HAVE YOUR SAY ON
HOW WE MANAGE ALCOHOL USE IN WELLINGTON CITY

The Council is proposing to adopt a Local Alcohol Policy to give communities greater control over when, where and how alcohol is sold.

We have also developed a draft Alcohol Management Strategy to deal with the wider issues relating to alcohol use.

Before making any final decisions, we want to know what you think.

We need your feedback by 5pm on 2 August 2013.
THE RIGHT MIX
Wellington City Council has both an interest and responsibility for alcohol management in Wellington City and we are seeking your views on a draft Alcohol Management Strategy and a draft Local Alcohol Policy for the city.

The Sale and Supply of Alcohol Act 2012 allows councils to develop local alcohol policies (LAPs) that cover the sale and availability of alcohol – including the number of outlets, their location and conditions under which they can operate.

Once a LAP is in place, the local District Licensing Committee and the national Alcohol Regulatory and Licensing Authority must take notice of it when making decisions on liquor licence applications.

Councils that do not prepare a LAP will be subject to national maximum trading hours. These trading hours would be 8am–4am for on-licences (bars, clubs, and restaurants) and 7am–11pm for off-licences (liquor stores and supermarkets). However, not being able to set trading hours specific to areas in the city creates a risk for achieving our strategic goals.

In November 2012, the Council decided to prepare an Alcohol Management Strategy as a first step towards a draft LAP. The strategy takes a wider view of alcohol-related behaviour, how to achieve our aspirations for a dynamic central city with vibrant suburban centres, and how we can all play a part in reducing alcohol-related harm.

The Council has been working with members of the public, the hospitality and retail industry, Police, Medical Officer of Health and residents associations to develop a draft strategy and draft LAP so we can respond specifically to what Wellington needs. Now we want to hear from a wider cross-section of people.

The draft strategy and draft LAP was prepared with community input from a comprehensive consultation programme called The Right Mix?

The issue most frequently raised was concern about excessive pre-loading and side-loading (drinking your own alcohol before and between visiting bars). People said we also needed to look at a greater mix of late-night activities, the central city liquor ban, the extent of host responsibility, and the proximity and density of licensed premises.

This is a summary of what’s proposed. Full copies of the draft policy and strategy are available from:

- Wellington.govt.nz
- Council libraries
- Council Service Centre, 101 Wakefield Street
- Or phone 499 4444.
The goals of the draft Alcohol Management Strategy for the central city are:

- Supporting a city rhythm – transitioning the city through key phases:
  - Daytime – commerce
  - Evening – entertainment
  - Late night – bars and clubs, more evening entertainment
  - Sleep, city regeneration – cleaning and rest.
- Promoting a dynamic night-time economy with well-managed and well-designed pockets of activity that offer a well-balanced mix of social and alcohol-related trading
- Creating a safe and welcoming city where risks are managed effectively and communities are connected
- Building an accessible city where people can safely and easily move in and around the central city.

For the suburbs:

- Creating spaces around town centres and suburban hubs for business and social activities and community networking to support the health and wellbeing of communities
- Supporting local amenity – ensuring there are pleasant and agreeable places to live alongside vibrant suburban centres through greater restrictions on the sale of alcohol than in the central city.

The strategy has five focus areas: pre-loading/side-loading, central city safety and vibrancy, community participation, alcohol at events, and sector collaboration.

We want to achieve:

- **Reduced harm**: a reduction in harm created by the excessive consumption of alcohol, drinking in public places, and from vandalism
- **Increased vibrancy**: an increase in a mix of late-night activity in the central city with less emphasis on alcohol consumption
- **Improved amenity**: better enjoyment of suburban, inner-city, and open spaces
- **Greater personal responsibility**: more people consuming alcohol safely and responsibly
- **Greater collaboration**: a cooperative approach to resolving alcohol-related issues involving licensees, local and central government, and community organisations.

These goals strike a balance between promoting a dynamic central city with vibrant suburban centres and achieving a noticeable reduction in alcohol-related harm. They also form the basis for developing the draft LAP, which will give communities greater control over when, where, and how alcohol is sold in Wellington City.
DRAFT LOCAL ALCOHOL POLICY

This summary provides a brief description of the draft LAP and the process the Council will follow if it decides to produce a provisional LAP.

