

Local Alcohol Policy Consultation

Statement of Proposal

Invercargill City Council (Council) invites your submission on the draft new Local Alcohol Policy (LAP) for the Invercargill District. This Consultation Document has been produced to explain the options available to go in the LAP, the evidence and data we have found on each issue, what Council's preferred options are, and the reasons for those preferences.

Council currently has a Combined Local Alcohol Policy (LAP 2019) with Southland District Council (SDC), which was adopted on 6 December 2019 and became operative on 31 March 2020.

Local Alcohol Policies (LAPs) are made under the Sale and Supply of Alcohol Act 2012 (the Act). They are optional tools available to councils to minimise the harms arising for individuals and communities as a consequence of the consumption of alcohol. They can be seen as part of a wider local government approach which may also include alcohol ban areas, licensing fees, and other alcohol-related strategies and initiatives.

Under s.97 of the Act, LAPs have to be reviewed every six years. Last year, Council carried out a thorough review of our current LAP 2019. The review found that the policy is working reasonably well, but there are certain areas which could be improved. During that review it was also agreed that regional differences mean that it would now be beneficial for Invercargill to have its own LAP, rather than the current combined approach with SDC.

Consequently, Council is proposing to adopt a new updated Local Alcohol Policy to come into effect in 2026.

The Act requires councils to have regard to certain specific issues, and to consult with agencies including New Zealand Police, the Medical Officer of Health, and District Licensing Inspectors, when producing a draft LAP. This work has been completed, and in August 2025 Council agreed on a draft LAP for consultation.

It is really important that we hear from our community to make sure that the various options that we propose in the draft are right for Invercargill and Bluff. LAPs help to ensure that local communities have more input into local alcohol licensing decisions. It's important to note that no decisions have been made, your opinions are key to informing the final policy options in the draft LAP.

We invite you to make a submission on the draft LAP, and all the details on how to do that can be found at the end of this document or on the Let's Talk website.



Further detail on the policy options and the results of the research on each topic can be found in the "Local Alcohol Policy – Research Report" which was produced to support the review of the policy.

Summary of proposed changes

Based on the review, the input from stakeholders and the data and evidence for our local community, Council is proposing the below changes to our LAP, more detail is included in the following pages.

- Off-licence trading hours to be reduced to a maximum of 7am to 10pm – this is compared to the current maximum of 7am to 11pm.
- Amend the provisions regarding "sensitive premises" – under the current LAP, people who want an alcohol licence have to consult with nearby sensitive premises such as schools and households before they can apply to the licensing committee. The proposed changes would expand the definition of sensitive premises to include Marae, increase the relevant radius within which sensitive premises have to be consulted, and clarify that these consultation rules only apply to new licence applications, not renewals.
- Add new discretionary conditions relating to external signage and consumption of alcohol on the footpath – discretionary conditions won't necessarily be applied to every licence, but by including them in the LAP, the District Licensing Committee has to consider applying them each time.

Review process

In order to inform the draft LAP, Council conducted a thorough review process. Specific input was received from Police, the District Licensing Inspectors, and the Medical Officer of Health. We also reached out to a range of stakeholders who we identified would likely have an interest in this policy. These stakeholders included representatives from the hospitality industry, retailers, tourism operators, organisations involved in reducing alcohol harm, healthcare and emergency services, rehabilitation service providers, and mana whenua. Stakeholders were asked for general feedback, and also for specific feedback on various options.

We gathered and collated data relating to local demographics and trends, the impacts of alcohol consumption including alcohol-related harm statistics from Te Whatu Ora and Police, and licensing information specific to Invercargill.

All of this information was considered by Council, and used to inform the preferred options which are now included in the draft LAP.

Key findings

Under s.78 of the Act, councils are required to have regard to the following matters:

- a. the objectives and policies of the district plan,
- b. the number of each kind of licensed premises, their location and opening hours,
- c. any alcohol ban areas,
- d. the demography of the local residents,
- e. the demography of tourists and visitors,
- f. the overall health indicators of local residents, and
- g. the nature and severity of the alcohol-related problems arising in the district.

