toilet refurbishment commenced in June 2025 and is scheduled for completion within three months.	330,520
Community Resources	Purchase land to increase size of Riverton cemetery	Loan and Reserves	On going discussions to acquire land for expansion.	225,836
Community Resources	Purchase and relocation of Paua Shell	Reserves	Refurbishment of the Paua Shell surface is required to be undertaken when the preferred finish is confirmed.	1,094
Community Resources	Riverton estuary planting	Loan	Staff has identified an alternative solution and planting will occur in 2025/2026 financial year.	20,000
Community Resources	Walking track along Horsehoe Road to Butterfield beach	Grants	Change of scope has been finalised, shoulder widening work has been completed in 2024/2025 financial year. Awaiting on contractor availability in order to complete remaining work.	58,200

Attachment A:
Capital expenditure projects of $3,092,805 to be carried forward or (brought back from) the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Resources	Te Anau Lions Park playground equipment renewal	Loan and Reserves	The contractor asked for an extension of time due to the adverse weather that has been encountered. The best time to sow grass seed is early to mid-spring.	164,829
Community Resources	Tuatapere domain gate	Reserve	The domain gate was put on hold by a decision of the community board while they await the potential signing of the new roading bylaw before making the decision regarding the installation location.	5,819
Community Resources	Tuatapere historic railway station	Grants	This project is being managed by a trust. The funding is allocated based on agreed milestones within the contract that council has with the trust.	79,554
Community Resources	Wallacetown recreational project	Grant and Reserves	Trees have been removed, the storm water drainage has been completed in the winter, however the physical works of the jump track cannot be done until after winter. The design for the upgrade of the jump track is currently being undertaken.	73,643
Community Resources	Winton install CCTV	Reserves	Carry forward required for the delivery of the project in 2025/2026 financial year.	65,000
Community Resources	Winton Great North Road development	Reserves	The project scope is to be determined by the community board.	20,000
Community Resources	Woodlands interpretation panels	Reserves	Awaiting historical information from the community.	10,000
Community Resources	Wyndham camping ground construction	Loan	Work to tidy up the camping ground has been carried out and the upgrade to the showers is all that remains to be completed. A decision on the future of the camping ground will be determine whether this work will be undertaken.	3,058
Corporate Services	Starlink - Stewart Island offices and pavilion	Reserves	The connectivity part of the project has been completed, which included the starlink installation and Wifi access to the Council network from the pavilion. Testing has identified a need for acoustic treatment to enhance video conferencing capabilities. These enhancements will support reliable remote communication, reducing the need for staff to travel to the island.	3,309
Sewerage	Stewart Island wastewater consent renewal	District Funding	Staff are working through the final stages of consent conditions with Environment Southland, requiring to undertake additional treatment product sampling. It is estimated that the consent will be issued in late 2025.	41,610
Stormwater	Te Anau stormwater upgrade	District Funding	Options assessment for stormwater solutions for the Te Anau township has been undertaken and currently discussions are underway over a possible land purchase for the proposed stormwater retention. Work will continue in the 2025/2026 financial year.	61,792
Transport	Improve around the mountain cycle trail experience (easements)	Loan	Delayed due to the ongoing discussions with landowners in relation to finalisation of the cycle trail easements agreement.	23,681
Transport	Around the mountain cycle trail improvements	Loan	Capital improvements for Around the Mountains Cycle Trail were not utilised in 2024/2025, however this will be needed in 2025/2026.	20,000

