

STANDARD COUNCIL/COMMUNITY BOARD/COMMITTEE REPORT



Title of Report:	Report of the Hearings Panel on the Proposed Christchurch City Council Brothels (Location and Commercial Sexual Services Signage) Bylaw 2012		
Meeting of: (state which - Council/ Community Board/Committee)	Council		
Date of Meeting:	6 December 2012		
Date Required by Democracy Services:	N/A		
Typed by:	Siobhan Storey and Mel Renganathan		
Community Board Consultation:	Needed:	N	Complete:
Public Excluded	N if PUBLIC EXCLUDED the section below MUST be completed		
REASON UNDER ACT	SECTION	PLAIN ENGLISH REASON	WHEN REPORT CAN BE RELEASED

- No of Attachments (must be cited in report): 8**
1. Revised version of the Proposed Christchurch City Council Brothels (Location and Commercial Sexual Services Signage) Bylaw 2012 (after Hearing Panel) without tracked changes.
 2. Revised version of the Proposed Christchurch City Council Brothels (Location and Commercial Sexual Services Signage) Bylaw 2012 (after Hearing Panel) with tracked changes.
 3. Summary of Submissions received.
 4. Table of Issues discussed by Hearings Panel.
 5. Amended Christchurch maps including the Central City.
 6. Amended Central City map.
 7. Proposed Bylaw that was consulted on.
 8. Proposed Maps that were consulted on.

Confirmation of Statutory Compliance

In accordance with Section 76 of the Local Government Act 2002, this report is approved as:

- (a) Containing sufficient information about the options and their benefits and costs, bearing in mind the significance of the decisions; and,
- (b) Is based on adequate knowledge about, and adequate consideration of, the views and preferences of affected and interested parties bearing in mind the significance of the decision.

	Name and title of signatories	Signature	Date
Prepared by	Siobhan Storey Senior Policy Analyst and Mel Renganathan Policy Analyst		13 November 2012
Approved by Unit Manager	Alan Bywater, Programme Manager Strong Communities		22 November 2012

REPORT OF THE HEARINGS PANEL ON THE PROPOSED CHRISTCHURCH CITY COUNCIL BROTHELS (LOCATION AND COMMERCIAL SEXUAL SERVICES SIGNAGE) BYLAW 2012

General Manager responsible:	General Manager Strategy and Planning
Officer responsible:	Programme Manager Strong Communities
Author:	Proposed Christchurch City Council Brothels (Location and Commercial Sexual Services Signage) Bylaw 2012 Hearing Panel

PURPOSE OF REPORT

1. This is a report of the Proposed Christchurch City Council Brothels (Location and Commercial Sexual Services Signage) Bylaw 2012 Hearing Panel (the Hearing Panel). It summarises the consultation process and the submissions received on the proposed Christchurch City Council Brothels (Location and Commercial Sexual Services Signage) Bylaw 2012 (the Bylaw) and recommends the adoption of the Bylaw (with amendments), as set out in **Attachment 1**. The amended Bylaw with tracked changes is provided in **Attachment 2**.

EXECUTIVE SUMMARY

2. On 24 May 2012, the Council resolved to consult on a proposed Christchurch City Council Brothels (Location and Commercial Sexual Services Signage) Bylaw 2012. The purpose of the proposed Bylaw was to replace the Christchurch City Council Brothels (Location and Commercial Sexual Services Signage) Bylaw 2004, which expired on 6 July 2011, and to restrict the location of operator-run brothels to certain commercial areas around the city, provide for specified existing brothels to remain in their current location and control signage advertising commercial sexual services.
3. Submissions on the proposed Bylaw could be made between 11 June 2012 and 10 July 2012. A total of 197 written submissions were received, of which 18 were heard. Of the 197 written submissions received, three were received outside the consultation period and have not been included in the analysis. A summary of submissions is provided in **Attachment 3**.
4. The majority of submitters disagreed with the proposal in the Bylaw to restrict operator-run¹ brothels to particular areas, but agreed with the proposed controls on signage advertising commercial sexual services.
5. Many submitters requested changes to the areas where it is proposed operator-run brothels may locate. Many submitters also stated that brothels² should not be permitted in residential areas, close to residential areas or close to schools. Ten submitters suggested that operator-run brothels be allowed to locate only in the Central City area and not in any other area.
6. The Hearing Panel met to consider the proposed Bylaw on 11 September 2012, 21 September 2012, 19 October 2012, and 1 November 2012 and 14 November 2012. In addition the panel visited a number of the locations on site on 20 August 2012 to understand the proposed bylaw on the ground. The panel members were Councillors Helen Broughton (Chair), Ngaire Button, Jimmy Chen, Aaron Keown and Glenn Livingstone. Details of the Hearing Panel's deliberations are set out in **Attachment 4**.
7. With regards to regulating the location of brothels, the majority of the Hearing Panel concluded that brothels, other than SOOBs, should be allowed only in the Central City and prohibited elsewhere. Councillors Keown, Chen and Livingstone voted for this option; Councillors Button and Broughton voted against it. The proposed area in the Central City where brothels may be allowed is shown in **Attachment 5**.
8. To achieve this, further investigation is required to establish whether such a bylaw would be 'reasonable', a new proposal will need to be developed and a further special consultative procedure will need to be under taken.

