
Christchurch City Council AGENDA

Notice of Meeting Te Pānui o te Hui:

An ordinary meeting of the Christchurch City Council will be held on:

Date: **Wednesday 11 June 2025**

Time: **10.30am**

Venue: **Boardroom, Fendalton Service Centre, Corner Jeffreys
and Clyde Roads, Fendalton**

Membership

Chairperson	Mayor Phil Mauer
Deputy Chairperson	Deputy Mayor Pauline Cotter
Members	Councillor Kelly Barber
	Councillor Melanie Coker
	Councillor Celeste Donovan
	Councillor Tyrone Fields
	Councillor James Gough
	Councillor Tyla Harrison-Hunt
	Councillor Victoria Henstock
	Councillor Yani Johanson
	Councillor Aaron Keown
	Councillor Sam MacDonald
	Councillor Jake McLellan
	Councillor Andrei Moore
	Councillor Mark Peters
	Councillor Tim Scandrett
	Councillor Sara Templeton

5 June 2025

Principal Advisor

Mary Richardson
Chief Executive
Tel: 941 8999

mary.richardson@ccc.govt.nz

Meeting Advisor

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Democratic Services Advisor
Tel: 941 5112

natasha.mcdonnell@ccc.govt.nz

Website: www.ccc.govt.nz

Note: The reports contained within this agenda are for consideration and should not be construed as Council policy unless and until adopted. If you require further information relating to any reports, please contact the person named on the report.

To watch the meeting live, or previous meeting recordings, go to:

<http://councillive.ccc.govt.nz/live-stream>

To view copies of Agendas and Minutes, go to:

<https://www.ccc.govt.nz/the-council/meetings-agendas-and-minutes/>



What is important to us?

Our Strategic Framework is a big picture view of what the Council is aiming to achieve for our community

Our focus this Council term 2022–2025

Strategic Priorities



Be an inclusive and equitable city which puts people at the centre of developing our city and district, prioritising wellbeing, accessibility and connection.



Champion Ōtautahi-Christchurch and collaborate to build our role as a leading New Zealand city.



Build trust and confidence in the Council through meaningful partnerships and communication, listening to and working with residents.

Adopted by the Council on 5 April 2023



Reduce emissions as a Council and as a city, and invest in adaptation and resilience, leading a city-wide response to climate change while protecting our indigenous biodiversity, water bodies and tree canopy.



Manage ratepayers' money wisely, delivering quality core services to the whole community and addressing the issues that are important to our residents.



Actively balance the needs of today's residents with the needs of future generations, with the aim of leaving no one behind.

Our goals for this Long Term Plan 2024–2034

Draft Community Outcomes



Collaborative and confident

Our residents have the opportunity to actively participate in community and city life, have a strong sense of belonging and identity, and feel safe.



Green and liveable

Our neighbourhoods and communities are accessible and well connected, supporting our goals to reduce emissions, build climate resilience and protect and regenerate the environment, especially our biodiversity, water bodies and tree canopy.

To be adopted by the Council as part of the Long Term Plan 2024–2034



A cultural powerhouse

Our diverse communities are supported to understand and protect their heritage, pursue their arts, cultural and sporting interests, and contribute to making our city a creative, cultural and events 'powerhouse'.



Thriving and prosperous

Our city is a great place for people, business and investment where we can all grow our potential, where enterprises are innovative and smart, and where together we raise productivity and reduce emissions.

Our intergenerational vision

A place of opportunity for all.

Open to new ideas, new people,
new investment and new ways
of doing things – a place where
anything is possible.



Ngāi Tahu has rangatiratanga over its takiwā – the Council is committed to partnering with Ngāi Tahu to achieve meaningful outcomes that benefit the whole community

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Karakia Whakamutunga

Karakia Tīmatanga

Whakataka te hau ki te uru
Whakataka te hau ki te tonga
Kia mākinakina ki uta
Kia mātaratara ki tai
E hī ake ana te atakura
He tio, he huka, he hau hū
Tihei mauri ora

1. Apologies Ngā Whakapāha

Apologies will be recorded at the meeting.

2. Declarations of Interest Ngā Whakapuaki Aronga

Members are reminded of the need to be vigilant and to stand aside from decision making when a conflict arises between their role as an elected representative and any private or other external interest they might have.



3. Draft Local Alcohol Policy

Reference Te Tohutoro: 25/955633

Responsible Officer(s) Te Pou Matua: Thomas Lee, Principal Advisor Policy

Accountable ELT: John Higgins, General Manager Strategy, Planning & Regulatory

Member Pouwhakarae: Services

1. Purpose and Origin of the Report Te Pūtake Pūrongo

- 1.1 The purpose of this report is for the Council to hear submissions on the draft Local Alcohol Policy.

2. Officer Recommendations Ngā Tūtohu

- That the Council:
1. Receives the information in the Draft Local Alcohol Policy report.

3. Detail Te Whakamahuki

- 3.1 The Council, at its meeting on 16 April 2025, approved the release of a draft Local Alcohol Policy (Attachment A) for public consultation.
- 3.2 Under sections 78 and 79 of the Sale and Supply of Alcohol Act 2012, any council wishing to have a Local Alcohol Policy must produce a draft Policy (section 78) for consultation using the special consultative procedure (section 79).
- 3.3 The special consultative procedure (section 83 of the Local Government Act 2002) requires councils to, among other things, consult on a statement of proposal (the draft Local Alcohol Policy) for at least one month and to provide submitters the opportunity to make deputations.
- 3.4 Accordingly, consultation on the draft Local Alcohol Policy opened on 17 April 2025 and closed on 18 May 2025. The total number of submitters was 416, of which 33 wish to be heard.
- 3.5 The Council will hear from submitters at this meeting and then deliberate on the draft Local Alcohol Policy at a future meeting.

Attachments Ngā Tāpirihanga

No.	Title	Reference	Page
A	Draft Local Alcohol Policy 2025	25/1040762	6

Statement of proposal

Draft Local Alcohol Policy 2025

Christchurch City Council Local Alcohol Policy

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1. Introduction

- 1.1. The Sale and Supply of Alcohol Act 2012 (**'the Act'**) provides a system of control for the sale and supply of alcohol in New Zealand.
- 1.2. The object of the Act (section 4) is that: the sale, supply, and consumption of alcohol should be undertaken safely and responsibly; and the harm caused by the excessive or inappropriate consumption of alcohol should be minimised.
- 1.3. The Act also allows councils to develop policies on how alcohol should be sold and supplied in their districts in order to meet the objectives of the Act.
- 1.4. On 5 June 2024, the Christchurch City Council (**'the Council'**) resolved to commence work on development of a Local Alcohol Policy (**CNCL/2024/00072**). This Local Alcohol Policy (**'the Policy'**) has been produced pursuant to that resolution.
- 1.5. The Council developed the Policy having regard to the information stated under s78(2) of the Act, which the Council published in a **research report** in February 2025. The Council also consulted the New Zealand Police, Medical Officers of Health, and Licensing Inspectors as required by s78(4) of the Act.
- 1.6. This document constitutes the Council's Local Alcohol Policy for the Christchurch and Banks Peninsula District (**'the district'**).

2. Purpose

- 2.1. The purpose of the Policy is to set out the Council's policy positions on the following licensing matters, pursuant to section 77(1) of the Act:
 - maximum trading hours;
 - location of licensed premises by reference to proximity to premises or facilities of a particular kind or kinds; and
 - whether further licences (or licences of a particular kind or kinds) should be issued for premises in the district or any stated part of the district.

3. Policy Scope

- 3.1. The Policy cannot and does not contain policy positions on matters that:
 - are not related to licensing; or,
 - are outside the scope of section 77(1) of the Act.
- 3.2. In accordance with the Act, the District Licensing Committee (**'DLC'**) and the Alcohol Regulatory Licensing Authority (**'ARLA'**) must have regard to the Policy when issuing or renewing licences in the district.

4. Policy Statement

- 4.1. The principal objectives of the Policy are to provide policy direction so that alcohol licensing decisions:
 - are consistent with the object of the Act;
 - are proportionate; and,
 - reflect the views of local communities.
- 4.2. The Policy enters into force on **[DATE (at least 30 days after it is publicly notified)]**, except for clause **[5.2 (trading hours policy)]** which will enter into force on **[DATE (no earlier than 3 months after publicly notified)]**.

5. Maximum trading hours for off-licences

- 5.1. Research suggests that reducing trading hours can be an effective way of reducing alcohol-related harm. Focusing on the night trading hours of off-licences recognises that most alcohol-related harm occurs at night or in the early hours of the morning. This policy provision restricts people's ability to make late-night decisions to purchase additional alcohol to be consumed in an unsupervised environment when they may have already been drinking.
- 5.2. Pursuant to sections 77(1)(e) and 45 of the Act, the maximum trading hours for off-licences in the district are 7.00am to 9.00pm, Monday to Sunday. This policy provision applies to new and existing off-licences.
- 5.3. No off-licences should be issued with longer trading hours than those specified in clause 5.2.
- 5.4. The Council's policy position on maximum trading hours is not intended to set an expectation that the DLC or ARLA should issue every off-licence with the maximum hours. The DLC and ARLA may issue licences with more restrictive hours than the maximum trading hours specified in clause 5.2.

6. Freeze on the issue of new off-licences

- 6.1. This policy provision aims to address the disproportionate level of alcohol-related harm experienced by higher-deprivation communities by preventing further concentration of off-licensed premises in these areas.
- 6.2. The Council's policy position is that:
 - 6.2.1. there should be a freeze on the issuing of new off-licences in the areas of high deprivation specified and shown in **Appendix 1**; and
 - 6.2.2. where the freeze applies, the DLC and ARLA should refuse to issue any new off-licences.
- 6.3. An applicant can apply for an exemption to this policy provision if they can show in their application that the primary purpose of their business is not the sale and supply of alcohol.
- 6.4. The presumption of a freeze does not apply to applications for new off-licence premises located outside of the areas specified and shown in **Appendix 1**. However, the DLC and ARLA may consider whether issuing the licence would, in its opinion, contribute to the further concentration of off-licensed premises servicing high-deprivation areas.
- 6.5. This policy provision does not apply to:
 - 6.5.1. renewals of existing off-licences;
 - 6.5.2. a change of business ownership for premises where an off-licence exists prior to the commencement of the Policy.

7. Restriction on the location of new bottle stores

- 7.1. This policy provision responds to community preferences that bottle stores are not located close to sites where exposure to alcohol should be minimised, or certain parts of the population may be vulnerable. These sites are considered 'sensitive sites'.
- 7.2. The Council's policy position is that, subject to the requirements of any resource consent or District Plan rule, licences will not be issued for new bottle stores that are proposed to be located:
 - 7.2.1. within 200 metres of primary or secondary education facilities or addiction treatment/rehabilitation facilities outside of the Central City
 - 7.2.2. within 50 metres of primary or secondary education facilities within the Central City

- 7.2.3. within 100 metres of addiction treatment / rehabilitation facilities within the Central City.
- 7.2.4. within 50 metres of primary or secondary education facilities or addiction treatment/ rehabilitation facilities in Banks Peninsula.
- 7.3. The policy provision stated in clause 7.2. of the Policy shall not apply to applications made in respect of sites located within the City Centre Zone as shown in **Appendix 2**.
- 7.4. An applicant can apply for an exemption to this policy provision if they can show they have engaged with the affected community and can demonstrate in their application that they can manage the premises in a way that addresses any concerns.
- 7.5. This policy provision does not apply to:
 - 7.5.1. renewals of existing licences;
 - 7.5.2. a change of business ownership for premises where a licence exists prior to the commencement of the Policy.

8. Review of Policy

- 8.1. The Policy will be reviewed by the Council no later than six years from the commencement of the Policy, as required by section 97 of the Act.

9. Definitions

- 9.1. For the purpose of the Policy, the table below defines certain terms.
- 9.2. Unless the context requires another meaning, terms and expressions used but not defined in the Policy that are defined in the Sale and Supply of Alcohol Act 2012, have the same meaning as in that Act.

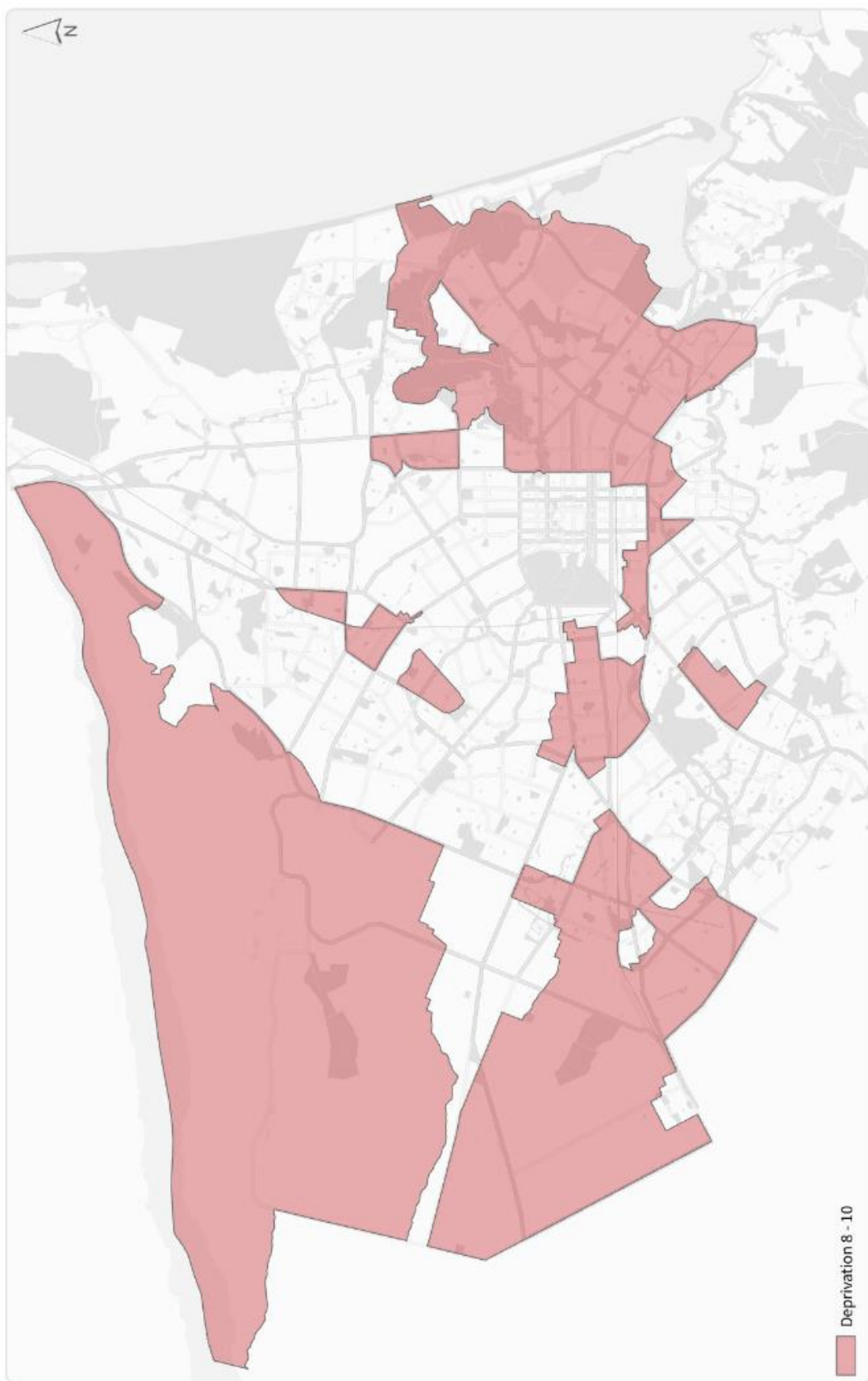
TERM	DEFINITION
Act	means the Sale and Supply of Alcohol Act 2012
Addiction treatment/ rehabilitation facilities	means premises where people are receiving residential or day treatment for addiction and/or are undertaking rehabilitation.
Area of high deprivation	means areas measured at a deprivation level of 8–10 using the New Zealand Index of Socioeconomic Deprivation (NZDep). <i>Note: NZDep uses a scale between 1 (being low deprivation) and 10 (being high deprivation) and measures deprivation based on census data across eight dimensions: communication, income, employment, qualifications, home ownership, support, living space, and dwelling condition.</i>
Banks Peninsula	means the area defined as within the boundaries of the Banks Peninsula Community Board Ward.
Bottle store	means retail premises where at least 85% of the annual sales revenue is expected to be earned from the sale of alcohol for consumption somewhere else. (See section 32(1) of the Act).
Central City	means that part of city contained within Bealey, Fitzgerald, Moorhouse, Deans and Harper Avenues. <i>Note: This is based on the definition of 'Central City' in the Christchurch District Plan as of 7 April 2025.</i>

City Centre Zone	is the area shown in the map attached as Appendix 2 . <i>Note: This is based on the definition of 'City Centre Zone' in the Christchurch District Plan as of 7 April 2025.</i>
New licence (or application for a new licence)	means an application for a licence for a premises that has not traded pursuant to licence prior to the commencement of the Policy.
Primary education facilities	means a facility for the provision of 'primary education' as defined in section 10 of the Education and Training Act 2020.
Secondary education facilities	Means a facility for the provision of 'secondary education' as defined in section 10 of the Education and Training Act 2020.
Sensitive sites	means facilities and places where the community has indicated exposure to alcohol should be minimised. For the purposes of the Policy, these are: <ul style="list-style-type: none"> • Primary and secondary education facilities • Addiction treatment / rehabilitation facilities.
Supermarket	Means premises (that in the opinion of the DLC) are a supermarket with a floor area of at least 1000m ² (including any separate departments set aside for such foodstuffs as fresh meat, fresh fruit and vegetables, and delicatessen items).

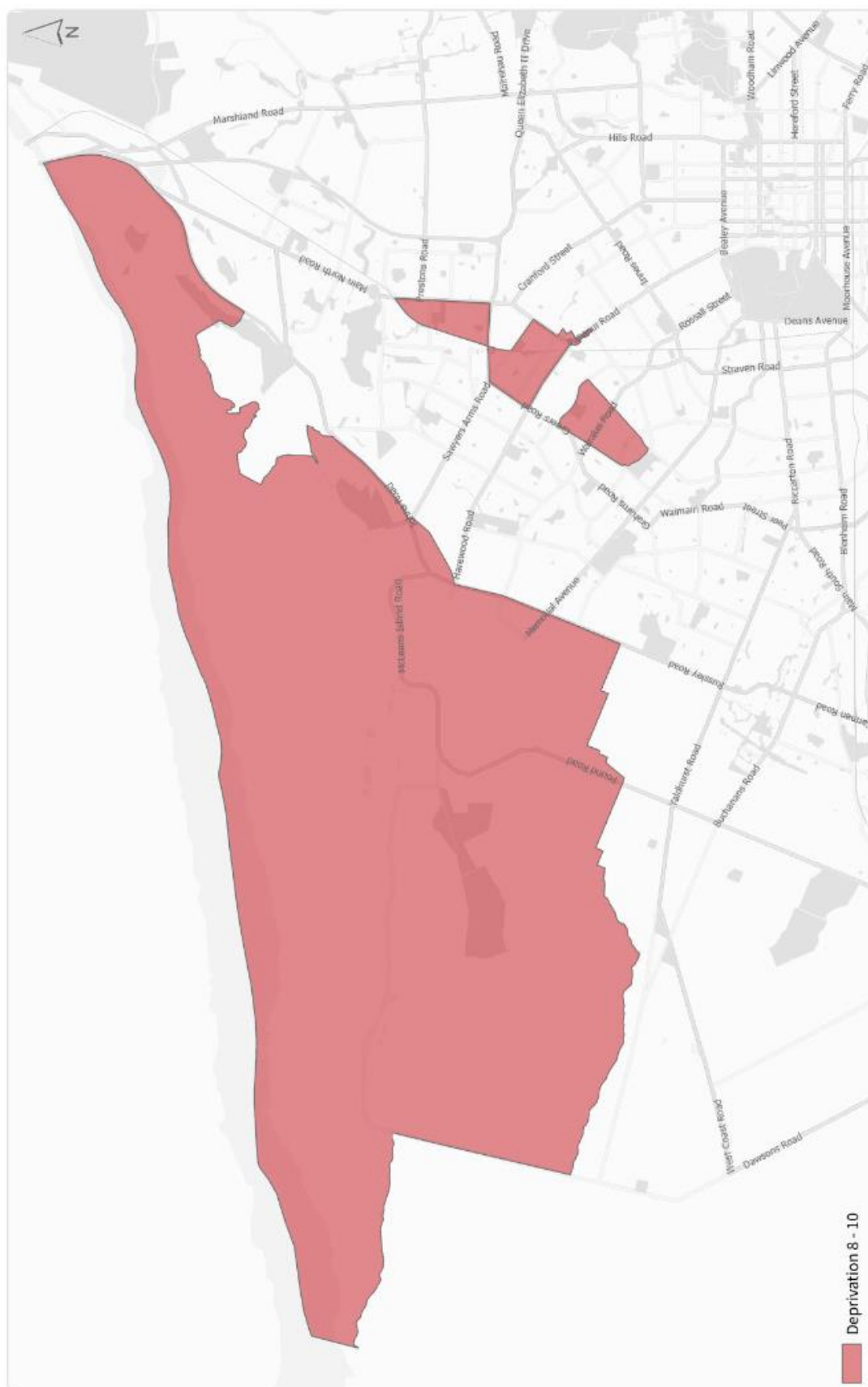
10. Administrative information

Policy name	Local Alcohol Policy
Adoption date	Date Council adopted the policy
Date of most recent review	Date Council adopted changes to the policy
Resolution number	CNCL
Review date	Date policy to be next reviewed (or before, if required)
Owning group/unit	Strategic Policy and Resilience
Team responsible / role	Strategic Policy

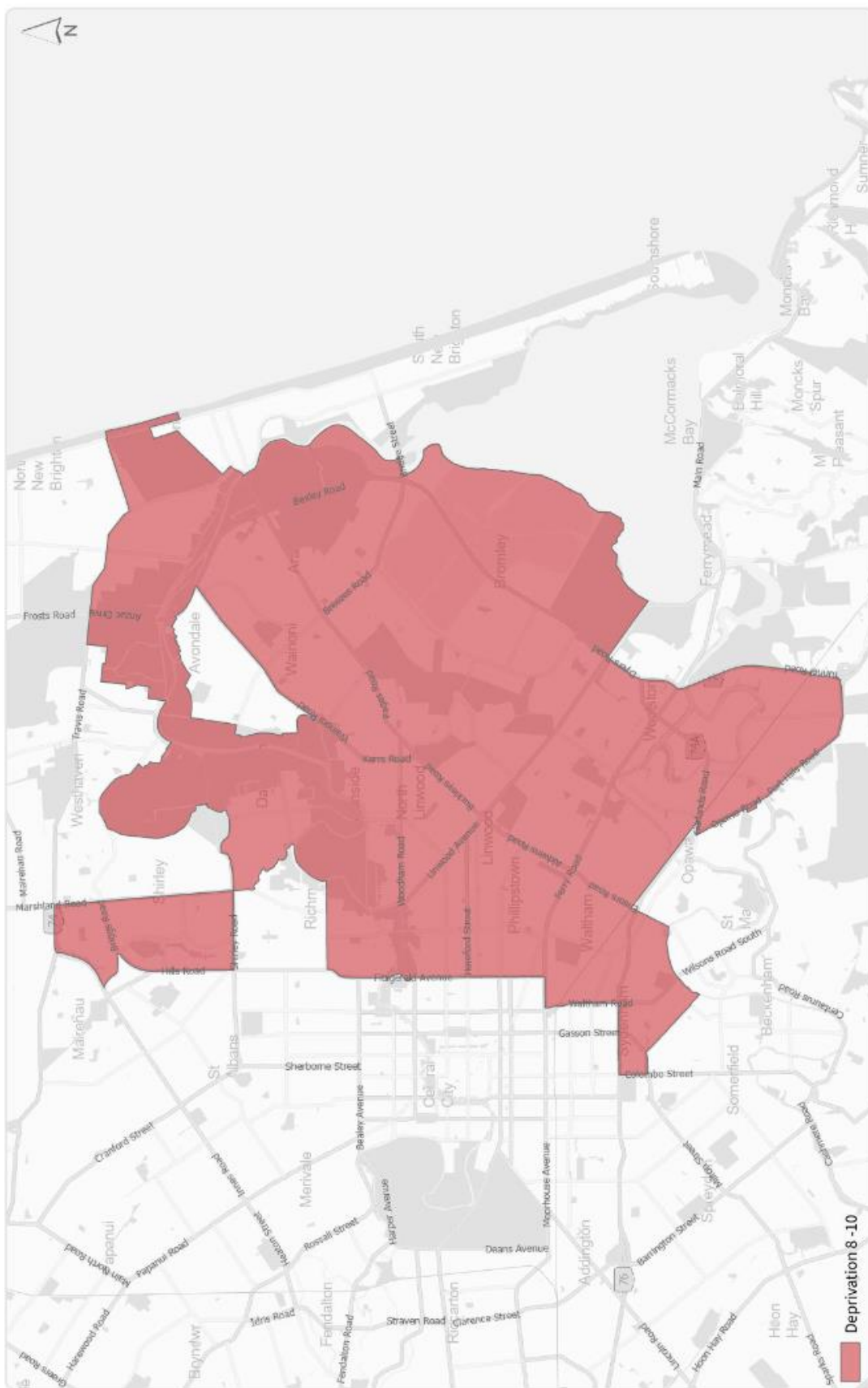
Appendix 1 Map of district showing areas measured at a deprivation level of 8 – 10



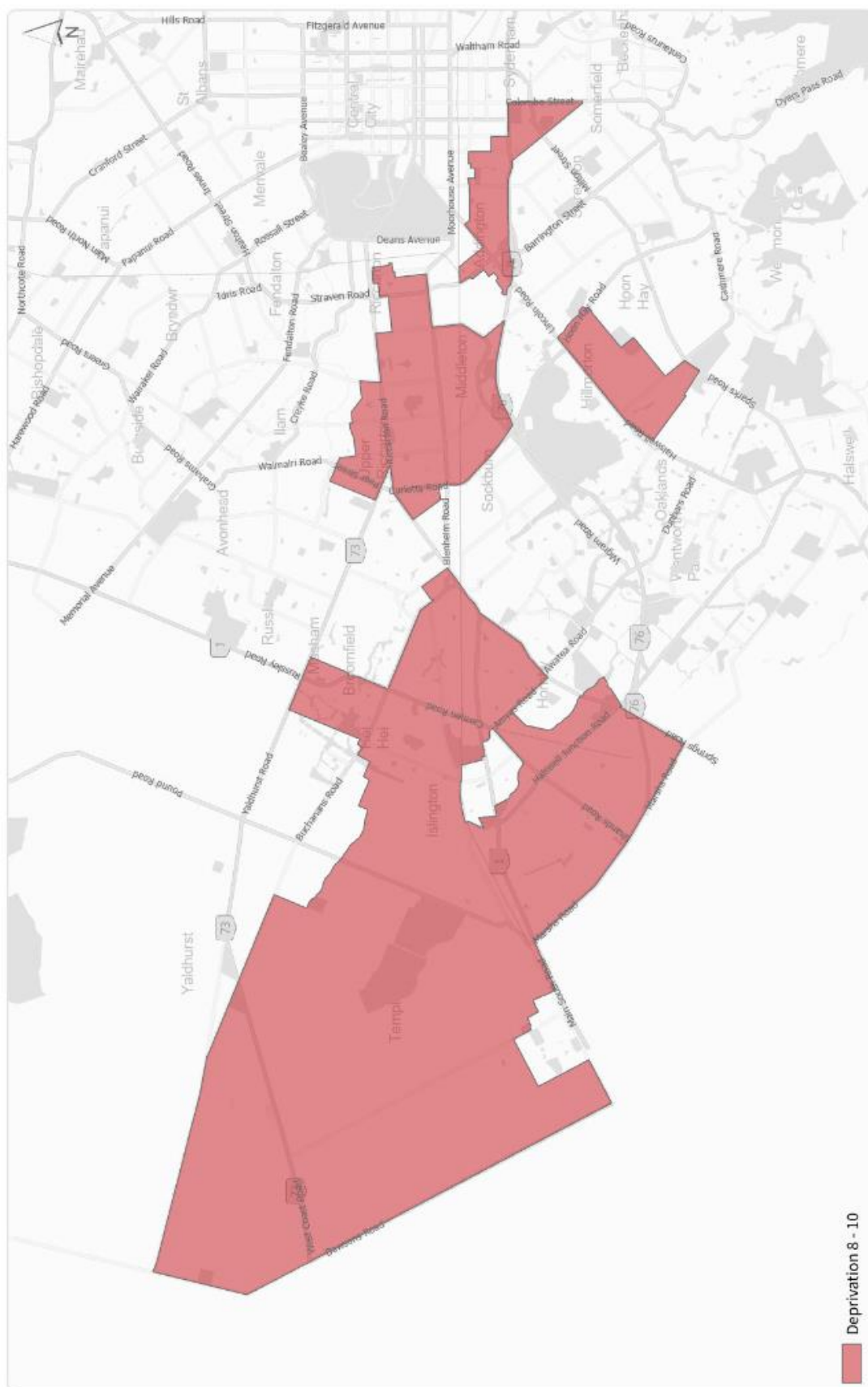
Appendix 1A Map of the northwest of the district showing areas measured at a deprivation level of 8 – 10



Appendix 1B



Appendix 1C Map of the southwest of the district showing areas measured at a deprivation level of 8 – 10



Appendix 2 City Centre Zone



4. Volumes of Submissions - Draft Local Alcohol Policy

Reference Te Tohutoro: 25/1093727

Responsible Officer(s) Te Pou Matua: Natasha McDonnell, Democratic Services Advisor

Accountable ELT Member Pouwhakarae: Helen White, General Counsel / Director of Legal & Democratic Services

1. Purpose Te Pūtake Pūrongo

- 1.1 The purpose of this report is to provide the Council with:
 - 1.1.1 All submissions received on the Draft Local Alcohol Policy.
 - 1.1.2 A schedule of submitters who wish to speak to their submission during the hearings.
- 1.2 **Attachment A** contains a schedule of submitters who will speak to their submission during the hearings and a copy of their submission.
- 1.3 **Attachments B - E** contains a table of submitters who do not wish to be heard (including those submitters who originally wished to be heard but no longer wish to be heard). Also included (in corresponding order) is a table with their submissions.
- 1.4 Note, that the Local Government Act 2002 requires, as one of the principles of consultation, that “the views presented to the local authority should be received by the local authority with an open mind and should be given by the local authority, in making a decision, due consideration” (section 82(1) (e).

Attachments Ngā Tāpirihanga

No.	Title	Reference	Page
A	Schedule of submitters who wish to be heard	25/1093766	18
B	Schedule of submitters who did not wish to be heard - Vol 1 (Under Separate Cover)	25/1110880	
C	Schedule of submitters who did not wish to be heard - Vol 2 (Under Separate Cover)	25/1110881	
D	Schedule of submitters who did not wish to be heard - Vol 3 (Additional Documents - Circulated Separately)	25/1110882	
E	Schedule of submitters who did not wish to be heard - Vol 4 (Additional Documents - Circulated Separately)	25/1110883	

Wednesday 11 June 2025		
Time	Name	Submitter Number
10.30am	Staff presentation	
10.50am	Paul McMahon – Waitai Coastal-Burwood-Linwood Community Board	205
10.55am		
11.00am	Callum Ward – Waihoru Spreydon-Cashmere-Heathcote Community Board	376
11.05am		
11.10am	Emma Norrish – Waipapa Papanui-Innes-Central Community Board	364
11.15am		
11.20am	David Hawke – The Halswell Residents Association Incorporated	333
11.25am		
11.30am	Jennifer Lamm & Andrew Galloway – Alcohol Healthwatch	355
11.35am		
11.40am	Nikki Rodgers & Genaea Calvert – Hospitality New Zealand	359
11.45am		
11.50am	William Jones	347
11.55am	Break – 15 minutes	
12.20pm	Marco Duff	35
12.25pm	Wayne Hawker	48
12.30pm	Kent Mahon & Summer Pringle – Food Stuffs South Island	375
12.35pm	Lunch – 45 minutes	
1.20pm	Bruce Tulloch	126
1.25pm	Dr. Liz Gordon	209
1.30pm	Lisa Cowe	391
1.35pm	Jo Bader - Aviva	408
1.40pm		
1.45pm	Sarah McKay – Social Equity and Wellbeing Network	401
1.50pm		
1.55pm	Paul Radich – General Distributors Limited, Woolworths	377
2.00pm	Marilyn Chong	204
2.05pm	Frank Davidson – Frank's Liquor, Misceo Café Bar & Restaurant	371
2.10pm	Richard Peebles – Peebles Group Ltd	368
2.15pm	Ruth Spearing	388
2.20pm	Adela Kardos – University of Canterbury	374
2.25pm		
2.30pm	Break – 15 minutes	
2.45pm	Brodie Marra-Stevenson – Waipuna St John of God Hauora Trust	400
2.50pm		
3.00pm	Belinda & John Symon, Carolyn Moffat, Jagroop Singh, Manoj Bishnoi & Greg Hoar – Superliquor Franchisees	242, 369, 356,
3.05pm		358
3.10pm	Greg Hoar – Superliquor Holdings Limited	378

3.15pm	Break – 10 minutes	
3.25pm	Pavneet Nagra	155
3.30pm	Christchurch Youth Council Incorporated	395
3.35pm		
3.40pm	Marie Pollisco - Waipuna Halswell-Hornby Riccarton Community Board	363
3.45pm		
3.50pm	Dr. Cheryl Brunton – Te Whatu Ora	411
3.55pm		
4.00pm		
4.05pm	David Robertson – New Zealand Police Alcohol Harm Unit	416
4.10pm		
No longer wish to speak		
	Robyn Elizabth C. Pearson	
	Lily Kingdom	

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 09/05/2025

First Name: (required) Paul Last Name: (required) McMahon

Please provide the organisation name:
(required)

Waitai Coastal-Burwood-Linwood Community
Board

Your role and the number of people your
organisation represents: (required)

Chairperson

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

We know from the evidence gathered by the Council that a significant portion of alcohol related harm occurs between 9pm-12am. We also know from New Zealand^[1] and international evidence^[2] that earlier off-license closing reduces harm.

[1] Taisia Huckle, Jose S. Romeo, Karl Parker, and Sally Casswell, "The Impact of Alcohol Trading Hour Restrictions on Night-Time Violence in New Zealand," *Injury Prevention* 26, no. 2 (2020): 173–179, <https://doi.org/10.1136/injuryprev-2019-043243>.

[2] Jo-An Atkinson et al., "Impacts of Licensed Premises Trading Hour Policies on Alcohol-Related Harms," *Addiction* 113, no. 7 (2018): 1244–1251, <https://doi.org/10.1111/add.14178>

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

205

We support the freeze because high-deprivation communities already have an undue burden of alcohol harm and too many off-licenses. If people want to open new bottle stores they should do it in places that are not as vulnerable.

Higher alcohol outlet density and proximity in deprived areas of New Zealand are associated with increased alcohol consumption, hazardous drinking, and related harms, including crime.^[1]

[1] Jennie L. Connor, Kypros Kypri, Melanie L. Bell, and Kimberly Cousins, "Alcohol Outlet Density, Levels of Drinking and Alcohol-Related Harm in New Zealand: A National Study," *Journal of Epidemiology and Community Health* 65, no. 10 (2011): 841–846, <https://doi.org/10.1136/jech.2009.104935>;

Matthew Hobbs, Lukas Marek, Malcolm Campbell, and Joreintje D. Mackenbach, "Associations between Alcohol Outlets and Crime and Disorder in New Zealand: A National Study," *Health & Place* 65 (2020): 102397, <https://doi.org/10.1016/j.healthplace.2020.102397>;

Gordon C. Hay, Paul Whigham, Kypros Kypri, and Jennie L. Connor, "Neighbourhood Deprivation and Access to Alcohol Outlets: A National Study," *Health & Place* 15, no. 4 (2009): 1086–1093, <https://doi.org/10.1016/j.healthplace.2009.05.008>;

Public Health Communication Centre, "Local Alcohol Policies—What's the Opportunity to Reduce Harm?" (Policy Briefing, 2024), <https://www.phcc.org.nz/briefing/local-alcohol-policies-whats-opportunity-reduce-harm>.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

New Zealand research provides robust evidence linking alcohol advertising to increased consumption, particularly among youth.

New Zealand children are regularly exposed to alcohol marketing across various environments (an average of 4.5 times a day), with higher exposure rates among Māori (5 times more than 4.5 times a day) and Pacific children (3 times more than the 4.5 times a day). The vast proportion (75%) of this advertising is from nearby licensed premises. The majority of schools (56%) have at least one alcohol advertisement within 500m, and 63% of those advertisements were near low-decile (i.e. deprived) schools.
^[1]

[1] Sneyd, Sarah, Noor Al-Jebouri, Helina Gifawossen, Nathan Cowie, and Nicki Jackson. "Alcohol Advertising Near Schools in Tāmaki Makaurau Auckland." *New Zealand Medical Journal* 136, no. 1584 (October 20, 2023). <https://nzmj.org.nz/journal/vol-136-no-1584/alcohol-advertising-near-schools-in-tamaki-makaurau-auckland>.

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

I'm not sure

205

Please tell us why you're not sure:
No Comment

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:
No Comment

General feedback

Do you have any other comments?

The Board supports the very modest proposals in the Draft Local Alcohol Policy 2025 and is especially pleased to see a focus on off-licenses, where the vast bulk of alcohol is purchased from for the lowest price.

We note that there is a new bottlestore application in Avonside that would be precluded if the Draft Local Alcohol Policy 2025 were adopted: in a deprived area (decile 8, where 10 is the most deprived) and ~160m from a primary school and kindergarten.

The Board notes that many of the most deprived areas of Christchurch are within the Waitai Area, so our communities stand to benefit the most from more stringent measures like those proposed in the Draft.

The Board supports the goal of a vibrant hospitality sector and notes that it is important suburban villages like New Brighton are easy places for suitable applicants to obtain on-licenses, provided there is robust oversight ensuring host responsibilities are met.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Item 4

Attachment A

376

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Callum Last Name: (required) Ward

Please provide the organisation name:
(required)

Waihoru Spreydon-Cashmere-Heathcote
Community Board

Your role and the number of people your
organisation represents: (required)

Chairperson

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

The Board supports a maximum time of 9pm daily as a lever to minimise alcohol-related harm in the community.

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

Yes

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Submission - Waihoru Spreydon-Cashmere-Heathcote Community Board - Draft Local Alcohol Policy - May 2025 

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Christchurch
City Council 

16 May 2025

03 941 8999

Multicultural Recreation and Community
Centre, 455 Hagley Avenue, Christchurch 8011

ccc.govt.nz


Engagement Advisor
Christchurch City Council
letstalk@ccc.govt.nz

Kia ora

Submission on Draft Local Alcohol Policy

The Waihoru Spreydon-Cashmere-Heathcote Community Board appreciates the opportunity to submit feedback on the Christchurch City Council's Draft Local Alcohol Policy (LAP) and thanks staff for their work on the draft policy.

The Board's vision is to ensure our communities are engaged, safe, and connected, with a strong focus on the well-being of our residents. As a statutory body, our role is to advocate for the interests of the community (Local Government Act 2002, section 52).

This submission builds on feedback the Board submitted during the early engagement process in March 2025. The Board held a Community Workshop on 27 February 2025 that helped to inform that feedback.

The Board supports the development of a Draft LAP and submits the following specific points:

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

The Board supports the reduction of off-licence trading hours to 9pm daily. The Board supports this policy applying to all off licence venues, including supermarkets as this will ensure a level playing field amongst retailers. The Board supports a maximum time of 9pm daily as a lever to minimise alcohol-related harm in the community.

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

The Board supports a freeze on new off-licences in high deprivation areas. The Board acknowledges the proliferation of off-licence retailers in high-deprivation areas and the in alcohol related harm to those in the community.

The Board acknowledges clause 6.4 of the Draft LAP attempts to deal with situation where a licence could be sought close to a high deprivation area. However, the Board believes there should be greater flexibility to identify specific areas which the community determine should have alcohol restrictions, but do not fall within the derivation or sensitive site definitions.

Policy 3: Restrict new bottle stores near sensitive sites

The Board supports a restriction on new bottle stores near sensitive sites that include addiction treatment/rehabilitation, primary and secondary schools. This policy will support the community by reducing the exposure of young and vulnerable people to the advertising and availability of alcohol.

Concerns about the application of policies 2 and 3 across the Waihoru Spreydon-Cashmere-Heathcote Community Board area

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Christchurch
City Council 

The Board has considered the geographical application of policies 2 and 3 across the Board's area. The Board has identified a specific area that the Board considers should be included as restricted despite not falling within areas defined by deprivation of sensitive sites. The area is from Lincoln Road stretching from the intersection at Moorhouse Avenue to Clarence Street South (refer map).

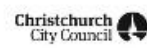
The Board would like to speak to this submission.

