

Draft Local Alcohol Policy 2025

Summary of submissions on the draft Local Alcohol Policy for
Christchurch and Banks Peninsula

June 2025

Introduction

In June 2024, Christchurch City Council agreed to begin work on developing a Local Alcohol Policy (LAP) for Christchurch and Banks Peninsula.

As part of this process, councils are required to consider information about alcohol-related harm within their districts. To support this, we conducted extensive research and analysis using local, regional, and national data. This included statistics from New Zealand Police, Health New Zealand – Te Whatu Ora, and our Alcohol Licensing Team.

The [research report](#) identified that:

- Alcohol-related harm is occurring in some of our communities
- Alcohol-related harm may be associated with supervised and unsupervised drinking
- Communities want more say on alcohol licensing

Based on this research, we developed five potential policy options for inclusion in the LAP, along with one non-policy option. These were published in an [Issues and Options Report](#) in January 2025, which included the rationale behind each option.

Between mid-February and early March 2025, we sought feedback from the community, industry representatives, and statutory consultees. [Early engagement](#) showed strong community support for using LAP tools to help control alcohol availability.

This feedback, combined with our earlier research, informed the development of three proposed policies included in the draft LAP. In April, the Council adopted the [draft LAP](#) for public consultation.

This report outlines the community feedback received on the three proposed policies in the draft LAP.

About this report

This report outlines the results of consultation on the draft LAP for Christchurch and Banks Peninsula. The report sets out the responses to quantitative questions and provides a thematic analysis of the written feedback provided.

The purpose of the thematic (qualitative) component of this report is not to provide analysis on everything that respondents commented on, but rather to provide a summary of the key themes and issues raised by respondents.

The thematic analysis is based on the opinions of submitters, irrespective of whether they are factually correct.

Key Messages

Submitters shared a wide range of feedback on the three proposed policies in the draft LAP, reflecting diverse perspectives from communities and stakeholder groups. Overall, submitters provided good support for each of the policies.

Submitters who supported the proposed policies expressed a strong desire to reduce alcohol-related harm and backed the proposed measures aimed at achieving this. A recurring concern was the ease with which alcohol can currently be accessed—both in terms of the hours it is available and its widespread availability across the city. Many submitters highlighted the disproportionate impact of alcohol-related harm on vulnerable communities and supported initiatives to better protect these groups. There was a common view that there are already enough places to buy alcohol in the city, and that the current trading hours provide sufficient opportunity for people to plan their purchases before 9pm. Many of these submitters described the proposed policies as “common sense”, while others commended the Council for taking proactive steps to reduce alcohol related harm in the city.

Those submitters who opposed the proposed policies tended to express a level of scepticism about whether the policies would actually be effective in reducing alcohol related harm. They stated that the policies were inequitable, discriminatory, potentially ineffective, and could harm local economies. In some cases, submitters expressed concern that the proposed policies disproportionately affected the majority of individuals who consume alcohol in a responsible manner. Some submitters suggested more targeted or supportive approaches, such as restricting the number of licences based on an area’s population, stronger licensing conditions, or community-based harm reduction initiatives.

Across all of the policies there were submitters who supported the proposals in part, and recommended changes to the draft policy. Submitters who partially supported the proposed policies generally agreed with the goal of reducing alcohol-related harm but suggested various refinements:

- For Policy 1, they advocated for earlier closing times (often 10pm) and consistent rules across all off-licence types, including online sellers.
- For Policy 2, concerns were raised about fairness, effectiveness, and economic impact, with some preferring targeted strategies like population-based caps or improved enforcement.
- For Policy 3, while supporting protections near sensitive sites like schools and rehab centres, many wanted greater buffer distances and inclusion of more locations such as early childhood centres, with some favouring a case-by-case approach over blanket rules.

While submitters did propose a range of other suggestions, these should be considered in the context of the support provided by submitters for each of the policies as proposed. For every submitter who suggested a change to the policy, there were between 7 and 10 submitters who supported the policy as proposed.

In summary, the feedback received on the draft Local Alcohol Policy (LAP) reflects a wide range of views from across the community. While submitters did provide a mixture views on each of the proposed policies, overall, they are seen as a reasonable and proportionate response to addressing alcohol related harm in Christchurch and Banks Peninsula.

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The Approach

Consultation started on Thursday 17 April and ran until Sunday 18 May. Consultation details, including links to the project information, were shared on the [Kōrero mai | Let's Talk webpage](#) and advertised via:

- Direct emails sent to approx. 7,300 stakeholders, including statutory consultees (Police, Te Whatu Ora, District Licensing Committee, CCC Alcohol Licensing Team), Te Mātāpuna Hauora, local Rūnanga, licence holders, industry representatives, health advocacy bodies, schools and early learning centres, religious centres, transport providers, residents and business associations and previous submitters.
- Online and social media campaign on Facebook and Newsline.
- Advertising in Star communities' paper and council venues electronic promotional screens.
- Public notice in the Press Saturday 19 April 2025
- Consultation documents and flyers in all libraries and service centres, with stands in libraries in or adjacent to high deprivation areas.

Staff hosted an online webinar which was attended by seven people, with the recording viewed 36 times.

Staff also presented at one online Community Board member meeting and one community meeting hosted by the Greater Hornby Residents Association.