¹ An operator-run brothel is one where the operator holds an operator certificate (under section 34(1) of the Prostitution Reform Act 2003) issued by the Registrar of the District Court in Auckland. A small owner operated brothel (SOOB) as defined in section 4(1) of the Prostitution Reform Act 2003, is "a brothel - (a) at which no more than 4 sex workers work; and (b) where each of those sex workers retains control over his or her individual earnings from prostitution carried out at the brothel".

² Most submitters did not differentiate between operator-run brothels and SOOBs, they just referred to "brothels".

9. The Hearing Panel agreed to recommend a draft Bylaw with provisions to control signage advertising commercial sexual services alone (**Attachment 1**) until the location provisions are determined.
10. The Hearing Panel decided that brothels (both operator-run brothels and SOOB's) should be prohibited from multi-unit residential complexes. This provision should become part of the further proposal for consultation.
11. The Hearing Panel is also in favour of adding one additional existing, long-standing brothel to the Schedule of brothels exempt from the location provisions when the new proposal is developed.

DEVELOPMENT OF PROPOSED BYLAW

12. The Christchurch City Brothels (Location and Signage) Bylaw 2004 (the 2004 Bylaw) expired on 6 July 2011. Since that time signage advertising commercial sexual services has only been subject to the same rules for signage as other activities regulated by the City Plan and Proposed Banks Peninsula District Plan (the District Plan) in the same way as other businesses. The location of brothels has not been subject to any bylaw controls since July 2005, when that part of the 2004 Bylaw was quashed by the High Court.
13. In 2009, during earlier stages of reviewing the 2004 Bylaw, the Council did not consider that there was a problem needing to be addressed with respect to the location of brothels. However, the effects of the February 2011 earthquake, including closure of the Central City, has caused concerns regarding the potential relocation of brothels (most of which were located in the Central City) to other areas.
14. The Council determined at its 22 September 2011 meeting that there was sufficient evidence of a perceived problem relating to the location of brothels and to signage advertising commercial sexual services, to warrant the development of a bylaw. Bylaw options were presented at several Council meetings in early 2012, and at the 24 May 2012 meeting, the Council decided to consult on a proposed Bylaw using the special consultative procedure.
15. The proposed Bylaw required all brothels, other than small owner-operator brothels (SOOBs), be located in specific commercial areas in Christchurch and be **prohibited** from all remaining areas. The permitted areas and the proposed Bylaw that were consulted on are found in **Attachments 7 and 8**. The proposed Bylaw also prohibited brothels other than SOOBs to be located in any building that is on a property that shares a boundary with a school, or is immediately adjacent to any important open space area marked on the Central City map. No regulation was proposed for the location of SOOBs. Known existing operator-run brothels were proposed to be exempt from the Bylaw location requirements through inclusion in a schedule.
16. The proposed Bylaw would regulate signs advertising commercial sexual services in the areas where operator-run brothels were permitted through controls on the number, placement and content of signs. Signage advertising commercial sexual services would be prohibited in the rest of the city.

CONSULTATION

17. Public consultation on the proposed Bylaw took place from 11 June 2012 to 10 July 2012 by use of the special consultative procedure. Consultation documents (including the proposed Bylaw) were sent directly to a range of groups, organisations and individuals. Public notices and campaign advertisements were placed in The Press, the Bay Harbour News, The Christchurch Mail and The Star. Four public drop-in sessions were held at venues in the Central City (19 June, two attendees), Woolston (20 June, nine attendees), the Hornby/Riccarton area (21 June, two attendees) and Lyttelton (26 June, 26 attendees). A public excluded drop-in session was also held for those working in the prostitution industry (nine attendees).