Your sincerely

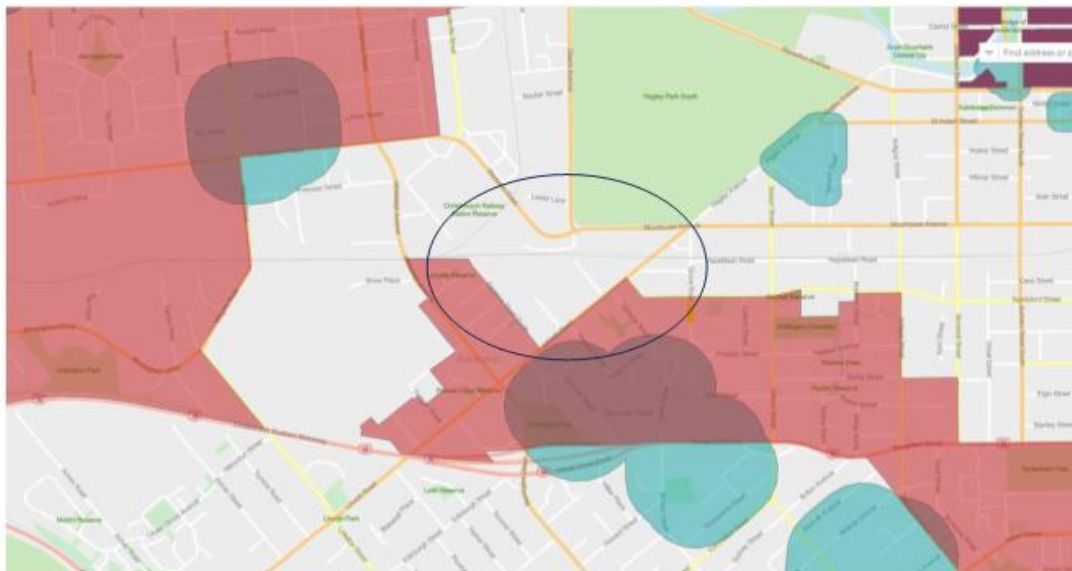


Callum Ward
Chairperson
Waihoru Spreydon-Cashmere-Heathcote Community Board
Christchurch City Council

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Lincoln Road to Clarence Street South
Area within circle



Letter reference number or info
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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Emma Last Name: (required) Norrish

Please provide the organisation name:
(required)

Waipapa Papanui-Innes-Central Community
Board

Your role and the number of people your
organisation represents: (required)

Chairperson - Papanui-Innes-Central wards

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

The Board has considered its community's interest in reducing alcohol-related harm, and also particularly the rationale in the [Local Alcohol Policy – Issues and Options Report](#) (January 2025) for restricting access to alcohol that can be purchased for consumption in unsupervised drinking environments at night (after 9pm). That report noting that "[r]esearch suggests that reducing the consumption of alcohol is likely to result in a reduction in alcohol-related harm, and that reducing trading hours can be an effective way of reducing alcohol-related harm."

The Board supports having a consistent closing time across the different off-licence types for this option, and wishes to see that the onus would be on applicants for later closing times to justify this in their application – approving later closing times should be a matter of the District Licensing Committee needing to be satisfied the application can be granted in this respect as an exception to a 9pm default in the specific circumstances.

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I'm not sure

Please tell us why you're not sure:

The Board noted that the [Local Alcohol Policy – Issues and Options Report](#) (January 2025) indicates that "[t]he freeze could be applied to the commercial centres and areas that serve communities with the highest levels of deprivation (generally considered

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to be those with deprivation scores of 9 and 10)", and "[f]urther catchment analysis would be undertaken to determine the exact areas to be included". If the evidence supports that this option would reduce alcohol-related harm in our most vulnerable communities, the Board would be supportive of the "further catchment analysis" being appropriately targeted to achieving this end.

The Board notes that when staff have presented to the Board, the indication was that some respondents surveyed in the Board area said there were too many places where alcohol could be purchased and taken away, which may suggest a local perception that the number of off-licences should be scrutinized – meanwhile the indication that nearly a third of respondents would be happy to see more restaurants or cafes suggests that on-licences (at least of that sort) should not be included in this consideration.

The Board previously suggested that the question of granting new licences in high deprivation areas be resolved through the discretion and expertise of the District Licensing Committee, based on the local information supplied through the application process.

The [Early Engagement Analysis Report](#) (March 2025) notes that "A large proportion of respondents agreed that Council should implement a temporary freeze on new licences in high deprivation areas (61%), compared with 25% of respondents who disagreed... Respondents most commonly thought that the freeze should apply to new liquor stores (68%), followed by small grocery stores (52%) and specialty stores (47%)" (pg. 32).

The Board is broadly inclined to accept that the temporary freeze proposal aligns with community views, and supports the well-informed positions of the statutory consultees, the Police, Te Whatu Ora, and the Council's Alcohol Licensing Team. However, the Board would prefer to better understand the effectiveness of this policy in reducing alcohol-related harm. Alcohol can cause harm across society, and a concern could be that this policy might slowly see bottle stores closer together in greater competition with each other near the boundaries of high deprivation areas, which may tend to lower alcohol prices and so increase alcohol-related harm there.

A provision within this policy endorsing or enabling the District Licensing Committee to use tools and discretion to avoid such unintended consequences may be worth considering, along with ensuring adequate data is obtained through the course of the temporary freeze to establish whether it is effective enough to justify it being extended in the future.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)
[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

The Board notes that the [Local Alcohol Policy – Issues and Options Report](#) (January 2025) indicates that this option "responds to community preferences that licensed premises are not located close to certain sensitive sites such as schools", and "[t]he rationale for the inclusion of each community facility varies".

The Board notes that 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%)", and two thirds of respondents "think there should also be restrictions near medical/rehabilitation facilities and hospitals".

The Board supports this option as it would like to see alcohol outlets kept away from the sectors of its community most vulnerable to the influence and presence of such outlets.

Which part of this proposal would you change?

Required question

The Board notes that when staff have presented to the Board, the indication is that the majority of respondents from the Board area would like to see bottle stores, pubs, bars, and night clubs be restricted regarding how close they can be to community facilities, with respondents suggesting these areas should include secondary schools/colleges, early childhood centres, primary schools, medical/rehabilitation facilities and hospitals, parks, playgrounds and sports facilities.

The Board suggests the Council carefully considers what further feedback it receives on this policy from the community, and the statutory consultees, i.e. the Police, Te Whatu Ora, and the Council's Alcohol Licensing Team. This may offer further insight on community and expert views related to including pubs, bars and nightclubs in the proximity restriction, at least for addiction treatment/rehabilitation centres, if not for schools also.

It is understood the Council excluded pubs, bars and nightclubs from this proposed policy because it did not wish to give rise to a sinking lid on these types of premises, even where the policy only applies close to sensitive sites. However, the policy does not affect existing alcohol licenses being renewed nor the on-sale of existing premises with the purchasers able to apply for an alcohol licence. **I**

Additionally, it appears to run contrary to the early community feedback to exclude pubs, bars and nightclubs from this policy and

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permit an increase in new premises of this type being set up close to sensitive sites. It would be uncommon for well-run premises to not be on-sold as such, and so unlikely that the policy would in fact reduce the existing number of these premises.

In rare cases where a premises cannot be viably on-sold for continued operation, this may anyway indicate an excess of such venues in the area. Allowing the establishment of new premises in such contexts risks encouraging price-based competition — a recognised driver of alcohol-related harm.

However, if the Council is unwilling to accept any possibility of a reduction in pubs, bars and nightclubs near these sensitive sites as an unintended consequence of the policy, it does not need to simply abandon the community interest in protecting sensitive sites from an increasing presence of nearby pubs, bars and nightclubs. The option of capping (instead of restricting) new pubs, bars and nightclubs setting up close to addiction centres and schools, would prevent an increase in the number of these premises near these sensitive sites, but also avoid the policy operating as a sinking lid on these premises in those areas.

The [Early Engagement Analysis Report](#) (March 2025) notes that “Bottle stores received high support for being restricted near sensitive sites, with 93% to 96% of respondents agreeing for early learning centres, primary schools, secondary schools, and addiction and rehabilitation facilities.

On-licensed venues like pubs and taverns also had strong support for restrictions, with 78% to 84% of respondents agreeing for these same sites” (pg. 40).

The Board suggests that any decision relating to a cap or restriction should also be partnered by the ability for the District Licensing Committee to reduce the visibility of alcohol advertising in areas where there are children and or any other ‘vulnerable’ members of the public — e.g. routes to health and addiction centres. Advertising watersheds on television for example are there for a reason and this should be considered in the community on buildings, shops, etc.

Excessive alcohol-related signage and bright colours on licenced premises expose all members of the community to an unacceptable level of advertising for alcohol, and thus to potential alcohol-related harm. The LAP should include restrictions on signage to address this.

Restricting new bottle stores’ proximity to sensitive community facilities

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?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let’s Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

The Board has the same comments here as to the previous question, supporting this option as it would like to see alcohol outlets kept away from the sectors of its community potentially most vulnerable to their influence and presence.

Which part of this proposal would you change?

Required question

The Board has the same comments here as to the previous question.

Restricting new bottle stores’ proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let’s Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

I’m not sure

Please tell us why you’re not sure:

The Board does not represent this area and supports the Council giving appropriate weight to local views.

General feedback

Do you have any other comments?

The Board sees an opportunity to further reduce alcohol-related harm by reducing the latest closing times for on-licensed premises in suburban areas, outside the central city, to 1am. The Board noted the rationale in the [Local Alcohol Policy – Issues and Options Report](#) (January 2025) that “[t]here is some research showing that reducing trading hours for on-licensed premises

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can be an effective way of reducing alcohol-related harm.”

The Board would be particularly supportive of this option if the Police found this made their ability to manage and enforce such a rule, easier, in it relating to their ability to geographically manage their resources to best ensure the safety of the community. It may also be considered that central city noise is more likely to be managed by area-specific regulatory mechanisms going forward, which would be more challenging to extend to suburban areas, making this a relevant mitigation in that respect also.

The Board supports a consistent closing time across different on-licences types in ‘suburban areas’. The Board suggests though that there must be further clarification of what is defined as the “central city”; querying whether the definition needs to change from being “within the four avenues” as some understand it to be.

With a significant increase in the number of homes in the CBD and Central City (within the four avenues) more consideration needs to be given to these residential areas. The Board notes that the term ‘suburban areas’ is undefined and without clarity of that and what is the Central City, applying rules and making clear what is required, where and why, may be more challenging.

Generally, the Board considers that any LAP needs to be also developed in close partnership with the enforcement bodies – the Police and Licensing Inspectorate.

As mentioned previously and the Board feels strongly enough to reiterate it here, excessive alcohol-related signage and bright colours on licenced premises expose all members of the community to a potentially unacceptable level of advertising for alcohol, and thus to alcohol-related harm. The LAP should include restrictions on signage to address this.

Noting the below extract (in italics) from the [ActionPoint website](https://www.actionpoint.org.nz)

[\[https://www.actionpoint.org.nz/local_alcohol_policy_case_for_change\]](https://www.actionpoint.org.nz/local_alcohol_policy_case_for_change), the Board suggests the Council also explores either option 1 or 2 below:

Option 1: The reduction in maximum trading hours for the sale of alcohol is limited to after a time school children would have normally completed their journeys past them on the way to school, and also require them to close for a period when school children would normally be completing their journey past them on the way home. This policy might at least be applied to premises near schools, though as noted below early morning alcohol sales have also been a concern of social service providers in respect its negative impacts on people dealing with addiction.

Option 2: Acknowledging that the Council may not accept what is suggested in Option 1 for protecting youth, and others vulnerable to the negative impacts of the presence of alcohol premises, i.e. further limiting opening hours in the morning and afternoon, a more palatable alternative for this purpose may be a form of restriction on alcohol-related signage and bright colours on off-licensed premises close to sensitive sites and high deprivation areas. Endorsing the District Licensing Committee to address intrusive promotions of alcohol and premises to the sectors of society most vulnerable to them would be a reasonable step to address the negative impacts outlined here:

Opening hours (on-licences and off-licences)

Having later opening hours can reduce the exposure of alcohol (and its advertising) to children on their journey from home to school. This suggests that it would be ideal if all off-licences remained closed until after 9am or 10am, once children have made their way to school. It would also be useful for them to close when children leave school (i.e. between 3 to 4pm).

Research has documented the association between exposure to alcohol advertising around schools and increased intentions to use alcohol among very young adolescents [6]. Exposure to in-store displays of alcohol have also been found to increase the likelihood of drinking [7].

Social service providers in New Zealand have been concerned about the negative impact of early opening hours on persons with alcohol dependence. A later opening hour may further assist those who have made a decision to reduce their alcohol intake and support those in recovery.

Similarly, where the Council has expressed concern about unintended consequences around the prospect of not allowing supermarkets to sell alcohol in high deprivation areas, an alternative emphasis could be placed on reducing the visibility of in-store displays of alcohol, given that supermarkets are unavoidable for everyone, including youth and those dealing with addiction.

Restricting enticing promotional practices, such as reduced price singles being offered for sale and visible from outside the alcohol section, along with other alcohol specials, could be explicitly supported so the District Licensing Committee feel endorsed in imposing conditions to address price and promotion contributing to alcohol-related harm. As noted on the [ActionPoint website \[https://www.actionpoint.org.nz/price_promotion\]](https://www.actionpoint.org.nz/price_promotion):

Alcohol companies and licensed premises use a vast number of promotional strategies to get customers to buy their products.

The use of discounts has a huge effect on alcohol purchases. This especially occurs at off-licences (supermarkets, bottle stores, etc) but also in bars and restaurants (‘happy hours’, etc).

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

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(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 15/05/2025

First Name: (required) David Last Name: (required) Hawke

Please provide the organisation name:
(required)

The Halswell Residents Association Incorporated

Your role and the number of people your
organisation represents: (required)

Treasurer; membership of 20

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:
See attached

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)?

You can view high deprivation maps [here](#).

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:
See attached

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

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Please tell us why you support this proposal:
See attached

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:
See attached

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:
See attached

General feedback

Do you have any other comments?
See attached

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
HRA LAP submission May 2025 



Submission: Draft Local Alcohol Policy (Christchurch City Council)

Date: 13 May 2025

Standing: The Halswell Residents Association Incorporated is a registered charity that advocates for the interests of people in Halswell. Activities are largely carried out by a Committee of seven members, and we hold monthly meetings open to the public. The Association Chairperson is John Bennett; Adele Geradts is the Secretary; David Hawke is the Treasurer. The Association can be contacted by email at secretary.HRA@gmail.com

Introductory comments:

Our experience in dealing with liquor licence applications began in earnest when we opposed a suburban bottle store in Halswell in 2017-2019, when there was no LAP. The amount of time we committed to this process was phenomenal; an LAP would have helped us enormously (and NZ Police, and the Medical Officer of Health). After this experience, we worked with our local electorate MPs (both Labour and National) to advance what eventually became the Sale and Supply of Alcohol (Community Participation) Amendment Act 2023. It's worth pointing out that the MPs we dealt with were very supportive, regardless of their party affiliation.

With this background, we have a strong evidence-based research perspective and it is good to see this reflected in the proposed LAP. One of our committee members reports that he works with a youngster who has foetal alcohol spectrum disorder. His future does not look good, but we remember clearly the applicant in the bottle store process complaining about the "Fun Police". As this youngster struggles with issues that are not of his making, the person selling the alcohol is nowhere to be seen.

Notwithstanding our opposition to off-licences, we have been supportive of on-licence applications because on-licences provide a supervised environment. An example of an on-licence application we supported was Craythornes Hotel, probably around 2015. Similarly, we did not oppose the application for the Long Knight in Longhurst around the same time. Even though the Long Knight has a bottle store attached, the vibe is very much a bar rather than a stand-alone bottle store.

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

- a. We strongly support this measure. From what we can figure, allowable opening hours across the city extend to 11pm. The issue here is that people will often be tanked up with alcohol already, eg by drinking in a bar or restaurant. Having bottle stores open for business allows people to keep drinking in an unsupervised way. It is this absence of supervision that facilitates domestic violence, intentional damage, littering and other antisocial behaviour.
- b. Interestingly, the bottle store we opposed is now closing at either 8pm (Sunday-Tuesday) or 9pm despite having its allowable closing time increased to 11pm in 2021. However, our area is not “high deprivation” and we note that actual closing times in high deprivation areas are often right to 11pm.

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

- a. We strongly support this measure. There is a reason that bottle stores have their highest density in high deprivation areas – people in high deprivation areas are more likely to be living challenged lives and in such circumstances will more likely turn to alcohol.
- b. In the Halswell area, there is outlined in the proposed LAP a portion of a high deprivation area south of Hendersons Road. This area is part of Rowley, and we strongly support the inclusion of this area.
 - i. There are two new supermarkets planned or already consented for this site, and the freeze on new off-licences absolutely needs to apply to them and any of their subsidiaries such as Henry’s or Liquorland.
 - ii. We can imagine that the supermarkets concerned do not see it this way, but we fervently hope that you stand your ground. Giving these supermarkets off licences would dramatically increase the availability of alcohol in the Rowley area.

Policy 3: Restrict new bottle stores near sensitive sites

- a. We strongly support the restriction on new bottle stores opening within 200 m of an early childhood centre, primary or secondary school or an addiction treatment/rehabilitation site.
 - i. The addiction treatment/rehabilitation site should be self-explanatory.
 - ii. For early childhood centres and schools, the issue here is that parents or caregivers dropping off or picking up their youngster from school etc. will typically park on the road close by. This parking can be several hundred meters away, so the 200 m proposed is the absolute minimum. An alcohol-tempted parent or caregiver can then be forced to walk past the purveyor of their addiction.
- b. On top of this is the situation of high school students, some of whom will be of legal age for alcohol purchase. Minimising the opportunity for alcohol purchase of such vulnerable young people is really important, especially when they are in the company of their peers.

- i. Here is an example from one of our Committee: *“My middle two boys were June and July babies who turned 18 in their last year of high school. They both started drinking at parties and were asked to bring beers. Which, as social kids, they did. As a parent, you want to teach responsible drinking, but it can be very hard when peer pressure is a huge factor in a teen's development.”*
- c. An absolutely essential extra point here is that the 200 m must apply to all entrances to the school or early childhood centre, and not just the official address.
 - i. For example, Oaklands School in Halswell can be accessed off Jarrow Place and Cobra Street as well as the official street address in Cunningham Place. This is a common situation across the city.
- d. We would prefer that a “sinking lid” apply within the 200 m radius, but accept that this is an argument for another day.
- e. Being outside Halswell, we have no particular opinion on proximity within the four avenues (of Bealey, Moorhouse, Fitzgerald and Deans). Similarly, we have no particular opinion on the Banks Peninsula question.

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Jennifer Last Name: (required) Lamm

Please provide the organisation name:
(required)

Alcohol Healthwatch

Your role and the number of people your
organisation represents: (required)

National agency

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Refer to written submission

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)?

You can view high deprivation maps [here](#).

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Refer to written submission

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

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Please tell us why you support this proposal:
Refer to written submission

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:
Refer to written submission

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:
Refer to written submission

General feedback

Do you have any other comments?

Refer to written submission

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Alcohol Healthwatch Christchurch LAP submission 18 May 2025 sent 

Item 4

Attachment A



**Submission on the Christchurch City Council
Draft Local Alcohol Policy**

18 May 2025

Kia ora

Thank you for the opportunity to provide feedback on the Christchurch City Council Draft Local Alcohol Policy.

We would like the opportunity to speak (virtually) to our submission.

If you have any questions on the comments we have included in our submission, please contact:

Jennifer Lamm
Alcohol Healthwatch
T: 021 777 548
E: jennifer@ahw.org.nz

About Alcohol Healthwatch

Alcohol Healthwatch is an independent national charity working to reduce alcohol-related harm and inequities. We provide a range of regional and national health promotion services such as providing evidence-based information and advice on policy and planning matters; supporting community action projects, and coordinating networks to address alcohol-related harm such as the Cross-council Local Alcohol Policy Network.

General Comments

1. Alcohol Healthwatch commends the Council on commencing the development of a Local Alcohol Policy (LAP), and we wish to acknowledge the efforts of councillors and officers in conducting this review on behalf of the Christchurch communities, and the early engagement with key agents and stakeholders and the general public to inform this work¹.
2. This submission reiterates our feedback in March 2025, and we are supportive of the policies in the draft LAP that address the location and trading hours of off-licences and the freeze on the issuing of off-licences in areas with high-deprivation communities.

However, we strongly recommend that the LAP cover all licence types: off-licences (including supermarkets and grocery stores), on-licences, club licences and special licences. We also recommend that the full range of policies that are set out in section 77(1) of the Sale and Supply of Alcohol Act 2012 be included in the LAP, namely policies on:

- Location of premises in “broad areas” - section 77(1)(a)
- Proximity to other premises – section 77(1)(b)
- Discretionary conditions - section 77(1)(f)
- One-way door policy - section 77(1)(g).

Alcohol-related harm

3. Of all drugs available in our society, alcohol is the most harmful². Alcohol is a leading cause of preventable death, injury³ and ill health in Aotearoa New Zealand and a significant contributor to the social and health inequities experienced by Māori⁴, Pacific peoples and other impacted groups.
4. Alcohol is a component cause for more than 200 disease and injury conditions⁵, and is the leading behavioural risk factor for death and disability adjusted life years lost among New Zealanders aged 15 to 49 years⁶. This is particularly the case in Christchurch where “among the major cities, Christchurch City had the highest average mortality rate for conditions wholly attributable to alcohol”⁷.
5. The cost of alcohol-related harm in Aotearoa has been estimated at over \$9.1 billion annually⁸, and over \$62.8 million per annum in Canterbury alone^{9 10}. The harms are far-reaching and deeply felt by many families/whanau and communities.
6. The Council’s Local Alcohol Policy Research Report¹¹, Issues and Options Report¹² and feedback from early engagement¹³ clearly identifies the issues and confirms that alcohol-related harm is occurring in the City, particularly in areas of high deprivation.

Local Alcohol Policies

7. We strongly believe that a LAP should not be considered in isolation, but should be seen as part of a cohesive package to reduce alcohol-related harm that includes alcohol bans¹⁴ alcohol licensing fees¹⁵, the Alcohol Harm Partnership¹⁶ and other alcohol-related policies as well as a LAP.
8. A LAP which has the effect of reducing the overall availability of alcohol has significant potential to further minimise alcohol-related harm and improve community well-being.

Measures that reduce accessibility and availability of alcohol have particular benefits for those who experience significant inequities in harm. To date, alcohol outlets in Aotearoa New Zealand, including Christchurch, have been inequitably distributed to the most deprived neighbourhoods and the unequal harms from this can be addressed¹⁷ through a LAP.

9. By incorporating evidence-based measures to address both the physical (location) and temporal (operating hours) availability of alcohol, a LAP can support other harm reduction interventions in the local area and assist in sending a strong signal to communities regarding the harms associated with alcohol use.

Specific comments

10. Alcohol Healthwatch supports provisions in the LAP that are aligned to the object of the Sale and Supply of Alcohol Act 2012 (the Act), that reflect the needs of the community and are supported by evidence for reducing alcohol-related harm¹⁸.
11. The review of the LAP is timely and provides an opportunity for the LAP to reflect:
 - The Sale and Supply of Alcohol (Community Participation) Amendment Act 2023¹⁹ that made it easier for communities to have a say in alcohol regulation and simplified the process to develop a LAP by removing the ability to appeal provisional LAPs²⁰;
 - The Supreme Court decision on the Auckland Council Provisional LAP²¹ that affirmed that “a precautionary approach is open and that, in any event, a restriction may be justified on the basis of there being a reasonable likelihood that it will reduce alcohol-related harm”,²² and that “policies that are implemented by a local alcohol policy can be based on, or at least influenced by, community preference”,²³
 - The changing environment and emerging issues in Christchurch;
 - The desirability of ensuring greater consistency and synergy with LAPs in the region²⁴ and across Aotearoa New Zealand; and
 - The growing acceptance that a LAP can provide greater certainty and clarity for the public, licensing bodies and regulatory agencies as well as licensees.

Policies under Section 77(1) of the Act

Location of Premises

Section 77(1)(a) – Broad Areas

12. Through a LAP, territorial authorities may restrict licensed premises to a particular “broad area”, such as a commercial or industrial zone, but must first have regard to

the district plan and its objectives and policies (section 78(2)(a) of the Act). We believe the review presents an opportunity to include a policy on “broad areas” with locations clearly identified where licensed premises can be established.²⁵ A clearly articulated “broad areas” policy can also complement and support other policies, including the policy on the issuing of further off-licences in areas of high deprivation in clause 6 of the LAP (section 77(1)(d)) and the restriction on bottle shops locating in close proximity to a “sensitive site” in clause 7 of the LAP (section 77(1)(c)).

Section 77(1)(b) – Proximity to Other Premises

13. We recommend the inclusion of a policy preventing new licensed premises from being located in close proximity to other licensed premises. Setting a distance rule would address the harm associated with the clustering of premises and could see, for example, off-licensed premises prevented from being established within, say, 50²⁶ or 100²⁷ metres of an existing off-licensed premises.

Section 77(1)(c) - Proximity to Sensitive Sites

14. There is a need to generally protect vulnerable users of sensitive sites from exposure to off-licence, on-licence and club licence premises and the associated negative amenity effects. Protecting vulnerable populations and users of sensitive sites can also assist to address their disproportionate and inequitable exposure to alcohol and experience of alcohol harms, particularly for young people.²⁸
15. Considering the research and community concerns²⁹, we are pleased that the draft LAP, like most council LAPs, has a sensitive sites policy with a minimum distance³⁰ between a bottle store and a site. This may prevent new bottle stores locating in close proximity to primary and secondary education facilities and addiction treatment/rehabilitation facilities. However, we recommend that further consideration be given to expanding the range of licensed premises subject to this policy and include other off-licences premises such as supermarkets and grocery stores, and on-licences and club licences. We further recommend that the range of sensitive sites be expanded to include other facilities such as early childhood centres³¹, youth centres, places of worship, marae and Council-owned or managed community facilities that are used by the public for recreation, sport or cultural purposes (eg pools, libraries, museums, community halls).

Section 77(1)(d) – Issuing of Further Licences

16. As in other areas in Aotearoa, alcohol outlets in Christchurch are over-concentrated in the most deprived areas³² and this impacts Māori and Pacific peoples more than other

demographic groups^{33 34 35}. We believe that a policy on the issuing of further licences would reflect community concerns³⁶ and also align with research on the relationship between the proliferation of licenced premises and accessibility to alcohol and alcohol-related harm.^{37, 38, 39} This policy can halt or reduce the existing numbers of outlets, particularly in areas where licensed premises have reached saturation levels or are located in high socio-deprivation areas⁴⁰. We therefore strongly support the policy that would prevent new off-licences from being issued in those areas in Appendix 1 of the LAP, or outside of these areas if the District Licensing Committee (DLC) or the Alcohol Regulatory and Licensing Authority (ARLA) consider that the granting of a licence may contribute to the further concentration of off-licensed premises servicing high-deprivation areas.

Maximum Trading Hours

Section 77(1)(e) – Trading Hours

17. Reducing trading hours is a key strategy for reducing alcohol-related harms⁴¹. Studies have shown that hazardous drinking increases with longer hours and greater availability^{42,43}. This reality is reflected in the current trend for councils to reduce trading hours in their LAPs, particularly for off-licences. As the vast majority of alcohol is purchased from off-licences (over 80%) and often cheaply, we strongly support the proposed off-licence closing hour of 9 pm and further recommend a later opening hour of 9 am. These trading hours reflect the current trend for reduced trading hours for off-licences in LAPs (including bottle stores, supermarkets, grocery stores), particularly since the Supreme Court decision on Auckland Council's Provisional LAP. Reduced trading hours help reduce the opportunity of hazardous drinking and "pre loading", "side-loading" and "post loading" and consequently lessen the incidence of other harms (assault, unintentional injury, drink driving) associated with extended trading hours⁴⁴. A recent study has also estimated that implementing stricter limits on off-licence trading hours and density could decrease overall alcohol consumption in Aotearoa New Zealand by 17.9% resulting in a gain of 450,000 health-adjusted life years (HALYs) over the lifetime of the current population⁴⁵.
18. Unlike most other LAPs, trading hours for on-licences, club licences and special licences have not been included in the Christchurch LAP. Setting trading hours in a LAP provides guidance to a DLC and can address community concerns, as longer trading hours are associated with an increase in hazardous drinking. Hours that reflect community

preferences can help reduce the incidence of serious crime that often occurs with later closing times due to people's higher levels of intoxication⁴⁶.

Discretionary Conditions

Section 77(1)(f) – Discretionary Conditions

19. We strongly recommend that discretionary conditions be included in the LAP, such as those that are aligned to Crime Prevention through Environmental Design (CPTED) principles, host responsibility and the management of the premises, and preventing special licences for events focused on children and young people under 18 years to limit their exposure to alcohol.
20. Specifically, we recommend the following discretionary conditions for off-licences:
 - (a) *restrictions on single sales*, as such sales generally make alcohol affordable and are often linked to hazardous drinking by vulnerable people; and
 - (b) *limitations on alcohol-related exterior signage or advertising*, as this would reduce the exposure of children to alcohol-related advertising and promotions.⁴⁷ Exposure to alcohol advertising is a known risk factor for alcohol-related harm, contributing to both the amount consumed and frequency of alcohol use. It works on a number of levels including normalising, glamorising, and embedding alcohol consumption into day-to-day settings. Children and young people are at a greater risk from harm as their developing cognitive skills increase their susceptibility to the influence of advertising. The University of Otago *Kids'Cam* research found that New Zealand children aged 11-13 years were exposed to alcohol marketing on average 4.5 times per day. Māori and Pacific children had levels of exposure five and three times greater than European children, respectively. Research undertaken by Alcohol Healthwatch in Tāmaki Makaurau Auckland echoes the Otago University and other studies⁴⁸, and found that 56% of schools had at least one alcohol advertisement within 500 metres; 75% of alcohol advertisements were from nearby licensed premises; 63% of alcohol advertisements were near low decile schools, 66% of schools had one alcohol advertisement in the radius, with the average number of advertisements near schools was two; and 78% of the alcohol advertisements were within 400 metres of the schools.⁴⁹ A ban on external advertising can also support CPTED and other measures by prohibiting external signage that obscures the view into/out of the premises.
 - (c) *restrictions on Buy Now, Pay Later (BNPL)*, as these schemes are considered an inappropriate method of payment and subvert established mechanisms to minimise

harm to public health from alcohol by enticing the consumer with a much lower upfront price. The research shows that the use of BNPL services to purchase alcohol increases its perceived affordability, which can lead to greater consumption and related harms. The availability of alcohol at low alcohol prices facilitates moderate drinkers becoming heavy drinkers, and heavy drinkers transitioning to dependent drinkers. The harm associated with economic accessibility and perceived affordability of alcohol is exacerbated where alcohol is readily available in store (eg outlets in close proximity⁵⁰, long trading hours) and on-line (eg rapid delivery). Young adults are among the heaviest drinkers⁵¹, they are currently the main consumers of BNPL, are also likely to use rapid delivery for their purchases (often without ID checks), and this makes them particularly vulnerable;

- (d) *requirement for mandatory age checks on purchase and delivery*, particularly with the increasing availability of remote sales/delivery. For example, research conducted by Alcohol Healthwatch in Tāmaki Makaurau-Auckland showed that in 73% of alcohol orders did not request age verification on delivery, 49% of alcohol orders were left unattended (contactless) at the door, and 87.5% of delivery companies broke their own restricted items policy. Alcohol delivered without an ID check may make it easier for under 18 year olds to access alcohol and increases the chances of hazardous drinking;⁵²
- (e) *restrictions on the marketing and promotion of non-alcoholic products* that pose a high risk of alcohol-related harm, such as drinking games and risky items that encourage dangerous drinking (eg beer pong cups);
- (f) *restricting end of aisle sales of alcohol products*, as this is been shown to increase sales by as much as 23 to 43 percent and would have a significant impact on alcohol consumption;⁵³ and
- (g) *requirement to have FASD (Fetal Alcohol Spectrum Disorder) warning signage* within the alcohol area in supermarkets and grocery stores and at point of sale at bottle stores.⁵⁴

One-way door restrictions

Section 77(1)(g) – One-way Door Policy

21. As noted above, we recommend the inclusion of policies for on-licences, club-licences, and special licences. We would therefore also recommend a mandatory one-way door restriction for certain on-licences premises such as taverns, bars, clubs. One-way door restrictions would help prevent a large number of people coming out of licensed

premises at the same time (as would be the case with a universal maximum closing time) and the potential for intoxicated patrons migrating between venues or interacting with others with an increased likelihood of disorder and crime. These conditions also have the potential to reduce the burden on Police, ambulance and hospital services and can have a positive benefit for not only the patrons of premises but the community generally.

Conclusion

22. Alcohol Healthwatch supports the policies in the draft LAP that address alcohol-related harm, namely the policy preventing the issuing of new off-licences in identified areas, 9pm closing time for off-licences premises and the distance requirement for new bottle stores in proximity to sensitive sites. However, we recommend that the full range of policies be included in the LAP that cover all licence types, as a more comprehensive LAP could reflect community preferences and meet the object of the Sale and Supply of Alcohol Act 2012 - and reduce the significant burden placed on communities from alcohol-related harm.

References

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- 2 Crossin R, Cleland L, Wilkins C, Rychert M, Adamson S, Potiki T, et al. The New Zealand drug harms ranking study: A multi-criteria decision analysis. *J Psychopharmacol* (Oxf). 2023 Jun 23; 02698811231182012. Nutt DJ, King LA, Phillips LD. Drug harms in the UK: A multicriteria decision.
- 3 Alcohol is a significant contributor to interpersonal violence, self-harm (eg suicides), mental health disorders (eg depression), traffic injuries and other harms. For example, Christchurch, 35% of Emergency Department reports of violence and aggression are related to alcohol., Ds Richardson, S. K., Grainger, P. C., & Joyce, L. R. (2022). Challenging the culture of emergency department violence and aggression. *NZ Med J*, 135(1554), 9-19.
- 4 Chambers, Tim; Mizdrak, Anja; Jones, Amanda C.; Davies, Anna; Sherk, Adam (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Health New Zealand. Report. <https://doi.org/10.60967/healthnz.27048892.v1>.
- 5 Rehm J, Baliunas D, Borges GL, et al. The relation between different dimensions of alcohol consumption and burden of disease: an overview. *Addiction* 2010; **105**: 817–43.
- 6 Institute for Health Metrics and Evaluation (IHME). GBD Compare Data Visualization 2019, New Zealand. Seattle: WA: University of Washington, 2022. <https://www.healthdata.org/data-visualization/gbd-compare>
- 7 Christchurch City Council. Local Alcohol Policy Research Report. January 2025. Page 107. https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Policies/LAP2024_ResearchReport_January2025.pdf.
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- 10 Environmental Health Intelligence New Zealand. Alcohol-related harm indicators: <https://ehinz.ac.nz/indicators/alcohol-related-harm/about-alcohol-related-harm/#alcohol-related-harm-indicators>
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 - 19 Sale and Supply of Alcohol (Community Participation) Amendment Act 2023, No. 60: <https://www.legislation.govt.nz/act/public/2023/0060/latest/whole.html>.
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 - 24 See Christchurch City Council. Local Alcohol Policy Research Report for a survey of New Zealand territorial authority LAPs, including those in the Canterbury region:
 - Ashburton District – in force 14 March 2024. www.ashburtondc.govt.nz/_data/assets/pdf_file/0013/4810/Local-Alcohol-Policy-2023-final.pdf
 - Hurunui District – in force 1 March 2024. https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Support_Services/Policies/Alcohol/LAP%202023%20valid%20from%20March%201%202024
 - Kaikōura District – in force 5 April 2020. <https://www.kaikoura.govt.nz/repository/libraries/id:2i17fvyhr17q9scmy0d8/hierarchy/Rules%2C%20Regulations%20and%20Licences/Alcohol%20Licensing/Final-Local-Alcohol-Policy-2020-signed.pdf>
 - Mackenzie District – in force 28 February 2024. https://www.mackenzie.govt.nz/_data/assets/pdf_file/0006/868074/Local-Alcohol-Policy-adopted-February-2024.pdf
 - Selwyn District – reviewed 2025. <https://www.selwyn.govt.nz/services/licensing/alcohol/local-alcohol-policy>
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- 200 metres - Rotorua Lakes District Council Local Alcohol Policy 2019 (and 2025 draft)
 - 150 metres - Gisborne District Council. Local Alcohol Policy 2024; Selwyn District Council 2025 (draft);
 - 100 metres - Wairarapa Local Alcohol Policy 2025 (Carterton, Masterton, South Wairarapa District Councils); Stratford District Council and New Plymouth District Council Joint Local Alcohol Policy 2017; Waikato District Council Local Alcohol Policy (under appeal) 2017; Waipa District Council Local Alcohol Policy 2025; Eastern Bay of Plenty Local Alcohol Policy (under appeal) for Whakatāne, Kawerau and Ōpōtiki District Councils; Whanganui District Council Local Alcohol Policy 2019.
- We note the similar requirement for vape retailers to be 300 metres of a school or marae and 100 metres from an ECE. See: Ministry of Health-Manatū Hauora, 2025. Location requirements for specialist vape retailers. <https://www.health.govt.nz/regulation-legislation/vaping-herbal-smoking-and-smokeless-tobacco/selling-vaping-or-other-notifiable-products/location-requirements-for-specialist-vape-retailers>.
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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Sam Last Name: (required) MacKinnon

Please provide the organisation name:
(required)

Hospitality New Zealand

Your role and the number of people your
organisation represents: (required)

Head of Comms and Advocacy - HNZ represents
over 350 members across Canterbury and over
2,500 members nationally

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

In a broader licensing sense, it is important that license holders have certainty. We are pleased with the assurances provided regarding the freeze on new off-licenses and location restrictions that existing outlets will still be able to renew their licence and if they changed ownership, the new owner can still obtain a new licence.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

359

Yes

Please tell us why you support this proposal:

In a broader licensing sense, it is important that license holders have certainty. We are pleased with the assurances provided regarding the freeze on new off-licenses and location restrictions that existing outlets will still be able to renew their licence and if they changed ownership, the new owner can still obtain a new licence.

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

In a broader licensing sense, it is important that license holders have certainty. We are pleased with the assurances provided regarding the freeze on new off-licenses and location restrictions that existing outlets will still be able to renew their licence and if they changed ownership, the new owner can still obtain a new licence.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

In a broader licensing sense, it is important that license holders have certainty. We are pleased with the assurances provided regarding the freeze on new off-licenses and location restrictions that existing outlets will still be able to renew their licence and if they changed ownership, the new owner can still obtain a new licence.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Hospitality NZ Letter on CCC Local Alcohol Policy



18 May 2025

Christchurch City Council
Via email: letstalk@ccc.govt.nz

RE: DRAFT LOCAL ALCOHOL POLICY

Tenā koe,

We are writing to you on Christchurch City Council's draft Local Alcohol Policy (LAP).

As the representative voice of the hospitality and accommodation sector, Hospitality New Zealand (Hospitality NZ) takes immense pride in advocating for the interests of over 2,500 diverse businesses, including cafés, restaurants, bars, clubs, nightclubs, commercial accommodation, country hotels, and off-licences. With a history spanning over 120 years, we have been steadfast in our commitment to fostering a thriving and responsible sector.

Hospitality is important to local communities. We offer vibrant and diverse options for food and beverage, enhancing any community's quality of life and visitor experience. We provide safe and responsible accommodation options that contribute as rate-paying businesses to the local economy. We support job creation, development opportunities and career pathways for young people joining the workforce. And we enable entrepreneurship through small business ownership in local communities.

We have always valued strong relationships with local government entities as key partners. As with Central Government, the industry by and large looks to local government to set the right parameters to inspire business confidence which, in turn, attracts skills and investment to their region.

Ōtautahi Christchurch's hospitality sector plays a key role in the city's ongoing growth and revitalisation. As the city rebuilds and works to attract more residents, visitors, events, and businesses, it is vital that the LAP is carefully considered to ensure it gets the settings right to support both public safety and a thriving night-time economy as part of the city's offering for locals and visitors alike.

Hospitality NZ supports the LAP as proposed, as it has acknowledged the role on-premise hospitality plays in supporting city vibrancy, alongside the Sale and Supply of Alcohol Act's harm-minimisation objectives and the District Licensing Committee's ability to manage licensing concerns on a case-by-case basis.

In a broader licensing sense, it is important that license holders have certainty. We are pleased with the assurances provided regarding the freeze on new off-licenses and location restrictions that existing outlets will still be able to renew their licence and if they changed ownership, the new owner can still obtain a new licence.

Thank you for the opportunity to submit on the draft LAP. Hospitality NZ will continue to advocate for policies that support responsible venue operators while contributing to the long-

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term success of the city's hospitality sector – we welcome the opportunity to work closer with Christchurch City Council to support a thriving hospitality environment.

Ngā mihi nui,

Jeremy Stevens
Canterbury Branch President
Hospitality New Zealand

Nikki Rogers
Regional Manager – Canterbury
Hospitality New Zealand

Sam MacKinnon
Head of Communications and Advocacy
Hospitality New Zealand

Item 4

Attachment A

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 15/05/2025

First Name: (required) William Last Name: (required) Jones

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

No

Please tell us why you don't support this proposal:

It makes no sense, leaving the club to see your mate then being locked out, idiotic. Our city used to be alive till 6am pre earthquakes. This is a wrong move for our cbd and future for Christchurch to have any chance at a nightlife. I am a level 6 audio engineering student and this would severely impact my decisions on staying local and remaining here. I hope you take these words strongly, ❤️❤️

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

No

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

No

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

347

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

No

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

No

General feedback

Do you have any other comments?

Do not do anything to harm the re development of one of New Zealand's best spots for music and nightlife, bring it back to how it was pre quakes

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 17/04/2025

First Name: (required) Marco Last Name: (required) Duff

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Having been involved in a number of community organisations and attending on a regular basis the Hornby Community Workers Luncheon meeting it is quite disturbing and alarming how much harm is caused by alcohol in our community but especially after 9pm. So many in our community would not be aware of how much harm is done by alcohol in our community in our homes.

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Finally something positive for our area and welcomed. Congratulations to the Councillors who have supported this so far in the process, it shows you have real care for those communities.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

No

Please tell us why you don't support this proposal:

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I just cant see this having huge impact, my days at school were not influenced by wanting to go to the local liquor store but we were served on a Cook Strait Ferry in school uniform

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

I hope it would work but I am not sure but hopefully it may keep the areas free of bottles etc from the stores.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Item 4

Attachment A

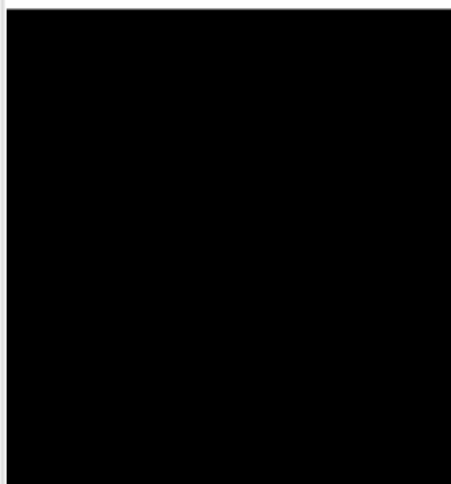
Draft Local Alcohol Policy 2025 from Hawker, Wayne

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 17/04/2025

First Name: (required) Wayne Last Name: (required) Hawker



Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

While I do support the closing of off license operators from selling alcohol after 9pm, I do believe we need to take it a step further . There is what appears as a default setting that Off license holders have at currently a 7am -- 11pm operating hours this proposal only addresses part of the issue

Which part of this proposal would you change?

