

# Local Alcohol Policy Issues and options report

January 2025

# 1. Introduction

- 1.1. Christchurch City Council is considering the need for a local alcohol policy for Christchurch.
- 1.2. Using information and insights gathered through research and engagement, this document provides an overview of alcohol-related issues in our district and possible options for dealing with them.
- 1.3. The document has been prepared to seek community views on the options. It does not represent the Council's proposals or policy position.
- 1.4. Your feedback will help the Council decide if any of these options should be included in a draft local alcohol policy. Further consultation will be undertaken if a draft local alcohol policy is prepared.

# 2. Context

- 2.1. The Sale and Supply of Alcohol Act 2012 provides a system of control for the sale and supply of alcohol in New Zealand. It aims to ensure the sale, supply and consumption of alcohol is carried out safely and responsibly and that alcohol-related harm is minimised.
- 2.2. The Sale and Supply of Alcohol Act allows councils to develop local alcohol policies setting down rules and conditions about how alcohol is sold and supplied in their districts. If a council has a local alcohol policy, licensing bodies must consider it when making decisions about alcohol licensing applications.
- 2.3. Councils are not required to have a local alcohol policy but any council wishing to have one must follow a process set out in the Sale and Supply of Alcohol Act, which includes considering local data and producing a draft policy on which it must consult the community.
- 2.4. Our Council has decided to start work to develop a draft local alcohol policy for Christchurch. We have gathered information and insights from the police, health authorities, and alcohol licensing inspectors, from people and organisations involved with or affected by alcohol use and misuse, and from the broader community through a Life in Christchurch survey.
- 2.5. We have prepared two documents to inform decision-making:
  - a research report, which sets out all the information gathered by the organisation to inform a local alcohol policy
  - an issues and options paper (this document), which provides a summary of the key alcohol-related issues in the district and possible options for addressing them.

## 3. Scope

- 3.1. In preparing this issues and options paper, we have been informed by:
  - the research report
  - early engagement with stakeholders
  - analysis of our research and engagement to date.
- 3.2. The research report draws on local, regional and national data. It includes information that councils must consider when producing a draft local alcohol policy:
  - the objectives and policies of its district plan
  - the number of licences of each kind held for premises in its district, and the location and opening hours of each of the premises
  - any areas in which bylaws prohibiting alcohol in public places are in force
  - the demography of the district's residents
  - the demography of people who visit the district as tourists or holidaymakers
  - the overall health indicators of the district's residents
  - the nature and severity of the alcohol-related problems arising in the district.
- 3.3. The research report also includes information on:
  - the content of local alcohol policies developed by other territorial authorities
  - findings of research of the effectiveness of local alcohol policy provisions in New Zealand, and similar policies in other countries
  - a review of economic literature relevant to a local alcohol policy.
- 3.4. The scope of options considered in this document is based primarily on what the Sale and Supply of Alcohol Act allows to be included in any local alcohol policy, that is, policies on:
  - where licensed premises can be located – including any limits in particular areas or near certain types of facilities
  - whether any new licences or types of licence can be issued in the district (or any part of the district)
  - restricting or extending the maximum trading hours set out in the Act
  - any conditions to which licences, or types of licence, should be subject (for example, 'one-way door' conditions).
- 3.5. Local alcohol policies cannot include policies on matters unrelated to licensing.
- 3.6. However, the document does consider some measures that fall outside the scope of a local alcohol policy to enable the Council to consider whether any of the issues identified require action to be taken instead of, or in addition to, a local alcohol policy for Christchurch.

## 4. Identifying the issues

### Alcohol-related harm is affecting our communities

4.1. Research tells us that our communities are experiencing a range of alcohol-related harms:

- **Alcohol is a contributing factor to many incidents the Police respond to.** Over the four years from 2020 to 2023, the Police recorded 36,705 incidents in Christchurch where alcohol was identified as a contributing factor – around 9,000 each year.<sup>1</sup> They cover a wide range of incidents and offences. In 2023, most coded incidents were for violence (1,445), and there were 3,087 incidents relating to family harm.
- **Many residents have drinking habits that place them or others at risk of harm.** The Canterbury Wellbeing Survey found that 6.8% of females and 7.9% of males drink more alcoholic drinks in an average week than recommended by New Zealand guidelines.<sup>2</sup> New Zealand Health Survey data suggests that about 1 in 5 Canterbury residents are hazardous drinkers<sup>3</sup>, and/or heavy episodic drinkers.<sup>4</sup>
- **Alcohol is affecting people's health.** Nationally, alcohol consumption was attributable to 2.7% of all deaths, 2.8% of all hospitalisations and 4.8% of cancer registrations in 2018.<sup>5</sup> Christchurch has a significantly higher hospitalisation rate for conditions wholly attributable to alcohol than other major cities.<sup>6</sup>
- **Drink driving has increased over the past four years.** Over the four years from 2020 to 2023, there were 5,744 drink driving offences in Christchurch, increasing from 1,279 in 2020 to 1,660 in 2023.<sup>7</sup> Alcohol was a factor in 673 motor vehicle crashes resulting in injury or death in the ten years from 2014 to 2023.<sup>8</sup>
- **Many residents report alcohol-related harm or alcohol-related issues in their area.** Nationally, almost half (46%) of those surveyed reported experiencing harm from either their own or someone else's drinking in the past year.<sup>9</sup> Christchurch survey data indicates that almost a quarter of residents (23%) consider alcohol and drug-related issues are 'a big problem' in the city, and nearly half (48%) think they

<sup>1</sup> This is likely to be an underestimate because information on whether alcohol is factor is not always known or recorded. Police National Intelligence Application (NIA) data, supplied by New Zealand Police.

