

Draft Local Alcohol Policy 2013

Summary and analysis of submissions received during the Special Consultative Procedure, from 31 May – 1 July 2013

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1. Introduction

This report is a summary and analysis of submissions on the Christchurch City Council's draft Local Alcohol Policy, prepared under the Sale and Supply of Alcohol Act 2012 (the Act).¹

Overview of submissions

The Council received a total of 4,060 submissions on the LAP; 1,053 submissions through the Council's Have Your Say process; 1,929 from submissions based on Hospitality New Zealand's Facebook survey and 1,078 submissions based on the 'Chch Late' Facebook petition.

Submissions were received from 161 groups and organisations. They included statutory bodies such as the Police, Canterbury District Health Board and Community Boards; business and industry groups on behalf of a range of hospitality, retail and tourism interests; health sector organisations; community and neighbourhood groups and organisations representing Māori and youth interests (see Appendix 2). All other submissions were assumed to be from individuals though, from the nature of their comments, quite a number of these were writing as individual licensees or business owners.

A large number of off- and on-licensees, hospitality staff and providers of live entertainment submitted, writing candidly about their business and work experiences, their contribution to the city's livelihood and lifestyle, and their vision for a rebuilt central city, in particular. Many health and social service professionals and staff, residents and representatives of local neighbourhoods likewise made submissions, detailing their experiences in dealing with the incidence and aftermath of alcohol-related behaviour and harm.

Almost all submissions addressed 'the licensing matters' that the Act says can be included in a LAP: 'opening' hours; the location; density and proximity to facilities of premises; one-way-door controls; and discretionary conditions. There was a huge diversity of views expressed and also a breadth of manner in which these views were expressed, from detailed well-reasoned discussions to submissions which simply ticked the boxes for agree/disagree statements.

In addition to matters that can be included in the LAP under the Act, some submitters wanted the Council to have policies or undertake actions which sit outside the LAP and fall into 'non-licensing matters' under the Act. Although these submission points can't be addressed through the policies of a LAP, this summary analysis notes matters which the Council may choose to address through other means e.g. through an alcohol strategy.

Matters which were out of scope of the draft LAP

The following matters raised by submitters were out of scope of the draft LAP but could be included within an alcohol strategy:

- Voluntary accords between licensees, the Council and the Police.
- Co-ordination and improvements to late-night transportation options especially taxi services with regard to availability, price and better security.
- Work with venue managers on local accords for the management of entertainment precincts.
- Sharing of information with and between licensees.
- Additional alcohol ban areas and better enforcement of alcohol ban areas.
- Provision or support of late-night activities and entertainment which are not focussed on alcohol.
- Improved street cleaning and rubbish collection in entertainment precincts.
- Advocacy to the Government e.g. on alcohol minimum pricing and advertising.
- Better police enforcement of existing laws.
- Education initiatives e.g. social marketing campaigns about preloading.
- Collaboration with venue managers and event organisers to continuously improve alcohol management.

¹ Note: Best efforts have been made to provide an accurate analysis of submissions, but given the number of submissions received and the time available for producing this report there may be a degree of error. Submitters did not always express a clear view in support or opposition to a proposal. This report focuses on comments where a clear view was discernable.

There were in addition a number of submissions which sought policies/actions which could not be included in either the LAP or in an alcohol strategy as they would require changes to the current law. They include:

- Additional opportunities for people to comment on or object to applications for licenses.
- Removal of alcohol from sale at supermarkets.
- A raised drinking age.
- Changes to drink driving limit.
- Laws against being intoxicated in public.
- Price restrictions (minimum price at off-licences, maximum price at on-licences).
- Limits on the amount of alcohol sold.
- RTD sales restrictions.
- Restrictions on the advertising and marketing of alcohol.

2. Background to the proposal

In February 2013 the Christchurch City Council decided to prepare a Local Alcohol Policy (LAP) for Christchurch City. The Sale and Supply of Alcohol Act 2012 (the Act) allows Councils such as the Christchurch City Council to develop Local Alcohol Policies (LAPs) for their territorial area. A LAP is a set of policies made by a Council in consultation with its community concerning the licensing of premises for the sale and supply of alcohol. Once a LAP is in place, the local District Licensing Committee and the national Alcohol Regulatory and Licensing Authority must have regard to the LAP when making decisions on licence applications.

A LAP can only deal with matters relating to licensing; through a LAP, communities are able to set the direction on some or all of the following matters:

- The location of licensed premises near certain types of facilities, such as in specific neighbourhoods or near schools or churches.
- The density of licensed premises by specifying whether further licences or types of licences should be issued for premises in the district or in a particular area.
- 'One-way door' conditions for licensed premises that would allow patrons to leave premises but not enter or re-enter after a certain time.
- Discretionary conditions in a licence.
- Restrictions or extensions to the maximum trading hours set in the new Act which are: 8am - 4am for on-licences (such as pubs and restaurants) and 7am - 11pm for off-licences (such as bottle stores and supermarkets).

In addition, a LAP may apply differently to different kinds of licensed premises.

3. The draft LAP

The draft LAP for Christchurch City contains the following types of licensing policies:

- Variations on the maximum trading hours set in the Act for on-licences and for off-licences.
- Different maximum trading hours for on-licenses in different areas of the city.
- One-way door conditions for premises holding on-licences. These will be mandatory in certain areas of the city and discretionary in other areas.
- Various discretionary conditions for on-licences, off-licences, club licences and special licences.
- Restrictions on the location of new bottle stores and taverns to business zones.

The Council considered a range of policy options when it was preparing the draft. The Council consulted the Police, the Medical Officer of Health and the Licensing Inspectors in the preparation of the draft LAP. Before and during the preparation of the draft, the Council sought the views of the community about alcohol licensing matters through surveys of public opinion, forums and workshops for identified stakeholders, staff attendance at Community Board workshops, and through meetings with a wide range of interested parties, including residents' groups, industry representatives, and health and community workers.

As required by the Act the Council had regard to the following matters when it prepared the draft LAP:

- The objectives and policies of its district plan; and

- The number of licences of each kind held for premises in its district, and the location and opening hours of each of the premises; and
- Any areas in which bylaws prohibiting alcohol in public places are in force; and
- The demography of the district's residents; and
- The demography of people who visit the district as tourists or holidaymakers; and
- The overall health indicators of the district's residents; and
- The nature and severity of the alcohol-related problems arising in the district.

4. Reasons for the proposal

Christchurch City Council decided to prepare a draft LAP in order to provide locally relevant policies for licensing within Christchurch City. The Council recognised that within the community there is considerable concern about the effects of excessive and inappropriate drinking. The preliminary consultation demonstrated that there is a real desire by the community to be involved in setting local policies on licensing premises, to best serve our city. The Council views a LAP for Christchurch City as an important tool to assist the District Licensing Committee in making its decisions and to help in the achievement of the object of the Act.

The object of the Act is that:

- (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.

Under the Act, 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).

5. Goals of the draft LAP

The draft LAP provides direction for the District Licensing Committee so that licensing decisions:

- Contribute to Christchurch being a safe and healthy city;
- Reflect local communities' character and amenity and their values, preferences and needs;
- Contribute to the recovery of a liveable, attractive city; and
- Encourage licensed environments that foster positive, responsible drinking behaviour and minimise alcohol-related harm.

6. Key components of the draft LAP

- A closing time of 3am in the Central City entertainment precincts (excluding Victoria Street) for taverns, bars, pubs, night-clubs and clubs, with a one-way door policy from 1am.
- A closing time of 1am elsewhere in the Central City (including Victoria Street) for taverns, bars, pubs, night-clubs and clubs, with a discretionary one-way door policy where appropriate.
- A closing time of 1am in suburban centres in the city for taverns, bars, pubs, night-clubs and clubs, with a discretionary one-way door policy where appropriate.
- Maximum trading hours for selling alcohol of 9am until 9pm for all off-licences in Christchurch.
- Restrictions on the location of new bottle stores and taverns to business zones.
- Maximum trading hours of 8am until 1am for restaurants and cafes throughout the city.

7. Consultation on the draft LAP

The public consultation period for the draft Policy was from 31 May 2013 to 1 July 2013. At the start of the consultation the Statement of Proposal and an accompanying letter from Alan Bywater, Strategic Policy Unit Manager were mailed out to 1,248 licensees and emailed to 322 of these whose email addresses were available. This information was also sent to approximately 150 other key stakeholders, and also to all residents' associations and Community Boards. Christchurch City Council libraries and service centres had multiple copies of all consultation documents available.

Research First, the company that carried out the Community Survey in 2012, posted out a flier and letter to 1,602 people who had completed the Survey and for whom they had correct postal addresses. This information was confidential to Research First.

Also at the start of the consultation all Christchurch high schools and a range of youth-focused organisations were sent the link to the Statement of Proposal, an email introduction and collateral material. They were asked to put a link to the CCC Facebook page on their respective Facebook pages and a set of prompt questions was included, for possible use in classroom discussions.

There was advertising about the consultation in The Press, local community newspapers (including ethnic papers), regular media releases to citywide and community newsletters and papers to sustain interest in the consultation, frequent advertisements on Facebook (specifically targeting Christchurch users in a younger demographic) and The Press online site and radio advertisements; and posters were distributed to a wide range of public venues, including cafes and notice boards in community spaces.

In addition to the Have Your Say website and printed consultation documents, staff attended 28 different information sessions (see Appendix 1). Ten drop-in sessions were held: three public information sessions at CPIT Marae, Te Puna Wanaka, Coventry Street (five attendees); North City Church, 95a Sawyers Arms Road (four attendees); and the Cashmere Club (20 attendees). Three drop-in sessions were held at Malls: The Hub, Hornby; Eastgate; and South City. Further drop-in sessions were held at the University of Canterbury, the Lyttelton Farmers Market, and Parklands and New Brighton Libraries. Organised sessions were held with the Riccarton Ilam Community Safety Joint Working Party, the Migrant Forum, and the Halswell Residents' Association. The remaining 15 organised sessions were a mixture of Network, Liaison, and Advisory Group meetings.

Considerable collateral was available at each session. There was a stand-up banner for the drop-in sessions. There were DLE flyers and posters with the key components of the Policy; dates, times and places of public information and drop-in sessions. The flyers also included information on how to make a submission. Many organisations at the Network, Liaison, and Advisory Group meetings took a number of flyers and posters to distribute and display at their places of work.

The consultation document included the Summary of Information, the Statement of Proposal with the draft LAP provisions and a Central City map showing the proposed different opening and closing times for taverns, bars, pubs, clubs and night-clubs; other policy options considered by the Council and reasons why these were not included in the draft Policy; Frequently Asked Questions; and the Submission Form. The Frequently Asked Questions and the Submission Form were also available as stand-alone items.

8. Analysis of submissions

Have Your Say

The Consultation Document provided for submissions to be made through the Have Your Say website, by email or in writing either on the submission form or on plain paper.

Have your Say submissions lodged:

Through the Council website or by email:	749
Hard copy submission form:	<u>304</u>
Total:	1,053

The Have Your Say Submission Form provided submitters with five questions. The first question had eight subsections, each with a three-scale response option (Agree, Neither agree or disagree, Disagree), the opportunity to give reasons for their answers if they disagreed, as well as the opportunity to say what they would like the provisions to be changed to. Question 2 had the same three-scale response option. Questions 3 and 4 asked what submitters thought about the aspects of the draft LAP and Question 5 asked for any other comments.

The questions were:

Q1 Please indicate your level of satisfaction with the following provisions in the draft LAP.

- (a) The proposed maximum trading hours for on-licensed premises such as bars, taverns, clubs and night-clubs in the Central City.
- (b) The proposed maximum trading hours for on-licensed premises such as bars, taverns, clubs and night-clubs in other parts of the city, including Lyttelton, Akaroa and Victoria Street.
- (c) The proposed maximum trading hours for on-licensed premises such as restaurants and cafes in all parts of the city.
- (d) The proposed maximum trading hours for off-licensed premises such as supermarkets, bottle stores and grocery stores in all parts of the city.
- (e) The proposed one-way door restrictions on bars and night-clubs in the Central City.
- (f) The proposed controls on the location of new bottle stores.
- (g) The proposed controls on the location of new taverns.
- (h) The proposed special licence and discretionary conditions.