A Local Alcohol Policy creates licensing policies within Wellington City that meet the strategic objectives and the specific needs of local communities. A LAP is also an important tool to assist the District Licensing Committee in issuing liquor licences.

A LAP is restricted to dealing with matters related to the administration and licensing of alcohol.

**Recommended approach:**
Prepare a draft LAP based on managing identified risks in specific zones.

**Off-licence maximum trading hours**

Off-licence purchasing patterns on Friday and Saturday nights show a spike in alcohol-only supermarket purchases from 9pm – purchasing behaviour that is conducive to excessive pre-loading and side-loading.

Preloading and side-loading is more common in younger age groups, 18–29 years of age, who are looking for lower-priced alcohol and are more likely to be late-night customers (trading past 2am). International experience supports restricting trading hours for off-licences so that these premises are closed before at-risk groups move into the city.

In considering whether to restrict off-licence trading hours, we considered whether it was reasonable to ask people to sacrifice a degree of personal convenience to support an initiative to curb excessive pre-loading and side-loading.

**Recommended approach:**
Set maximum trading hours for off-licences at 7am–9pm.

**On-licence maximum trading hours**

Crime and harm statistics show that late-night trading in the central city is higher-risk. We support an approach to maximum trading hours that:
- provides incentives to late-night licensees to invest in best practice to secure later trading hours
- reduces harm and/or the potential for harm – staggering closing times reduces conflict at congestion points and the demand on transport and policing services
- focuses the resources of the city into specific zones that can be better designed and intensively managed
- clearly defines which areas of the city you can expect to experience late-trading activity
- protects the enjoyment of local areas where this is an overriding priority, ie suburban centres.

Confining activity at high-risk times to specific locations in the central city enables clear communication of expectations around behaviour, a targeting of resources and closer monitoring and enforcement. When set alongside the application of specific conditions and by encouraging licensees to reduce their risk, this approach will improve alcohol and patron management and contribute to the safety of individuals and the community.
Recommended approach:
Set maximum on-licence trading hours at:
- **Entertainment Precinct**: 7am–3am generally and 7am–5am for best-practice premises
- **Central city**: 7am–2am generally and 7am–3am for best-practice premises
- **Suburban**: 7am–midnight.

Proximity to sensitive facilities such as schools, parks, health centres
Creating automatic triggers for the public hearing of applications in specific circumstances puts a District Licensing Committee in the best position to determine whether the location of the proposed licensed premises increases the possibility of alcohol-related harm.

**Recommended approach:**
Create automatic triggers for public hearings for:
- high to medium-risk applications in the Southern Zone within close proximity (100m) of another licensed premises or a sensitive facility, such as a school, park or health centre
- any application next to a sensitive facility
- high to medium-risk, or late-trading applications in the Entertainment Precinct
- any application that attracts public opposition.

Density of licensed premises
Research shows that those who live in the Southern Zone area are disproportionately represented in alcohol-related harm data. Creating automatic triggers for the public hearing of applications in the Southern Zone follows a history of applications being opposed. Restricting the trigger to applications assessed as high-risk and valid public objections means best-practice premises are less likely to be affected.

**Recommended approach:**
Create automatic triggers for public hearings for:
- all new or renewal applications for high-risk applications in the Entertainment Precinct and the Southern Zone
- all applications where density or proximity is raised by submitters as an issue.

**Discretionary conditions**
Discretionary conditions relate to the management of licensed premises and deal with such matters as ensuring the safety of patrons, the enjoyment of an area and measures designed to support safer drinking environments.

**Recommended approach:**
- Provide a list of indicative discretionary conditions the District Licensing Committee may consider when issuing a licence.
- Specify the conditions for late-trading on-licences (trading beyond 2am).
- Specify the conditions for off-licences in the Entertainment Precinct or the Southern Zone.

**Alternative options**
The Council considered many other options in reaching this proposal. How they were assessed can be found in Report 3 of the June 20 Strategy and Policy Committee at Wellington.govt.nz (Your Council/Meetings).
Impact of alcohol on the city

From feedback during the development of the Alcohol Strategy, the Council recognises that alcohol has both a positive and negative impact on Wellington City.