Our key findings on these topics were as follows:

- a. the Invercargill City District Plan, amongst other aims, supports safe, healthy, and pleasant environments, allowing for growth and development, and using zoning to promote specific areas for certain types of businesses, such as the entertainment precinct and suburban shopping zones.
- b. As at August 2025 there were approximately 26 off-licences, 73 on-licences, and 45 club licences throughout the district. Licensing Inspectors reported that applications have remained consistent, and at the time around 8% of applications were considered "high risk". A minimal number of hearings have been needed over the last several years, suggesting that the current LAP is being adhered to well.

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- c. Invercargill has a full time and ongoing ban on alcohol in public places throughout much of central Invercargill, as defined in the Environmental Health Bylaw 2024. This is subject to any licences held by premises in those areas. A related matter is the Invercargill Licensing Trust (ILT), which has, legal trading rights in terms of hotels, taverns, and off-licences within its boundaries in Invercargill. The existence of the ILT has a significant impact on the number and location of off-licences and taverns in Invercargill, as it maintains a monopoly on such premises.
- d. Invercargill has a relatively higher percentage of the population living in areas of higher deprivation, compared to the rest of New Zealand. Similarly, a higher percentage of Māori in Invercargill live in more deprived areas compared to Māori in New Zealand as a whole. In both cases though, there is a smaller proportion of people living in decile 10 (most deprived) areas. This is relevant to the review because there is evidence to show that drinkers who live in more deprived areas tend to have higher rates of hazardous drinking and suffer more harms than drinkers in more advantaged communities.
- e. Most visitors to Invercargill are domestic rather than international, so the same demographic and risk considerations apply as for the country as a whole.
- f. Available data shows that Southlanders experience higher than the national average rates of high blood pressure, high cholesterol, and ischaemic heart disease. Southland also has high rates of alcohol consumption and hazardous drinking patterns, and the highest rate nationally of weekly binge-drinking.
- g. Te Whatu Ora data shows increases in alcohol-related presentations to Southland Hospital Emergency Department (ED) toward the weekend, with particular spikes between Saturday night and Sunday morning. The highest numbers are seen in the 15-24 age group, in males more often than females, and people from more deprived areas are disproportionately more likely to visit ED for alcohol-related harm. Alcohol-related presentations arrive at ED in an ambulance or with police more often than other presentations, and are more likely to be designated at the highest severity levels.

Police data shows clear increases in alcohol-related harm later at night, and especially in public places. Alcohol-related harm also correlates with more-deprived areas, and various "hot spots" of alcohol-related harm can be seen around the district.



Council was also required to consult with Police, the Medical Officer of Health, and District Licensing Inspectors when developing the draft policy. In addition to the points noted above, other key input from these parties includes the following:

- Police consider that the current LAP 2019 is fit for purpose, and are of the view there is no need to make any submissions to give consideration to any additions or changes to the policy. However, they also would not dispute or discourage any topics being submitted by the other reporting agencies, and therefore being given consideration by policy makers.
- Controlled Purchase Operations and checks of licensed premises carried out by Police in Invercargill since the current LAP 2019 has been in force have all been passed with no need for any enforcement actions.
- District Licensing Inspectors report the LAP 2019 has remained stable and effective, and note strong adherence to the policy alongside effective oversight. They note emerging trends with the growth of distilleries and craft breweries, leading to an increasing focus on their proximity to sensitive sites. Clubs have been in decline, and many are diversifying and partnering with other clubs in response. The issue of “preloading” continues to be a concern. It is also anticipated that tourist numbers and the population will continue to grow, which could lead to higher demands for alcohol-related businesses. The Inspectors have a focus on increasing community engagement, education, and collaboration with the sector, alongside robust risk management.
- The Medical Officer of Health emphasised the severity and extent of alcohol-related harm in New Zealand, which is significant and generally underestimated. Every year, alcohol causes approximately 900 deaths, 1,250 new cancer diagnoses (mostly breast and colon cancer), and 30,000 hospitalisations. It is estimated that alcohol harm costs the country \$9.1 billion annually. There is also data showing that

most alcohol consumed in New Zealand comes from off-licensed premises, so the Medical Officer of Health supports measures which limit the availability of alcohol from off-licences in particular.