Q2 Overall, do you support the direction of the draft Local Alcohol Policy?

Q3 What are the best aspects of the draft Local Alcohol Policy?

Q4 What aspects of the draft Local Alcohol Policy do you think need to be changed?

Q5 Do you have any other comments either about the content of the draft Local Alcohol Policy or about other matters which you want included in the Local Alcohol Policy?

Hospitality New Zealand and Chch Late submissions

During this consultation submitters made wide use of social media. Hospitality New Zealand had a series of questions on their Facebook page which submitters could answer through Survey Monkey. This attracted 1,929 submitters. The Chch Late Facebook page had a submission form with a series of questions with 'Yes' as the pre-filled answers to all questions except for the last one which asked for submitters' further comments. This attracted 1,078 submitters. Summaries of these submissions are given below in sections 8.3 and 8.4.

Other social media

During June there were numerous articles in The Press on the proposed policy. Articles were written from the position of the police, hospital, bar owners, young people and other sector interest groups. Some online versions of feature articles received over 200 comments within a day of publishing. Comments were frequently made to support or disagree with other comments that were made. The Press also ran online polls alongside the articles asking people how they felt about particular aspects of the policy. The results of the polls appeared to support the proposed LAP.

8.1. Summary of Have Your Say submissions

The questions asked on the submission form that accompanied the Statement of Proposal were:

Q1 Please indicate your level of satisfaction with the following provisions in the draft LAP.

- (a) The proposed maximum trading hours for on-licensed premises such as bars, taverns, clubs and night-clubs in the Central City.
- (b) The proposed maximum trading hours for on-licensed premises such as bars, taverns, clubs and night-clubs in other parts of the city, including Lyttelton, Akaroa and Victoria Street.
- (c) The proposed maximum trading hours for on-licensed premises such as restaurants and cafes in all parts of the city.
- (d) The proposed maximum trading hours for off-licensed premises such as supermarkets, bottle stores and grocery stores in all parts of the city.
- (e) The proposed one-way door restrictions on bars and night-clubs in the Central City.
- (f) The proposed controls on the location of new bottle stores.
- (g) The proposed controls on the location of new taverns.
- (h) The proposed special licence and discretionary conditions.

Q2 Overall, do you support the direction of the draft Local Alcohol Policy?

Q3 What are the best aspects of the draft Local Alcohol Policy?

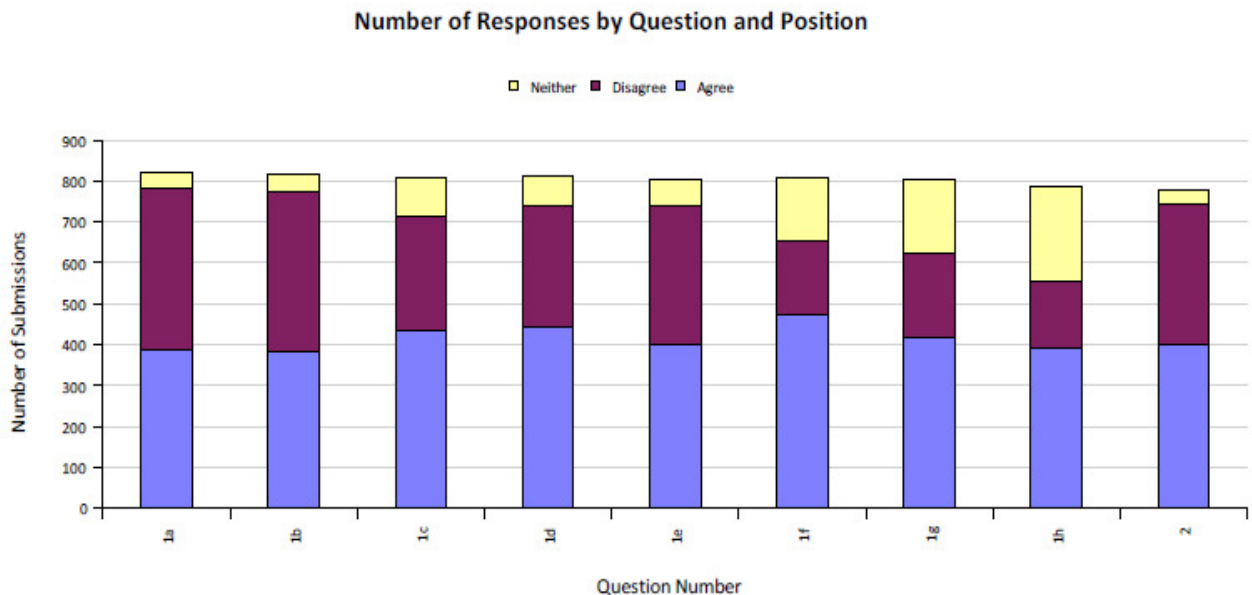
Q4 What aspects of the draft Local Alcohol Policy do you think need to be changed?

Q5 Do you have any other comments either about the content of the draft Local Alcohol Policy or about other matters which you want included in the Local Alcohol Policy?

(a) Agree, Disagree, Neither agree nor disagree responses

For Question 1 (a) – (h) and Question 2, submitters were asked to show that they either Agreed, Disagreed, or Neither agreed or disagreed. They could then add comments if they wished (see section 8.2 (b) below). Graph 1 show the responses for questions 1(a) – (h) and question 2.

Graph 1

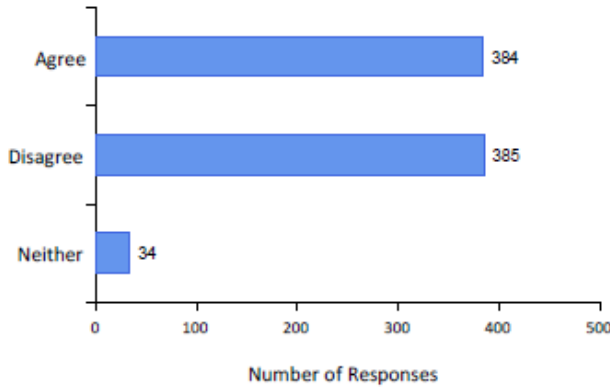


	1-a	1-b	1-c	1-d	1-e	1-f	1-g	1-h	2
Agree	389	385	433	442	398	471	417	393	400
Disagree	394	390	282	297	341	182	209	164	344
Neither	37	42	95	75	67	156	177	230	36

(b) Summary of comments on each question

Question 1(a) Proposed maximum trading hours for on-licensed premises in the Central City

Submitters were asked to indicate their level of satisfaction with this provision:



Comments

There were 368 comments on this question. The table shows the number of comments by the answer to the question.

Agree ticked	Disagree ticked	Neither/nor ticked	Comment only
30	325	4	9

Agree

These submitters generally thought the proposed hours were a good idea from safety and behavioural perspectives. A number of submitters felt 3am was still too late and would prefer earlier closing.

Disagree

Some of these submitters wanted earlier closing hours such as midnight or 1am everywhere. Some felt that 8am was too early for bars to open and that 10am should be the earliest.

Many submitters felt that a 1am one-way door and 3am closing were much too early. Some felt the closing time should be consistent with the Sale and Supply of Alcohol Act default hour of 4am. Others wanted 5am or later, especially for night-clubs: the proposed hours would be detrimental to Christchurch’s live music scene as national and international acts would not be interested in coming to a place that closed so early.

Many submitters said that the trading hours would ruin Christchurch’s night life, would be detrimental to the city’s recovery, would drive students and young people generally out of the city to other, less restrictive cities, and would discourage new business and tourists and be damaging to the economy. There should be freedom of choice by bar owners as to their trading hours, and people should be able to choose for themselves what hours they socialise at.

Many submitters said the shorter hours would increase preloading, would be ineffective in stopping abuse, would create havoc as large numbers of (possibly unhappy or angry) people all descend on the streets at the same time and would drive young people into unsafe, unregulated drinking places such as house parties or parks.

Some submitters noted that Central Area A was too small and it should be extended to include the whole area within the Four Avenues.

A number of submitters noted that the policy was discriminatory against shift workers unable to go to a bar after late work, and discriminatory between bars that were within or outside Central Area A -

particularly bars that have managed to relocate after the quakes to areas that are now in Central Area B.

Neither (i.e. made a comment and answered Neither Agreed nor Disagreed)

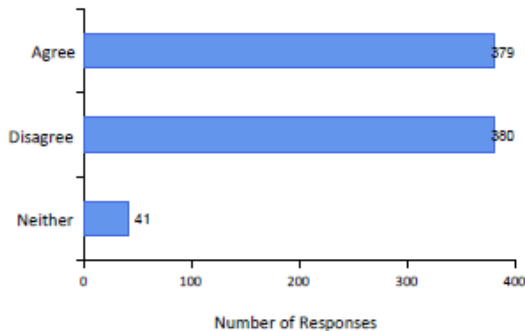
Only one submitter responded in this way: they said 4 or 5am would be better in order to keep some young people entertained and avoid partying at home and causing neighbourhood disruption.

Comment only (i.e. made a comment but did not mark one of the tick box options)

These submitters said the hours would kill social life in Christchurch, the city needs to attract tourists, new business and residents and this policy would reduce spending and harm the economy. Later hours means more people on the streets, which makes them safer places.

Question 1(b) Proposed maximum trading hours for on-licensed premises in other parts of the city

Submitters were asked to indicate their level of satisfaction with this provision:



Comments

There were 351 comments on this question. The table shows the number of comments by the answer to the question.

Agree ticked	Disagree ticked	Neither/nor ticked	Comment only
30	310	3	8

Agree

Most of these submitters said they agreed because of noise and safety in residential areas, with many referring to Victoria Street in particular. Some submitters said they thought closing should be earlier.

Disagree

Many of these submitters made the same comments as were made for question 1(a).

Many submitters commented that the policy would punish bars and clubs that relocated out of the Central City while it was closed and are out of Central Area A. Examples given were Baretta, located on the south side of St Asaph Street, and the Revival Bar on Victoria Street. A number of submitters commented that the 1am restriction was too limiting for a number of areas: Victoria Street, Lyttelton, Akaroa, Riccarton, the St Asaph Street – Moorhouse Avenue quadrant and The Palms.

Many submitters said the hours would be detrimental to Christchurch's live music scene as national and international acts would not be interested in coming to a place that closed so early.

Many submitters said that the trading hours would ruin Christchurch's nightlife, would be detrimental to the city's recovery, would drive students and young people generally out of the city to other, less restrictive cities, and would discourage new business, especially those trying to fill the void caused by the closing of Central City bars and clubs, tourists and be damaging to the economy.

Many submitters said the shorter hours would increase preloading, would be ineffective in stopping abuse, would create havoc as large numbers of (possibly unhappy or angry) people all descend on the streets at the same time and would drive young people into unsafe, unregulated drinking places such as house parties or parks.

Neither

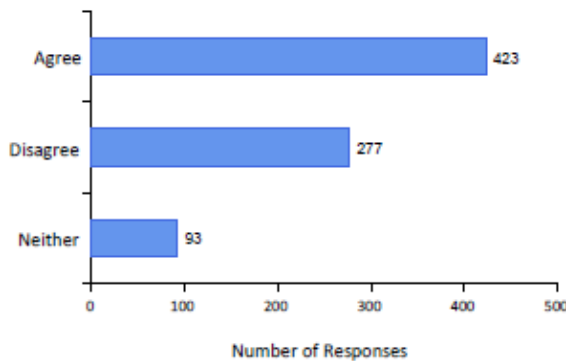
One of these submitters said theoretically they would approve of this but considered it was unreasonable that some places such as Volstead had to close at 11pm whereas other bars such as the Fox & Ferret had significantly later closing times. The other submitters said there should be discretion if the premises have houses around them.