Required question

I believe that council need to reset the default opening hours to be 9am --- 9pm. I am sure you will get an argument from off license holder's they do not generally open at 7 am anyway apart from supermarkets so apart from supermarkets they should not have an issue with it but as it is already shut off in supermarkets from 9pm anyway, so there is no real extra cost to remove the barriers whether it be 7am or 9am.

The advantage of leaving it until 9am means the majority of children are either in school or childcare so would not be exposed to something that could be determined just part of everyday life. As someone who has suffered harm caused by alcohol on more than 1 occasion and to which on one of these occasions if the operating hours were only 9am -- 9pm it

Draft Local Alcohol Policy 2025 from Hawker, Wayne

may have helped my family who had to deal with an alcoholic [REDACTED] who had very easy access to alcohol either in the early morning or later in the evening more so than during the day given [REDACTED] still held down employment

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

Yes I agree with the decision to freeze all new off license applications, but disagree with the restrictions on just in higher deprivation areas

Which part of this proposal would you change?

Required question

Reality is with a very high number of off license premises already spread far and wide across the greater canterbury region there are more than enough already available to meet the needs of the wider community.

Irrespective of where these off license premises are any one of them is available for anyone living in any community across the city despite any deprivation rating to be able to buy. The majority of people have cars and given the fine line between what is a high deprivation area and what is not it would be impossible to fully police such a decision. It is widely used that anyone who generally lives within 2km of a new liquor license can put in a submission to either support or oppose an application so what would happen if a new application was submitted for an address located less than 1km-2km from what council may identify as a high deprivation area.

Based on this logic the applicant would have strong grounds to put in an application simply because of council policy and would more than likely be successful despite being so close to a high deprivation area where those living in it could then have easy access to alcohol and potentially adding further alcohol harm in a deprived community.

I believe there should be a complete freeze on new off license applications for a period of at least 18months and then revisited as by then there maybe a few new subdivision developments with new shopping centres that subject to the number of off licensed premises already operating within a 2km radius of any new site would determine whether new off license premises would be needed, but given the high transport numbers of cars currently on our roads I do not see any reason for any more new off licenses in the foreseeable future , further more I strongly believe that there should be some changes made to location of off licenses that should say there should not be 2 or more off license premises and selling the same products operating within a 500m radius of each other, so if someone like a supermarket wants to sell beer and wine then if another liquor store wants to open within 500m radius of such supermarket they would be unable to sell beer and wine and this should apply across the board of all current off license holders as well and dependent on when they are set to renew that is when you impose this new policy.

It is already common knowledge that one of the major supermarket chains also owns a major liquor store outlet brand and are exploiting the current laws to try and dominate alcohol sales across the region

Restricting new bottle stores' proximity to sensitive community facilities

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)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

Draft Local Alcohol Policy 2025 from Hawker, Wayne

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

This is a no brainer and should not apply to just new applications but should be enforced across all off license holders and when their application for a license renewal comes up they are given a 18 month grace period to relocate to a premises out side the new parameters set.

We need to do everything possible to protect our most vulnerable and in doing this council would be sending a clear message they are listening to the community and recognise that the vulnerable whom live across many communities in the greater canterbury region are protected to the best ability of the council.

Restricting new bottle stores' proximity to sensitive community facilities

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?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

Please refer to my response to restricting bottle stores opening within 200m

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

Please refer to my response of 200m from these area's . both 50m or 100m is still way to close to any of the identified sensitive area's and while 200m is still not far enough we have to be reasonable

General feedback

Do you have any other comments?

The law currently states we can not drive while under the influence of alcohol and rightly so although I strongly believe it should be zero tolerance for everyone.

So why is it the Alcohol sector can try and influence drivers in their cars to but their brands and products while they are sitting in their cars especially at major city intersections controlled by traffic lights therefore having a captured audience and possibly sparking someone who may not have been thinking about it, to on impulse drive to a liquor outlet on their way to where ever they are going and purchase alcohol.

My understanding council have the ability to control roadside advertising so there needs to be something done to stop all roadside advertising of alcohol. Also I believe that all stand alone off license premises should be required to not have roadside window advertising and all roadside, footpath side windows should be covered over up to a height of 2metres therefore stopping vulnerable children from looking into these shops.

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Draft Local Alcohol Policy 2025 from Hawker, Wayne

There is a precedent for this as when the case of Phillipstown Community took on Liquorland a few years ago that was one of the options that was suggested to placate the community. Fortunately the community won that battle and that liquor outlet never eventuated.

A number of years ago while coaching netball one of the parents a(a graduated and qualified scientist) of a player I was coaching said she was rather confused , given that in the scientific world alcohol is regarded as the most potential addictive poison in the world yet we both make it legal and sell it to anyone.

Item 4

Attachment A

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Tim Last Name: (required) Donaldson

Please provide the organisation name:
(required)

Foodstuffs South Island Limited

Your role and the number of people your
organisation represents: (required)

General Manager - Retail, Wholesale and Property

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

No

Please tell us why you don't support this proposal:

Please see attached submission.

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

Please see attached submission.

Which part of this proposal would you change?

Required question

Please see attached submission.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

T24Consult Page 1 of 2

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You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

Please see attached submission.

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

Please see attached submission.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

Please see attached submission.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

Off-licence

Attached Documents

Name
FSSI Submissions - CCC - Draft LAP

Submissions on Christchurch City Council's Draft Local Alcohol Policy

Introduction

Foodstuffs South Island Limited is a retailer owned co-operative for the PAK'nSAVE, New World and Four Square brands in the South Island.

The Christchurch City Council has invited feedback on its Draft Local Alcohol Policy (DLAP). We are writing on behalf of Foodstuffs and its stores. Foodstuffs takes many steps to ensure our stores are responsible retailers of alcohol.

Foodstuffs considers that the proposal to restrict the maximum licensed trading hours for all off-licenses to 9pm, including supermarkets and grocery stores, is unreasonable and should be removed or amended to 10pm.

Who We Are

The Foodstuffs South Island co-operative of grocers has existed for over 100 years and is proudly 100% Kiwi owned and operated. We have grown from humble beginnings to become one of New Zealand's biggest grocery distributors. Our locally owned and operated stores are active members of their communities and as small, medium and large employers, they continuously strive to give back by sponsoring and giving support to a wide range of charitable initiatives, sports teams and schools.

The Foodstuffs' stores in the Christchurch City Council district (which includes Banks Peninsula) are:

1. New World Durham Street
2. New World Stanmore Road
3. New World St Martins
4. New World Halswell
5. New World Fendalton
6. New World Ilam
7. New World Ferry Road
8. New World Prestons
9. New World Wigram
10. New World Bishopdale
11. PAK'nSAVE Hornby
12. PAK'nSAVE Moorehouse
13. PAK'nSAVE Papanui
14. PAK'nSAVE Riccarton
15. PAK'nSAVE Wainoni
16. Four Square Diamond Harbour
17. Four Square Akaroa

We have plans to open more stores in the Christchurch City Council district in the next few years.

Off-license maximum trading hours

Our stores hold off-licences. There is no existing Local Alcohol Policy in Christchurch and Banks Peninsula. Therefore the maximum trading hours for off-licensed premises (including bottle stores, grocery stores and supermarkets) are the default national maximum in the Sale and Supply of Alcohol Act 2012 (the Act) – being 7am to 11pm.

The DLAP proposes to reduce the maximum trading hours for all off-licensed premises within the district to 7am to 9pm, Monday to Sunday.

Foodstuffs is not aware of any evidence or reason that would justify the proposed reduction in maximum trading hours for all off-licensed premises, and particularly for supermarkets and grocery stores.

We note that the trading hours specified in a local alcohol policy are only the maximum possible. In any given case, the District Licensing Committee can impose more restrictive hours when that is appropriate to address alcohol-related harm. There is no obligation to grant a licence with the full maximum permitted hours stated in a local alcohol policy.

Therefore, the maximum hours stated in the DLAP should take into account the need to provide options and flexibility. They should be considered within the context of the district's most suitable and responsible licencees and the need to provide flexibility for future growth, development and socio-economic changes and other changes in the region.

We set out below for your reference the usual store trading hours for our stores in the Christchurch City Council district.

Store	Store's usual trading hours	Store will be affected by proposed alcohol trading hours reduced to 9pm
New World Durham	7.00am to 10.00pm	Yes
New World Stanmore	7.00am to 9.00pm	No
New World St Martins	7.30am to 10.00pm	Yes
New World Halswell	7.30am to 9.00pm	No
New World Fendalton	7.30am to 9.00pm	No
New World Ilam	7.30am to 10.00pm	Yes
New World Ferry Road	7.00am to 9.00pm	No
New World Prestons	7.00am to 9.00pm	No
New World Wigram	7.30am to 10.00pm	Yes
New World Northwood	7.00am to 9.00pm	No
New World Bishopdale	7.00am to 9.00pm	No
PAK'nSAVE Hornby	7.00am to 10.00pm	Yes
PAK'nSAVE Moorhouse	7.00am to 10.00pm	Yes
PAK'nSAVE Papanui	7.00am to 10.00pm	Yes
PAK'nSAVE Riccarton	7.00am to 10.00pm	Yes
PAK'nSAVE Wainoni	7.00am to 10.00pm	Yes
Four Square Diamond Harbour	8.00am to 7.00pm	No
Four Square Akaroa	8.00am to 6.30pm (weekdays) and 7.00pm (weekends)	No

As shown above, we have nine stores that would be affected by a reduction in off licensed maximum trading hours to 9pm.

We believe that the maximum licensed hours under the Act (7am to 11pm) should remain for supermarket and grocery store off-licenses.

One of our concerns is to avoid unnecessarily or unreasonably inconveniencing our customers, the rate payers and residents of the Christchurch City Council, as well as holiday-makers and other visitors to Christchurch.

Many of these customers wish to complete a full grocery shop, including beer and wine purchases during the opening hours of our stores. By not allowing these Christchurch customers the opportunity to purchase beer and wine during what will normally be their full weekly shop would lead to a major inconvenience and is contrary to community retail patterns and demand. Our current trading hours have come about directly as a result of customer demand.

Lifestyles in New Zealand have changed dramatically over the decades. Just as we no longer predominantly work from 9am until 5pm, or only have a one worker household, our retailing behaviour has also changed. Nowadays we must accommodate shift workers, tag teaming parents, busier and busier lifestyles and more variant household unit compositions.

It is a normal and generally accepted customer behaviour that many customers will choose to shop only when a full supermarket offer (which includes beer and wine) is available. A very good practical example of this is Ilam New World. Ilam New World opened on 18 December 2011 without a liquor licence. This was as a consequence of the liquor hearing being delayed, which had a significant negative impact on the number of customers who chose to shop at the store.

Foodstuffs believe that if the DLAP restricts off-licence hours to 7am - 9pm, the demand for grocery shopping outside the liquor license hours will inevitably reduce, affecting not just the viability of opening between 9pm to 10pm but also directly affecting the lifestyle options of the residents of Christchurch and our community.

Another one of our concerns is the health and safety of our supermarket staff. Abuse of staff by customers and other incidents of violence and dangerous behaviour is a growing problem for many retailers.

We expect that our supermarket staff will have to deal with verbal abuse and threats when a supermarket remains open from 9pm to 10pm, but alcohol areas are blocked off and alcohol purchases are not permitted. This behaviour will not only come from the relatively small percentage of disruptive customers but we expect it will also come from frustrated everyday customers who are trying to do their normal shop between 8 to 10pm (because they may start their shop prior to 8pm but do not checkout and pay until after 9pm).

If customer behaviour and economics force supermarkets to change their normal opening hours to align with the proposed reduced alcohol licensing hours, then the unintended consequences of 7am to 9pm off-licence hours may be that the consumer will not be able to shop at a Foodstuffs supermarket after 9pm, causing the community significant inconvenience, including employment impacts.

Community feedback on off-licence maximum trading hours

Foodstuffs acknowledges that community feedback and views are important considerations for an LAP. We note from the Council's LAP Early Engagement Analysis Report (March 2025) that 879 respondents were of the view that supermarkets should stop selling alcohol at 9pm. Whereas 1,651 respondents were of the view that supermarkets should stop selling alcohol at 10pm or 11pm. Meaning, almost double the respondents preferred 10pm or 11pm (instead of 9pm) for supermarkets.

Given that and the data set out in the Analysis Report at Table 1.4, it is Foodstuffs' view that there is clear community support for both 10pm and 11pm maximum alcohol trading hours for off-licences.

It is Foodstuffs' submission that no conclusion can be drawn that 9pm is the appropriate maximum given the data. It would be more appropriate for the maximum to be 10pm to align closer with majority of the community's views.

Freeze on issue of new off-licences in high deprivation areas

Foodstuffs does not have any plans to build a new supermarket within the DLAP's specified high deprivation areas within the next few years. However, we believe it is important that the final LAP retains the specific exemption set out at 6.3 of the DLAP where the primary purpose of their business is not the sale and supply of alcohol (ie.g. a supermarket).

The Council will be aware of the New Zealand government's current RFI process which is seeking additional entrants and expanders in the grocery industry. As illustrated with the Ilam New World example above, it is important for supermarkets (and small grocery stores) to be able to compete effectively with other existing supermarkets and offer a full shop to consumers to ensure they can remain viable and open/operate in underserved areas.

The New Zealand government is already undertaking work to reduce regulatory barriers for investors and developers (e.g. the Resource Management Act 1991 and Overseas Investment Act 2005). Part of this will also look at town planning and local zoning matters. In Foodstuffs' view, the exemption set out in 6.3 of the DLAP must remain so that an additional regulatory barrier is not stood up at the same time the New Zealand government is focused on reducing regulatory barriers.

Foodstuffs agrees with the policy provision in the DLAP in relation to renewals of existing off-licences and change of ownership. PAK'nSAVE, New World and Four Square stores are owner operated by local rate payers who are members of the Foodstuffs co-operative. These stores change ownership when a departing member sells their store to a new member. Should either of the exceptions at 6.5 be removed, it would significantly and unreasonably impact our members and their stores.

Object of the Act

One of the objects of the Act is that the harm caused by the excessive or inappropriate consumption of alcohol should be minimised. We don't believe that the Council has produced any evidence that demonstrates reducing off-licencing hours to 9pm will lead to the minimisation of harm from alcohol consumption. Restricting the licencing hours will simply penalise the vast silent majority of shoppers who have a healthy and responsible attitude towards alcohol. Those that are at risk from excessive or inappropriate alcohol consumption will simply change their shopping behaviours by choosing to purchase at a different time or location.

Cross-border purchasing

The Council should also be concerned at potential "cross border" purchasing. The Waimakariri District Council's LAP has less restrictive licensing hours for off licence premises (7am to 10pm).

Councils bordering Christchurch which have less restrictive licensing hours for off licence premises could lead to significant unintended consequences with respect to shopping and driving behaviour. Examples of stores that are geographically very close but could be susceptible to cross border purchasing are Northwood and Kaiapoi.

Foodstuffs would like to appear to present our submission at the public hearing.

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 20/04/2025

First Name: (required) Bruce Last Name: (required) Tulloch

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

The harm of excessive alcohol consumption is irrefutably established. Availability facilitates consumption. Late evening/night time access encourages impulse purchase and replenishment of supplies for those already drinking and already affected, with consequent risk of more domestic violence, sexual coercion and self-harm as well as neighbourhood disturbance and vulnerability. It encourages bulk purchases for after-dark antisocial activities such as "boy racer" gatherings and other disorder, not only fueling harmful driving but providing bottles as missiles against police control. Enabling late-night drinking raises health risks through reduced sleep and lingering impairment next morning, eg driving or working under the influence.

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

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[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

The evidence of disproportionate harm in these areas is inescapable.

Limits need to be beyond the immediate boundary of decile 8, 9 and 10 blocks. In an application in Harewood in 2017 the site, Trafford Street, was decile 1 on one side of the road and decile 9 on the other, with three decile 8 and 1 Decile 10 block within 500 metres of the proposed bottle store.

Concerned re exemption possibility for those who can show that their primary purpose is not the sale and supply of alcohol. EG a supermarket's primary purpose is not the sale of alcohol but it is a major secondary purpose as a means of making profit.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

Reduce public exposure, including advertising, in vulnerable areas.

Need also consider situation where new sensitive sites are established within 200 metres of an existing liquor outlet.

Restricting new bottle stores' proximity to sensitive community facilities

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?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

Minimize vulnerable people, pupils parents/caregivers etc exposure to easy impulse buying and to normalization of alcohol purchase. "Alcopops" are aimed at the younger population and control of sale is not always adequate - as in sale of vapes.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa,

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Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

Constricted communities

General feedback

Do you have any other comments?

In June 2016 an application was lodged for a liquor license for a new shop on the corner of Harewood Road and Trafford Street, Christchurch, I was involved in objecting to this. Over 1100 residents within one kilometer signed a petition against it and objectors filled the Fendaton Library hearing venue over two days, 13/14 July 2017. Decision 60C(2017)1766 - Denied

I was afterwards invited to assist groups opposing other applications in Christchurch in 2018 Barrington Street, Spreydon, hearing on 14/15 February Decision 60B(2018)638 - Denied

Ferry Road, Phillipstown, hearing 19/20 March Decision 60A (2018) 1131, Denied. Appealed, and in May was again denied.

I also attended the hearing on an application in Hornby in April 2021 Decision Number: 60E [2020] 6837, Denied

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Post Hearing Report 

LIQUOR LICENCING HEARING, Trafford Street/Harewood Road site, Christchurch,
13/14 July 2017. Decision No 60C [2017] 1766.

Report on behalf of Submitters.

While we are very pleased with the DLC's decision to decline the application, at a post-hearing meeting of submitters it was felt that there were aspects of the process which deserved notice. Some matters are beyond the Committee's brief but in the interests of best meeting the object of the Act we would appreciate these comments being passed on to the appropriate authorities in case improvements can be made.

Evidence provided

While the District Licensing Committee, officials assisting and the applicant and his lawyer receive the submissions and related information from the objectors in advance the submitters are not entitled to view the reports and briefs of evidence until at the hearing. This does not give adequate time to analyze the contents (43 pages in the Inspector's case), judge the accuracy or relevance and prepare any necessary rebuttal or questions, especially in a one-day hearing.

As members of the public usually have limited specialized information it is important that DLC Inspector's Reports are accurate as they support Councils' responsibility to the public.

There have been questions about the Inspector's Report in this case. Some are noted below.

Alcohol availability/crime relationship

Page 6 Item 15. Public Objections, Amenity and good order. The Inspector's comments include –

"Many of the objectors speculate what may happen if a bottle store locates to this area. From my experience such concerns do not eventuate and have no evidential basis to them"

There is considerable reputable research which appears to refute this. The GeoHealth Laboratory, Department of Geography, University of Canterbury, New Zealand report published in the 2012 VOL. 36 NO. 1 AUSTRALIAN AND NEW ZEALAND JOURNAL OF PUBLIC HEALTH is headed "Close proximity to alcohol outlets is associated with increased serious violent crime in New Zealand" and the concluding paragraph states

"This study has established that in NZ there is a strong association between geographic access to alcohol outlets and area-level serious violent crime, with high incidence of crime in areas with greatest locational access to alcohol outlets and reduced crime incidence in areas where access is less.

The high and socially disparate density of alcohol outlets promote environments which foster social conditions that may impact on alcohol-related harms and contribute to inequalities in health. Policies to reduce the availability of alcohol should involve greater efforts to improve local alcohol retail environments including interventions restricting the establishment and trading hours of alcohol outlets, particularly in socially disadvantaged neighbourhoods and neighbourhoods with vulnerable populations."

Similar conclusions are in the NZ Law Commission Report 114 of April 2010, the Christchurch District Health Board to the Christchurch Draft Local Alcohol Policy hearing and the University of Waikato study for the Health Promotion Agency of January this year, available at <http://www.hpa.org.nz/sites/default/files/HPA%20Outlets%20Report%20January%202017.pdf>

One would expect an Inspector would be aware of the general New Zealand situation.

Socioeconomic indicators

Page 3, Item 12. Assessment Criteria. It is noted that the supplementary CCC data with the report shows the Harewood ward as having the majority of households as least deprived, 42% compared with 26% of all Christchurch's population. This is too generalized to be useful.

The hearing decided that households significantly affected were only those within only 500 metres of the proposed store. The map below shows that while houses to the West of Trafford Street are Social Deprivation Index 1 those to the East are Index 9, 8 and 10.

The Police Brief of Evidence (Pages 4 and 5 and map JHX07) highlights the high index area as source of the bulk of reported crime, predominantly domestic violence. The Police also advise that such reported crime is a very low proportion of that actually occurring. It does not include other impacts on amenity as excessive noise, aggressive dogs, littering and anti-social behaviour. Making alcohol available in the immediate vicinity will inevitably have an effect.

Even in a generally favoured area properties can be rented to irresponsible tenants or have disruptive occupants so broad-scale socioeconomic data such as the 20 pages of supplementary information with the Inspector's report is irrelevant as a guide to the effects in a limited location.



Drinking in public areas.

Submitters pointed out concerns about increased drinking in reserves and nearby Nunweek Park. The Inspector's report (Pages 4 and 5) notes walking around *Bishopdale Park* and not seeing evidence of drinking. Photos of this park were included, however it is some 690 metres to the East of Trafford Street, well outside the catchment for the proposed store.

The relevant park is actually Nunweek Park which is only half as far away, directly adjoining the houses on the West of the affected area. It is not understood why this closest park was ignored by the Inspector. The sports grounds there attract big crowds in season. The nearby Super Liquor store in Wairakei Road regularly parks an advertising trailer beside the park. Rubbish bins by the car parking areas are cleared regularly but cans and bottles accumulate elsewhere, including in small local reserves.

The report also declares that off-licence sellers can ensure "that they do not sell alcohol to people whom they know drink in a public place." One must wonder how they know where purchasers will drink. Are they likely to ask purchasers, and if so are they likely to get an honest answer? This statement lacks credibility.

Alternative alcohol sources

On Page 4, re S106(1)(a)iii, it is stated

"There are two similar premises in the area nearly 1km away. (see attachment C). "

Also "I remind the Committee that the assessment is against similar premises. In this instance that is a general bottle store.

There is also a supermarket and tavern across the bar off-licence on the edge of the 1km radius to the south east and a winery on the edge of the 1km radius to the north west."

The Attachment C identifies two off licenses within 1 km of the proposed premises – Henrys at the Bishopdale Shopping Centre and what was Star liquor, now Super Liquor Burnside, in Wairakei Road. Strangely, it places Henry's as 981m from the proposed bottle store "as the crow flies" but 1.4km driving distance. As both places are beside Harewood Road and this is a straight line the discrepancy seems odd.

The big New World Supermarket is just across the carpark from Henrys. As the great majority of people around Trafford Street would use this regularly for food and household purchases and as it has a large liquor section it would be a major source for take-away alcohol, so should be taken into consideration when looking at local availability. Assessing "similar premises" should surely be on any off-license outlets, not just general bottle stores.

Time to consider application evidence and reports

As mentioned earlier the Inspector's report was bulky, 43 pages including supplementary information, and only a limited number of copies were available at the hearing. Some content was open to challenge and a considerable amount too generalized to be relevant to the area under scrutiny. At a one-day hearing objectors would have very little chance of analyzing it while the rest of the business was going on. This gives a strong bias in favour of the applicant.

General observations.

Traffic

The Committee advised that traffic issues were not within the hearing's scope. It is appreciated that in many areas traffic may not be a significant consideration but in this case there could be serious risks to vehicles and pedestrians.

The PRESS reports, 13 October, that Harewood Road had the highest rate nationally of speeding infringements, 11 out of every 100 motorists being picked up when speed cameras operated.

At busy times there are two lanes of almost continuous traffic going each way, and quickly. The Trafford Street intersection is congested. Crofton Road intersects on the other side. Parked vehicles near the corner limit the opportunity to see passing traffic as it is necessary to have gaps on both sides of Harewood Road when turning right. The applicant said he expected to get most of his business from commuters on their way home. This is at the very busiest time for the fast-moving traffic.

We therefore believe that where appropriate there should be a report provided by the traffic authorities.

Submitting restraints

It was mentioned in the Protocol and Procedure notes provided that the Committee's decision would be on the balance of probabilities. This is understood, however the applicant's lawyer endeavored to restrict input to certainties provable in advance. It is, of course, not possible to prove what will happen in future but experience provides a good guide. Both the applicant's lawyer and the Licensing Inspector objected to submitters' suggesting there would be adverse effects. They also dismissed the evidence from universities, other qualified research and reports from health services and the Police.

Those living in the area know what problems already exist and what are likely to increase if more alcohol is freely available. As we had two days and as there were competent objectors it was possible to rebut some of the claims but in a shorter hearing and without confident submitters it could be very hard for the community to oppose applicants who have legal support.

Time

Time to prepare is very limited. For a community to find coordinators, spread the word and organize adequate opposition in time is not easy. Objections must be submitted within 15 working days of public notice. If community response is to be realistic a longer time is highly desirable.

Not everyone gets a newspaper and few of these would scan the Public Notices every day. Notices on the premises concerned are not always obvious, the initial application for the Harewood bottle store was withdrawn. Notice of an amended application was in the paper on Tuesday 25 April, Anzac Day, a holiday. No notice was put in the shop window until a week later, and then only after a call to the Licensing office to query its absence. This would have given anyone seeing it only 10 days to act. Without the call to the office there may not have been any notice in the shop window, whether this would be by ineptitude or design is not know.

Attending Hearings

We had heard that unless submissions were supported verbally at hearings they may not be taken seriously. The importance of testing evidence by cross-examination is understood but it can be very difficult for people to attend when work, family or other commitments or hindrances exist. Also some can be intimidated by the process and may not feel confident or competent to speak well. At our hearing the process was very well run and also there were a good number of speakers who could both present their case and question evidence, however this may not be common.

There could be scope for a public assistant to meet submitters at a convenient time and place, with authority to check the evidence and judge whether it is fit for the Committee to accept. This may not be perfect but it would help address the very considerable imbalance that exists at present.

Audibility in the hearing

It was not always easy to hear. The venue was full with the audience sitting behind the applicant and his legal team. Those giving evidence spoke from the side but during cross-examination and questioning it was often hard to hear both parties. If significant attendance is expected public address facilities could be desirable.

Contradiction in the Act

The Object of the Sale and Supply of Liquor Act is -

(1)

- (a) the sale, supply, and consumption of alcohol should be undertaken safely and responsibly; and
- (b) the harm caused by the excessive or inappropriate consumption of alcohol should be minimised.

(2)

For the purposes of subsection (1), **the harm caused by the excessive or inappropriate consumption of alcohol includes—**

- (a) any crime, damage, death, disease, disorderly behaviour, illness, or injury, directly or indirectly caused, or directly or indirectly contributed to, by the excessive or inappropriate consumption of alcohol; and
- (b) **any harm to society generally or the community, directly or indirectly caused, or directly or indirectly contributed to,** by any crime, damage, death, disease, disorderly behaviour, illness, or injury of a kind described in paragraph (a).

In the Inspector's report, Page 10, it states that "the licensee of any off-licence has no control over how people consume the alcohol they purchase at their premises",

This is obvious, but off-licence sales facilitates consumption and consequent harm elsewhere, such as in domestic situations. If the seller has no responsibility for the consequences of their sales this ignores the requirement that any harm "to society generally or the community, directly or indirectly caused... or contributed to" by the excessive or inappropriate consumption of alcohol should be minimized.

Considering the research showing the direct relationship between access to alcohol and crime proliferation of outlets in or near residential areas seems to conflict with 1 b above.

16 November 2017

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 12/05/2025

First Name: (required) Liz Last Name: (required) Gordon

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

This will hugely reduce night time alcohol related crime, assaults, family violence and also some illness. This is great. I would like to see a further to stop sales until 9am each morning too. Noone should need to buy alcohol at 7am!

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

Freeze on new off licences.

Which part of this proposal would you change?

Required question

Alcohol harm occurs throughout the city. We have 65 liquor stores, 20 plus licensed supermarkets and numerous other off licences.

Noone should get a new off-licence for at least three years anywhere in the city. Particular points:

1. The city is round and areas of high deprivation abut areas of lower deprivation. If the purpose is to reduce the number of liquor stores in highly deprived areas, then you won't be moving them far - what is the point?

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2. At a licence hearing last year [REDACTED] of Waltham showed on a map that there were fifteen liquor stores within a six minute drive of where [REDACTED] lived. Why does he need 15? There is nothing on this map that will stop him having 20!
3. This brings us to a really important point that the Council needs to think about seriously. The DLC has said several times in hearings that it is looking for guidance from the Council LAP regarding things like new liquor stores. There is a huge danger, in my view nearly a certainty, that in most cases of new liquor store applications, the DLC will ignore any community objections and allow new licences anywhere because the LAP has not seen fit to ban them and thus condones them. This is a likely unintended effect of the LAP. One way of deal with this is to put a rebuttable presumption into the LAP that there are already enough liquor stores in Christchurch and no new ones should open for three years.
4. For example, there are already two new off-licence applications in the central city area. NOT in the overlay but in the highest crime meshblock (SA1) in the country (6181/ 6181). One of the liquor stores is practically opposite the Bus Exchange which is very sensitive area especially for youth. They even have a safe room in that premises to stop crime, bullying and violence. In short (a) there are vulnerabilities other than high deprivation that should mean that no new liquor stores are opened and (b) there is no guarantee at all that the DLC won't just say - the Council thinks it is OK - good enough for us. In fact, I am sure they will.
5. While Fendalton can protect itself, and did so 3 years ago when someone decided (but failed) to open a liquor store at 5 Memorial Avenue, there are other suburbs of moderate deprivation that still have many vulnerabilities, high needs and little ability to defend an influx of liquor stores.
6. To offer a little more protection you could extend the overlay to include all alcohol ban areas, which would help in the central city and Colombo Street. But that would only help a little.
7. I think one possible outcome is to begin from the position - how many more liquor stores do we really need in Christchurch and where? I think councillors would quickly see there are already many. Liquor store owners are always seeking to open new stores. The average liquor store in Christchurch sells 3-7 million dollars worth of alcohol each year. It is big money if you can get yourself a new one, so expansionist pressures are always there.
8. In short, the Council can be bolder in this regard - stop all new liquor stores in teh city for three years and then review.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

I like it OK but it has the same problems I referred to in the previous question - operators will just look for new premises just outside these areas, on bus routes, near homes - they will still be in the community

Which part of this proposal would you change?

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Required question

Ban on all new liquor stores for three years in Christchurch because there is no need for more. Then review.

If the Council is determined to go down this route, then at least liquor ban areas should be included as sensitive sites - citizens are restricted from drinking in these areas because of deemed dangers, so they must be sensitive.

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

No

Please tell us why you don't support this proposal:

Not nearly enough distance. 100/50 meters far too close. The centre city zone is alcohol soaked and dangerous and needs significant controls. No more liquor stores in the city centre. No more liquor stores in liquor ban areas.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

No

Please tell us why you don't support this proposal:

I support a 200 meter ban in these areas. 50 meters is timid.

General feedback

Do you have any other comments?

Great start, Council. Next things on the agenda for LAPs:

1. Reducing the number of liquor stores
2. Closing liquor stores at 5.30 pm like other shops
3. Stopping sales of harmful products especially those targeted at youth.
4. Removing all alcohol advertising from all alcohol outlets including franchise branding, product advertising and price advertising.

Licences

Finally, do you currently hold any of the following (select all that apply)?

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Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Factsheet CAAH summary

Item 4

Attachment A

SUMMARY FACTSHEET ALCOHOL HARM IN AOTEAROA¹



Alcohol is New Zealand's most harmful drug by far. More harm is caused to non-drinkers than drinkers, particularly because of the epidemic of Foetal Alcohol Spectrum Disorder. It is estimated (2024) that alcohol-related harm cost the state around \$9.1 billion last year.

Estimated 2024 sales of alcohol in New Zealand are \$7.0 billion for off licence, and \$5.2 billion for on-licence, sales, a total of \$12.2 billion in gross sales.

This means that for every dollar spent on retail alcohol products, taxpayers pay out 75 cents in harm-related costs. This is a very high burden.

Around one in every 6 New Zealand adults in 2022-23 had a hazardous drinking pattern that places them or others at risk of harm, from birth defects to disease, crime and accident.

Māori and people in areas of high deprivation are more likely to suffer alcohol harm, but such harm occurs in all communities. Men account for the "vast bulk" (c. 80%) of health harm.

In 2018 over 900 deaths, 29,282 hospitalisations and 128,963 ACC claims were attributed to alcohol. About 42% of alcohol-caused deaths were from cancer, another 33% from injuries and the rest stemming from conditions such as liver cirrhosis, pancreatitis and epilepsy.

This health data does not capture the deaths, injuries and claims of non-drinking victims. More New Zealanders are harmed by the drinking of others, than from their own drinking.

In 2006 it was estimated that 100,000 people were addicted to alcohol or used it abusively. There are no more recent figures. Alcohol addiction cannot be cured but can be successfully treated. The high visibility of alcohol makes recovery harder.

Around one third of offences recorded by police are committed by people who consumed alcohol prior to the offence, or around 300 offences per day.

In 2022, driver alcohol/drugs contributed to 163 of 340 total fatal crashes, 144 serious injury crashes and 776 minor injury crashes. In these crashes 178 people died, 245 were seriously injured, and 1081 suffered minor injuries.

In summary, alcohol is implicated in around a third of all police-recorded offences, a third of violent and family violence incidents, one third of suicides and around half of all homicides.

Alcohol-related crime more than doubles late at night and at weekends. Most policing between 5pm on a Friday evening until Monday morning is alcohol related.

392,800 workdays are lost to alcohol each year and 10% of people have worked under the influence of alcohol.

New Zealanders drink 36 million litres of pure alcohol per year or 8.7 litres per person 15+. Each New Zealander drinks an average of nearly 2 standard drinks per day.

NZ ranks 32 on the World Factbook re alcohol consumption, lower than Australia, the UK and most of Europe but higher than the USA, Russia and Japan. Alcohol consumption is higher in NZ than in every country in Asia, North America, South America and the Middle East.

There is a trend towards low- and no-alcohol drinks among moderate drinkers. However, this trend has barely shifted the amount of harmful drinking, nor reduced alcohol harm.

¹ All figures derived from official sources and peer-reviewed studies, see in particular <https://www.health.govt.nz/system/files/documents/publications/alcohol-factsheets.pdf>

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 17/05/2025

First Name: (required) Lisa Last Name: (required) Cowe

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

I'm not sure

Please tell us why you're not sure:

Refer to my submission attached

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

I'm not sure

Please tell us why you're not sure:

Refer to my submission attached

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

Refer to my submission attached

Restricting new bottle stores' proximity to sensitive community facilities

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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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

Refer to my submission attached

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

Refer to my submission attached

General feedback

Do you have any other comments?

Refer to my submission attached

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Email 2
Email 1
LAP Submission Final

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From:

Sent:

Tuesday, 25 March 2025 5:15 pm

To:

Cc:

Subject:

off licence renewal

Thank

My client feels there is an element of harassment arising, amongst other concerns. I'm obliged to assist him with that, and it would be remiss to not alert your client to it. It may well be a theme of any evidence we are required to call in relation to your client's objection.

Timely advice as to the scope of your client's objection and what will be pursued would be helpful.

We will have to agree to disagree on the utility of Ms Cowes previous evidence (noting some of it was not hers).

Regards,

Communications sent by email can be intercepted or corrupted. For this reason [REDACTED] does not accept any responsibility for a breach of confidence arising through use of this medium.

The material in this email is confidential to the individual or the entity named above, and may be protected by legal privilege. If you are not the intended recipient: please do not copy, use or disclose this communication; please notify us immediately by email (to [REDACTED] or press reply) or by telephone [REDACTED] then delete this email.

Where this is a communication unrelated to the business of [REDACTED] does not accept any responsibility for its contents.

Please consider the environment before printing this e-mail

Current Covid-19 protocols are being observed. Our teams are available by phone, email or by video conference.

From:

Sent: Tuesday, 25 March 2025 5:09 pm

Subject: RE: [REDACTED] off licence renewal

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From: [REDACTED]
Sent: Tuesday, 25 March 2025 9:51 am
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: [REDACTED] off licence renewal

Hello [REDACTED]

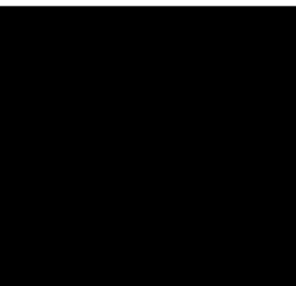
Is you client's opposition now limited to the issues in the attached documents circulated by you below?

My client considers that the other grounds advanced by Ms Cowe are vexatious as they have been previously considered and determined by the DLC (seeking to relitigate matters already determined has been held to be vexatious in numerous decisions of the courts). Your email appears to acknowledge this and goes further to say the operation of the premises has improved. In that context, the proper basis for Ms Cowe's objection is even more difficult to rationalise.

Moreover, you will recall that your client misled the Committee previously by referring to and describing behaviour in photos that were neither taken by her nor was she present at the time they were taken. There were numerous other shortcomings in relation to her evidence.

Can you please clarify as a matter of urgency. My client has sought advice in relation to civil remedies arising from your clients conduct and your response will be relevant to that advice. The conduct at the previous hearing and in relation to this application is also relevant to that advice (which is why I have summarised some of that behaviour above).

Regards,



Communications sent by email can be intercepted or corrupted. For this reason [REDACTED] does not accept any responsibility for a breach of confidence arising through use of this medium.

The material in this email is confidential to the individual or the entity named above, and may be protected by legal privilege. If you are not the intended recipient: please do not copy, use or disclose this communication; please notify us immediately by email (to [REDACTED] or press reply) or by telephone [REDACTED] then delete this email.

Where this is a communication unrelated to the business of [REDACTED] [REDACTED] does not accept any responsibility for its contents.

Please consider the environment before printing this e-mail

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Submission on Christchurch City Council Draft Local Alcohol Policy (LAP)

Submitted by: Lisa Jane Mary Cowe

Date: 16.05.25

1. Support for Earlier Closing Times

I support the proposal to reduce trading hours for off-licences to 9pm. Research and community feedback suggest that limiting late-night alcohol availability may reduce alcohol-related harm, particularly in vulnerable communities. This is a positive step forward.

2. Freezes and Restrictions

I support freezes on granting an off-licence to new premises in areas that serve all community rating levels and including high deprivation communities. This should apply to all new premises that sell any form of alcohol regardless of whether alcohol is their primary purpose or not. Restricting proximity to treatment centres and schools should be considered in kilometres not meters.

3. Need for Broader Consideration of Harm Factors

However, alcohol harm is not caused solely by late trading hours or outlet density. The LAP, as currently drafted, omits several key factors that contribute to harm:

- Sales practices and quantities: There is no limit on how much alcohol can be purchased by individuals or households, which contributes to excessive consumption in private settings - a known site of alcohol harm.
- Business operations and financial responsibility: Some alcohol retailers continue trading despite insolvency or substantial unpaid tax obligations. Publicly available High Court liquidation notices and documents confirm this, yet there are no reporting requirements or mechanisms to assess whether a licensee is operating a financially responsible or ethical business. When public money is used by the Inland Revenue to bring liquidation claims against a licensed trading company, the council should give weight to this public interest matter.
- Oversight and accountability: Licensing inspectors and the District Licensing Committee (DLC) are not required to examine the broader conduct of licence holders, including financial or employment practices that may affect community wellbeing.

4. Community Engagement and Intimidation Concerns

Clause 7.4 of the LAP allows applicants to seek an exemption from location restrictions if they can show they've engaged with the affected community. However, the policy lacks clarity on what constitutes meaningful engagement. For example:

- Is a single positive Google review considered "engagement"?
- Are negative reviews (e.g. complaints of poor service or unsafe environments) also considered?

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Moreover, my own experience illustrates that community members who raise legitimate concerns can be faced with legal threats from applicant lawyers, including accusations of harassment. In my case, my submission to oppose a licence renewal which was initially based on a public Gazette notice was struck out by the DLC without adequate explanation. I also received an email from an applicant lawyer threatening civil action which I attach to my submission.

5. Systemic Barriers to Public Participation

The current licensing framework is overly legalistic, time-restrictive, and difficult to navigate for the average resident:

- Hearings are typically held during business hours, limiting attendance.
- Submissions are discounted if the submitter does not appear in person or is deemed to live "too far away."
- Objectors without an official title or organisational backing are often dismissed, regardless of the relevance or merit of their concerns.

Such barriers disproportionately affect low-income and marginalised communities, perpetuating a system where those most affected by alcohol harm are least likely to be heard.

6. Data Transparency and Reporting Gaps

The LAP and its underlying research do not address the lack of data transparency in the alcohol industry. For example:

- There are no requirements to report quantities sold, profit margins, or household-level consumption data.
- Remote sales and alcohol deliveries - now increasingly common - are not subject to the same scrutiny as brick-and-mortar outlets.
- Financial performance and legal compliance of licence holders are not considered in the licence renewal process. The community should be allowed to understand how an outlet is operating. How it operates affects all aspects of trading decisions.

7. Recommendations

To create a more robust and effective LAP, I respectfully recommend:

1. Expanding the scope of the LAP to include:
 - Oversight of financial practices of licence holders.
 - Transparent data collection on alcohol sales volumes and consumption patterns.
 - Regulation of online and remote alcohol sales.
2. Strengthening community protections by:

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- Clarifying the definition of “community engagement” for applicants.
- Implementing formal protections against legal intimidation of community submitters.
- Providing greater weight to public submissions, regardless of geographic distance or organisational affiliation.

3. Advocating for legislative reform:

- While I understand the LAP must operate within the constraints of Section 77(1) of the Sale and Supply of Alcohol Act, if you cannot consider including my suggestions in your LAP then I urge the Council to advocate for a review of the Act to allow policies to reflect modern purchasing behaviours and real-world harm factors.

8. Conclusion

Alcohol harm in Christchurch cannot be effectively reduced through trading hours alone. A comprehensive and modern approach is needed - one that recognises the economic, social, and regulatory dimensions of alcohol supply and holds all stakeholders accountable. The community deserves a policy that reflects their lived realities and protects their wellbeing, not just one that satisfies legal minimums.

Thank you for considering my submission. I would welcome the opportunity to speak further to these points including speaking to my submission at your hearings.

Regards



Lisa Jane Mary Cowe



Encl.

