

1 May 2019

Wellington City Council
PO Box 2199
Wellington 6140

To Whom It May Concern

Re: Alcohol Control Bylaw - Kilbirnie and Kelburn

Thank you for the opportunity to provide a written submission on this consultation.

Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Capital & Coast, Hutt Valley and Wairarapa and as a service is part of the Hutt Valley District Health Board.

We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

Our service delivery includes work to reduce alcohol related harm in Wellington City and we are one of the three reporting agencies in the *Sale and Supply of Alcohol Act 2012* reporting on liquor licence applications.

We are happy to provide further advice or clarification on any of the points raised in our written submission. We wish to appear before the committee to speak to our written submission.

The contact point for this submission is:

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Kind regards

Dr Stephen Palmer
Medical Officer of Health

Peter Gush
Service Manager

Response to consultation questions

We thank Council for further continuing their liquor ban consultation and acknowledge their commitment to addressing the needs of these communities.

1. Do you support the proposal to create an alcohol ban area in the Kilbirnie area - shown as 'A' in Figure 1?

Regional Public Health (RPH) supports the liquor ban if it is used with appropriate discretion and is supported by a range of activities to address the particular needs in Kilbirnie that will further assist the desired change. Police and community evidence shows an area with significant antisocial behaviour impacting on the community. A liquor ban is an accepted tool that when used with discretion is useful in controlling such behaviour and can reduce the impact of alcohol misuse in the community.

To enable effective solutions to be implemented it is important to understand the core features and the drivers of the presenting social problems. It will be important for Council, Police and RPH along with other agencies to work collaboratively to address the underlying problems to better support change in the community. It is our understanding the issues in Kilbirnie may be derived from both alcohol misuse and possibly drug use and distribution, primarily from a small number of residents within the area. It is also plausible that others are being drawn to the area if drug supply and use is a defining problem. It is our understanding that rough sleeping or homelessness is not a significant feature of the issues although it may not be entirely absent.

A core concern for us is that those with dependence and addiction issues receive the appropriate health and social assistance to foster change in their lives. This is not as easy as it sounds and requires a thorough knowledge of the driving issues with sustained support to create change in their life circumstances. A collaborative approach coming from an understanding of the personal and community context with engagement of the appropriate services will provide the best opportunities for improvement.

RPH is less supportive of liquor bans where rough sleeping and homelessness driven by substance abuse are found to be the core features of the antisocial behaviours. A liquor ban in this situation would prompt relocation and it would be more difficult to connect those needing support to the appropriate services.

2. Do you support the proposal to establish an alcohol ban area in Kilbirnie Park and the surrounding streets - shown as 'B' in Figure 1?

RPH supports the introduction of an alcohol ban in area B. The concerns expressed by the community hub and sports centre are important to acknowledge and it would not be unexpected that the antisocial behaviours could be relocated here and exasperate the existing problems.

3. If an alcohol ban was created in Kilbirnie, do you support it being in place 24 hours, seven days a week?

RPH supports the ban being 24 hours, seven days a week if it can be demonstrated that the issues connected with the public place consumption of alcohol occur across that period. The evidence from community submissions would suggest this is appropriate. Other agencies may be able to provide greater clarity.

4. Do you support the proposed change to the alcohol ban area in Kelburn Park shown in Figure 2?

RPH supports the introduction of an alcohol ban in Kelburn Park. The park is a well-known public location for the consumption of alcohol. Our concerns regarding the misuse and excessive consumption in the tertiary population are well known to Council and we continue to present health information to Wellington District Licensing Committees in efforts to reduce alcohol related harm. Excessive consumption is impacting on student health and likely their performance, as well as diminishing the amenity and good order of the area creating stress and welfare issues for residents.