Comment only

One submitter said that giving the Central Area A later hours would stop further development in other neighbourhoods such as Victoria St, Merivale, Lyttelton, or Beckenham.

Question 1(c) Proposed maximum trading hours for on-licensed premises such as restaurants and cafes in all parts of the city

Submitters were asked to indicate their level of satisfaction with this provision:



Comments

There were 220 comments on this question. The table shows the number of comments by the answer to the question.

Agree ticked	Disagree ticked	Neither/nor ticked	Comment only
26	187	2	5

Agree

Submitters considered that these hours are reasonable and encouraged food to be eaten with alcohol. Many considered that most restaurants and cafes generally close earlier than 1am unless they are attached to a bar or night-club and do not cause noise and control problems, unless they become bars later in the evening. A few thought the closing time should be earlier, such as midnight.

Disagree

Most of these submitters felt that these hours were too restrictive, would stifle the economy and take away freedom of choice. They favoured later closing times and earlier opening times, citing business or champagne breakfasts. Many considered having early closing times would not contribute to a vibrant city, would deter young people from coming here, and would deter business investment.

Many people commented that these hours would encourage preloading, drunk driving, drinking in uncontrolled environments such as house parties, and that having a lot of people exiting premises at the same time was a recipe for disaster.

Many people considered there should be few if any restrictions; that businesses should be able to set their own hours and that as restaurants and cafes provide food, entertainment and socialising in a controlled environment it is preferable that people stay within them if they are having an enjoyable time rather than having to leave. Others commented that the hours would restrict nightlife and the live music scene. Some said that inner city businesses were being favoured at the expense of businesses elsewhere – all should be treated the same.

Neither

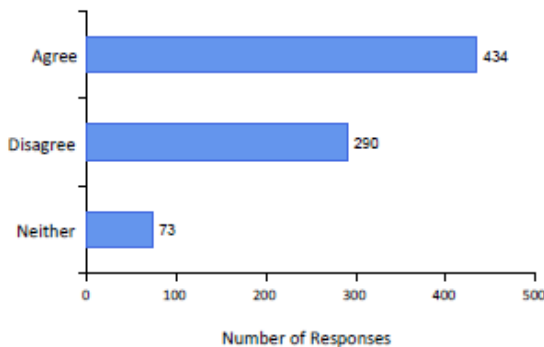
One submitter said Lyttelton needs a place for people to go later in the evening. They said the Wunderbar was regarded as a night-club, late night bar. They considered 1am is too early to close – better to have people inside rather than having them on the streets.

Comment only

One submitter thought the hours were reasonable. One submitter said that giving the Central Area A later hours would stop further development in other neighbourhoods such as Victoria St, Merivale, Lyttelton, or Beckenham. Two submitters said the policy was placing restrictions on the nightlife of the majority of citizens, for the few who abuse their rights. The remaining submitter just disagreed.

Question 1(d) Proposed maximum trading hours for off-licensed premises in all parts of the city

Submitters were asked to indicate their level of satisfaction with this provision:



Comments

There were 282 comments on this question. The table shows the number of comments by the answer to the question.

Agree ticked	Disagree ticked	Neither/nor ticked	Comment only
38	224	12	8

Agree

Many of these submitters said that the proposed hours would reduce the availability of alcohol and reduce preloading. Some said all off-licenses should be treated the same with no exemptions for supermarkets. Some submitters said that alcohol should not be sold by supermarkets, grocery or convenience stores. A number thought that 9pm was too late for closing and favoured 7pm instead.

Disagree

Those who felt the hours were too restrictive

Many of these submitters noted that reducing the maximum trading hours for both supermarkets and bottle stores would significantly adversely affect shift workers, people who regularly work until 9pm or later, and university students who frequently work late. Many submitters noted that this proposal would significantly adversely affect those people who like to shop early when supermarkets open (often 7am or 8am) and those who like to shop late (after 9pm), as they would be unable to purchase wine or beer with their main shop. Some of these submitters said supermarkets should be able sell alcohol any time they were open.

Many submitters suggested later trading hours – 10pm, 11pm, midnight or 24 hours seven days a week. The majority of these submitters favoured 11pm closing for all off-licences.

A number of submitters considered the proposal took away their freedom to choose when to purchase alcohol and punished the responsible majority for the irresponsible actions of a minority. They also said that it should be up to individual businesses to determine their opening and closing hours.

Many submitters said that the proposal would not reduce peoples' drinking, rather they said people will just stock up by buying more at each purchase.

Those who felt the hours were not restrictive enough

A number of submitters said the hours should more restrictive than in the proposal but did not suggest what they should be. However some submitters suggested a variety of trading hours – from opening at 10am, 11am or 12 noon, and ceasing the sale of alcohol in supermarkets from 7pm and closing hours for bottle stores at 5pm, 6pm or 7pm. A few submitters said alcohol should not be sold on Sundays.

A number of submitters said they thought that supermarkets and grocery stores should not sell alcohol at all.

Neither

One of these submitters said supermarkets should have their display/floor space allocated to alcohol severely limited and one said supermarkets should not be able to sell alcohol.

Five submitters said closing hours should be later and suggested 10pm or 11pm so people who work late or who have had a late change of plans are not penalised.

One submitter said the proposal would unfairly penalise the responsible majority by closing a supermarket because of a minority group.

Wines of Canterbury said many wineries who had cellar door off-licences are also operating as mail order outlets, and for many wineries this constitutes a great deal of their income (more so than cellar door sales). Reducing the hours of the off-licence to 9am to 9pm could have a detrimental economic effect on this side of the cellar door operation.

One submitter said it would not make much difference to sales as people would just purchase earlier. They said the Council should be encouraging people into restaurants, bars and hotels.

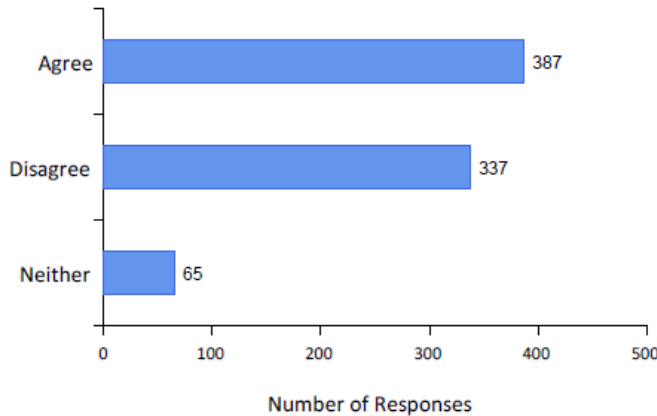
The remaining submitters in this group said they approved of the proposal.

Comment only

One of these submitters agreed with this question. One submitter said the hours were too restrictive as most people do not abuse their rights and access to alcohol. One submitter commented that it doesn't matter what the hours are as people will still buy alcohol. One person commented on shift workers who work late and might want to buy something to take home. Two submitters suggested hours should be 8am to 11 pm and two just disagreed.

Question 1(e) Proposed one-way door restriction in the Central City

Submitters were asked to indicate their level of satisfaction with this provision:



Comments

There were 286 comments on this question. The table shows the number of comments by the answer to the question.

Agree ticked	Disagree ticked	Neither/nor ticked	Comment only
23	235	11	17

Agree

All these submitters said the one-way door was a very good idea. Reasons included it would make for a safer less violent city; violence and bad behaviours seem to happen later in the evening and between establishments; it would make people plan their nights, and would keep drunks off the streets; and it supports a wider, more restrictive policy.

Three submitters suggested times of 2am or 3am.

Disagree

Those who felt the one-way door was too restrictive

Many of these submitters disagreed with having a one-way door at all and considered there should be no restrictions. Many submitters said they agreed with a one-way door but thought that 1am was too early. A number of these submitters suggested 2am or 3am would be preferable. Some thought closing times for all bars should be 4am or 5am.

Many submitters said it would make the city very unsafe as people would move from areas where bars closed at 1am to the Central Area A to try and get in to a bar before 1am. They said this would make for queues outside those bars and those in the queue who did not manage to get in would be angry and cause trouble and violence on the streets. Many submitters commented that this could mean people could be separated from their friends if they did not get in before 1am and be in unsafe situations. This could also happen if people needed to go outside after 1am and then would not be allowed back in.

A number of submitters considered the proposal took away their freedom to choose where to spend their nights and punished the responsible majority for the irresponsible actions of a minority. They also said that it should be up to individual businesses to determine their opening and closing hours and whether they had a one-way door or not.

Many of these submitters noted that a one-way door at 1am would significantly adversely affect shift workers, people who regularly work late, university students who frequently work late and tourists. They also said it would hamper the recovery as there would be no incentive for entrepreneurs to open new bars and the new bars that have opened since the earthquake would be penalised.

Many submitters commented that many young people do not head out for a night's entertainment until 11pm or midnight so this would disadvantage them. Many suggested that instead of going into town, people would have parties at home which could be undesirable for neighbours and mean people are

drinking in uncontrolled environments. Many also said that this proposal would increase the amount of preloading.

Those who felt the one-way door was not restrictive enough

These submitters agreed with the one-way door but said 1am was too late and suggested times of 11pm or midnight.

Neither

Most of these submitters agreed with the proposal but said 1am was too early, would discourage night time music and culture, and would mean people could not get into bars because of the queues. Some suggested 2am or 3am would be more reasonable.

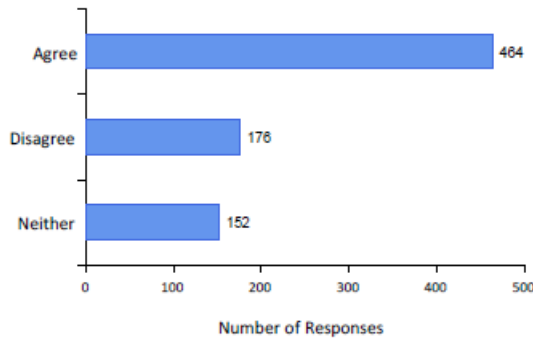
Comment only

All these submitters disagreed with the 1am one-way door proposal. The reasons they gave included having to decide by 12.30pm where to spend the rest of the night, which takes away the relaxed atmosphere; problems will occur when people spill out of city bars that close at 1am and head towards Central Area A; responsible bar owners and managers have other options to manage their customers such as stamps and membership cards; adults have the right to decide when to come and go from premises; and such a policy would send youth away from Christchurch.

One submitter suggested a 2am one-way door and another suggested 3am.

Question 1(f) Proposed controls on the location of new bottle stores

Submitters were asked to indicate their level of satisfaction with this provision:



Comments

There were 158 comments on this question. The table shows the number of comments by the answer to the question.

Agree ticked	Disagree ticked	Neither/nor ticked	Comment only
30	110	15	3

Agree

All these submitters said there were plenty of bottle stores already and more were not needed. Some submitters said that a check should be kept on density, especially in lower socioeconomic areas and near schools, and there were too many in residential areas.

Disagree

Those who felt the proposed controls on the location of bottle stores were too restrictive
 Many of these submitters said that bottle stores should be treated like any other business, able to set up wherever they chose, subject to current regulations. Some submitters said such restrictions would discourage business growth, limit economic growth, and drive young people out of Christchurch. Some submitters said it would be detrimental to the rebuild and to Christchurch nightlife; others said it was too restrictive and reduced their freedom to choose. Some submitters said each new licence application should be considered on a case-by-case basis, rather than having blanket controls. Some submitters said the proposal would inconvenience people not living in or near the proposed areas; others said the proposed controls would be ineffective as supermarkets stock alcohol.

Those who felt the proposed controls on the location of bottle stores were not restrictive enough
 Many of these submitters said there were too many bottle stores already and the proposed controls did not go far enough. Some submitters said that density should be addressed and there should be no bottle stores in residential areas or within given distances from schools or churches. Submitters suggested 0.5km and 3km. Some submitters said the views of schools and communities should be taken into account when issuing licences and cited Henry's in Yaldhurst Road and the proposed Henry's in St Martins.