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 18/05/2025

First Name: (required) Jo Last Name: (required) Bader

Please provide the organisation name:
(required)

Aviva

Your role and the number of people your
organisation represents: (required)

Senior Client Services Manager - Sexual Violence
Team

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Aviva is a Family Violence and Sexual Violence support, education, and prevention agency based in Ōtautahi and covering the Canterbury region. Aviva supports people of all genders and ages to live free from violence by providing individual and group education and support to tamariki, adults, and rangatahi who have experienced family violence, and adults aged 18 and over who have experienced sexual violence. Aviva also works with those who choose to use violence, or those at risk of using violence, including a dedicated Pasifika team. Aviva's sexual violence team provides court support for all ages who have experienced sexual violence and are progressing through the justice system.

There is a dearth of data that accurately represents incidents of family violence or sexual violence that are linked to alcohol misuse, and often there is not a distinction between whether alcohol was a factor for the user of violence or the person experiencing violence, so we are largely reliant on anecdotal evidence. Our team that works with users of violence have stated that for approximately 80% of the clients they work with, alcohol has been a factor in their use of violence. The clients have themselves stated that at times their safety plans have included not using alcohol. These clients commonly obtain their alcohol in the first instance from off-licence premises, so a reduction in opening hours increases safety for the community. We would recommend including sports clubs with a licence to sell alcohol in the restricted hours, as these are often premises where high levels of alcohol are consumed and where those more at risk of using violence congregate.

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)?

[You can view high deprivation maps here.](#)

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Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Violence is no respecter of socio-economic status. At Aviva we see victims of violence from every suburb in Christchurch, regardless of resourcing. We also see users of violence from every suburb in Christchurch. That said, it is well documented that poverty and increased life stressors such as cost of living are exacerbating factors in the use of violence. Whilst alcohol is not a cause of violence in and of itself, nor an excuse for violence, it is a significantly amplifying factor. Our preference would be to see an equitable freeze on new off-licences in *all* suburbs of Christchurch as this would send a clear message of intent to eliminate alcohol related harm that is not stigmatised to certain sectors of society.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

We support a proximity restriction within the central city, exempting the City Centre Zone.

Which part of this proposal would you change?

Required question

We would have the same rules of 200 metres as would exist outside the four avenues.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

Proximity restrictions.

Which part of this proposal would you change?

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Required question

We would like to see the proximity in these areas extended to 100 metres.

General feedback

Do you have any other comments?

The BERL report estimated that in 2020 the cost of sexual violence to the NZ economy was approximately 6.9 billion dollars per year. In a 2024 report Te Puna Aonui is quoted as reporting the costs of family violence is 7 billion per year. These figures combined represent a significant cost to individuals, communities and wider society. Commensurate to this is the economic cost of alcohol harm. Sexual violence, family violence, and alcohol misuse are intimately linked and we see this on a daily basis in our work. We receive referrals every single day to the sexual violence service, typically multiple referrals. On a Monday after the weekend, it is not uncommon for us to receive upwards of half a dozen referrals. Many of these have alcohol as a contributing factor and by far and away the most common drug used in drug assisted sexual assault is alcohol. Alcohol is a known disinhibitor and combined with the extremely high rates of alcohol misuse in Canterbury, increases risk to both those who choose to use violence, and those who might subsequently experience violence. During the Covid lockdown, the number of acute sexual assaults reduced significantly, in large part due to limited or no access to on and off licence premises selling alcohol. We are disappointed there are not further restrictions placed on on-licence premises and we would like to see stronger partnerships with Hospitality NZ and the City Council in order to eliminate the violence perpetrated when alcohol misuse occurs, particularly within the central city limits. The cross-party government goal of eliminating family violence and sexual violence as expressed in the 25 year plan Te Aorerekura cannot happen without addressing the harms caused by alcohol misuse. Whilst we commend the city council for developing a local alcohol policy, we believe you could go further with on-licence premises in order to ensure our city is a safe place to be.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 18/05/2025

First Name: (required) Sarah Last Name: (required) McKay

Please provide the organisation name:
(required)

Social Equity and Wellbeing Network

Your role and the number of people your
organisation represents: (required)

Community Advocate (3)

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

We have recently received feedback from a number of New Brighton residents about the negative impact of alcohol on thier community. These negative affects include not feeling safe to go to eateries in New Brighton mall and business area in the evenings due to fear of intoxicated people. Quote from residents:

"I've love to go support Brighton and the restaurants at night, but I don't because I feel unsafe, because of fear of the street drinking and it feels Insafe."

"...they should close at 9pm. I have been waiting at the bus stop on Oram Ave and felt uncomfortable with the drunk men around."

Later trading hours:

- Is linked to increased alcohol related harm such as family violence, drink driving and injuries

Reducing trading hours could:

- reduce late night impulsive drinking, particularly for vulnerable and younger drinkers
- reduce noise, vandalism and disturbances late night in communities
- reduce exposure to children for normalised alcohol use
- reduce pressure on Police, hospital and emergency services due to alcohol harm
- improve feelings of safety for people frequenting eatries and other local businesses due to a reduction in

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intoxicated people and behaviour

- this supports a harm reduction approach which focuses on reducing alcohol-related harm through a range of strategies at individual, community, and policy levels.

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Communities facing high levels of deprivation often already experience disproportionate alcohol-related harm. Increasing the density of alcohol outlets in these areas can compound social and health issues such as family violence, crime, and chronic illness. A freeze is a practical harm reduction measure that gives communities space to prioritise wellbeing, equity, and safety, especially where access to support services is already stretched. It's also a way to recognise and respond to the lived experiences of people in these neighbourhoods, who often have less power to influence alcohol availability.

Here are some quotes that Social Equity and Wellbeing Network collected about the negative impact of alcohol consumption in New Brighton. We support any measures such as reducing alcohol outlets, that supports an alcohol harm reduction approach.

"A guy followed me home from the mall in February this year. He was intoxicated and holding a can of alcohol. When I crossed road, he did as well and when I crossed again, he was still following me and wouldn't stop. I didn't want him to see where I lived. Thank goodness I was fit enough to run home and get to the sleepout before he saw me, cos I don't know what I would have done otherwise."

"My daughter was followed home coming back from the mall by a drunk man. He came up the drive and was holding the gate and rattling it and yelling at her. She ended up having to call the police...this was late last year."

Feedback from our local supermarket – "Intoxicated guys come in and intimidate the staff and one sat outside the front when he was drunk abusing the staff because they wouldn't sell him alcohol. They no longer have a security guard so younger staff are having to deal with it and they feel unsafe."

Women that live locally don't feel safe when they walk home, particularly by the bus stop across from the liquor store on Beresford Street. This person said her daughter and other staff members she knows avoid the area.

"I grew up in Brighton and its sad to see the litter from alcohol and drinking and we have vulnerable people who don't need all that easy access to cheap liquor"

"Weve had a lot of people come into our area while we've had children in the play group and it's been hard to get them out. This can happen on a daily basis. And for me personally as a young woman during the day when I walk down to get lunch, I have intoxicated people calling out, harassing behaviour. Its quite a big thing around here I've never come across such a concentration of intoxicated people in such a small area."

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Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

These are sensitive spaces where people—especially children, young people, and those in recovery—should be protected from constant exposure to alcohol marketing and easy access. Keeping a buffer zone helps reduce normalisation of alcohol use for young people and supports people in recovery by reducing triggers. It's a common-sense measure that prioritises community wellbeing and public health, particularly in neighbourhoods where the risk of alcohol harm is already high.

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

General feedback

Do you have any other comments?

In addition to being a community advocate for the Social Equity and Wellbeing Network, I have previously worked as a community worker in the New Brighton area and have lived in New Brighton for 18 years. Over this time, I have seen a significant increase in alcohol-related harm in the area in recent years—particularly anti-social behaviour. The harm this causes is visible in many ways:

- There has been a negative impact on individuals and families.
- Public health concerns such as addiction and mental ill-health are very evident.
- A number of community members and community organisations have spoken to me about this.
- Local businesses are affected—having to deal with intoxicated people and increased littering.
- There is a high level of public alcohol consumption by people who appear to be vulnerable.

This example highlights the significant negative impact alcohol can have on our communities. I strongly support any measures aimed at reducing alcohol-related harm. As the earlier quotes in this submission demonstrate,

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real harm is being experienced by community members—people are feeling unsafe, and the effects of alcohol misuse are also impacting local businesses and community groups. It is essential that we take all possible steps to reduce this harm and protect the wellbeing of our communities.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Paul Last Name: (required) Radich

Please provide the organisation name:
(required)

General Distributors Limited

Your role and the number of people your
organisation represents: (required)

National Alcohol Responsibility Manager

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

No

Please tell us why you don't support this proposal:

Please refer to our submission.

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)?

You can view high deprivation maps [here](#).

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

No

Please tell us why you don't support this proposal:

Please refer to our submission.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

T24Consult Page 1 of 2

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Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.
You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

Off-licence

Attached Documents

Name
General Distributors Limited Submission - Christchurch City Council LAP

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16 May 2025

Attn: [REDACTED]
Christchurch City Council
PO Box 73016
CHRISTCHURCH 8154

By online submission

SUBMISSION ON THE CHRISTCHURCH CITY COUNCIL DRAFT LOCAL ALCOHOL POLICY

Summary

1. As an off-licence holder in Christchurch, General Distributors Limited ("GDL") welcomes the opportunity to submit on the Christchurch City Council Draft Local Alcohol Policy ("DLAP").
2. GDL supports the objectives of minimising alcohol-related harm in the district and the general use of local alcohol policies as a tool for the Council to assist with the safe consumption of alcohol. However, GDL is opposed to the following aspects of the DLAP:
 - (a) *Reduction in maximum trading hours for off-licences* – Reducing maximum licensed hours by two hours (from 7.00 am – 11.00pm to 7.00 am – 9.00 pm) is a significant change for supermarkets and is not supported by sufficient evidence illustrating this will reduce alcohol-related harm. This change creates unintended consequences including shopper inconvenience and potential investment in cordoning off the single alcohol area if stores trade past the licensed hours, or a risk that licensees might close their stores earlier to be in line with the maximum trading hours for off-licences. GDL would, however, accept 10.00 pm as the maximum trading time in the evening.
 - (b) *Freeze in the issue of new off-licences* – GDL does not consider a freeze for the issue of new off-licences is appropriate for supermarkets and grocery stores given their primary purpose of business is not the sale and supply of alcohol. GDL considers supermarkets and grocery stores should be expressly excluded from this policy and not have to apply for an exemption.
3. GDL wishes to be heard in relation to this submission.

GDL as an off-licence holder

4. GDL is a wholly owned subsidiary of Woolworths and is responsible for operating Woolworths stores nationwide. GDL owns and operates 190 supermarkets under the Woolworths (formally operating as Countdown supermarkets) and Metro banners, and 4 "eStores" across New Zealand. Another subsidiary of Woolworths, Wholesale Distributors Limited, is the franchisor for over 70 SuperValue and FreshChoice supermarkets, which are locally owned and operated businesses.
5. As a holder of over 175 off-licences in New Zealand, GDL is an experienced licence holder and is committed to being a responsible retailer of alcohol. GDL acknowledges that it has a shared responsibility to prevent alcohol-related harm and ensure that consumption of alcohol is undertaken safely and responsibly.

3438-5709-0873

6. GDL holds 12 off-licences for stores located in the Christchurch area. These are Woolworths Avonhead, Belfast, Christchurch Airport, Church Corner, Colombo Street, Eastgate, Ferrymead, Hornby, Moorhouse, New Brighton, Northlands, and The Palms. All of these stores (except Church Corner and Colombo Street which are licensed from 7.00 am – 10.00pm) are currently licensed from 7.00 am – 11.00 pm. While the opening hours for these stores may vary from the licensed hours, it is important these stores have the ability to sell alcohol within the licence of hours as this allows for flexibility during busy periods of the year, such as Christmas, New Years and Easter.

Reduction in maximum trading hours – Policy 5.2

7. Policy 5.2 of the DLAP proposes to reduce the maximum trading hours for all off-licences to Monday to Sunday from 7.00 am – 9.00 pm. GDL does not consider reducing the trading hours by two hours is reasonable or that there is sufficient evidence that it will reduce alcohol-related harm.
8. The proposed change will impact all of GDL's stores and operations. The role of a supermarket is to provide convenient, full-service shopping for customers, including alcohol. This reduction in hours will limit the ability for Woolworths to deliver on these services, causing inconvenience to customers, such as shift workers who sometimes carry out their shopping later at night. The Supreme Court has acknowledged shopper convenience may be material to the assessment of whether a restriction in a LAP is unreasonable considering the object of the Act.¹
9. There is also the potential for a range of unintended consequences of reducing the maximum trading hours by two hours, including:
- (a) As discussed in the Accessing Alcohol in Christchurch report, from a consumer perspective this policy may cause a potential shift of binge drinking to earlier in the day.²
 - (b) If a Woolworths supermarket made the commercial decision to stay open past 9.00 pm, then they would need to cordon off the single alcohol area after 9.00 pm to prevent customers from entering the area and trying to purchase alcohol. This will require additional resources and costs.
 - (c) As outlined in the Local Alcohol Policy Issues and Options Report, there is also a risk that some supermarkets will choose to close early as a result of this policy.³ If a Woolworths supermarket decided to alter the opening hours to align with 9.00 pm, then this would limit accessibility to groceries (other than alcohol) for the community after 9.00 pm.
10. If trading hours are to be reduced, GDL considers 10.00 pm is a more reasonable maximum trading time. A one hour reduction would better align with current trading hours for Woolworths and would not inconvenience the majority of shoppers. This would also align with the maximum trading hours of several other districts, including Tauranga and Dunedin City Councils, and the neighbouring district of Waimakariri.⁴

¹ *Woolworths New Zealand Ltd v Auckland Council* [2023] NZSC 45, [2023] 1 NZLR 113 at [85].

² Accessing Alcohol in Christchurch report at page 8.

³ Local Alcohol Policy Issues and options report at page 11.

⁴ Local Alcohol Policy Issues and options report at page 10.

Relief sought

11. If the Council is minded to reduce the maximum trading hours for off-licences, then GDL considers a 10.00 pm closing time more appropriate. GDL seeks Policy 5.2 of the DLAP be amended as follows (amendments are shown in red underline and deletions are shown in red ~~strikethrough~~):

5 Maximum trading hours for off-licences

[...]

- 5.2 Pursuant to sections 77(1)(e) and 45 of the Act, the maximum trading hours for off-licences in the district are 7.00am to 910.00pm, Monday to Sunday. This policy provision applies to new and existing off-licences.

[...]

Freeze in the issue of new off-licences – Policy 6.3

12. Policy 6.2 of the DLAP proposes to introduce a freeze on the issuing of new off-licences in the areas of high deprivation shown in Appendix 1 to the policy. However, Policy 6.3 allows off-licence holders to apply for an exemption to this policy if the primary purpose of their business is not the sale and supply of alcohol.
13. GDL supports Policy 6.3, which recognises the distinction between different types of off-licences and the services they provide. The primary purpose of supermarkets and grocery stores is by definition not the sale and supply of alcohol, meaning these businesses should uniformly qualify for the proposed exemption in Policy 6.3. Rather than this being determined by way of application, GDL seeks an express exclusion to Policy 6.2.1 for all supermarkets and grocery stores. This will provide certainty and efficiency, saving time and resources in the consideration of non-contentious applications.

Relief sought

14. GDL seeks Policy 6 of the DLAP be amended to include an express exception for supermarkets and grocery stores (amendments are shown in red underline and deletions are shown in red ~~strikethrough~~):

6 Freeze on the issue of new off-licences

[...]

- 6.2 The Council's policy position is that:

6.2.1. there should be a freeze on the issuing of new off-licences (excluding off-licences for supermarkets and grocery stores) in the areas of high deprivation specified and shown in Appendix 1; and

6.2.2. where the freeze applies, the DLC and ARLA should refuse to issue any new off-licences not excluded by Policies 6.2.1 and 6.3.

- 6.3. If an applicant is not already exempt from Policy 6.2, the An applicant can apply for an exemption to this policy provision if they can show in their

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application that the primary purpose of their business is not the sale and supply of alcohol.

[...]

Relief sought

15. GDL respectfully seeks an amendment to:
- (a) Policy 5.2 of the DLAP so that the maximum trading hours for off-licences are 7:00 am to 10:00 pm as set out at paragraph 11 above; and
 - (b) Policies 6.2 and 6.3 of the DLAP to expressly exclude supermarkets and grocery stores from the freeze on new off-licences as set out at paragraph 14 above.

Yours faithfully



Paul Radich

General Distributors Limited

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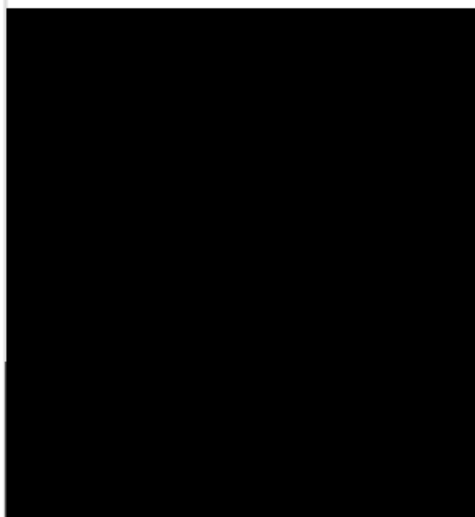
Draft Local Alcohol Policy 2025 from Chong, Marilyn

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 08/05/2025

First Name: (required) Marilyn Last Name: (required) Chong



Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

I also do not support any store or venue selling alcohol in our communities

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

Draft Local Alcohol Policy 2025 from Chong, Marilyn

I support a total freeze on all alcohol sales in New Zealand

Which part of this proposal would you change?

Required question

See above

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

General feedback

Do you have any other comments?

Within the "scoda prophecy" it states everyone involved in the sale of alcohol are accountable for the harm that it causes and will be held in judgement. The bible states leave alcohol alone. It causes so many social and medical issues, driving crimes and family violence. It causes hardship for those on lower incomes and is a cause for some people making unwise choices in their life. Everyone involved in the sale of alcohol are accountable for the harm that it causes.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

The Star Thursday, April 3 2025

10 COURT

Latest Canterbury news at starnews.co.nz

Stranger accused of abducting, raping woman

■ By Al Williams

A YOUNG intoxicated woman was out with friends in the early hours of the morning when a stranger offered her a ride home.

While she declined and was later put in an Uber by a friend, the stranger followed her in his car, picked her up from the roadside and took her to his place, where they had sex.

That stranger, Wiria Mohamadi, doesn't deny following her and picking her up, but he does deny the sex was not consensual, which the woman alleges.

One evening in July 2023, the woman was out late with friends when she hit her head while being ejected from a bar following hours of heavy drinking.

While she struggles to recall all of what happened next, she claims to have been sexually assaulted by Mohamadi at his home.

Mohamadi is now defending charges of abduction for sexual connection, rape and unlawful sexual connection before a jury of eight men and four women in the district court.

In her opening address on Monday, Crown prosecutor Leandra Fiennes said the woman went to numerous bars on the evening of the alleged incident. She had consumed a mix of



PHOTO: GETTY

that she wasn't in the mood."

Fiennes alleged the complainant was not consenting, nor was she in a fit state to consent.

In defence lawyer Arabella Jarman's opening address, she said Mohamadi denied abducting the woman and believed she had consented to sex. Jarman claimed the facts the Crown presented were not the full story and urged the jury not to jump to a decision.

Following the openings, a video of the complainant's interview with police was played to the jury.

She spoke about hitting her head outside the bar.

"The concussion I suffered was quite severe. I don't have a chunk of time; the next memory I have is being naked in a bed with somebody I didn't know. My brain was so scattered. I was lying flat with no clothes on, and he had no clothes on.

"I know we were having sex, and something happened, and I rolled away from them, saying 'I don't want to'."

Crown prosecutor Sean Mallett then questioned the complainant, asking her why she had let Mohamadi drive her home after waking at his house.

She said she just wanted to get home, didn't know how to get home, didn't know where she was and didn't think she had

any other option.

When questioned about the sexual interaction, she said that, at one point, she had told Mohamadi to wear a condom.

She said she was in "auto pilot, in an auto pilot state".

"I wouldn't have been comfortable with unprotected sex. I remember being in a lot of pain.

"I was trying to say 'no' in different ways. I didn't really understand what was going on."

During the cross-examination of the complainant, defence lawyer Kerryn Beaton, KC, asked the complainant at what point she had a clear, uninterrupted memory.

The complainant said it was difficult to say as her head knock had been so bad, she'd had a concussion for six months.

"I think it's impossible to know but I think I was unconscious."

The complainant said she had suffered extreme nausea, headaches and had difficulties facing work for a long time after the incident.

"I am not sure whether I lost consciousness. I remember hitting my head, opening my eyes and seeing the concrete."

The trial continues before Judge Michael Crossbie.

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Latest Canterbury news at starnews.co.nz

Thursday April 3 2025 The Star

NEWS 13

Security guard stood down after street party cut short

By Dylan Smits

A SECURITY guard has been stood down from work after allegations he assaulted patrons of a street party gone wrong. The Yurt Party in New Regent St on Friday, March 21 had hundreds of attendees and was organised by bar Gin Gin.

It was cut short after reports of fighting, in addition to claims the security guard had punched and pushed attendees who were too close to a roped-off drinking area outside Gin Gin.

Principle Protection Services Ltd owner Duncan Fong is appealing for photo or video evidence of the alleged violence. He has stood down the security guard while an investigation is carried out.

"In hearing reports that it wasn't my guy's fault, but also others that it was. The safest thing to do has been to take him off the roster," Fong said.

A Balkan beat-style band only got through a few songs before the event was cancelled.

Gin Gin owner Brett Giddens said 99% of attendees were well behaved.

"There was a small group of people that unfortunately let it down for everyone and led our



SHUT DOWN: The Yurt Party on New Regent St was marred by allegations of violence from attendees and a security guard, which saw the event shut down.

team to the decision to end the event earlier," he said.

An eyewitness told *The Star* the security guard was "shoving" members of the crowd who were standing near the roped-off area. Gin Gin had sectioned off an area of the street where alcohol could be consumed legally.

"All of a sudden the bouncer disappeared and from what I

understand, he all of a sudden started throwing punches at someone in the crowd. It was a bit chaotic," said the witness.

Police received a report at 10.20pm about a group of people fighting at the party.

Police were unable to locate the parties involved in attendance as they had all left the area," said a spokesperson.

Autumn leaves start to blanket the city

THE CRISP feel of autumn is in the air, marking the start of another busy leaf fall season for the city council.

The number of mature deciduous trees in Christchurch sees leaf fall season typically run from April until July.

"With 980 high leaf fall areas, this is one of our busiest times of year with contractors already on the ground making sure footpaths, sunups and gutters are clear," said city council city streets maintenance manager Steve Guy.

"Last year they added new trucks to their fleets including one which grinds leaves as they go, so they can clear more streets before needing to empty a load."

Areas where leaves impact



PHOTO: CCG

stormwater drainage, hinder the growth of underlying plants or compromise safety of pedestrians, cyclists and other road users are prioritised.

"Along with the routine schedule, our contractors are on standby to respond to requests that come through the Contact Centre so if you see a blocked drain or leaves piling up, please report it via the Contact Centre or our Snap Send Solve app," Guy said.

"People can also help reduce build-up by clearing leaves from their berms and gardens and putting them in the green bin."

He urged people not to take leaves up and pile them onto berms as they can't be reached by sweepers and will often just get blown away again.

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HOPPY Deals

Woodsstock 7% 330ml 6pk cans
\$19.99 EACH

Little Number 7% 330ml 12pk cans
\$24.99 EACH

Canadian Club 10% 350ml 6pk cans
\$44.99 EACH

Jack Daniel's & Cola 320ml 12pk (incl 12 330ml cans)
\$34.99 EACH

Woodsstock 7% 330ml cans
\$44.99 EACH

Big B 14% 330ml 6pk cans
\$14.99 EACH

Heineken 14% 330ml 6pk cans
\$20.99 EACH

Festive 7 14% 330ml 6pk cans
\$24.99 EACH

Malibu 14% 330ml 6pk cans
\$25.99 EACH

VB 14% 330ml 6pk cans
\$27.99 EACH

Heil 14% 330ml 6pk cans
\$28.99 EACH

Stieglitz 14% 330ml 6pk cans
\$45.99 EACH

Diageo 7% 330ml 6pk cans
\$17.99 EACH

Centis & Cola 7% 330ml 6pk cans
\$19.99 EACH

Jim Beam Gold / CC 7% 330ml 6pk cans
\$20.99 EACH

Tu Vodka 7% 330ml 6pk cans
\$24.99 EACH

Goat's Cracker 7% 330ml 6pk cans
\$25.99 EACH

Barrel 51 7% 330ml 6pk cans
\$27.99 EACH

Scopagrace 7% 330ml 6pk cans
\$28.99 EACH

Alba 7% 330ml 6pk cans
\$28.99 EACH

Clean Collective 7% 330ml 6pk cans
\$29.99 EACH

Sanitrol 7% 330ml 6pk cans
\$30.99 EACH

Export 33 330ml 6pk cans
\$43.99 EACH

EXCLUSIVE 330ml 6pk cans
\$9.99 EACH

Jack Daniel's 330ml 6pk cans
\$10.99 EACH

Topple Estate 330ml 6pk cans
\$16.99 EACH

Torres Fine Ruby 330ml 6pk cans
\$35.99 EACH

Meat Brat IV 330ml 6pk cans
\$72.99 EACH

Various Original 330ml 6pk cans
\$44.99 EACH

Antinori 330ml 6pk cans
\$46.99 EACH

Carolina 330ml 6pk cans
\$48.99 EACH

Overland 330ml 6pk cans
\$49.99 EACH

Antinori 330ml 6pk cans
\$51.99 EACH

Antinori 330ml 6pk cans
\$53.99 EACH

Antinori 330ml 6pk cans
\$59.99 EACH

Jack Daniel's 330ml 6pk cans
\$62.99 EACH

Antinori 330ml 6pk cans
\$69.99 EACH

Antinori 330ml 6pk cans
\$84.99 EACH

Antinori 330ml 6pk cans
\$99.99 EACH

THIRSTY LIQUOR PAPANUI
495 PAPANUI RD, PAPANUI - 03 260 2380

Promotion period between 1/4/2025 to 30/4/2025. While stocks last. Promotion only available at participating stores - please contact your local store to confirm whether they are participating in the promotion and check the pricing in-store prior to purchase. Online pricing will vary.

Karepa Holdings t/a Frank's Liquor, Misceo Cafe Bar & Restaurant

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Reduction in off-licensed maximum trading hours to 9pm

- 1 Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

☒ Yes ☐ No ☐ I support part of this proposal ☐ I'm not sure

Please tell us why

This is long overdue! It is a well known fact that most alcohol abuse and trouble happens in the later part of the evening.

Allowing members of the community to "top up" after 9pm is fraught with issues - serving intoxicated people, serving people getting alcohol for intoxicated people. Opening those staff serving to be exposed to arguments over no supply, theft + violence.

Place a freeze on new off-licences in high deprivation areas

- 2 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)? Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

☒ Yes ☐ No ☐ I support part of this proposal ☐ I'm not sure

Please tell us why

In the 1980 there were 2,000 licenses over 29 categories. Now there are 11,000 with approximately 3,000 off licenses. The growth of stores/licenses has seen only one way for them to become viable - Price cutting. This method has worked for years - get a site not too far from a successful store and cut price key lines until you have taken half the oppositions customers. Supermarkets are the greatest exponents of price discounting. This "loss leader" used to attract customers into a store & then channel them around/through aisles of product.

Restricting new bottle stores' proximity to sensitive community facilities

- 3 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)?

☒ Yes ☐ No ☐ I support part of this proposal ☐ I'm not sure

Please tell us why

New stores will have an impact on every segment of the market but has the most serious damage on those with fixed and minimum income. Their demographics usually fall into one of these categories: 1/ Alcoholics 2/ Elderly on a pension 3/ Youth 18-25 4/ People on the benefit "benefit day buyers" 5/ Newly married with mortgages & young kids. In other words they target the most vulnerable.

Many liquor chains have been the means to an end - "an NZ visa" and a chance to move to Australia. even had a shame run of this happening via the SuperLiquor Chain & Bin Day.

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- 4 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?

☐ Yes ☐ No ☒ I support part of this proposal ☐ I'm not sure

Please tell us why I think the restrictions should be extended to the whole of CCR. The Four Avenues is too small an area. New suburbs like Rolleston should have been monitored. All suburbs have an element of low density accommodation. Kaiunga One is putting up density buildings, with many single or two bedroom units, and filling them with displaced residents, who are not coping with this style of close community.

- 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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

☐ Yes ☐ No ☒ I support part of this proposal ☐ I'm not sure

Please tell us why These areas need to have each community surveyed, what are the existing options in these towns and are they associated with good community poles or Taverns. For these are often the social hub of the town and add value. Adding new stores to take a share of the pie may cause the long standing outlet to fail and the community is the loser.

General feedback

- 6 Do you have any other comments?

- I ~~will~~ have attached a copy of a submission I prepared for [REDACTED] Chief Alcohol Licensing Inspector. This was in relation to a third liquorstore being opened in Rolleston. You will see duplication of comments above but as discussed on the phone with [REDACTED]. The cost to the community of ignoring whole sale expansion and dominance by supermarkets is not with disaster.
- The LAP should have a limited number of licences available.
If you wish to attach extra paper, please ensure the folded posted item is no thicker than 6mm. Alternatively, you can send your feedback in an envelope of any size and address it using "Freepost Authority No. 178"
- These rules must apply to on-line stores as you are wasting everyone time.



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Karepa Holdings Limited

T/A Frank's wine beer spirits

Cnr Ilam & Clyde Roads, Fendalton

Christchurch. Ph [REDACTED]

Email; - [REDACTED]

frank's
wine beer spirits

[REDACTED]
Chief Alcohol Licensing Inspector

Dear [REDACTED]

RE: Bottle stores in close proximity and their potential issues

Introduction

My name is Frank Pipe and I am the director/owner/operator of Karepa Holdings Limited which trades as **Misceo Café and Bar** and also **Frank's Liquor**.

I have been in hospitality since 1981 and know that it has always been a vital business sector within New Zealand. It plays a key role in providing career opportunities as hospitality venues are core members of communities throughout the country.

I started as an accountant with a major wine and spirit merchant called Fletcher Humphreys Ltd. We merged with Quills Wines & Spirits and my career led me to run a chain of liquor stores throughout New Zealand under the banner of Quills Liquor.

The company grew even larger and become the liquor arm of Magnum and Brierley Investments Ltd. It ran within its group;- Dominion Breweries, Allied Liquor, Liquorland, Robbie Burns, Green Bottle hotel chain, Corban wines, Montana wines, several liquor wholesalers, Keri Orange, Countdown to name a few.

I worked as Group accountant for Liquorland, then South Island Regional Manager and in 1992 purchased a Liquorland store in Fendalton Christchurch now named Frank's Liquor.

In 1995, I built and still operate Misceo Café Bar Restaurant alongside Frank's

1. I am a responsible alcohol retailer, dedicated to delivering the safe and responsible sale and supply of alcohol and a safe and enjoyable retail experience for our customers. I have held an unblemished manager's licence for over 32 years.

Item 4

Attachment A

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2. I am one of the few remaining independent liquor stores that operate in the South Island. I am not controlled or owned by grocery or a national liquor chain.
3. I have been a long standing member of the NZ Hospitality group HANZ.
4. Frank's Liquor (32years) and Misceo (30years) have survived with virtually no advertising other than value for money pricing and exceptional customer service. We do not try to drag people across town with below cost loss leaders. This irresponsible behaviour is dominated by the supermarket chains. (despite it being in breach of the rules set in the Sale of Liquor Act governing their acceptance as liquor retail operators.)
5. I pride myself that neither of my stores have ever breached the Sale and Supply of Alcohol Act.

Responses to your questions:-

Price cutting has been the major method of advertising in my 43 years in the liquor industry.

No other method of advertising works as well as Price Cutting.

It is used to;

- Establish new liquor stores or to encourage smaller operators to leave the industry.
- We used it to establish Quill's Liquor across New Zealand
- We grew Liquorland from 8 stores to over 100 stores
- Supermarkets are the greatest exponents of price discounting. Initially to grow their market share (profit was not a priority) but to undercut the small wine shops which supplied beer and wine to their local communities. There are very few wine shops ethically able to compete.
- Currently price cutting has a new name "loss leader". Used to attract customers into a store and then channel them around the aisles of price and choices.

I feel that price cutting affects every segment of the market but has the most serious damage on those with fixed and minimum income. Their demographics usually fall into one of the categories

1. Alcoholics
2. The elderly on a pension
3. Youth between 18 and 25
4. People on the welfare benefit. You always have them on benefit pay day.
5. Newly married with mortgages

In other words they target the most vulnerable.

Why do supermarkets continually run alcohol as loss leaders and not toilet paper or cheap meat? Because cheap alcohol attracts more people than any other product category.

I am not sure how many supermarkets there are in Rolleston but mark my words "they will lead the price war with cheap beer and wine to retain their market share".

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The applicant states his point of difference will be a bigger selection of top shelf products than the Liquorland stores. We have seen it offered up so many times "We will provide something different" as a reason to allow a liquor licence but time and again it is not delivered.

Unfortunately this is not the reality in the liquor industry. The key brands in every category are generic national or international brands available to everyone. But, at different cost prices dependant on that key factor- Volume.

We have seen stores come and go in Christchurch.
Thirsty Liquor , Canterbury Liquor , Big Daddy

Many of you will remember the price wars between Liquorland and Robbie Burns drove volume which drove market share which drove upstream profit.

Brierley's did this very effectively in the past.

Even in today's market people will travel across town for beer at \$23.99 a dozen or gin at \$37.99.

Today we see the big beer, wine and spirits brands employing hard discounting tactics to compete and hold their brand share mostly done via supermarkets. However, since Foodstuffs have taken over both the Liquorland and Henry's franchises- they are now arguably the strongest player in the liquor industry.

The two Liquorland stores in Rolleston are backed by Foodstuffs and will be in for the price war. In fact they will likely want it to happen. They will make bigger sales, fight over a longer period and get the rebates from the suppliers. That is Easy Money for them and a road to nowhere for Mr Sharma unless selling the store was his ultimate goal – worth considering!

We have seen stores come and go in Christchurch. Thirsty Liquor, Canterbury Liquor, Big Daddy – of late. They each had different reasons for their demise but the inability to compete on price is always the nail in the coffin.

So with supermarkets taking the big beer brands and cheap wine portfolios, what is left for this liquor store. Ready to drink (RTD) and hard liquor spirits.

Yet again, the Liquorland stores have these products and will deep cut them for as long as it takes. The discounting of these will be relished by the price dependant groups until the effects on their cash flow through increased consumption comes home to roost.

When part of a corporate liquor group with stores throughout the country we would monitor all opposition advertising (print, television, internet, store banners) then target these stores with sensitive product. Prices were discounted to cost plus GST with knowledge we would claim a scan back rebate.

To my knowledge this methodology is currently followed in all supermarkets, Super liquor and Liquorland.

Volume is the key to survival. Foodstuffs take a 4 % margin along with advertising paid for by the suppliers. Thus they have a huge advantage over new competitors who have less buying power or relationships with suppliers.

I do not know much about SSP Enterprises Limited or the Black Bull Liquor group but have looked at the website of their flag ship store in Porirua. I reviewed both the spirit and wine categories as these would be those likely to have the top shelf products which would make them different from the Liquorland stores.

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Item 4

Attachment A

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I found the brands in both categories to be underwhelming and not offering anything different from the hundreds of liquor stores across New Zealand. In fact I found them to be generic and common place price fighters.

Even if Mr Sharma were to source different high end products, my experience would say that they would make up less than two percent of the sales.

Other defunct stores have employed staff who were new to the industry with little product knowledge and poor wage remuneration.

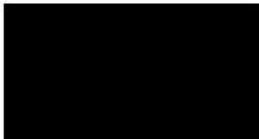
Good product knowledge is a prerequisite to selling high end wines and spirits.

Staff need to be from the local area especially if you as owner are not present. Someone needs to show a sense of ownership and genuine connection with the community resulting in social integrity. This is crucial.

I would suggest their employment policy be put under the spotlight.

Given the current recession and marked decrease in discretionary dollar I can see this site being the catalyst for the panacea called Price discounting. It would be Mr Sharma's only course of action which in my opinion would bring more harm than good to an already vulnerable community.

Yours faithfully



Frank Davidson Pipe
Karepa Holdings Limited t/a **Frank's** Liquor and **Misceo** Café Bar Restaurant



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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Richard Last Name: (required) Peebles

Please provide the organisation name:
(required)

Peebles Group Ltd

Your role and the number of people your
organisation represents: (required)

CEO 12

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

No

Please tell us why you don't support this proposal:

Reducing hours by 2 hours will have no measurable effect on alcohol harm. Increases cost to businesses such as supermarkets and stops people from having choice to buy a bottle of wine at 9.05pm purely because of CCC insistence to involve themselves in rules and regulations to impinge of people's lives and freedom of choice.

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

No

Please tell us why you don't support this proposal:

CCC need to keep out of this entirely. Just arbitrary distances and areas. Impinges of people's choice. Also assumes people in some areas are unable to make their own decisions.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

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(Required question - you will not be able to submit without selecting a response)

No

Please tell us why you don't support this proposal:
as above

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

No

Please tell us why you don't support this proposal:
as above

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

No

Please tell us why you don't support this proposal:
as above

General feedback

Do you have any other comments?

CCC should not have bothered, tinkering and wasteful for no measurable effect.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

388

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 17/05/2025

First Name: (required) Ruth Last Name: (required) Spearing

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

I support reducing the off licence trading hours to 9pm.

There is strong international evidence that shows changes in hours of sale of alcohol have a significant impact on the volume of alcohol consumed with all its downstream issues. (see especially papers by Professor Peter Miller)

Which part of this proposal would you change?

Required question

The opening hours for off licences should be also changed to 9am. This would inconvenience only a small number of people but would reduce the sale of alcohol to heavy drinkers who are reported by supermarket workers to frequent the alcohol isles early in the morning.

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

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Required question

I strongly support the freeze on new licences in deciles 8-10

Which part of this proposal would you change?

Required question

However, I would urge the Council to include decile 7 as well. The Council's data shows that quintile 4 has the highest number of alcohol outlets and so only freezing the new licences to 8-10 may actually increase the number of outlets further in quintile 4.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

I support the restriction of the bottle stores from within 200m of schools and addictions/rehabilitation centres outside of the 4 avenues

Which part of this proposal would you change?

Required question

However, outside the 4 avenues this should also include bars and night clubs, and within the 4 avenues it should include bottle stores.

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

I 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)

Which part of this proposal would you change?

Required question

I would include the Central City Zone from having new liquor stores opening as unlike bars and night clubs bottle store do not add to the vitality of a city but instead decreases the income of venues such as nightclubs and bars, and encourages unsupervised drinking on the street with the increased violence associated with this and the downstream pressure on ED etc.

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Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

Because there is good international evidence that alcohol outlets influences young people to drink.

General feedback

Do you have any other comments?

I would like to see the sale of alcohol at all venues reduced to 2 am. This would be in keeping with the policies of many of the vibrant cities internationally and the work of Professor Peter Miller has shown that one of the best ways to reduce alcohol harm is to reduce the hours that the hours that venues can sell alcohol.

The cost of the dealing with the harm of excess alcohol impacts on the lies of all of us. - whether it is as a result of the over burdening of the ED services or the cost to the country of the increase in number of cancer and gastroenterology patients needing to be treated., or the lifelong impact of foetal alcohol syndrome resulting from a 'good night out' The recommendations I have suggested are in keeping with many vibrant cities across the world and I would urge the Council to go just a bit further than what it has put forward.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Alcohol and Cancer Risk Nature Nature 639, 290-292 2025
Addiction - 2020 - Connor - Changes in the incidence of assault after restrictions on late-night alcohol sales in NZ
Addiction - 2020 v116p788-798
Role of alcohol in maxillofacial fractures - Chch Experince NZ Med J

Alcohol and cancer risk: what you need to know

Experts weigh in on the risks of moderate drinking – and how people should assess them.

By

- [Helen Pearson](#) *Nature* **639**, 290-292 (2025)
- doi: <https://doi.org/10.1038/d41586-025-00729-5>
-



For decades, scientists have been collecting evidence that alcohol causes cancer. Credit: Marissa Alper/The New York Times/Redux/eyevine

Early this year, the US surgeon general issued a bombshell report. Before his term ended in January, Vivek Murthy warned that c and called for alcoholic drinks to carry cancer warning labels as cigarette packs do. The report¹ triggered a flurry of headlines about a risk that many people ignore.

The link between alcohol and cancer is not new. Scientists first labelled alcohol as a carcinogen more than 35 years ago, and the evidence has only grown since. "I don't think the relationship between alcohol and certain cancers is terribly controversial," says Tim Naimi, an alcohol epidemiologist at the University of Victoria, Canada.

What has been less clear is the level of drinking at which cancer risk starts to rise, and how to weigh that elevated risk against alcohol's other impacts – in particular, the fiercely debated claim that low or moderate drinking improves heart health for some people. "Drinking a lot is absolutely bad," says Emmanuela Gakidou, who analyses alcohol risks at the Institute for Health Metrics and Evaluation in Seattle, Washington. "It's the low-to-moderate amount of alcohol where the debate is."

All this information can leave people feeling confused. What exactly is low or moderate drinking? And how should people [weigh up any enjoyment](#) they might get from drinking with the risks? "A lot of people enjoy drinking, and they don't like to be told that something they really enjoy is bad for you," Gakidou says.

The cancer connection

For decades, scientists have been building a case that alcohol causes cancer. Because testing alcohol's effects in randomized trials is difficult, they have instead drawn on other types of research. Several huge cohort studies that track many tens of thousands of people have found that alcohol is linked to higher rates of some types of cancers.



Why are so many young people getting cancer? What the data say

But cohort studies have weaknesses. Researchers have to control for other confounding factors that could contribute to cancer risk, such as the fact that heavy drinkers are more likely to smoke than those who drink less, and people who drink small amounts of alcohol tend to have other healthy habits. And scientists know that study participants often say they drink less than they really do. Some studies attempt to adjust for this by inflating the levels of drinking to match those expected from alcohol sales, says Peter Sarich, an epidemiologist at the Daffodil Centre, a cancer research centre in Sydney, Australia.

Other evidence comes from animal experiments and from laboratory studies that have identified mechanisms by which alcohol can cause cancer. The most well-established is that ethanol is broken down into acetaldehyde, a toxin that damages DNA.