[The Kōrero mai | Let's Talk page](#) linked to the survey and had **2,790 views** throughout the consultation period. The page was able to be viewed in several languages and also contained links to the research report, issues and options paper, early engagement analysis and printable copies of the proposed policy, and submission form.

Survey

A total of 415 submissions were received. This included 49 submissions on behalf of organisations and 40 licence holders (both on and off licences). One late submission was received after the reporting deadline and therefore has not been included in the analysis presented in this report.

Mana Whenua feedback

Early in the project staff received direction from five Rūnanga to work with Te Mātāpuna Hauora to understand Rūnanga views in the development of a draft Local Alcohol Policy.

Te Mātāpuna Hauora is a committee of Rūnanga appointed representatives who provide advice on health and wellbeing related topics on behalf of five Rūnanga across Christchurch, Banks Peninsula and the Selwyn District. Represented within the group are Te Rūnanga o Ōnuku, Te Rūnanga o Wairewa, Te Rūnanga o Koukourarata, Te Hapū o Ngāti Wheke (Rāpaki) and Te Rūnanga o Taumutu.

Staff directly emailed Te Mātāpuna Hauora, Te Rūnanga o Ngāi Tuahuriri, Ngā Hau e Whā National Marae (Te Rūnanga o Ngā Maata Waka) and local Rūnanga offices informing them of the consultation however did not receive submissions on the draft policy from any of these representative groups.

Community Board feedback

The following Community Boards provided submissions on the draft policy.

- Waitai Coastal-Burwood-Linwood Community Board
- Waimāero Fendalton-Waimairi-Harewood Community Board
- Waipuna Halswell-Hornby-Riccarton Community Board
- Waipapa Papanui-Innes-Central Community Board
- Waihoru Spreydon-Cashmere-Heathcote Community Board

Statutory Consultee and licensed industry representative feedback

The representatives within this group who provided feedback during this engagement period were:

- Te Whatu Ora
- New Zealand Police
- Hospitality NZ
- Restaurant Association of New Zealand
- Foodstuffs South Island
- General Distributors Limited
- Superliquor Holdings Ltd

Summary of what we heard

What we asked the community		What the community told us			
Policy 1: Reduce trading hours for all off licences to 9pm daily	Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?	Total Submitters 414	Yes	57%	307 submitters gave general feedback on Policy 1. Supporters felt reducing off-licence alcohol sales hours to 9pm would help to curb late-night harm, while opponents viewed it as overreach and doubted its effectiveness. Others offered conditional support with suggestions for trial periods, addressing remote sales, or even stricter limits. 33 submitters gave specific feedback on the proposed trading hours, all suggesting changes. Most wanted later closing times, while a few requested later opening times. However, these views were in the minority, as 57% of all submitters supported the original draft policy settings, meaning for every one suggesting a change, seven supported the proposed hours.
			No	34%	
			I support part of this proposal	9%	
			I'm not sure	0.5%	
Policy 2: Place a freeze on new off licences in high deprivation areas	Do you support a freeze on granting an off-licence to new premises in areas that service high deprivation communities (decile 8, 9 and 10)?	Total Submitters 415	Yes	63%	281 submitters gave general feedback on Policy 2. Supporters felt it would help protect vulnerable communities by limiting alcohol availability, while opponents argued it was inequitable, potentially ineffective, and could harm local economies; others suggested more targeted or supportive approaches, such as restricting the number of outlets based on an area's population, stronger licensing conditions, or community-based harm reduction initiatives. 27 submitters gave specific feedback on the areas covered by Policy 2, with views ranging from expanding the policy citywide or to more deprivation deciles, to refining or reducing the coverage area. However, these suggestions were in the minority—broader feedback showed strong support for the proposed policy, with ten submitters backing the proposed coverage for every one who suggested changes. 27 submitters gave mixed feedback on the proposed exemptions to Policy 2, with most opposing them, particularly the exemption for applicants whose primary purpose is not alcohol sales. They argued it undermines the policy's intent and lacks consistency, though a few supported limited exemptions, especially for existing businesses or non-primary alcohol retailers.
			No	24%	
			I support part of this proposal	10%	
			I'm not sure	4%	
	Do you support restricting new bottle stores from opening within 200 metres of addiction treatment /rehabilitation centres, primary	Total Submitters 415	Yes	64%	258 submitters gave general feedback on Policy 3, providing strong support for restricting new bottle stores near schools and addiction centres to protect vulnerable communities and reduce alcohol-related harm, though some questioned the policy's effectiveness or opposed

