



National Public Health Services
Toi Te Ora Public Health
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16 September 2022

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Tēnā Koutou

Thank you for the invitation to provide feedback on the Tauranga City Council (TCC) Local Alcohol Policy (LAP). This letter provides the summary feedback from the Medical Officers of Health for the Bay of Plenty and Lakes regions.

Toi Te Ora Public Health's purpose is to improve and protect the health of the population with a focus on the achievement of equity, in particular for Māori. It is our role to help reduce the impact of alcohol and the burden of harm on the community, as well as the health of individuals.

A large body of research supports addressing alcohol-related harm and improving health outcomes through population-based prevention strategies that focus on changing physical and social environments (World Health Organisation, 2022). Alcohol control is therefore a key enforcement area for Toi Te Ora.

Alcohol has a significant adverse impact on well-being and safety and is a leading cause of disease and disability. It is also a well-known fact that Māori experience a disproportionate amount of alcohol-related harm compared to non-Māori and that this has been persistent (Muriwai, Huckle, & Romeo, 2018). It is pivotal for those in a position of authority to lead with a sense of social responsibility for whom services are provided.

Upholding Te Tiriti o Waitangi in Alcohol Law

It is important that alcohol policies within Aotearoa districts are reflective of and uphold the integrity of Te Tiriti o Waitangi. Māori experience a disproportionate level of alcohol-related harm, yet there are many barriers to Māori having a meaningful say in alcohol decisions that affect their communities (Te Hirianga Hauora Health Promotion Agency, 2022b). Therefore, policy action and decisions need to include input and guidance from local iwi to align policies that help support our Māori communities. Council can also align their LAP with Te Hirianga Hauora Te Tiriti o Waitangi-aligned National Alcohol Harm Minimisation Framework (Te Hirianga Hauora Public Health Agency, 2022a), which is a framework aspiring to create an Aotearoa free from alcohol-related harm. The framework is based on [The World Health Organisations SAFER interventions](#) to help reduce alcohol-related harm. The two pillars of action included alcohol policy and cultural change. This is important, as it outlines the need for cultural guidance to create robust and suitable policies specifically around alcohol. From a Te Hirianga Hauora

report, 48% of Māori have shown to experienced harm from others drinking, this even more so for females, those in most deprived areas and our Rangatahi (aged 18-24 years). This means that it is important that policy and legislation reduce barriers for Māori to participate in decision making on alcohol sales and marketing setting. This can be done by Council working with and empowering *“whānau/hapū/iwi/rōpū so that they can meaningfully and effectively participate in the decisions about, and determine what happens with, alcohol in their communities”* (Te Hirianga Hauora Health Promotion Agency, 2022b)

Toi Te Ora Public Health recommends the following changes to the Tauranga City Council LAP to improve the local environment and culture around the consumption of alcohol to be considered and adopted:

- Uphold the current one-way door policy in the last hour of opening for all premises that are open after 1:00 am
- Change the final alcohol sales time to 2.00AM for all on-licensed premises (such as bars and nightclubs) in the central city
- Permit off-licensed premises to sell alcohol after 10AM
- No new on-licensed premises to be established in areas zoned industrial
- No new bottle stores to be established in areas with a deprivation index of seven or more
- Include a range of discretionary conditions for off-licensed premises.

Public Support for Restriction of Alcohol Availability and Marketing

Toi Te Ora Public Health recently published a report ([Toi Te Ora Public Health, 2020](#)) reflecting the community's views across a range of public health topics relevant to the Bay of Plenty District. The alcohol-related findings showed the following:

- 63.2% of respondents support reducing the number of places that sell alcohol
- 59.5% of respondents support more restrictions on advertising and sponsorship by alcohol companies
- 71.6% of respondents believe supermarkets and liquor stores should not be selling alcohol before 10AM
- 62.7% of respondents believe more restrictions on alcohol availability would improve safety in towns and cities at night (Toi Te Ora Public Health, 2020).