ANALYSIS OF SUBMISSIONS

18. A total of 197 written submissions were received, of which 18 were heard. Of the 197 written submissions received, three were received outside the consultation period and have not been

included in the analysis. The majority of submitters disagreed with the proposal in the Bylaw to restrict operator-run brothels to particular areas, but most submitters agreed that the location of brothels should be regulated. A full analysis of submissions is attached as **Attachment 3** and all written submissions are available in the Councillors' Lounge for Councillors to read.

19. Many submitters requested changes to the areas where it is proposed operator-run brothels may locate. In particular, the majority of submitters commenting on the Lyttelton zone considered that London Street should not be included and many of them considered that Norwich Quay should not be included either. In other words, these submitters considered there should not be any area in Lyttelton where large brothels may locate. A few submitters said they were unconcerned about having SOOBs in Lyttelton.
20. Many other submitters stated that brothels should not be permitted in particular areas largely because they are residential, close to residential, close to schools and/or close to churches and recreation areas. These areas are Lyttelton, Burnside (Sir William Pickering Drive and Roydvale Avenue), Wainoni/Aranui (the block bounded by Shortland Street, Wainoni Road, Bickerton Street and Pages Road), Riccarton, Tussock Lane (Ferryroad), Armagh Street between Montreal and Durham Streets, Buchanans Road (Yaldhurst), areas adjacent to Wigram Road (Wigram/Halswell), Victoria Street between Bealey Avenue and Salisbury Street, Main North Road and the Central City.
21. The majority of submitters agreed with the regulation of signage as set out in the proposed Bylaw.

HEARING PANEL DELIBERATIONS

22. The Hearing Panel met over several months from 11 September 2012 to 14 November 2012. and discussed a number of different matters. As the majority of submitters did not want to "see" brothel activities or expose children to them, the Hearing Panel discussed a number of options that would address these concerns and other issues raised by submitters. The main matters discussed were:
 - (i) Options around placing buffers between brothel-allowed areas and residential zones, schools, early childhood centres, and places of worship;
 - (ii) Particular suburbs where brothels were to be allowed in the consultation document, especially areas named by submitters;
 - (iii) Existing Brothels;
 - (iv) Prohibition of signage advertising commercial sexual services;
 - (v) Regulation of signage advertising commercial sexual services;
 - (vi) Allowing brothels, other than SOOBs in the Central City only
23. A brief summary of the Hearing Panel's discussions follows. A detailed description of the Hearing Panel's deliberations is provided in **Attachment 4**.

Location of Brothels

Buffers between residential areas and brothel-allowed areas

24. The Hearing Panel noted that most submitters did not want to "see" brothel-related activities from residential areas and these submitters requested that brothels not be located close to areas where people live. The Hearing Panel discussed several options for providing buffers between brothel-allowed areas and residential areas close by.
25. The Hearing Panel favoured the option of using properties that are in areas where brothels are allowed to locate, and adjoining³ a residential zone to form a buffer. This would provide a buffer of the depth of one property between residential areas and the areas where brothels can locate.
26. The Hearing Panel also discussed using roads as a buffer in situations where a residential zone is located on one side of the road and an area where brothels are allowed on the other. The Hearing Panel decided as a general rule that buffering is not required where the road

³ The City Plan defines "adjoining" as land shall be deemed to be adjoining other land, notwithstanding that it is separated from the other land only by a road, railway, drain, water race, river or stream. This term was not included in the consultation document.

concerned is a state highway or major arterial road because the road provides sufficient buffering. The Panel departed from this general rule in two locations where it decided further buffering was required in addition to the presence of a major road. For all other roads where the areas where brothels are allowed to locate adjoin a residential zone, the Hearing Panel decided a buffer of one property depth should be provided.

Buffers between schools and early childhood centres and brothel-allowed areas

27. The Hearing Panel considered buffering around schools and pre-schools/early childhood centres. The proposal provided for buffering around schools by not allowing brothels to locate on any property adjacent to a school. The Hearing Panel decided that additional buffers should be applied around schools by prohibiting brothels from locating in properties 'adjoining' schools. The panel also decided that the buffers for schools should also be applied to early learning centres. Buffers will be applied on the basis of the Ministry of Education's list of schools and early childhood centres and their locations on the date the bylaw comes in to effect.