Wines of Canterbury said there is no separate definition for winery off-licences (cellar doors) and thus these are categorised with taverns and bottle stores. Since there is no mention of rural zones they said this could adversely affect new vineyards trying to set up a cellar door operation on their sites. They advocate the LAP should differentiate between types of off-licensee according to the level of risk, cost and social and economic benefits attributable to licensees of that type.

Neither

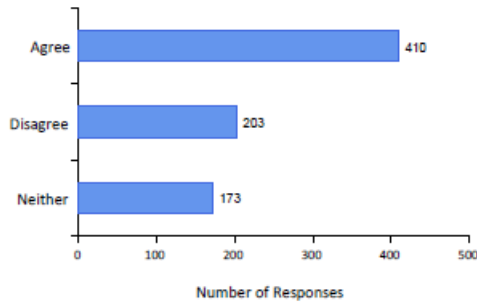
Some of these submitters said that the same controls should apply to supermarkets and dairies; and consideration should be given to proximity to schools and address density of premises.

Comment only

Two submitters agreed with the proposal and said bottle stores should not be near schools. The other submitter said fewer social outlets means further distances between them, so people are more likely to risk driving with excess breath alcohol.

Question 1(g) Proposed controls on the location of new taverns

Submitters were asked to indicate their level of satisfaction with this provision:



Comments

There were 159 comments on this question. The table shows the number of comments by the answer to the question.

Agree ticked	Disagree ticked	Neither/nor ticked	Comment only
20	119	13	7

Agree

Most of these submitters made the same comments about taverns as they did about bottle stores. Some submitters said that a check should be kept on density, especially in lower socioeconomic areas, and there were too many in residential areas.

Disagree

Many of these submitters reiterated the comments they made about the proposed controls on the location of bottle stores

Those who felt the proposed controls on the location of taverns were too restrictive

Many of these submitters said that taverns should be treated like any other business, able to set up wherever they chose, subject to current regulations and market forces. Some submitters said such restrictions would discourage business growth, limit economic growth, and drive young people out of Christchurch. Some submitters said it would be detrimental to the rebuild and to Christchurch nightlife. A number of submitters said the proposal was far too restrictive and reduced their freedom to choose.

Some submitters said each new licence application should be considered on a case-by-case basis, rather than having blanket controls.

Some submitters said the proposal would inconvenience people not living in or near the proposed areas, while others said that taverns should be in neighbourhoods as they act as a gathering place for people to meet and socialise and if they are close by it means people are less likely to be driving after drinking.

Those who felt the proposed controls on the location of taverns were not restrictive enough

Many of these submitters said there were too many taverns already and the proposed controls did not go far enough. Some submitters said that density should be addressed and there should be no taverns within given distances from schools or churches. Submitters suggested 0.5km and 3km. Some submitters said the views of communities should be taken into account when issuing licences.

Wines of Canterbury said there is no separate definition for winery off-licences (cellar doors) and thus these are categorised with taverns and bottle stores. Since there is no mention of rural zones they said this could adversely affect new vineyards trying to set up a cellar door operation on their sites. They advocate the LAP should differentiate between types of off-licensee according to the level of risk, cost and social and economic benefits attributable to licensees of that type.

Neither

One submitter said the demand for bars vastly exceeds the supply and adding local bars to areas which are acting in place of the city centre would be of benefit to the city.

Some said consideration should be given to proximity to schools, and address density of premises. One submitter said noise restrictions should be enforced and one said each licence application should be on a case-by-case basis.

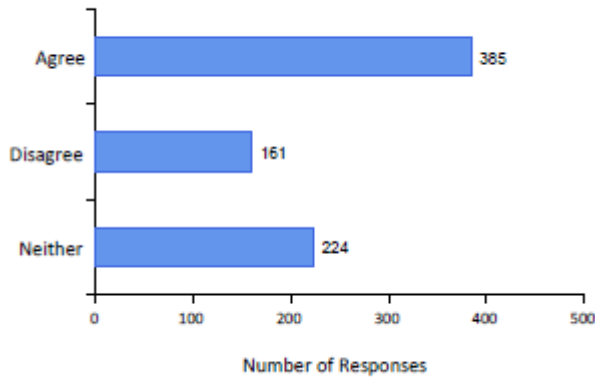
One submitter said research should be done to find out the effects a tavern would have on the area.

Comment only

Most of these submitters said the proposed control were overly restrictive, would stifle new business and taverns should be allowed in suburbs to be the local pub.

One submitter said no new licences should be issued and one said there should be limits on the total number of taverns in an area.

Question 1(h) Proposed special licence and discretionary conditions



Comments

There were 122 comments on this question. The table shows the number of comments by the answer to the question.

Agree ticked	Disagree ticked	Neither/nor ticked	Comment only
18	86	13	5

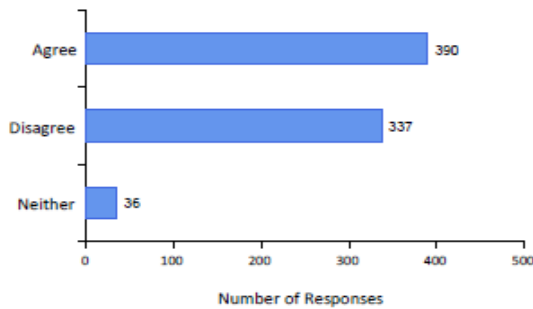
There was a comparatively small number of comments on this section of the draft LAP. 70 per cent of comments were critical. The most frequent comments related to the following:

- The discretionary conditions are too restrictive, unnecessary and place too great a cost and onus on the premise owner. For example, providing additional security staff late at night should be made at the bar or club owner’s discretion – they understand their business needs.
- The restricted trading hours placed on first time licensees will inhibit their ability to establish a reasonable market share and would deter new entrepreneurs from setting up business at all. A three-month trial period instead was suggested.
- Discretionary conditions should include restrictions on signage relating to special prices and offers such as ‘happy hours’.
- The Accident Compensation Corporation (ACC) recommended that discretionary conditions include a requirement for training for staff across all licence types.

Comments on special licences’ provisions focused on:

- The proposed limit on special license applications per year would inhibit the live music/entertainment scene: it would mean that entrepreneurs could not get enough special licences to serve all their gigs and events. This would diminish their business opportunities and profitability.
- The limited number of venues (especially post-earthquake) available for such events would further exacerbate this – a smaller number of venues are running a greater number of events. Similarly, clubs and suburban hotels would be disadvantaged – they are helping to fill a large gap in need for community-style venues and should not be thwarted by limits on special licence applications.
- The limits on special licences will do nothing to reduce alcohol-related harm.

Question 2 Overall support for the draft policy's direction



There were no comments on this question. It was a simple Agree/Disagree/Neither option.

Question 3 Best aspects of the draft LAP

Of the over 600 responses to this question, most identified one or more of the following four provisions as the best part(s) of the draft policy:

- Restrictions on off-licences' trading hours for selling alcohol.
- One-way door restriction in Central Area A.
- Restrictions on location of new bottle stores and taverns.
- Distinction between on-licence trading hours in Central Area A and those in suburban/residential areas, including Victoria St.

A small number of submitters noted that the draft policy is 'a step in the right direction', commended the Council for tackling a serious issue of importance to the whole community, considered that the restrictions will help curb alcohol-related disorder, accidents and harm, and thought that the provisions will reduce preloading and binge drinking habits.

Conversely, a similar number of submitters answering this question found nothing commendable in the draft LAP: the most common criticisms being that it will stifle the city's nightlife; deter young people from living and coming to the city; will be ineffective in reducing alcohol-related harm; is a symptom of a 'nanny state' and has been developed by those who are out of touch.

Over 200 of the comments on this question identified the proposed trading hours for on and off-licensed premises as one of, or the single, best aspect of the draft policy. About 70 submitters referred specifically to the proposed restrictions on on-licensed hours. Of those who commented specifically on off-licensed premises' hours of trading of alcohol, about 80 submitters referred specifically to bottle stores and 20 to supermarkets, but the rest referred generically to off-licensed premises. Almost all such comments in favour of the restricted trading hours referred to the maximum hours for closing of off-licensed sales of alcohol (9pm); hardly any comments were made about opening hours (the proposed 9am).

About 80 responses to this question identified the proposed one-way door restriction in the Central Area A as the best, or one of the better, aspects of the draft policy: they thought it was a reasonable restriction that will help reduce disorder and negative behaviour later at night in the Central City.

Controlling location of new bottle stores and taverns to business-zoned areas was noted by over 30 submitters as one of the best parts of the draft policy. Specific mention was made by some supporting the restriction of bottle stores to business-zoned land, with only a few specifically mentioning taverns. Generally comments said that there are adequate (some said too many) bottle stores in suburban areas and the proposed policy is sensible.

The difference in maximum trading hours between the Central City and elsewhere was noted by a number of submitters. Later closing in a defined part of the Central City was supported and the earlier 1am closing time elsewhere was thought appropriate for residential and suburban areas. The proposed inclusion of Victoria Street in the Central Area B (maximum 1am closing for on-licensed premises) was specifically supported by about 25 submitters.

Question 4 Aspects of the draft policy that need to be changed

Nearly 800 Have Your Say submitters answered this question. Almost 15 per cent would like no changes to the policy, while others suggested specific areas of the policy that could be improved. The most common areas noted for improvement were:

- Fewer restrictions for on-licensed venues in the Central City and in some suburban areas, including a less restrictive, or removal of, the one-way door policy.
- More restrictions for off-licensed premises.

Closing times

- The proposed Central City Area A is too small and closes too early. Some bars or night-clubs within this area should be open later as a staggered closing will reduce crowd dispersal problems. Other areas within the CBD, Frame and Central City area should be included as the proposed size is about one per cent of the previous area that was deemed CBD.
- Those areas that have developed since the earthquakes should be included in the later trading area.
- A closing time of 5am to be in line with Auckland and Wellington could be considered,
- Hours need to be later so that young people do not leave the city or have house parties and cause trouble in the suburbs. It is better that people drink in supervised areas late at night rather than in uncontrolled environments. The hours need to change to avoid becoming a retirement village and a place tourists don't visit.
- Reduced hours will inhibit development and deter investment.
- People need to be encouraged to return to the Central City, not turned away from it.
- Hours should be at the discretion of the licence holder.
- Host responsibility needs to be a focus. Those who are not responsible hosts should have severe penalties or reduced trading.
- Hours are too restrictive for those that work night shifts or in the hospitality industry.
- The limit on special licences is too restrictive and will hurt non-tavern licensed venues that hold social functions.
- Dance and music events will be affected by the proposed closing hours.
- Areas suggested for later opening were Lyttelton, Akaroa, Victoria Street, the Frame, and the area within the Four Avenues if residents consider it is in their best interest. Others would like to see exceptions for all or some suburban areas or particular taverns so that there is not an environment that destroys competition and favours the few Central City bars over the many suburban bars. Suburban hours could be extended on a case-by-case basis.
- However comments in support of the restrictions (or wanted more) said that the hospitality industry avoids the social costs of alcohol and that 3am is too late for bars to be open. Some suggested no alcohol sales past 2am while others said midnight or 1am is a more suitable closing time.
- Others supported the proposed closing time for suburban areas and a few would like to see these closing times further reduced in residential areas, and delayed opening of suburban taverns. Others said no changes should be made to extend suburban hours.

One-way door

- The majority of comments on the 1am one-way door restrictions in the Central City would like to see it implemented later or to remove them completely. Some said that it should be discretionary. Some said they need to be removed as it takes too long to get into bars and it is unreasonable for people to want to stay in one bar for two hours. They said it will not encourage tourism, Central City development and will not reduce alcohol-related harm.
- The few people that did support one-way door policies suggested their inclusion in suburban areas as well. Others would like to see tougher one-way door restrictions that start earlier in the Central City.

Hours for off-licences

Most submitters here wanted more restrictions on hours and locations of off-licensed premises.

- Off-licences contribute to preloading and alcohol-related problems so reduced hours are acceptable. Reduced hours will limit harm to vulnerable people.
- Shorter trading hours both in the morning and the evening were suggested. A few people suggested no trade on Sundays for off-licensed premises.