These results clearly indicate the community is supportive of tighter regulatory measures to manage issues such as alcohol outlet density, sponsorship, trading hours, and availability. A strengthened LAP will help the Council achieve the policy goal to ‘reflect local communities’ character, amenity, values, preferences, and needs (Western Bay of Plenty District Council, Tauranga City Council, 2012).

Alcohol-Related Harm – Morbidity in Tauranga

Toi Te Ora Public Health Intelligence Brief (2021) (Appendix One) outlines the alcohol-related harm within the Tauranga District. Of concern, over the last 10 years, the rate of admission to hospitals with conditions wholly attributable to alcohol has consistently been higher in Tauranga than the average rate for New Zealand.

Furthermore, alcohol-related hospital admissions rates were calculated for 1551 suburbs across the country. Several suburbs within the Tauranga District rank within the highest 100 for the number of alcohol-related admissions according to the broad definition. The suburbs with the highest rates of alcohol admissions include Tauranga Central, Mt Maunganui North, Tauranga South, and Gate Pa. These comparatively high rates of alcohol-related hospital admissions provide good cause to strengthen the TCC LAP in conjunction with other measures to reduce alcohol-related harm.

Moreover, Tauranga has higher hospital admission rates than the national average due to chronic alcohol use. This relatively higher level of health impact is important because those within rural parts of the district that experience harm caused by acute alcohol will have to travel much further to access hospital services.

One-way Door Policy

The one-way door policy or otherwise known as “lockouts” are put in place to prevent alcohol-related violence. The research confirms the assertion that one-way door policies are effective in achieving positive outcomes for the community, and “*have potential as a major crime prevention technique*” (Palk et al., 2010). One-way door policies allow management of patrons by staggering the exiting from on-licence premises, reducing clusters of intoxicated people. This reduces the risk of people within our community becoming a victim of a crime or engaging in criminal or disorderly behaviour. Furthermore, it reduces the stress on taxis and other means of public transport (Mazerolle et al., 2011; Nepal et al., 2018).

Research on one-way door policy identified a significant reduction in violence inside on-licence premises, but no significant change to the rate of violence on the streets of entertainment districts (Mazerolle et al., 2011). One-way door policies are not the only civil laws required to mitigate the risks and dangers of alcohol-related harm within the entertainment district. One-way policies should be applied within a multi-factorial approach such as restricting trading hours to have the greatest effect in reducing overall alcohol-related incidents (Palk et al., 2010).

Restricting Trading Hours

It is recommended that the trading hours of on-licence premises be reduced to 2am within the TCC jurisdiction. Research shows that alcohol-related harm decreases when trading hours are restricted (Nepal et al., 2018). In addition, research shows that restricting on-licence trading hours has the most significant impact on alcohol harm reduction amongst 15 – 29-year-olds (Connor et al., 2020). The LAP and associated trading hour restrictions could play a pivotal role in minimising alcohol-related harm in Tauranga.

In conclusion, there is clear evidence that the population of the Tauranga district suffers a relatively higher burden of alcohol-related harm compared to the rest of the country. Most local community members have expressed the desire to see reduced alcohol availability which would reduce the negative impact on our community, and in particular the local Māori population. The changes Toi Te Ora health recommends to the proposed Tauranga LAP are consistent with what the local community both wants and needs to happen to secure and ensure a healthier future for all.

Toi Te Ora Public Health appreciates the opportunity to provide feedback on the TCC LAP, which is a critical policy to protect the health of the community against alcohol-related harm. We would appreciate the opportunity to present on this matter.