Buffers between other areas and brothel-allowed areas

28. Some submitters suggested that brothels should not be located close to parks and open space, places where people socialise and places of worship. The Hearing Panel considered providing buffering around parks and open spaces in, or immediately adjoining, the areas where brothels are allowed to locate. The Hearing Panel noted it would be very problematic to provide buffers around all areas where people socialise and did not accept there was a good case for treating parks and open space differently to other areas where people socialise. The Hearing Panel noted that many parks and reserves are not in the areas where brothels will be allowed. Consequently the panel decided against buffers around parks and open spaces and other places where people socialise. The Hearing Panel discussed buffering around places of worship but concluded that since there is no clear definition about what constitutes a place of worship, and there is no register of these places, buffers should *not* be applied around places of worship.

Area-based discussions

29. Having applied the additional buffers around residential zones, schools and early learning centres, the Hearing Panel discussed each of the areas where it was proposed operator-run brothels be allowed to locate. The full discussion of these areas is provided in **Attachment 4**. The following is a summary.
30. The Hearing Panel agreed that some of the areas should be removed entirely, either in response to submissions or because the areas that remained after buffering were too small. Lyttelton was removed in response to the many submissions received on this area. Aranui and Wigram were removed because once residential buffering was applied the areas that remained were very small. **Attachment 5** includes maps of the agreed areas which also show the areas that were consulted on.
31. Central City Area
The proposed Central City area was amended by the application of the same buffering around residential areas, schools and early childhood centres as the rest of the proposed areas. The Hearing Panel also took into consideration comments from the Canterbury Earthquake Recovery Authority (CERA), which requested that brothels not be allowed within the areas allocated for the Frame and the anchor projects, and noted that the areas where brothels be allowed are not consistent in specific areas with the new Central City zoning regime in the Christchurch Central Recovery Plan. The Hearing Panel revised the areas where brothels will be allowed to locate as illustrated in **Attachment 6**.

Location of Small Owner Operated Brothels (SOOBs)

32. The Hearing Panel discussed placing restrictions on the location of SOOBs. The Hearing Panel noted that, in most cases, the general public are unaware of the location of SOOBs as these are small, usually extremely discreet businesses that are mostly located in residential areas. The regulations in the district plan apply to them in the same way as to any other home-based business. Determining the location of such premises would be difficult as SOOBs do not require operating licences, nor can entry be obtained without a Court warrant on very restricted grounds by the Police. The Hearing Panel also noted the results of the Willowford Family Trust v

Christchurch City Council 2005 case in which the Council's location bylaw provisions were ruled ultra vires largely on the grounds that they were not a reasonable restriction of SOOBs.

Existing brothels

33. One request to have an additional existing brothel exempt from the location provisions was received. "Tender Touch" is an existing brothel that has been operating from 183 Bealey Avenue for the last 17 years. The Hearing Panel discussed the information provided by the brothel manager and decided that this brothel should be added to the schedule of brothels exempted from the location provisions of the bylaw.

Prohibition and Regulation of Signage Advertising Commercial Sexual Services

34. The vast majority of submitters thought signage advertising commercial sexual services should only be in areas where brothels are located, and should be small and discreet. The Hearing Panel considered the submissions and agreed that the provisions in the proposed Bylaw are sufficient and should be retained. The Hearing Panel was advised by its legal adviser that it could recommend a bylaw be made covering only the signage provisions (while further consultation is carried out on the location provisions) and there is only a minor risk of a challenge to the proposed bylaw as a result of no location provisions being included.

Multi-unit complexes

35. One submitter requested that brothels be prohibited from multi-unit housing complexes. The submitter did not differentiate between operator-run brothels and SOOBs in their submission. The submitter stated that a bylaw prohibiting brothels from locating in such units will save the owners the legal costs from having to enforce lease and corporate body agreements themselves.
36. Staff provided advice to the Hearing Panel on this issue which is described in **Attachment 4**. In summary staff advice noted that under section 155 the council should not make a bylaw where there are other legal remedies available. In many multi-residence complexes there will be corporate body or lease agreements that limit the activities that can be undertaken in the complex. These agreements should be the mechanism by which issues arising from the operation of a brothel should be addressed. Staff also highlighted that a bylaw would only address the problem in respect of brothels being established in a unit, not other types of business activity which may also create impacts on other residents in a complex. The Hearing Panel briefly discussed this issue. The Panel concluded that a bylaw should prohibit brothels (including SOOBs) from operating in multi unit complexes.