Attachment A:
Capital expenditure projects of $3,092,805 to be carried forward or (brought back from) the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Transport	Edendale - speed feedback sign at Ferry Road	Reserves	Due to late Long Term Plan sign off, deliberation by the community board on the needed location for the signs and 12-16 week procurement lead time resulted in purchased signs delivered in late June. The remaining budget is required to be carried forward for installation.	9,772
Transport	Wyndham - speed feedback sign at Ferry Road	Reserves	Due to late Long Term Plan sign off, deliberation by the community board on the needed location for the signs and 12-16 week procurement lead time resulted in purchased signs delivered in late June. The remaining budget is required to be carried forward for installation.	9,772
Transport	Wyndham - speed feedback sign at Wyndham Road	Loan and Reserves	Due to late Long Term Plan sign off, deliberation by the community board on the needed location for the signs and 12-16 week procurement lead time resulted in purchased signs delivered in late June. The remaining budget is required to be carried forward for installation.	9,772
Transport	Edendale - speed feedback sign at Seaward Road	Loan	Due to late Long Term Plan sign off, deliberation by the community board on the needed location for the signs and 12-16 week procurement lead time resulted in purchased signs delivered in late June. The remaining budget is required to be carried forward for installation.	9,772
Transport	Wyndham - speed feedback sign at Wyndham Letterbox Road	Loan	Due to late Long Term Plan sign off, deliberation by the community board on the needed location for the signs and 12-16 week procurement lead time resulted in purchased signs delivered in late June. The remaining budget is required to be carried forward for installation.	9,772
Transport	Manapouri - sealing of footpath opposite the church and shop on Waiau Street	Loan	Due to late Long Term Plan sign off and decisions of the use of the funds by the community board to seal the carparks on Waiua Street instead of renewing footpaths in Manapouri, the project reached 99% completion at the end of the sealing season. Final sweep and edge seal marking reinstatement work will be completed after winter season.	9,800
Transport	Riverton Richard Street walking track	Loan	Adverse weather conditions prevented grass seeding before the financial year end.	1,841
Transport	Golden Bay walkway investigation	Grants	Work has been completed but has not been invoiced.	73,714
Transport	Te Anau - construction of pedestrian facilities on Sandy Brown Road	Development Contribution	Location and positioning for the works is being reviewed, wider discussions have identified a more holistic approach to road is required. Full review of the area is currently being carried out.	95,431
Transport	Tokanui Niagara highway speed sign	Loan	Signs were purchased as one bulk with installation scheduled in 2025/2026.	(10,228)
Transport	Tokanui Gorge Road highway speed sign	Loan	Signs were purchased as one bulk with installation scheduled in 2025/2026.	(10,228)
Transport	Woodlands speed signs	Loan	Signs were purchased as one bulk with installation scheduled in 2025/2026.	(10,228)
Water Supply	Manapouri water treatment plant - turbidity upgrade	District Funding	With the new water treatment plant operating reliably for six months, some residual old water treatment plant abandonment work remains outstanding.	30,288

Attachment A:
Capital expenditure projects of $3,092,805 to be carried forward or (brought back from) the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Water Supply	Mossburn water supply consent renewal preparation	District Funding	Staff will complete and submit the consent application to Environment Southland in late 2025.	26,477
Water Supply	Te Anau rural water scheme audit inspections	Loan	This project has been completed in late June 2025, but final costs need to be evaluated and assigned to the project in August 2025.	192,628
Water Supply	Te Anau rural water - Takitimu scheme	Loan	Work commenced in 2024/2025 financial year, however delays were due to land access agreements which is currently in final stages of approval. Work is expected to be completed in late 2025.	203,297
Water Supply	Te Anau rural water - Takitimu consent renewal	Loan	The consent application process will be completed and submitted to Environment Southland in the later part of 2025 by staff.	50,086
Water Supply	Tuatapere water supply ultraviolet system replacement	District Funding	This project is to complete drinking water compliance with the drinking water standards, hardware was ordered early 2025, with a 6 month delivery period. This project will be completed in late 2025.	42,479