- Some said that there are too many outlets in suburbs and that more needs to be done than just reducing hours. Some said that the number of new off-licence outlets needs to be limited further. They said that harm is caused in alcohol outlet-dense areas of the city and that the growth of outlets in these areas needs to be reduced. Density and proximity are important considerations and distance restrictions could be included.
- Some wanted grocery stores or dairies stopped from selling alcohol, while others said supermarkets should not sell alcohol as it normalises it. Other suggestions include R18 sections or entirely separate sections where alcohol is sold.
- Some said liquor stores and supermarkets should not be on the same site.

But there were also contrary comments:

- Supermarkets and bottle stores should have different rules as supermarket hours will be impeded if they are unable to sell beer and wine.
- Supermarkets should have longer hours so people can purchase alcohol when they do grocery shopping. Some said hours of trade of alcohol should match store opening hours.
- A few submitters thought that no changes are required to off-licensed premises in the city and that hours should be extended or left as they are currently.

Other comments

- The focus should be on education. The policy is treating the symptoms rather than the cause. Social changes rather than timing changes are needed. It is the consumers that cause the problems, not the businesses.
- The recommendations are not best practice and do not have any evidence to show effectiveness. There are fundamental flaws with the proposed policy.
- There could be more input on licensing decisions from local communities, those living in the area, the hospitality industry and those who work in the hospitality industry. An accord may be another solution.
- Need to get rid of all loopholes in the policy.
- Need to explore the economic impacts of the clauses.
- Try the policy and then assess it after a trial. Assess regularly and change it if it is not working.
- Local business resistance will be based on self interest not benefit to the community.
- Eventually the LAP should be more restrictive, but this is not achievable yet so this is a good start.

Other changes suggested:

- Ban party buses, use ID scanning and retinal scanning, put restrictions on advertising and marketing, promote low alcohol drinks, no tax for low alcohol drinks, forbid drinking in public, Police to take a stronger stance on intoxication and repeat offences, make public drunkenness an offence, increase purchasing age, have minimum prices per standard drink, link taxation to alcohol treatment, restrict the quantity, size or strength of alcohol available after a certain time, have greater controls on price, RTD and alco-pop sales, make on-licences charge more after midnight and use that revenue to pay for problems caused.

Question 5 Other comments about the content or further matters to be considered

Over 600 Have Your Say submitters answered this question. Two thirds used it as an opportunity to emphasise points already made in their submission – about 45 per cent stated their opposition to the draft policy's provisions (particularly on-licensed premises' trading hours) and about 20 per cent commended or affirmed their support for the draft. The remaining one third, whilst broadly supportive, contributed a wide range of comments on additional or alternative ideas for policy provisions and future work that would strengthen ways to reduce alcohol-related harm.

Of the 45 per cent who noted their opposition to the draft policy, the most common criticisms were:

- The proposed on-licences' trading hours in the Central City (in particular) and one-way door restriction will drive young people from the city and turn it into an unattractive 'retirement village'.
- The provisions are ham-fisted and penalise the whole hospitality sector for the sake of curbing the behaviour of a minority and drinking behaviours for which they are not responsible (preloading and binge drinking fuelled by cheaper off-licence purchasing).
- The provisions will have unintended consequences such as dumping dissatisfied drinkers en masse onto the streets earlier.
- The policy will encourage more, comparatively uncontrolled, drinking at home.
- The proposed 1am one-way door in Central Area A will drain suburban premises' business by pushing drinkers into travelling into the Central City before the 1am close-off.

From the 20 per cent who affirmed the policy's direction and provisions, the most common comment was that it is a commendable first step in addressing alcohol-related harm and will contribute to reducing binge drinking, preloading and alcohol-related harm.

From the 35 per cent of submitters who made comments on further steps the Council and others should take to reduce alcohol-related harm, there was a wide range of matters raised – both inside and some outside the scope of a LAP. These included:

- Placing more emphasis on personal responsibility for managing drinking behaviour.
- Requiring greater host responsibility measures (such as installation of CCTV, late night security staff, staff training programmes).
- Increasing enforcement of existing laws such as liquor bans, noise controls, underage drinkers.

About 20 submitters made comments about the location of new off-licensed premises within close proximity to schools (500m, 1 km and 2km were suggested). Two thirds of these comments specified that bottle stores should not be allowed within a close radius and the other third referred generically to off-licensed premises.

More than 20 submitters requested that limits on the density of off-licensed premises be considered – specific areas mentioned were Ilam, Riccarton and those with lower socioeconomic demography. Mostly these references were to bottle stores.

Alternative policy proposals included:

- A 2am one-way door instead of 1am – more moderate and aligned with the pre-earthquake status quo.
- Later closing time (e.g. 5am) for some on-licensed premises in the Central City, to enable a lively late night entertainment scene to survive, and attract young people.
- Later closing times on Thursday, Friday and Saturday nights for suburban bars and those in townships such as Akaroa and Lyttelton.
- Maximum of 10pm closing for off-licensed sales of alcohol, to accommodate lifestyle shopping patterns, and longer working hours (the shift worker population has grown in number post-earthquakes).
- A small number of submitters suggested that the policy provisions should be more restrictive such as reducing off-licences' trading hours further to 6pm or 7pm, and not on Sundays.

A few submitters (fewer than 10) called for policy actions beyond the scope of a LAP:

- Being intoxicated in a public place should be an offence.
- Product advertising should be banned from the exterior of off-licensed premises.
- There should be greater opportunity and time for local communities and individuals to have input into specific licensing decisions being considered by the District Licensing Committee.
- There should be education programmes that encourage safer drinking habits.

Density

Several comments were made on the density of licensed premises and that more should be done to consider density in the draft LAP.

A number cited *Alcohol in our Lives: Curbing the Harm (2010)* and the link between density and alcohol consumption, harms and community degradation.

Other reasons given for the need to consider density were:

- To avoid bottle store density in poorer areas.
- There are proven harms linked to density.
- Density is currently neglected and not enough is done to control it.
- Off-licences are clustered in areas with higher deprivation.
- Bottle stores and taverns are limited to areas of the city, but the number of licences in each area is not limited.
- Density could cause competition on price.

Measures given to help to manage density were:

- A cap on the number of outlets.
- Reduced growth of outlets.
- Restriction dependent on population.
- Regulations to permit a view of the wider community at hearings about the number and density of outlets.
- Restrict the number of licences.
- Refuse a licence if there are sufficient outlets in the areas.
- No off-licences given within a 500m radius of each other.

Submitters commented both on the need for density to be included in the draft LAP for both off- and on-licensed premises. The majority refer to off-licensed premises.

Night-clubs

The need for specific provision for late night night-clubs, for entertainment, live music performance, DJs and dancing was emphasised by a large number of submitters, especially in the two Facebook-based submission forms.

Reasons given for this later trading licence include:

- Musicians and DJs depend on late night venues to allow them to play. They attract international talent to the city.
- Some night-clubs have a door charge and provide quality entertainment. Night-clubs with a door charge should allow people to come and go as they please.
- Having two or three special licensed venues open later will keep the city alive.
- Night-clubs provide entertainment and are venues for music, dancing, concerts and DJs. They are places where people meet and socialise. Entertainment other than alcohol is provided.
- People attending night-clubs and dance music stay to late hours with minimal trouble. Those listening to electronic music and dancing are not the types to be getting into trouble and committing harm.
- Night-clubs are quite different from taverns. Night-clubs do not trade in the day and are well managed. They provide facilities dedicated for entertainment, have door charges and open later.
- Submitters suggested the reintroduction of 'entertainment licences' on a case-by-case basis.

Other matters – outside of the LAP

The introduction to the Statement of Proposal invited submissions on precinct-based accords. Although these are out of the scope of a LAP they may be appropriate for consideration as part of an alcohol strategy. There was a range of positive comments about the appeal of precincts and the opportunity they provide for diverse, enriching hospitality and entertainment activities. A summary of views on these is below.

Precincts

Precincts, or identified areas where late night or a particular type of hospitality/entertainment activity can be carried out in an identifiable and cohesive way, were specifically commented on by almost 10 per cent of submitters, including many licensees and providers of late night entertainment. Submitters using the Hospitality New Zealand and Save Chch Nightlife's process were particularly supportive of providing areas where late night entertainment, night-clubs and music gigs could thrive. Many spoke of the great reputation the Christchurch live music scene once had and how that was threatened by the proposed 3am maximum closing time in Central Area A and 1am closing elsewhere (the latter being where suitable, affordable premises or land is more likely located to cater for late night entertainment venues).

Noted advantages of hospitality or entertainment-focused precincts were that they would:

- Enable purpose-designed amenity e.g. crime prevention and crowd management techniques.
- Foster collaborative licensees' initiatives to manage patron behaviour through, for example, sector accords, initiatives such as ID-scanning, CCTV.
- Allow attractive growth of clusters of activity in appropriate areas that can reflect diverse types of hospitality.
- Help address shortfall of space for late night entertainment and hospitality – Central Area A is considered far too small.
- Create suitable space for late night night-clubs and music venues to operate – the need for an area/areas where night clubs and live music gigs can happen is urgently needed.

Areas suitable for development into precincts included St Asaph Street, Riccarton Road, Addington, Merivale and the Palms.. Victoria Street was noted by a number of submitters (both licensees and users of the area) as a successful precinct, albeit issues relating to its adjacency to residential living were strongly noted in representative and individual submissions from nearby residents.

Later trading hours, aligned with Central Area A, were seen as a crucial point of difference essential for precincts in suburban areas such as Merivale, Riccarton, Addington and Victoria Street (LAP2900, LAP2897, LAP2840). Licensees from the likes of SOL Square and Victoria Street commented on the popularity of their existing and prior precincts to patrons, and their significant contribution to the Central City's vitality. Though not recommending precinct development, other submissions advocated for later trading hours for premises in suburban areas such as Lyttelton and Hornby. Such areas are seen to be important centres or hubs for local socialising and later hours are a sensible way to provide residents with accessible, neighbourhood social venues without the need for late night cross-town travel.

Accords

The effectiveness of local, sector Accords between licensees was supported by 19 premises in two submissions (two of the licensees had two premises each in the area they wrote about). They were seen as an effective tool for developing positive collaboration between premises in a local area and a means of working together to pro-actively manage patron behaviour both inside, outside and nearby to premises. Numerous examples of collaborative initiatives achieved and planned are detailed in the Victoria Street Precinct Accord Group's submission (LAP2897).

The Victoria Street Precinct Accord Group recommended that its active precinct accord be formally recognised in the LAP and regard be given to it in licensing decisions. Similarly, the collective of Addington/Riccarton-licensees (LAP2840) submitted that an Accord be developed in their area and it be also recognised in the LAP and regard be given to it in resource consent and licensing decisions.

The effectiveness of such accords was, however, challenged by others such as the Victoria Neighbourhood Association (LAP2627).

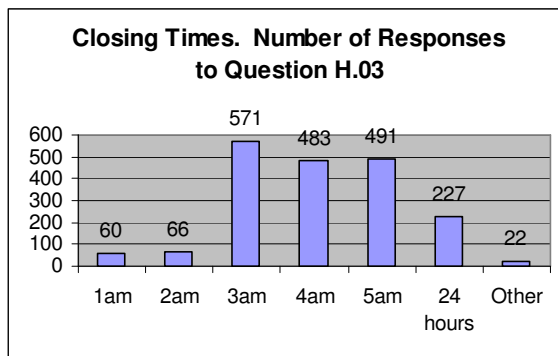
8.2. Hospitality New Zealand Facebook submissions' summary

Hospitality New Zealand hosted a Facebook-based survey and submission process. They asked different questions from those posed in the Have Your Say submission form. The responses to the Hospitality questions are shown graphically below, along with a summary of additional comments that were made. Hospitality New Zealand provides its own analysis of the survey results in its own organisational submission too (LAP2515). The Facebook-based submissions run from LAP500-LAP2428.

The graphs below show the answers given by submitters to questions regarding off- and on-licences' closing hours.