- The Medical Officer of Health also made specific recommendations on a number of policy matters, including: introducing a minimum distance of 400m between licensed premises to reduce the risk of binge drinking, especially in areas of higher deprivation; widen the definition of “sensitive premises” to include marae and healthcare facilities (including rehabilitation treatment centres), extend the distance to 100m, and introduce a ban on new licensed premises in proximity to sensitive premises; introducing sinking lid or a freeze on new off-licences in areas of higher deprivation, noting the over-representation of residents from decile 7-10 areas in alcohol-related ED visits; reducing maximum off-licence trading hours to 9am-9pm; reducing maximum trading hours for on-licences in the CBD to a 1am closing time; reducing maximum club licence hours to 9am to 1am; introducing discretionary conditions relating to the restriction on the use of glass drink containers at special licence events, restricting external signage and advertising of alcohol, restricting the use of “buy now pay later” services, restrictions on sales of single serve drinks at off-licences (except for craft beers), restricting the maximum number of drinks per serve for special licence events, requirements around staffing; preventing special licences for events involving children or young people; and requiring applicants for special licences to consult with drug checking services.

Other stakeholder feedback was considered for each policy point and is summarised in the Local Alcohol Policy – Research Report, which is available on Let’s Talk.

Policy issues

There are a limited number of matters which can be addressed in a LAP. In this section, each recommended change is presented and explained, along with other available policy matters which were considered, and an explanation for why these have not been included in the draft LAP at this time.





1) Off-licence trading hours

Currently, the LAP 2019 allows maximum off-licence trading hours of 7am-11pm, which is the default maximum allowed by law.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: reduce maximum trading hours to 7am-10pm.	Reduces availability of alcohol, thereby reducing alcohol-related harm, especially chronic health issues. Is in line with the majority of other LAPs which have an earlier closing time than 11pm. Reflects widespread voluntary closing hours earlier than 11pm in Invercargill.	More restrictive for groups such as shift workers. Conversely, doesn't go as far as it could to reduce alcohol harm.
Alternative: no change, retain maximum hours of 7am-11pm.	Allows the greatest flexibility for consumers and businesses. Not unduly restrictive for groups such as shift workers.	Does not address the harms arising from alcohol availability from off-licences. Arguably out of step with the trends of other LAPs around the country.
Alternative: reduce maximum trading hours to 9am-9pm.	Would go much further to reduce alcohol availability and alcohol harm. A growing number of LAPs around the country have a 9pm latest closing time, so this would be in keeping with that national trend.	Much more restrictive on consumers and businesses.
Alternative: reduce maximum trading hours to 7am-9pm.	Would go further to reduce alcohol availability and alcohol harm but with less restriction on consumers and businesses.	More of the current off-licensed premises would be directly affected by having to close at 9pm.

Council prefers reducing the maximum trading hours to 7am-10pm because:

- Most alcohol consumed in New Zealand is purchased from off-licences, and evidence shows that reducing the availability of alcohol is a significant means of reducing alcohol-related harm.
- Southland has high rates of heavy drinkers and cardiovascular disease, and research shows that almost three quarters of drinking occasions among high-risk drinkers occur outside of on-licensed premises, in environments which therefore lack control or supervision.
- Reducing trading hours may help to reduce opportunities for "pre-loading", which was identified as an ongoing issue of concern by District Licensing Inspectors.
- New Zealand research has found that people who purchase alcohol from off-licences after 10pm are approximately twice as likely to be heavier drinkers.
- Most other LAPs around the country have an earlier closing time for off-licences than 11pm.
- The vast majority of off-licensed premises in Invercargill already choose to close before 10pm despite being able to open until 11pm, and a number close at 9pm or even earlier. The impact on most existing premises would not therefore be particularly significant.
- Reduced trading hours was well-supported by stakeholders during pre-consultation feedback.



2) Sensitive premises

Currently, the LAP 2019 requires that anyone applying for a new liquor licence (or to renew a licence but with a significant change in the style or operation of the business), has to show that they have consulted with “sensitive premises” within 50m of the licenced premises. “Sensitive premises” are schools and childcare facilities, religious premises, all residences, and community facilities.