Policy 3: Restrict new bottle stores near sensitive sites	schools and secondary schools in all Christchurch suburbs except Banks Peninsula and inside the central city (inside the four avenues)?		No	20%	including schools. A smaller group offered alternative suggestions, such as expanding the policy to other premises or applying a cap on the number of off licences in an area based on population density, but for every one of these, eight supported the policy as proposed.
			I support part of this proposal	13%	Submitters gave a range feedback on the definition of “sensitive sites” in Policy 3, with views split. Some supported including addiction and rehabilitation centres but opposed including schools, while others wanted the definition expanded to cover places such as early childhood centres, universities, churches, marae, and parks. While addiction centres received relatively broad support, many felt schools were less relevant due to existing age restrictions on alcohol sales.
			I'm not sure	3%	
	Do you support restricting new bottle stores from opening within 100 metres of addiction treatment/rehabilitation centres, and 50 metres of primary schools and secondary schools within the central city (inside the four avenues), and exempting the City Centre Zone?	Total Submitters 412	Yes	63%	Submitters offered mixed feedback on the proposed central city settings. Some supported the proposed approach acknowledging the area's unique role, while others opposed the exemption for the Central City Zone, arguing it weakens protections for vulnerable groups and creates inconsistency. Suggestions included expanding buffer zones and applying uniform rules citywide to avoid confusion and ensure fairness.
			No	21%	
			I support part of this proposal	12%	
			I'm not sure	5%	
	Do you support restricting new bottle stores from opening within 50 metres of addiction treatment/rehabilitation centres, and primary schools and secondary schools in Banks Peninsula?	Total Submitters 411	Yes	64%	Most submitters supported the proposed settings for Banks Peninsula, appreciating the tailored approach and viewing the 50-metre buffer as a practical compromise for small towns. Those opposed either felt the buffer was too short and called for consistency with citywide rules, or rejected the freeze entirely, questioning its effectiveness in reducing alcohol-related harm.
			No	21%	
			I support part of this proposal	10%	
			I'm not sure	5%	

Who did we hear from?

A total of 415 submissions were received on the draft Local Alcohol Policy.

Submissions	Number of Submitters*	% of Submitters
Individuals*	366	88%
Organisations*	49	12%
Licence Holders*	40	10%
Late Submission**	1	

* Note that these are not mutually exclusive.

** One late submission was received. It has not been included in the analysis or submission counts as it arrived after the reporting deadline.

Organisations	Number of Submitters*	% of Submitters
Hospitality Sector	5	1%
Off Licence Sector	16	4%
Community Groups	6	1%
Support Services	4	1%
Community Boards	5	1%
Wider Business Community	2	0.5%
Statutory Consultees	2	0.5%
Education Sector	4	1%

*Please note that this does not include all individuals involved in the hospitality or off-licence sector who responded. The number of licence holders is a more accurate representation.

Number of Respondents by Age

Age	Number of Respondents	% of Respondents
Not Stated	50	12%
Under 18 years	2	0.5%
18 – 24 years	19	5%
25 – 34 years	53	13%
35 – 49 years	108	26%
50 – 64 years	82	20%
65 – 79 years	83	20%
80 years and over	19	5%

Number of Respondents by Gender

Gender	Number of Respondents	% of Respondents
Not Stated	51	12%
Male	200	48%
Female	164	39%
Non-binary / another gender	1	0.2%

Number of Respondents by Ethnicity

Ethnicity	Number of Respondents	% of Respondents
NZ European*	290	70%
Māori*	21	5%
Pacific Peoples*	4	1%
Asian*	20	5%
Middle Eastern, Latin American & African*	3	0.7%
Other European*	30	7%
Other*	21	5%

* Note that these are not mutually exclusive. Respondents are able to select all that apply.

Territorial Authority Breakdown

Territorial Authority	Number of Respondents	% of Respondents
Christchurch City	331	80%
Waimakariri District	3	0.7%
Selwyn District	8	2%
Hurunui District	1	0.2%
Auckland	2	0.5%
Central Otago	1	0.2%

Community Board and Ward Breakdown

Community Board	Number of Respondents	% of Respondents
Te Pātaka o Rākaihautū Banks Peninsula	8	2%
Waitai Coastal-Burwood-Linwood	72	17%
Waipuna Halswell-Hornby-Riccarton	57	14%
Waimāero Fendalton-Waimairi-Harewood	41	10%
Waipapa Papanui-Innes-Central	63	15%
Waihoru Spreydon-Cashmere-Heathcote	85	20%

Ward	Number of Respondents	% of Respondents
Banks Peninsula	8	2%
Burwood	17	4%
Cashmere	27	7%
Central	32	8%
Coastal	27	7%
Fendalton	11	3%
Halswell	19	5%
Harewood	23	6%
Heathcote	32	8%
Hornby	13	3%
Innes	18	4%
Linwood	28	7%
Papanui	13	3%
Riccarton	25	6%
Spreydon	26	6%
Waimairi	7	2%

Why do we collect demographic information?

It is important that we understand both who we have and have not heard from when we consult on issues that affect everyone in the city. We include a standard set of demographic questions across our consultations and research that help us better understand this. These questions are optional; respondents do not have to answer them to provide their feedback.

Where possible, we align the questions we ask with the information that StatsNZ collects via the census. This ensures that we are capturing the information that is consistent with the national approach to reporting on demographics but also enables us to benchmark and understand whether we have heard from a representative group of respondents.

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

Submitters supported the proposed settings in Policy 1

- 57% of submitters supported reducing the maximum trading hours for all off-licence retailers until 9pm across Christchurch and Banks Peninsula.
- 34% of submitters opposed the proposal,
- 9% supported it in part.

Submitters who supported the proposal in part provided a range of feedback. Many of these submitters endorsed the intent to reduce alcohol-related harm but suggested changes to the proposed policy. For Policy 1, their feedback often focused on adjusting the proposed maximum trading hours (typically suggesting a 10pm closing time) or ensuring consistent rules across all off-licence types, including remote sellers, to prevent loopholes. In general, these submitters supported harm reduction while maintaining “reasonable access” for responsible consumers.