Attachment B:
Capital expenditure multi-year projects of $12,559,862 to be carried forward or (brought back from) the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Resources	Invercargill building replacement	Loan	Multi-year project currently in the design phase.	319,400
Community Resources	Nightcaps - development of Mcgregor park	Loan and Reserves	Scope was confirmed in March 2025. Upon engaging the market, feedback indicated suppliers were unavailable at that time, with winter identified as the optimal period to release the tender. The tender will be closing at the end of August, with installation scheduled for completion by mid-December 2025.	96,017
Community Resources	Riverton Taramea Bay playground equipment replacement	Grant, Loan and Reserves	This is a multi year project. Stage 1 has been completed. Stage 2 is to commence in 2025/2026 financial year.	276,398
Community Resources	Riverton riparian planting	Loan	Staff has identified alternative solution and planting will occur in 2025/2026 financial year.	5,000
Community Resources	Te Anau basin development	Loan	This project has gone back out for community consultation at the request of the community board. Community feedback has been received and the community board are considering the feedback prior to defining the scope of work.	55,463
Community Resources	Otautau war memorial replacement	Loan	Budget will be utilised in 2025/2026 financial year during physical repairs.	13,863
Community Resources	Camping ground in Otautau (Holt Park)	Grant and Reserves	This is a muti year project with completion expected in 2025/2026 financial year.	324,135
Sewerage	District wide - wastewater main reticulation network renewals	Loan	Council progressed key projects in Winton throughout 2024/2025 financial year, while also advancing designs for initiatives scheduled for 2025/2026 financial year and beyond.	590,057
Sewerage	Manapouri wastewater treatment upgrade	District Funding	This project has been designed and procured in the 2024/2025 financial year, with construction due to begin in late 2025.	858,447
Sewerage	Nightcaps wastewater treatment upgrade	District Funding	This multi-year project is currently on hold pending finalisation of the wastewater standard, expected in September 2025.	189,824
Sewerage	Preparing consent renewal for Winton scheme	District Funding	The consent application process will be completed and submitted to Environment Southland in the later part of 2025. This carry forward will enable future consent application testing.	50,513
Sewerage	Inflow and infiltration investigation to sewer networks at various sites	District Funding	The project is in its final designing stage for work to be undertaken in the 2025/2026 construction period.	250,000
Sewerage	Edendale/Wyndham wastewater plant consent renewal and upgrade	District Funding	This project is a multi year project and is currently on hold pending the finalisation of the wastewater standard due in September 2025.	244,957
Stormwater	Wyndham stormwater replacement	District Funding	This project has been designed and procured in the 2024/2025 financial year, with construction due to begin in November 2025.	1,018,314
Stormwater	Lumsden stormwater catchment investigation and improvement work	District Funding	Design options have been worked through with the consulting engineers, construction is planned to be undertaken in 2025/2026 financial year.	395,122
Transport	District wide - bridge programme 2024-2034	NZTA and Roading Reserve	The estimated amount for pre-construction and procurement initiation work was slightly higher than required in order to enable alignment with budget from NZTA.	157,425
Transport	District wide-unsealed road renewal programme 2024-2034	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	256,089

Attachment B:
Capital expenditure multi-year projects of $12,559,862 to be carried forward or (brought back from) the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Transport	District wide - resurfacing programme 2024-2034	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	(109,890)
Transport	District wide - drainage renewal programme 2024-2034-level of service	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	34,454
Transport	District wide - drainage renewal programme 2024-2034	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	588,439
Transport	District wide - pavement rehabilitation programme 2024-2034	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA. Due to late start following final budget approval, progress has lagged this season. Additionally, requesting a transfer of $1,000,000 to the resurfacing programme FROAD003A to support a more expensive treatment in an attempt to extend the time before a rehabilitation is required.	2,711,352
Transport	District wide - structure component renewal programme 2024-2034	NZTA and Roading Reserve	As a result of changes in NZTA funding, consideration is to be given on how to ensure one large replacement is to take place before starting with any other structure replacements. Carry forward is required in order to enable alignment with budgets from NZTA.	533,181
Transport	District wide - traffic services programme 2024-2034-level of service	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	107,410
Transport	District wide - traffic services programme 2024-2034	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	96,949
Transport	District wide - roading resilience programme 2024-2034	NZTA and Roading Reserve	NZTA provided budget approval for work under the Crown resilient funding. Work on Stewart Island has been approved for completion but have yet to approve any work on the remainder of the district. This is to enable alignment with budgets from NZTA.	921,818
Transport	Riverton T Wharf replacement	Loan and Reserves	With the change in project scope, the remedial maintenance is now to be undertaken on the existing T-Wharf.	200,000
Transport	Ulva Island Jetty rebuild	Grant and Reserves	After extensive consultation, the community board have decided to rebuild the Jetty. Concept design has now been completed and awaiting a final design to allow for procurement process to begin. Construction is expected to be completed in 2026.	582,817
Transport	Runway surface	Loan	The pre seal dig outs have been done in May 2025 and the resurfacing will be happening during the optimal climatic conditions with consideration on funding constraints.	818,845
Water Supply	Multi scheme AC water main reticulation pipe - early replacement of asbestos cement	Loan	Council progressed key projects during 2024/2025 financial year while advancing design work for initiatives planned in 2025/2026 financial year and beyond. A number of projects are scheduled for delivery in 2025/2026 financial year, including the Te Anau water main renewal, which begins in August 2025.	804,903
Water Supply	Ohai/Nightcaps Wairio water plant tank replacement	District Funding	The remaining project work is scheduled for the 2025/2026 construction period.	59,921
Water Supply	Riverton new water treatment plant	District Funding	This project is currently undergoing a peer review of design due to the water chemistry complexities, it is expected this process will be completed in September 2025 and procurement could be undertaken early 2026.	56,889
Water Supply	Mt York rural water consent renewal	Loan	The consent application process will be completed and submitted to Environment Southland in the later part of 2025 by staff.	51,750