The general purpose of such provisions is to help protect vulnerable groups from exposure to alcohol. Our current requirement to consult with sensitive premises ensures that organisations which could be particularly impacted by having a licenced premises nearby are involved early on in the decision-making process. It is important to note, no matter what consultation requirements we have in place, anyone can object to a licence application at any time.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: add marae to the list of sensitive premises, extend the relevant distance to 100m, and clarify that consultation will not be needed for new licences due only to a change in ownership of existing premises.	Clarifies that marae are sensitive premises. Widens the area for sensitive premises to be consulted, so more sensitive premises will be involved in licence applications. Clarifying the rules on renewals provides certainty for businesses. Not as onerous as a ban on new licences in proximity to sensitive premises.	Greater distance means more premises will need to be consulted, which could be more onerous for licence applicants. Conversely, arguably misses opportunities to reduce harm.
Alternative: no change.	Continues the status quo which is well understood and followed by stakeholders.	Arguably misses opportunities to reduce harm and improve clarity.
Alternative: : in addition to the provisions of option 1, add healthcare facilities to the list of sensitive premises.	Could help to protect more potentially vulnerable groups from exposure to alcohol, such as people experiencing alcohol addiction or receiving rehabilitation services. Definition of sensitive premises is already quite wide, so this change might increase the number of premises to be consulted, but it is likely that applicants would already have to do some consultation anyway.	Consultation requirement would be more onerous for licence applications, with more sensitive premises to consult, particularly in the CBD.
Alternative: : introduce a ban on new licences in proximity to sensitive premises	Would go much further to protect vulnerable groups from being exposed to alcohol. This approach is taken by many other LAPs nationwide.	Very restrictive on local business and potential future growth.

Council prefers to add marae to the list of sensitive premises, extend the relevant distance to 100m, and clarify that consultation will not be needed for new licences due only to a change in ownership of existing premises, because:

- Although marae are arguably already included in the existing LAP 2019 (since they are “community facilities”), it’s helpful to have this explicitly stated for the sake of clarity. Mana whenua are supportive of the change.
- The increased distance will help to widen the number of sensitive premises who are consulted, thereby increasing the opportunity to reduce harm, whilst the fact this is only a consultation requirement rather than an outright ban on new premises (which is the approach taken by many other LAPs around New Zealand), means it is not unduly restrictive on businesses.
- The clarified wording around renewals will provide certainty for applicants.
- Adding healthcare facilities to the definition of sensitive premises might create an unreasonable burden on licence applicants, particularly in the CBD.





3) Discretionary conditions

Discretionary conditions are conditions which the District Licensing Committee (DLC) can choose to include on a licence, or not, as they see fit. If a discretionary condition is listed in a LAP, the DLC must specifically consider whether or not to include it. They are not required to include it, and can always add any discretionary condition whether or not it is in the LAP.

The current LAP 2019 has a list of discretionary conditions covering premises layout and design, staffing, host responsibility, amenity and good order, management of incidents, and utilising CPTED (Crime Prevention Through Environmental Design) principles.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: add a restriction on any new external alcohol-related signage to be no more than 50% of the external area of the premises	Helps to reduce the visibility of alcohol and alcohol related advertising, which is known to be particularly harmful for children. Burden to business owners reduced by only applying to new signage.	Represents a restriction on the ability of licensees to carry on their businesses.
Preferred: add a condition that the consumption of alcohol on designated areas of the footpath end by 11pm	This is already used in 3 of the 4 current on-licences with outdoor areas on the footpath. Aligns with alcohol ban area. May help reduce alcohol-related harm arising after 11pm.	Could undermine inner city vibrancy and al fresco dining.
Alternative: add a restriction on the use of glass containers at special licence events	Has been used in special licences already. Inherently reduces risk of harm from broken glass.	May negatively and unduly impact "high-end" or low risk events.
Alternative: add a restriction on the use of "buy now, pay later" services	Lower up front costs may make alcohol seem more affordable and encourage purchase. Such services heavily used by younger people who are also at increased risk of being heavy drinkers.	Would unreasonably impact people buying alcohol for large events such as weddings. Lack of local data to suggest this is currently an issue.
Alternative: add a restriction on the sale of single serve drinks at off-licences	Single serve drinks might encourage purchase and consumption as cheaper than larger packs.	No local data found to suggest this is a particular concern.
Alternative: add a restriction on the maximum number of drinks per serve for special licences	Increases opportunities for bar staff to assess intoxication and identify patrons who may need assistance.	Licensing Inspectors report special licence events are already well managed, with limits imposed voluntarily as needed. Not thought necessary to include in LAP.
Alternative: amend the existing discretionary condition on staffing for club licences to require a certified manager to be on duty when alcohol is being sold or supplied after 8pm or when patron numbers exceed 50 people	Further details around periods of high risk could be helpful for the District Licensing Committee.	LAP 2019 already has discretionary conditions around staffing, including certified managers, during higher risk periods, and DLC exercises discretion. Not thought necessary to specify more detail in LAP.