Scientists like to look at the sum of evidence, and there are two syntheses of research that are considered particularly definitive for alcohol and cancer. One is from the International Agency for Research on Cancer (IARC), the World Health Organization's cancer branch. The

agency classed drinking alcohol as carcinogenic to humans in 1988 – putting it in the same category as tobacco smoke and asbestos – and restated that view³ in 2007.

The other synthesis is from the Global Cancer Update Programme, a continuing effort to assess the totality of evidence on links between cancer, physical activity, [body weight](#) and diet (including alcohol) using systematic reviews and a panel of specialists to assess the strength of the evidence. The programme's most recent report⁴, in 2018, concluded that there is strong evidence that alcoholic drinks increase the risk of several cancers.

"Because we have such a rigorous process, people have got confidence in the outcomes," says Helen Croker, assistant director of research and policy at the World Cancer Research Fund International (WCRF) in London, which runs the project with several other cancer-research charities.

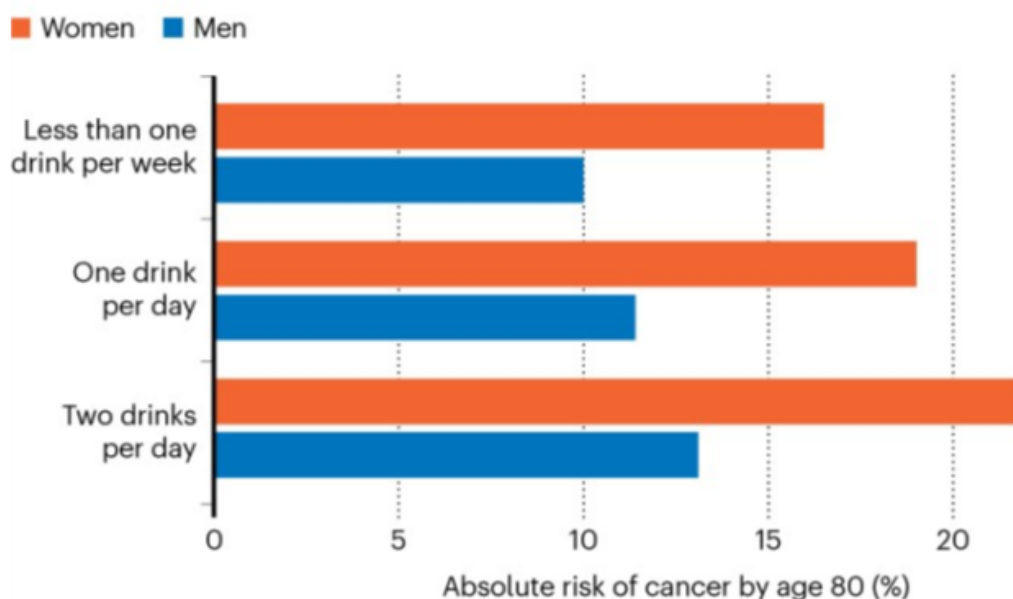
On the basis of such syntheses, researchers agree that alcohol increases the risk of at least seven types of cancer: mouth, throat (pharynx), voice box (larynx), oesophagus, [breast cancer in women](#), colorectal and liver. Scientists suspect that other cancer types will be added as more data are collected.

Studies present this risk in different ways. One complication is that, in alcohol studies and guidelines, the amount of alcohol in a 'standard' drink differs between countries: a standard drink in the United States contains 14 grams of ethanol, in Canada it holds 13.45 g, in Australia 10 g and the in United Kingdom 8 g.

In the surgeon general's report, the results from a large cohort study⁵ led by Sarich were used to calculate the absolute risks of developing any of the seven cancer types above (see 'Cancer risk goes up'). This showed that around 17 out of 100 women who drink either nothing or less than one standard US drink per week (14 g ethanol) would develop such a cancer in their lifetime. This was taken as the baseline level of risk. This number rose to nearly 22 out of 100 in women who have two drinks per day (28 g ethanol) on average. Therefore, five more women would develop cancer owing to the higher level of alcohol consumption.

CANCER RISK GOES UP

People who consume one or two standard US drinks per day (14 or 28 grams of ethanol) are at an increased risk of developing alcohol-related cancers, which include breast, colorectal, oesophageal, liver, mouth, throat and voice-box cancers, compared with those who consume less than one drink a week.



©nature

Source: Ref. 1

For men, the lifetime risk of developing one of these seven cancer types rose from a baseline of about 10 in 100 for those who don't drink or have less than one standard drink per week, to about 13 out of 100 for those who, on average, have two drinks daily. The sex difference is because breast cancers account for a large number of cancers that are attributable to alcohol in women but not in men.

Rising risks

But what about people who drink very little? In the past few years, scientists have been zeroing in on the level of drinking at which cancer risk starts to rise. "We suspect that this question may have different answers for different cancer types," says Jürgen Rehm, who studies the harms of alcohol and drugs at the Centre for Addiction and Mental Health in Toronto, Canada.

Rehm says the answer is clearest for breast cancer in women thanks in part to several large cohort studies that included many people who didn't drink much. A systematic review⁶ of such studies, which was published last year, found that cancer risks were raised slightly in those who had half a drink (5 g of ethanol) per day – the lowest level examined. "And frankly,

it probably doesn't make a lot of sense to go down further, because I mean, who drinks one-quarter of a drink?" says Rehm.



Almost half of cancer deaths are preventable

In the 2018 Global Cancer Update Programme report⁴, the panel concluded that any amount of alcohol increased the risk of mouth, pharynx, larynx, oesophageal and breast cancer. For these conditions, "we find no lower threshold", Croker says. The WCRF's position, which is similar to that of the World Health Organization, is that there is no 'safe' level that does not increase overall cancer risk.

For some other cancer types, the panel found that elevated risks were most apparent at slightly greater levels of alcohol consumption. The risks of [colorectal cancer](#) increased above 30 g of ethanol per day (more than two US standard drinks), and liver cancer risks increased above 45 g per day (more than three US standard drinks). Lower levels of alcohol might still increase the risk of developing these cancers, but there wasn't enough evidence to say.

The risks from low or moderate drinking can be hard to discern, partly because it is difficult for studies to define a reliable comparison group of people who don't drink. Scientists know that some people stop drinking alcohol because their health is already declining: what researchers call sick-quitters. And some claim to be lifetime abstainers when records show they did drink in the past, says Naimi. Therefore, the 'non-drinking' group in a study might include unhealthy former drinkers.

"The whole evidence base around moderate drinking is scientifically frail – and that would be a charitable characterization," Naimi says.

Alcohol versus smoking

A few years ago, Nick Sheron, a liver physician working at the University of Southampton, UK, did a quick calculation on the comparative risks of drinking and smoking. He said he was so surprised by the result that "I spent a long time trying to prove that I was wrong". But he couldn't – and epidemiologists he worked with agreed the numbers were right.

The study⁷ they published, in 2019, estimated that for non-smokers, drinking one bottle of wine per week was associated with an increased absolute lifetime cancer risk of 1% for men and 1.4% for women. (So, if 1,000 men and 1,000 women consumed a bottle of wine each week, an estimated 10 men and 14 women would develop cancer as a consequence.) This,

they found, was equivalent to men smoking five cigarettes per week and women smoking ten. (Drinking three bottles per week was equivalent to men smoking eight cigarettes and women smoking 23 – more than a pack.)



This wine bottle from 2018 includes alcohol recommendations from the UK chief medical officers. Some countries have considered adding alcohol warning labels that highlight cancer risk. Credit: Carolyn Jenkins/Alamy

w York Times/Redux/eyevine

Early this year, the US surgeon general issued a bombshell report. Before his term ended in January, Vivek Murthy warned that alcohol increases the risk of at least seven types of cancer and called for alcoholic drinks to carry cancer warning labels as cigarette packs do. The report¹ triggered a flurry of headlines about a risk that many people ignore.

The link between alcohol and cancer is not new. Scientists first labelled alcohol as a carcinogen more than 35 years ago, and the evidence has only grown since. "I don't think the relationship between alcohol and certain cancers is terribly controversial," says Tim Naimi, an alcohol epidemiologist at the University of Victoria, Canada.

What has been less clear is the level of drinking at which cancer risk starts to rise, and how to weigh that elevated risk against alcohol's other impacts – in particular, the fiercely debated claim that low or moderate drinking improves heart health for some people. "Drinking a lot is absolutely bad," says Emmanuela Gakidou, who analyses alcohol risks at the Institute for

Health Metrics and Evaluation in Seattle, Washington. "It's the low-to-moderate amount of alcohol where the debate is."

All this information can leave people feeling confused. What exactly is low or moderate drinking? And how should people [weigh up any enjoyment](#) they might get from drinking with the risks? "A lot of people enjoy drinking, and they don't like to be told that something they really enjoy is bad for you," Gakidou says.

The cancer connection

For decades, scientists have been building a case that alcohol causes cancer. Because testing alcohol's effects in randomized trials is difficult, they have instead drawn on other types of research. Several huge cohort studies that track many tens of thousands of people have found that alcohol is linked to higher rates of some types of cancer. One massive 2015 meta-analysis² – which pooled the results of hundreds of cohort studies and other research, including more than 485,000 cancer cases – found that risks of developing several cancers rose with the level of consumption.



[Why are so many young people getting cancer? What the data say](#)

But cohort studies have weaknesses. Researchers have to control for other confounding factors that could contribute to cancer risk, such as the fact that heavy drinkers are more likely to smoke than those who drink less, and people who drink small amounts of alcohol tend to have other healthy habits. And scientists know that study participants often say they drink less than they really do. Some studies attempt to adjust for this by inflating the levels of drinking to match those expected from alcohol sales, says Peter Sarich, an epidemiologist at the Daffodil Centre, a cancer research centre in Sydney, Australia.

Other evidence comes from animal experiments and from laboratory studies that have identified mechanisms by which alcohol can cause cancer. The most well-established is that ethanol is broken down into acetaldehyde, a toxin that damages DNA.

Scientists like to look at the sum of evidence, and there are two syntheses of research that are considered particularly definitive for alcohol and cancer. One is from the International Agency for Research on Cancer (IARC), the World Health Organization's cancer branch. The

agency classed drinking alcohol as carcinogenic to humans in 1988 – putting it in the same category as tobacco smoke and asbestos – and restated that view³ in 2007.

The other synthesis is from the Global Cancer Update Programme, a continuing effort to assess the totality of evidence on links between cancer, physical activity, [body weight](#) and diet (including alcohol) using systematic reviews and a panel of specialists to assess the strength of the evidence. The programme's most recent report⁴, in 2018, concluded that there is strong evidence that alcoholic drinks increase the risk of several cancers.

"Because we have such a rigorous process, people have got confidence in the outcomes," says Helen Croker, assistant director of research and policy at the World Cancer Research Fund International (WCRF) in London, which runs the project with several other cancer-research charities.

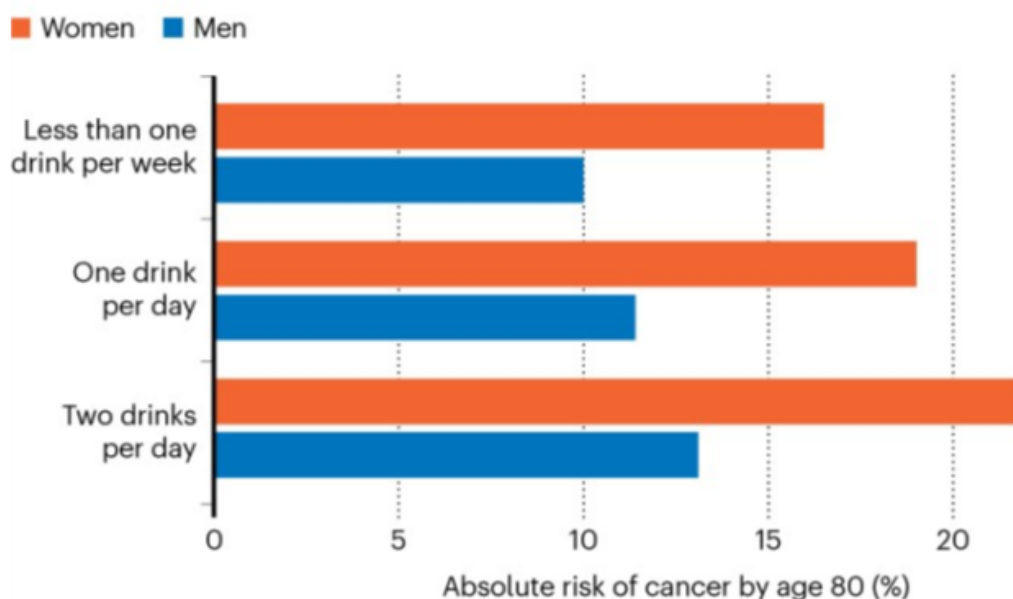
On the basis of such syntheses, researchers agree that alcohol increases the risk of at least seven types of cancer: mouth, throat (pharynx), voice box (larynx), oesophagus, [breast cancer in women](#), colorectal and liver. Scientists suspect that other cancer types will be added as more data are collected.

Studies present this risk in different ways. One complication is that, in alcohol studies and guidelines, the amount of alcohol in a 'standard' drink differs between countries: a standard drink in the United States contains 14 grams of ethanol, in Canada it holds 13.45 g, in Australia 10 g and the in United Kingdom 8 g.

In the surgeon general's report, the results from a large cohort study⁵ led by Sarich were used to calculate the absolute risks of developing any of the seven cancer types above (see 'Cancer risk goes up'). This showed that around 17 out of 100 women who drink either nothing or less than one standard US drink per week (14 g ethanol) would develop such a cancer in their lifetime. This was taken as the baseline level of risk. This number rose to nearly 22 out of 100 in women who have two drinks per day (28 g ethanol) on average. Therefore, five more women would develop cancer owing to the higher level of alcohol consumption.

CANCER RISK GOES UP

People who consume one or two standard US drinks per day (14 or 28 grams of ethanol) are at an increased risk of developing alcohol-related cancers, which include breast, colorectal, oesophageal, liver, mouth, throat and voice-box cancers, compared with those who consume less than one drink a week.



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Source: Ref. 1

For men, the lifetime risk of developing one of these seven cancer types rose from a baseline of about 10 in 100 for those who don't drink or have less than one standard drink per week, to about 13 out of 100 for those who, on average, have two drinks daily. The sex difference is because breast cancers account for a large number of cancers that are attributable to alcohol in women but not in men.

Rising risks

But what about people who drink very little? In the past few years, scientists have been zeroing in on the level of drinking at which cancer risk starts to rise. "We suspect that this question may have different answers for different cancer types," says Jürgen Rehm, who studies the harms of alcohol and drugs at the Centre for Addiction and Mental Health in Toronto, Canada.

Rehm says the answer is clearest for breast cancer in women thanks in part to several large cohort studies that included many people who didn't drink much. A systematic review⁶ of such studies, which was published last year, found that cancer risks were raised slightly in those who had half a drink (5 g of ethanol) per day – the lowest level examined. "And frankly,

it probably doesn't make a lot of sense to go down further, because I mean, who drinks one-quarter of a drink?" says Rehm.



Almost half of cancer deaths are preventable

In the 2018 Global Cancer Update Programme report⁴, the panel concluded that any amount of alcohol increased the risk of mouth, pharynx, larynx, oesophageal and breast cancer. For these conditions, "we find no lower threshold", Croker says. The WCRF's position, which is similar to that of the World Health Organization, is that there is no 'safe' level that does not increase overall cancer risk.

For some other cancer types, the panel found that elevated risks were most apparent at slightly greater levels of alcohol consumption. The risks of [colorectal cancer](#) increased above 30 g of ethanol per day (more than two US standard drinks), and liver cancer risks increased above 45 g per day (more than three US standard drinks). Lower levels of alcohol might still increase the risk of developing these cancers, but there wasn't enough evidence to say.

The risks from low or moderate drinking can be hard to discern, partly because it is difficult for studies to define a reliable comparison group of people who don't drink. Scientists know that some people stop drinking alcohol because their health is already declining: what researchers call sick-quitters. And some claim to be lifetime abstainers when records show they did drink in the past, says Naimi. Therefore, the 'non-drinking' group in a study might include unhealthy former drinkers.

"The whole evidence base around moderate drinking is scientifically frail – and that would be a charitable characterization," Naimi says.

Alcohol versus smoking

A few years ago, Nick Sheron, a liver physician working at the University of Southampton, UK, did a quick calculation on the comparative risks of drinking and smoking. He said he was so surprised by the result that "I spent a long time trying to prove that I was wrong". But he couldn't – and epidemiologists he worked with agreed the numbers were right.

The study⁷ they published, in 2019, estimated that for non-smokers, drinking one bottle of wine per week was associated with an increased absolute lifetime cancer risk of 1% for men and 1.4% for women. (So, if 1,000 men and 1,000 women consumed a bottle of wine each week, an estimated 10 men and 14 women would develop cancer as a consequence.) This,

they found, was equivalent to men smoking five cigarettes per week and women smoking ten. (Drinking three bottles per week was equivalent to men smoking eight cigarettes and women smoking 23 – more than a pack.)



This wine bottle from 2018 includes alcohol recommendations from the UK chief medical officers. Some countries have considered adding alcohol warning labels that highlight cancer risk. Credit: Carolyn Jenkins/Alamy

Nature **639**, 290-292 (2025)

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Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data

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ABSTRACT

Aims To estimate the effect of national restrictions on late-night availability of alcohol on alcohol-related assault at a population level as indicated by (1) change in hospitalizations for weekend assaults and (2) change in the proportion of assaults documented by police that occur at night. **Design** Evaluation of a natural experiment, involving: (1) pre-post comparisons of age-specific incidence rates, adjusted for seasonality and background trend using Poisson regression; and (2) interrupted time-series analyses, using seasonal autoregressive integrated moving average (SARIMA) models of national data with no control site. **Setting** New Zealand. **Participants** (1) Inpatients discharged from NZ hospitals following assault during the weekend (Friday–Sunday) from 2004 to 2016 ($n = 14996$) and (2) cases of assault recorded by NZ Police from 2012 to 2018. **Intervention** introduction of national maximum trading hours for all on-licence (8 a.m.–4 a.m.) and off-licence premises (7 a.m.–11 p.m.), abolishing existing 24-hour licences, on 18 December 2013. **Measurements** (1) Age-specific incidence of hospitalization for assault on Friday, Saturday or Sunday from the national hospital discharge data set, excluding short-stay emergency department admissions and (2) proportion of weekly police-documented assaults occurring between 9 p.m. and 5.59 a.m., from NZ Police Demand and Activity data set. **Findings** Following the restrictions, weekend hospitalized assaults declined by 11% [incidence rate ratio (IRR) = 0.89; 95% confidence interval (CI) = 0.84, 0.94], with the greatest reduction among 15–29-year-olds (IRR = 0.82; 95% CI = 0.76, 0.89). There was an absolute reduction (step change) of 1.8% (95% CI = 0.2, 3.5%) in the proportion of police-documented assaults occurring at night, equivalent to 9.70 (95% CI = 0.10, 19.30) fewer night-time assaults per week, out of 207.4. **Conclusions** The 2013 implementation of national maximum trading hours for alcohol in NZ was followed by reductions in two complementary indicators of alcohol-related assault, consistent with beneficial effects of modest nation-wide restrictions on the late-night availability of alcohol.

Keywords Alcohol, assault, availability, legislation, natural experiment, restriction, trading hours.

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INTRODUCTION

Alcohol consumption is a leading contributor to the global burden of disease, killing 3 million people per year [1], despite the fact that only a third of people drink [2]. If transnational corporations continue developing alcohol markets in low- and middle income countries, global health losses will balloon this century. Evidence on the effects of major policy changes may guide decision-makers in countries

with long-standing alcohol problems, and in countries whose prevalence of drinking is currently low [3]. Here we study a 'natural experiment' of alcohol policy changes in New Zealand [4].

New Zealand's per capita alcohol consumption is approximately 10.7 litres [5]. The prevalence of hazardous drinking (AUDIT score > 8) is highest in 18–24-year-old men (45%) and 25–34-year-old men (34%) [6, 7], and the burden of alcohol-related disease is greatest for

Māori (New Zealand's indigenous people) and lower socio-economic groups [6–8].

As in many high-income countries, New Zealand deregulated alcohol markets in the 1980s and 1990s, resulting in a proliferation of outlets, greater competition, more discounting and promotion [9] and significant harm to the population [10–12]. In response to public concern, particularly about violence [13], the government commissioned an independent review, and in 2010 the Law Commission recommended major reforms [14]. On 18 December 2013, the Sale and Supply of Alcohol Act 2012 (SSAA) introduced: (1) a process for local governments to develop local alcohol policies (LAPs); (2) maximum trading hours for all on-licence (8 a.m.–4 a.m.) and off-licence premises (7 a.m.–11 p.m.), abolishing 24-hour licences; (3) new offences of irresponsible alcohol advertising or promotion, and of supplying alcohol to a person aged under 18 years without parental consent. Phasing-out licences for small grocery stores and restricting alcohol displays in supermarkets occurred on the issuing or renewal of a licence during the following 3 years [15].

Few LAPs were implemented during the first 3 years due to appeals by supermarkets and other large off-licence retailers [16]. A study of the SSAA's impact on the alcohol environment from 2013 to 2015 found: 'No impact on number of premises, supply to minors or marketing was identified' [17]. Therefore, the main changes to alcohol availability implemented on 18 December 2013 were reductions in trading hours of on-licence premises beyond 4 a.m. and off-licence premises that had operated after 11 p.m. or before 7 a.m. [17]. Outlets already operating with shorter hours remained bound by their existing licence. A survey estimated that 1% of alcohol shops, 9% of supermarkets and 6% of bars and nightclubs would close earlier [18].

A recent systematic review of 22 studies employing controlled designs to examine the effects of changes in alcohol trading hours concluded that: 'harm typically increases after extensions in on-licence alcohol trading hours... and... decreases when on- and off-licence trading

hours are restricted' [19]. Only seven studies examined restrictions and none were of changes in national policies, making this New Zealand policy change a potentially valuable natural experiment, albeit one without a contemporaneously unexposed control area.

As part of a wider evaluation of the law changes [20], we developed hypotheses about how the changes in the new maximum trading hours would affect measurable outcomes (Fig. 1), as indicated by (1) age-specific changes in weekend hospitalizations for assault and (2) change in night-time assaults documented by police.

METHODS

Registration

We presented an evaluation plan at the outset of this research project [20] but did not pre-specify the analyses. Accordingly, as per this journal's guidelines, we advise readers to view the results as exploratory.

Design

We designed this study to estimate the association between the 18 December 2013 law change and two temporal surrogates for alcohol-related assault: (1) hospitalized weekend assaults and (2) police-documented night-time assaults. We used Poisson regression to calculate incidence rate ratios (IRRs) pre- and post-intervention for the first outcome. For the second, we employed an interrupted time-series design and the seasonal autoregressive integrated moving average (SARIMA) model [21]. To test the robustness of the results, we performed sensitivity analyses.

Ascertaining whether alcohol contributes to specific assaults is impossible in New Zealand's routine data, as hospital records [22] and police reports [23] lack reliable indicators of alcohol involvement, and the person identified may not have been the perpetrator. We therefore restricted the outcomes to those occurring at times when they are likely to involve alcohol [24]. NZ police audits estimate that 75% of assaults after 9 p.m. are alcohol-related [25]. Any

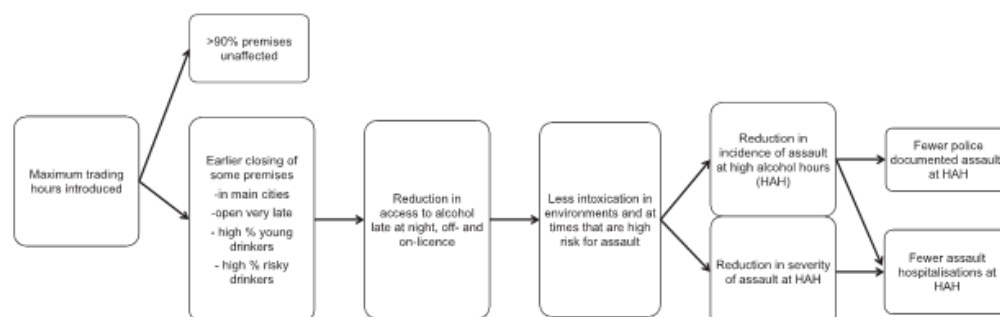


Figure 1 Potential effect of maximum trading hours provisions on police-documented assaults and hospitalized weekend assaults

lack of specificity in these indicators (i.e. from including assaults that are not alcohol-related) would bias estimates towards the null because assaults unrelated to alcohol would be unaffected by changes in alcohol availability, thereby underestimating the true association.

As the legislation was national, there was no contemporaneously unexposed area. Using the proportion of assaults occurring at night as the primary measure from police reports, rather than the incidence of night-time assaults, provides some control for potential confounders that affect all assaults (e.g. changes in police numbers). To increase confidence in our pre-post comparisons, we performed temporal falsification tests [26] for the interrupted time-series analysis of police data, and modelled a substitute outcome for hospitalizations [4].

Data

For the first outcome, we used New Zealand's National Minimum Data Set (NMDS) of hospital discharges from mid-2004 to mid-2016 (9.5 years pre- and 2.5 years post-intervention). NMDS inclusion is mandatory for publicly funded inpatient treatment in New Zealand hospitals [27]. As recommended by the Ministry of Health classification, we excluded short-stay emergency department discharges, whose counts can vary according to coding practices [28], and we excluded re-admissions for the same injury event to avoid double counting [29].

For the second outcome we used weekly counts from the New Zealand police demand and activity data set for 2012–18 (76 weeks pre- and 216 weeks post-intervention) of events involving assault recorded by police nationally [24]. Our primary analysis focused on night-time assaults (9 p.m.–5.59 a.m.) as a proportion of all assaults.

Measures

Criterion variables

For hospitalized weekend assaults, we defined cases as discharges with first-listed external cause of injury codes X85–Y09 or Y871, hospitalized within 2 weeks of the injury regardless of length of stay [30]. The NMDS does not specify the time of injury, so we included all hospital discharges for 'weekend' assaults (occurring on Friday, Saturday or Sunday) and calculated incidence rates per 100 000 person-years.

For the police data, we used the 'all assaults' category, comprising common assault, serious assault, other acts intended to cause violence and male assaults female. We calculated the proportion of all assaults that occurred at night (9 p.m.–5.59 a.m.) by week for the primary outcome and the ratio of night-time to daytime assaults as sensitivity analysis.

Intervention

The intervention date was 18 December 2013. For hospitalized weekend assaults, we coded a dummy variable as '0' for 19 June 2004 to 18 December 2013 or '1' for 19 December 2013 to 18 June 2016. For police assaults, we coded a dummy variable as '0' for 1 July 2012 to 18 December 2013 and '1' for 19 December 2013 to 31 January 2018.

Age groups

We categorized hospital patients as 0–14, 15–29, 30–49, 50–69 or 70+ years of age. The police data set contained no age data.

Statistical methods

Hospitalized weekend assaults

We calculated incidence rates per 100 000 person-years for pre- and post-change periods, using mid-year estimates of 'usually resident' populations as denominators [31]. Where Territorial Authorities (TAs) had a LAP in place before 18 June 2016 we removed cases from the numerator and corresponding populations from the denominator. To adjust for season, we computed 3-monthly rates, using linear interpolation to derive quarterly denominators from annual population estimates.

Using Poisson regression we calculated incidence rate ratios (IRRs) with 95% confidence intervals (CI) for each age group and overall. We adjusted IRRs for seasonality and secular trend by including categorical variables designating quarters (1–4) and a continuous variable counting the quarters from 1 (19 June 2004 to 18 December 2004) to 48 (19 March 2016 to 18 June 2016).

On examining all 67 TAs, we identified three with no LAP in place (Hamilton, Nelson, Christchurch), that bordered TAs with LAPs and were likely to have some residents drinking in the bordering TA admitted to their city hospital. To test the sensitivity of our comparison to such misclassification, we replicated the analysis excluding those three TAs.

Proportion of assaults occurring at night

We first calculated the prevalence ratio, before and after the restrictions. To adjust for seasonality and background trend in the data, we used SARIMA models to estimate the association between the implementation of the restrictions on 18 December 2013 and the proportion of assaults occurring at night. Given that this was a permanent/continuous intervention, the intervention models tested for abrupt permanent change, where the overall mean of the time series is shifted after the intervention (a 'step change') and gradual permanent association, where the change after the intervention is gradual, and

the final permanent impact occurs after a lag (a 'slope change'). We fitted the following model:

$$Y_t = v(B)I_t + \frac{1}{(1-B)(1-B^s)} \frac{\theta(B)}{\phi(B)} a_t,$$

where Y_t is the weekly proportion of night-time assaults at time t , B is the backshift operator, I_t is the dummy variable taking the value '1' during the intervention period and '0' otherwise, s is the order of the seasonal part, $\theta(B)$ is the moving-average operator, $\phi(B)$ is the autoregressive operator and a_t the random error. The term $v(B)$ corresponds to the transfer function which is given by ω_0 or $\frac{\omega_0}{1-\delta_1}$

which incorporates an abrupt permanent change or a gradual permanent association in the model. The gradual permanent association model encompasses the abrupt one (the latter is a particular case of the former when denominator factor is $\delta_1 = 0$). First, we fitted the gradual one, and if the denominator factor was not significant we fitted the model containing only the post-period effect ω_0 .

We observed a seasonal pattern (every 52 weeks) and downward trend in the data. Seasonality, autocorrelation, lags and correct specification of the model residuals were assessed using autocorrelation (ACF), partial autocorrelation functions (PACF) and Ljung-Box tests for 'white noise'. We designated the input variable in the post-change period as a continuing intervention. We implemented SARIMA models using *proc arima* in SAS version 9.4.

To address the possibility that the results were sensitive to the measure of occurrence that we used, we repeated the main analysis using ratios of night-time to daytime assaults, i.e. the odds that an assault occurred at night, in place of proportions of assaults that occurred at night.

Falsification tests

To increase confidence in our uncontrolled time-series analysis, we performed temporal falsification tests. Following De Vocht *et al.* [26], we used dummy intervention dates 6 months earlier (18 June 2013) and 6 months later (18 June 2014), on the premise that changes in outcome should not be associated with those dates. For the Poisson regression analysis, temporal falsification was not a coherent strategy, so we tested for association with an injury outcome expected to be unaffected by the intervention; namely, 'overexertion or strenuous movements or postures' (external cause code X50).

RESULTS

Change in hospitalized weekend assaults

Figure 2 shows the annual incidence of hospitalized assault by age group from 2004 to 2016. In the 15–29-year-olds there was an obvious reduction in hospitalization between 2013 and 2014, and fewer marked reductions in most other age groups.

Table 1 presents age-specific incidence rates for hospitalized weekend assaults, before and after the restrictions. The primary analysis estimated an adjusted IRR of 0.89 (95% CI = 0.84, 0.94) for the post-change period compared to the pre-change period including all age groups in the 53 eligible TAs. Reductions were largest among 15–29-year-olds (IRR = 0.82; 95% CI = 0.76, 0.89) and there was a large relative reduction in the oldest age group in the adjusted model. The sensitivity analysis excluding TAs with potential for cross-boundary effects produced similar results.

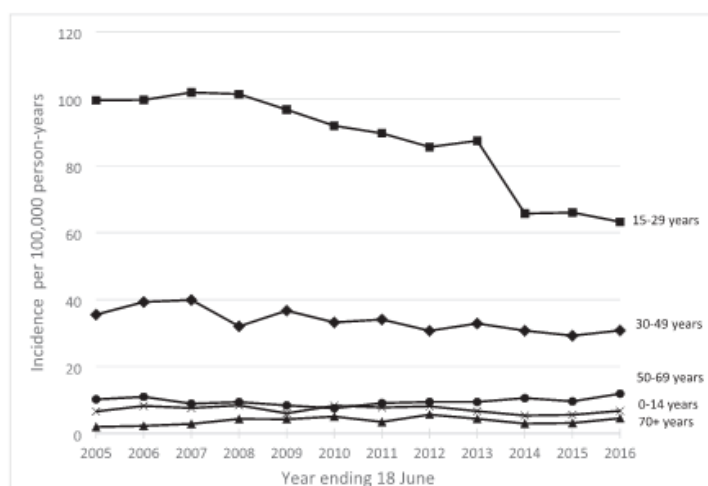


Figure 2 Annual incidence of hospitalization due to assault occurring between midnight Thursday and midnight Sunday in areas with no local alcohol policy, New Zealand, 19 June 2004–18 June 2016. Rates per 100 000 by age group

Table 1 Hospitalizations for weekend assaults,^a by age group and time-period, in NZ Territorial Authority areas without a Local Alcohol Policy, July 2004–June 2016.

Age (years)	Numerator		Denominator (person-years)		Incidence		Post-change, pre-change			
					Per 100000 person-years				Adjusted ^b	
	Pre	Post	Pre	Post	Pre	Post	IRR	95% CI	Adj IRR	95% CI
Primary analysis										
All ages	12 355	2641	36 953 184	10 309 056	33.4	25.6	0.77	(0.74, 0.80)	0.89	(0.84, 0.94)
All Territorial Authority areas without a local alcohol policy	122	34	3 156 273	965 333	3.9	3.5	0.91	(0.62, 1.33)	0.56	(0.33, 0.93)
70+ in place at 18 June 2016	722	255	7 749 547	2 380 963	9.3	10.7	1.15	(1.00, 1.33)	1.17	(0.95, 1.44)
50–69 Pre-change period 19 June 2004–18 December 2013	3659	802	10 513 056	2 695 216	34.8	29.8	0.86	(0.79, 0.92)	0.96	(0.86, 1.06)
30–49 Post-change period 19 December 2013–18 June 2016	7279	1426	7 809 993	2 205 852	93.2	64.6	0.69	(0.66, 0.73)	0.82	(0.76, 0.89)
15–29										
0–14	573	124	7 724 315	2 061 693	7.4	6.0	0.81	(0.67, 0.98)	0.83	(0.64, 1.08)
Sensitivity analysis										
All ages	10 751	2301	31 731 857	8 881 322	33.9	25.9	0.77	(0.73, 0.80)	0.91	(0.86, 0.97)
All Territorial Authority areas without a local alcohol policy	102	30	2 669 540	827 976	3.8	3.6	0.95	(0.63, 1.43)	0.65	(0.37, 1.14)
70+ in place at 18 June 2016	639	227	6 674 446	2 060 904	9.6	11.0	1.15	(0.99, 1.34)	1.22	(0.97, 1.52)
50–69 Except Nelson, Christchurch and Hamilton	3211	699	9 048 696	2 319 370	35.5	30.1	0.85	(0.78, 0.92)	0.98	(0.87, 1.10)
30–49 Pre-change period 19 June 2004–18 December 2013	6331	1247	6 625 227	1 875 653	95.6	66.5	0.70	(0.66, 0.74)	0.84	(0.78, 0.92)
15–29 Post-change period 19 December 2013–18 June 2016	468	98	6 713 948	1 797 419	7.0	5.5	0.78	(0.63, 0.97)	0.88	(0.66, 1.19)
0–14 Falsification test: hospitalization for over-exertion										
All ages	1153	343	36 953 184	10 309 056	3.1	3.3	1.07	(0.95, 1.20)	1.22	(1.02, 1.45)
All Territorial Authority areas without a local alcohol policy	256	74	3 156 273	965 333	8.1	7.7	0.95	(0.73, 1.22)	1.06	(0.73, 1.53)
70+ in place at 18 June 2016	289	93	7 749 547	2 380 963	3.7	3.9	1.05	(0.83, 1.32)	1.19	(0.84, 1.67)
50–69 Pre-change period 19 June 2004–18 December 2013	334	89	10 513 056	2 695 216	3.2	3.3	1.04	(0.82, 1.31)	1.34	(0.96, 1.89)
30–49 Post-change period 19 December 2013–18 June 2016	226	70	7 809 993	2 205 852	2.9	3.2	1.10	(0.84, 1.43)	1.25	(0.84, 1.85)
15–29										
0–14	48	17	7 724 315	2 061 693	0.6	0.8	1.33	(0.76, 2.31)	1.29	(0.57, 2.94)

^aFirst listed E-codes X85–X09, Y871 for injury between midnight Thursday and midnight Sunday; ^badjusted for seasonality and secular trend, CI = confidence interval, IRR = incidence rate ratio.

The falsification test using hospitalizations for overexertion as a substitute outcome showed an increase in incidence (adjusted IRR = 1.22; 95% CI = 1.02, 1.45) with no evidence of a differential effect by age group.

Change in police-documented night-time assaults

Figure 3 shows the time-series of proportions of police-documented assaults that occurred at night, by week, during the study period, with individual estimates ranging from 26 to 50%. The vertical reference line indicates the date of the intervention.

We obtained a stationary series after twice differentiating the series at lags 52 and 1. We detected significant lags of order 1, 15 and 52 ACF and PACF, and could not reject the white noise assumption for the residuals.

Table 2 presents the unadjusted effect estimates and the SARIMA models estimating change in the proportion of assaults occurring at night with implementation of the restrictions. The unadjusted prevalence ratio suggests a 13% reduction in the proportion of all assaults occurring at night (OR = 0.87; 95% CI = 0.78, 0.98). The SARIMA modelling, which adjusts for seasonality and secular trend, shows that the intervention was associated with an abrupt reduction in the proportion of assaults occurring at night of 1.8% (95% CI = 0.2%, 3.5%). This is rounded to -0.02 in the table, where it is labelled 'post-period'. The gradual permanent change in the intervention model was estimated as -0.29 (95% CI = -2.39, 1.80), thus

we concluded that there was no evidence of an ongoing effect. The 1.8% reduction in the proportion of assaults occurring at night is equivalent to a 4.7% reduction in night-time assaults, i.e. 9.70 (95% CI = 0.10, 19.30) out of 207.4 fewer night-time assaults per week. Temporal falsification tests did not find a reduction in the post-period of the models with dummy intervention dates.

Our sensitivity analysis using the ratio of night-time to daytime assaults produced similar results. This SARIMA model demonstrated that the restrictions were followed by a gradual permanent reduction commencing a season later (shift 1) in the night/daytime ratio of assaults of 1.9%.

DISCUSSION

We found a reduction in assaults occurring at times of usually high alcohol involvement following the implementation of the Sale and Supply of Alcohol Act, in two complementary analyses of national data. The first estimated a reduction of 1.1% in the incidence of hospitalized assaults; the second a 4.7% reduction in police-documented night-time assaults.

Having excluded local government areas with a LAP in place, which may have experienced other changes in availability, we were principally evaluating restrictions on trading hours that were nation-wide but affected a small proportion of alcohol outlets. Even if few in number, these outlets may be disproportionately important contributors to alcohol-related assault, as they were on-licence premises

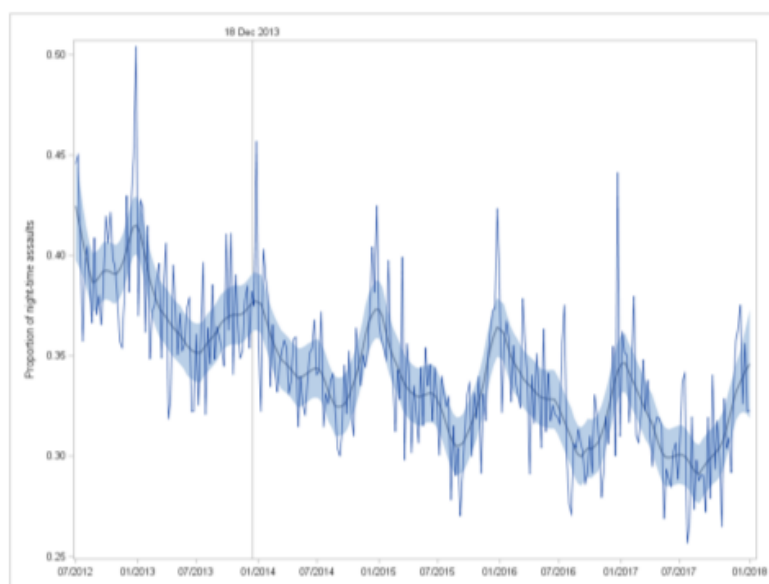


Figure 3 Proportion of assaults documented by police that occurred between 9:00 p.m. and 5:59 a.m., in New Zealand Territorial Authority areas with no local alcohol policy, July 2012–January 2018. The blue continuous line represents fitted values from a locally estimated scatterplot smoothing (LOESS) function, including 95% confidence intervals. [Colour figure can be viewed at wileyonlinelibrary.com]

Table 2 Association of police-documented night-time assaults with implementation of SSAA 2012 in New Zealand Territorial Authority areas with no local alcohol policy, July 2012–January 2018.