Attachment C:
Operational expenditure projects of $1,560,215 to be carried forward into the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Resources	Acquisition of new cemetery management software	Loan	To cover potential costs now project is being undertaken internally.	55,284
Community Resources	Waikiwi yard options analysis	Loan	This piece of work was going to be done internally. Staff have canvassed other departments for their input before finalising the report. No costs have been incurred to dated.	10,000
Community Resources	Community housing - 56 Seaward Road repairs	Loan	Staff are waiting for a revised quote to carry out the work.	27,112
Community Resources	Solid waste- Otautau closed landfill protection works	Loan	Applying for Ministry for the Environment funding to assist in this project. Results from this application will be known in coming months.	1,080,200
Community Resources	Balfour Kruger Street subdivision investigation	Loan	Currently in process of reviewing quotes to undertake this work. Work expected to be carried out in 2025/2026 financial year.	47,845
Community Resources	Dipton repair or replace access foot bridge	Reserves	The bridge has no building consent or certified design. The budget of $10,000 is not enough to complete a design and replace the bridge. The community board have decided to ask for a cost to design a new bridge to allow a new bridge to be constructed at a later date. We are currently waiting on cost for a design. This budget needs to be carried forward to pay for the design.	10,000
Community Resources	Manapouri hall exterior repaint	Loans and Reserves	Painting works were ceased due to the discovery of asbestos materials associated with the painting scope, just before winter. The works are scheduled to resume in spring and are expected to be completed by October 2025.	72,021
Community Resources	Riverton harbour refurbishment	Rates	Not completed due to staffing constraints	10,000
Community Resources	Curio Bay reserve management plan	Loan	This is for the Curio Bay master plan. There is still work to be completed on this plan and the remaining budget need to be carried forward.	8,796
Community Resources	Tuatapere library exterior repaints	Reserves	A contract for the work was issued towards the end of the financial year. Unforeseen issues were identified during the initial part of the project that needed to be addressed that delayed the completion of the work. No costs have been received prior to the end of June.	20,000
Community Resources	Otautau concept plan for new playground	Reserves	This project was packaged with similar projects for Otautau, Tokanui and Wyndham with the total cost of the work coming under budget. The concept plans are being developed but have not been completed or approved by the community boards. The remaining budget will be carried forward and be incorporated into the delivery of the new playground.	8,250
Community Resources	Winton RSA hall interior refurbishment	Reserves	Original tender was unable to be awarded, scope of work to be revised and re-tendered.	40,000
Community Resources	Wyndham museum sale/demolition	Reserves	The original budget was insufficient and an unbudgeted expenditure request was approved in December 2024. By the time procurement and contract was awarded, there was insufficient time to complete the physical contract works before 2024/2025 financial year.	100,911
Corporate Services	District wide - ongoing digitisation	Loan	This project was stalled awaiting business case development for archives business case which is currently underway to facilitate the digitisation of the remaining property records in physical archives. This budget will be to facilitate the purchase of scanning equipment and software for targeted scanning.	43,000
Transport	Stewart Island wharves - refurbishment Millers beach	Loan	This work was put on hold by the community board until a decision regarding Ulva Island Wharf replacement has been made. Staff are packaging this work with Ulva Island and Golden Bay repairs. This will allow all the Wharf repairs on Stewart Island to be completed in one establishment which will substantially reduce cost across three projects.	26,796