Council prefers to add restrictions on external signage and alcohol on the footpath because:

- The restriction on external signage to be no more than 50% of the external area of the premises would expand and develop the existing discretionary conditions, and go towards reducing harm for children and young people in particular which arises from them being exposed to alcohol advertising. The restriction would only apply to new signage, so is not thought to be unduly onerous for licence holders.
- Although there is a desire to support inner-city vibrancy through al fresco dining, this is to be

balanced against the incidence of alcohol-related harm identified in Police data, which increases markedly between 11pm and 4am.

Limitations on consuming alcohol on the footpath would also be in line with the alcohol ban in the Environmental Health Bylaw. This discretionary condition is also already used in three of the four on-licences for premises with outside areas on or near the footpath.

4) Location of premises in relation to broad areas

The existing LAP 2019 has no provisions regarding the location of premises in relation to broad areas.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: no change	No particular need identified for such a policy. Not well supported by evidence. Not strongly supported in early engagement feedback.	Potentially misses an opportunity to reduce harm.

Council did not identify any compelling reasons to introduce a provision which would restrict licences to certain broad areas or zones. The effectiveness of these types of policies is not well supported by evidence, and such a policy was not particularly supported by stakeholders during early engagement feedback.

5) Location of premises in proximity to other premises

The existing LAP 2019 has no provisions regarding the location of premises relation to their proximity to other premises.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: no change	No particular need identified in Invercargill.	Potentially misses an opportunity to reduce harm. Does not future proof should local context change.

Council has not supported introducing a minimum distance between premises because it has not identified a particular need for this in Invercargill.

These types of policies can prevent the clustering of premises or reduce the density of premises, and thereby reduce overall alcohol harm. However, and due in part to the existence of the ILT, clustering and high density of premises are not significant issues for Invercargill.





6) Issuing further licences

The existing LAP 2019 has no restrictions on the issuing of further licences of a particular kind in the district or any part of the district.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: no change	Lack of compelling evidence for needing to reduce density of licensed premises in Invercargill specifically.	Potentially misses an opportunity to reduce harm. Does not future proof should local context change.
Alternative: introduce a freeze on new off-licences being issued in areas of high deprivation	Would reduce density of licensed premises in more deprived areas, potentially reducing harm and improving equity. More deprived areas known to have higher rates of alcohol-related harm.	Could have disproportionate impact on businesses when there is limited evidence of particular issues with density of licensed premises in Invercargill.

Council has not supported introducing restrictions on issuing further licences, such as a cap on licences, a sinking lid, or a freeze on new licences being issued.

It is recognised that these types of policies can prevent over-saturation of licensed premises, or reduce the density of premises in particular areas. In New Zealand as a whole, off-licences tend to be disproportionately dense in more deprived areas. However, although there is a higher incidence of alcohol harm in more deprived areas of Invercargill, these areas do not have a disproportionately high density of off-licences in Invercargill as a whole. And although there is a higher density of off-licences in Bluff compared to the population, there is no evidence of particular issues arising in Bluff which would justify singling it out as an area for restrictions.

