



Submission on the Auckland Council draft Annual Plan 2013/14

25th February, 2013

Alcohol Healthwatch is an independent charitable trust working to reduce alcohol-related harm. We are contracted by the Ministry of Health to provide a range of regional and national health promotion services. These include: providing evidence-based information and advice on policy and planning matters; coordinating networks and projects to address alcohol-related harms, such as alcohol-related injury, fetal alcohol spectrum disorder, supply to minors and tertiary student drinking; and coordinating or otherwise supporting community action projects.

Thank you for the opportunity to submit to the draft Annual Plan 2013/14.

We would appreciate the opportunity to present an oral submission.

If you have any questions on the comments we have included in our submission, please contact:

Amy Robinson

Health Promotion Advisor

Alcohol Healthwatch

P.O. Box 99407, Newmarket, Auckland 1149

P: (09) 520 7038

Introduction

In our previous submissions to Auckland Council plans we have outlined the important roles that local government can play in preventing and reducing alcohol-related harms. The role of local government has recently become even more significant in changing the landscape of alcohol in our communities with the introduction of the new Sale and Supply of Alcohol Act 2012.

The ability for local government to develop a local alcohol policy means that communities will now have a say on local liquor licensing matters. Local government will also be in charge of appointing the District Licensing Committees, administering regulatory functions under a broader set of criteria than the previous Act allowed and administering a system for risk-based licensing fees.

Our comments highlight particular areas of relevance for the Annual Plan's prioritising of projects/activities and financial forecasting, and relate to the time period for operation – 1 July, 2013 – 30th June, 2014.

The submission has four parts;

1. General comments,
2. Comments for Auckland Council based on activity themes,
3. Comments for Local Boards and
4. An appendix which includes previous recommendations Alcohol Healthwatch has made to the Auckland Council planning processes.

We believe our comments are complementary to the Auckland Council's alcohol harm reduction strategy, Council's broader programme of alcohol work and align with Auckland Council's engagement in the collaborative regional alcohol harm reduction plan which Alcohol Healthwatch are facilitating.

1) General comments about the draft Annual Plan

We were able to identify only one specific alcohol-related performance measure in the plan; there are no other real alcohol-related commitments evident in the plan. Over the next 12 months there are a number of key planning opportunities that Auckland Council will be involved in such as the Unitary Plan, bylaw consultation and Local Alcohol Policy development. It is imperative that there is adequate funding and processes are in place to ensure these are effective. For example the Local Alcohol Policy requires Council to undertake a special consultation process as described in the Local Government Act. This process could fall in the year covered by this Annual Plan.

- We recommend that alcohol-related harm reduction measures are integrated throughout all of Auckland Council's planning processes, and across all Council domains, and
- That the Annual Plan includes reference to Auckland Council's alcohol programme of work and its related strategy, and that appropriate resources are allocated to implementing these activities.

Secondly, Alcohol Healthwatch has been facilitating an Executive Planning Group since May 2012 to develop a regional plan for reducing alcohol-related harm in Auckland. This group includes high level representation from the NZ Police, Māori Public Health, Health Promotion Agency, treatment sector,

Auckland Regional Public Health, SHORE Whariki and Auckland Council. We are currently finalising the draft plan before going out to consultation. Following consultation with the relevant sectors the plan will move into its implementation phase. One of the priority areas that the plan identifies is community mobilisation to support effective community input into the Council’s Local Alcohol Policy

- We recommend Council ensure that appropriate mechanisms and resources are in place to support active community engagement and consultation in this area.

2) Relevant comments for Auckland Council based on activity themes outlined in plan

| Annual Plan Activity Themes | Comments/Recommendations |
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| Governance | <p>In previous submissions we have mentioned the inherent conflicts of interest that can arise in the alcohol issue. During the next 12 months, these conflicts of interest will be play out in planning processes such as the Unitary Plan and Local Alcohol Policy development.</p> <p>We recommend that the wider views of community stakeholders and those with a greater public good prioritised over those of vested profit-driven interests.</p> |
| Planning – Unitary Plan | <p>Under the new Sale and Supply of Alcohol Act 2012 the draft local alcohol policy must have regard to the objectives and policies of its district plan among other criteria.</p> <p>We recommend that Council ensure that the Unitary Plan is supportive of the harm reduction measures that will:</p> <ul style="list-style-type: none"> a) support community wishes for a decrease in the number of liquor outlets b) enable residents to have a say in where these are located c) provide a safer community d) improve residential amenity e) have greater recognition of the different environmental effects of alcohol outlets and a balance of land use activities. |
| Planning – Strategy Action Plan | <p>As above.</p> <p>We recommend that planning decisions are based on what the evidence tells us is best for our community wellbeing.</p> |
| Planning – Supporting strategies and action plans | <p>We recommend that the alcohol programme of work is specified in all Council plans.</p> |
| Planning – Local Alcohol Policies | <p>We recommend that the drafting of the local alcohol policy remain focussed on the object of the new Act and community needs. Conflicts of interest need to be managed appropriately</p> |