It is important to balance the economic benefit with a harm-minimisation approach that acknowledges community concern about the effects of excessive and inappropriate drinking. The Council has decided to prepare a LAP in order to provide locally relevant policies for licensing in Wellington City to meet its strategic objectives and the needs of its particular communities. The Council views a LAP for Wellington City as an important tool to assist the District Licensing Committee make decisions consistent with the object of the Sale and Supply of Alcohol Act:

(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.

Police and Medical Officer of Health views

The Council cannot produce a draft LAP without consulting with the Police and Medical Officer of Health. Their views are attached as Appendix 1.

How the policy will be applied

We believe having a robust assessment framework that rewards best practice, assesses risk and limits high-risk activity at particular locations and during particular times will promote the safe and responsible supply and consumption of alcohol.

The policy responds to concerns about alcohol-related harm and to local evidence showing that at particular locations and during particular times, the harm experienced is disproportionate to the social and economic benefit.

While some people may consider the risk-management framework set out in the policy too restrictive, the Council believes that any limitations are justified and reasonable.

The Council’s goal is to support safer, more responsible consumption of alcohol in a way that supports a dynamic night-time economy.

We recognise that alcohol is no ordinary commodity, and that communities want to have a say in the licensing process. The policy responds to this in four ways:

1) development of a Local Alcohol Policy
2) public notification requirements
3) a transparent decision-making process that triggers community input in locations that are disproportionately represented in alcohol-related harm data for Wellington City
4) information on the objection process and how to lodge an objection.

The Council also believes operators are in the best position to manage risk. The assessment criteria is such that those with an inherently high-risk business will be capable of lowering their risk profile by investing in their business and supporting best practice.
Risk assessment
On application for a new liquor licence or when renewing an existing licence, the suitability of all elements of the activity will be assessed in relation to impacts on the community, and the operation will receive a risk classification.
This classification will influence the licence fees charged by the Council and the types of conditions that will apply to the licence. The lower the risk, the lower the fees charged by the Council and the fewer restrictions on the licence.
The Act permits councils to recover the total costs of the licensing process. Wellington City Council believes the fees charged should be targeted and proportionate to the risks to properly fund the management of those risks.

Zone management
The Sale and Supply of Alcohol Act 2012 allows local alcohol policies to set maximum trading hours; to apply differently to different areas across the city; and to apply differently to premises for which licences of different kinds are held, or have been applied for.
In addition to a location-based approach to trading hours, decisions will also distinguish by kind of licence and (as required) by types of premises in the application of trading conditions. This is to meet the objectives of the Act and the Council’s own strategic goals, particularly around bringing a change in the mix of trading activity in particular areas of the city.
The four areas subject to specific trading conditions are identified as:
- **Suburban Areas** – where the overriding priority is to ensure the locality is a pleasant and agreeable place to live alongside vibrant suburban centres
- **Central Area** – where the overriding priority is to ensure the city has broad appeal through a range of activities, accessibility, and the actual and perceived image of a welcoming, safe place
- **Entertainment Precinct**: Courtenay Place to Cuba Street – where the overriding priority is to balance vitality and vibrancy with safety and harm reduction
- **Southern Zone** – identified as an area/s overrepresented in alcohol-related harm data, the overriding priority here is to reduce harm.

Refer maps attached as Appendix 2

Comprehensive alcohol-related planning
As part of its management strategy, the Council is developing a comprehensive Implementation Plan to consider other initiatives to address broader alcohol-related concerns. This ‘big-picture’ plan will make sure we have a consistent citywide approach to alcohol management. It is important that the initiatives in the Local Alcohol Policy are supported by a whole-of-Council approach to addressing the impact that alcohol-related harm has on the city.
FREQUENTLY ASKED QUESTIONS

What is a Local Alcohol Policy (LAP)?
The Sale and Supply of Alcohol Act 2012 allows councils to develop local alcohol policies covering the licensing of premises that sell and supply alcohol within their territorial areas.

