

18 May 2025

Christchurch Youth Council Submission on the Draft Local Alcohol Policy

Kei te rangatira, tēnā koe,

We are writing on behalf of the Rūnaka Taiohi o Ōtautahi / Christchurch Youth Council, a group of rangatahi volunteers aged 12 - 24 from across the Ōtautahi region. This submission is informed by feedback from 92 young people who completed our online survey on the Local Alcohol Policy, as well as insights gathered through Instagram polls (see attached documents), internal discussions, and a dedicated workshop with our membership of 25 volunteers aged 12 - 24. Our survey was also widely shared throughout Lincoln, resulting in a high number of responses from young people just outside Christchurch. As Lincoln students frequently attend school, events, and social gatherings in Christchurch city, we believe their perspectives are still highly relevant to this submission.

We strongly encouraged young people to submit their own responses to the Christchurch City Council (CCC) survey by frequently promoting it on social media. We also advised young people to complete the CCC survey before responding to ours, as our survey was intended to be supplementary to the official process. To ensure the data we collected was useful to CCC, we incorporated the exact wording from many of their survey questions.

While we acknowledge that we are not representative of all young people in Christchurch, we have a mandate as an organisation to collect, collate, and share the perspectives presented to us by rangatahi. We recognise that young people may hold diverse views on this issue, and we value and respect these differences as part of a broader conversation about youth safety and wellbeing in our city.

Comment on the Role of the Local Alcohol Policy

We understand that a Local Alcohol Policy (LAP) allows councils to set rules for how alcohol is sold and supplied in their district, in line with the **Sale and Supply of Alcohol Act 2012**. We support the Council's use of this tool to help reduce alcohol-related harm in Christchurch and Banks Peninsula.

Young people told us clearly that alcohol has a significant and harmful presence in their lives and communities. They spoke about feeling unsafe near bottle stores at night, the normalisation of drinking in youth culture, and the accessibility of alcohol even for those under 18. We believe the LAP is an important opportunity to respond to these issues.

Policy 1: Reduce trading hours for all off-licences to 9pm daily

We support this policy.

Young people identified late-night alcohol availability as a major factor contributing to unsafe situations. This includes people congregating near bottle stores at night, 'topping up' alcohol after already drinking, and antisocial behaviour in neighbourhoods.

We support reducing off-licence trading hours to 9pm as a clear and effective step toward improving safety and wellbeing. We agree that this will help limit the opportunity for excessive alcohol consumption and reduce harm, especially for vulnerable communities.

Policy 2: Place a freeze on new off-licences in high deprivation areas

We support this policy.

We support placing a freeze on new off-licences in high deprivation areas, as there is already an oversaturation of alcohol outlets in these communities. Increasing access to alcohol in areas already facing significant social and economic challenges only worsens existing harm.

We did not ask a specific question about this policy in our online youth survey. During our workshops, we found that the concept was complex and required additional context to understand properly. To avoid confusion and ensure our survey was accessible to all young people engaging with it, we chose not to include it in the final survey questions.

However, based on wider discussions and the clear evidence of harm associated with the density of alcohol outlets, particularly in high deprivation areas, we support a freeze as a proactive and protective measure for community wellbeing.

Policy 3: Restrict new bottle stores near sensitive sites

We support the proposed restrictions on new bottle stores opening within specified distances of addiction treatment and rehabilitation sites, secondary schools, and primary schools across Christchurch, with varied buffer zones depending on the area:

- **200 metres** in suburban areas outside the central city four avenues

- **100 metres** (addiction treatment/rehab sites) and **50 metres** (schools) within the central city four avenues
- **50 metres** in Banks Peninsula
- The policy excludes the City Centre Zone, recognising its role as the primary destination for dining, nightlife, and entertainment.

We agree these distances provide a practical and proportionate approach to reducing harm near sensitive sites while balancing community needs.

Recommendation: Include Early Childhood Education (ECE) centres with a smaller buffer distance.

While the current policy excludes ECE centres due to their high number and widespread locations, our engagement with young people showed significant concern about alcohol outlets near these centres. We recommend considering a smaller buffer zone of **50 metres**, around ECE centres to acknowledge their vulnerability without making the policy overly complex or impractical.

Additional considerations:

- Distance alone is not sufficient. Location context matters - such as outlets directly on busy bus routes or adjacent to main entrances of sensitive sites, which can have a greater impact even if outside the specified distance.