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**Waitai**  
**Waitai Coastal-Burwood-Linwood Community Board**  
**Submissions Committee**  
**MINUTES ATTACHMENTS**

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**Date:** Thursday 8 May 2025  
**Time:** 4.08pm  
**Venue:** Boardroom, Corner Beresford and Union Streets,  
New Brighton

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**SUBMISSION TO:** Christchurch City Council

**ON:** Draft Local Alcohol Policy 2025

**BY:** Waitai Coastal-Burwood-Linwood Community Board

**CONTACT:** Paul McMahon  
Chairperson, Submissions Committee  
C/- PO Box 73023  
CHRISTCHURCH 8154  
021 184 1072  
[paul.mcmahon@ccc.govt.nz](mailto:paul.mcmahon@ccc.govt.nz)

## 1. INTRODUCTION

The Waitai Coastal-Burwood-Linwood Community Board appreciates the opportunity to make a submission to the Christchurch City Council on the Draft Local Alcohol Policy 2025.

The Board wishes wish to be heard in support of this submission.

## 2. SUBMISSION

### **Reduction in off-licensed maximum trading hours to 9pm.**

#### **Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?**

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

Yes

Please tell us why you support this proposal.

We know from the evidence gathered by the Council that a significant portion of alcohol related harm occurs between 9pm-12am. We also know from New Zealand<sup>1</sup> and international evidence<sup>2</sup> that earlier off-license closing reduces harm.

### **Place a freeze on new off-licences in high deprivation areas.**

#### **Do you support a freeze on granting an off-licence to new premises in areas that service high deprivation communities (decile 8, 9 and 10)?**

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

Yes

Please tell us why you support this proposal.

We support the freeze because high-deprivation communities already have an undue burden of alcohol harm and too many off-licenses. If people want to open new bottle stores they should do it in places that are not as vulnerable.

<sup>1</sup> Taisia Huckle, Jose S. Romeo, Karl Parker, and Sally Casswell, "The Impact of Alcohol Trading Hour Restrictions on Night-Time Violence in New Zealand," *Injury Prevention* 26, no. 2 (2020): 173–179, <https://doi.org/10.1136/injuryprev-2019-043243>.

<sup>2</sup> Jo-An Atkinson et al., "Impacts of Licensed Premises Trading Hour Policies on Alcohol-Related Harms," *Addiction* 113, no. 7 (2018): 1244–1251, <https://doi.org/10.1111/add.14178>

Higher alcohol outlet density and proximity in deprived areas of New Zealand are associated with increased alcohol consumption, hazardous drinking, and related harms, including crime.<sup>3</sup>

**Restricting new bottle stores' proximity to sensitive community facilities.**

**Do you support restricting new bottle stores from opening within 200 metres of addiction treatment/rehabilitation centres, primary schools and secondary schools in all Christchurch suburbs except Banks Peninsula and inside the central city (inside the four avenues)?**

Yes

Please tell us why you support this proposal.

New Zealand research provides robust evidence linking alcohol advertising to increased consumption, particularly among youth.

New Zealand children are regularly exposed to alcohol marketing across various environments (an average of 4.5 times a day), with higher exposure rates among Māori (5 times more than 4.5 times a day) and Pacific children (3 times more than the 4.5 times a day). The vast proportion (75%) of this advertising is from nearby licensed premises. The majority of schools (56%) have at least one alcohol advertisement within 500m, and 63% of those advertisements were near low-decile (i.e. deprived) schools.<sup>4</sup>

**Restricting new bottle stores' proximity to sensitive community facilities.**

**Do you support restricting new bottle stores from opening within 100 metres of addiction treatment/rehabilitation centres, and 50 metres of primary schools and secondary schools within the central city (inside the four avenues), and exempting the City Centre Zone?**

No comment

**Restricting new bottle stores' proximity to sensitive community facilities.**

**Do you support restricting new bottle stores from opening within 50 metres of addiction treatment/rehabilitation centres, and primary schools and secondary schools in Banks Peninsula (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?**

No comment

<sup>3</sup> Jennie L. Connor, Kypros Kypri, Melanie L. Bell, and Kimberly Cousins, "Alcohol Outlet Density, Levels of Drinking and Alcohol-Related Harm in New Zealand: A National Study," *Journal of Epidemiology and Community Health* 65, no. 10 (2011): 841–846, <https://doi.org/10.1136/jech.2009.104935>;

Matthew Hobbs, Lukas Marek, Malcolm Campbell, and Joreintje D. Mackenbach, "Associations between Alcohol Outlets and Crime and Disorder in New Zealand: A National Study," *Health & Place* 65 (2020): 102397, <https://doi.org/10.1016/j.healthplace.2020.102397>;

Gordon C. Hay, Paul Whigham, Kypros Kypri, and Jennie L. Connor, "Neighbourhood Deprivation and Access to Alcohol Outlets: A National Study," *Health & Place* 15, no. 4 (2009): 1086–1093, <https://doi.org/10.1016/j.healthplace.2009.05.008>;

Public Health Communication Centre, "Local Alcohol Policies—What's the Opportunity to Reduce Harm?" (Policy Briefing, 2024), <https://www.phcc.org.nz/briefing/local-alcohol-policies-whats-opportunity-reduce-harm>.

<sup>4</sup> Sneyd, Sarah, Noor Al-Jebouri, Helina Gifawossen, Nathan Cowie, and Nicki Jackson. "Alcohol Advertising Near Schools in Tāmaki Makaurau Auckland." *New Zealand Medical Journal* 136, no. 1584 (October 20, 2023). <https://nzmj.org.nz/journal/vol-136-no-1584/alcohol-advertising-near-schools-in-tamaki-makaurau-auckland>.

### General feedback

#### Do you have any other comments?

The Board supports the very modest proposals in the Draft Local Alcohol Policy 2025 and is especially pleased to see a focus on off-licenses, where the vast bulk of alcohol is purchased from for the lowest price.

We note that there is a new bottlestore application in Avonside that would be precluded if the Draft Local Alcohol Policy 2025 were adopted: in a deprived area (decile 8, where 10 is the most deprived) and ~160m from a primary school and kindergarten.

The Board notes that many of the most deprived areas of Christchurch are within the Waitai Area, so our communities stand to benefit the most from more stringent measures like those proposed in the Draft.

The Board supports the goal of a vibrant hospitality sector and notes that it is important suburban villages like New Brighton are easy places for suitable applicants to obtain on-licenses, provided there is robust oversight ensuring host responsibilities are met.

### Licences

#### Finally, do you currently hold any of the following (select all that apply)?

The Board and or its members do not hold a liquor licence.



Paul McMahon  
Chairperson, Submissions Committee  
**WAITAI COASTAL-BURWOOD-LINWOOD COMMUNITY BOARD**

8 May 2025