<sup>2</sup> No more than 10 standard drinks a week for women, and no more than 15 for men.

<sup>3</sup> 21.4% of Canterbury respondents in the period from 2017 to 2020. Refers to 'an established drinking pattern that carries a risk of harming physical or mental health or having harmful social effects to the drinker or others'. Defined as a score of 8 or more on the 10-question Alcohol Use Disorders Test.

<sup>4</sup> 22.4% of Canterbury respondents in the period from 2017 to 2020. Defined as drinking six or more alcoholic drinks on one occasion at least monthly.

<sup>5</sup> Chambers T., Mizdrak A., Jones A.C., Davies, A. Sherk, A. (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Wellington, New Zealand.

<sup>6</sup> Environmental Health Intelligence New Zealand (EHINZ) data, provided by National Health Service Waitaha Canterbury.

<sup>7</sup> Police National Intelligence Application (NIA) data, supplied by New Zealand Police.

<sup>8</sup> Waka Kotahi – NZTA Crash Analysis System data.

<sup>9</sup> Nielsen. (2021). [Alcohol Use in New Zealand Survey \(AUINZ\) 2019/20: High-level results](#). Wellington, New Zealand: Te Hiringa Hauora/Health Promotion Agency.

are ‘a bit of a problem’.<sup>10</sup> At the neighbourhood level, most issues relate to litter (39% of Life in Christchurch respondents), followed by loud noise (29%) and offensive and nuisance behaviour (28%).

- 4.2. **Some people are more affected by alcohol-related harm than others.** Māori, young people and males are more likely to have hazardous drinking patterns, and are overrepresented in health data on deaths or conditions that are attributable to alcohol.<sup>11</sup>
- 4.3. We also know that **some communities are more affected than others.**
- Around a third of all alcohol-related incidents attended by the Police are in the east of the city. Another third of incidents are split across the central city and the central north west (which includes the Riccarton, Merivale and Papanui/Northland commercial centres). Relatively few incidents occur in Banks Peninsula.<sup>12</sup>
  - In the Life in Christchurch survey, residents in the Burwood, Central, Coastal, Linwood and Riccarton wards were more likely to say that some or most of various alcohol-related issues occur frequently in their neighbourhoods.
- 4.4. Those living in **communities with higher levels of deprivation are disproportionately affected** by alcohol-related harm.
- Nationally, survey data suggests those experiencing alcohol-related harm are more likely to live in the most deprived areas than in less deprived areas.<sup>13</sup>
  - In Christchurch, the Police attend more alcohol-related incidents in areas of high deprivation than in less deprived areas. In the east of the city, half (51%) of all alcohol-related incidents attended by the Police and 40% of incidents in public places occur in areas with the highest levels of deprivation.<sup>14</sup>
  - People in the most deprived areas of the city are more likely to perceive alcohol and drug problems as ‘a big problem’ than those in the least deprived areas.<sup>15</sup> Life in Christchurch survey findings suggest that those living in wards with higher levels of deprivation are more likely to experience alcohol-related issues in their area and have concerns with various aspects of current alcohol licensing rules.<sup>16</sup>
- 4.5. Licensing data indicates there are more on-licensed and off-licensed premises in areas of high deprivation, and they generally have earlier opening and later closing times. In our early engagement, we’ve heard concerns about a concentration of premises in more deprived areas and the effect that can have on reducing the price of alcohol, and

<sup>10</sup> Quality of Life Survey 2022; residents were asked about the past 12 months.

<sup>11</sup> See ‘health indicators’ section of the accompanying research report for relevant data.

<sup>12</sup> Police National Intelligence Application (NIA) data, supplied by New Zealand Police.

<sup>13</sup> Nielsen. (2021). [Alcohol Use in New Zealand Survey \(AUiNZ\) 2019/20: High-level results](#). Wellington, New Zealand: Te Hīringa Hauora/Health Promotion Agency.

<sup>14</sup> Police National Intelligence Application (NIA) data, supplied by New Zealand Police. Deprivation data is based on NZ Deprivation Index (2018) ratings, with the most deprived areas being defined as those that are deciles 9 and 10.

<sup>15</sup> Quality of Life Survey 2022, 27% for the most derived areas (Quintile 5) compared to 20% in the least deprived areas (Quintile 1).