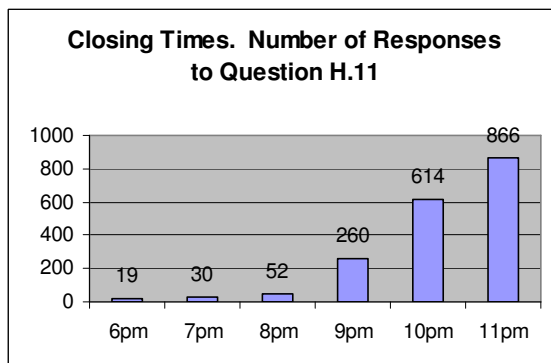
Graph 2

H.03 What do you consider is an appropriate closing time for the Central Christchurch hospitality area (being the main area of licensed premises in the whole of Christchurch)?



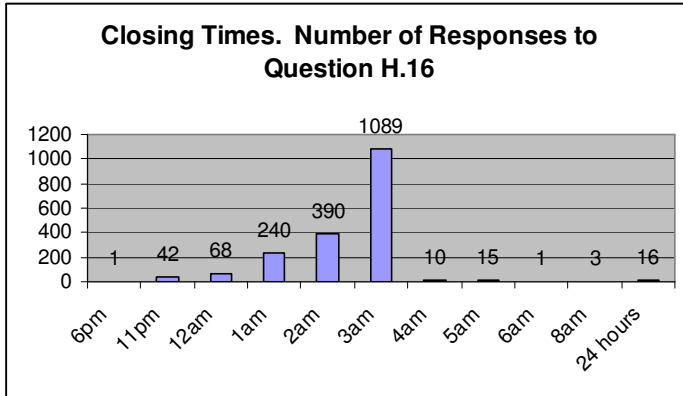
Graph 3

H.11 What do you consider is an appropriate closing time for off-licence sales?



Graph 4

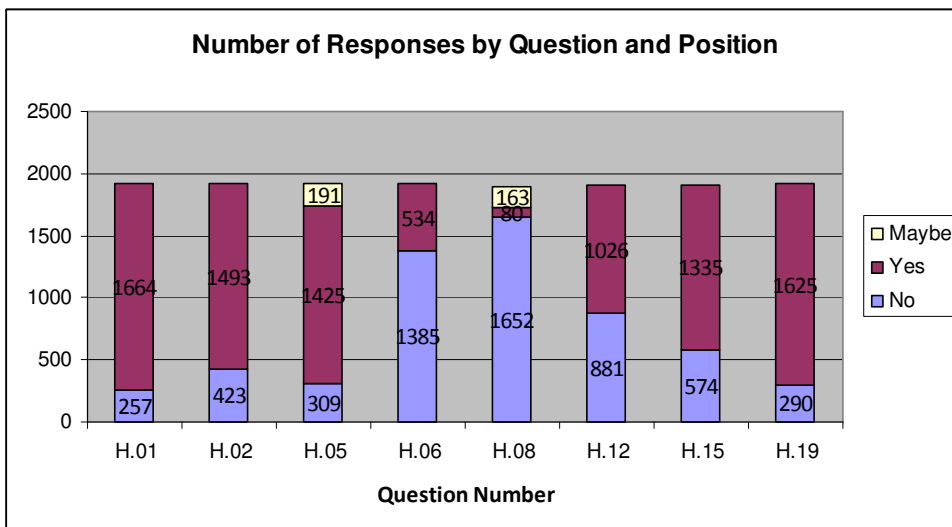
H.16 With regard to Riccarton, Merivale, Shirley, etc: What do you consider is an appropriate closing time for these areas?



Graph 5 below shows the answers given by submitters to the following questions:

- H.01 Do you consider that the late night bar/restaurant/night-club area should be enlarged to include all Central City Zoned land within the Four Avenues?
- H.02 Do you think other areas around Christchurch should also have later trading?
- H.05 Would the proposed one-way door have negative impacts on your habits of going out in Christchurch?
- H.06 Would a one-way door and reduced trading hours make you go out earlier?
- H.08 Would having earlier closing times for bars and a one-way door at 1am make you drink less?
- H.12 Would you prefer to have later hours for off-licence sales to allow you to purchase your alcohol for the night prior to going out for a night out?
- H.15 Riccarton, Merivale, Shirley, etc:] Do you believe that these areas should be addressed as specific precincts that are separate from the City and other suburban areas?
- H.19 Does restricting the nightlife in Christchurch and the Central City reduce your desirability to stay in Christchurch and recommend Christchurch to others?

Graph 5



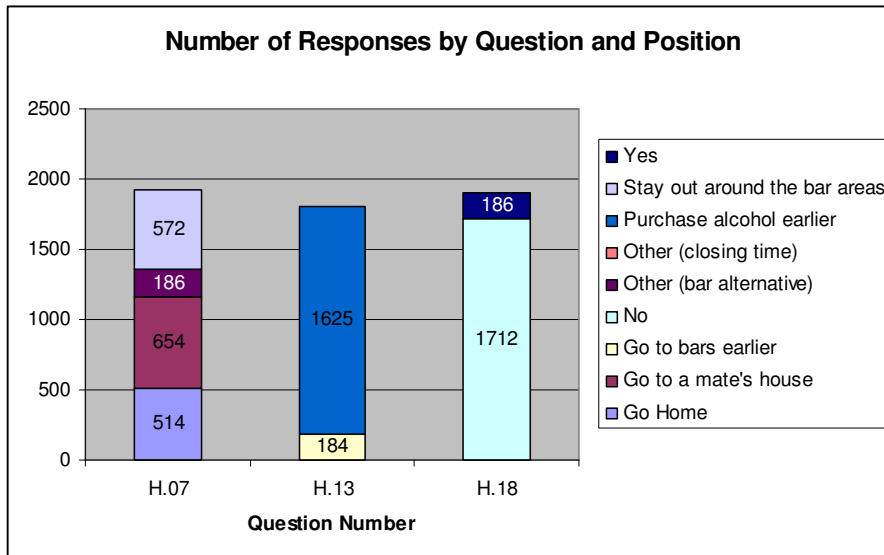
Graph 6 below shows the answers given by submitters to the following questions:

H.07 If you did not get in to a bar by the 1am closing time [what] would you be likely to [do]?

H.13 If the hours for off-licence sales (supermarkets, bottle stores) were reduced, would you still purchase alcohol for the night prior to going out for a night out or would you go to a bar/restaurant earlier instead?

H.18 Based on what you know of the draft LAP, do you support the direction taken by the Council to reduce the hours of trading for bars, restaurants and night-clubs throughout Christchurch?

Graph 6



Summary of additional comments made by submitters using the Hospitality Association New Zealand survey/submission form

Question: Do you think other areas around Christchurch should also have later trading? - If Yes, where?

Over 1,100 submitters suggested a variety of areas. Over 25 per cent of submitters thought Riccarton should have later trading, almost 20 per cent identified that Merivale should have later trading and over 15 per cent noted Addington/Lincoln Road. Other areas that suggested were Shirley and The Palms, Victoria Street, Papanui/Northlands, Woolston, Ilam, Hornby, New Brighton, Lyttelton, Sydenham and St Albans. Seven per cent thought that all bars should have later trading hours. Areas where premises should not have later trading included bars in residential areas and those with irresponsible hosts.

Question: What do you consider is an appropriate closing time for the Central Christchurch hospitality area - other comments?

Over 700 submitters commented. Many wanted to see later trading hours for the Central City including a later one-way door. They said that the reduced hours will deter young people staying in the city and tourists visiting. The policy will 'kill the city', deter investment, make it boring and there is a need for places for students, tourists and young people to go as they like late nights. Earlier closing times will mean that there are not places for hospitality staff and shift workers to go after work.

Other common comments included:

- Closing times should be determined on a case-by-case basis or by bars themselves.
- 3am closing is suitable for some bars, but others should be able to go later, and some should be able to have 24 hour licences.
- Areas that provide entertainment should be allowed to open later.
- Not everyone is ready to go home at 3am and if everyone is forced onto the streets – en masse - with nowhere to go there could be problems.
- Bars are safer, controlled environments compared to house parties so the hours should encourage rather than deter patronage.
- Precincts or clusters of bars that are allowed to be open later are easier to police.

Question: Would having earlier closing times for bars and a one-way door at 1am make you drink less?

A large number thought that they would drink the same amount or more, just in a shorter time so that they can get to bars before the 1am one-way door commenced; others said that they would stay home or go to parties instead, as it would not be worth travelling into town.

Very few submitters thought that earlier closing times and a one-way door would make them drink less. Others said they do not go out to drink alcohol but to see bands, music, DJs and for social activities so the amount they consume would not change.

Question: Do you believe that a one-way door in the Central City will assist in reducing alcohol-related issues and do you have any other comments you wish to add on this matter?

Over 650 comments were made. In summary:

- A one-way door will mean that people refused entry will cause problems on the streets.
- It will create problems in suburban areas as people will remain there, drinking in uncontrolled environments, rather than travelling into the Central City.
- People will drink more, faster, in order to be able to arrive before the one-way door starts.
- A one-way door policy in the Central City is acceptable, but should start at a later hour.
- A one-way door should also be implemented in the suburbs.
- One-way door restrictions will inhibit people's movement between bars to meet people, listen to different music and visit different venues.

Question: What do you consider is an appropriate closing time for off-licence sales?

Of the almost 150 responses to this question, around 20 per cent wanted off-licence sales to be 24 hours a day. A further 20 per cent suggested off-licences should be open until midnight. Varied hours of trading on different days of the week were suggested.

Other comments included:

- Supermarkets should be able to sell throughout their hours of opening.
- Shop owners should be able to decide when they open or it be decided case-by-case.
- Longer trading hours will accommodate shift workers and those who do their grocery shopping later in the evening or early morning.

- Off-licences' hours won't reduce harm - price and preloading are the problems.
- People will change their shopping habits and stock up before closing time; others thought that reducing hours of off-licences is a way to reduce preloading and to encourage alcohol consumption in a controlled environment.

Question: If the hours for off-licence sales were reduced, would you still purchase alcohol for the night prior to going out for a night or would you go to a bar/restaurant earlier instead – any other comment?

In summary, common comments were:

- Cheaper priced product from off-licences drive decisions about where and when people buy alcohol from them.
- Some people need or prefer to purchase alcohol during their normal grocery shop which may be early morning or in the evening, and others don't work standard hours.
- Earlier closing times would affect lifestyle and social habits e.g. summer barbeques, catering for unexpected guests, buying a bottle for a dinner out, and those who do shopping later in the evening either from preference or because of shift work.
- Reducing off-licence hours is a good start but more needs to be done to make controlled drinking more attractive.
- A change in hours will not affect the amount purchased.

Question: Do you believe that areas 'like Riccarton, Merivale, Shirley etc' should be addressed as specific precincts that are separate from the City and other suburban areas and what is an appropriate closing time for them?

Over 100 submitters commented:

- The most frequent closing times suggested were 24 hour opening, 4am and 5am.
- Hours of bars across the city should all be the same as the CBD.
- Premises should be able to determine their own hours or on a case-by-case basis.
- Proximity to residential areas, noise issues and competency of premise management should be taken into account.
- Bars providing entertainment should be open longer.

Question: Based on what you know of the LAP, do you support the direction taken by the Council to reduce the hours of trading for bars, restaurants and night clubs throughout Christchurch?

Some submitters commented that they did support the policy, others supported parts but it needed refinement e.g. the Central City area needs to be larger, and that some bars need to stay open longer. More disagreed with the draft LAP: it will not keep young people and tourists in the city; there will be more alcohol-related issues with the changes in hours of trade and the city will miss the chance to develop a vibrant nightlife. Earlier closing hours will cause disruption in residential areas with more house parties and will do nothing to address the alcohol-related problems of the city. Music and entertainment venues are 'punished' by the policy. Some said that there was no need to change anything as there were not any problems that required addressing.