Sincerely



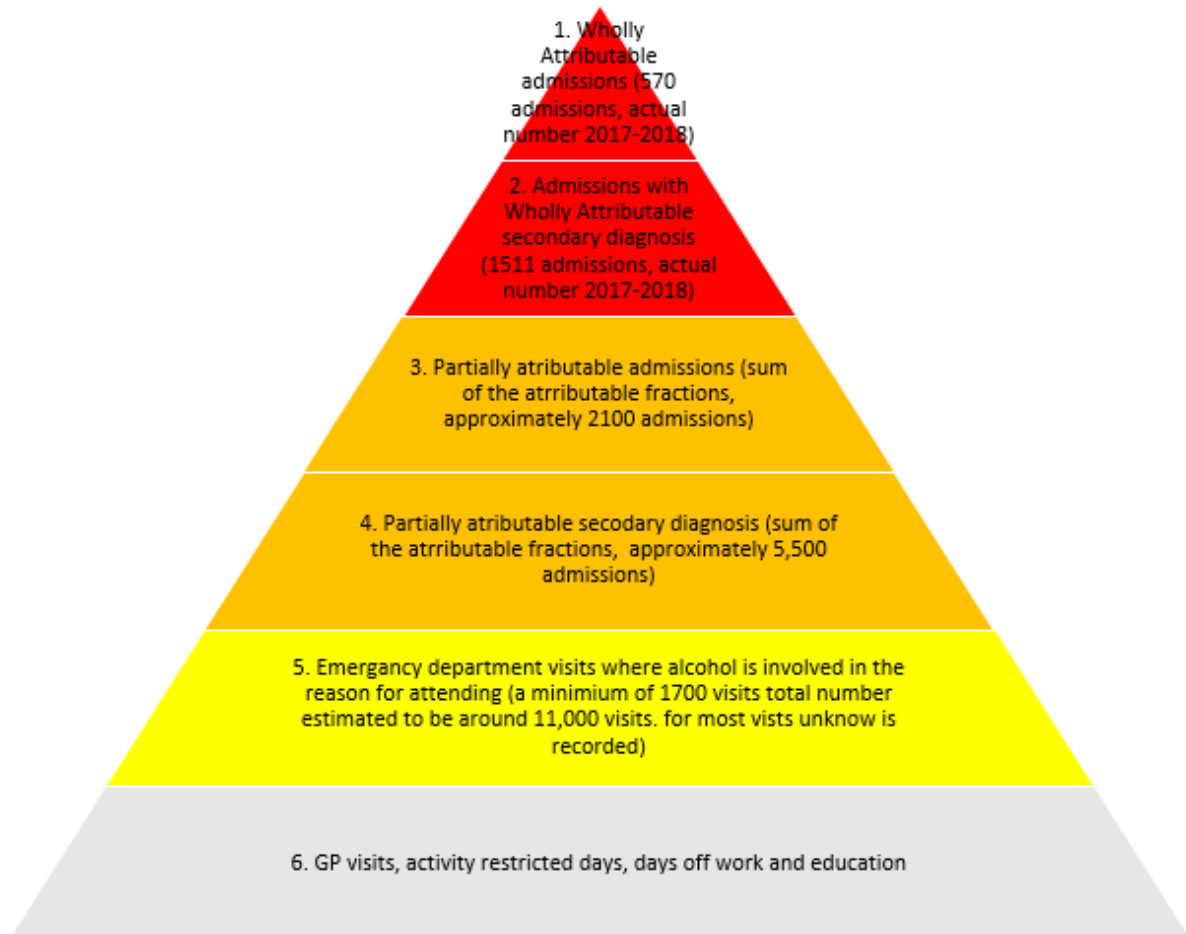
Dr Lynne Lane
Medical Officer of Health

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Alcohol related harm – Morbidity – Not for further distribution

Figure: Types of Alcohol related morbidity and estimates for the Bay of Plenty DHB



Currently we have only reliable data for the top two sections of the pyramid. Section 3 and 4 require detailed work to be carried out on the amount of alcohol New Zealanders are currently drinking in order to calculate the alcohol attributable fraction. Data is being collected about emergency department visits for section 5, however data quality improvements need to occur.

Wholly attributable admissions to hospital

Wholly attributable: diagnosis of a condition considered wholly attributable to alcohol as per Jones and Bellis (2014). ICD 10 AM codes: E24.4, F10, G31.2, G62.1, G72.1, I42.6, K29.2, K70, K85.2, K86.0, T51.0, T51.1, T51.9, Q86.0, R78.0, X45, X65, Y15, Y90, Y91.