<sup>16</sup> See ‘community insight’ section of the accompanying research report.

increasing consumption, in these areas. This effect is also discussed in available economic literature.<sup>17</sup>

## Alcohol-related harm may be associated with supervised and unsupervised drinking

- 4.6. We don't have a lot of information about the circumstances surrounding alcohol-related harm. We do know that, nationwide, 75% of alcohol is purchased from places that sell alcohol to be taken away, like bottle stores and supermarkets (off-licensed premises), and 25% of alcohol is purchased to drink on-site at places like restaurants and bars (on-licensed premises).<sup>18</sup>
- 4.7. In theory, **the potential for harm is greater when alcohol is purchased from off-licensed premises** to drink somewhere else rather than places when alcohol is bought to drink on the premises. This is because there are no controls or supervision of drinking once the alcohol is taken away. On-licensed premises, on the other hand, are required to put in place measures to encourage the safe and responsible consumption of alcohol (for example, providing food, non-alcoholic drinks and advice on safe transport options). They are also better placed to observe when someone has become intoxicated, and it is an offence for them to allow this to happen on the premises.
- 4.8. Our early engagement with stakeholders, such as the Police and licensing inspectors, suggests that **most concerns are about the availability of alcohol at off-licences**. Concerns relate to ease of access to alcohol through in-person sales and online sales and delivery.
- 4.9. However, there are indications that **on-licensed premises may also be associated with alcohol-related harm** in the city. Police data, for instance, shows that much alcohol-related harm occurs late at night in parts of the city where there is a concentration of hospitality venues (for example, the central city).<sup>19</sup> Life in Christchurch results also suggest some residents have concerns about harm associated with drinking at some kinds of on-licensed premises (generally pubs, bars and nightclubs rather than cafes and restaurants).<sup>20</sup>

<sup>17</sup> See economic literature review appended to the accompanying research report.

<sup>18</sup> Gray-Phillip, G., Huckle, T., Callinan, S., Parry, C. D. H., Chaiyasong, S., Mackintosh, A.-M., et al. (2018). Availability of alcohol: location, time and ease of purchase in high and middle-income countries: Data from the International Alcohol Control (IAC) study. *Drug and Alcohol Review*.

<sup>19</sup> See 'crime-related alcohol harm data' section of the accompanying research report.

<sup>20</sup> See 'community insight' section of the accompanying research report.

## Communities want more say on alcohol licensing

- 4.10. Our Life in Christchurch survey tells us that **many residents want to have more say about licensed premises in their area.**<sup>21</sup> We've also heard that communities have limited capacity to participate in decision-making processes for alcohol licence applications.
- 4.11. Many people think that alcohol is too easy to get hold of in Christchurch.<sup>22</sup> People have different views on whether existing rules for the sale of alcohol in the district are adequate for addressing alcohol-related harm – about a third think they are and a third think they are not. Views vary in different parts of the city.
- 4.12. Where there's **most agreement is on the need for restrictions on how close licensed premises can be to community facilities.**
- 75% of Life in Christchurch respondents think such restrictions should apply to bottle stores and 65% think restrictions should apply to pubs, bars and nightclubs.
  - When asked which community facilities restrictions should apply to, people most commonly identified early childhood education centres and schools (84% or more) followed by medical/rehabilitation facilities and hospitals (62%) and then parks, playgrounds and sport facilities (55%).

## The Council can help to address some of these issues

- 4.13. The Council has aspirations for Christchurch to be a thriving prosperous city and a place where people have a strong sense of belonging and feel safe. Providing for alcohol to be sold and consumed safely and responsibly in the district while minimising the harm caused by excessive or inappropriate drinking helps to support these aspirations.
- 4.14. The Council is not the only organisation that can address the issues identified in this paper – others include the Police, health and social services, community groups, central government, and licensed premises – but it can assist.
- 4.15. Key issues for the Council to consider are what it can do to help address:
1. Alcohol-related harm in communities, particularly those that are disproportionately affected by alcohol-related harm:
    - a. Communities with high concentration of commercial / hospitality areas
    - b. Communities with high levels of deprivation
  2. The community's desire for more influence on alcohol licensing.
- 4.16. The following discussion of options is based around these matters.

<sup>21</sup> 51% of respondents agreed with the statement 'my community should have more say regarding licensed premises in our neighbourhood.' 11% disagreed and 30% neither agreed nor disagreed.

<sup>22</sup> 49% of agreements agreed, 18% disagreed and 30% neither agreed nor disagreed.



## 5. Identifying options

5.1. The following restrictions and initiatives are already in place to encourage safe and responsible drinking and minimise alcohol-related harm in the city:

- The Sale and Supply of Alcohol Act requires anyone who wants to sell alcohol to hold a licence. The Council appoints the district licensing committee responsible for assessing alcohol licence applications. It also appoints licensing inspectors to monitor compliance with the Act.
- The Act sets default maximum trading hours of 7am-11pm for off-licences and 8am-4am for on-licences. In practice, actual trading hours are often less than the maximum allowed.
- The Act requires licensed premises to meet various host responsibility requirements. Hospitality New Zealand provides training for its members to help them meet these requirements.
- The Council's District Plan places some rules around the location of licensed premises and licensed premises are subject to rules relating to noise and signage.
- The Council's Alcohol Restrictions in Public Places Bylaw identifies alcohol ban areas around the city where people are not allowed to drink alcohol in public places.
- The Council is working in partnership with the Police and Te Whatu Ora to develop a strategic approach to alcohol harm in the city. It also works with the Police, City Mission and the Central City Business Association to address antisocial behaviours and homelessness in the inner city.
- The Police and the Medical Officer of Health have statutory obligations to inquire into alcohol licence applications and inform the district licensing committee of any objections. The Police also play an important role in enforcement and responding to alcohol-related incidents. The Medical Officer of Health has a public health promotion role.
- A range of social agencies provide support to people experiencing alcohol-related harm and people with alcohol addictions.