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| | <p>during this.</p> <p>We recommend that health impact assessments are utilised during this process as well as economic impact assessments.</p> |
| Planning – Research and Monitoring | <p>We recommend that Auckland Council develop a robust monitoring and data collection system as part of Local Alcohol Policy information requirements. It will also assist Council to accurately evaluate investments, fine-tune interventions and improve local intelligence on alcohol-related matters.</p> |
| Planning – Engaging with central government and stakeholders on legislative programmes and key strategic issues | <p>We recommend that Auckland Council make a principled commitment to and actively advocate for the protective policy measures of:</p> <ol style="list-style-type: none"> a) Increasing the price of alcohol by raising the excise tax on alcohol products b) Restricting access to retailed alcohol by decreasing the number of liquor outlets and opening hours c) Restricting/enforcing bans on alcohol advertising d) Lowering the legal adult blood alcohol level for driving to at least 0.05mg/L. e) Raising the minimum purchase age to 20 years for both on-licence and off-licence premises |
| Economic Development | <p>Preventative approaches have been shown to be economically sound.</p> <p>We recommend that Auckland Council take a stronger preventative approach to save on costs associated with keeping communities safe such as CCTV cameras.</p> <p>Some local governments in Australia have examined methods of diversifying their business mix at night by promoting entertainment and economic activity at night that does not rely on alcohol sales. This might assist in redefining the meaning of a ‘vibrant, 24/7’ city.</p> |
| Built and natural environment – Regulatory | <p>Auckland Council needs to ensure its delivery of liquor licensing, monitoring and compliance is of the highest possible standard and that this standard is lifted, rather than the expectation lowered.</p> <p>We recommend that every licensed premise in the Auckland region should have at least 2 inspections annually, rather than a target of 80% of premises visited once annually.</p> <p>We recommend that best practice around designing built environments to reduce alcohol-</p> |

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| | related harms is adhered to. |
| Community | <p>During the next 12 months there will be many opportunities for community engagement and mobilisation to have input into Auckland Council planning processes.</p> <p>We recommend that sufficient strategies and funds need to be put in place to ensure effective community engagement.</p> <p>We recommend that Auckland Council supports community action initiatives to reduce alcohol-related;</p> <ul style="list-style-type: none"> a) Injury including those from drink driving, drowning, falls, b) Violence and crime, c) Availability and promotion, d) Early onset of drinking by young people, e) Heavy drinking/intoxication. <p>Programmes that support these need to be specified in the Annual Plan and appropriate funding allocated to ensure sustainability.</p> <p>Continue to support young people to have active engagement into Council plans and processes.</p> <p>Communities are calling for alcohol-free events. We recommend that where applicable funding needs to be set aside to support this.</p> |

3) Relevant comments for All Local Boards

Alcohol Healthwatch is currently facilitating an Executive Planning Group to develop a regional alcohol-harm reduction plan for Auckland. Priority areas that the Executive Planning Group have identified for the plan include: achieving a robust local alcohol policy, building community capacity and capability to engage in local planning and harm reduction with a particular emphasis on reducing the supply of alcohol to minors, developing a sustainable programme of early and brief intervention and improving data collection and monitoring.

As part of this work, there are a number of areas that we will require further information gathering. For example, the default maximum trading hours for liquor outlets come into law in December 2013 which will be before the Local Alcohol Policies come into effect. This will be an area which would be useful for Local Boards to engage in and to allocate funding for appropriate tools, such as a survey for example, to be developed to gauge community reaction to this change and whether it has affected perceptions of community safety and the like.

In conclusion, we wholly believe that to truly achieve the Auckland Council's vision and goals of the Auckland Plan, the Long Term Plan and the Annual Plan, it is imperative that outcome measures and strategies to reduce alcohol-related harm in Auckland are built into all planning documents.

We look forward to working with you while we navigate our way through the new liquor legislation and ensure that we maximise its opportunities to make a measurable difference in reducing alcohol-related harm in the Auckland region.

4) APPENDIX - Content of previous submissions to Auckland Council on planning for alcohol harm reduction.