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?		
Total number of responses: 414		
Response	Count	%
Yes	236	57%
No	142	34%
I support part of this proposal	36	9%
I'm not sure	2	0.5%

Industry Feedback				
Off Licence Holders: 36 Other Submitters: 382				
Response	Off Licence Holders*		Other Submitters**	
	Count	%	Count	%
Yes	10	28%	228	60%
No	16	44%	126	33%
I support part of this proposal	10	28%	26	7%
I'm not sure	0	0%	2	1%

*Off licence holders includes submitters who stated they have an off licence or a club licence.

** Other submitters includes submitters who hold an on licence, submitters who do not have a liquor licence, and those who did not respond to the question.

General Feedback

307 submitters provided general feedback on Policy 1. Those who expressed overall support tended to express a view that alcohol is currently too easily accessible and believed that reducing off-licence sales hours to 9pm would help decrease alcohol-related harm and nuisance late at night. Some submitters expressed concern about the easy availability of alcohol at times when people are likely to have already been drinking. They welcomed the policy, noting that it would help prevent late-night 'top-ups'—purchases often made when judgement may already be impaired.

Many of those who opposed Policy 1 felt it was an overreach by the Council, arguing that adults should be free to decide when they purchase and consume alcohol. Several submitters questioned the policy's effectiveness in meaningfully reducing alcohol-related harm. Some were concerned about losing flexibility around alcohol purchasing hours, while others raised concerns about the potential economic and business impacts of the proposal.

Submitters who provided other suggestions generally supported aspects of Policy 1 but offered more nuanced or conditional feedback in their written responses. Most of these submitters asked for modifications to the policy, including doing more to address remote sales (ensuring that the playing field is level for all off licences), implementing the policy on a trial period with a commitment to an evidence-based review at the end of the trial, or addressing the hours that off licences can start selling alcohol in the morning. A few argued for making the policy even more restrictive, making suggestions such as banning the sale alcohol in supermarkets entirely, or changing the maximum trading hours to 6pm or 7pm.

Trading Hours

A total of 33 submitters provided specific feedback on the proposed maximum trading hours. In all cases, the feedback suggested changes to the draft policy. While most submitters recommended later closing times, a few proposed later opening times. These suggestions are summarised in the table below.

It is important to consider these requests within the broader context of the 57% of submitters who supported the policy settings proposed in the draft. For every submitter who suggested a different maximum trading time, there were seven who supported the proposed settings.

Response	Count	% total submitters
9:00 am*	5	1%
10:00 am*	1	0.2%
5:30 pm	1	0.2%
6:00 pm	1	0.2%
7:00 pm	1	0.2%
10:00 pm	17	4%
11:00 pm	6	1%
12am	1	0.2%

**Submitters requested later opening times*

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

Submitters provided strong support for Policy 2.

- 63% of submitters supported the proposed freeze on granting an off licence to new premises in areas that service high deprivation communities (decile 8, 9 and 10).
- 24% opposed the proposal
- 10% supported it in part.

Submitters who supported the proposal in part provided a range of feedback. While many generally supported the goal of reducing alcohol-related harm, they raised concerns about aspects of Policy 2. These included perceptions that it unfairly targets certain areas of the city, doubts about its effectiveness, and worries about potential business and economic impacts. Some also felt that the proposed exemptions could undermine the policy's intent. In some instances, submitters suggested alternatives such as population-based caps, improved enforcement, education, or other harm-reduction strategies instead of a blanket freeze.

Do you support a freeze on granting an off-licence to new premises in areas that service high deprivation communities (decile 8, 9 and 10)?		
Total number of responses: 415		
Response	Count	%
Yes	260	63%
No	100	24%
I support part of this proposal	40	10%
I'm not sure	15	4%

Industry Feedback				
Off Licence Holders: 36 Other Submitters: 383				
Response	Off Licence Holders*		Other Submitters**	
	Count	%	Count	%
Yes	14	39%	247	64%
No	14	39%	89	23%
I support part of this proposal	7	19%	33	9%
I'm not sure	1	3%	14	4%

**Off licence holders include submitters who stated they have an off licence or a club licence.*

*** Other submitters includes submitters who hold an on licence, submitters who do not have a liquor licence, and those who did not respond to the question.*

Analysis by ward shows that submitters from the Harewood ward were most likely to support the proposal than submitters from other wards, while submitters from the Innes, Coastal, and Fendalton wards were more likely to oppose it.

The wards most affected by this policy include Harewood, Hornby, Riccarton, Linwood, and Burwood. Policy 2 received strong support from submitters in these areas. The only wards not affected are Banks Peninsula and Cashmere, which highlights that pockets of high deprivation exist across the city. The feedback indicates broad support for reducing alcohol-related harm in areas of high deprivation, reflecting concern from submitters citywide.

Ward	Yes	No	I support part of this proposal	I'm not sure	Total Submitters
Banks Peninsula	63%	13%	0%	25%	8
Burwood	59%	29%	6%	6%	17
Cashmere	56%	22%	19%	4%	27
Central	50%	28%	22%	0%	32
Coastal	59%	37%	4%	0%	27
Fendalton	55%	36%	9%	0%	11
Halswell	68%	21%	11%	0%	19
Harewood	83%	4%	13%	0%	23
Heathcote	72%	25%	3%	0%	32
Hornby	69%	15%	15%	0%	13
Innes	61%	39%	0%	0%	18
Linwood	71%	18%	11%	0%	28
Papanui	69%	15%	8%	8%	13
Riccarton	64%	24%	8%	4%	25
Spreydon	62%	23%	12%	4%	26
Waimairi	71%	14%	0%	14%	7

General Feedback

A total of 281 submitters provided general feedback on Policy 2. Supporters of the proposed policy generally felt that there were already sufficient places to purchase alcohol in these areas, and that restricting new off-licences was the right step to protect vulnerable communities, who are often disproportionately affected by alcohol-related harm. There was a general feeling among these submitters that easy access to alcohol leads to more harm. Many expressed concern about the

current level of alcohol availability in these areas and acknowledged that this policy would help address the issue.