	Proportion of assaults occurring at night				Proportion of assaults occurring at night: SARIMA ^a model			
	Pre-change		Post-change		Parameter	Estimate	SE	P-value
	Mean	95% CI	Mean	95% CI				
Primary analysis	0.38	(0.37, 0.39)	0.33	(0.33, 0.34)	MA1,1	0.88	0.04	< 0.0001
Pre-change period: 1 July 2012–18 December 2013					MA2,1	0.18	0.06	00.003
Post-change period: 19 December 2013–31 January 2018					MA3,1	0.7	0.1	< 0.0001
					AR1,1	-0.14	0.07	00.034
					Post-period	-0.02	0.01	00.048
								0
Proportion of assaults occurring at night: SARIMA model ^a					MA1,1	0.88	0.03	< 0.0001
					MA2,1	0.2	0.06	00.001
					MA3,1	0.7	0.11	< 0.0001
					AR1,1	-0.18	0.07	00.007
					Post-period	-0.02	0.02	00.249
					Denom. factor ^b	-0.29	1.07	00.784
								1
								0
Temporal falsification test: intervention date 6 months earlier	0.39	(0.38, 0.40)	0.33	(0.33, 0.34)	MA1,1	0.87	0.04	< 0.0001
Pre-change period: 1 July 2012–18 June 2013					MA2,1	0.2	0.06	00.001
Post-change period: 19 June 2013–31 January 2018					MA3,1	0.68	0.1	< 0.0001
					AR1,1	-0.14	0.07	00.037
					Post-period 6 months earlier	-0.01	0.01	00.239
								0
Temporal falsification test: intervention date 6 months later	0.37	(0.37, 0.38)	0.33	(0.32, 0.33)	MA1,1	0.87	0.04	< 0.0001
Pre-change period: 1 July 2012–18 June 2014					MA2,1	0.19	0.06	00.002
					MA3,1	0.67	0.1	< 0.0001
					AR1,1	-0.14	0.07	00.033
					Post-period 6 months later	0.01	0.01	00.187
								0
Post-change period: 19 June 2014–31 January 2018								
Sensitivity analysis: ratio of night to daytime assaults	0.62	(0.59, 0.64)	0.5	(0.49, 0.51)	Ratio of night to daytime assaults: SARIMA model			
					MA1,1	0.9	0.03	< 0.0001
								1
								0

(Continues)

Table 2. (Continued)

Proportion of assaults occurring at night					Proportion of assaults occurring at night: SARIMA ^a model						
Pre-change		Post-change		Post: pre-change		Parameter	Estimate	SE	P-value	Lag	Shift
Mean	95% CI	Mean	95% CI	Prev. ratio	95% CI						
Pre-change period: 11 July 2012–18 December 2013											
						MA2.1	0.26	0.06	< 0.0001	15	0
						MA3.1	0.62	0.09	< 0.0001	52	0
						AR1.1	−0.18	0.07	00.009	1	0
Post-change period: 19 December 2013–31 January 2018											
						Post-period	−0.06	0.03	00.049	0	1
						Denom. factor ^b	−0.87	0.2	< 0.0001	1	1
						Asymptotic change ^c	−0.03				
						Change in proportion	−0.02				

^aSARIMA model for assessing gradual permanent change; ^bdenominator factor is the parameter related to the 'gradual' permanent decrease on the time-series after the intervention; ^casymptotic change is the impact of the gradual permanent effect on the level of the time-series. SSAA = Sale and Supply of Alcohol Act 2012; SARIMA = seasonal autoregressive integrated moving average; SE = standard error; CI = confidence interval.

previously trading after 4 a.m., and off-licences trading after 11 p.m., that were closed earlier by the new maximum closing times. Before the law change many outlets had operated under 24-hour licences but did not actually trade 24 hours a day, so the magnitude of the change in the population's exposure to the availability of alcohol is unknown. A recent review identified the lack of data on trading hours before restrictions as a common limitation [19].

We found the incidence of hospitalized weekend assault to be much higher in 15–29-year-olds than in other age groups throughout the study period, followed by the 30–49-year-olds, as expected. In an uncontrolled pre-post comparison of hospital discharges, we estimated a reduction in incidence of 11% overall with the maximal reduction of 18% in 15–29-year-olds. We adjusted for seasonal variability and background trend in incidence, and the estimates were robust to restrictive TA inclusion criteria and a falsification test with substitute outcome.

The age-group findings for hospitalizations are consistent with changes in assault being due to the new restrictions on late-night availability, as proposed in Fig. 1. The largest absolute changes were in the 15–29-year-olds, where the prevalence of hazardous drinking is highest, the incidence of assault is highest [32] and where exposure to the change in trading hours would be most frequent. New Zealand research on alcohol purchasing in 2015 reported that 77% of drinkers purchasing from on-license premises between midnight and 4 a.m. were 18–24-year-olds, and 66% were 'at-risk' drinkers [33]. Purchasers from off-licences from 8 to 11 p.m. were also predominantly from this age group (67%), and 61% were 'at-risk' drinkers [33]. Fewer hospitalizations involving children is also plausibly related to reduced drinking in 15–29-year-olds, particularly for infants. The reduction seen in > 70-year-olds, while small in absolute numbers, was the largest relative change.

We also saw a reduction in police reports of assaults occurring at night. A sensitivity analysis using the ratio of night-time to daytime assaults found a reduction of similar magnitude but gradual, and falsification tests were also supportive of the findings.

Limitations

The study's primary limitation is the lack of an unexposed control group, due to the intervention being nation-wide and affecting all age groups. It is therefore difficult to rule out competing explanations for the observed changes. Important potential sources of confounding are other elements of the legislation that were implemented contemporaneously, and any change in police activity when the law came into effect. The three contemporaneous policy changes were introduction of LAPs and new offences relating to excessive promotion of alcohol and supplying alcohol

to a minor without express parental consent. We dealt with the first of these by excluding areas with a LAP in place any time within the study period and a sensitivity analysis for cross-boundary effects. We consider it unlikely that the two new offences would have had much influence on our main findings, but cannot rule that out. There are no data in the public domain on prosecutions under these provisions in the past 6 years, but they would be of public interest and likely to have been reported in the media.

An examination of the early impact of the SSAA on social supply to under 18-year-olds found that parents were supplying more alcohol, but social supply to underage friends had decreased by 8%. Levels of supply remained generally high [34]. Research on the impact of the SSAA on the alcohol environment [17] concluded that: 'Maximum trading hours were the only element of the SSAA found to create a swift change in the alcohol environment, by slightly reducing availability in main cities' (p. 14). Key informants perceived social supply regulations to have relatively poor compliance and to be almost unenforceable before and after the law change [17].

Data on night-time assaults recorded by police provide a broader indicator of the occurrence of assault than hospitalizations alone, but they have a weaker relationship with injury from alcohol-related assault than do hospital admissions and are more susceptible to service delivery artefacts [35], which could confound our results. It is plausible that police activity and reporting of assaults by staff and bystanders around late-night venues could have been affected by change in closing times independently of assault frequency. For example, if police activity increased due to the law change, documentation of assaults may have increased (a service delivery artefact) or it may have acted as a deterrent to assault, which would inflate any effect of earlier closing. Reduced reporting by licensed premises was explored in relation to late-night trading in Newcastle, Australia, which found fewer than 10% of assault reports originated with premises [36]. Service delivery effects are unlikely to confound the association of the intervention with hospitalizations, as admissions are less discretionary, and no changes in admission practices during the study period were identified except in short-stay emergency department discharges, which we excluded. The use of proportions of assaults occurring at night as the primary measure, rather than incidence of night-time assaults, provides some control for potential confounders that affect all assaults.

A second design weakness is that neither outcome is alcohol-specific. We rely on restriction to periods of high alcohol involvement for inference about change in alcohol-related assaults, resulting in the inclusion of some assaults that did not involve alcohol, underestimating the magnitude of change.

The sensitivity of our two indicators is likely to differ. Hospitalization will be a more sensitive indicator of injury due to assault, as the severity of injury has met a threshold and admission becomes less discretionary as severity increases [37]. However, it may not be a sensitive indicator of overall assault incidence. The sensitivity of police data for identifying night-time assaults is not known and many assaults may not come to attention, as both perpetrators and victims may be wary of police involvement. However, unless the sensitivity changed at the time of the restrictions this should not bias estimates. The assessment of the alcohol environment from 2013 to 2015 [17] did not find any change in perceived enforcement, but this does not rule out transient changes. The use of so-called 'high alcohol hours' for assessing changes in assault incidence was examined in a recent study of Queensland police data, which concluded that a time-series based on the time-of-day of assaults would be less prone to bias than reliance on police attributions of alcohol involvement [38].

Greater reduction in hospitalizations than police-documented assaults would be consistent with both reduced incidence and reduced severity of assaults, due to lower levels of intoxication in risky environments [39]. The number of assaults coming to the attention of police may be less affected by reduction in severity of injuries.

There were other limitations of using routinely collected data. In this study we were able to estimate hospitalizations by age group but not socio-economic status, which would also be relevant to policy. The police data did not provide us with any demographics of perpetrators or victims of violence at high alcohol hours. Availability of data also constrained statistical power. For example, we had a short post-intervention period in the hospitalization analysis which limited the precision of the IRR estimates, and the lack of a detectable gradual effect in the time-series analysis may have reflected inadequate power.

This study contributes to a small but growing body of research examining the effects of restrictions in trading hours on the incidence of alcohol-related assault. Consistent findings in two independent analyses, the plausible age-specificity of the reduction in hospitalized assaults, the sensitivity analyses and failed falsification tests increase confidence in the conclusions. The extent to which total trading hours were reduced is unclear, but only the small proportion of on- and off-licence premises that had been trading very late at night were directly affected. Concerns about displacement of late-night purchasing to other locations did not arise, as they do in many settings, because the changes were population-wide, but without robust controls the findings must be interpreted with caution.

Acknowledgements

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Declaration of interests

None.

Author contributions

Jennie Connor: Conceptualization; funding acquisition; investigation; methodology; project administration; supervision; visualization. **Brett MacLennan:** Conceptualization; funding acquisition; investigation; methodology; project administration. **Taisia Huckle:** Data curation; investigation; methodology; project administration. **Jose Romeo:** Data curation; formal analysis; methodology; validation; visualization. **Gabrielle Davie:** Data curation; formal analysis; methodology; validation; visualization. **Kypros Kypri:** Conceptualization; funding acquisition; investigation; methodology; project administration; supervision; visualization.

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Role of alcohol in maxillofacial fractures

[Kai H Lee](#) ¹, [Leslie Snape](#)

Affiliations Expand

- PMID: 18392058

Sign in

Abstract

Background: Excessive consumption of alcohol results in impaired judgement and inappropriate behaviour, and is often a major contributor to interpersonal violence and motor vehicle accidents. This study examines the experience of a tertiary centre in alcohol-related facial fractures.

Methods: A retrospective database of patients presenting to the Oral and Maxillofacial Surgery Service at Christchurch Hospital (New Zealand) during an 11-year period was reviewed. Variables examined include demographics, type of fractures, mode of injury, and treatment delivered.

Results: 2581 patients presented with facial fractures during the study period, 49% of these being alcohol-related. Males accounted for 88% of alcohol-related fractures and 59% were males in the 15 to 29 year age group; 78% of alcohol-related fractures were due to interpersonal violence and 13% to motor vehicle accidents; 65% required hospital admission and 58% underwent surgery.

Conclusion: The majority of alcohol-related facial fractures were due to interpersonal violence, with young men in the 15 to 29 year age group being predominantly affected. Alcohol-related fractures were associated with an increase in the incidence of hospitalisation and surgery. The high prevalence of alcohol as a contributing factor to facial fractures indicates a need to push for community awareness and public education on the harmful effects of alcohol.

Comment in

- [The knock-on effects of unrestrained drinking.](#)

Connor J. N Z Med J. 2008 Apr 4;121(1271):11-4. PMID: 18392057 No abstract available.

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Adela Last Name: (required) Kardos

Please provide the organisation name:
(required)

University of Canterbury

Your role and the number of people your
organisation represents: (required)

General Counsel and Registrar, 2,000>

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

we support the proposed policy to reduce trading hours for all off licences to 9pm daily as well as the proposed policy to place a freeze on new off-licences in high deprivation areas, see full submission document.

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

we support the proposed policy to reduce trading hours for all off licences to 9pm daily as well as the proposed policy to place a freeze on new off-licences in high deprivation areas, see full submission document.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

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You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

See full submission document.

Which part of this proposal would you change?

Required question

A substantial body of international research links higher alcohol outlet density with alcohol consumption and binge drinking (Hobbs et al., 2020). While much of this research is based in North America, researchers in New Zealand have published similar findings concerning our local context.

A 2011 New Zealand cross-sectional study (Connor et al., 2011) found that higher densities of off-licences, bars, and clubs were associated with an increased likelihood of binge drinking. "Binge drinking" was defined in the study as drinking five or more drinks on a single occasion per month. The study found a statistically significant association, with a 4.0% (95% CI: 0.2%–7.9%) increase in the odds of binge drinking for each additional off-licence within 1km of home.

A recent ecological study (Hobbs et al., 2020) used data from multiple New Zealand sources to examine the relationship between outlet density and a number of other variables, including alcohol consumption behaviours and crime. The findings of the paper included:

A positive association between proximity to alcohol outlets (all types grouped - i.e. the combination of on-licence, off-licence, and other) and hazardous drinking.*

A specific link between off-licence outlet proximity and crime (including common assault and sexual offences)

The study found that the prevalence of hazardous drinking was highest for those in the 20-24 age bracket, which notably coincides with the demographics of university student populations.

Both directly and through its partnership with the University of Canterbury Students' Association (UCSA), the University of Canterbury pursues a range of measures intended to educate students around safe alcohol use and partying, and provide opportunities for them to connect and socialise in ways that don't involve alcohol. The underlying issue is a broad societal phenomenon, however, and addressing it requires a multifaceted approach.

Consistent with the Riccarton-Ilam permanent alcohol ban area intended to help address alcohol-related behaviours that can adversely impact both university students and the nearby community, we ask the Christchurch City Council to designate the University of Canterbury as a 'sensitive site' in its Local Alcohol Policy, alongside primary and secondary schools. We ask that you restrict new bottle stores opening near the University of Canterbury campus.

In light of the research referred to above, we support the proposed policy to reduce trading hours for all off licences to 9pm daily as well as the proposed policy to place a freeze on new off-licences in high deprivation areas.

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While this measure will not address existing patterns of harmful drinking, it will help to limit further exacerbation of the issue by preventing an increase in off-licence density near the campus.

*Unlike the 2011 study, the association was not statistically significant for off-licence outlets in particular, but was significant when all outlet types were grouped and for on-licence outlets. Hazardous drinking was determined by the New Zealand Health Survey using the World Health Organisation's 10-question Alcohol Use Disorders Identification Test (AUDIT). Hazardous drinkers are those with an AUDIT score of 8 or higher, which represents "an established pattern of drinking that carries a high risk of future damage to physical or mental health" (Hobbs et al., 2020).

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

we support the proposed policy to reduce trading hours for all off licences to 9pm daily as well as the proposed policy to place a freeze on new off-licences in high deprivation areas, see full submission document.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

General feedback

Do you have any other comments?

Full feedback:

A substantial body of international research links higher alcohol outlet density with alcohol consumption and binge drinking (Hobbs et al., 2020). While much of this research is based in North America, researchers in New Zealand have published similar findings concerning our local context.

A 2011 New Zealand cross-sectional study (Connor et al., 2011) found that higher densities of off-licences, bars, and clubs were associated with an increased likelihood of binge drinking. "Binge drinking" was defined in the study as drinking five or more drinks on a single occasion per month. The study found a statistically significant association, with a 4.0% (95% CI: 0.2%–7.9%) increase in the odds of binge drinking for each additional off-licence within 1km of home.

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included:

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- A specific link between off-licence outlet proximity and crime (including common assault and sexual offences)

The study found that the prevalence of hazardous drinking was highest for those in the 20-24 age bracket, which notably coincides with the demographics of university student populations.

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In light of the research referred to above, we support the proposed policy to reduce trading hours for all off licences to 9pm daily as well as the proposed policy to place a freeze on new off-licences in high deprivation areas.

While this measure will not address existing patterns of harmful drinking, it will help to limit further exacerbation of the issue by preventing an increase in off-licence density near the campus.

*Unlike the 2011 study, the association was not statistically significant for off-licence outlets in particular, but was significant when all outlet types were grouped and for on-licence outlets. Hazardous drinking was determined by the New Zealand Health Survey using the World Health Organisation's 10-question Alcohol Use Disorders Identification Test (AUDIT). Hazardous drinkers are those with an AUDIT score of 8 or higher, which represents "an established pattern of drinking that carries a high risk of future damage to physical or mental health" (Hobbs et al., 2020).

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Draft Local Alcohol Policy 2025

Vice-Chancellor's Office

Adela Kardos, General Counsel and Registrar
Tel: +64 3 369 0922
Email: adela.kardos@canterbury.ac.nz



16 May 2025

A substantial body of international research links higher alcohol outlet density with alcohol consumption and binge drinking (Hobbs et al., 2020). While much of this research is based in North America, researchers in New Zealand have published similar findings concerning our local context.

A 2011 New Zealand cross-sectional study (Connor et al., 2011) found that higher densities of off-licences, bars, and clubs were associated with an increased likelihood of binge drinking. "Binge drinking" was defined in the study as drinking five or more drinks on a single occasion per month. The study found a statistically significant association, with a 4.0% (95% CI: 0.2%–7.9%) increase in the odds of binge drinking for each additional off-licence within 1km of home.

A recent ecological study (Hobbs et al., 2020) used data from multiple New Zealand sources to examine the relationship between outlet density and a number of other variables, including alcohol consumption behaviours and crime. The findings of the paper included:

- A positive association between proximity to alcohol outlets (all types grouped - i.e. the combination of on-licence, off-licence, and other) and hazardous drinking.*
- A specific link between off-licence outlet proximity and crime (including common assault and sexual offences)

The study found that the prevalence of hazardous drinking was highest for those in the 20-24 age bracket, which notably coincides with the demographics of university student populations.

Both directly and through its partnership with the University of Canterbury Students' Association (UCSA), the University of Canterbury pursues a range of measures intended to educate students around safe alcohol use and partying, and provide opportunities for them to connect and socialise in ways that don't involve alcohol. The underlying issue is a broad societal phenomenon, however, and addressing it requires a multifaceted approach.

Consistent with the Riccarton-Ilam permanent alcohol ban area intended to help address alcohol-related behaviours that can adversely impact both university students and the nearby community, we ask the Christchurch City Council to designate the University of Canterbury as a 'sensitive site' in its Local Alcohol Policy, alongside primary and secondary schools. We ask that you restrict new bottle stores opening near the University of Canterbury campus.

In light of the research referred to above, we support the proposed policy to reduce trading hours for all off licences to 9pm daily as well as the proposed policy to place a freeze on new off-licences in high deprivation areas.

While this measure will not address existing patterns of harmful drinking, it will help to limit further exacerbation of the issue by preventing an increase in off-licence density near the campus.

Classification: In-Confidence

*Unlike the 2011 study, the association was not statistically significant for off-licence outlets in particular, but was significant when all outlet types were grouped and for on-licence outlets. Hazardous drinking was determined by the New Zealand Health Survey using the World Health Organisation's 10-question Alcohol Use Disorders Identification Test (AUDIT). Hazardous drinkers are those with an AUDIT score of 8 or higher, which represents "an established pattern of drinking that carries a high risk of future damage to physical or mental health" (Hobbs et al., 2020).

Ngā mihi



Adela Kardos

General Counsel/Registrar | Pouroki

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adela.kardos@canterbury.ac.nz

Classification: In-Confidence

400

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 18/05/2025

First Name: (required) Brodie Last Name: (required) Marra-Stevenson

Please provide the organisation name:
(required)

Waipuna (St John of God Hauora Trust)

Your role and the number of people your
organisation represents: (required)

Senior Project Worker, 54 Adult Employees, 52

Children, Waipuna's 1477 Clients since

01/01/2022

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

See Attached Document

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

See attached

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

400

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

See attached

Which part of this proposal would you change?

Required question

See attached

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

See attached

Which part of this proposal would you change?

Required question

See attached

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

See attached

Which part of this proposal would you change?

Required question

See attached

General feedback

Do you have any other comments?

See attached

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

T24Consult Page 2 of 3

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(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
CAYAD Chch - LAP Submission 2025

Item 4

Attachment A

Brodie Marra
Community Action on Youth and Drugs (CAYAD) Ōtautahi
On behalf of St John of God Waipuna
Senior Project Worker

cayad@sjog.org.nz
349 Woodham Rd Wainoni
Christchurch 8061
0211937209

Submission on the Draft Christchurch Local Alcohol Policy

Introduction

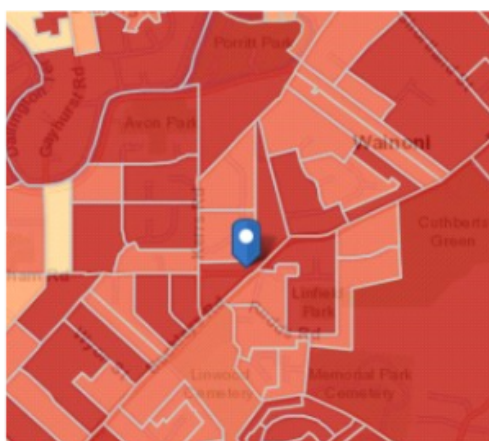
1. Community Action on Youth And Drugs (CAYAD) is a public health initiative delivered by a variety of organisations in their communities across the motu . In Ōtautahi, CAYAD is based at St John of God Waipuna (part of St John of God Hauora Trust) - a youth and community services provider - in Avonside/Wainoni.
2. This submission is on behalf of Waipuna, representing 54 adult employees and 52 children.
3. Waipuna works mostly with young people from east Christchurch, we provide a variety of services: counselling, young parents social work support, Mana Ake, Adventure Therapy, Reintegration Services, a preschool, and CAYAD.
4. Waipuna has worked with 1477 young people since 1 Jan 2022.
5. One of CAYAD's roles is to help communities to participate in the alcohol licensing process, which makes up a substantial part of our work.
6. We would like to speak to our submission at the hearing.

Reduction in off-licensed maximum trading hours to 9pm

7. We strongly support restriction of the licensed hours of all off-licenses to 9pm.
8. However, this must also apply to remote licenses. Industry sources say that some bottle stores are planning to use remote licenses to sell alcohol 9pm-11pm. We recognise that remote licenses can potentially deliver from outside of the district, but by restricting local off-licenses ability to sell remotely it will greatly reduce ease of availability at short notice.
9. Furthermore, because reduction in access is one of the three most effective ways to reduce alcohol-related harm, we suggest reducing off-license hours to 7am-7pm. Early morning sales are not a significant driver over harm overall, while the later licenses open the more disproportionately harmful those sales are likely to be. The point of restricting sales in the evening is to reduce top-ups, pre-loading, and side-loading - this would also benefit on-licenses and encourage people to drink in supervised environments with host responsibilities.

Place a freeze on new off-licences in high deprivation areas

10. We strongly support this.
11. After three bottle stores within a 1km radius were closed in 2021 near us, we have had to fight over 10 applications (not all made it to the public phase) to re-open them. A simple glance at the Deprivation Index Map will show that this area is not a suitable location for a bottle store: a 1km radius is in the 82nd percentile of the most deprived areas in New Zealand, as is a 2km radius (2018, IMD).



12. New Zealand and international evidence is very clear that alcohol-related harm and deprivation are related. Essentially, a deprived community is less able to absorb the impact of easy access to alcohol, which compounds many existing challenges. Putting a bottle store in a highly deprived area should be prohibited.¹

13. Without the LAP rule regarding deprivation, it puts the onus on the community to fight each application as they come in - this is hard work and the licensing process is a formal,

legal one that highly-deprived communities are not well-placed to participate in. While we have been able to repeatedly mobilise communities and provide them with support, we do not think this should be necessary. For the alcohol industry, this rule would provide clarity and regulatory certainty.

14. Councillors will no doubt see advantage in having fewer hearings, which come at quite a cost to the ratepayer.

Restricting new bottle stores' proximity to sensitive community facilities

15. We support this but suggest the addition of preschools and youth organisations. This is because New Zealand research shows that exposure to alcohol advertising, which mostly comes from local licensed premises, increases alcohol consumption by young people. By including these two categories, this would further limit exposure to alcohol advertising.²
16. We support the 200m radius within the bulk of the district but believe that Banks Peninsula should be 100m with the central city. Councillors should consider that this would only impact new off-licenses, so is hardly going to change the existing character and amenity of the Peninsula communities.

¹ Matthew Hobbs, Lukas Marek, Malcolm Campbell, and Joreintje D. Mackenbach, "Associations between Alcohol Outlets and Crime and Disorder in New Zealand: A National Study," *Health & Place* 65 (2020): 102397, <https://doi.org/10.1016/j.healthplace.2020.102397> ; Gordon C. Hay, Paul Whigham, Kypros Kypri, and Jennie L. Connor, "Neighbourhood Deprivation and Access to Alcohol Outlets: A National Study," *Health & Place* 15, no. 4 (2009): 1086–1093, <https://doi.org/10.1016/j.healthplace.2009.05.008> ;

² Sneyd, Sarah, Noor Al-Jebouri, Helina Gifawossen, Nathan Cowie, and Nicki Jackson. "Alcohol Advertising Near Schools in Tāmaki Makaurau Auckland." *New Zealand Medical Journal* 136, no. 1584 (October 20, 2023). <https://nzmj.org.nz/journal/vol-136-no-1584/alcohol-advertising-near-schools-in-tamaki-makaurau-auckland>

17. We also suggest that there is some restriction on proximity to parks with play areas. Sadly, in our experience across the district we see local parks used as bars by anti-social drinkers. The most disturbing example is Woodham Park, where the local school and residents report numerous incidents of drunken behaviour - including children being offered alcohol.

18. We suggest off-licenses should be prohibited within a 150m radius from any park that has children's play equipment or paddling pools.

General Feedback

19. CAYAD commends Council staff for their robust pre-consultation, report, and engagement with key stakeholders. We also commend Councillors for proceeding with a potentially controversial process in election year and urge them to stay the course.

20. We believe many other measures could be added to the LAP over time, but what the Council has proposed is a good start. For future reference, the most effective measures to reduce alcohol-related harm are 1. Price increases, 2. Advertising restrictions, and 3. Accessibility reductions.

Conclusion

21. In conclusion, Waipuna's CAYAD team urges the Council to adopt a Local Alcohol Policy that will reduce harm to the communities we serve by:

- a. **Reducing all off-licence trading hours** to 9 pm (and ideally tightening further to 7 am-7 pm) to curb opportunistic "top-ups," pre-loading and side-loading, and shift consumption into supervised venues;
- b. **Freezing new off-licences** within high-deprivation areas to prevent compounding social harms and relieve over-burdened neighbourhoods from repeated licence hearings;
- c. **Imposing proximity restrictions** around schools, preschools, youth organisations and parks with children's play equipment (150 m), and maintaining a 200 m buffer elsewhere (100 m on Banks Peninsula and the CBD), to reduce young people's exposure to alcohol advertising and limit anti-social drinking near those sensitive sites.

22. These measures—grounded in robust New Zealand and international evidence linking accessibility to harm—will not only protect our most vulnerable communities but also provide clarity and certainty for industry, reducing costly hearings and ensuring policy consistency.

23. CAYAD would welcome the opportunity to speak to this submission of behalf of St John of God Waipuna.

Community Action on Youth and Drugs Ōtautahi
On behalf of St John of God Waipuna

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Draft Local Alcohol Policy 2025

Item 4

Attachment A

Submitter Details

Submission Date: 14/05/2025

First Name: (required) Belinda Last Name: (required) Symon

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

9.00pm closing

Which part of this proposal would you change?

Required question

It needs to also include remote licenses.

I believe it will be an absolute waste of time putting this policy in place if you do not include remote license. It is super easy (and happens now, uber eats is just one example, who do not check ID, or Intox levels) for remote licenses to carry on selling and delivering to 11.00pm. It will be a loophole that many that are already in the industry will use. If remote licenses are not included then I would oppose 9.00pm closing

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)?

You can view high deprivation maps [here](#).

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

I like the fact that this policy has been introduced to the proposed changes

242

Which part of this proposal would you change?

Required question

It must include Supermarkets. No problem with a supermarket opening in the area but they should not get a Liquor License. To allow them a liquor license completely defeats the purpose and would signal that Supermarket sales do not cause harm. Yet super markets sell , wine , beer , Ciders and styles of RTD's that do not have spirits in them.

Also deprivation areas finish from one side of the road to the other. Which means a license can still be applied for extremely close to the high deprivation area. I think you should extend this to within 500m (maybe 1km) of the high deprivation area .

Obviously this should not have any impact of existing licenses or the sale of an existing License

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

I agree

Which part of this proposal would you change?

Required question

as long as it does not affect existing licenses or the sale of an existing license

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal would you change?

Required question

As long as it does not affect existing license or the sale of an existing license

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

242

Which part of this proposal do you like?

Required question

restricting the proximity

Which part of this proposal would you change?

Required question

It does not include Existing Licenses or the sale of Existing Licenses

General feedback

Do you have any other comments?

Please please please include remote licenses to 9.00pm . There is already "talk" in the industry of setting up deliveries after 9.00pm

Also please make it an even playing field and not disadvantage anyone by excluding some licenses (e.g. supermarkets, remote licenses)

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

Off-licence

284

Draft Local Alcohol Policy 2025

Item 4

Attachment A

Submitter Details

Submission Date: 14/05/2025

First Name: (required) John Last Name: (required) Symon

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

9.00pm Closing

Which part of this proposal would you change?

Required question

The proposal should also apply to Remote License Holders. By excluding Remote Sellers of alcohol this policy would be driving consumers to purchase alcohol from remote license holders, particularly after 9.00pm.

Not only is this not fair to all the other outlets; but it would also serve to undermine the effectiveness of this policy, in that alcohol could still be purchased up until 11.00pm

If Remote License holders are not included in this proposal then I would not support 9.00pm closing for everybody else. ie I would oppose 9.00pm closing

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

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I support the concept of the proposal; I think it is a good thing to do

And I like that it does not apply to existing licenses

Which part of this proposal would you change?

Required question

This proposal should apply to all suppliers of off license alcohol; ie remote licenses should not be able to deliver in the designated area... and supermarkets should not be able to sell alcohol in the designated area. Otherwise the proposal is not going to achieve its goal of reducing alcohol harm... the consumer will simply visit the supermarket or buy remotely; making the restriction on limiting bottle stores ineffective and biased.

I also think the designated area should be extended by 500m around the high deprivation area... to limit the effect of opening a bottle store on the edge of a high deprivation area

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

Everything except the distance

Which part of this proposal would you change?

Required question

I believe 100m would be fairer

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

Sounds reasonable

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

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Please tell us why you support this proposal:

Makes sense in a localised area

General feedback

Do you have any other comments?

Yes... it is very important to have all outlets operating under the same rules, to stop customers simply buying from another outlet (eg Remote license holders) and getting alcohol delivered outside of the proposed closing time. (ie after 9.00pm).

This is already a problem now and will get much worse if the proposal isn't changed to also limit Remote License holders as well.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

Off-licence

369

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Carolyn Last Name: (required) Moffat

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

I support 9pm closing time as long as all off licences close at the same time, including bottle stores, supermarkets and over the bar off licences.

Which part of this proposal would you change?

Required question

Remote sellers appear to be exempt from this policy. Remote sellers can deliver alcohol outside of their trading hours. This gap needs to be addressed before it is exploited by those wishing to purchase alcohol later at night and have it delivered immediately for consumption, and by people setting up remote sales businesses specifically to cover this market. This would defeat the purpose of restricting off licence hours and would be contrary to the aims of the LAP which is to reduce alcohol related harm.

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

A freeze on new off licences in high deprivation areas may help to reduce alcohol related harm

Which part of this proposal would you change?

Required question

369

The draft LAP allows applicants who can show that their primary purpose is not the sale and supply of alcohol to apply for an exemption to a freeze on granting an off-licence to new premises in areas that service high deprivation communities. This seems to contradict the purpose of the Draft LAP -to prevent alcohol related harm in a highly deprived area.

It seems that the Council is saying, for example, a supermarket may wish to open in a highly deprived area, and therefore it can apply for an exemption to open a new off licence. And when has a supermarket ever been refused a liquor licence? Very rarely does this happen. Surely a freeze is a freeze, why would a supermarket be offered the opportunity to bring more alcohol into a highly deprived area? The quantities of alcohol that a supermarket would sell are significant and would certainly have an impact on alcohol related harm in a highly deprived area.

There should be no exemptions in high deprivation areas. If the LAP wishes to draw a line in the sand and restrict new off licences in highly deprived areas, then this should apply to everyone. A supermarket should be able to operate its core business of food supply without relying on alcohol sales. It is certainly very possible that a supermarket can operate without selling alcohol as is shown in Trust areas such as Invercargill. Supermarkets sell a lot of cheap alcohol, and it would be foolish to assume that a new supermarket opening with a liquor license in an area designated as high deprivation wouldn't have an impact on alcohol related harm in that area. If the Council is serious with its intent to reduce alcohol related harm in high deprivation areas via a freeze on new off licences, then a freeze should apply to all new licences.

All new off licences in a high deprivation area should be considered on merit, rather than a simple freeze, then this means that all applicants can be treated fairly, rather than some being given an unfair advantage, which is what this policy effectively does. It gives supermarkets an unfair competitive advantage.

I am also concerned that there could be potentially unintended consequences to a freeze on new off premise licences in highly deprived areas. If, for example, an off licence had to move premises because of events beyond our control, such as a fire or earthquake damage, or even a lease ending, that off licence would need to apply for a new liquor licence, as a liquor licence belongs to a certain address, and is attached the to the legal title of the premises. If a freeze was in place, as is proposed, off licences would not be able to move within the area that they had been operating in. While some may argue that a sinking lid may be a good thing, I do think that business owners who are operating a legal business selling alcohol, and who are considered to be a fully compliant and responsible retailer deserve some respect and protection for their business. People invest considerable time and money into businesses, and it should not be able to be taken away from them simply because of a freeze when there is no ability to consider the application on its merits.

My business in Papanui does appear to be in a High Deprivation zone now, although in previous years such as in the 2018 Deprivation maps it was not, and in 2013 Deprivation maps, the shopping area of Papanui was designated as non residential as the population was fewer than 60-100 people. We had to move our business after the earthquakes, and we have also survived a fire in the block of shops. If there was a building fire or earthquake damage etc and we had to relocate, we would not be able to. I think after 21 years of business, we would deserve the opportunity to restart our business in another premise in the area, provided that we could prove that we have been good and responsible operators. In other words, we should have the right to apply for a new liquor licence in the same area, and our application should be considered based on merit.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

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You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

Who will determine the actual distance and how? There needs to be some clarification as to what 200 metres actually means -does this mean 200 metres from the front door to the school on the same street, or as the crow flies? There needs to be a definition provided by the Council as to how 200 metres will be calculated. Distance via road would be a fair way to assess this, rather than a 200 metre radius which may restrict unnecessarily because the bottle store is on a different road altogether.

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I support part of this proposal

Which part of this proposal do you like?

Required question

Central City Exemption

Which part of this proposal would you change?

Required question

The City Centre zone should be treated differently, but I do not agree with the whole of the four avenues area. The 200m metre restriction should apply across the city, and only the Central City Zone should be exempt.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

I'm not sure

Please tell us why you're not sure:

I don't know the areas mentioned well enough to comment.

General feedback

Do you have any other comments?

While the intention of the Draft LAP to reduce alcohol-related harm in high deprivation areas is commendable, the proposed freeze on new off-licences may have unintended consequences and could potentially disrupt responsible businesses that have demonstrated compliance and responsible retailing over the years. It is crucial that any policy considers the merits of individual applications and provides clear guidelines, particularly concerning proximity restrictions and exemptions, to ensure fairness and effectiveness in achieving its goals.

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Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

Off-licence

Item 4

Attachment A

378

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Greg Last Name: (required) Hoar

Please provide the organisation name:
(required)

Super Liquor Holdings Limited

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

Please refer to the attached document

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Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

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No

Please tell us why you don't support this proposal:

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Restricting new bottle stores' proximity to sensitive community facilities

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General feedback

Do you have any other comments?

Please refer to the attached document

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T24Consult Page 2 of 3

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Off-licence

Attached Documents

Name
Christchurch LAP 2025 - Super Liquor Holdings Submission - FINAL

Item 4

Attachment A

378



Super Liquor Holdings Limited
Submission
to the
Christchurch City Council
On the
Draft Local Alcohol Policy 2025 (Draft LAP)

14 May 2025

ABOUT SUPER LIQUOR

Super Liquor is a national retail liquor chain. There are 192 Super Liquor branded bottle stores across New Zealand from Kaitia to Invercargill, owned by 119 franchisees. Each store is a locally operated business which has entered into a franchise agreement with Super Liquor. Each franchisee receives the benefits of, and honours the obligations of participating in, the Super Liquor branded system.

Super Liquor franchisees represent a broad spectrum of small and medium sized businesses in both urban and provincial locations. Franchisees pride themselves on being part of the communities they serve, supporting local businesses, charities and sports clubs. Super Liquor has a co-operative group culture.

Super Liquor currently has 17 Super Liquor stores that will be governed by the Christchurch LAP (should it become operative).

Super Liquor:

- a) provides franchisees with extensive support in the way of retail expertise and advice,
- b) requires compulsory and ongoing training in the Sale & Supply of Alcohol Act 2012 (Act) by all franchisees and staff through the Super Liquor Academy (a comprehensive online training system),
- c) conducts in-person audits of all Super Liquor stores quarterly,
- d) requires high in-store retail standards,
- e) provides security training and advice,
- f) provides comprehensive retail management systems, IT support and training,
- g) requires specific store brand standards to be met – including no supplier branding on the exterior of stores,
- h) monitors new product development and maintains a 'no sale' policy on product deemed contrary to responsible alcohol retailing.

At Super Liquor, we do not aim to lead on price (i.e. our products are not always the cheapest in town). Instead, we pride ourselves on providing the best quality in-store experience (lighting, layout, quality fixtures etc) , customer service and product range.

All Super Liquor store owners have invested significant capital in their businesses. They appreciate that obtaining an alcohol licence and then having it renewed every three years is a privilege upon which their significant capital investment is dependent.

Because of their significant investment, they also want to have the confidence that licensing application or renewal assessments by District Licensing Committees (DLCs) and the Alcohol Regulatory and Licensing Authority (ARLA) are based on balanced and reasonable criteria aimed at achieving the object of the Act. Super Liquor has invested significant time in submitting to Local Alcohol Policy (LAP) processes throughout New Zealand over the past 12 years. We believe any policy or condition needs to be evidence based and on matters that the licensee can control or influence.

Super Liquor takes its responsibilities towards the minimisation of alcohol harm very seriously.

DRAFT LAP

As a retailer of alcohol beverage products, we have been involved with the Christchurch City Council's LAP consultation process.

Regulatory uncertainty is challenging for businesses particularly if conditions or policies are unclear or differentiate between alcohol retailers whether a bottle store, supermarket, remote seller, cellar door or on premise.

We support a licencing system that recognises and drives safe responsible liquor retailing to minimise alcohol related harm. To be effective, such a system needs to treat all alcohol retailers the same, whether they be on-premises, bottle stores, liquor retail, clubs, supermarkets or remote sellers. The system must be reasonable (see section 3(2)(a) of the Act).

Super Liquor raises a number of concerns on the Draft LAP and believes it should have amendments made. Super Liquor believes if the Draft LAP is adopted, it will have a range of unforeseen, unintended and adverse consequences. The reasons are explained in the following sections.

MAXIMUM TRADING HOURS FOR OFF-LICENCES – ELEMENT 5

We are open to the proposal to reduce the trading hours of off-licences providing the same trading hours are applied to **all** off licences. It appears that remote sellers will be partially (or fully) exempt from the intended application of the trading hours restrictions because they can deliver alcohol outside trading hours (see section 49 and 59 of the Act). This gap should be addressed.

We strongly oppose any proposal that differentiates types of off-licences on the basis of hours as that may not be reasonable or effective in relation to minimising alcohol related harm. It would therefore be inconsistent with the object of the Act (see section 94 of the Act).

Such inequitable conditions do nothing to reduce alcohol related harm, they simply shift customer behaviour and create commercial advantage and disadvantage between alcohol retailers.

The reasons why we believe hours must be treated the same for all off-licences (including Remote Sellers) are:

1. **Compliance:** Off licence premises have a range of compliance measures that must be met by the Liquor Licensing Inspector, Medical Officer of Health and NZ Police, including visits from Tri-Agencies. Remote sellers do not have the same compliance or licensing requirements.
2. **Increase of Remote licenses.** There has been a large increase in the granting of remote licences throughout New Zealand. Under the Draft LAP, we will see opportunists applying for remote licenses, increasing the sale of alcohol at late hours and potentially delivering large quantities of alcohol late at night for consumption in private or public places.
3. **Alignment with Local Alcohol Policy:**
The remote seller's exemption does not align with the overarching goals of local alcohol policies, which aim to reduce alcohol-related harm and promote responsible consumption.

FREEZE ON NEW OFF-LICENCES IN HIGHLY DEPRIVED AREAS – ELEMENT 6

SLH believes that the proposed approach is unreasonable, in that there may be valid reasons why a new off-licence application should be granted (for example; future residential developments, population growth, change in zoning, natural events causing the movement or changes to residential zones, socially deprived communities that are not disproportionately affected by alcohol harm etc).

Moreover, the freeze isn't based on merit. An exemplary proposal by a new entrant is prohibited and an existing poor operator is protected.

We believe that the District Licensing Committee and ARLA should have the responsibility of determining any further applications for a new off licence based on the information provided by an applicant and recognizing that every application is unique to the particular site in question.

We are also unclear and strongly oppose why there is an exemption to this policy if the applicant can show that the primary purpose of their business is not the sale and supply of alcohol. Is this provision for supermarket and/or grocery store development?

The Draft LAP states that the policy provision aims to address the disproportionate level of alcohol-related harm experienced by higher-deprivation communities by preventing further concentration of off-licensed premises in these areas (element 6.1). If the Council believes that an area is so deprived and at such a high risk of alcohol related harm that new off licenses should be restricted, then why would an exception be offered. Supermarkets can still operate profitably without a off-licence as they do currently in Trust areas within New Zealand. We ask that this exemption be removed from the draft LAP.

Moreover, we fail to see how permitting supermarkets and grocery stores to retail alcohol in high deprivation areas meets the purpose of the freeze. It is at least arguable that it would be preferable for persons to be able to undertake the weekly family shop without the distraction or temptation of alcohol. We are not aware of any evidence to support the exemption from a harm minimisation perspective.

Should this condition be adopted, we also ask that the Council includes remote sellers in this policy.

If the Council was to proceed with this policy with its intentions to restrict alcohol in highly deprived areas, it would need to:

1. Restrict deliveries by remote sellers into the 'freeze areas outside of the agreed Off licence trading hours; and
2. Decline applications for new remote sellers in these areas.

RESTRICTION ON THE LOCATION OF NEW BOTTLE STORES – ELEMENT 7

Super Liquor believes that each application should be judged on its merits and not governed by an overriding provision. We have two main concerns about this policy clause:

1. **How are the distances measured?**

We ask that the Council provide a clear definition in terms of route, as radiuses are not relevant in a lot of situations. We request that distances are measured by road and from front entrances as opposed to 'as the crow flies'. In some instances, the 'as crow flies' measure

may infringe the restricted distance even though the bottle store may be located on a separate road that a person will never be able to view.

2. **Why are On Premises not treated in the same way?**

We note that the Draft LAP does not have a similar condition for ON-licences. We are not sure why this condition is imposed solely on off premises licences.

There are lots of examples of other alcohol retail settings without such restrictions. Young people can walk past pubs, cafés and restaurants displaying outdoor signage with alcohol branding, or sun umbrellas with alcohol branding or signs promoting happy hours and consumers drinking alcohol in garden bars etc. Yet there are no restrictions in the LAP.

