

Submission on Auckland Council's Draft Local Alcohol Policy

14 July 2014

Submission re Draft Local Alcohol Policy
Attention: Brina Burden
Freepost Authority 182382
Auckland Council
Private Bag 92300
AUCKLAND 1142d

This submission is made by **Sisters of Mercy Wiri**.

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We wish to speak in support of the submission.

Thank you for the opportunity to provide comment on Auckland's Draft Local Alcohol Policy.

The organisations listed below have read and considered the following submission and endorse its content and recommendations:

Wiri Central School

Principal
Jan Donaldson

Manukau Maori Wardens

Chairman
Gordon Wright

RaWiri Residents Assn

Chairperson
Elizabeth Kiriona

Friendship House

Chief Executive
Vicky Sykes

INTRODUCTION

Sisters of Mercy Wiri is a small community based agency whose mission is to work with the poor, especially women and children, to build positive relationships that strengthen families and communities and to work with others for a just and compassionate society. Our ministry includes advocacy, housing and tenancy concerns, responding to immediate need, supporting family/whanau and children, home visits and visiting those in prison and providing information and referral.

A Local Story

Sisters of Mercy Wiri are concerned about the negative effects that alcohol has had on our community. These effects have been evident since 1988 when we began living and working in Wiri. Two more recent interventions we have been involved in which have reduced alcohol related harm in our community and which have resulted from community action are the stopping of alcohol sales from the Rata Vine superette in 2008 and the introduction of 24 hour Liquor Bans applied to recreation areas, parks and reserves in 2011.

Groups of young people congregating and drinking in our parks and reserves has declined significantly. In addition, alcohol related incidents of anti social behavior, violence, vandalism and graffiti has decreased. As well, the parks and reserves are not as heavily littered with broken bottles, discarded cans and rubbish.

It is evident from these two local examples that legislation or bylaws to reduce alcohol related harm does have a marked effect.

GENERAL COMMENTS

Sisters of Mercy Wiri are aware that there is both national and international evidence that shows that reducing the availability and accessibility of alcohol by limiting the time in which it can be sold and reducing the number and density of alcohol outlets significantly reduces the rates of alcohol related problems such as assaults, antisocial behavior, underage drinking, domestic violence, drink driving, homicide, suicide and child mistreatment.

We commend the Auckland City Council for undertaking the development of a Local Alcohol Policy for our city.

We support the approach that Auckland Council has taken by recognizing that a combination of evidence-based policies are needed to address the complex situations associated with alcohol misuse. We do however, have concerns that some of the proposed criteria does not go far enough to address the impact that the availability and accessibility of alcohol has on vulnerable people, the central city and local communities.

BROAD AREAS and PRIORITY OVERLAY

Sisters of Mercy Wiri gives general overall support to the concept of three priority areas: Broad Area A, Broad Area B and Priority Overlay.

However, we note that the definition as applied, from our perspective, is inadequate for the Manukau area in which we live and work, and around which we have concerns. The Priority Overlay Area for Manukau (p82 Draft Local Alcohol Policy 2014) omits a large section of the Manukau business area, as well as a section of the Great South Road, immediately south of where the Priority Overlay Area finishes now, to where the Great South Road meets Browns Road.

It seems that if the policy is adopted as is, licences would increasingly congregate in the areas pinpointed above. Already, there are a significant number of bars and off licence premises within these areas.

Manukau Business Area

There are several premises in existence in the main business area of Manukau already that appear to fall outside the Priority Overlay Area shown on p82 of the Draft Local Alcohol Policy. With the recent development of this area, for example, the railway station, MIT campus and apartment living, the potential for restaurants and licensed premises is increasing within the unclassified parts of the business centre. To avoid the regulations imposed by the Draft Local Alcohol Policy new premises would move to an unregulated part of the business area.

Great South Road

The ribbon of the Great South Road cited begins with the Vodafone Events Centre. At this point, across the road from the Events Centre, are houses on the edge of a vulnerable neighbourhood where the residents are predominantly low paid workers or receiving a benefit and living in state houses.

Adjacent to the Vodafone Events Centre on the other side of the road, is another neighbourhood known as Rata Vine, also at risk. Between Rata Vine and the Vodafone Events Centre there is a cluster of mainly eating and some licensed premises (including Lone Star Manukau, O’Ryan’s Irish Bar and Buffet King Restaurant and Bar) as well as an off licence establishment, (Super Liquor). Children walk along the Great South Road, across the road from these establishments when walking to the local school, Wiri Central School.

Beyond this second cluster of houses is another licensed eating establishment, the Happy Days Restaurant and Bar. Then just a short distance further along the Great South Road where it meets Browns Road there is another off license shop, Discount Liquor.

Sisters of Mercy Wiri recommend

- that the section of the Great South Road south from the exit ramp from SH1 to where it meets Browns Road is included in the Priority Overlay Area for Manukau.
- the main business area of Manukau be included in the Priority Overlay Area for Manukau

- specific criteria to assess for risk of alcohol related harms be included in the Local Alcohol Policy so that communities can be added to the priority areas over the life of the policy, in order that problems can be prevented as well as remedied.

MAXIMUM TRADING HOURS

Sisters of Mercy Wiri support

the idea of Auckland's trading hours being more restrictive than the Default National Maximum trading hours. However, we do not think the proposed hours are adequate.

We recommend further restricting the maximum trading hours to the following:

On-licences:

10.00am to 2.00am	for Broad Area A (central city and the Manukau City Centre)
10.00 am to 12am	for Broad Area B (the rest of Auckland)
10.00am to 12am	for clubs/restaurants/cafes/function centres and wineries/ winery restaurants
8.00am to 4.00am	for special licences

Off-licences:

10.00am to 9.00pm. No exemptions for supermarkets

We do not support any on-licences (or any other licence) being able to apply for an extension of trading hours.

While we are aware that the proposed extension of trading hours would only apply to best practice operators we believe better options are available to recognize best practice.

NUMBER, LOCATION, and DENSITY of LICENCED PREMISES

Sisters of Mercy Wiri recommend

that a permanent freeze or "regional cap" on all new on and off-licences be applied for the entire duration of the policy

The Environmental and Cumulative Impact Assessment (ECIA) and rebuttable presumption could be applied to consider all types of licence applications.

We recommend

that a 'sinking lid' option be included in the policy, and that this applies to both off an on-licences in priority areas.

We support

the use of the ECIA to take the proximity of alcohol outlets to schools and other sensitive sites into consideration however, we would like this issue to be more directly addressed.

We recommend

that specific proximity controls are put in place to restrict the location of alcohol outlets near to 'sensitive sites' such as schools, health and child care facilities and other sites that communities identify as sensitive.

DISCRETIONARY CONDITIONS and ONE-WAY DOOR POLICIES

Sisters of Mercy Wiri support the use of discretionary conditions and the list of conditions proposed in the draft policy. However, we think that the LAP could be further strengthened.

We recommend that

- A condition to restrict the advertising of alcohol on all licensed premises within a specified distance of identified sensitive sites be included.
- Discretionary conditions are applied consistently across Auckland by licence type to minimize inconsistencies.
- A mandatory one-way door policy be introduced for all on-licensed premises in Broad Area A operating beyond 12am, and that this apply for two hours prior to closing times.
- A discretionary one-way door policy be introduced for on-licensed premises in Broad Area B, and apply to at least one hour prior to closing times.
- A monitoring and evaluation programme be established to assess the effectiveness of the one-way door policy in Auckland.

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Community Social Worker

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Community Social Worker