Those who opposed the proposed policy tended to either be concerned that it was inequitable, and unfairly targeted high deprivation communities, or simply thought that it would be ineffective in reducing alcohol related harm. Many of these submitters expressed a view that people are likely to travel to other areas of the city to purchase their alcohol, as opposed to changing their drinking habits. In a few instances submitters were concerned about the economic impacts that it would have on businesses and the “restriction of free trade”, while others were concerned that it would put supermarkets off investing in these areas and limit the communities access to other goods provided by supermarkets.

Submitters offered a range of additional suggestions. Some preferred a more nuanced approach to defining areas of high deprivation, while others proposed alternatives such as a restrictions based on the number of outlets per head of population, or a sinking lid policy. Several submitters called for stronger discretionary conditions to accompany the freeze, including bans on single sales, mandatory CCTV, and host responsibility training. Others encouraged the Council to take a more proactive role in reducing alcohol-related harm in these areas. Suggestions included providing education and support services to address the root causes of harm, as well as offering positive alternatives such as recreational facilities.

Areas Covered

27 submitters provided specific feedback on the areas covered by Policy 2. These submitters tended to fall into one of the following categories:

- Submitters who would like the restrictions extended to cover the whole city.
- Submitters who would like to see the freeze applied to a wider area than currently proposed, but not the whole city.
- Submitters who would like to see the policy extended to include deprivation deciles 7, 8, 9 and 10.
- Submitters who would like to see the policy cover a smaller/more refined area.

It's important to consider these requests for change within the context of the broader feedback, which showed strong support for the policy as proposed. For every submitter who sought changes to the areas covered, there were ten who supported applying the policy to deprivation deciles 8, 9, and 10.

Proposed Exemptions

Submitters (n= 27) provided mixed feedback on the proposed exemptions to Policy 2:

- An exemption is possible for licence applicants who can show their primary purpose is not the sale and supply of alcohol.
- Existing off-licence premises could renew their alcohol licence, and an existing off-licence premises could change ownership and continue operating.

Generally, most of these submitters opposed one or both of the proposed exemptions, but overall, the exemption for licence applicants who can show their primary purpose is not the sale and supply of alcohol drew the most opposition. These submitters tended to feel that the exemption undermined the intent of the policy, with several submitters highlighting evidence from 2014 that shows that supermarkets accounted for 31.2% of all alcohol sales by volume, second only to bottle stores. Some submitters called for equity and consistency across all off licence holders.

A small number of submitters explicitly highlighted their support for the proposed exemption for licence applicants who can show their primary purpose is not the sale and supply of alcohol. These submitters felt that it was appropriate to provide an exemption for these operators. A small number of submitters also highlighted their support for the exemption that allows an existing off-licence premises to change ownership and continue operating in the area.

Policy 3: Restrict new bottle stores near sensitive sites

Submitters provided strong support for all aspects of Policy 3:

- 63% of submitters supported the proposed settings for the central city.
- 64% supported the proposed settings for Banks Peninsula.
- 64% of submitters supported the proposed settings for the rest of the city.

Submitters who supported the proposals in part provided a range of feedback. As with policy 1 and 2, many submitters agreed in principle with the need to reduce alcohol related harm, particularly near schools and addiction treatment/rehabilitation centres, but in their view some aspects of Policy 3 required further refinement. A number of these submitters felt that the proposed distances were too short, suggesting that they should be increased to 300m, 500m, or even 1km. Others wanted to see additional sites included in the policy. Early childhood education centres were the most common suggestion among these submitters. In some instances, submitters wanted to see a more case-by-case approach, as opposed to blanket rules.

Do you support restricting new bottle stores from opening within 200 metres of addiction treatment /rehabilitation centres, primary schools and secondary schools in all Christchurch suburbs except Banks Peninsula and inside the central city (inside the four avenues)?		
Total number of responses: 415		
Response	Count	%
Yes	266	64%
No	85	20%
I support part of this proposal	53	13%
I'm not sure	11	3%

Industry Feedback (Proposed settings for all Christchurch suburbs except Banks Peninsula and inside the central city)				
Off Licence Holders: 36 Other Submitters: 383				
Response	Off Licence Holders*		Other Submitters**	
	Count	%	Count	%
Yes	13	36%	254	66%
No	13	36%	75	20%
I support part of this proposal	7	19%	46	12%
I'm not sure	3	8%	8	2%

*Off licence holders include submitters who stated they have an off licence or a club licence.

** Other submitters includes submitters who hold an on licence, submitters who do not have a liquor licence, and those who did not respond to the question.

