



Brothels Bylaw Enforcement

Date Requested: 22 July 2025
Date Provided: 28 July 2025

Request

I have had several residents contact me to complain about brothels that appear to be operating in contravention of restrictions listed in Councils Bylaw. Each of these residents has explained to me that they experienced difficulty with enforcement.

I am trying to understand the enforcement practises surrounding the bylaw and am happy to discuss this over the phone, if preferred by Council; alternatively, please supply the following information:

1. Please provide the following statistics, in general terms. I don't need exact dates and times - just enough to get a rough gauge of if the Bylaw is actually working or not.

* How many complaints relating to breaches of the Brothels Bylaw have been received in the past five years, broken down by year? Of those complaints, how many resulted in investigations? Of those investigations, how many resulted in enforcement action being taken? e.g. warning, infringement notice, or prosecution.

* How many locations have been identified as non-compliant with the bylaw since it came into force?

2. What information is required from a Complainant in order for Council to be able to effectively enforce the bylaw?

1. Has Council sought or received any legal advice regarding the bylaw's enforceability, especially in relation to small owner-operator or "home-based" sex work?

Council Response

Please note that the only easily accessible data available is for the period 23 September 2021 to 21 July 2025, anything prior to this will require a manual search to collate.

1. How many complaints relating to breaches of the Brothels Bylaw have been received in the past five years, broken down by year?

For the period, as stated above, there have been 21 reports of brothel related concerns, consisting of:

- 23 Sep 2021 to 31 Dec 2021 – 1
- 1 Jan 2022 to 31 Dec 2022 – 5
- 1 Jan 2023 to 31 Dec 2023 – 5
- 1 Jan 2024 to 31 Dec 2024 – 6
- 1 Jan 2025 to 21 July 2025 - 4

1. Of those complaints, how many resulted in investigations?

All brothel related reports are investigated by an enforcement officer.

2. Of those investigations, how many resulted in enforcement action being taken? e.g. warning, infringement notice, or prosecution.

No received reports resulted in a substantiated breach.

2. How many locations have been identified as non-compliant with the bylaw since it came into force?

For the period, as stated above, there have been no substantiated breaches of the bylaw.

3. What information is required from a Complainant in order for Council to be able to effectively enforce the bylaw?

The information required would be around hours of operation, how many workers (if known), vehicle or traffic movements, and any other circumstantial information a concerned member of the public can provide.

4. Has Council sought or received any legal advice regarding the bylaw's enforceability, especially in relation to small owner-operator or "home-based" sex work?

No legal advice has been sought about enforcing under the bylaw. While a small owner-operated brothel (SOOB) is controlled through the bylaw, it is also controlled through home occupation rules under the Christchurch District Plan. Please note, that the deviation from home occupation rules in respect of a SOOB, is that a SOOB is permitted to have 4 workers instead of the 2 advised in the home occupation rules. If a substantiated breach were established for a SOOB, compliance would be sought under home occupation rules and this would be enforced under the Resource Management Act 1991, for contravening a district plan rule.