What can a LAP deal with?
A LAP can only deal with matters related to licensing. Through a LAP, communities are able to influence how the District Licensing Committee and Alcohol Regulatory Licensing Authority consider the following matters:

- the location of licensed premises near certain types of facilities, such as in specific suburbs or near schools or community facilities
- the density of licensed premises by specifying whether further licences or types of licences should be issued for premises in the district or in a particular area
- ‘one-way-door’ conditions for licensed premises that would allow patrons to leave premises but not enter or re-enter after a certain time
- discretionary conditions on a licence
- restrictions or extensions to the maximum trading hours in the new Act which are: 8am–4am the following day for on-licences (such as bars, cafés, restaurants) and 7am–11pm for off-licences (such as bottle stores and supermarkets)
- a LAP may apply differently to different kinds of licensed premises.

Why is Wellington Developing a LAP?
Wellington City Councillors voted unanimously in November 2012 to develop an Alcohol Management Strategy that would form the basis for a Local Alcohol Policy before the Local Body Elections in October 2013.

The LAP is to have approved provisional status and be ready for notification by 18 December 2013 (a requirement of the legislation).

There was strong support for having the LAP in place as soon as possible to take account of the particular needs of Wellington’s communities and as a strategically significant economic driver for the region.

What happens if the incoming Council does not like the LAP that is developed by this Council?
The new Council can chose to proceed with notifying the LAP developed by the current Council, start the process again or decide not to have a LAP at all.

Why does the LAP not cover licence fees?
Licence fees are currently being consulted on by the Ministry of Justice and are unlikely to be confirmed by the time the Council considers the provisional Local Alcohol Plan.

Has the community been involved with the development of the draft LAP?
The draft Alcohol Management Strategy and draft LAP were prepared with community input from a comprehensive early engagement programme called The Right Mix? This began with a survey of residents’ views, which were then shared at ward-based workshops, industry and stakeholder workshops, and in online discussion forums. We also set up a broadly representative stakeholder reference group to test and develop ideas.
What happens now?
The draft LAP was adopted by the full Council on 27 June 2013. It is now open for public consultation by means of a Special Consultative Procedure to allow further community input until 2 August 2013. Anyone who is interested can make a submission.

When can I make a submission?
Submissions about the draft LAP can be made from 2 July until 5pm on 2 August 2013.

What happens to the submissions?
The Council has established a Local Alcohol Policy Hearings Subcommittee to consider submissions and then decide whether or not to prepare a provisional LAP and what it will include. The committee will be chaired by Councillor Stephanie Cook. Public hearings for oral submissions will take place in early August 2013. Anyone who makes a written submission and wants their views heard by the committee should make that request in their written submission.

What happens after the public hearings in August?
The Council’s Strategy and Policy Committee will consider all the written and oral submissions and then decide on the final form of the provisional LAP and make a recommendation to the full Council in late September. If adopted by the Council, the provisional LAP will be publicly notified soon after 18 December 2013 and then it will be open to appeals.

What happens after the Council notifies a provisional LAP?
The Act allows for an appeal process to the national Alcohol Regulatory and Licensing Authority. Only a person or agency that has made a submission as part of the Special Consultative Procedure on a draft LAP will be able to appeal against any element of the resulting provisional LAP. The Police and Medical Officer of Health have statutory rights of appeal.

When will the LAP become operational?
Final adoption of a LAP is likely to be mid-2014 at the earliest. There are a number of steps to meet legislative requirements.

The default national maximum hours in the Sale and Supply of Alcohol Act 2012 (8am–4am for on-licences such as pubs and restaurants, and 7am–11pm for off-licences such as bottle stores and supermarkets) apply from 18 December 2013. Premises that currently open for longer hours will have to comply with the maximum trading hours from this date. Premises with shorter hours will continue to operate to the hours of their licence.

As new licences are applied for or existing ones are renewed, the District Licensing Committee and national Alcohol Regulatory and Licensing Authority will refer to the new default hours, other criteria in the Sale and Supply of Alcohol Act 2012 and any Local Alcohol Policy in place, in making their decisions.

How often will the LAP be reviewed?
Legislative requirements mean the LAP must be reviewed every six years, although councils can choose to do this sooner if they wish.
FREQUENTLY ASKED QUESTIONS (CONTINUED)

What are some of the proposals included in the LAP?