Does restricting the nightlife in Christchurch and the Central City reduce your desirability to stay in Christchurch and recommend Christchurch to others?

Frequent comments included:

- Musicians and hospitality workers said that they will think about moving from the city and that the draft LAP would make the city unattractive to rebuild workers.
- Students, graduates and young professionals said that nightlife is important in deciding where to study, live and work and the draft LAP would be a deterrent. Others commented that they no longer live in Christchurch and one of the reasons for leaving was the lack of nightlife in the city after the earthquakes. They do not recommend Christchurch to others as a place to live or visit.
- Longer hours of nightlife in other cities in New Zealand and Australia are more appealing to young people.
- People in a city socialise through the nightlife.
- Bar owners would choose to leave the city to other more desirable cities.
- Conversely, some said that there is more to Christchurch than bars.

8.3. Chch Late Facebook submissions' summary

The Chch Late Facebook page was set up to oppose the proposed LAP². A link was given to an online submission form created by the group. Handwritten submission forms were also completed during evenings on Victoria Street. The Facebook page was very active and by the end of June had over 8,000 Likes on it. A total of 1,078 submissions were received. The online submission made up around two thirds of these submitters while the rest filled in hand-written forms.

Chch Late's online submission form had eight pre-ticked statements that submitters were asked to either leave ticked (in agreement) or de-select. A ninth pre-ticked statement noted if submitters wanted to be heard in the hearings. In the printed forms, these statements needed to be ticked to indicate support. The focus of the form was the proposed trading hours for on-licenses and the one-way restriction in the Central City area. The majority of submitters agreed with all of the prompted statements below:

1. It is not fair to stop me from going out for a drink and a dance or to see a band or deejay after 1am just because a minority of people behave badly. Closing for night-clubs should be 5am. *(more than 98 per cent agreed)*
2. It is not fair that I can only drink in a small part of the CBD – it will not provide enough variety of places to go nor cater for the diversity of cultures that a vibrant city should include. The same closing hours should apply throughout the entire city. *(94 per cent agreed)*
3. I do not think a one-way door is a bad idea in itself but 1am is too early. *(more than 92 per cent agreed)*
4. If CCC and Policy were to genuinely work in partnership with late night entertainment businesses they could find more effective ways of keeping troublemakers out of bars and clubs and away from the CBD, so the rest of us can have a social life. *(more than 94 per cent agreed)*
5. A well thought out policy could include stricter standards for bars that open later and measures like electronic data sharing between bars/ID scanning. *(more than 90 per cent agreed)*
6. Over-regulation and excessive control won't fix the city's issues and will only cause resentment. *(more than 93 per cent agreed)*
7. If Council proceed with this policy it will make it very unattractive for me to stay here. *(90 per cent agreed)*
8. Christchurch once had a world-class reputation for its emerging and underground club scene; this will be no more. *(more than 90 per cent agreed)*
9. I want to be heard. *(more than 60 per cent agreed)*

Additional comments were made by over 130 of the Save Chch submitters. These are summarised:

- The drinking culture is the problem and changing the times that bars can be open will not change this. Better education, parenting and public awareness are needed. A minority cause problems but the majority of people are being punished by the policy.
- It is not fair to only include part of the Central City in the 3am maximum closing hours. The late night hours should apply to all the Central City within the Four Avenues, with some mention also of Lincoln Road, Riccarton and Lyttelton. Late licenses should depend on the history of responsibility of the bar, not on where it is located.
- One-way doors are a good idea, but 1am is too early and it will deter some patrons from coming into the Central City at all. There will be an outflux of patrons at earlier-closing bars in order to get to others before 1am. People want to move between bars to listen to music and meet friends.
- Without late night bars, there will be house parties which are less well-controlled than bars. With a set closing time, people not ready to leave will be on the street – angry, causing fights and problems. With earlier closing, people will drink the same amount, but faster.
- Young people and tourists are important to this city: it needs young people to rebuild, start future businesses and add vibrancy. People are leaving the city because there is nothing to do, and restricting nightlife will cause more of this. Tourists will spend less time and money in the city.
- Shift workers and hospitality workers need somewhere to go after they finish work. The policy will also negatively affect hours of employment, jobs and incomes of hospitality and food employees, taxis, transport operators, musicians and bands.

² https://www.facebook.com/Chch_Late/posts/135856709951394

- There is a need for night-clubs that can run later than 3am. Musicians and bands play late at night and the reputation that Christchurch once had for good music events will be damaged if all night events can't be hosted. Those at music events don't cause trouble.

8.4. Summaries of submissions by key sectors and organisations

(a) Health sector

Nineteen submissions were received from groups or organisations within the sector. These were:

- He Waka Tapu (LAP256)
- Community and Public Health incorporating the submission from the Medical Officer of Health for Canterbury (LAP2523)
- Christchurch Hospital Emergency Department's Senior Nursing and Medical Team (Appendix 3 in LAP2523)
- ACC (LAP2852)
- The Salvation Army Hornby Community Ministries (LAP2856)
- Christchurch Primary Health Organisation (LAP2860)
- Consultant Emergency Physician, Canterbury District Health Board (LAP2877)
- Public Health Association, Canterbury and West Coast Branch (LAP2895)
- Problem Gambling Foundation of New Zealand (LAP2902)
- Health Promotion Agency (LAP2919)
- Canterbury Hospitals Medical Staff Association (LAP2918)
- Alcohol Healthwatch (LAP2922)
- Canterbury Alcohol and Other Drug Managers Advisory Group (LAP2925)
- Community Action Youth and Drugs (LAP2953)
- Mental Health Advocacy and Peer Support Trust (LAP2958)
- He Oranga Pounamu (LAP218)
- National Addiction Centre (LAP2771)
- Cancer Society (LAP2691)
- Pegasus Health (LAP2885)
- National Council of Women (LAP2746)

The great majority of these submitters provided considerable background and research information, in addition to comments in response to the questions. There were in addition several submissions from medical specialists and practitioners writing as individuals.

Maximum trading hours and one-way door provisions

These submitters strongly supported the draft LAP with many saying it is "a step in the right direction". Except for the Problem Gambling Foundation they were extremely supportive of the maximum trading hours and the one-way door provisions for on- and off-licensed premises. They provided a variety of reasons for their stance, which centred around research showing that reducing the availability of alcohol reduces all kinds of alcohol-related harms such as chronic disease, mental health problems, accidents, injuries, crime, violence, and sexual assaults, and noted that alcohol is not just any other commodity but is a most harmful recreational drug.

They were also concerned about the cost of alcohol-related harm to the health sector in time, money and resources which could be better directed to other health needs.

Christchurch Hospital Emergency Department's (ED) Senior Nursing and Medical Team, the Consultant Emergency Physician, and Canterbury Hospitals Medical Staff Association all pointed to the difficulties staff working in ED experience from groups of acutely intoxicated patients, particularly on weekends. They said it was common for all these groups to be hugely resource intensive, tying up both medical and security staff because of their abusive and violent behaviour and thus compromises other patients' care. They said almost all of the violence towards staff is alcohol fuelled.

The Mental Health Advocacy and Peer Support Trust said that as an organisation working with people affected by mental health and/or alcohol or other drug issues, they are very aware of the harm and distress caused by overuse of alcohol by individuals, their whānau and the community at large. Alcohol can exacerbate the experience of depression, and can cause anxiety and depression to family/whānau when a family member drinks to excess.

The Problem Gambling Foundation disagreed with the maximum hours, stating they 'do not believe it is in the public interest for alcohol to be sold on licensed premises from 8am'. They recommended that the maximum hours for on-licensed premises should be changed to 9.00am to 3am and for off-licenses to 9.00am to 1am.

Control on location and density of new bottle stores and taverns

However, the submitters were less enthusiastic about the draft LAP's proposed controls on the location of new bottle stores and taverns. Many submitters considered there should be more stringent controls on both location and density of these premises, citing research that shows the relationship between the density of outlets and alcohol-related harm; and the relationship between deprivation and outlet density where areas of higher deprivation have a higher density of outlets and hence higher incidences of alcohol-related harm.

Community and Public Health suggested that the draft LAP prescribe for a moratorium on the issuing of new bottle store and tavern licences across all areas outside the Central City, except where a Community Board expressly indicates that more licenses should be granted, and He Oranga Pounamu suggested there should be a sinking lid policy for off-licenses. Some submitters suggested there should be proximity conditions in relation to key community facilities such as schools and marae.

The National Council of Women said they would like to see the number of alcohol outlets further mediated by local consultation. They noted that at present, local advocates and ordinary residents have been unable to influence whether or not Council grants an on- or off-licence premises a licence, even with great effort. They would like to see a consultative process in this area taken more seriously so that local communities can truly have a say.

They also believed it would be worthwhile for the Council to adopt a 'sinking lid' for on- and off-licence premises, particularly in low-income areas and other areas where there is a high density of liquor outlets.

The submitters also suggested a variety of additional discretionary conditions including mandatory training for all bar staff, limits on the placement of advertising in and around off-licence premises, provision of public health information on reducing alcohol-related harm at off-licenses, and having a single alcohol display area in supermarkets.

(b) New Zealand Police

Overall

The Police (LAP2924) supported the package of proposals outlined in the draft LAP. The Police submission noted that, despite its small population, the central Christchurch area (pre-earthquake) accounted for almost 30 per cent of Canterbury District's total crime and that alcohol-related crime comprised a significant proportion of central Christchurch's policing resources and total crime. Since February 2011, there has been a displacement in alcohol-related issues across the Christchurch metropolitan area and new alcohol-related 'hot spots' for crime have been identified in Victoria Street, Merivale/Papanui, Riccarton Road, Shirley and Addington. Crime data from 2012 indicated that alcohol-related crime (such as disorder and violence) has increased in these areas since the earthquakes. The submission noted that in comparison with other areas of New Zealand, Christchurch City has disproportionately high levels of alcohol-related harm.

Hours for off-licences

Police supported the draft provisions reducing hours of trade for off-licences (9 am-9 pm). Their submission noted that approximately 76 per cent of alcohol in New Zealand is purchased at off-licences and 60 per cent of alcohol-related offences are linked to home and public consumption. The submission identified particular features of the Christchurch drinking culture: preloading, preloading on the street, disorder, breach of liquor ban and low level offences leading to serious offending.

Hours for on-licences – Restaurants/café

Police supported the proposed maximum trading hours (8am-1am) for restaurants and cafés.

Hours for on-licences – Taverns/bars/pubs/night-clubs/clubs in Christchurch Central Area A

Police supported the draft provisions relating to hours for these on-licences (8am-3am). The submission referred to a range of studies which conclude that extended late night trading hours lead to increased consumption and related harms, while reduced trading hours are found to decrease alcohol-related harms. The Police preferred a fixed closing time of 3am and submitted that the experience of Timaru is relevant: in 2007 reduced trading hours (3am closing) in Timaru led to a drop in recorded violent offending, the offending was not displaced to an earlier time, nor to elsewhere in Timaru. The Police submitted that international evidence and police experience show that the negative consequences of longer trading hours outweigh the issues around a fixed closing time of 3am.

Central Area A - Boundaries

Police submitted that Central Area A should be well defined and enlarged to include the zone bounded by 'the Frame' to the south and east and the Avon to the north and west.

Central Area A - One-way door

Police supported the compulsory one-way door provision for Area A as 'one of the essential components of a LAP' to reduce the level of disorder and assaults as patrons move between licensed premises and to maximise the ability to stagger the dispersal of patrons at closing. The submission summarised a number of studies on 'one-way door' or 'lockout' controls and referred to the positive effects (a 22 per cent reduction in serious offending) of the voluntary one-way door operating in Christchurch before the earthquakes. Police submitted that 'not to have a one-way door provision or to dilute the provision' would dilute the harm reduction benefits of the draft LAP overall.

Hours for on-licences – Taverns/bars/pubs/night-clubs/clubs in Christchurch Central Area B and in suburban centres and rural townships

Police supported the draft provisions relating to maximum trading hours and the discretionary one-way door provision for taverns/bars/pubs/night-clubs and clubs within Christchurch Central Area B.