5.2. We have identified a range of options that the Council could adopt to supplement these measures. They include five options that could form part of a local alcohol policy, and an 'enhanced status quo' option, that would use other measures to reduce alcohol-related harm:

- Option A: Reduce trading hours for off-licences
- Option B: Freeze new licence applications in high deprivation areas
- Option C: Restrict licensed premises from being located close to sensitive sites
- Option D: Reduce trading hours for on-licensed premises in suburban areas
- Option E: Introduce one-way door restrictions
- Option F: Use other measures to reduce alcohol-related harm



- 5.3. **These are possible options rather than Council proposals.** The Council is interested in community views before it decides to proceed with any of these options.
- 5.4. If the Council decides to prepare a draft local alcohol policy, it might choose to start with one or two of these options and then review what further measures are required.

## Option A: Reduce trading hours for off-licensed premises

### Description:

- 5.5. Option A would reduce the maximum trading hours for off-licensed premises from 7am-11pm to 7am-9pm. It would apply to all premises that hold an off-licence, including:
- bottle stores
  - supermarkets
  - small grocery/convenience and specialty stores.
- 5.6. The option would not apply to premises which hold an off-licence under section 40 of the Sale and Supply of Alcohol Act (remote sellers). Remote sellers can sell alcohol online, by phone or by mail order, but not to customers who are physically at their premise. Remote sellers are exempt from trading hours restrictions under the Sale and Supply of Alcohol Act. However, they are bound by the restrictions in the Act regarding the hours they can deliver alcohol.
- 5.7. A local alcohol policy would be required to reduce the default trading hours in the Sale and Supply of Alcohol Act. The policy would provide a transition period to give businesses time to prepare for a change in trading hours.
- 5.8. Licensing data indicates that most of the city's off-licensed premises would be affected by this option. Currently, only 54 of the city's 256 off-licensed premises hold licences requiring them to close by 9pm. Eighty premises are allowed to sell alcohol until 10pm and 105 premises can sell alcohol until 11pm. (There are 25 premises that do not offer a shopfront and can sell alcohol remotely at any time.)

### Rationale:

- 5.9. Option A aims to restrict the accessibility of alcohol that can be purchased for consumption in unsupervised drinking environments at night (after 9pm). Research suggests that reducing the consumption of alcohol is likely to result in a reduction in alcohol-related harm,<sup>23</sup> and that reducing trading hours can be an effective way of reducing alcohol-related harm.<sup>24,25</sup>

<sup>23</sup> Jones, A. and Wilson, N. (2020) Literature Review of Local Interventions to Prevent Alcohol-Related Injuries. Burden of Disease Epidemiology, Equity, and Cost-Effectiveness Programme. Department of Public Health, University of Otago.

<sup>24</sup> Nepal, S., Kypri, K., Tekelab, T., Hodder, R. K., Attia, J., Bagade, T., Chikritizhs, T., and Millier, P. (2020) Effects of Extensions and Restrictions in Alcohol Trading Hours on the Incidence of Assault and Unintentional Injury: Systematic Review. *Journal of Studies on Alcohol and Drugs*, 81(1): 5-23.

- 5.10. The required closing time of 9pm recognises that most alcohol-related harm occurs at night and in the early hours of the morning. Many other councils have set an earlier closing time for off-licensed premises in their districts. Some (like Auckland Council) have set a closing time of 9pm. Others (like Tauranga and Dunedin City Councils) have set a closing time of 10pm. Of our two neighbouring districts, Waimakariri has a closing time of 10pm for off-licensed premises and Selwyn has a closing time of 9pm, but is considering extending this to 10pm.
- 5.11. Option A would not stop people from purchasing large quantities of alcohol earlier in the day for consumption late at night. However, it would restrict people's ability to make late-night decisions to purchase additional alcohol, at a time when they may already have been drinking.
- 5.12. We considered targeting this option to some parts of the city, such as high deprivation areas, which are disproportionately affected by alcohol-related harm. However, it is likely that reducing off-licence trading hours in one area would simply result in people travelling to another area to buy alcohol after 9pm.
- 5.13. We also considered whether this option should only apply to some types of off-licensed premises, such as bottle stores. However, it is likely this would result in people buying alcohol from another place (like a supermarket) instead.
- 5.14. For these reasons, we suggest a consistent approach to off-licence trading hours for all types of off-licensed premises in all parts of the city.
- 5.15. There is some community support for reducing off-licence trading hours, although views are mixed. The Life in Christchurch survey found:
  - For bottle stores in their neighbourhood, 45% think hours are 'about right', 47% 'too long' and 4% 'too short'.
  - For supermarkets, 54% think hours are 'about right', 40% 'too long' and 4% 'too short'.
  - For small grocery/convenience/speciality stores, 44% think hours are 'about right', 49% 'too long' and 3% 'too short'.
- 5.16. There are differences in views between wards. Residents living in Riccarton are more likely to think that current trading hours for bottle stores, supermarkets and other small stores are too long. Burwood residents are more likely to consider trading hours are too long for supermarkets and other small stores that sell alcohol. Banks Peninsula residents, on the other hand, are more likely to support existing off-licence trading hours.