HEARING PANEL'S CONCLUSIONS

(a) Location of brothels

37. Following the deliberations, the application of the buffers and other changes (as described above), the remaining areas where brothels would be allowed to locate are illustrated in the maps in Attachment 5

38. Councillor Keown proposed the following motion:

To restrict the allowable areas permitted for operator-brothels to the area within the four avenues (as illustrated in Attachment 6).

The motion was seconded by Councillor Chen.

39. Councillor Button moved by way of an amendment:

That the Council adopt either option one or two as below:

- *Option one: to restrict the allowable areas permitted for operator-brothels to the area within the four avenues (as illustrated in **Attachment 6**); or*
- *Option two: accept the proposed Brothels (Location and Commercial Sexual Services*

*Signage) Bylaw 2012 with the Central City and commercial areas as amended by the panel after public submissions (as illustrated in **Attachment 5**).*

The amendment was seconded by Councillor Broughton.

40. The Hearing Panel debated the amendment and the following reasons **against** restricting brothels to the Central City area were advanced:

- No Councillor voted against the original proposal (which included the central city and other commercial areas around the city) that went out for consultation.
- By amending or removing some areas, submissions have been responded to.
- Only ten submitters said they wanted brothels in the Central City alone.
- It is not clear whether the area where brothels could locate would be sufficient to avoid legal challenge and further work is required to investigate this.
- There would be no regulation of operator-run brothels during the time it would take for a new proposal to be developed and a Special Consultative Procedure carried out (about six to nine months).
- Further costs and staff resources would be required to develop a new proposal and carry out the Special Consultative Procedure.
- There is considerable uncertainty about the current and future state of the Central City.

41. In the debate the following reasons for restricting brothels to the Central City were advanced:

- There were no submissions against having brothels only in the Central City. There were no submissions advocating for brothels in any of the suburban areas in the proposal.
- The Central City business area has good transportation for both residents and visitors.
- In the past, most brothels have been located in the Central City.
- SOOBs will still be able to locate city-wide as there are no restrictions on their location.
- Most major cities, both in New Zealand and overseas, have red-light districts in the Central City.

42. When put to the meeting, the amendment was **lost** 2 votes to 3, the voting being as follows:

For (2): Councillors Button and Broughton
Against (3): Councillors Keown, Chen and Livingstone.

43. The Hearing Panel debated the substantive motion and the reasons for and against restricting brothels to the Central City were reiterated.

44. The substantive motion was then put to the meeting. The motion was **carried** 3 votes to 2, the voting being as follows:

For (3): Councillors Keown, Chen and Livingstone
Against (2): Councillors Broughton and Button.

(b) Consequential Procedural Determination

45. Councillor Broughton moved:

That the Hearing Panel recommend that the Council request staff to prepare a report on a proposed bylaw based on Central City brothel areas recommended by the Hearing Panel.

The motion was seconded by Councillor Keown and when put to the meeting was declared **carried** unanimously.

(c) Signage control

46. Councillor Broughton proposed the following motion:

That the Hearing Panel recommend that the Council approve a bylaw prohibiting and regulating signage as contained in the proposal but applied to the entire district until the location provisions are determined.

The motion was seconded by Councillor Button and when put to the meeting was declared **carried** unanimously.

(d) Multi-unit complexes

47. Councillor Keown proposed the following motion:

That brothels be prohibited from being located in a multi-unit residential complex.

The motion was seconded by Councillor Livingstone and when put to the meeting was declared **carried** unanimously.

LEGAL CONSIDERATIONS

48. A bylaw hearing panel has no decision-making powers, but can make recommendations to the Council, in accordance with its delegation for that purpose, as a result of considering written and oral submissions. The Council can then accept (either in full or in part) or reject those recommendations, as it sees fit, bearing in mind that the Local Government Act 2002 requires views presented during consultation to be given “due consideration in decision-making”.⁴

49. The Panel requested legal advice on various legal matters during the course of their deliberations. The questions asked and summarised answers are below:

Question: Can the Bylaw include a provision that requires SOOB owners to provide information to substantiate they are operating a SOOB, not an operator-run brothel?

Answer: Such a provision would carry the risk of being invalid on the basis it is repugnant to the laws of New Zealand in relation to the “usual” onus of proof provisions that apply to criminal offences. Such a provision is also likely to be inconsistent with the New Zealand Bill of Rights Act 1990, and may also be contrary to the Prostitution Reform Act 2003, which does not provide for brothel operator licences to be generally available as public information.