Do you support restricting new bottle stores from opening within 100 metres of addiction treatment/rehabilitation centres, and 50 metres of primary schools and secondary schools within the central city (inside the four avenues), and exempting the City Centre Zone?		
Total number of responses: 412		
Response	Count	%
Yes	258	63%
No	85	21%
I support part of this proposal	49	12%
I'm not sure	20	5%

Industry Feedback (Proposed central city settings)				
Off Licence Holders: 36 Other Submitters: 380				
Response	Off Licence Holders*		Other Submitters**	
	Count	%	Count	%
Yes	21	58%	240	63%
No	9	25%	77	20%
I support part of this proposal	4	11%	45	12%
I'm not sure	2	6%	18	5%

*Off licence holders include submitters who stated they have an off licence or a club licence.

** Other submitters includes submitters who hold an on licence, submitters who do not have a liquor licence, and those who did not respond to the question.

Do you support restricting new bottle stores from opening within 50 metres of addiction treatment/rehabilitation centres, and primary schools and secondary schools in Banks Peninsula?		
Total number of responses: 411		
Response	Count	%
Yes	263	64%
No	86	21%
I support part of this proposal	41	10%
I'm not sure	21	5%

Industry Feedback (Proposed Banks Peninsula Settings)				
Off Licence Holders: 36 Other Submitters: 379				
Response	Off Licence Holders*		Other Submitters**	
	Count	%	Count	%
Yes	20	56%	246	65%
No	8	22%	79	21%
I support part of this proposal	3	8%	38	10%
I'm not sure	5	14%	16	4%

*Off licence holders include submitters who stated they have an off licence or a club licence.

** Other submitters includes submitters who hold an on licence, submitters who do not have a liquor licence, and those who did not respond to the question.

General Feedback

A total of 258 submitters provided general feedback on Policy 3. Submitters who supported the policy emphasised the importance of protecting the most vulnerable members of our communities. In the case of schools, many felt it was reasonable to reduce young people's exposure to alcohol and alcohol-related harm, supporting the proposed 200-metre restriction around primary and secondary schools. Regarding addiction and rehabilitation centres, submitters backed the idea of providing additional protections for people in recovery. Generally, these submitters supported policies that would reduce alcohol related harm, and there was a strong sentiment that limiting new bottle stores near sensitive sites would contribute to safer, healthier environments and support long-term public wellbeing. In a number of instances these submitters described this policy as common sense and praised the Council for taking steps towards protecting vulnerable members of the community.

Those opposed to the policy once again questioned its effectiveness in reducing alcohol-related harm, arguing that there is limited evidence to support its introduction. In some cases, submitters supported restrictions around addiction treatment centres, acknowledging that such measures are likely to have a positive impact, but opposed the inclusion of schools in the policy. In the specific context of schools, some submitters noted that students at primary and secondary levels are generally unable to purchase alcohol regardless. They argued that, provided existing rules and restrictions are properly enforced, the risk posed by alcohol outlets being located near schools is negligible.

Submitters who provided other suggestions generally offered nuanced or alternative perspectives that did not clearly indicate full support or opposition. In some instances, submitters supported the proposed policy in principle but wanted to see a broader or different application of the policy. The two most common examples are applying the policy to a wider range of premises (most commonly nightclubs, bars and other on licences) or removing some of the concessions that had been made for certain areas (e.g. Banks Peninsula, the central city zone). In other instances,

submitters suggested that a cap on the number of off licences in an area based on population density would be a better approach. As with those who opposed, in some instances these submitters were concerned about whether the policy would actually reduce alcohol related harm.

In a few instances (7 submitters) submitters requested that the policy should be expanded to apply to taverns, pubs, bars, and nightclubs.

As with the other policies, it is important to consider the alternative suggestions put forward within the context of the broader feedback received. In the case of Policy 3, for every submitter who put forward an alternative proposal, there were 8 submitters who supported the policy as proposed.

Sensitive Sites

53 submitters provided specific feedback on what has been classified as sensitive sites. In some instances submitters wanted additional sites added to the policy, while others were happy with including addiction and rehabilitation centres but opposed the inclusion of primary and secondary schools. Many submitters supported the intent of the policy but wanted the definition of 'sensitive sites' broadened to include sites such as early childhood education centres, the University of Canterbury, other youth organisations and social services, churches, marae, and places of worship, or parks with children's play areas. The inclusion of many of these sites was explored during early engagement, but they did not receive sufficient community support to be included in the draft policy.

Schools

Much of the feedback received on schools was opposition to their inclusion in the policy. These submitters expressed a view that off licences are 'R18' venues that children cannot visit, making their proximity to schools irrelevant. Other submitters reiterated their support for including early childhood education centres in the policy.

Addiction and Rehabilitation Centres

Submitters generally reiterated their support for including addiction and rehabilitation centres in Policy 3. Many of these submitters highlighted that they support the inclusion of addiction and rehabilitation centres but would like to see schools removed from the policy.

Central City Settings

A range of feedback was provided on the proposal for the central city. Those expressing their support for the proposal supported taking a balanced approach that recognises that the central city environment is different to other areas of the city but still goes some way to providing protection for children and people in recovery, even in the central city. A few submitters highlighted their support for the exemption for the Central City Zone (CCZ), acknowledging its role as a hub for nightlife and tourism.