By 2022 Aucklanders would have achieved....

| Expected measured outcomes |
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| Reduced number/rate of alcohol-related admissions to Auckland hospitals – both acute and chronic outcomes). |
| Reduced number/rate of alcohol-related assaults (and/or nearest proxy such as night-time assaults) in Auckland. |
| Reduced number/rate of alcohol-related ED presentations (and/or ED presentations overall) in Auckland hospitals. |
| Reduced number/rate and severity of alcohol-related road crashes, and number of deaths and injuries resulting in the Auckland region. |
| Reduced number/rate of alcohol-related treatment episodes (or approximate proxy) in Auckland. |
| Reduced number/rate of alcohol-related ambulance call-outs in Auckland. |
| Reduced number/rate and severity of alcohol-related domestic violence episodes in Auckland. |
| Reduced number/rate of alcohol-related criminal offending and recidivist offending. |

| Strategies to achieve expected outcomes |
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| Overarching policy and planning strategies |
| <ol style="list-style-type: none"> 1. Auckland Council make a principled commitment to and actively advocate for the protective national policy measures of: <ul style="list-style-type: none"> • Increasing the price of alcohol by raising the excise tax on alcohol products • Restrict access to retailed alcohol by decreasing the number of liquor outlets and opening hours • Enforce bans on alcohol advertising • Lower the legal adult blood alcohol level for driving to at least 0.05 • Raise the minimum purchase age to 20 years for both on-licence and off-licence premises. 2. Auckland Council develops its capacity to be an effective contributor to developing, implementing and monitoring an evidence-based alcohol harm reduction plan for Auckland. 3. Auckland Council develops a progressive and evidence-based local alcohol policy that contributes directly to the outcome measures (as stated in the above table). |

4. Alcohol-related harm prevention to be integrated across Auckland Council and its CCOs planning initiatives, for example through Auckland Transport, Environment, Urban planning, ATEED, and Community Safety. An alcohol-specific health impact assessment/checklist could be developed to assist this process.

Liquor Licensing Strategies

5. Auckland Council develops and maintains a geo-spatial database of licensed premises for the Auckland region and this will be made readily accessible to Local Boards and community stakeholders.
6. Apply a graduated response model to liquor licensing monitoring (like the model that the Collaborative Liquor Enforcement Group (CLEG) uses).
7. All premises to have compliance monitoring visits at least twice a year.
8. Problem premises to have covert compliance monitoring visits at least monthly until enforcement action is taken or the problems are otherwise resolved.
9. Investigate the 'two-strikes-out' policy for non-compliant licensees.
10. All new/renewal licence applications are notified to the applicable Local Board.
11. Risk management plans are in place for the Central Business District (CBD) and other areas of licensed premise clustering, and for all premises operating beyond midnight.
12. Auckland Council to work to eliminate the necessity for communities to object to liquor licences in the Auckland region, i.e. effective policies are in place to limit the number, location and density of outlets and to rid the region of poor operators.

Event Management Strategies

13. Auckland Council run events will where possible de-emphasise the role that alcohol plays in the event (for example, the Seafood Festival is about the seafood and not about the booze up).
14. All Auckland Council run family-orientated events are alcohol-free.
15. Other events run by, or in conjunction with, the Auckland Council and its CCOs involving alcohol have comprehensive safety audits prepared and risk management plans in place.
16. Auckland Council, in conjunction with youth friendly service organisations, develops and implements a greater range of youth recreational options that are alcohol-free.

Marketing Strategies

17. No alcohol advertising on Auckland Council property, particularly sports fields, bus shelters and transport hubs.
18. Auckland Council to actively seek/provide alternative sponsorship for Council planned events/activities.

Role Model Employer Strategies

19. Auckland Council to play a leadership role in de-emphasising alcohol and promoting social options that are alcohol-free.

Transport/Road Safety Strategies

20. Auckland Council advocates for a legal adult driving blood alcohol level of 0.05 or less.

21. Auckland Council continues to improve public transport, particularly in rural areas, to provide accessible transport options for people who have been drinking alcohol.

22. Auckland Council actively monitors liquor outlets to ensure compliance with liquor laws and host responsibility measures; ensuring patrons do not become intoxicated and do not drive home.

23. Auckland Council delivers, through Auckland Transport/Road Safe Auckland, evidence-based campaigns to reduce drunk driving and recidivist drunk driving levels in Auckland; including the marine environment and pedestrian safety.

24. Auckland Council works with regional partners to increase the delivery of brief/early intervention programmes for drink drivers, and supports successful implementation of the Drug Court pilot in Auckland.

25. Auckland Council effectively monitors public transport to enforce liquor bans, and also work towards all public transport services being alcohol-free in the Auckland region.

Liquor Bylaw Strategies

26. Auckland Council ensures that liquor bylaws are implemented consistently across the region, they are outcome monitored to ensure they achieve their purposes (such as improving community safety), and that they are enforced, active, visible and non-discriminatory.

Community Action Strategies

27. Community Action/Community Safety/Education programmes are evidence-based, and developed and measured against key performance indicators such as the outcomes provided in the above table.