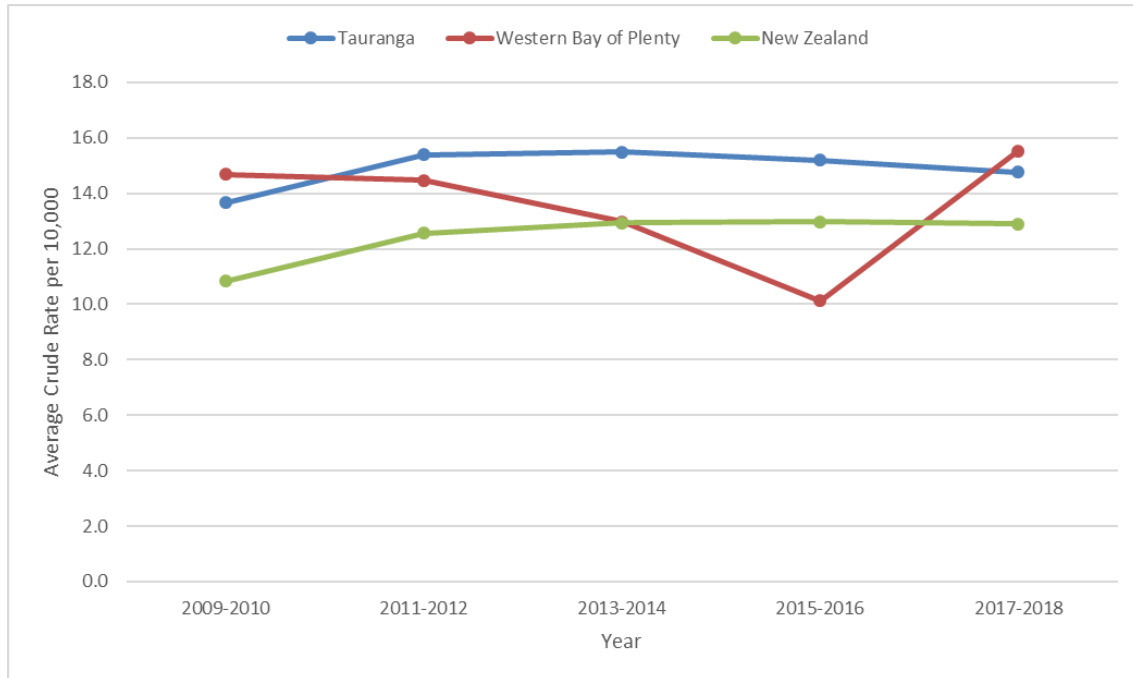
Two method of measuring wholly attributable admissions:

- Narrow measure – where the main reason for admission to hospital was wholly attributable to alcohol. The narrow measure represents the top of the pyramid.
- Broad measure – where the primary reason for hospital admission or a secondary diagnosis was wholly attributable to alcohol. The broad measure represents the top two sections of the pyramid combined.

Rates of admissions – calculated using the statistic New Zealand Population estimates for territorial authorities.