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<sup>25</sup> Miller, P., Tindall, J., Sønderlund, A., Groombridge, D., Lecathelinais, C., Gillham, K., McFarlane, E., de Groot, F., Droste, N., Palmer, D., Warren, I., & Wiggers, J. (2012). Dealing with alcohol-related harm and the night-time economy. <http://hdl.handle.net/10536/DRO/DU:30051885>

## Benefits and disadvantages:

### 5.17. Benefits of option A:

- possible reduction of alcohol-related harm
- greatest impact likely to be felt in higher deprivation areas, which currently have more off-licensed premises with longer trading hours
- addresses concerns of some residents that trading hours for off-licensed premises are too long in their neighbourhood.

### 5.18. Disadvantages of option A:

- effect may be limited if people opt to buy more alcohol earlier in the day
- loss of revenue for off-licensed premises
- additional costs for supermarkets and grocery/convenience stores to cordon off alcohol for sale after 9pm
- risk that some supermarkets and grocery/convenience stores could choose to close early, limiting communities from buying a wider range of products than alcohol after 9pm.

## Questions:

Note – The wording of the questions below are subject to refinement so that they will be easy for people to respond to during engagement and the results simple to analyse. The preliminary questions are:

- Do you agree with reducing the trading hours for off-licensed premises? Why/why not?
- If trading hours are reduced, should the latest closing time be 9pm or 10pm?
- Should a reduction in hours apply to all off-licensed premises or just some types of premises? Which ones - bottle stores? supermarkets? small grocery/convenience/specialty stores? Why?

## Option B: Place a temporary freeze on new licensed premises in high deprivation areas

### Description:

- 5.19. Option B would place a temporary freeze on alcohol licences being issued to new licensed premises in high deprivation areas of the city. Existing licensed premises could renew their alcohol licence, and a licensed premise could change ownership and continue operating. However, no new premises would be granted an alcohol licence while the freeze is in place.
- 5.20. The freeze could be applied to the commercial centres and areas that serve communities with the highest levels of deprivation (generally considered to be those with deprivation scores of 9 and 10). Further catchment analysis would be undertaken to determine the exact areas to be included.
- 5.21. The freeze would be implemented through a local alcohol policy and would be in place until the policy is reviewed. We suggest reviewing the policy within three years.

- 5.22. The freeze could apply to all or some types of licensed premises, including:
- places where alcohol can be purchased and consumed on the premises with a meal (e.g. restaurants and cafes)
  - places alcohol can be purchased and consumed on the premises (e.g. bars, clubs and nightclubs)
  - places where alcohol can be purchased and taken away (e.g. bottle stores, supermarkets and local grocery and specialty stores)
  - other places that sell alcohol (e.g. sports clubs, working men's clubs or winery/cellar doors).
- 5.23. Life in Christchurch findings and our engagement with stakeholders suggest that some of these premises are more likely to be of concern to communities than others.
- 5.24. We are interested in your views.
- 5.25. We also considered a cap on licence numbers rather than a freeze. However, we do not suggest this approach because allowing licensed premises to be replaced risks creating a market for unwanted licences. It would also add administrative costs (by requiring active management of a register of premises in these areas).

### Rationale:

- 5.26. Option B addresses the disproportionate level of alcohol-related harm experienced by high-deprivation communities. It aims to prevent further concentration of licensed premises in these areas, and mitigate the effect that can have on lowering prices and increasing access to cheap alcohol. It would not stop people from buying alcohol, but there would be fewer places to buy alcohol from.
- 5.27. There appears to be some community support for this approach. Some stakeholders have expressed concerns about the proliferation of off-licences in high deprivation areas. Life in Christchurch findings indicate that while communities are broadly comfortable with the number of licensed premises in their neighbourhood:
- almost one in three people (31%) consider there are too many places where alcohol can be purchased and taken away (compared to only 6% to 8% who think there are too many other places to buy alcohol)
  - people in Hornby, Linwood and Riccarton wards are more likely to think there are too many places to buy alcohol to take away in their neighbourhoods (compared to people in other wards)
  - few people would like to see more licensed premises in their neighbourhood, other than cafes and restaurants (32% would like more).
- 5.28. Several councils have placed a freeze on further off-licences in parts of their districts. For example, Auckland has a freeze on further off-licensed premises in the city centre and other centres that have high levels of alcohol-related harm and high numbers of alcohol licences. In Tauranga, no new licences for bottle stores are allowed in suburbs with a social deprivation index of 9 or 10.

## Benefits and disadvantages:

### 5.29. Benefits of option B:

- addresses community concerns about the proliferation of off-licensed premises in high deprivation areas
- reduces the risk of competitive pricing that encourages greater alcohol consumption in these areas
- may prevent further alcohol-related harm in these areas, and possibly reduce it over time as licensed premises close and are not replaced.

