



19 October 2022

The Secretary
District Licencing Committee
Hutt City Council
Private Bag 31-912
Lower Hutt 5040

Dear Sir/Madam

APPLICATION FOR NEW OFF-LICENCE

Applicant's name: **Fergusson Liquor Limited**
Trading as: Super Liquor, Wainuiomata

Introduction

The above-named applicant has applied for a new off-licence for their premises proposed to be situated at 15 Queen Street, Wainuiomata, Lower Hutt.

Wellington District Police (Police) are opposed to this application on the following grounds:

- The object of the Act
- Any relevant local alcohol policy
- The days on which and the hours during which the applicant proposes to sell alcohol
- The design and layout of any proposed premises
- Amenity and good order

Grounds for Objection

Section 105 Sale and Supply of Alcohol Act 2012 – Criteria for issue of licences

105 (1) In deciding whether to issue a licence, the licensing authority or the licensing committee concerned must have regard to the following matters:

- (a) the object of the Act:
- (c) any relevant local alcohol policy
- (d) the days on which and the hours during which the applicant proposes to sell alcohol:
- (e) the design and layout of any proposed premises:
- (i) whether (in its opinion) the amenity and good order of the locality are already so badly affected by the effects of the issue of existing licences that-
 - i. They would be unlikely to be reduced further (or would be likely to be reduced further to only a minor extent) by the effects of the issue of the licence; but
 - ii. It is nevertheless desirable not to issue any further licences:
- (k) any matters dealt with in any report from Police, an inspector, or a Medical Officer of Health made under section 103.

Local alcohol policy:

Police are concerned for the Wainuiomata community because of the perceived over representation of off-licence premises in the Wainuiomata suburb and the known consequences of alcohol-related harm for this area.

The Hutt City Council has a local alcohol policy (LAP) in place and there is a cap on the number of off-licences in the Wainuiomata area which is six. Currently there are only five off-licence premises that are operational at this time. Police believe there is no need to replenish the maximum number of off-licence premises as alcohol-related harm in the community is already unacceptable and will likely increase with the granting of the new licence.

Days and hours proposed to sell alcohol:

The LAP has maximum trading hours for off-licence premises set at 7am to 10pm daily. The applicant is requesting hours of 9am to 10pm daily which falls within the LAP guidelines. The applicant has proposed hours of trading that are also within their proposed off-licence hours. What is concerning is the possibility that the applicant will utilise the maximum hours on the off-licence due to an existing off-licence premises only 88 metres away and is located on the same street.

The close proximity of another off-licence would most likely introduce competition between the two premises. An increase in promotional deals is inevitable enticing customers to check each store for the best price. Cheaper alcohol means higher sales in a vulnerable community that is already suffering from a higher cost of living.

The design and layout of proposed premises:

Fergusson Liquor Limited have recently rebranded their Upper Hutt premises under the banner of Super Liquor franchise. Their advertising branding is very bright and eye-catching. This in turn would be the same if the applicant was successful in obtaining an off-licence for the 15 Queen Street premises. Its store front is in a prime position opposite the Wainuiomata Community Centre and Queen Street reserve. Because the premises is on a corner section, the premises has a secondary store front which increases its alcohol advertising footprint to all users of this communal area.

Amenity and good order:

Police have recorded data in their system relating to alcohol harm. At this moment in time, there is alcohol-related harm in the vicinity of the proposed location of the new premises and the issuing of a further off-licence would unlikely reduce the harm.

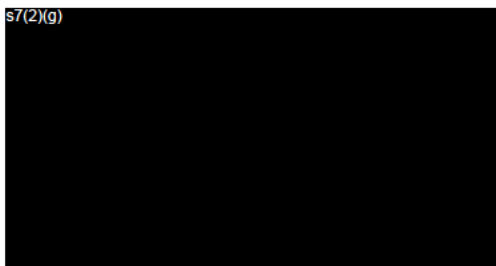
The object of the Act:

The object of the Act cannot be fulfilled if this additional new off-licence is granted as it is the belief of the Police, that harm caused by the excessive or inappropriate consumption of alcohol is not being minimised by such action.

For these reasons, Police oppose the application for New Off-Licence for Fergusson Liquor Limited trading as Super Liquor, Wainuiomata.

Yours sincerely

s7(2)(g)



Alcohol Harm Prevention Office
Wellington District Police

s7(2)(g)



Released under the Local Government Official Information and Meetings Act