Attachment D:
Operational expenditure multi-year projects of $1,182,916 to be carried forward into the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Corporate Services	District wide - archives business case	Loan	Information is being gathered for construction of a business case that is being developed internally and awaiting on another vendor for costs and possible other ideas around approach. It is expected that these funds will be used to help develop the business case along with contributing to the overall project costs.	100,000
Corporate Services	District wide - core system replacement	Loan	After pausing the project in FY22/23 a decision was made in 2024 to continue with the datascape FMIS part of the core systems project. The carry forward is required to ensure that the project is completed to planned timeframes. This will be used by the project for vendor, system and hosting costs both financial management information system and payroll aspects of the project. For the human resource information management system (payroll) a product/vendor has not been selected yet.	757,814
Sewerage	Stewart Island wastewater oxidation pond desludging	District Funding	The project was postponed by amical agreement between the Contractor and Council due to construction delays and the pending winter weather. It is expected construction will recommence late 2025, early 2026 but will be weather dependant, with completion planned for 2026.	325,102

Attachment E:
Capital expenditure of $108,858 to be carried forward into the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Resources	Book bus	Loan	Following the arrival of the Book Bus on site, a number of items have been identified that require completion to ensure the vehicle is fully operational and compliant with health and safety standards. Carry forward is for remaining budget to address the following: -completion of IT equipment installation and setup -health and safety modifications to door and footwell areas.	10,973
Corporate Services	Portable visual display boards	Loan	The hardware was purchased in early 2025 and has arrived in New Zealand, with delivery expected in August.	76,000
Transport	Halfmoon Bay wharf investigation	Reserves	This project is in progress and not yet concluded.	21,885

Attachment F:
Operational expenditure of $699,116 to be carried forward into the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Leadership	Southland local government structural opportunity	Reserves	This work is in progress and not yet concluded.	25,650
Community Leadership	Milford opportunities project	Grant	Due to the number of community submissions, the time to review and procure a masterplan for Te Anau Lakefront has taken longer than expected.	34,269
Community Leadership	Lumsden museum redevelopment	Grant	Uncertainty over how to deliver project and who will undertake the work has prevented progress to date but now on a path to completing the project.	50,000
Community Leadership	Doctors Square - better off funding	Grant	The interpretation panels are currently being designed and waiting on quote to complete the Doctors Square project. As this was a better off funding project the community board would like to apply for the excess funds to go to another local projects.	38,281
Community Leadership	Legal costs for judicial review	Reserves	The court of appeal judgement came out in July 2025 (it was anticipated in the 2024/2025 financial year). There will be legal costs associated with summarising the judgement, the payment of costs between parties.	18,227
Community Leadership	Riverton RSA Thornbury memorial project	Reserves	This is a contribution to the RSA for a project that Council graphics is supporting. The grant hasn't been paid out as the graphics are working on the draft to see if the project can be achieved.	3,543
Community Resources	Dipton tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	4,000
Community Resources	Edendale Wyndham tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	5,720
Community Resources	Garston tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	4,460
Community Resources	Mossburn tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	3,094
Community Resources	Ohai tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	5,207
Community Resources	Orepuki tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	6,000
Community Resources	Riverton tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	12,460

Attachment F:
Operational expenditure of $699,116 to be carried forward into the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Resources	Tuatapere tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	3,739
Community Resources	Otautau tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	23,263
Community Resources	Wallacetown tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	4,764
Community Resources	Winton tree and hedge	Reserves	Tree programme was delayed due to late long term plan sign off. Additional work associated with trees are under powerlines which has been identified by the contractor while undertaking work in the town.	12,178
Corporate Services	Democracy & communication general projects	Reserves	Work on the Nightcaps mine future use is ongoing with due diligence work planned for 2025/2026 financial year.	30,409
Corporate Services	Internal audit programme	Reserves	Internal audit programme commencing in August 2025.	29,000
Corporate Services	Stewart Island Rakiura renewable energy	Grant	The final costs to be determined in 2025/2026 financial year therefore remaining budget needs to be carried forward.	65,726
Corporate Services	Strategy and partnership general projects	Reserves	Some of the communications and governance projects were undertaken but not to the extent envisioned due to resourcing issues and also it was considered prudent to wait for the new triennium to undertake some of the work. The budget required to undertake projects in governance and communications.	154,000
Corporate Services	Project delivery - better off funding	Reserves	The staff delivery component of the better off funding projects. These projects are scheduled for completion through until December 2026 and remaining budget is required for the future projects.	39,127
Environmental Services	Building controls general projects	Loan	The existing GoGet system used for building control authority functions is now at the end of its lifecycle and is no longer supported. A decision on its replacement has been deferred until later of 2025 to allow time for emerging market competitors to fully develop their system. This approach ensures we can make a well informed decision based on the best available functionality and value.	100,000
Transport	Road Safety Southland general projects	NZTA and Roading Reserve	Invoicing not received in relation to the learning to cycle safely programme delivered externally. This is to enable alignment with budgets from NZTA.	26,000