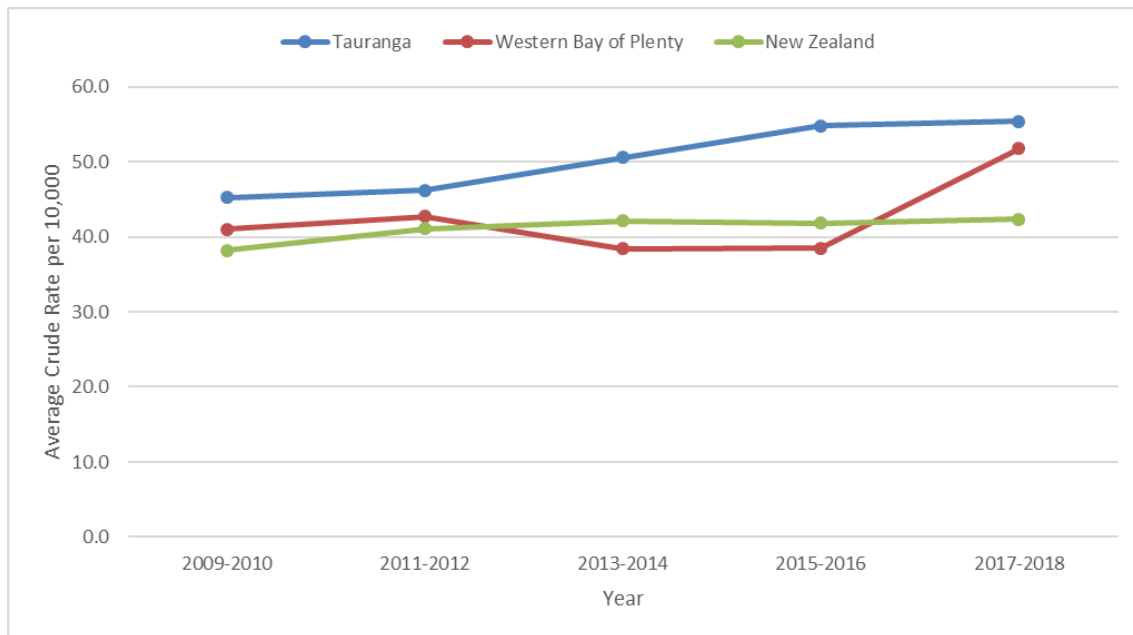
Wholly attributable admissions to hospital Narrow Measure

Figure: Crude rates of admissions to hospital for the narrow measure of admissions to hospital wholly attributable to Alcohol



Wholly attributable admissions to hospital Broad Measure

Figure: Crude rates of admissions to hospital for the broad measure of admissions to hospital wholly attributable to Alcohol



References:

Jones L, Bellis MA. 2014. Updating England-Specific Alcohol Attributable Fractions. Liverpool: Centre for Public Health, Liverpool John Moores University.

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Appendix – TLA Narrow Definition Data Table

TLA	2009-2010		2011-2012		2013-2014		2015-2016		2017-2018		2009-2018	
	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)
Tauranga	248	13.7	287	15.4	299	15.5	314	15.2	330	14.8	1478	14.9
Western BOP	105	14.7	105	14.5	96	13.0	80	10.1	133	15.5	519	13.6
New Zealand	7418	10.8	8759	12.6	9230	12.9	9715	13.0	10096	12.9	45218	12.5

Appendix – TLA Broad Definition Data Table

TLA	2009-2010		2011-2012		2013-2014		2015-2016		2017-2018		2009-2018	
	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)	number of discharges	crude average rate (per 10,000)
Tauranga	821	45.3	861	46.2	976	50.5	1132	54.8	1237	55.4	5027	50.7
Western BOP	293	41.0	310	42.7	284	38.4	304	38.5	443	51.8	1634	42.7
New Zealand	26116	38.2	28634	41.1	30062	42.1	31267	41.8	33147	42.3	149226	41.1