We acknowledge that Victoria University has adopted a number of approaches in efforts to reduce alcohol related harm; such as increased security, social norm approaches where greater visibility is made of students' non-drinking or moderate consumption, support for students with problem consumption and restorative justice for those adversely impacting on their local communities. These policies at Victoria may be making some impact on hazardous consumption alongside a general culture shift in the younger population associated with the increasing interest in healthy living and sustainability.

NZ research shows that policy and wider environmental changes are contributing to a small reduction in the tertiary student prevalence of drinking to intoxication and the prevalence of drinking generally¹. However excessive consumption levels are still too high. Further this reduction in consumption is not necessarily visible for those living alongside student populations. Increased student numbers means the population level reduction in harm is less visible in these communities. With student numbers expected to grow further the problem is not likely to be resolved in the short term.

We expect the introduction of a ban to have a dampening effect on the consumption of alcohol in public and would not result in a total transfer of the problems to another location, particularly if adopted with further actions to reduce consumption and harm. Concerns about displacement could be well managed through an evaluation of the ban. We would be willing to work with interested agencies, the university and students to assess the ban's impact and progress further strategies to reduce alcohol harm in the tertiary population.

¹ Kypri, K. Maclennan, B. Cousins, K. Connor, J. 2018. Hazardous drinking among students over a decade of university policy change: Controlled before and after evaluation. International Journal of Environmental Research and Public Health 15, 2137 [file:///H:/Downloads/Chrome/ijerph-15-02137%20\(1\).pdf](file:///H:/Downloads/Chrome/ijerph-15-02137%20(1).pdf)

5. If an alcohol ban was established in Kelburn Park, do you support it only being in place between the hours of 8pm and 8am, seven days a week?

It is our understanding that students are more likely to be drinking in Kelburn Park in the evenings and the evenings are more problematic for residents. We therefore support the 8pm to 8am time frame for the ban.

6. Have you experienced any alcohol related crime or disorder in any of the proposed areas?

Kilbirnie

Kilbirnie residents exhibit higher levels of hospital admissions from intoxication and alcohol poisoning being in the top 10 per cent worst in the Wellington region. The crude rate which measures the actual level of harm in the resident population area units places Kilbirnie East at 15th and Kilbirnie West-Haitaitai South at 17th in the region. The standardised rate which gives each population the same demographic make-up ranks Kilbirnie East at 14th and Kilbirnie West-Haitaitai South 11th. This means that the harm here is less defined by the age make-up of the residents where young people tend to be more hazardous drinkers. Residents here have more hazardous consumption behaviours than their peers of a similar age regionally.

Kelburn

Kelburn Park is a large sports ground situated in the Lambton area unit bordering Kelburn. The majority of the university hostels which house predominantly first year students are located in the Lambton area unit in close proximity to the park, see maps attached.

NZ studies have found a higher prevalence of hazardous drinking among students when compared with their non-student peers with first year students at particularly high risk². The population crude rate of acute hospital admissions for alcohol intoxication and alcohol poisoning in Lambton and Kelburn place them in the 10 per cent worst areas in the Wellington region. Lambton ranked 2nd and Kelburn 11th. Assessment of the standardised rate where each area unit is assigned the same population demographics has Lambton still ranked 2nd and Kelburn drops to 28th. This demonstrates that for Kelburn the level of harm is partially accounted for by the demographic age makeup having a high proportion of young people who tend to drink more hazardously than the population generally. However in Lambton the standardised rate demonstrates that the behaviours of the young people in this area are more extreme than young people's drinking habits regionally and mirrors the national research which shows first year students to be at very high risk.