The draft LAP is based on a risk-based policy model that rewards best practice, assesses risk, and limits high-risk activity at particular locations and during particular times. This approach will create a hospitality and retail environment that prioritises quality over quantity. Key elements of the draft LAP (attached) are:

- a two-tiered maximum trading hours system for bars, night clubs, and restaurants in the central city (2am–3am in general, 3am–5am in the Entertainment Precinct).
- staggered closing times based on the ability of the licensee to minimise risk (rather than a one-way-door policy)
- maximum trading hours of 7am–9pm for supermarkets, grocers and bottle stores to reduce spontaneous purchasing that may lead to excessive pre-loading and side-loading
- compulsory public hearings for applications close to schools, in the Entertainment Precinct and in the Southern Zone.

The Entertainment Precinct is a response to compelling evidence that late-night trading has a higher risk. The precinct is proposed from Courtenay Place to Cuba Street. Their location reflects the clustering of late-night venues and this is designed to drive late-night activity into well-managed, well-supported and clearly identified zones.

Limiting off-licence trading hours from 7am–9pm. Off-licence purchasing patterns on Friday and Saturday nights show a spike in alcohol-only supermarket purchases from 9pm – purchasing behaviour that is conducive to excessive pre-loading and side-loading. International experience supports restricting trading hours for off-licences so that these premises are closed before at-risk groups move into the city.

I think pricing is an issue; why is there nothing in the policy that restricts the price of alcohol?

Increasing the minimum price of alcohol, particularly for products that attract young people, was a commonly raised solution during The Right Mix? consultation. The Council is not able to place a minimum price on alcohol but we can advocate to the Government to consider this issue together with price advertising.

I live in the Southern Zone, does that mean no more licences will be issued in my area?

No, what it means is that the Council believes that any application assessed as high risk in your zone needs to be reviewed closely and the community given the opportunity to be heard.

The policy says that youth-focused events might not get alcohol licences. Will my school still be able to sell alcohol at a fundraiser?

The Council believes alcohol is not appropriate at some occasions and events. The policy will require the District Licensing Committee to look carefully at the nature of the proposed occasion or event. For example, the committee is unlikely to have concerns about alcohol being sold for off-site consumption (ie a bottle of wine or craft beer to take away) but may consider setting up a bar at a school fundraiser an inappropriate activity.

What will the draft LAP do about off-licences and on-licenses wanting to set up where there is local opposition?

In all cases where valid objections are received to an application, the District Licensing Committee is required to hold a public hearing.
I currently operate a licensed venue in Wellington, how will the trading-hour restrictions impact on me?

<table>
<thead>
<tr>
<th>Impact of Government’s default trading hours and draft policy limits on existing operators</th>
<th>18 December 2013 – default trading hours apply.</th>
<th>When LAP is adopted and becomes operational – mid-2014</th>
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<tbody>
<tr>
<td>I operate an on-licence in the Central Area until 6am but I am outside the new Entertainment Precinct.</td>
<td>You will only be able to operate until 4am.</td>
<td>You may continue to operate until 4am until your licence is renewed. At that point you will be assessed to determine your eligibility to operate until 3am.</td>
</tr>
<tr>
<td>I operate an on-licence until 6am in what will be the Entertainment Precinct.</td>
<td>You will only be able to operate until 4am.</td>
<td>You may continue to operate until 4am until your licence is renewed. At that point you will be assessed to determine your eligibility to trade until 5am.</td>
</tr>
<tr>
<td>I operate an on-licence until 3am in what will be the Entertainment Precinct.</td>
<td>No change. You operate to the lesser condition of 3am on your licence. Note: all operators to trade according to the lesser condition on their licence. Default trading hours are identified limits only.</td>
<td>You continue to operate until 3am. If you wish to be assessed to determine your eligibility to trade until 5am, you can request this when you renew your licence.</td>
</tr>
<tr>
<td>I operate an on-licence until midnight in a Suburban Centre.</td>
<td>No change. You operate to the lesser condition of midnight on your licence.</td>
<td>You continue to operate until midnight. At your next renewal, your business will be assessed to determine your level of risk and if this trading hour limit remains unchanged.</td>
</tr>
<tr>
<td>I operate an off-licence in the Central Area, trading 8am–11.30pm.</td>
<td>You will only be able to operate until 11pm.</td>
<td>You continue to operate until 11pm. When you renew your licence your trading hours will be restricted to the maximum in the policy of 7am–9pm.</td>
</tr>
<tr>
<td>I operate an off-licence in one of the new Entertainment Precincts, trading 8am–11.30pm.</td>
<td>You will only be able to operate until 11pm.</td>
<td>You continue to operate until 11pm. When you renew your licence your trading hours will be restricted to the maximum in the policy of 7am–9pm.</td>
</tr>
<tr>
<td>I operate an off-licence in the suburbs, trading 7am–10pm.</td>
<td>Your hours remain unchanged as they are within the default maximum of 11pm.</td>
<td>You continue to operate your existing trading hours until you renew your licence when your trading hours will be restricted to the maximum in the policy of 7am–9pm.</td>
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HAVE YOUR SAY