Appendix – Census Area Units Narrow Definition Data Table

TIA_name	DOM_description	2013-2014	2013-2014 Rank	2015-2016	2015-2016 Rank	2017-2018 Rank	2017-2018 Rank	2013-2018	2013-2018 Rank
Tauranga	Tauranga Central	59	5	39	11	34	13	132	8
Western BOP	Te Puke East	17	92	9	294	30	20	56	52
Tauranga	Greerton	18	73	25	39	9	334	52	68
Tauranga	Mt Maunganui North	12	199	20	63	19	61	51	71
Tauranga	Tauranga South	15	130	21	58	10	284	46	91
Tauranga	Gate Pa	5	665	9	335	27	28	41	122
Western BOP	Minden	6	571	9	331	25	32	40	130
Tauranga	Hairini	9	336	19	69	12	192	40	137
Tauranga	Te Maunga	10	273	19	68	11	235	40	138
Tauranga	Tauranga Hospital	13	166	8	365	18	90	39	143
Tauranga	Palm Springs	5	667	10	281	19	72	34	208
Western BOP	Kaimai	10	284	13	173	11	245	34	213
Tauranga	Doncaster	9	335	15	132	8	409	32	237
Tauranga	Omanu	10	272	5	619	16	118	31	242
Tauranga	Matua	5	666	13	183	13	170	31	243
Tauranga	Brookfield	14	146	10	263	5	677	29	287
Tauranga	Arataki	12	198	6	515	10	318	28	301
Tauranga	Welcome Bay East	6	553	9	328	12	207	27	320
Tauranga	Pyes Pa	8	399	3	888	15	131	26	334
Tauranga	Judea	11	229	7	434	7	501	25	382
Tauranga	Yatton Park	8	400	5	631	11	273	24	391
Tauranga	Otumoetai North	4	816	12	212	8	412	24	398
Western BOP	Katikati Community	9	346	8	377	5	688	22	458
Tauranga	Papamoa Beach East	4	817	8	405	9	371	21	472
Tauranga	Bellevue	10	270	4	729	7	533	21	482
Western BOP	Te Puna	12	203	7	432	2	1076	21	492
Western BOP	Pongakawa	5	692	6	555	9	383	20	500
Tauranga	Bethlehem	10	271	3	875	7	543	20	507
Tauranga	Bethlehem East	4	814	5	676	8	443	17	601
Tauranga	Welcome Bay West	3	955	7	493	7	509	17	607
Western BOP	Waihi Beach	5	693	5	660	7	524	17	613
Tauranga	Palm Beach	6	552	6	542	5	707	17	630
Western BOP	Rangioru	6	572	1	1220	8	467	15	681
Tauranga	Maungatapu	4	815	6	567	5	709	15	692
Tauranga	Otumoetai South	7	472	6	534	2	1079	15	707
Western BOP	Te Puke West	3	985	4	813	7	538	14	719
Western BOP	Aongatete	5	690	5	659	4	829	14	741
Western BOP	Omokoroa	5	691	2	1072	6	650	13	773
Tauranga	Pacific View	8	398	3	887	2	1114	13	806
Tauranga	Te Reti	3	954	4	807	5	732	12	833
Western BOP	Upper Papamoa	4	840	7	487			11	908
Western BOP	Athenree	4	839	1	1245	5	763	10	919

TLA_name	DOM_description	2013-2014	2013-2014 Rank	2015-2016	2015-2016 Rank	2017-2018 Rank	2017-2018 Rank	2013-2018	2013-2018 Rank
Western BOP	Maketu Community	2	1163	2	1139	5	760	9	963
Tauranga	Poike	3	953	3	959	3	979	9	991
Tauranga	Gravatt	3	952	1	1263	2	1165	6	1175
Western BOP	Tahawai	1	1406		1622	4	915	5	1208
Western BOP	Ohauiti - Ngapeke		1714	1	1467	3	1045	4	1285
Tauranga	Kaitemako	1	1355	2	1165	1	1339	4	1325
Western BOP	Paengaroa	2	1164		1545	1	1432	3	1429
Tauranga	Kairua		1643		1701	2	1239	2	1480
Tauranga	Matapihi		1644	1	1442	1	1405	2	1512
Western BOP	Island View - Pios Beach		1713		1723	1	1511	1	1651