7) On-licence trading hours

Currently the LAP 2019 allows on-licences to trade from 8am until 1am or 3am, depending on the location and type of venue.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: no change	No significant issues identified in Invercargill which would necessitate a change.	Potentially misses an opportunity to reduce harm.
Alternative: reduce maximum trading hours to 9am-1am for all on-licences	Reduces alcohol availability and therefore the risk of alcohol-related harm. Might reduce incidence of alcohol-related harm later at night / overnight. Evidence of increased alcohol harm late at night occurring in Invercargill.	Restricts business operations. Might negatively impact inner city vibrancy.

Council has not supported reducing the maximum trading hours for on-licensed premises.

Although it is acknowledged that there is evidence of increased alcohol-related harm later at night in Invercargill, it is not thought to be significant enough at this time to require shorter maximum trading hours.



8) Club licence trading hours

The existing LAP 2019 allows maximum trading hours of 8am-3am for club licences, and applicants need to justify the requested hours in terms of the club's activities.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: no change	No significant issues identified in Invercargill which would necessitate a change. Most club licences start later than 8am, and some clubs have already voluntarily reduced hours or don't use full available licensed hours.	Potentially misses an opportunity to reduce harm.
Alternative: reduce maximum trading hours for club licences to 9am-1am	Reduces alcohol availability and therefore the risk of alcohol-related harm.	Could unduly impact some clubs depending on their activities, without particular concerns being identified to justify this.

Council has not supported any changes to the maximum trading hours for club licences.

No particular concerns have been identified for Invercargill. Instead, District Licensing Inspectors have reported that some clubs have voluntarily reduced their licensed hours, and others don't use the full extent of the hours they are licensed for.

9) Special licence trading hours

The existing LAP 2019 has no restrictions relating to special licence trading hours, but applicants need to justify the hours requested in terms of the purpose of the function or event.

POLICY	ADVANTAGES	DISADVANTAGES
Preferred: no change	No significant issues identified in Invercargill which would necessitate a change. Limited special licence events with extended duration in Invercargill. Special licence events tend to be well managed already.	Potentially misses an opportunity to reduce harm.
Alternative: restrict maximum hours for special licences to no later than 1am and no more than six hours duration	Could reduce alcohol availability and therefore risk of alcohol-related harm.	Could unduly impact some events without particular concerns being identified to justify this.

Council has not supported any changes to the provisions on special licence trading hours, as no particular issues have been identified which would support this.

Invercargill does not have many large events with special licences – only two events in the last year were licensed for more than six hours. District Licensing Inspectors report that special licence events tend to be very well managed, with duty managers proactively taking voluntary steps such as reducing the maximum number of drinks per serve.





10) Other matters

There are other provisions which could be included in the LAP, but Council has not recommended any at this time.

POLICY	ADVANTAGES	DISADVANTAGES
Option: introduce a one-way door restriction	Potentially reduces the incidence of public disorderly conduct by preventing large numbers of intoxicated people leaving premises at the same time.	Evidence for the effectiveness of one-way door policies is mixed. No particular need identified for this sort of policy in Invercargill.
Option: introduce a ban on special licenses for events on school grounds or focussed on children/young people	Reduces the exposure of alcohol to children.	Such events are very rare in Invercargill so need has been identified for this sort of provision.
Option: require high risk events applying for a special licence to consult with drug checking services	May reduce drug-related harm at special licence events.	No evidence has been identified to suggest this is a particular issue for Invercargill. There are comparatively few high risk events in the district.
Option: require new on-licence applications to be accompanied by a Social Impact Assessment report	Could help to reduce the potentially harmful impacts which might arise from on-licensed venues.	No particular need for this identified. Such reports would be an additional burden for licence applicants.

How do I provide feedback to the Local Alcohol Policy?



The easiest way is to give feedback online using the survey form at letstalk.icc.govt.nz

Alternatively, you can pick up a feedback form and drop one off at **Te Hīnaki Civic Building at 101 Esk St**, the **Invercargill Public Library** or the **Bluff Service Centre**. You can also email your feedback to the Policy team at policy@icc.govt.nz

Post: Local Alcohol Policy
Private Bag 90104,
Invercargill 9840



Submissions are due by 5pm, 18 February 2026.