² Kypri, K.; Cronin, M.; Wright, C.S.; Do university students drink more hazardously than their non-student peers? *Addiction* 2005, 100, 713–714. <https://onlinelibrary.wiley.com/doi/epdf/10.1111/j.1360-0443.2005.01116.x>

Appendix

Figure 1: Aerial View of Kelburn Park and Surrounds

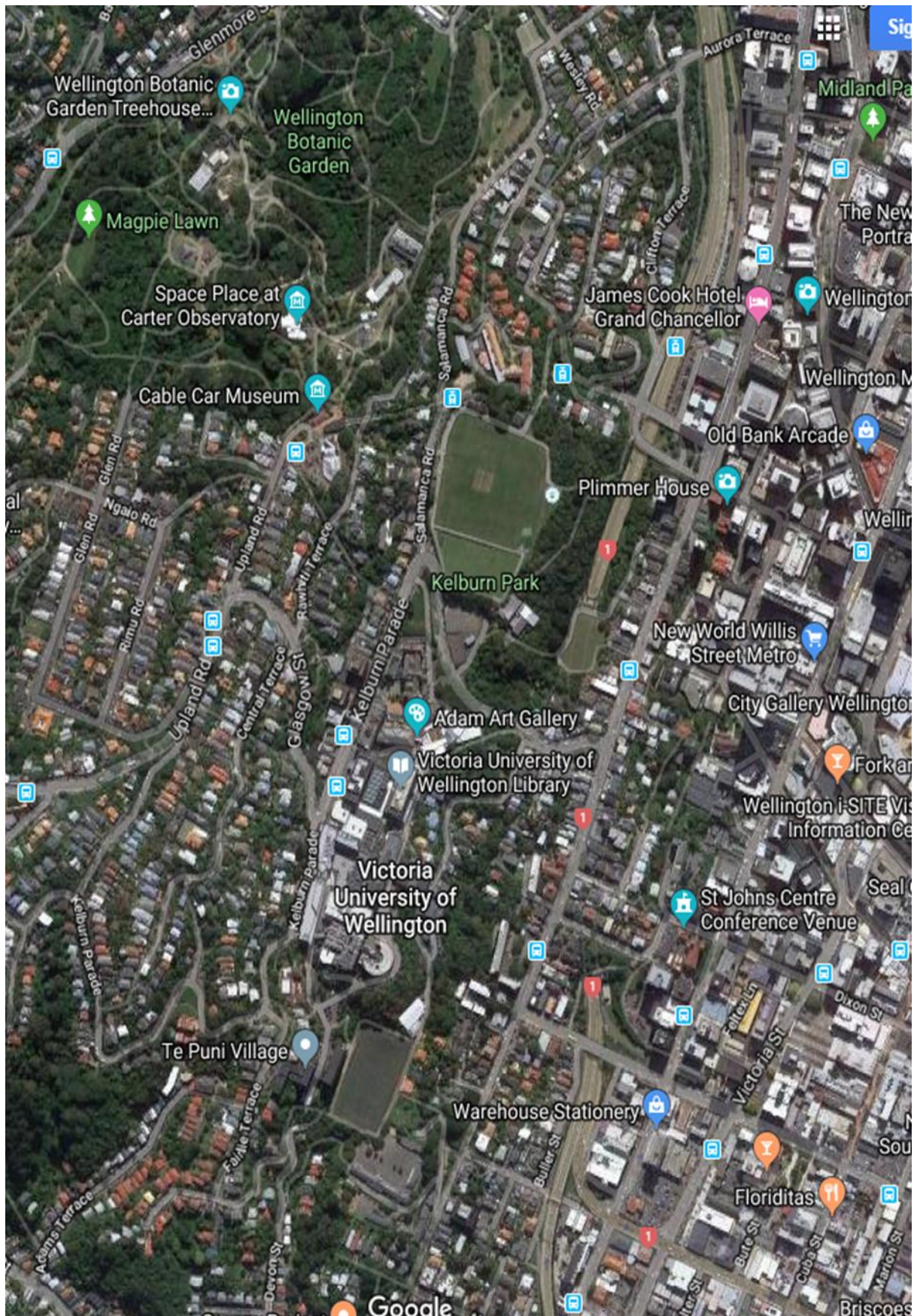


Figure 2: Student Hostels and Area Unit Location