Appendix – Census Area Units Broad Definition Data Table

TLA_Name	Domicile name	2013-2014	2013-2014 Rank	2015-2016	2015-2016 Rank	2017-2018	2017-2018 Rank	2013-2018	2013-2018 Rank
Tauranga	Tauranga Central	143	5	133	7	108	10	384	7
Tauranga	Mt Maunganui North	70	33	63	51	66	42	199	35
Tauranga	Tauranga South	70	34	72	33	56	62	198	36
Western BOP	Te Puke East	47	109	45	122	74	28	166	62
Tauranga	Greerton	44	133	75	30	45	132	164	63
Tauranga	Gate Pa	35	227	34	255	94	16	163	64
Tauranga	Hairini	34	234	51	86	47	111	132	118
Tauranga	Doncaster	30	299	51	87	46	119	127	133
Western BOP	Kaimai	29	316	57	65	36	245	122	159
Tauranga	Yatton Park	37	194	34	254	45	138	116	176
Tauranga	Brookfield	41	158	45	125	30	347	116	181
Tauranga	Omanu	30	301	30	321	54	77	114	185
Tauranga	Arataki	37	193	36	224	40	203	113	191
Tauranga	Te Maunga	29	315	35	244	42	173	106	223
Western BOP	Katikati Community	35	228	29	332	41	191	105	229
Tauranga	Tauranga Hospital	38	183	28	349	36	249	102	247
Tauranga	Judea	30	300	36	228	35	264	101	250
Tauranga	Otumoetai North	22	484	37	217	41	186	100	256
Western BOP	Minden	20	543	20	570	49	105	89	329
Tauranga	Welcome Bay East	18	583	28	370	42	176	88	335
Tauranga	Otumoetai South	16	661	38	199	34	276	88	340
Tauranga	Bellevue	36	208	21	525	30	358	87	348
Tauranga	Palm Springs	12	835	24	456	50	100	86	353
Tauranga	Pyes Pa	20	542	24	453	41	194	85	357
Tauranga	Matua	16	660	33	279	35	267	84	363
Tauranga	Welcome Bay West	19	567	33	276	30	351	82	381
Tauranga	Bethlehem	29	314	31	304	22	543	82	385
Tauranga	Palm Beach	21	509	27	382	29	374	77	412
Tauranga	Papamoa Beach East	17	611	29	341	23	516	69	495
Western BOP	Te Puke West	19	568	22	509	23	524	64	547
Western BOP	Rangiuru	16	662	12	862	35	273	63	555
Western BOP	Omokoroa	13	785	9	1002	39	220	61	568
Western BOP	Waihi Beach	14	732	15	748	27	443	56	627
Western BOP	Aongatete	12	836	15	753	26	465	53	667
Tauranga	Maungatapu	15	696	17	671	19	672	51	697
Western BOP	Pongakawa	11	878	18	641	19	669	48	732
Tauranga	Te Reti	10	934	20	587	17	737	47	747
Western BOP	Te Puna	17	612	16	703	11	959	44	795
Tauranga	Pacific View	20	541	7	1101	16	799	43	811
Tauranga	Gravatt	9	986	7	1120	16	800	32	962
Western BOP	Upper Papamoa	11	879	17	678	4	1382	32	975
Tauranga	Bethlehem East	7	1100	8	1073	16	797	31	980

TLA_Name	Domicile name	2013-2014	2013-2014 Rank	2015-2016	2015-2016 Rank	2017-2018	2017-2018 Rank	2013-2018	2013-2018 Rank
Western BOP	Maketu Community	8	1045	9	1015	14	860	31	983
Western BOP	Tahawai	10	935	4	1317	14	867	28	1032
Tauranga	Poike	7	1101	12	885	9	1049	28	1038
Western BOP	Athenree	11	877	5	1245	7	1201	23	1132
Tauranga	Kaitemako	5	1207	5	1272	8	1151	18	1226
Tauranga	Matapihi	6	1155	5	1264	7	1202	18	1229
Western BOP	Ohauti - Ngapeke	2	1446	4	1372	9	1084	15	1296
Western BOP	Paengaroa	5	1208	4	1341	5	1350	14	1341
Tauranga	Kairua	3	1347	3	1433	6	1284	12	1390
Western BOP	Island View - Pios Beach	1	1543	1	1660	9	1095	11	1414
Western BOP	Matakana Island	2	1445	2	1546	1	1689	5	1668
Tauranga	Tauranga City-Marinas					2	1651	2	1777
Western BOP	Inlet - Tauranga Harbour Omokoroa	1	1542					1	1840