Attachment G:
Multi-year operational expenditure of $988,059 to be carried forward or (brought back from) into the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Leadership	Three waters and spatial planning	Grant	This work is linked to the ongoing local water done well work programme and the growing southland townships better off funding project which are still being undertaken.	133,013
Environmental Services	Resource planning plan changes	Reserves	The carry over is due to unspent funds for planning consultants, hearings and legal support. The pace and extent of legislative change in resource management has led to a pause in starting new plan change processed and this has now been validated by the introduction of the proposed "plan-stop" amendment to the RMA.	124,327
Environmental Services	Future township spatial planning	Grant	This work was paused until better off funding was secured under the new criteria in September 2024. A guidance report to help set up the project was received in December 2024. The project began in February 2025 with an initial setup phase nearly complete and two of the community spatial plans are underway. Procurement for technical expertise is underway with the aim for contracts to be in place by the end of August 2025.	107,364
Transport	Sealed pavement maintenance	NZTA and Roading Reserve	Additional work completed as part of pre-seal repairs for Stewart Island. This is to enable alignment with budgets from NZTA.	(141,173)
Transport	Unsealed pavement maintenance	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	350,773
Transport	Routine drainage maintenance	NZTA and Roading Reserve	Additional work completed as part of pre-seal repairs for Stewart Island. This is to enable alignment with budgets from NZTA.	(296,100)
Transport	Structures maintenance	NZTA and Roading Reserve	The change in NZTA funding in relation to structure replacement has required consideration of how to ensure best use of funds across all structure component work. This is to enable alignment with budgets from NZTA.	272,979
Transport	Environmental maintenance	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	(62,764)
Transport	Traffic services maintenance	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	28,817
Transport	Level crossing maintenance	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	3,876
Transport	Network and asset management	NZTA and Roading Reserve	Moving funds not spent in 2024/2025 to ensure alignment with budgets from NZTA	229,060
Transport	Maintenance of the Lower Hollyford Road	NZTA and Roading Reserve	Work is only completed on the Lower Hollyford road as required; with limited maintenance invoiced during 2024/2025. This is to enable alignment with budgets from NZTA.	84,227
Transport	Te Anau Airport Manapouri review stage 2	Reserves	Review has been underway since early this year and is expected to be completed in December 2025. The budget was spilt between 2024/2025 and 2025/2026 however the contractor has indicated that no interim invoicing is required.	153,660

Attachment H:
Vehicle renewals of $862,500 to be carried forward into the 2025/2026 financial year

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Corporate Services	Replacement of 23 vehicles	Reserves	Vehicles not yet replaced	1,150,000
Corporate Services	Proceed from sale of 23 vehicles	Reserves	Vehicles not yet replaced	(287,500)

Attachment I:
Budget of $39,442 to be carried forward into the 2025/2026 financial year for an alternate use which are funded by grants

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Leadership	Stewart Island Rakiura community partnership fund	Grant	Unspent funds for the Community Partnership Fund.	1,211
Community Resources	Athol tennis court resurface	Grant	The remaining budget from the Athol tennis court resurfacing will be allocated to the Garston bbq project.	1,938
Community Resources	Colac Bay beach access steps	Grant	The budget will be allocated to the Taramea Bay stage 1 project for the installation of a seesaw.	4,900
Community Resources	Nightcaps to Ohai railway walking track	Grant	Remaining budget from Nightcaps to Ohai walking track project will be utilised for new pump track in Nightcaps.	2,761
Community Resources	Ryal Bush community centre re-roof	Grant	Re-roofing has been completed, community board has proposed to utilise remaining budget to carry out additional miscellaneous repair works in 2025/2026 financial year.	25,870
Corporate Services	Mcgregor park masterplan	Grant	Remaining budget from Mcgregor park masterplan to be utilised for new pump track in Nightcaps and Mcgregor park.	2,761