Those submitters that objected to the exemption of the City Centre Zone, felt that it undermines the policy's intent and leaves vulnerable people unprotected. In some instances, submitters expressed disappointed that children attending schools in the central city would not be afforded

the same protections as those at schools in other parts of the city. Others who opposed the proposed settings for the central city felt that 50m or 100m was not enough of a buffer and suggested increasing it to 200m, 500m, or even 1km. Some felt the policy was overly restrictive, unnecessary, or unfairly targeted alcohol vendors.

In some instances, submitters questioned the logic of different rules for different areas of the city (e.g. central city vs. suburbs), suggesting that it may lead to confusion.

Banks Peninsula Settings

Generally, most submitters supported the proposed settings for Banks Peninsula. Submitters who supported the proposed settings tended to acknowledge that there was still a need to protect vulnerable members of the community in Banks Peninsula, but that there was a need for a tailored policy that considers the unique needs of different areas rather than applying a one-size-fits-all rule. A 50-metre buffer was seen as a reasonable balance given the compact layout of small towns.

Those who didn't support the proposed settings for Banks Peninsula tended to fall into one of two groups:

- Submitters who feel that 50m was too short of a distance to have any meaningful impact and would like to see similar settings more aligned with those proposed for other areas of the city. Many of these submitters questioned why areas like Banks Peninsula or the central city were treated differently, calling for consistent rules across all areas of the city.
- Submitters do not support implementing a freeze around sensitive sites at all. These submitters often view Policy 3 as “regulation for the sake of it” and question its effectiveness. They argue that the policy is unlikely to change behaviour, as people will still find ways to access alcohol irrespective of proximity to sensitive sites.

Feedback from Statutory Consultees

Feedback was received from two statutory consultees; Te Whatu Ora: Health New Zealand (National Public Health Service (NPHS) Te Waipounamu region) and New Zealand Police. No feedback was received from the Christchurch City Council Licencing team.

A summary of the feedback from statutory consultees is provided below, their full submissions provide a range of evidence in support of their views and recommendations.

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

New Zealand Police

New Zealand Police provided their support for the proposal to reduce trading hours for all off-licence premises to 9pm daily, highlighting that this is a matter of focus for Police. They supported the proposal for the policy to apply uniformly across all types of off-licences.

They also recommended that the Council consider including a provision in the LAP that prohibits the same day delivery of alcohol after 7pm – other than premises whose licence is endorsed as a remote seller (*pursuant to Section 40 of Sale & Supply of Alcohol Act 2012.*)

Te Whatu Ora: Health New Zealand (National Public Health Service (NPHS) Te Waipounamu)

NPHS Te Waipounamu expressed strong support for the proposal to reduce trading hours for all off-licence premises to 9pm daily. They endorsed the policy applying uniformly across all types of off-licences, noting that limiting trading hours for only some types could lead to unintended consequences, such as people travelling further to purchase alcohol or certain outlets gaining a competitive advantage.

In addition to supporting the proposed policy, NPHS Te Waipounamu recommended that the Council consider delaying the opening time for all off-licence outlets to 9am.

They also suggested that the Council consider reducing trading hours for on-licence venues in suburban areas to 1:00am. They provided evidence that suggests earlier closing times for pubs and bars are associated with reductions in physical harm, including assaults, injuries, and vehicle crashes.

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

New Zealand Police

New Zealand Police supported the proposal to introduce a freeze on new licensed venues and outlets in areas of high deprivation but recommended that it is extended to include deprived areas with a decile ranking of 7 to 10. They noted that decile 7 areas within Christchurch currently have a similar (high) number of off licences premises to ones of decile 8 and above.

Te Whatu Ora: Health New Zealand

NPHS Te Waipounamu supported the introduction of a freeze on new licensed venues and outlets in areas of high deprivation. They also offered several suggestions to strengthen the proposed policy.

They recommended that the policy be extended to include areas of medium-high deprivation (deciles 7 and 8), in addition to areas of high deprivation (deciles 9 and 10). They also suggested extending the duration of the freeze to up to six years, to allow sufficient time to assess whether the policy is achieving its intended outcomes.

In addition to broadening the scope based on deprivation levels, NPHS Te Waipounamu recommended that the Council consider incorporating other indicators, such as crime, health, licensing, and demographic data, when determining which areas should be subject to the freeze. They believe that using these additional data sources will help identify areas where alcohol-related harm is having a cumulative impact.

Policy 3: Restrict new bottle stores near sensitive sites

New Zealand Police

New Zealand Police supported the proposal to restrict new bottle stores near sensitive sites but opposed the exemption for the City Centre Zone.

While they recognised the efforts to ensure that the Christchurch has a vibrant entertainment sector, it is their view that this must be balanced against any excessive availability of alcohol which increases the risk of alcohol related harm. They highlighted that the central city is covered by a 24-hour alcohol ban and provided data that reflects a very high level of related incidents occurring within the four avenues. The Police view is that that off licence premises within the central city can empower individuals to consume alcohol irresponsibly, which in turn gives rise to harmful behaviour. It is their view that off licences within the central city (including the Central City Zone) should be significantly restricted, with no new licences issued and tighter restrictions on operating hours.

Te Whatu Ora: Health New Zealand

NPHS Te Waipounamu supports restricting new license venues and outlets from being located within 100m of sensitive sites but would like the Council to consider also applying the restriction to early childhood centres and marae and places of worship. Additionally, they recommended that kura kaupapa and kōhanga reo are included in the definitions of early childhood centres and primary and secondary schools.