### 5.30. Disadvantages of option B:

- could deter supermarkets, grocery stores, cafes and restaurants from investing in high deprivation communities if they are unable to obtain an alcohol licence
- could result in more people drinking in unsupervised environments if neighbourhood on-licensed premises are not able to be replaced.

## Questions:

Note – The wording of the questions below are subject to refinement so that they will be easy for people to respond to during engagement and the results simple to analyse. The preliminary questions are:

- Do you agree with placing a temporary freeze on new licensed premises in high deprivation areas? Why/why not?
- Should a freeze apply to all licensed premises or just some types of premises?
  - Places where alcohol can be taken away – bottle stores? supermarkets? small grocery/convenience/specialty stores? Why?
  - Places where alcohol can be consumed on-site - cafés and restaurants? pubs, bars and nightclubs? Social/sports clubs? Why?

## Option C: Restrict licensed premises from being located close to sensitive sites

### Description:

#### 5.31. Option C would restrict new licensed premises from being located within 100 metres of the following community facilities:

- early childhood centres
- primary and secondary schools
- addiction/rehabilitation facilities
- marae
- places of worship.

#### 5.32. The restriction would apply to all types of licensed premises. However, it would not apply to existing premises seeking to renew their alcohol licence or to existing premises that change ownership. The district licensing committee would also have discretion to consider making an exemption if the applicant has engaged with the local community and can demonstrate that the premise can be managed in a way that addresses their concerns.

- 5.33. A local alcohol policy would be required to restrict licensed premises from being located in close proximity to community facilities.

### Rationale:

- 5.34. Option C responds to community preferences that licensed premises are not located close to certain sensitive sites such as schools.

- 5.35. The rationale for the inclusion of each community facility varies:

- **Early childhood centres and schools** – the Life in Christchurch survey identified a strong community preference for restricting licensed premises from being located close to early childhood centres and schools (about 85%). Concerns are often expressed about the normalising effect of exposing young people to alcohol. There is some research to suggest an association between the proximity of education facilities to licensed premises and risky alcohol consumption by young people.<sup>26</sup> There does not appear to be any research on the effectiveness of sensitive site provisions in local alcohol policies.
- **Addiction/rehabilitation facilities** – two thirds of Life in Christchurch respondents think there should also be restrictions near medical/rehabilitation facilities and hospitals. We suggest that restrictions apply to addiction/rehabilitation facilities, rather than all medical facilities and hospitals, because people with alcohol problems are most affected by being close to licensed premises.
- **Marae and places of worship** – many people think that licensed premises should not be located close to marae (40%) and places of worship (32%). The rationale here is more about respect for these places than preventing alcohol-related harm.

- 5.36. The list of community facilities is similar to definitions of sensitive sites used by other councils in their local alcohol policies. The proposed distance of 100 metres reflects what can reasonably be considered ‘close’ and ensures the restriction is not too expansive. The distance is consistent with approaches taken by other councils, which specify distances of between 50 metres and 150 metres.

### Benefits and disadvantages:

- 5.37. Benefits of option C:

- responds to community preferences
- some potential for reducing harm to vulnerable populations
- reduces the burden on communities to object to licensed premises from being located near sensitive sites – effectively shifting the burden onto licensed premises to demonstrate the potential for harm can be mitigated.

- 5.38. Disadvantages of option C:

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<sup>26</sup> Trapp, G. S., Knuiman, M., Hooper, P., and Foster S. (2018) Proximity to liquor stores and adolescent alcohol intake: A prospective study. *American journal of preventive medicine*, 54(6): 825-830.



- limited impact on reducing alcohol-related harm
- exemption process could be onerous for applicants and communities if they receive frequent requests for engagement
- could limit availability of some amenities (such as cafes and restaurants and bottle stores) in some communities, especially in growth areas where licensed premises do not yet have an established presence.

### Questions:

Note – The wording of the questions below are subject to refinement so that they will be easy for people to respond to during engagement and the results simple to analyse. The preliminary questions are:

- Do you agree with restricting licensed premises from being located close to certain sensitive sites? Why/why not?
- If restrictions are put in place, which community facilities should this restriction apply to?
  - Early childhood education centres? Primary schools? Secondary schools? Addiction and rehabilitation facilities? Marae? Places of worship? Why?
- If restrictions are put in place, is 100 metres too short a distance, too long, or about right?
- Should restrictions apply to all licensed premises or just some types of premises?
  - Places where alcohol can be taken away – bottle stores? supermarkets? small grocery/convenience/specialty stores? Why?
  - Places where alcohol can be consumed on-site - cafés and restaurants? pubs, bars and nightclubs? Social/sports clubs? Why?

## Option D: Reduce trading hours for on-licensed premises in suburban areas

### Description:

- 5.39. Option D would reduce the maximum trading hours for on-licensed premises in suburban areas from 8am-4am to 8am-1am. It would apply to all premises outside the central city (i.e. those located outside the four avenues) that hold an on-licence or a club licence, including:
- cafés and restaurants
  - pubs, bars and nightclubs
  - social and sports clubs.
- 5.40. A local alcohol policy would be required to reduce the default trading hours in the Sale and Supply of Alcohol Act. The policy would provide a transition period to give businesses time to prepare for a change in trading hours.
- 5.41. Licensing data indicates that 78 (16%) of the 487 on-licensed premises that operate outside the central city would be affected by this option. One club would also be affected.