Super Liquor submits that consistent application of policy to the three types of off licenses described (On, Off & Clubs) will ensure a consistent application of control and compliance.

3. **Addiction treatment and rehabilitation centres**

Addiction treatment and rehabilitation centres often do not have signage and contact details etc are not immediately accessible online. How can an applicant for an off-licence identify a site that is deliberately seeking to not be identifiable by the public generally?

DISCRETIONARY CONDITION REMOTE OFF-LICENCES – ELEMENT 8

Super Liquor supports the following discretionary condition for remote-seller licences.

"The Committee may impose a condition further restricting the hours alcohol may be delivered if sold remotely from those set out in section 59 of the Act".

For example, Super Liquor would support a condition that deliveries by Remote Sellers would be restricted up to the closing time of Off Premise stores. For clarity, this would mean that all off premise licenses would therefore operate within the same hours, including remote sellers.

CONCLUSION

Super Liquor believes that the Draft LAP is one-sided and has raised a number of concerns that have been outlined above. Super Liquor is concerned that elements of the Draft LAP lack a proper evidential basis and have been inserted on the basis of individual opinion or speculation. Where elements may have an evidential basis, the integrity of the element is undermined by illogical exemptions.

We believe that the LAP does very little (if anything) to target bad operators and focusses on the quantity and location of licences, over the quality of licence holders. The provision of exemptions (direct or indirect) for remote sellers/supermarkets/grocery stores does nothing to reduce alcohol related harm.

Thank you for the opportunity to make this submission. We wish to speak to this submission before the committee and answer any question the committee may have.

Thank you.

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Greg Hoar
National Operations Manager
Super Liquor Holdings Limited

Attachment A Item 4

356

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Jagroop Singh Last Name: (required) Brar

Please provide the organisation name:
(required)

G & B Pvt Ltd

Your role and the number of people your
organisation represents: (required)

Director and 10 employee

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

I support part of this proposal

Which part of this proposal do you like?

Required question

We are comfortable with the first part of this policy as the reduction of offlicence trading hours is applied to all off licences.

Which part of this proposal would you change?

Required question

we do not agree with the exemption of remote sellers for the following reasons:

1. This part of the policy does nothing to reduce alcohol harm. It simply shifts customer behaviour for consumers to buy online and get deliveries within 60 minutes or less.
2. Lack of consistency: Enforcing different restrictions on remote sellers and offpremise creates loopholes that could lead to increased alcohol consumption and potential harm outside of designated trading hours.
3. Compliance: Off premise have a range of compliance measures that must be met, including visits from Tri-Agencies. Remote sellers do not have the same compliance or licensing requirements.
4. Increase of Remote sellers licenses. There has been a large increase in the granting of remote sellers licences. Under this policy there is nothing preventing individuals purchasing large quantities of alcohol late at

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night for consumption at home, which could contribute to alcohol-related problems.

5. Alignment with Local Alcohol Policy: The remote sellers exemption does not align with the overarching goals of local alcohol policies, which aim to reduce alcohol-related harm and promote responsible consumption.

We are seeking a **level playing field** amongst all off premise licenses including remote sellers' licenses

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

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Should this condition be adopted, we also ask that the Council includes remote sellers in this policy.

If the Council was to proceed with this policy with its intentions to restrict alcohol in highly deprived areas, it would need to:

1. Restrict deliveries by remote sellers into the 'freeze areas outside of the agreed Off licence trading hours;
- and 2. Decline applications for new remote sellers in these areas.

Restricting new bottle stores' proximity to sensitive community facilities

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No

Please tell us why you don't support this proposal:

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Licences

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Off-licence

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Submitter Details

Submission Date: 16/05/2025

First Name: (required) Manoj Last Name: (required) Bishnoi

Please provide the organisation name:
(required)

Bishnoi Brothers pvt Ltd T/A Super liquor Belfast

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Submitter Details

Submission Date: 23/04/2025

First Name: (required) Pavneet Last Name: (required) Nagra

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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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

Do you support restricting new bottle stores from opening within 50 metres of addiction treatment/rehabilitation

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centres, and primary schools and secondary schools in Banks Peninsula (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

Yes

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

Off-licence

305

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 15/05/2025

First Name: (required) Pavneet Last Name: (required) Nagra

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

No

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

No

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.

You can read more about this on our Let's Talk page.

(Required question - you will not be able to submit without selecting a response)

No

Restricting new bottle stores' proximity to sensitive community facilities

Do you support restricting new bottle stores from opening within 50 metres of addiction treatment/rehabilitation

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centres, and primary schools and secondary schools in Banks Peninsula (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

No

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

Off-licence

395

Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 18/05/2025

First Name: (required) Kate Last Name: (required) Burgess

Please provide the organisation name:
(required)

Christchurch Youth Council Incorporated

Your role and the number of people your
organisation represents: (required)

Coordinator - 25 rangatahi

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Please see attached document

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)?

[You can view high deprivation maps here.](#)

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

[You can read more about this on our Let's Talk page.](#)

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:

Please see attached submission

Restricting new bottle stores' proximity to sensitive community facilities

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)?

[You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.](#)

[You can read more about this on our Let's Talk page.](#)

(Required question - you will not be able to submit without selecting a response)

Yes

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395

Please tell us why you support this proposal:
Please see attached submission

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).
You can read more about this on our Let's Talk [page](#).

(Required question - you will not be able to submit without selecting a response)

Yes

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Christchurch Youth Council Submission on the Draft Local Alcohol Policy



18 May 2025

Christchurch Youth Council Submission on the Draft Local Alcohol Policy

Kei te rangatira, tēnā koe,

We are writing on behalf of the Rūnaka Taiohi o Ōtautahi / Christchurch Youth Council, a group of rangatahi volunteers aged 12 - 24 from across the Ōtautahi region. This submission is informed by feedback from 92 young people who completed our online survey on the Local Alcohol Policy, as well as insights gathered through Instagram polls (see attached documents), internal discussions, and a dedicated workshop with our membership of 25 volunteers aged 12 - 24. Our survey was also widely shared throughout Lincoln, resulting in a high number of responses from young people just outside Christchurch. As Lincoln students frequently attend school, events, and social gatherings in Christchurch city, we believe their perspectives are still highly relevant to this submission.

We strongly encouraged young people to submit their own responses to the Christchurch City Council (CCC) survey by frequently promoting it on social media. We also advised young people to complete the CCC survey before responding to ours, as our survey was intended to be supplementary to the official process. To ensure the data we collected was useful to CCC, we incorporated the exact wording from many of their survey questions.

While we acknowledge that we are not representative of all young people in Christchurch, we have a mandate as an organisation to collect, collate, and share the perspectives presented to us by rangatahi. We recognise that young people may hold diverse views on this issue, and we value and respect these differences as part of a broader conversation about youth safety and wellbeing in our city.

Comment on the Role of the Local Alcohol Policy

We understand that a Local Alcohol Policy (LAP) allows councils to set rules for how alcohol is sold and supplied in their district, in line with the **Sale and Supply of Alcohol Act 2012**. We support the Council's use of this tool to help reduce alcohol-related harm in Christchurch and Banks Peninsula.

Young people told us clearly that alcohol has a significant and harmful presence in their lives and communities. They spoke about feeling unsafe near bottle stores at night, the normalisation of drinking in youth culture, and the accessibility of alcohol even for those under 18. We believe the LAP is an important opportunity to respond to these issues.



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

We support this policy.

Young people identified late-night alcohol availability as a major factor contributing to unsafe situations. This includes people congregating near bottle stores at night, 'topping up' alcohol after already drinking, and antisocial behaviour in neighbourhoods.

We support reducing off-licence trading hours to 9pm as a clear and effective step toward improving safety and wellbeing. We agree that this will help limit the opportunity for excessive alcohol consumption and reduce harm, especially for vulnerable communities.

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

We support this policy.

We support placing a freeze on new off-licences in high deprivation areas, as there is already an oversaturation of alcohol outlets in these communities. Increasing access to alcohol in areas already facing significant social and economic challenges only worsens existing harm.

We did not ask a specific question about this policy in our online youth survey. During our workshops, we found that the concept was complex and required additional context to understand properly. To avoid confusion and ensure our survey was accessible to all young people engaging with it, we chose not to include it in the final survey questions.

However, based on wider discussions and the clear evidence of harm associated with the density of alcohol outlets, particularly in high deprivation areas, we support a freeze as a proactive and protective measure for community wellbeing.

Policy 3: Restrict new bottle stores near sensitive sites

We support the proposed restrictions on new bottle stores opening within specified distances of addiction treatment and rehabilitation sites, secondary schools, and primary schools across Christchurch, with varied buffer zones depending on the area:

- **200 metres** in suburban areas outside the central city four avenues



- **100 metres** (addiction treatment/rehab sites) and **50 metres** (schools) within the central city four avenues
- **50 metres** in Banks Peninsula
- The policy excludes the City Centre Zone, recognising its role as the primary destination for dining, nightlife, and entertainment.

We agree these distances provide a practical and proportionate approach to reducing harm near sensitive sites while balancing community needs.

Recommendation: Include Early Childhood Education (ECE) centres with a smaller buffer distance.

While the current policy excludes ECE centres due to their high number and widespread locations, our engagement with young people showed significant concern about alcohol outlets near these centres. We recommend considering a smaller buffer zone of **50 metres**, around ECE centres to acknowledge their vulnerability without making the policy overly complex or impractical.

Additional considerations:

- Distance alone is not sufficient. Location context matters—such as outlets directly on busy bus routes or adjacent to main entrances of sensitive sites, which can have a greater impact even if outside the specified distance.

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Draft Local Alcohol Policy 2025

Submitter Details

Submission Date: 16/05/2025

First Name: (required) Marie Last Name: (required) Pollisco

Please provide the organisation name:
(required)

Waipuna Halswell Hornby Riccarton Community
Board

Your role and the number of people your
organisation represents: (required)

Chairperson

Feedback

Reduction in off-licensed maximum trading hours to 9pm

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

This means all bottle stores, supermarkets, specialty stores, small grocery stores, wineries and Working Men's Clubs would have to stop selling alcohol to take off the premises no later than 9pm each day.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:
See Attached.

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)?

You can view high deprivation maps here.

Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

You can read more about this on our Let's Talk page.

Required question: you will not be able to submit without selecting a response.

Yes

Please tell us why you support this proposal:
See Attached.

Restricting new bottle stores' proximity to sensitive community facilities

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)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch here.
You can read more about this on our Let's Talk page.

363

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

See Attached.

Restricting new bottle stores' proximity to sensitive community facilities

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?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

See Attached.

Restricting new bottle stores' proximity to sensitive community facilities

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

You can view maps illustrating proximity restrictions applied to sensitive sites across Christchurch [here](#).

You can read more about this on our [Let's Talk](#) page.

(Required question - you will not be able to submit without selecting a response)

Yes

Please tell us why you support this proposal:

See Attached.

General feedback

Do you have any other comments?

See Attached.

Licences

Finally, do you currently hold any of the following (select all that apply)?

Your answer will help us understand what different stakeholders and groups think.

(Required question - you will not be able to submit without selecting a response)

I do not hold a liquor licence

Attached Documents

Name
Draft LAP WHHR Submission

DRAFT LOCAL ALCOHOL POLICY 2025

Waipuna Halswell Hornby Riccarton Community Board Submission

1. Introduction

- 1.1. The Waipuna Halswell-Hornby-Riccarton Community Board (“the Board”) appreciates the opportunity to make a submission on the Christchurch City Council(the Council)’s DRAFT LOCAL ALCOHOL POLICY 2025 (the Policy).
- 1.2. The Board wishes to be heard in support of its submission.

2. Submission

- 2.1. The Board supports the Council’s adoption of a Local Alcohol Policy under the Sale and Supply of Alcohol Act 2012. The Board considers that the policy will, in line with the objectives of the Act, support the safe and responsible sale, supply and consumption of alcohol in Christchurch and Banks Peninsula and help minimise the harm caused by the excessive or inappropriate consumption of alcohol .
- 2.2. The Board supports the proposal to restrict the hours of sale for all off-licence retailers across the district to no later than 9pm, noting that the restriction will apply to all bottle stores, supermarkets, small grocery and convenience stores, wineries , Working Men’s Clubs and other venues that hold an off licence but would not apply to remote sales .
- 2.3. As part of its early engagement with community on a draft Policy the Board heard that some residents consider opening time for sales should not only close earlier than the current 11pm but should also start later. The Board would therefore suggest restriction to 8am-9pm opening hours could be included in the Policy .
- 2.4. The Board supports the proposal to freeze granting new alcohol licences for off-licence premises in high deprivation areas to address the disproportionate level of alcohol-related harm experienced by higher-deprivation communities . The Board is aware that it has areas of high deprivation within its Board area and considers the freeze is likely to stem the proliferation of off-licence premises in these areas and thereby reduce alcohol related harm.
- 2.5. The Board considers that it is appropriate that any freeze on granting new alcohol licences for off-licence premises in high deprivation areas be revisited in six years.
- 2.6. The Board agrees that the Policy should prevent new bottle stores, opening in suburban areas across Christchurch: within 200 metres of an addiction treatment/rehabilitation site, secondary school or primary school in Christchurch suburbs ; within 50 metres of an addiction treatment/rehabilitation site and secondary school or primary school in Banks Peninsula and; within 100 metres of an addiction/ rehabilitation site and 50 metres of a secondary school or primary school in the central city.

As part of its early feedback on the Policy the Board indicated support for the proximity of all new alcohol outlets being restricted to beyond 200 metres from sensitive sites that is the restriction would apply to any bottle store, supermarket, small grocery store, specialty stores, nightclub, pub/ tavern, restaurants, cafes or sports club selling alcohol. While the Board understands the complexity of application of such a restriction this is its preference.

The Board is disappointed that proposed restriction of proximity will only apply to addiction treatment/rehabilitation site, secondary school or primary school in Christchurch and not early learning centres suburbs, hospitals and medical centres, marae, places of worship, City Mission, and pharmacies. It is concerned that the proposed restrictions will result in increased proliferation of bottle stress in the vicinity of these other sites that the Board regards as also sensitive.

- 2.7. With the same reservations outlined in 2.6 the Board supports the proposals for restrictions on new bottle stores in suburban areas from opening within :
- 100 metres of an addiction treatment/rehabilitation site and 50 metres of a secondary school or a primary school within the central city four avenues (of Bealey, Moorhouse, Fitzgerald and Deans).
 - 50 metres of an addiction treatment/rehabilitation site, a secondary school or a primary school in Banks Peninsula (including but not limited to Akaroa, Lyttleton, Diamond Harbour, Little River, and Duvauchelle).

- 2.8. The Board was disappointed that reduced trading hours for on licences in suburban areas is not being progressed. The Board proposed a 1am closing time for on licences in suburban areas in its early feedback comments. The Board certainly believes it should be included in the policy for Riccarton and Hornby.

Riccarton has been troubled with late on licence behaviour due to the large youth population including both students and young workers.

There has been an issue in Riccarton which ended up in the district court, The Foundry, the student bar on the Ilam campus was closing at 12 midnight. The students would then walk down to the Bush Inn Bar which was a student haunt, open to 3am and offered students cheap drinks. Noise and minor vandalism would occur on route. At 3am the students would return committing more major acts of vandalism, defecation on gardens and louder noise. At one stage a serious rape occurred. The panel making the decision on Licence hours decided migration was the problem and made the closing hours for the Bush Inn 1am. Things settled down at this point, the student bar was not feasible and the Bush Inn Bar was turned into a family restaurant.

Hornby has been troubled also by noisy behaviour on suburban streets. The Board can discuss this further at the Hearing.

- 2.9. The Board believes Council has a responsibility to residents to ensure poor behaviour through excessive drinking is minimised. 1am seems an appropriate time for suburban on licences to close and the Board is not aware of reasons why this timeframe was not included in the Policy.
- 2.10. Just as a footnote the non - movement to other bars after 1am in the central city was proposed at the request of police. The Board has no opinion on this.
- 2.11. The Board requests that the Council re-considers introduction of a 1am closing time for all suburban on licences. There does not appear any reason to not require this closing time.

3. Conclusion

The Board requests that its submission be taken into consideration.
The Board would like to speak to its submission.

CHAIRPERSON Waipuna Halswell-Hornby-Riccarton Community Board

Dated 15 May 2025.

16 May 2025

Christchurch City Council
PO Box 73011
Christchurch 8154

Tēnā koutou

Advice on Draft Local Alcohol Policy 2025

1. This technical advice has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, with input from clinicians from Hospital and Specialist Services at Health New Zealand – Te Whatu Ora Waitaha and the University of Otago, Christchurch. NPHS Te Waipounamu services the South Island including Ōtautahi Christchurch.
2. NPHS Te Waipounamu recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956.
3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.
4. NPHS Te Waipounamu is focused on the achievement of equitable health outcomes. We use the Ministry of Health's definition of equity:

In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.¹

5. This document responds to some of the specific questions Council has asked and sets out matters of interest and concern to NPHS Te Waipounamu. This document also reiterates the advice that we provided during the early engagement consultation (see **Appendix 1**). Our recommendations are based on evidence about public health and equity.

General Comments

6. NPHS Te Waipounamu acknowledges Christchurch City Council for its progress on developing a Local Alcohol Policy (LAP). LAPs can give communities more say on access to alcohol and have the potential to help reduce alcohol harm. We acknowledge the process undertaken by Council to ensure that the local community and stakeholders have had multiple opportunities to be involved in, and influence, the development of the draft LAP.
7. As highlighted in our previous advice, alcohol causes significant harm to individuals, whānau and communities, costing Aotearoa New Zealand an estimated \$9.1 billion each year.² These harms are not distributed equitably – Māori are twice as likely to die from alcohol-related causes compared to non-Māori.³ People in most socio-economically deprived areas are also

¹ Ministry of Health – Manatū Hauora (2024, July 2). Achieving equity. <https://www.health.govt.nz/about-ministry/what-we-do/achieving-equity>

² NZIER. (2024). Costs of alcohol harms in New Zealand: Updating the evidence with recent research. A report for the Ministry of Health. Accessed from: <https://www.health.govt.nz/system/files/2024-06/costs-of-alcohol-harms-in-new-zealand-2may24-v2.docx>

³ Chambers T., Mizdrak A., Jones A.C., Davies, A. Sher, A. (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Wellington, New Zealand. Accessed from: https://healthnz.figshare.com/articles/report/Estimated_alcohol-attributable_health_burden_in_Aotearoa_New_Zealand/27048892/1

at greater risk of harm from alcohol, yet are more exposed to off-license premises, having three times as many compared to the least deprived areas.⁴ In Christchurch and Banks Peninsula, the areas with the second highest levels of deprivation (quintile 4) have the highest proportion of off-licensed premises, with 31.5% of all licenses located in these areas.⁵

8. Health and wellbeing are influenced by a wide range of factors beyond the health sector, including the sale and supply of alcohol. Local councils have a role in reducing the harm caused by the availability and accessibility of alcohol.
9. The health burden of alcohol harm spans the life course, from before birth to death. Almost all parts of the health system deal with the diseases and injuries caused by alcohol, including (but not limited to) emergency departments, midwifery and obstetrics, paediatrics, disability services, primary care, oncology, surgery (including orthopaedics, plastics, maxillofacial), and mental health and addiction services.
10. Alcohol causes a substantial preventable health burden via a range of diseases and injuries, both acute and chronic. The harm caused by alcohol increases health system costs and costs to society at large. Across the whole population, preventing adverse health outcomes caused by alcohol and reducing inequities in these outcomes can be achieved by reducing or removing exposure to alcohol.

Alcohol and cancer risk

11. Alcohol is a class 1 carcinogen and is a leading preventable cause of cancer. Alcohol is known to cause at least seven types of cancer, including breast (in women), bowel, mouth, throat (pharynx), voice box (larynx), liver and oesophagus. Research shows that in 2018 alcohol caused an estimated 1,250 cancers in Aotearoa New Zealand. Breast cancer and bowel cancer made up 69% of all alcohol-attributable cancers.⁶ Māori experience a higher burden of alcohol-related cancers. In 2012, Māori lost an average of 12.7 years of life from alcohol-attributable cancers compared with 10.1 years for non-Māori.⁷
12. All types of alcohol – beer, wine and spirits – increase the risk of developing cancer. The risk increases with the average amount of alcohol consumed each day and adds up over a lifetime. As any amount of alcohol consumption increases the risk of cancer, there is no safe minimum level of alcohol use.⁸
13. A recent report used the results from a large cohort study to calculate the absolute risks of developing any of the seven cancer types listed above. The results showed that around 17% of women who drink either nothing or less than one standard US drink per week (14 g ethanol)⁹ would develop such a cancer in their lifetime. This was taken as the baseline level of risk. This number rose to nearly 22% of women who have two drinks per day (28 g ethanol) on average. For men, the lifetime risk of developing one of these seven cancer types rose from a baseline of about 10% for those who don't drink or have less than one standard drink per week, to about 13% for those who, on average, have two drinks daily. The sex difference

⁴ Randerson S, Wright K, Connor J. (2024). Local alcohol policies: What's the opportunity to reduce harm. Public Health Communication Centre Aotearoa. 23 October. Accessed from: <https://www.phcc.org.nz/briefing/local-alcohol-policies-whats-opportunity-reduce-harm>

⁵ Christchurch City Council. (2025). Local Alcohol Policy Research Report. Information to support the development of a Local Alcohol Policy for Christchurch City. Christchurch: Christchurch City Council. https://letstalk.ccc.govt.nz/download_file/4637/1820

⁶ Chambers T., Mizdrak A., Jones A.C., Davies, A. Sherk, A. (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Wellington, New Zealand. Accessed from: https://healthnz.figshare.com/articles/report/Estimated_alcohol-attributable_health_burden_in_Aotearoa_New_Zealand/27048892/1

⁷ Connor, J., Kydd, R., MacLennan, B., Shield, K., & Rehm, J. (2017). Alcohol-attributable cancer deaths under 80 years of age in New Zealand. *Drug and alcohol review*, 36(3), 415–423.

⁸ World Health Organization. (2023). No level of alcohol consumption is safe for our health. 4 January 2023. Accessed from: <https://www.who.int/europe/news/item/04-01-2023-no-level-of-alcohol-consumption-is-safe-for-our-health>

⁹ In New Zealand, a standard drink is defined as containing 10 grams of ethanol.

is because breast cancers account for a large number of cancers that are attributable to alcohol in women but not in men.¹⁰

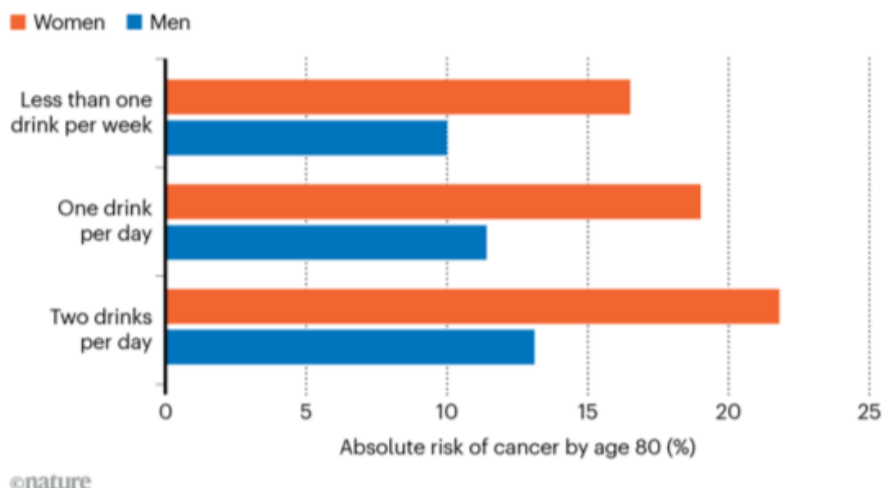


Figure 1: Absolute risk of seven types of cancer by age 80 for women and men¹¹

14. To put this in the Aotearoa New Zealand context, the most recently published overall cancer incidence rates in Canterbury are in the top half of the distribution of all former District Health Board districts and are higher than in any other South Island district (see figure below).¹²

Cancer incidence rate in New Zealand

figure.nz

By district health board, 2022, age-standardised rate per 100,000 population

Provider: Te Whatu Ora - Health New Zealand

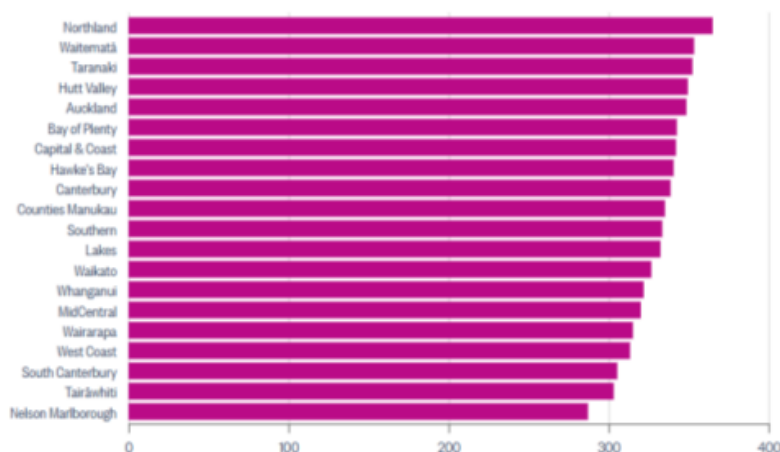


Figure 2: Cancer incidence rate in New Zealand, by district health board, 2022

¹⁰ The U.S. Surgeon General's Advisory. (2025). Alcohol and Cancer Risk. Office of the Surgeon General. Accessed from:

<https://www.hhs.gov/sites/default/files/oash-alcohol-cancer-risk.pdf>

¹¹ Pearson, H. Alcohol and cancer risk: what you need to know. Nature. 11 March 2025. Accessed from: <https://www.nature.com/articles/d41586-025-00729-5#:~:text=On%20the%20basis%20of%20such,as%20more%20data%20are%20collected>.

¹² Figure.NZ. (2025). Cancer incidence rate in New Zealand. Accessed 13 May 2025. Available from: <https://figure.nz/chart/gpVpoYvh8Qbkepu8>

Alcohol and the emergency department

15. Emergency departments (EDs) are overcrowded. Alcohol use contributes to ED overcrowding, with 5–7% of ED presentations thought to be alcohol-related¹³. Alcohol-related presentations to ED also result in longer lengths of stay than non-alcohol-related presentations.¹⁴ Alcohol is a factor in 16–21% of injury-related ED attendances¹⁵ with a fivefold risk of death in the year after admission for those presenting to ED with an injury associated with alcohol use.¹⁶ Overcrowding in ED is also directly linked to increasing mortality. For every patient who arrives in an Aotearoa New Zealand ED at a time when more than 10% of admitted patients had an ED length of stay greater than 8 hours, there is a 10% increased risk of death within 7 days.¹⁷
16. Alcohol is a significant contributor to violence and aggression within acute healthcare settings, such as EDs.¹⁸ For staff working in an ED that is already under considerable pressure due to overcrowding, occupational violence and aggression associated with alcohol use can contribute to and exacerbate emotional exhaustion, moral distress, anxiety, depression, burnout and post-traumatic stress disorder.¹⁹ The consequences for the health system are significant, with decreased job satisfaction, diminished productivity, absenteeism and difficulties with recruitment and retention of staff. In a recent survey by the Australasian College for Emergency Medicine, 71% of staff reported that they frequently experience alcohol-related abuse, threats, intimidation or harassment from patients, and that this has negatively impacted on their wellbeing, job satisfaction, safety and workload.²⁰ In Christchurch, 35% of ED reports of violence and aggression are related to alcohol.²¹ A recent study found that 97.9% of ED staff in Australasia have experienced alcohol-related verbal aggression, and 92.7% have experienced alcohol-related physical aggression.²²
17. Alcohol is also associated with acute mental health concerns. In Christchurch, 9% of youth (aged under 18 years, so not of legal age to purchase alcohol) presenting to ED with a mental health crisis had used alcohol and other drugs before arrival.²³ As outlined below (at 21), suicide deaths are also associated acute alcohol use.²⁴ Suicide attempts are 25–50 times more common than death by suicide, and the majority of patients who make suicide attempts are seen in ED.

¹³ Crilly, J., East, K., Brown, J., Zhang, P., Byrnes, J., Fuyk, J., ... & Rosengren, D. (2022). The profile, clinical characteristics, and outcomes of alcohol-and non-alcohol-related patient presentations to Queensland emergency departments: a multi-site observational study. *Australian Health Review*, 46(6), 701-709.

¹⁴ Svensen, G., Kool, B., & Buller, S. (2019). The burden of alcohol related presentations to a busy urban New Zealand hospital emergency department. *The New Zealand Medical Journal (Online)*, 132(1504), 56-66.

¹⁵ Williams, M., Mohsin, M., Weber, D., Jalaludin, B. I. N., & Crozier, J. (2011). Alcohol consumption and injury risk: a case-cross-over study in Sydney, Australia. *Drug and Alcohol Review*, 30(4), 344-354.

¹⁶ Goldman-Mellor, S., Kaplan, M. S., & Qin, P. (2022). Mortality risk following nonfatal injuries with alcohol use disorder involvement: a one-year follow-up of emergency department patients using linked administrative data. *Journal of studies on alcohol and drugs*, 83(6), 879-887.

¹⁷ Jones, P. G., & Van der Werf, B. (2021). Emergency department crowding and mortality for patients presenting to emergency departments in New Zealand. *Emergency Medicine Australasia*, 33(4), 655-664.

¹⁸ Pich, J. V., Kable, A., & Hazelton, M. (2017). Antecedents and precipitants of patient-related violence in the emergency department: Results from the Australian VENT Study (Violence in Emergency Nursing and Triage). *Australasian emergency nursing journal*, 20(3), 107-113.

¹⁹ Shea, T., Sheehan, C., Donohue, R., Cooper, B., & De Cieri, H. (2017). Occupational violence and aggression experienced by nursing and caring professionals. *Journal of nursing scholarship*, 49(2), 236-243.

²⁰ Australasian College for Emergency Medicine. (2024). Alcohol-Related Harm in Australasian Emergency Departments. Melbourne: ACEM. Available from: <https://acem.org.au/News/April-2024/ACEM-releases-report-on-alcohol-harm-in-emergency>

²¹ Richardson, S. K., Grainger, P. C., & Joyce, L. R. (2022). Challenging the culture of emergency department violence and aggression. *NZ Med J*, 135(1554), 9-19.

²² Egerton-Warburton, D., Lim, J., Seneviratne, D. S., Bumpstead, S., Joyce, L. R., Kuhn, L., ... & Fatovich, D. M. (2025). Enough is enough: Alcohol-related occupational violence and aggression in emergency departments in Australia and New Zealand. *Emergency Medicine Australasia*, 37(2), e70021.

²³ Joyce, L. R., Crossin, R., Jin, S., Young, W., & Mulder, R. (2024). Presence of alcohol and other drug use within youth mental health presentations to the emergency department: A single-site retrospective observational study. *Emergency medicine Australasia*, 36(2), 213-220.

²⁴ Crossin, R., Cleland, L., Beaulrais, A., Witt, K., & Boden, J. M. (2022). Acute alcohol use and suicide deaths: an analysis of New Zealand coronial data from 2007-2020. *NZ Med J*, 135(1558), 65-78.

18. The vast majority (76%) of alcohol-related ED presentations in Christchurch occur after use of alcohol purchased at off-licence venues and consumed in people's own homes.²⁵
19. An estimated 128,963 Accident Compensation Corporation (ACC) claims per year in Aotearoa New Zealand are directly attributable to alcohol.²⁶ Amongst major trauma patients presenting to Christchurch ED, 15.5% had alcohol detectable in their blood.²⁷

Alcohol, mental health and suicide

20. Alcohol is a depressant drug, which can disrupt the balance of neurotransmitters in the brain and affect feelings, thoughts and behaviour. There are links between harmful alcohol use and poorer mental health outcomes, such as anxiety disorders, depression, and there is clear evidence that alcohol use is a risk factor for self-harm and suicidal behaviour.²⁸ Data from the Christchurch Health and Development Study found a causal link between alcohol use disorder and major depression.²⁹ A review of the literature shows that having an alcohol use disorder, or major depression, doubles the risk of developing the other disorder over the lifespan.³⁰
21. Alcohol is a significant and modifiable risk factor for suicide.³¹ ³² An international meta-analysis of 33 studies found that alcohol use was associated with a 94% increase in the risk of death by suicide over time.³³ An earlier meta-analysis of seven studies found that acute alcohol use was associated with a 7 times increased risk of suicide attempt.³⁴ New Zealand research is broadly consistent with the wide body of international evidence that consistently establishes alcohol as one of the most significant contributors to suicide globally.
22. Acute alcohol use can increase suicide risk through mechanisms such as increased feelings of despair and hopelessness, impaired decision making, increased impulsivity, and reduced inhibitions.³⁵ Research that considered the impact of alcohol on suicidal ideation in Aotearoa New Zealand found that alcohol use disorder was associated with a significantly increased risk of suicidal ideation across the life course, and this risk was 50% higher in those with alcohol use disorder, when controlling for other relevant variables including (but not limited to); socioeconomic status, employment, depression, and other substance use disorders.³⁶ Research has also found that 26.6% of suicide deaths in Aotearoa New Zealand involve acute alcohol use.³⁷

²⁵ Joyce, L. R., Cleland, L., Forman, E., Hlavac, A., Foulds, J., & Crossin, R. (2024). Changes in alcohol-related emergency department presentations-a comparison of three waves in 2013, 2017 and 2022. *The New Zealand Medical Journal (Online)*, 137(1593), 56-67.

²⁶ Chambers T., Mizdrak A., Jones A.C., Davies, A. Sher, A. (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Wellington, New Zealand. Accessed from: https://healthnz.figshare.com/articles/report/Estimated_alcohol-attributable_health_burden_in_Aotearoa_New_Zealand/27048892/1

²⁷ Isles, S., McBride, P., Gee, P., Fleischer, D., Kappatos, D., Pandey, R., ... & Gabbe, B. (2023). Prevalence of psychoactive drugs in injured patients presenting to an emergency department. *Emergency Medicine Australasia*, 35(1), 25-33.

²⁸ World Health Organization. (2019). *Harmful use of alcohol, alcohol dependence and mental health conditions: a review of the evidence for their association and integrated treatment approaches*. Geneva: WHO. Available from: <https://www.who.int/europe/publications/i/item/WHO-EURO-2019-35711-43330-60791>

²⁹ Fergusson, D. M., Boden, J. M., & Horwood, L. J. (2009). Tests of causal links between alcohol abuse or dependence and major depression. *Archives of general psychiatry*, 66(3), 260-266.

³⁰ Boden, J. M., & Fergusson, D. M. (2011). Alcohol and depression. *Addiction*, 106(5), 906-914.

³¹ World Health Organization. (2014). *Preventing suicide: A global imperative*. Geneva: World Health Organization. Available from: <https://www.who.int/publications/i/item/9789241564779>

³² Kölves, K., Crossin, R., Witt, K. (2022). Alcohol use and suicidal behaviour: current research evidence and potential for prevention. In: *Handbook of Substance Misuse and Addictions: From Biology to Public Health*.

³³ Isaacs, J. Y., Smith, M. M., Sherry, S. B., Seno, M., Moore, M. L., & Stewart, S. H. (2022). Alcohol use and death by suicide: A meta-analysis of 33 studies. *Suicide and Life-Threatening Behavior*, 52(4), 600-614.

³⁴ Borges, G., Bagge, C. L., Cherpitel, C. J., Conner, K. R., Orozco, R., & Rossow, I. (2017). A meta-analysis of acute use of alcohol and the risk of suicide attempt. *Psychological medicine*, 47(5), 949-957.

³⁵ Crossin, R., Cleland, L., Beautrais, A., Witt, K., & Boden, J. M. (2022). Acute alcohol use and suicide deaths: an analysis of New Zealand coronial data from 2007-2020. *NZ Med J*, 135(1558), 65-78.

³⁶ Crossin, R., Cleland, L., McLeod, G. F., Beautrais, A., Witt, K., & Boden, J. M. (2022). The association between alcohol use disorder and suicidal ideation in a New Zealand birth cohort. *Australian & New Zealand Journal of Psychiatry*, 56(12), 1576-1586.

³⁷ Crossin, R., Cleland, L., Beautrais, A., Witt, K., & Boden, J. M. (2022). Acute alcohol use and suicide deaths: an analysis of New Zealand coronial data from 2007-2020. *NZ Med J*, 135(1558), 65-78.

23. Furthermore, when considering the sex-specific effects of acute use of alcohol on suicide, research has found that Māori females were 35% more likely to die by suicide involving acute alcohol use, and Pasifika females were 75% more likely to die by suicide involving acute alcohol use, when compared to European females.³⁸
24. Recent research has also clearly demonstrated an association between young people's access to alcohol outlets with presentations to hospital for self-harm in Aotearoa New Zealand.³⁹

Alcohol and the digestive system

25. Alcohol can have myriad effects on the digestive system, from the point it enters the body until it is metabolized or excreted. Alcohol enters the blood stream via the stomach and small intestine, where it is distributed throughout the body and is drained into the liver. Alcohol consumption is associated with conditions related to the liver, pancreas, and gallbladder, including cirrhosis, pancreatitis, chronic liver disease, alcohol-involved gastritis, and increased risk of gastrointestinal tract cancers.
26. Over recent years, the Christchurch Hospital gastroenterology service has seen a progressive increase in the number of admissions of people with life-threatening alcoholic hepatitis and also complications and deaths from alcohol-related chronic liver disease. These patients often require long and/or more frequent inpatient stays in the hospital and have a high mortality.
27. The Christchurch Hospital gastroenterology service has also observed a progressive lowering in the age of people presenting with life-threatening and life-ending complications of severe liver disease caused by heavy alcohol intake.

Alcohol and child development

28. While drinkers cause alcohol-related harm to themselves, drinkers also impose considerable health harm on others via many pathways such as traffic injury, interpersonal violence, and Foetal Alcohol Spectrum Disorder (FASD).⁴⁰ FASD is a preventable neurodevelopmental disorder caused by exposure to alcohol before birth and is likely to be the leading preventable cause of non-genetic intellectual disability in Aotearoa New Zealand.⁴¹ The lifelong disability caused by prenatal alcohol exposure cannot be reversed.
29. It is estimated that FASD costs Aotearoa New Zealand about \$4.8 billion per year, which is over half of the estimated cost of alcohol harm in Aotearoa New Zealand per year (\$9.1 billion).⁴² Further, of the 78,277 healthy life years lost due to alcohol in 2018, 90.3% were attributed to FASD.⁴³
30. People who have FASD, or possible FASD, can experience complex physical, behavioural, learning and intellectual problems that persist throughout their lives. Impairment also varies

³⁸ Crossin, R., Dikstaal, J., McKerchar, C., Cleland, L., Beutrais, A., Witt, K., & Boden, J. M. (2024). Sex-specific analysis of acute alcohol use in suicides and reporting of alcohol as a contributor to suicide deaths in New Zealand 2007–2020: a cross-sectional study of coronial data. *The New Zealand Medical Journal* (Online), 137(1604), 62-72.

³⁹ Hetrick, S. E., Hobbs, M., Fortune, S., Marek, L., Wiki, J., Boden, J. M., ... & Bowden, N. (2024). Proximity of alcohol outlets and presentation to hospital by young people after self-harm: A retrospective geospatial study using the integrated data infrastructure. *Australian & New Zealand Journal of Psychiatry*, 58(2), 152-161.

⁴⁰ Babor, T. F., Casswell, S., Graham, K., Huckle, T., Livingston, M., Österberg, E., ... & Sompalsam, B. (2022). Alcohol: no ordinary commodity: research and public policy. Oxford: Oxford University Press.

⁴¹ Popova, S., Charness, M. E., Burd, L., Crawford, A., Hoyme, H. E., Mukherjee, R. A., ... & Elliott, E. J. (2023). Fetal alcohol spectrum disorders. *Nature reviews Disease primers*, 9(1), 11.

⁴² NZIER. (2024). *Costs of alcohol harms in New Zealand: Updating the evidence with recent research*. A report for the Ministry of Health. Accessed from: <https://www.health.govt.nz/system/files/2024-06/costs-of-alcohol-harms-in-new-zealand-2may24-v2.docx>

⁴³ Casswell, S., Huckle, T., Romeo, J. S., Moewaka Barnes, H., Connor, J., & Rehm, J. Quantifying Alcohol-Attributable Disability-Adjusted Life Years to Others than the Drinker in Aotearoa, New Zealand. *Addiction*. 119(5), 855-62.

between people depending on when and how much alcohol was consumed during the development of their brain and other parts of their bodies before they were born.⁴⁴

31. The impact of FASD on individuals is wide-reaching and can include increased mortality and morbidity, poor educational and employment outcomes including benefit dependence, increased interaction with the criminal justice system and increased interaction with alcohol, drug and mental health services.⁴⁵
32. Most children with FASD in the general population are neither recognised nor diagnosed with any frequency. The prevalence of FASD in Aotearoa New Zealand has not yet been measured, but international studies and expert opinion suggest that around 3 to 5 percent of people may be affected by the effects of alcohol exposure before birth. This implies that around 1800-3000 babies may be born with FASD each year in Aotearoa New Zealand.⁴⁶ A New Zealand study that estimated the prevalence of FASD (using alcohol use during pregnancy data sourced from the 2018 New Zealand Health Survey) found that Māori experience higher rates of FASD compared to other ethnicities.⁴⁷
33. Actions to reduce the accessibility, affordability and availability of alcohol, alongside strategies aimed at de-normalising alcohol use in all settings, are likely to result in a reduction in the prevalence of FASD.⁴⁸

Specific Comments

Reduction in off-licensed maximum trading hours to 9pm

34. NPHS Te Waipounamu strongly supports the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula. We support applying the reduction of maximum default trading hours to *all* off-license types to create a level playing field for industry and to enhance the effectiveness of this policy.
35. The Supreme Court's 2023 ruling on Auckland Council's Provisional LAP indicated that a 9pm closing time (for off-licence premises) was not unreasonable in light of the object of the Sale and Supply of Alcohol Act 2012. The Court also found that the Alcohol Regulatory and Licensing Authority had extensively reviewed the evidence which indicated that changing the closing time to 9pm was likely to reduce alcohol-related harm.⁴⁹
36. There is strong international evidence that shows changes in hours of trade have a significant impact on the volume of alcohol consumed and rates of alcohol-related problems. This research shows that when hours of sale are increased, alcohol consumption and related harms increase and vice versa.⁵⁰ A systematic review of studies found that restricting trading hours of both on- and off-licence premises was typically followed by decreases in the incidence of alcohol-related harm in the form of assault and hospitalisation.⁵¹

⁴⁴ Ministry of Health. (2025). Action on Fetal Alcohol Spectrum Disorder (FASD). Accessed 13 May 2025. Available from: <https://www.health.govt.nz/strategies-initiatives/programmes-and-initiatives/fetal-alcohol-spectrum-disorder>

⁴⁵ FASD Working Group. (2016). Taking action on Fetal Alcohol Spectrum Disorder: 2016-2019: An action plan. 2016. Available from: <https://www.health.govt.nz/system/files/2016-08/taking-action-on-fetal-alcohol-spectrum-disorder-2016-to-2019.pdf>

⁴⁶ Ministry of Health. (2025). Action on Fetal Alcohol Spectrum Disorder (FASD). Accessed 13 May 2025. Available from: <https://www.health.govt.nz/strategies-initiatives/programmes-and-initiatives/fetal-alcohol-spectrum-disorder>

⁴⁷ Romeo, J. S., Huckle, T., Casswell, S., Connor, J., Rehm, J., & McGinn, V. (2023). Foetal alcohol spectrum disorder in Aotearoa, New Zealand: Estimates of prevalence and indications of inequity. *Drug and alcohol review*, 42(4), 859-867.