They also recommended that the policy applies to some additional sites, including community facilities, playgrounds, parks and reserves, making the point that including parks as sensitive sites may also support alcohol control bylaws that have been applied to these facilities.

They recognised that community feedback had been used to inform which communities are included as sensitive sites but encouraged the Council to engage with local marae to understand perspectives on alcohol availability, alcohol-harm and the sensitive site policy.

Note: Early in the project staff received direction from five Rūnanga to work with Te Mātāpuna Hauora to understand Rūnanga views in the development of a draft Local Alcohol Policy. Staff directly emailed Te Mātāpuna Hauora, Te Rūnanga o Ngāi Tuahuriri, Ngā Hau e Whā National Marae (Te Rūnanga o Ngā Maata Waka) and local Rūnanga offices informing them of the consultation but did not receive submissions on the draft policy from any of these representative groups.

Additional Feedback

Te Whatu Ora: Health New Zealand

NPHS Te Waipounamu indicated that they would support the introduction of a one-way door restriction, arguing that they can help prevent a large number of people coming out of licensed premises at the same time and the potential for intoxicated patrons migrating between venues or interacting with others with an increased likelihood of disorder and crime. They noted that there is limited evidence to support a one-way door policy and acknowledged the importance of one-way door restrictions being part of a comprehensive programme to reduce alcohol-related harm.

They also made a number of other recommendations:

- Including a policy preventing new licensed premises from being located in close proximity to other licensed premises.
- Including a policy to restrict alcohol advertising and signage at licensed premises.
- Adopting a policy in the LAP that prohibits the use of 'buy now, pay later' (BNPL) services at licensed premises.
- Including drink serve limit of a maximum of two drinks per serve per person for special licensed events.

Industry Feedback

36 submitters indicated that they hold an off licence (35 off licence holders and 1 club licence holder). The following section of this report sets out the feedback received from the off licence holders on the three policies in the draft LAP.

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

Submitters from the off licence sector did not provide a unified view on the proposed settings in Policy 1.

In several cases, on-licence holders expressed support for the proposed settings in Policy 1. They noted that the proposed trading hours reflect actual sales patterns, with most alcohol sales occurring before 8pm. These submitters also agreed with the broader view that the changes could help reduce alcohol-related harm during late-night hours. Some felt it would provide a safer operating environment for their staff.

However, some off-licence holders expressed concerns that the proposed settings could inconvenience customers and negatively impact their businesses and the local economy. Echoing the broader sentiment of submitters who opposed the settings in Policy 1, these respondents questioned whether reducing trading hours to 9pm would meaningfully reduce alcohol-related harm. They also raised concerns about potential unintended consequences, such as customers stockpiling alcohol earlier in the day.

Some off-licence holders expressed support for the proposed settings, but with certain conditions. These conditions largely focused on ensuring the policy applies equally to all off-licences. Many submitters raised concerns about potential loopholes if remote sellers were to be exempt, stressing the importance of a level playing field to prevent unfair competition.

Those concerned about remote sellers argued that granting them an exemption would undermine the intent of the policy. They also highlighted that remote sellers are not subject to the same compliance oversight as bricks-and-mortar stores. If remote sellers were exempt, submitters warned it could lead to a surge in applications for remote licences.

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

Submitters who hold an off licence were also divided on the proposed settings in policy 2.

Submitters were divided in their views, with some supporting the proposed settings and others opposing what they saw as a blanket approach. Those in support generally recognised the need to address alcohol-related harm in these communities. They acknowledged that the proposed policy aligns with the harm minimisation goals of the act, and in some cases accepted that achieving these goals may require a “people before profit” approach. Some of these submitters were pleased that the policy would not affect existing operators. In certain instances, their support was conditional—they wanted to see provisions included that would allow existing operators to relocate within the area.

Submitters who opposed the proposed settings tended to argue against a blanket freeze, often suggesting that new applications should be assessed on merit, and on a case-by-case basis. They

argued that it doesn't account for future growth, zoning changes, or emergencies (e.g., earthquakes), and could protect poor operators while excluding better new entrants.

Feedback was also mixed on the proposed exemption for supermarkets. While some supported it, highlighting the importance of full-service grocery shopping, others opposed it on the grounds that they feel it creates an unfair competitive advantage for supermarkets and undermines the intent of the policy.

Submitters again raised concerns about remote sellers. They are concerned that remote sellers will exploit regulatory gaps to deliver into restricted freeze zones, which will in turn put the policy's effectiveness in jeopardy.

Policy 3: Restrict new bottle stores near sensitive sites

As with the other policies, submitters who hold on- and off-licence were also divided on the proposed settings in Policy 3.

The sentiment from those who supported the proposed settings was similar to Policy 2. They generally recognised the need to protect vulnerable members of the community from alcohol related harm and acknowledged that the proposed policy aligns with the harm minimisation goals of the act and again accepted that achieving these goals may require a "people before profit" approach.

Those who did not support the proposed settings were concerned that the proposed restrictions may not lead to a meaningful reduction in alcohol related harm. Some were concerned that it may penalise existing businesses if sensitive sites open nearby. Others thought that it would be unfair to off-licences if on-licences (e.g. bars, cafés) are exempt.

Some submitters expressed concerns about the proposed distances or how they would be calculated. The central city exemptions are mostly supported, but some want the exemption area narrowed or better defined.