### Rationale:

- 5.42. Option D aims to reduce alcohol-related harm late at night in suburban areas, particularly areas where there is a concentration of on-licensed premises. It aims to restrict the availability of alcohol (after 1am) to reduce how much alcohol is consumed. Research



suggests that reducing the consumption of alcohol is likely to result in a reduction in alcohol-related harm.<sup>27</sup>

- 5.43. The latest closing time of 1am aims to strike a balance between providing for some vibrancy in suburban centres at night while recognising and mitigating the risk of harm associated with long hours of alcohol availability in suburban areas. There is some research showing that reducing trading hours for on-licensed premises can be an effective way of reducing alcohol-related harm.<sup>28</sup>
- 5.44. Other cities that have set earlier closing times for on-licensed premises outside the city centre include Auckland, Tauranga, Hutt City and Invercargill. Auckland Council has set a closing time of 3am for areas outside the city centre; other councils have opted for a 1am closing time.
- 5.45. We considered whether this option should apply to the central city. However, to noticeably minimise alcohol-related harm in the central city, a meaningful reduction of trading hours would be required (i.e. bringing forward the latest closing time from 4am to 1am), which would undermine the Council's objectives to revitalise the central city and provide for late-night licensed premises in the area. We suggest exploring other options to address alcohol-related harm in the central city.
- 5.46. There is some community support for reducing suburban trading hours, although views are mixed. The Life in Christchurch survey found:
  - For pubs, bars and nightclubs in their neighbourhood, 44% think hours are 'about right', 48% 'too long' and 4% 'too short'.
  - For restaurants or cafes, 49% think hours are 'about right', 43% 'too long' and 4% 'too short'.
  - For social/sports clubs, 35% think hours are 'about right', 56% 'too long' and 3% 'too short'.
- 5.47. There are differences in views between wards. Residents living in Riccarton, an area in which there are many on-licensed premises, are less likely to support current trading hours for pubs, bars, nightclubs and social/sports clubs.

## Benefits and disadvantages:

- 5.48. Benefits of option D:
  - possible reduction of alcohol-related harm in suburban areas
  - a reduction in 'nuisance' near where people live (e.g. noise)

<sup>27</sup> Jones, A. and Wilson, N. (2020) Literature Review of Local Interventions to Prevent Alcohol-Related Injuries. Burden of Disease Epidemiology, Equity, and Cost-Effectiveness Programme. Department of Public Health, University of Otago.

<sup>28</sup> Nepal, S., Kypri, K., Tekelab, T., Hodder, R. K., Attia, J., Bagade, T., Chikritizhs, T., and Millier, P. (2020) Effects of Extensions and Restrictions in Alcohol Trading Hours on the Incidence of Assault and Unintentional Injury: Systematic Review. *Journal of Studies on Alcohol and Drugs*, 81(1): 5-23.

- addresses concerns of some residents that trading hours for on-licensed premises are too long in their neighbourhood
- supports the District Plan objective to concentrate late-night activity in the central city
- would focus early morning drinking (from 1am) in the central city, which should be easier to police.

5.49. Disadvantages of option D:

- limited impact as most licensed premises in suburban areas already close by 1am
- loss of revenue for some on-licensed premises
- reduces choices for customers and the vibrancy of suburban nightlife
- risk that people would substitute drinking at on-licensed premises for drinking in unsupervised places (e.g. parties).

### Questions:

Note – The wording of the questions below are subject to refinement so that they will be easy for people to respond to during engagement and the results simple to analyse. The preliminary questions are:

- Do you agree with reducing the trading hours for on-licensed premises in suburban areas? Why/why not?
- If trading hours are reduced, is a closing time of 1am too early, too late, or about right?
  - If too early, prompt for 2am or 3am. If too late, prompt for 11pm, 12am.

## Option E: Introduce one-way door restrictions

### Description:

- 5.50. Option E would involve introducing a one-way door restriction for on-licensed premises from 2am. This means that people would not be able to enter (or re-enter) any on-licensed premises after 2am. Licensed premises could stay open after this time, but once a customer leaves, they could not go back inside again.
- 5.51. One-way doors can be applied as a condition on an alcohol licence (that is, on a case-by-case basis). However, Option E would involve introducing a blanket one-way door restriction through a local alcohol policy. It would apply to all premises that hold an on-licence or club licence, including:
- cafés and restaurants
  - pubs, bars and nightclubs
  - social and sports clubs.
- 5.52. Licensing data indicates that 101 licensed premises would be affected by this option – 63 in the central city and 38 in suburban areas. If Option D (reduced trading hours for on-licensed premises in suburban areas) was implemented with Option E, the one-way door would only apply to premises in the central city.