⁴⁸ Babor, T. F., Casswell, S., Graham, K., Huckle, T., Livingston, M., Österberg, E., ... & Sompaisarn, B. (2022). Alcohol: no ordinary commodity: research and public policy. Oxford: Oxford University Press.

⁴⁹ Supreme Court of New Zealand. (2023). Woolworths New Zealand Limited v Auckland Council. 5 May 2023.

⁵⁰ <https://www.courtsofnz.govt.nz/assets/cases/2023/MR-2023-NZSC-45.pdf>

⁵¹ Babor, T. F., Casswell, S., Graham, K., Huckle, T., Livingston, M., Österberg, E., ... & Sompaisarn, B. (2022). Alcohol: no ordinary commodity: research and public policy. Oxford: Oxford University Press.

⁵¹ Nepal, S., Kypril, K., Tekelab, T., Hodder, R. K., Attia, J., Bagade, T., ... & Miller, 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.

37. NPHS Te Waipounamu notes that Council's early engagement survey did not ask the community about their views on delaying the opening time for off-licenses, from the default opening time of 7am. It is possible that the community might support off-licenses opening later in the day.

Place a freeze on new off-licenses in high deprivation areas

38. NPHS Te Waipounamu supports placing a freeze on granting off-license to new premises in areas that service high deprivation communities. We also support Council's decision that this specific policy will have the same duration as the LAP review cycle (6 years).
39. NPHS Te Waipounamu recommends that this specific policy is extended to include deprivation decile 7 areas, in addition to deciles 8, 9 and 10 (e.g. include both quintiles 4 and 5). The Council's Research Report from January 2025 shows that areas with the second highest levels of deprivation (quintile 4) have the highest proportion of off-licenses. Council has provided us with a breakdown of off-license numbers in each deprivation decile; decile 7 currently has 29 off-licenses while decile 8 has 35 off-licenses. As it stands, the policy may have the unintended effect of increasing the density of off-licence outlets in medium-high deprivation areas by allowing new off-licenses in decile 7 areas.
40. We support regulating the density of off-licence outlets. New Zealand and international evidence demonstrate the relationship between the density of alcohol outlets, communities, and alcohol-related harm. Off-licence premises density is associated with shorter travel distances, longer opening hours and price competition,⁵² which correlates with heavy episodic drinking and alcohol-related problems in communities.⁵³ Restricting the number and location of alcohol outlets can be used to reduce alcohol-related problems by limiting consumption, and limiting the number of licenses can incentivise licensees to comply with restrictions.⁵⁴
41. NPHS Te Waipounamu recommends that Council considers providing guidance in the LAP about how applications for new off-licenses that are on the boundary of areas where a freeze is in place should be dealt with. New off-licenses opening on the boundary of high deprivation areas may exacerbate the alcohol-related harm experienced in these areas and frustrate the intent of the policy. Council may wish to consider that new off-licence applications on the boundaries of the areas subject to the freeze are included within its ambit.
42. We note that new off-licenses where the sale and supply of alcohol is not the primary purpose are exempt from this specific policy. We acknowledge the challenge of restricting the density of alcohol outlets while also ensuring communities have access to food and other essential needs that are available at some off-licence premises, such as supermarkets. However, it is important to note that supermarkets have a significant role in alcohol sales. Research from 2014 shows that supermarkets accounted for 31.2% of all alcohol sales by volume, second only to bottle stores (32.5%).⁵⁵ Furthermore, supermarkets and grocery stores have approximately 30% and 60% market share of all off-licence beer and wine sales in Aotearoa New Zealand, respectively.⁵⁶

⁵² Cameron, M. P., Cochrane, W., McNeill, K., Melbourne, P., Morrison, S. L., & Robertson, N. (2010). The impacts of liquor outlets in Manukau City: Summary report.

⁵³ Connor, J. L., Kypri, K., Bell, M. L., & Cousins, K. (2011). Alcohol outlet density, levels of drinking and alcohol-related harm in New Zealand: a national study. *J Epidemiol Community Health*, 65(10), 841-846.

⁵⁴ Babor, T. F., Casswell, S., Graham, K., Huckle, T., Livingston, M., Österberg, E., ... & Sompaisam, B. (2022). Alcohol: no ordinary commodity: research and public policy. Oxford: Oxford University Press.

⁵⁵ Fairgray, D. & Hampson, N. (2018). New Zealand Alcohol Supply and Demand Structures: Research Report. Health New Zealand. Report. Available from: <https://doi.org/10.60967/healthnz.26785303.v1>

⁵⁶ McEwan, B., Campbell, M., & Swain, D. (2010). New Zealand culture of intoxication: Local and global influences. *New Zealand Sociology*, 25(2), 15-37.

Restricting new bottle stores' proximity to sensitive community facilities

43. NPHS Te Waipounamu supports this specific policy restricting the proximity of new bottle stores from addiction treatment/rehabilitation centres, primary and secondary schools, and the minimum distances proposed for inside the central city, other suburbs and Banks Peninsula. However, we have some recommendations to strengthen this policy.
44. NPHS Te Waipounamu recommends that the sensitive sites policy also extends to early childhood education services (ECEs). Results from Council's early engagement survey showed that 93% of respondents supported restricting bottle stores from being close to early learning centres. We note the decision was made to exclude early childhood education facilities from this policy because the number of these facilities makes the policy difficult to apply. However, we suggest that ECEs are included in this policy to align with community feedback and to help reduce exposure for young children to alcohol and alcohol advertising.
45. The Ministry of Health regulates location requirements for specialist vape retailers. New applications for specialist vape retailers cannot be approved within 100 metres of registered ECEs.⁵⁷ This highlights the importance of reducing children's exposure to businesses that sell harmful commodities, and that it is possible to apply a policy that restricts the distance of such outlets from ECEs.
46. We note that taverns and nightclubs have been removed from the proposed sensitive sites policy. NPHS Te Waipounamu recommends removing the City Centre Zone (CCZ) exemption from this policy. It appears that the intention of this exemption was to recognise the role of the CCZ as the primary destination for dining, nightlife and entertainment in Christchurch. Bottle stores do not contribute to the role of the CCZ in the same way that other on-licenses do, and they increase alcohol harm by supporting alcohol consumption in unlicensed environments, therefore we do not support including this exemption for the CCZ if taverns and nightclubs are not included in this policy.
47. NPHS Te Waipounamu notes that the intention of this specific policy is to reduce the onus on the community to object to applications for new licenses. We recommend that Council engage with communities and organisations who represent sensitive sites to review whether this policy is achieving its intent.

Other comments

48. NPHS Te Waipounamu recommends expanding the content in the LAP document to include the rules which apply to on-licenses, club licenses or special licenses. Currently, the draft LAP includes the three proposed policies but has no information about the rules which apply to on-licenses, club licenses or special licenses. A LAP document is often used as a go-to document for communities, statutory agencies and licensees to understand the rules for the sale and supply of alcohol in a district. Therefore, it would be helpful to expand the LAP document to include all rules, even those that are default rules from the Sale and Supply of Alcohol Act 2012. For example, the Auckland LAP lays out the policies relating to off-licenses, on-licenses, club licenses and special licenses.
49. NPHS Te Waipounamu recommends reducing trading hours for on-license venues. We recommend that on-license venues in the central city area close at 3am, and that on-license venues in suburban areas close at 1am. We support the suggestion from Police that some

⁵⁷ Ministry of Health. (2025). Location requirements for specialist vape retailers. Accessed 09 May 2025. <https://www.health.govt.nz/regulation-legislation/vaping-herbal-smoking-and-smokeless-tobacco/selling-vaping-or-other-notifiable-products/location-requirements-for-specialist-vape-retailers#:~:text=From%2017%20December%202024%20any,metres%20from%20schools%20and%20marae.>

“entertainment precincts” outside of the central city area are allowed to retain 3am closing time, such as Merivale, Addington, Lyttleton and Akaroa.

50. As stated above (at 36) there is strong international evidence that shows when hours of sale are increased, alcohol consumption and related harms increase and vice versa.⁵⁸ Research from Australia has found that later trading hours for on-licenses is associated with increased levels of alcohol consumption, and increased levels of violence⁵⁹ and impaired-driver road crashes.⁶⁰ Furthermore, evidence from Australia also shows that midnight is the pivotal time of night after which alcohol-related intoxication and subsequent harms increase significantly, for example, intoxication and harm increases by between 15 and 20 percent every hour of trading after midnight.⁶¹
51. NPHS Te Waipounamu recommends that the LAP includes a discretionary condition that restricts alcohol advertising and signage at all licensed premises in order to reduce the exposure of children to alcohol marketing. A University of Otago study found that New Zealand children aged 11–13 years were exposed to alcohol marketing on average 4.5 times per day. The study also found that exposure rates were highest among Māori children (5.4 times higher) and Pacific children (3 times higher) compared to New Zealand European children, with boys experiencing twice the amount of exposure of girls.⁶²
52. Research has shown there is a causal relationship between alcohol marketing and drinking among young people.⁶³ Young people’s exposure to alcohol advertising is associated with earlier uptake of drinking and heavy drinking among adolescents who already drink.⁶⁴ A recent poll showed that there is strong public support for safeguarding New Zealanders, especially children, from alcohol advertising. Four in five people (80%) agreed with not allowing alcohol advertising to reach children in any way and 62% agreed with banning alcohol advertising and sponsorship altogether.⁶⁵
53. NPHS Te Waipounamu recommends the inclusion of drink serve limits of a maximum of two drinks per serve per person for special licensed events, particularly large ones. The experience of Police and public health licensing staff in monitoring such events is that controlling the number of serves per person is an effective tool in controlling the risk of intoxication and other alcohol harm.
54. NPHS Te Waipounamu recommends that Club Licence holders are required to have a rostered duty manager present at all times during opening hours to reduce alcohol related harm. Duty managers are certified managers who are responsible for compliance and enforcement of the provisions of the Act, the conditions of the license and the conduct of the premises, with the aim to ensure the safe responsible sale and supply of alcohol and minimise alcohol related harm. This requirement would assist clubs to comply with the obligations of their licence.

⁵⁸ Babor, T. F., Casswell, S., Graham, K., Huckle, T., Livingston, M., Österberg, E., ... & Sompaisarn, B. (2022). *Alcohol: no ordinary commodity: research and public policy*. Oxford: Oxford University Press.

⁵⁹ Chikritzhs, T., & Stockwell, T. (2002). The impact of later trading hours for Australian public houses (hotels) on levels of violence. *Journal of studies on alcohol*, 63(5), 591-599.

⁶⁰ Chikritzhs, T., & Stockwell, T. (2006). The impact of later trading hours for hotels on levels of impaired driver road crashes and driver breath alcohol levels. *Addiction*, 101(9), 1254-1264.

⁶¹ Chikritzhs, T., & Toumbourou, J. (2015). Interventions for reducing alcohol supply, alcohol demand and alcohol-related harm: final report. National Drug Law Enforcement Research Fund: Canberra. Available from: <https://www.aic.gov.au/sites/default/files/2020-05/monograph57.pdf>

⁶² Chambers, T., Stanley, J., Signal, L., Pearson, A. L., Smith, M., Barr, M., & Ni Mhurchu, C. (2018). Quantifying the nature and extent of children’s real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children’s exposure via a range of media in a range of key places. *Alcohol and alcoholism*, 53(5), 626-633.

⁶³ Sargent, J. D., & Babor, T. F. (2020). The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*, (s19), 113-124.

⁶⁴ Alcohol Healthwatch. (2021). *Alcohol Marketing*. Accessed from: https://www.ahw.org.nz/Portals/5/Resources/Fact%20Sheet/2021/Factsheet%20-%20Alcohol%20Marketing%20Feb%202021_1.pdf

⁶⁵ Shields, E., Wright, K., Borland, A., Connor, J., Randerson, S., & Maynard, K. (2025). New Zealanders strongly support policies to curb alcohol harm – will government listen?. Public Health Communication Centre Aotearoa. 12 May 2025. Available from: <https://www.phcc.org.nz/briefing/new-zealanders-strongly-support-policies-curb-alcohol-harm-will-government-listen>

55. NPHS Te Waipounamu recommends that Council includes a policy in the LAP that restricts same day deliveries of alcohol after 7pm. This restriction would assist in countering the ability of off-licences to continue fulfilling remote sales orders for delivery up to 11pm despite being required to close their doors at 9pm.
56. NPHS Te Waipounamu recommends including a policy in the LAP that prohibits the use of 'buy now, pay later' (BNPL) services at off-licence premises. BNPL services increase the economic accessibility of alcohol and may lead to increased alcohol use and harm, as well as financial hardship for vulnerable populations.^{66 67}

Conclusion

57. NPHS Te Waipounamu wishes to be heard with respect to this advice.

Ngā mihi,



Vince Barry
Regional Director
National Public Health Service
Te Waipounamu Region



Dr Cheryl Brunton
Medical Officer of Health
National Public Health Service
Waitaha Canterbury
Te Waipounamu Region

⁶⁶ Alcohol Healthwatch. (2019). Submission to the Ministry of Business, Innovation & Employment on the Buy-Now, Pay-Later discussion document. Accessed from: <https://www.mbie.govt.nz/dmsdocument/18960-alcohol-healthwatch-buy-now-pay-later-submission-pdf>

⁶⁷ O'Brien, L., Ramsay, I., & Ali, P. (2024). Innovation, disruption and consumer harm in the buy now pay later industry: An empirical study. *University of New South Wales Law Journal*, 47(2).

Appendix 1

07 March 2024

Christchurch City Council
PO Box 73012
Christchurch Central, 8013

Tēnā koutou

Submission on Local Alcohol Policy development

1. Thank you for the opportunity to submit on your Local Alcohol Policy development. This submission has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu services the South Island including Ōtautahi Christchurch.
2. NPHS recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956.
3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.
4. This submission responds to the questions in the online survey. This submission sets out matters of interest and concern to NPHS Te Waipounamu, and our recommendations are based on evidence about public health and equity.

General Comments

5. NPHS Te Waipounamu commends Christchurch City Council for developing a Draft Local Alcohol Policy (LAP) to address the availability of alcohol. We also commend Council for engaging community and stakeholders in the process of a developing a LAP.
6. A LAP that reduces the availability of alcohol can reduce alcohol-related harm and improve community wellbeing. LAPs are one option available to local councils to reduce alcohol-related harm, other options include alcohol control bylaws, alcohol licensing fees and other alcohol-related policies. These interventions can reduce alcohol ham in the community, when used effectively and in combination.
7. A multisectoral approach to improving health outcomes, involving local councils and businesses, is needed because many levers to influence health outcomes sit outside the health sector. The alcohol industry operates as a key commercial determinant of health; its

actions contribute to alcohol consumption through the production, marketing, distribution, and sale of alcohol, and can lead to alcohol-related harm.⁶⁸

8. Alcohol-related harm can be broadly defined as both direct and indirect harm to an individual, society or the community caused by the excessive or inappropriate consumption of alcohol and it has many health, social and justice consequences.⁶⁹

9. The legal definition of alcohol-related harm in the Sale and Supply of Alcohol Act (2012) is similarly broad:

the harm caused by the excessive or inappropriate consumption of alcohol; and includes

(i) any crime, damage, death, disease, disorderly behaviour, illness, or injury, directly or indirectly caused, or directly or indirectly contributed to, by the excessive or inappropriate consumption of alcohol; and

(ii) any harm to society generally or the community, directly or indirectly caused, or directly or indirectly contributed to, by any crime, damage, death, disease, disorderly behaviour, illness, or injury of a kind described in subparagraph (i).

10. Alcohol causes more harm than any other drug in Aotearoa New Zealand.⁷⁰ It is estimated that alcohol harm costs New Zealand \$9.1 billion each year (\$4.8 billion of this is due to foetal alcohol spectrum disorder (FASD)).⁷¹ Alcohol causes significant harm to individuals, whānau and communities and is a key driver of health and social inequities.⁷²

11. Alcohol harm places substantial burden on the health system. Alcohol consumption plays a causal role in more than 200 diseases, injuries and other health conditions.⁷³ Drinking alcohol is associated with risks of developing non-communicable diseases such as liver diseases, heart diseases, and different types of cancers, as well as mental health and behavioural conditions such as depression, anxiety and alcohol use disorders. Alcohol consumption also causes significant harm to others, not just to the person consuming alcohol. Harms caused to other people include FASD, injuries, family violence and road crashes.⁷⁴

12. Recent New Zealand research shows that in 2018 alcohol caused an estimated 901 deaths (cancers contributed the greatest number of these deaths, at 376, followed by injuries, at 296), 1,250 cancers (breast cancer and colorectal cancer made up 69% of all alcohol-attributable cancers), 29,282 hospitalisations (injuries accounted for 44% of these), 49,742 Disability Adjusted Life Years, and 128,963 Accident Compensation Corporation claims.⁷⁵

⁶⁸ Institute of Public Health. (2024). *Commercial Determinants of Health*. Accessed from: <https://www.publichealth.ie/commercial-determinants-health>

⁶⁹ New Zealand Law Commission. (2010). *Alcohol in our lives: curbing the harm*. NZLC R114. Wellington: New Zealand Law Commission.

<https://www.lawcom.govt.nz/sites/default/files/project/AvailableFormats/NZLC%20R114.pdf>

⁷⁰ Crossin, R., Cleland, L., Wilkins, C., Rychert, M., Adamson, S., Potiki, T., ... & Boden, J. (2023). The New Zealand drug harms ranking study: A multi-criteria decision analysis. *Journal of Psychopharmacology*, 37(9), 891-903.

⁷¹ NZIER. (2024). *Costs of alcohol harms in New Zealand: Updating the evidence with recent research*. A report for the Ministry of Health. Accessed from: <https://www.health.govt.nz/system/files/2024-06/costs-of-alcohol-harms-in-new-zealand-2may24-v2.docx>

⁷² New Zealand Law Commission. (2010). *Alcohol in our lives: curbing the harm*. NZLC R114. Wellington: New Zealand Law Commission.

<https://www.lawcom.govt.nz/sites/default/files/project/AvailableFormats/NZLC%20R114.pdf>

⁷³ Rehm, J., Ballunas, D., Borges, G. L., Graham, K., Irving, H., Kehoe, T., ... & Taylor, B. (2010). The relation between different dimensions of alcohol consumption and burden of disease: an overview. *Addiction*, 105(5), 817-843. Accessed from: <https://pmc.ncbi.nlm.nih.gov/articles/PMC3306013/pdf/nihms188506.pdf>

⁷⁴ World Health Organization. (2025). Alcohol. Accessed 3 March 2025. <https://www.who.int/news-room/fact-sheets/detail/alcohol>

⁷⁵ Chambers T., Mizdrak A., Jones A.C., Davies, A. Sherk, A. (2024). *Estimated alcohol-attributable health burden in Aotearoa New Zealand*. Wellington, New Zealand. Accessed from: https://healthnz.figshare.com/articles/report/Estimated_alcohol-attributable_health_burden_in_Aotearoa_New_Zealand/27048892

13. The health burden of alcohol affects people across the life course, from before birth to death. Many parts of the health system respond to the diseases and injuries attributed to alcohol, including (but not limited to) emergency departments, midwifery, primary care, oncology, mental health and addiction services.
14. Over the period from 2019 to 2021, the rate of hospitalisations in Christchurch City that were wholly attributable to alcohol was 85.2 per 100,000 population aged 15 years and over.⁷⁶ Christchurch had the highest average hospitalisation rate for conditions wholly attributable to alcohol for this period; this was statistically significantly higher than the rates for Auckland and Wellington, and the rate for New Zealand overall.
15. Approximately 20% of people in Canterbury over the age of 15 years report drinking at a level that is hazardous to their health.⁷⁷ This equates to more than 139,000 people in our region who are considered hazardous drinkers. The more alcohol that is consumed, the greater the risk of alcohol-related diseases and injuries, which result in preventable costs to the health, social development, and justice systems.
16. Alcohol harm is not equitably distributed among Canterbury residents. Hazardous drinking is most prevalent among those aged 15 to 24 years and 25 to 44 years, men, Māori, and Pacific peoples.⁷⁸ The resulting health inequities are particularly evident at a national level, where the death rate attributable to alcohol is more than twice as high for Māori than non-Māori.^{79 80}

Specific Comments

17. This section responds to some of the questions from the online survey.

Reducing trading hours for off-license outlets

18. NPHS Te Waipounamu strongly supports reducing trading hours for off-license outlets across the city and Banks Peninsula to reduce alcohol harm. We recommend that off-license outlets close at 9pm.
19. We recommend that all off-license outlet types close at the same time to take a consistent approach to reducing alcohol availability from off-licenses, and to support the effectiveness of this policy. Reducing trading hours for some off-license types only may have unintended consequences, such as people travelling further to purchase alcohol and giving some outlets a competitive advantage.
20. NPHS Te Waipounamu also recommends that Council considers delaying the opening time of all off-license outlet types. We recommend an opening time of 9.00am for all off-license types.

⁷⁶ Environmental Health Intelligence New Zealand. Alcohol-related harm indicators. Accessed from: <https://ehinz.ac.nz/indicators/alcohol-related-harm/about-alcohol-related-harm/#alcohol-related-harm-indicators>

⁷⁷ Ministry of Health. (2021). Regional Data Explorer 2017–2020: New Zealand Health Survey. Accessed from: <https://minhealthnz.shinyapps.io/nz-health-survey-2017-2020-regional-update>

⁷⁸ Ministry of Health. (2021). Regional Data Explorer 2017–2020: New Zealand Health Survey. Accessed from: <https://minhealthnz.shinyapps.io/nz-health-survey-2017-2020-regional-update>

⁷⁹ Chambers T., Mizdrak A., Jones A.C., Davies, A. Sherk, A. (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Wellington, New Zealand. Accessed from: <https://www.hpa.org.nz/sites/default/files/Alcohol%20Attributable%20Fractions%20report%20-%20finalF.pdf>

⁸⁰ Randerson S, Wright K, Connor J. (2024). Local alcohol policies: What's the opportunity to reduce harm. Public Health Communication Centre Aotearoa. 23 October. Accessed from: <https://www.phcc.org.nz/briefing/local-alcohol-policies-whats-opportunity-reduce-harm>

21. Most alcohol-related harm is associated with off-licences, therefore we strongly recommend measures restricting the availability of alcohol through off-licenses to reduce alcohol-related harm. In New Zealand, over 75% of total alcohol consumed is from off-licences.⁸¹ This means that most alcohol is purchased from premises that are easy to access, such as supermarkets, where alcohol is relatively cheap and usually consumed in situations where there may be little control or supervision.⁸²
22. Evidence supports reducing trading hours as an effective policy measure for reducing the availability of alcohol and alcohol harm. For example, in New Zealand, reduced trading hours have been shown to result in a reduction in Police-documented nocturnal assaults.⁸³
23. Longer trading hours can increase alcohol consumption and help create and sustain hazardous drinking behaviours. New Zealand research has shown that the purchase of alcohol from an off-licence premises after 10.00pm was approximately twice as likely to be made by heavier drinkers.⁸⁴ In addition, research has found that 72% of drinking occasions among high-risk drinkers occur at locations other than on-licensed premises.⁸⁵
24. Shorter trading hours for off-licences compared to on-licences could help to reduce opportunities for "pre-loading" (i.e. drinking before attending a licensed venue) or "post-loading" (i.e. also known as backloading where drinking occurs after attending a venue) or "side-loading" (i.e. drinking while travelling between venues). This occurs by decreasing the chance that people purchase further alcohol once they are already intoxicated or influenced by alcohol.⁸⁶

Reducing trading hours for on-licence venues in suburban areas at night

25. NPHS Te Waipounamu supports reducing the latest closing time for on-license outlets in suburban areas. We also recommend that on-license venues in suburban areas close at 1.00am.
26. Reducing trading hours for on-license venues in suburban areas may reduce disruption to residential areas. Evidence suggests that closing bars and pubs earlier leads to fewer physical harms including assaults,⁸⁷ injuries and vehicle crashes.^{88 89}

⁸¹ Torney, A., Room, R., Jiang, H., Huckle, T., Holmes, J., & Callinan, S. (2024). Where do high-risk drinking occasions occur more often? A cross-sectional, cross-country study. *Drug and alcohol review*.

⁸² Alcohol Healthwatch. (2024). A guide to inform Local Alcohol Policy development. Auckland, New Zealand: Alcohol Healthwatch. Accessed from:

<https://www.ahw.org.nz/Portals/5/Resources/Documents-other/2024/AL1247%20Guide%20to%20inform%20local%20alcohol%20policy%20development%20October%202024.pdf>

⁸³ Connor, J., MacLennan, B., Huckle, T., Romeo, J., Davie, G., & Kypri, K. (2021). Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data. *Addiction*, 116(4), 788-798.

⁸⁴ Casswell, S., Huckle, T., Wall, M., & Yeh, L. C. (2014). International alcohol control study: pricing data and hours of purchase predict heavier drinking. *Alcoholism: clinical and experimental research*, 38(5), 1425-1431.

⁸⁵ Torney, A., Room, R., Jiang, H., Huckle, T., Holmes, J., & Callinan, S. (2024). Where do high-risk drinking occasions occur more often? A cross-sectional, cross-country study. *Drug and alcohol review*.

⁸⁶ New Zealand Law Commission. (2010). *Alcohol in our lives: curbing the harm*. NZLC R114. Wellington: New Zealand Law Commission.

<https://www.lawcom.govt.nz/sites/default/files/projectAvailableFormats/NZLC%20R114.pdf>

⁸⁷ Connor, J., MacLennan, B., Huckle, T., Romeo, J., Davie, G., & Kypri, K. (2021). Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data. *Addiction*, 116(4), 788-798.

⁸⁸ Nepal, S., Kypri, K., Tekelab, T., Hodder, R. K., Attia, J., Bagade, T., ... & Miller, 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.

⁸⁹ Wilkinson, C., Livingston, M., & Room, R. (2016). Impacts of changes to trading hours of liquor licences on alcohol-related harm: a systematic review 2005-2015. *Public Health Research & Practice*. 2016;26(4):e2641644. <http://dx.doi.org/10.17061/phrp2641644>

Placing a temporary freeze on new licensed venues and outlets in high deprivation areas

27. NPHS Te Waipounamu supports introducing a temporary freeze on new licensed venues and outlets in high deprivation areas to address alcohol availability in these areas. We have some recommendations to strengthen this policy.
28. We note that Auckland Council has implemented a similar temporary freeze policy, which also includes a rebuttal presumption. This means that there should be a presumption against the issuing of new off-licences immediately following the expiry of the temporary freeze. Applications for new licences should be refused in the specified areas, however, this presumption may be rebutted by applicants. We recommend that Council considers including a rebuttal presumption in this policy to ensure the intended effect to reduce alcohol availability in high deprivation areas continues beyond the duration of any temporary freeze.
29. NPHS Te Waipounamu also recommends that the Council considers including areas of medium-high deprivation (deciles 7 to 8) in addition to areas of high deprivation (deciles 9 to 10) in the temporary freeze. The Council's Research Report shows that medium-high deprivation areas have the highest proportion of licenses, for all license types (on, off and club licenses). Extending this policy to include medium-high deprivation areas will address the concentration of outlets and venues in these areas.
30. We note that the temporary freeze in the Auckland LAP applies to 'priority overlay areas'. These areas have priority status as they have high levels of alcohol-related crime, high numbers of people that experience excessive harm from alcohol, and high numbers of existing alcohol licences. NPHS Te Waipounamu recommends that Council considers using crime, health, license and demographic data, in addition to deprivation, to determine areas to implement a temporary freeze. Considering these data will highlight areas where alcohol harm currently has a cumulative impact.
31. NPHS Te Waipounamu recommends that the Council considers extending the duration of the temporary freeze to up to six years. A longer duration will allow more time to see whether the intended effects of this policy of reducing alcohol availability in high deprivation areas have been realised. In addition, local councils are required to review LAPs every six years so extending the duration of the temporary freeze would align with policy review timeframe.

Restricting new licensed venues and outlets from being located near community facilities considered sensitive

32. NPHS Te Waipounamu supports restricting new license venues and outlets from being located within 100m of sensitive sites.
33. NPHS Te Waipounamu supports applying this restriction to early childhood centres, primary and secondary schools, addiction/rehabilitation facilities, marae and places of worship. We recommend that Council includes kura kaupapa and kōhanga reo in the definitions of early childhood centres and primary and secondary schools.
34. NPHS Te Waipounamu recommends that this restriction is also applied to recreational facilities, including community facilities, playgrounds, parks and reserves, because these

sites are often used by families and children. Including parks as sensitive sites may also support alcohol control bylaws that have been applied to these facilities.⁹⁰

35. NPHS Te Waipounamu recommends that this restriction is also applied to hospitals.
36. We acknowledge the importance of community voice to inform which community facilities are included as sensitive sites. We recommend that Council engage with local marae to understand perspectives on alcohol availability, alcohol-harm and the sensitive site policy.
37. There is a strong association between alcohol outlet proximity and alcohol harm (increased proximity increases harm).⁹¹ Adopting proximity controls around sensitive sites will help to reduce exposure to advertising and accessibility of alcohol for vulnerable population groups that frequent sensitive sites.
38. Protecting users of sensitive sites can assist in addressing their disproportionate and inequitable exposure to alcohol and experience of alcohol harms. For example, hazardous drinking among past-year drinkers in the Canterbury region is prevalent among a quarter of young adults aged 15 to 24.⁹² Therefore, restricting licensed premises around schools could have positive outcomes for youth who are affected by hazardous drinking.

Introduce a one-way door restriction for venues near closing time

39. NPHS Te Waipounamu supports introducing one-way door restrictions. One-way door restrictions 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. These conditions also have the potential to reduce the burden on Police, ambulance and hospital services.
40. NPHS Te Waipounamu notes that there is mixed evidence to support one-way door restrictions and acknowledges the importance of one-way door restrictions being part of a comprehensive programme to reduce alcohol-related harm. We encourage Council to also consider reducing trading hours for on-license venues. As highlighted above, reducing trading hours of on-license venues can lead to fewer physical harms including assaults, injuries and vehicle crashes. There is stronger evidence to support the effectiveness of reducing trading hours, compared to the effectiveness of one-way door restrictions.⁹³

Other mechanisms to help reduce alcohol harm

41. NPHS Te Waipounamu is part of the Christchurch Alcohol Harm Partnership, alongside Council and NZ Police (formerly called the Christchurch Alcohol Action Plan). Christchurch Alcohol Harm Partnership (CAHP) is a collaboration that aims to support regulatory alcohol work with non-regulatory initiatives. CAHP can support and coordinate efforts to reduce alcohol harm with initiatives that fall outside the scope of LAP.

⁹⁰ Alcohol Healthwatch. (2024). A guide to inform Local Alcohol Policy development. Auckland, New Zealand: Alcohol Healthwatch. Accessed from: <https://www.ahw.org.nz/Portals/5/Resources/Documents-other/2024/AL1247%20Guide%20to%20inform%20local%20alcohol%20policy%20development%20October%202024.pdf>

⁹¹ Hobbs, M., Marek, L., Wiki, J., Campbell, M., Deng, B. Y., Sharpe, H., ... & Kingham, S. (2020). Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand. *Health & Place*, 65, 102397.

⁹² Ministry of Health. (2021). Regional Data Explorer 2017–2020: New Zealand Health Survey. Accessed from: <https://minihelthnz.shinyapps.io/nz-health-survey-2017-2020-regional-update>

⁹³ Babor, T. F., Casswell, S., Graham, K., Huckle, T., Livingston, M., Österberg, E., ... & Sompalsam, B. (2022). *Alcohol: no ordinary commodity: research and public policy*. Oxford: Oxford University Press.

Further comments

42. NPHS Te Waipounamu recommends that the LAP includes a policy preventing new licensed premises from being located in close proximity to other licensed premises. Setting a distance rule would address the harm associated with the clustering of premises. For example, this measure could prevent off-licensed premises from being established within 50 or 100 metres of an existing off-licensed premises.
43. NPHS Te Waipounamu recommends that the LAP includes a policy to restrict alcohol advertising and signage at licensed premises. Research has found there is a causal relationship between alcohol marketing and drinking among young people.⁹⁴ Young people's exposure to alcohol advertising is associated with earlier uptake of drinking and heavy drinking among adolescents who already drink.⁹⁵
44. We recommend adopting a policy in the LAP that prohibits the use of 'buy now, pay later' (BNPL) services at licenced premises. BNPL services increase the economic accessibility of alcohol and may lead to increased alcohol use and harm, as well as financial hardship for vulnerable populations.^{29 30}
45. NPHS Te Waipounamu recommends the inclusion of drink serve limits of a maximum of two drinks per serve per person for special licensed events. Controlling the number of serves per person at an event is an effective tool in controlling the risk of intoxication at events.

Conclusion

46. NPHS Te Waipounamu is keen to engage further with Council and contribute to the development of the LAP.
47. NPHS Te Waipounamu have engaged with other parts of Te Whatu Ora – Waitaha wish to share their perspectives on the impacts of alcohol harm on the health system. We can support and facilitate engagement between these healthcare professionals and Council.
48. Thank you for the opportunity to submit on the Local Alcohol Policy development.

⁹⁴ Sargent, J. D., & Babor, T. F. (2020). The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*, (s19), 113-124.

⁹⁵ Alcohol Healthwatch. (2021). *Alcohol Marketing*. Accessed from: https://www.ahw.org.nz/Portals/5/Resources/Fact%20Sheet/2021/Factsheet%20-%20Alcohol%20Marketing%20Feb%202021_1.pdf

Ngā mihi,



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Christchurch Police

Submissions to Council on draft *Local alcohol policy*

Attention:



Senior Engagement advisor

Christchurch City Council

Thank you for the opportunity for Police to provide additional submissions in respect of the draft LAP.

I'll address the listed aspects of the policy in turn:

Do Police wish to appear and speak to your submission at the hearing:

We would very much appreciate the opportunity to speak directly to Council on the Police submissions. If possible – we would appreciate being scheduled to appear at an early stage in the process.

Do you support the proposal to reduce all off-licensed retailers' maximum trading hours to 9pm across Christchurch and Banks Peninsula?

Yes. This is a matter that is particularly focus for Police. The propensity for alcohol related harm to continue later into the evening / early morning is well recognised and impacts directly on Police demand and resourcing. Police recommend that the 9pm closing be applied to off licences of **all** types – including bottle stores and grocery stores / supermarkets.

The associated health and behavioural research in that regard is well-recognised.

In particular – the ability for consumers to make a “second purchase decision” or purchase alcohol later in the evening is, in the Police submission, a considerable risk worthy of Council mitigation.

To that end – Police additionally recommend that Council consider the imposition of and associated condition 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*.



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). Applicants who can show that their primary purpose is not the sale and supply of alcohol may apply for an exemption.

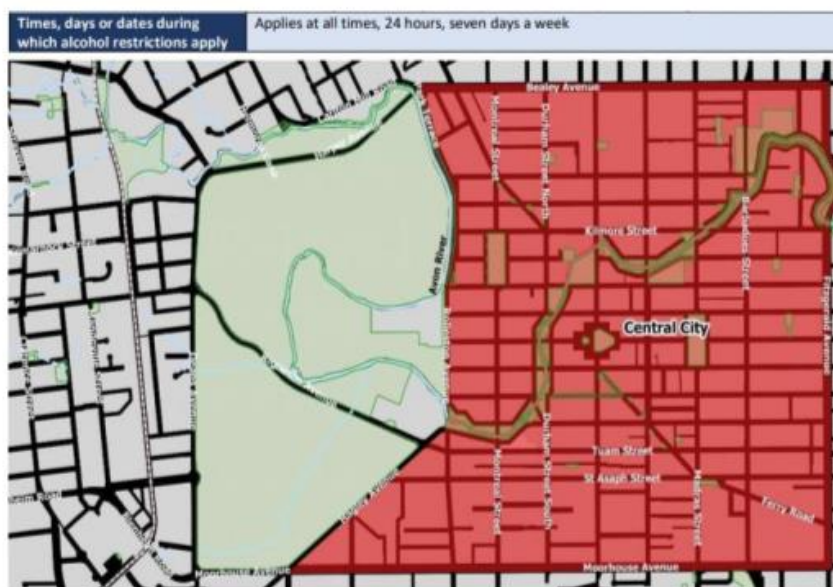
Police recommend that this condition be imposed, but that it be extended to include deprived areas with a decile ranking of **7-10**. While that has not previously been proposed by Police – we now note that decile 7 areas within Christchurch currently have a similar (high) number of off licences premises to ones of decile 8 and above.

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)

Yes – albeit Police **do not believe** that the central city (inside the 4 avenues) should be exempt to this.

The CCC Alcohol Restrictions in Public Places Bylaw 2018 restricts the possession and carriage of alcohol in the following places relevant to this condition:

1. A 24-hour alcohol ban area exists within the CBD area (as shown).



2. An alcohol ban area exists within the Hagley Park and environs area from 10pm to 7am daily (as shown):



(Images shown are as reflected in the council website:

<https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Bylaws/alcohol/2023-Amended-Alcohol-Restrictions-in-Public-Places-Bylaw.pdf>)

Police recognise and support the Council's efforts to ensure Christchurch has a vibrant entertainment sector – and that the central city is often at the heart of that.

But, in our submission, that must be balanced against any excessive availability of alcohol which increases the **risk of alcohol related harm**. Council must also recognise relevant societal trends – including the alcohol consumption habits of residents and visitors.

While On Licences premises in the city, when operated in compliance with SSAA 2012 and by responsible management, provide 'safe' and controlled environments for alcohol to be consumed responsibly and under a level of supervision – the same 'duty of care' for patrons cannot easily be extended when they are not on premises.

Council will recognise the current, to a degree prevalent, tendency for people to undertake additional consumption of alcohol (off the premises) by way of:

3. Pre-loading (consumption of alcohol elsewhere before attending licensed premises).
4. Side-loading (intermittent consumption of alcohol at locations nearby licensed premises)

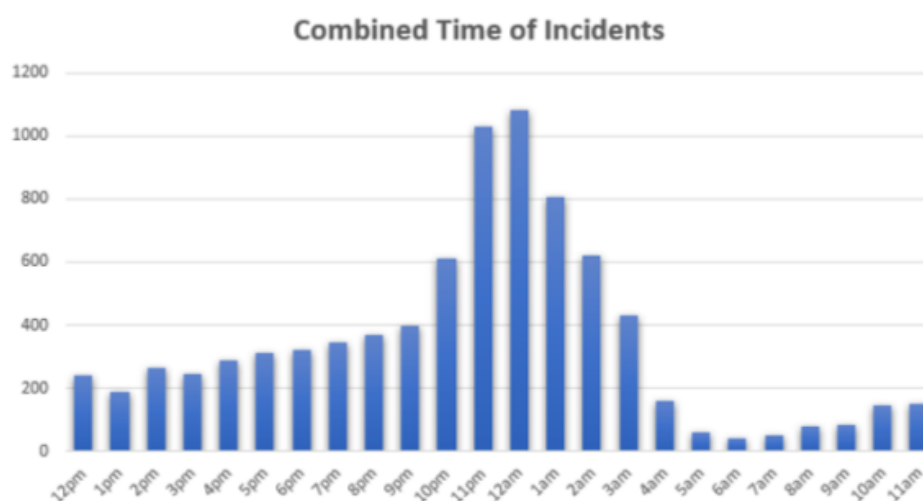


The resulting harm arising from excessive consumption of alcohol, particularly within the central city areas, is readily apparent:

- Police ACF data (incidents where *alcohol* is identified as a *contributing factor*) reflects a very high level of related incidents occurring within the 4 avenues.

Example:

The following graph reflects total ACF incidents, **by time of day**, over a 5-year period – for the area within a 1km radius of the Central Bus Exchange. In excess of 8300 incidents were recorded during this time (2020-2025).



ACF in the area has a consistent demand between 10pm-3am which peaks at 12am.

ACF are at their lowest in the morning between 5am and 9am.

- It is apparent that excess consumption is a significant driver of crime in the area – including violence, sexual assaults, disorder, driving while affected by alcohol and family harm.
- Police can additionally evidence deliberate breaching of the central city alcohol ban by attendees of large-scale public events in the North Hagley Events triangle.

The Police view is that off licence premises within the CBD can empower individuals to consume alcohol irresponsibly – giving rise to the above behaviours.

Off licences within the area should be significantly restricted – with no new licences issued and tighter restrictions on operating hours.

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?

416



Again, Police support this condition in principle – but **not with any exemption applied to the CCZ** for the reasons outlined above.

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 (including, but not limited to, Akaroa, Lyttelton, Diamond Harbour, Governors Bay, Little River and Duvauchelle)?

Yes.

Other:

A comprehensive report / presentation in relation to Police: ACF data within the CBD will be presented to Council as part of the consultation hearing process. If you require further information in that regard please let me know

Yours etc,

Dave Robertson

Sergeant G032

Christchurch Police

Karakia Whakamutunga

Kia whakairia te tapu

Kia wātea ai te ara

Kia turuki whakataha ai

Kia turuki whakataha ai

Haumi e. Hui e. Tāiki e