Attachment J:
Budget of $354,005 to be carried forward into the 2025/2026 financial year and used alternative projects

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Resources	Structural planting of areas at Curio Bay, Slope Point and Colac Bay	Grant and Loan	The remaining budget is for the planting of the areas at Curio Bay, Slope Point and Colac Bay.	38,314
Community Resources	Edendale recreation reserve playground equipment renewal	Loan	Additional nature play items to be purchased and installed to complete the playspace.	2,855
Community Resources	Te Anau Henry Street playground	Loan	This project was completed under budget. The remainder of the budget will be utilised towards Te Anau Lions Park playground upgrade.	12,519
Community Resources	District Wide - toilets refurbishment of four toilets	Loan	Refurbishment of the four toilets were completed. A portion of the remaining budget ($60,000) will need to be utilised for Tuatapere Half Mile Road toilet project for the installation of the carpark. The remainder being allocated to the Tuatapere Main Street toilet project to provide funding for an additional plan at the toilet.	146,478
Community Resources	Tuatapere community housing exterior repairs	Loan	This work was completed under budget and the remaining balance will be allocated towards refurbishment of the community housing unit at 56 Seaward Road, Edendale.	66,915
Community Resources	Community housing interior repaint five units	Loan	The remainder of this budget is being carried forward to be used on the internal refurbishment of the unit at 56 Seaward Road, Edendale.	20,011
Community Resources	District refuse close landfills	Loan	This budget was previously carried forward to allow for additional closed landfill sampling to occur. This sampling was largely completed with the existing budget. It is recommended to carry the remainder of this budget forward to the Otautau Closed landfill project to increase contingency.	46,917
Transport	Waikaia additional streetlights	Loan and Reserves	Initial works completed, currently determining if there is enough remaining budget to install solar light at Riversdale-Waikaia Rd and Willington intersection.	19,996

Attachment K:
Expenditure of $14,300 to be included in the 2026/2027 Annual Plan

Category/ Activity	Project Name	Source of funding	Carry Forward Explanation for Council Report	Amount ($)
Community Resources	Colac Bay Manuka Street playground equipment replacement	Loan	This work has not been completed as the playground is not on council land. The community board have indicated that the focus will be on the playground along the foreshore. The project is pushed to the Annual Plan of 2026/2027due to slow progress with the land ownership.	5,150
Community Resources	Tuatapere concept design for Memorial park	Reserves	This project was packaged with similar projects for Otautau, Tokanui and Wyndham with the total cost of the work coming under budget. The concept plans are being developed but have not been completed or approved by the community boards. The remaining budget will be carried forward and be incorporated into the delivery of the new playground.	9,150

Mayor's report

Record no: R/25/8/38589
Author: Fiona Dunlop, Committee advisor
Approved by: Vibhuti Chopra, Group Manager Strategy and Partnerships/Acting Chief Executive

☐ Decision ☐ Recommendation ☒ Information

Purpose of report

1 The purpose of the report is for Mayor Scott to report on meetings/events that he has attended during June to mid-August 2025 and for councillors to also provide updates.