## Rationale:

- 5.53. Option E would encourage people who are drinking late at night (after 2am) to stay within a licensed premise, which provides a supervised environment where staff can monitor levels of intoxication and patron behaviour. This is more likely to promote safe and responsible drinking and is less likely to result in the harm that can arise from excessive or inappropriate consumption of alcohol, especially when people are moving between hospitality venues late at night.
- 5.54. A one-way door wouldn't stop people drinking; rather, it would help mitigate the risk of harm that can occur when people have been consuming alcohol.
- 5.55. The requirement for the one-way door to be applied at 2am strikes a balance between enabling people to experience multiple bars and restaurants over the course of the evening and recognising the additional risk posed when people have been consuming alcohol for a long period of time. The 2am time is consistent with the approach taken by other councils that have a one-door policy.
- 5.56. There is limited research information on the effectiveness of one-way door requirements. Research on Whangarei's one-way door policy is inconclusive<sup>29</sup>, and research on Australian 'lockout' policies shows mixed results.<sup>30,31</sup>

## Benefits and disadvantages:

- 5.57. Benefits of option E:
- keeps people consuming alcohol in a controlled environment
  - reduces the opportunity for intoxicated people to mix on the streets
  - stops people from exiting venues and topping up and re-entering venues
  - people may be more likely to 'call it a night' once they cannot enter a premises, which could enable earlier and easier city clean-up
  - relatively easy to implement.
- 5.58. Disadvantages of option E:
- uncertain effectiveness – the research is inconclusive about whether one-way door policies work to reduce harm
  - could result in loss of business/revenue for some premises
  - reduces choices for customers and impacts on the vibrancy of the city's nightlife.

<sup>29</sup> Cameron M. P., Brown, J., Cochrane, W., and Robertson, N. (2022) A mixed-methods evaluation of the one-way door and CitySafe patrol policies in Whangarei, New Zealand. PLOS ONE. 17(6): 1-16.

<sup>30</sup> Diab, J. and Moore, M. H. (2022) The Impact of Lockout Laws on Maxillofacial Fractures in South Australia. Journal of Craniofacial Surgery, 33(4): 1071-1075.

<sup>31</sup> Nepal, S., Kypri, K., Pursey, K., Attia, J., Chikritizhs, T., and Millier, P. (2018) Effectiveness of lockouts in reducing alcohol-related harm: Systematic review. Drug and Alcohol Review, 37(4): 527-536.

## Questions:

Note – The wording of the questions below are subject to refinement so that they will be easy for people to respond to during engagement and the results simple to analyse. The preliminary questions are:

- Do you agree with a one-way door policy? Why/why not?
- If a one-way door policy was introduced, is 2am too early, too late, or about right?
  - If too early, prompt for 3am. If too late, prompt for 12am, 1am.

## Option F: Use other measures to reduce alcohol-related harm

### Description:

5.59. Option F would involve using tools other than a local alcohol policy to try to reduce alcohol-related harm, especially in places like the central city, where there is a concentration of hospitality venues. Option F is an ‘enhanced status quo’ option.

5.60. Other tools could include:

- **Community collaboration, such as an alcohol accord** – where the Council, Police, the Medical Officer of Health, licensed premises, and others work together to promote safer alcohol consumption and safer neighbourhoods in a proactive, non-regulatory way.
- **Alcohol bans** – some bans are already in place that prohibit drinking alcohol in public places, such as in the central city and in the Riccarton/University areas. New alcohol ban areas or extended alcohol bans could be considered.
- **Greater use of licensing powers in the Act** – the Act already enables the District Licensing Committee to put in place conditions in relation to licensing on a case-by-case basis (for example, a one-way door policy).
- **Education initiatives** for the city about safe and responsible alcohol consumption.

5.61. Further work would be required to investigate the best use of these tools.

5.62. The tools could be used instead of, or as well as, a local alcohol policy.

### Rationale:

5.63. A local alcohol policy is not the only option available to the Council to help reduce alcohol-related harm. Other tools may be more appropriate for addressing some aspects of the issues described in this paper. For example, alcohol bans can be effective in reducing alcohol-related litter and disorder in public places. Non-regulatory approaches like an alcohol accord could be used to support hospitality venues to provide safe responsible drinking environments, as well as the Council’s objectives for a safe and vibrant central city.

### Benefits and disadvantages:

5.64. Benefits of option F:

- the city already has experience with some of these tools, so they are familiar to the agencies and the hospitality sector
- most tools would not add any new regulatory requirements on licensed premises
- some tools can be driven from within the hospitality sector.

5.65. Disadvantages of option F:

- the uptake of these tools could be low compared to a local alcohol policy, which would provide clear rules on licensing and respond to community preferences
- some of the tools are already being used but the community is still experiencing alcohol-related harm.

## 6. Next steps

- 6.1. The Council is interested in understanding community views on the options discussed in this paper before deciding whether to draft a local alcohol policy.
- 6.2. Council will provide more information, including a survey for you to complete, at [letstalk.ccc.govt.nz](https://letstalk.ccc.govt.nz) when the public engagement opens.
- 6.3. Community feedback on the options being tested will be used to help provide further advice to the Council.
- 6.4. If the Council decides to continue work to develop a local alcohol policy, we will prepare a draft local alcohol policy for consultation. The community will have the opportunity to comment on the draft policy, and speak to the Council, before the policy is finalised.