The Council is keen to know what you think about this policy. Anyone can make a submission:

- online at Wellington.govt.nz (‘Have Your Say’)
- by calling 499 4444 for more information including a submission form
- by posting a submission form to:
  Freepost 2199
  The Right Mix
  Wellington City Council
  PO Box 2199
  Wellington 6011
- or by emailing a submission to:
  alcoholstrategy@wcc.govt.nz

Please ensure you include the following information:

- Your name, postal address, phone number and email address
- Your submission, with reasons for your views
- Any changes you would like considered
- Whether you wish to speak to the Council in support of your submission (an oral submission).

Councillors will consider all submissions and take account of the issues raised before deciding whether to approve the provisional policy. The process and timetable for this consultation is shown below.

Timeline for consultation

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
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<tbody>
<tr>
<td>5pm 2 July 2013</td>
<td>Consultation begins</td>
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<td>You can also come along to:</td>
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<tr>
<td></td>
<td>• a public information session,</td>
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<td>25 July, 7–9pm, Te Papa</td>
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<td>• a licensee information session,</td>
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<td>17 July, 2–4pm, Te Papa</td>
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<tr>
<td>5pm 2 August 2013</td>
<td>Written submissions close</td>
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<tr>
<td>6–8 August</td>
<td>Strategy and Policy Committee hears oral submissions</td>
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</tbody>
</table>

Submissions close 5pm 2 August 2013

When the public consultation process ends, the Council will consider all the feedback and decide whether or not to approve the provisional Local Alcohol Policy.
APPENDIX 1

The pendulum has swung too far in the direction of relaxed opening hours and the associated increase in crime, disorder and social harm. Being the ‘Entertainment Capital’ in New Zealand we have a unique opportunity to take a stance to reduce victimisation and the associated alcohol-related harm in our city. Now is the time for all of us to make the right choices for the future of our city.

Based on offending patterns, all bars should close at midnight. However, we understand and appreciate that we are a metropolitan city and there is a need to provide night-time entertainment and a place for the public to socialise. With that in mind, the Wellington Police firmly believe that to reduce alcohol-related harm, and to protect our vibrant CBD, licences must be limited to a 3am closing and that a one-way door policy should be introduced from 1am. There are provisions in the Act for special licences to cater for the events that the city hosts.

Crime-data analysis, research and anecdotal evidence from our frontline officers all show that the longer licensed premises are open after midnight the more crime, drink driving and victimisation we see. There are some huge social costs in relation to health, ACC and loss of productivity.

New Zealand research shows that the predicted rate of offences associated with closing later when compared with midnight or earlier is:

- 4.2 times the expected rate of offences between 2.01am and 3am
- 8.9 times the expected rate of offences between 3.01am and 5am.

Police analysis of offending data shows that one-third of all offending in Wellington is concentrated in less than 1 percent of the city’s geographical area in the city’s CBD. The vast majority of this offending occurs between 11pm and 5am on Fridays and Saturdays. Excessive alcohol consumption fuels antisocial behaviour, violence and property damage offending. Does our city need that after 3am?

