

MT COOK! MOBILISED

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Local Approved Products Policy

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This submission has been prepared on behalf of Mt Cook Mobilised, a group which represents residents of Mt Cook, and is affiliated to the Newtown Residents Association.

The suburb of Mt Cook is a short walking distance from Cuba St and Downtown Wellington. Mt Cook is a residential suburb which is home to, or in the vicinity of, a broad range of educational institutions including pre-schools, primary secondary and tertiary. (Wellington High School, and the Adult Community Education Centre, Massey University, Mt Cook School, St Mark's School, Wellington College, Wellington East Girls' College, the NZ School of Dance and Toi Whakaari – The NZ Drama School. Pre-schools in and close to Mt Cook are Newtown Kindergarten, Te Kainganui, PolyHigh, Moriah Kindergarten, Kakapo Kids, Capital Kids Co-op, Mt Cook Pre-School and Early Years in Tory Street.)

The population of Mt Cook is very diverse. Residents include a high number of transient tertiary students, social housing tenants, new migrants, long-term residents, and the Taranaki Street Night Shelter. Wallace Street and Adelaide Road, Mt Cook, are major commuter routes, and are very popular walking routes to the city. Mt Cook is within Wellington's Liquor Ban area.

We have read the consultation document, the Local Approved Products Policy - Summary of Information. We appreciate the Wellington City Council's intention to establish a Local Approved Products Policy (LAPP). We understand that under the recent legislation governing the sale of "low risk" psychoactive substances the Council's powers are limited to defining "sensitive" sites, the distance between retail outlets selling psychoactive substances, and their proximity to "sensitive" areas. We understand that the substances will have been categorised as "low risk" by the Ministry of Health, and that the legal age for sale and consumption is 18 years. We also understand that if the restrictions included in the LAPP are too restrictive, the LAPP is likely to be challenged, as has happened in Hamilton, and could be overturned.

We wish to comment on 4 points regarding the Council's Local Approved Products Policy:

1. Sensitive areas to include tertiary education institutions

Under the WCC's proposed LAPP, sensitive areas are defined as high schools/colleges, and Wellington's YMCA. Mt Cook Mobilised would like to see tertiary institutions recognised in the list of sensitive areas. Students can leave secondary school at 16 years, often enrolling in a tertiary institution to gain further trades or sports training. Some students leave secondary school after Year 12 (at 16 – 17 years) to enrol in university. Tertiary training is an extension of

a student's education for many who are under 18, and tertiary institutions should be treated as sensitive areas.

2. Extend distance from primary schools, pre-schools and kindergartens

The second category of "sensitive area" defined by the proposed LAPP is primary schools, pre-schools and kindergartens. We disagree with the proposal to allow retail outlets for approved products within 50 metres of these sites. We suggest that this should be extended to 100 metres to make them less visible to young children. Council's proposed distance of 50 metres would be in the line-of-sight for many primary schools; some children would walk past the outlets every day on their way to school, and would become very brand-aware and accustomed to the idea of these products by the time they left primary school. In addition, children could become uncomfortable walking past these outlets if intoxicated patrons congregate around the outlets.

3. Include addiction support centres in the list of sensitive areas

Adults trying to combat substance or alcohol addiction are equally as vulnerable as young people. Addiction support programmes should not be compromised by having retail outlets for approved substances located nearby. The list of sensitive areas should be extended to include venues running programmes to help people overcome their addictions.

4. Distance Between Outlets

We support Option 2, premises selling approved products should be at least 400 metres from sensitive sites in Wellington (high schools/colleges and Wellington's YMCA), with the inclusion of tertiary institutions and venues running addiction support programmes as sensitive sites.

Option 2 says that premises selling approved products should be at least 50 metres from primary schools, pre-schools and kindergartens. We strongly recommend this distance be extended to 100 metres.

With regard to the distance between retail premises licensed to sell approved products, Option 2 suggests 180 metres (compared to Option 1 which suggests 200 metres); the difference of 20 metres is negligible in terms of more ready access for people wanting to buy approved substances, and is a reasonable trade-off for the extra distance from sensitive sites.

Conclusion

We thank the Wellington City Council for their undertaking to provide a LAPP (Local Approved Products Policy) for Wellington. We believe there are strong reasons for including tertiary institutions in the list of sensitive areas, and also venues running programmes to help people overcome their addictions. We prefer Option 2, with the modification that retail outlets for these substances must be at least 100 metres from primary schools, pre-schools and kindergartens.