Mayor's update

Events or meetings with other organisations/stakeholders

2 Mayor Scott has attended the following events/meetings during mid-April 2025 to the end of May 2025

- 8 – 10 June – Regional airport visits – Taupo, Whakatane and Tauranga
- 12 June – Great South Housing seminar
- 12 June – Monkey Island shelter public meeting
- 13 June – Penny Simmonds meeting
- 18 June – Marie Dickson Community Service Award
- 19 June – Mike McLees Community Service Award
- 19 June – reorganisation debate
- 23 June – Stewart Island/Rakiura Regional Infrastructure Fund announcement
- 26 June – Breakfast meeting with Air New Zealand and Great South
- 27 June – Manapouri water scheme opening
- 27 June – Te Anau bird park meeting with Department of Conservation and stakeholders
- 3 July – Minister Simeon Brown meeting
- 3 July – JD Miller Community Service Award
- 4 July – Te Anau Airport User Group meeting
- 8 July – Rural Health Roadshow, Gore – Minister Doocey & MP Mooney
- 16 – 17 July – LGNZ Super Local conference
- 18 July – New Zealand Deerstalkers Conference opening speaker
- 23 July – Road Controlling Authorities Forum (Online)
- 24 – 26 July Southland Party
- 25 July meetings with the following:
    - Minister Meager
    - Minister Patterson
    - Minister Hoggard
    - Minister Penk
    - Minister McClay

  - Department of Conservation staff
  - Minister Watts staff
- 26 July – Te Hikoi Museum 100 years celebration dinner
- 28 – 29 July – Air New Zealand Mayoral Forum in Auckland
- 1 August – MP Tangi Utikere meeting in Invercargill
- 4 August – Minister Mark Patterson Mayoral Forum
- 4 August – Minister Mark Patterson discussion with Nightcaps Medical Trust
- 7 August – Air New Zealand Business leaders lunch
- 11 August – Local Government New Zealand Transport Forum
- 11 August – Southern Engagement Group Forum for Dunedin Hospital
- 16 August – Coastguard Riverton launch of new boat and shed opening
- 16 August – Te Anau Fire Brigade Honours celebration

Joint committee/committee/subcommittee meetings

3 Mayor Scott has also attended the following formal governance meetings:

- 13 June – Great South Joint Shareholders meeting
- 16 June – Wastenet Advisory meeting
- 22 July – Southland Civil Defence Emergency Management governance workshop
- 7 August – Te Ropu Taiao hui
- 8 August – Great South Joint Shareholder meeting

Councillor updates

Joint committee/committee/subcommittee meetings

4 Councillors may have attended the following formal governance meetings and may wish to provide an update:

- Connected Murihiku Joint Committee (Councillors Sarah Greaney and Darren Frazer)
- Southland Regional Heritage Joint Committee (Deputy Mayor Christine Menzies and Councillor Paul Duffy)
- Southland Regional Land Transport Joint Committee (Deputy Mayor Christine Menzies)

Council organisations

5 Councillors may have attended the following meetings with Council organisations and may wish to provide an update:

- Around the Mountains Cycle Trail Trust (Deputy Mayor Christine Menzies)
- Citizens Advice Bureau (Councillor Julie Keast)
- Creative Communities (Councillor Margie Ruddenklau)
- Gore and Districts Community Counselling Centre Inc. (Councillor Julie Keast)
- Pioneer Women's Memorial Trust (Gore) (Councillor Julie Keast)
- Southland Indoor Leisure Centre Charitable Trust (Councillor Darren Frazer)
- Southland Medical Foundation (Mayor Scott)
- Southland Regional Heritage Building and Preservation Trust (Councillor Paul Duffy and Councillor Margie Ruddenklau as alternate)

- Te Roopu Taiao (Mayor Scott, and both Deputy Mayor Christine Menzies and Councillor Paul Duffy as alternates)
- Tuatapere Amenities Trust (Councillor Jaspreet Boparai)
- Waiau Working Party (Councillor Derek Chamberlain)
- Whakamana te Waituna Trust (Councillor Julie Keast).

Recommendation

That the Council:

a) receives the report titled "Mayor's report".

Attachments

There are no attachments for this report.

Exclusion of the public: Local Government Official Information and Meetings Act 1987

Recommendation

That the public be excluded from the following part(s) of the proceedings of this meeting.

C8.1 Ulva Island wharf replacement

C8.2 Manapouri wastewater treatment plant and pipeline business case and unbudgeted expenditure request

The general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Ground(s) under section 48(1) for the passing of this resolution
Ulva Island wharf replacement	s7(2)(h) - the withholding of the information is necessary to enable the local authority to carry out, without prejudice or disadvantage, commercial activities.	That the public conduct of the whole or the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists.
Manapouri wastewater treatment plant and pipeline business case and unbudgeted expenditure request	s7(2)(i) - the withholding of the information is necessary to enable the local authority to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations).	That the public conduct of the whole or the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding exists.