Wellington Police have been working collaboratively with our partners since November 2011 on the CBD Safety Project which has seen some reduction in violence and theft offending.

While significant inroads have been made in reducing alcohol-related harm and offending in the CBD, reducing the availability of alcohol must be the next step to reducing alcohol-related harm and it is too important not to change. You will not create vibrancy in a city that is not safe.

The decision must be made. How much harm does the community wish to tolerate and is vibrancy in our city being able to consume alcohol until six in the morning? The pendulum has gone too far and it’s our duty and responsibility to rebalance the social harm that alcohol is causing in the safest little capital in the world.
Medical Officer of Health Position Statement

The Object of the new alcohol legislation is about the “safe” and “responsible” sale and supply of alcohol so as to minimise “harm” caused by “excessive or inappropriate consumption of alcohol”. “Harm” is very broadly defined to include health outcomes as well as impacts on social well-being at the level of the individual and at a societal or community level.

As Medical Officer of Health for Wellington I am concerned about the high local impact of the “excessive or inappropriate consumption of alcohol” is having on alcohol-related injury and chronic illness. This will now be placing a significant economic burden on the Wellington region in terms of the direct cost of treatment, re-allocation of resources away from other important health needs, and associated loss in productivity. This economic burden is entirely preventable and the magnitude of this burden should be balanced along with the perceived economic benefits of the more permissive sale and supply of alcohol that appeared over the last two decades. There is considerable evidence that the pendulum has swung too far and there is a need for the pendulum to swing back to a point of equilibrium that is more appropriately aligned to the “safe” and “responsible” sale and supply of alcohol.

A key strategy to address the alcohol issue is to reduce the accessibility of alcohol by reducing outlet density and days and hours of sale. Through the Local Alcohol Policy the Council is provided with the tools to immediately limit the days and hours of sale and, in the long term, to reduce the density of outlets. For the first time ever I can provide to Council an analysis of Emergency Department data that characterises the impact of alcohol on young people in Wellington City. This analysis shows that problem binge drinking and “pre-loading” is predominantly taking place in the Southern, Lambton and Eastern wards. Mt Cook, Te Aro, Newtown, Brooklyn, Island Bay, Miramar/Strathmore Park and Kilbirnie/Melrose stand out as problem areas and the likely sources of their low price alcohol are local supermarkets and liquor stores. I will be able to provide, sometime in the future, information on the magnitude of chronic illness linked to alcohol. However, limiting accessibility to alcohol supplied by suburban supermarkets and liquor stores will be a key prevention strategy. It appears that the evidence supports the need to rebalance the pendulum for suburban communities and neighbourhoods.

I strongly support the immediate reduction in days and hours of sale for supermarkets and liquor stores to 9am to 9pm, with preference for a further reduction in hours for suburban supermarkets and liquor stores located in the southern wards to 8pm on Monday to Thursday, 9pm on Friday and Saturday, and 6pm on Sunday. This is in line with the recent decision of the Liquor Licensing Authority with respect to a suburban liquor store in Cannons Creek, Porirua. Caps and sinking-lid policies should be used to address the high levels of outlet density in the communities and neighbourhoods already mentioned.

For the CBD I support the Police view that closing time should be 3am. The Police have the best understanding of the nature of the social harms relating to law and order. Much of the harm that occurs in the CBD is directly linked to the pre-loading taking place in the suburbs already mentioned and other cities. Nevertheless there is strong international evidence that shifting back early morning closing hours for bars does lead to fewer ED attendances. Notions around “rhythm of the city” and “entertainment precincts” are attractive and are worth exploring further. It is my view that the pendulum needs to be rebalanced first and then relaxation of the 3am closing time can only be considered in terms of the economic benefits significantly outweighing the economic burden of the harm.

Making progress on reducing alcohol accessibility is an important step in addressing the issue of alcohol-related harm but by itself will not solve the problem. New Zealand will also need to look at raising alcohol prices, raising the purchasing age, reducing marketing and advertising, and strengthening drink-driving counter-measures.
APPENDIX 2

Wellington Central City Entertainment Precinct

Legend
- Entertainment Precinct
- Southern Zone
- Central City Zone