Question: Is there a process the Council could use to pass the rest of the Bylaw and deal with the Central City later when things are more settled and the planning work for the Central City is complete?

Answer: The only process the Council could use to deal with location issues in the Central City at a later date, but pass the rest of the Bylaw (covering location controls in other areas, and signage), is to review and amend the Bylaw in respect of the Central City later. There would have to be some form of regulatory control, or no controls at all, that apply in the interim to the “undecided” Central City area, if the rest of the Bylaw is made.

Question: Is a proposal for the operator-run brothel permitted zone to be Central City only, something that would require further consultation, and could this reduced area be too restrictive?

Answer: Further consultation would be required. Because a Central City only area was not one of the options considered by Council before adopting the proposed Bylaw, further work would need to be done by staff to analyse whether the proposed area provided sufficient areas for brothels to locate (as suggested in the *Willowford* case⁵) before a view could be reached as to whether or not the area is too restrictive for larger operator-run brothels. In addition a Central City only area is significantly different from the proposed bylaw consulted on.

Question: Would further consultation still be required if the brothel permitted zone was an enlarged Central City area (encompassing south of Moorhouse Ave and east of Fitzgerald)?

⁴ Section 82(1)(e). This is also supported by the Council’s Consultation Policy, which states: “we will receive presented views with an open mind and will give those views due consideration when making a decision”.

⁵ The decision of the High Court in *Willowford Family Trust v Christchurch City Council*, 29 July 2005 (which resulted in the location provisions of the Council’s first Brothels Bylaw being quashed) suggests that “empirical evidence concerning the availability of premises and the rentals demanded for them on the one hand, and as to the likely demand for premises from brothel owners on the other” should be considered by the Council to assess whether the area proposed for operator-run brothels to locate “is likely to be sufficient and able to meet the demand for premises from brothel operators” (see para 59 of the decision).

Answer: Yes, this is still a significant change from the original proposal, and there is legal risk for the council to make such a change without further consultation.

Question: Can the proposed Bylaw be made covering only the signage provisions while further consultation is carried out on the location provisions?

Answer: Yes. There is only a minor risk of a challenge to the proposed Bylaw as a result of no location provisions being included.

50. The Hearing Panel also received a memo summarising the three Brothels Bylaw court cases in New Zealand to date.
51. Legal issues were also discussed in relation to the submission on brothels in multi-unit complexes. If the Council were to accept the Hearing Panel's recommendations, staff suggested that as part of the staff report to Council, and further consultation to be carried out, the issue of SOOBs and operator-run brothels not being able to locate in multi-unit residential complexes is also addressed at that time.
52. The proposed Bylaw did not place any restrictions on the location of SOOBs. There may be members of the public who previously did not make a submission given there were no restrictions, but who would want to make a submission now if there is to be a restriction.
53. Section 157 of the Local Government Act 2002 requires that the Council give public notice of the making of a bylaw as soon as practicable after the bylaw is made. A recommendation has been made to this effect. It is recommended that the revised Bylaw as recommended by the Hearing Panel come into effect on 12 December 2012.
54. The Legal Services Unit considers that the form of the revised Bylaw, as recommended by the Hearing Panel in this report, is the most appropriate form, and that the Bylaw is not inconsistent with the New Zealand Bill of Rights Act 1990 (in accordance with section 155 of the Local Government Act 2002).

HEARING PANEL RECOMMENDATIONS

The Hearing Panel recommends that the Council:

- (a) Restrict the allowable areas permitted for brothels to areas within the four avenues as illustrated in **Attachment 6** and with exception of brothels listed in the proposed schedule.
- (b) Prohibit the location of brothels in multi-unit residential complexes;
- (c) Note that recommendations (a) and (b) will require a further special consultative procedure and that Council request staff to prepare a report on a proposed Bylaw based on Central City brothel areas recommended by the Hearing Panel as shown in **Attachment 6** to this report;
- (d) Approve a Bylaw prohibiting and regulating signage as contained in the proposed Bylaw but applied to the entire district until the location provisions are determined;
- (e) Adopt the Christchurch City Council Brothels (Commercial Sexual Services Signage) Bylaw 2012 as reflected in **Attachment 1** to this report; and
- (f) Give public notice as soon as practicable, that the Christchurch City Council Brothels (Commercial Sexual Services Signage) Bylaw 2012 has been adopted by Council, that it comes into effect on 12 December 2012 and that copies of the bylaw will be made available.