Location of premises - Restriction of new taverns and bottle stores to business zones

Police supported this draft provision but considered it is primarily a planning/community issue.

Discretionary Conditions

Police supported the draft provisions relating to discretionary conditions.

(c) Licensing inspectors

The submission from the licensing inspectors was primarily focussed on seeking changes to correct or clarify the wording of the provisions of the draft LAP. In terms of the overall direction of the LAP the inspectors stated that they “highly value the direction given in any policy particularly if it reflects community views”.

The submission supported the following provisions:

- 1am closing for cafes and restaurants.
- One-way-door restrictions as a tool to address the problems associated with migration between premises.
- 3am closing for premises holding an on-licence (except for hotel in-bedroom mini-bars).

The submission did not support the designated Central City Area A (3.00am closing) because; “Pre earthquake when a rugby match occurred in the city it has been estimated that 30,000 people came to inner city bars. The area proposed is too small to handle anywhere near these numbers. Having too small an area may simply intensify problems”. The submission asked for the areas set aside for late night venues to be reconsidered.

The submission suggested that it may be appropriate for LAP policy to be more flexible as regards to certain controls including:

- The opening hours of cafes / restaurants in certain circumstances e.g. for an airport café if flight schedules ‘open up’.
- Allowance for taverns to serve alcohol with breakfast service before 8am.
- The hours that a licence is granted for the first time.

The submission sought the following clarifications, minor amendments and corrections:

- Hotel mini-bar licences to be included in on-licence provisions.
- Additional LAP definitions e.g. Entertainment Venue, Theatre.
- Re-phrasing of clauses 2.1.1 and 2.2.1-2.2.4 (“The following maximum trading hours... apply to all premises operating under an ...licence) to ensure clarity and avoid ‘loopholes’.

(d) Hospitality sector

Submissions from the hospitality sector, with a few exceptions, strongly opposed provisions in the draft LAP relating to trading hours for on-licensed taverns/bars/pubs/night-clubs/clubs³, both in Central Areas A and B and elsewhere in the city. The sector largely supported the proposed off-licences' maximum trading hours of 9am – 9pm.

Hospitality New Zealand Canterbury Branch (LAP2515) and many bar, night-club, pub, tavern and hotel licensees made submissions. A number of these submitters cite or append to their submission an information paper prepared by the national office of Hospitality New Zealand, entitled '*Informing the debate on local alcohol policies – fact versus fiction*' (appended to LAP2519). In addition, Hospitality New Zealand initiated a Facebook survey/submission form which was completed by 1,929 people, including some licensees and many members of the public - summarised in section 8.3 of this report.

Hospitality New Zealand and its members' submissions sought the following changes to the LAP:

- Enlarged Central City area to include all the area 'within the Four Avenues'.
- 3am maximum closing for on-licensed premises in all the Central City 'within the Four Avenues', with up to a 5am closing, applied at discretion, for some premises.
- 3am closing for centres such as Riccarton, Addington and Merivale and areas such as Hornby, Shirley, Lyttelton and Akaroa.
- No change to the existing trading hours for on-licensed premises in suburban areas.
- A discretionary rather than compulsory one-way door in the Central City.

These submissions also included requests for policies which cannot be included in the LAP but which could be addressed through a broader alcohol strategy:

- Recognition of precinct-based accords e.g. in Riccarton and Addington and the existing accord in Victoria St).
- Greater enforcement of existing alcohol bans and increased use of them in precinct areas (e.g. Addington, Shirley), as an effective way of managing behaviour in public places.

The key reasons for their opposition to the draft proposals were:

- There needs to be provision for late night (up to 5 am) licences to enable late night entertainment, dancing and music: this will stimulate the Central City's rebuild as a vibrant place to visit and appeal in particular to young people, tourists and shift workers.
- 3am closing is more appropriate for suburban areas as local suburban premises fulfil a valuable community role.
- 3am closing on Victoria Street is consistent with its inclusion in the District Plan as an entertainment /hospitality precinct.
- The restrictions on hours of trading will be ineffective in reducing alcohol-related harm and will not address prevalent, harmful preloading and binge drinking behaviours.
- They will inhibit the recovery of the Central City's rebuild; licensees will not return or choose to locate in the Central City if they face much-reduced trading hours, combined with higher leasing, building and fit-out costs.
- Early closing will reduce the appeal of the city as a lively, attractive destination for tourists, conference attendees, shift workers and those who arrive, or wish to socialise, late at night.
- The rationale for the restrictions is based on a flawed assumption of behaviour change from patrons - that they will start coming to licensed premises earlier if the closing times are earlier (Hospitality New Zealand survey revealed 72.2 per cent said they would not go out earlier).
- The restrictions unfairly penalise the controlled drinking environments that on-licensed premises offer; much of the alcohol-related harm stems from off-licence purchases and drinking in uncontrolled environments such as homes and parties.
- The Thursday – Saturday night trading hours after midnight are the most profitable for bar and night-club owners and the proposed restrictions reduce their opportunity to trade profitably and retain their full complement of staff.
- The 1am one-way-door will lead to an exodus of drinkers from suburban premises after midnight (in time for them to get into Central City premises).
- A fixed closing time will create crowd management issues in the Central City compared with a safer 'soft' dispersal over varied closing hours.

³ These will subsequently be referred to as 'on-licensed premises' with the understanding that this does not include restaurants and cafes

- The size of the proposed Central Area A area is inadequate for the numbers of people regularly wanting to visit licensed premises and socialise in the Central City; its limited size will create more crowd congestion and negative behaviours.

Well over 100 individual hospitality sector submitters provided comments. Apart from those outlined above, other comments included:

- It would be fairer for bar owners to be made more individually responsible for clean-up and enforcement costs associated with late night trading e.g. rubbish clearing, additional enforcement.
- Bar and night-club owners should be able to choose their own closing hours as they understand their business operating environment: hours of trading should be decided case-by-case, based on owners' record as good operators.
- The differentiation between Central City and suburban closing hours disadvantages suburban premises: it reduces their opportunity to trade at the most profitable times of the evening and creates a privileged group of business owners in the Central City who can operate for longer.

(e) Off-licence retailers

Supermarkets

Submissions were received from Foodstuffs South Island Ltd (LAP2677), a cooperative company supplying Pak 'n Save, New World and Four Square supermarkets, and from Progressive Enterprises Ltd (LAP2903), owner of Countdown and franchiser of SuperValue and FreshChoice supermarkets. Collectively these submitters represent 36 supermarket stores in Christchurch City⁴. In addition there were submissions from the New Zealand Retailers Association (LAP2914) and from an individual supermarket owner.

Hours for off-licences

All these submitters opposed the draft LAP proposal for reduced hours for off-licence sales from supermarkets. They considered that the draft LAP proposal for shorter (9am-9pm) licensing hours for supermarkets will have significant negative impacts on business, employment and the convenience of shoppers and is not justified by empirical evidence. Submitters referred to their experience and reputation as responsible retailers of alcohol and referred to data showing that less than two per cent of supermarket sales are for alcohol only and that few sales of alcohol to young people (18-24) occur between the hours of 7am-9am and 9pm-11pm. The submitters also suggested that prospective purchasers of alcohol after 9pm would drive 'over the border' to Waimakariri and Selwyn Districts.

Location of premises:

The submitters supported the lack of restrictions on the location of supermarkets because they consider that issues of location of licensed premises should be addressed through Resource Management Act processes.

Bottle stores

Submissions were received from three national chains of bottle stores: Independent Liquor (LAP2643), Lion (LAP2695) and LiquorLand (LAP2614); the NZ Retailers Association and from a number of individual owners/operators of bottle stores.

Hours for off-licences:

Submissions from Independent Liquor, LiquorLand and from the Retailers Association opposed the draft LAP proposal for reduced hours for off-licence as these submitters considered that the national default hours of 7am-11pm are appropriate.

Lion, owner of Liquor King, opposed 9 pm closing and preferred 10pm closing. The submission preferred 10pm for the reasons that 10pm provided an 'appropriate balance' between harm minimisation, reasonable access and convenience and commercial viability.

Submissions from the local owners/operators opposed 9pm closing but advocated that the draft LAP provide for off-licence sales between 9am-10pm. All submitters supported the consistent approach within the draft LAP with regard to the permitted hours for sales from all off-licence premises.

Location of premises:

Submitters considered that responsible retailers of alcohol should not be restricted from opening in particular neighbourhoods or local centres⁵ and that issues of location should be considered individually for each new licensed premises. A number of submissions sought an amendment to the draft LAP so that any restrictions on the location of bottle stores should relate only to new premises, as a matter of fairness to the owners of existing premises (i.e. to allow for the transfer of a licence for an existing premise to a *new* owner/licensee).

⁴ Note: The following information as to the numbers (in brackets) and hours of supermarkets operating currently (July 2013) in Christchurch City is taken from supermarket websites:

Countdown (total=11); (2) 7am-9pm; (3) 7am-10pm; (1) 8am-10pm;(3) 7am-11pm; (2)6am-12 midnight.

FreshChoice (total=3); (1)7am-9pm; (1)7am-11pm; (1)7am-12 midnight.

Foursquare (total=1); 8am-7pm.

New World (total= 10); (1)7am-9pm; (4)7.30am-9pm; (3)8am-9pm; (2)7.30am-10pm.

Pak'nSave (total =5);7am-11pm

SuperValue (total=6); (1)7am-8pm; (1)8am-9pm;(4)7am-9pm;

⁵ Note: The draft LAP currently proposes that new bottle stores be restricted to locations which are zoned for business, including neighbourhood and local centres.

(f) Alcohol industry

Wine growers

Submissions were received from Wines of Canterbury (LAP2679) representing 60 wine growers, NZ Wine Growers (LAP2703) and an individual wine producer. The submissions from Wines of Canterbury and the NZ Wine Growers were primarily concerned with ensuring that the draft LAP did not restrict 'cellar door' and remote sales of wine. Both submissions requested that any LAP restrictions on off-licence sale differentiate between their members' low risk (cellar doors, remote sales and special licences) sales and other more risky premises. Wines of Canterbury were concerned that the draft LAP restrictions on bottle stores to business zones will apply for cellar door off-licences: they wanted the definition of cellar door off-licences and taverns to exclude cellar door sales and functions hosted by wineries.

Manufacturers and distributors of spirits

Several submissions were received from manufacturers distributors and retailers of spirits and from the Distilled Spirits Association of NZ (LAP2920).

These submissions referred to a lack of evidence that RTDs (Ready to Drink) are more harmful than other kinds of alcohol in contributing to the binge drinking culture. The Association provided information on a voluntary industry code of practice which would limit the alcohol strength of any container of RTD to seven per cent Alcohol by Volume (ABV) with no more than two standard drinks per container.

(g) Tourism and business organisations

Submissions were received from three tourist organisations: Christchurch and Canterbury Tourism (CCT) (LAP2674), SKAL International (representing 87 members with tourism related interests) (LAP2926) and the Tourism Industry Association NZ (TIA) (LAP2650) representing nine hotels in Christchurch.

CCT supported the draft LAP's 3am closing for on-licences in the Central City because it will, in the future, provide visitors with the opportunity to enjoy the city to a reasonably late hour while reducing the effects of high levels of anti-social behaviour and noise, experienced historically by visitors in inner city accommodation. However, all three organisations submitted that until the CBD is fully operational, (at least three years), existing licence holders in the suburbs should retain their current trading hours. SKAL International also asked for post-3am for some premises and staggered closing hours.

Submitters requested that hotels should be able to serve bona-fide house guests at any time on any day and that the entire hotel is considered the licensed premise, continuing the current situation where a mini-bar forms part of the on-licence rather than being an off-licence.

The submitters also requested that the Council consider other methods for controlling the negative social aspects of drinking, such as prohibiting drunkenness in a public place, drinking alcohol in public, or having open vessels of alcohol in vehicles.

The Lyttelton Harbour Business Association opposed the draft LAP's 1am closing for on-licences in rural townships and requested 3am closing for Lyttelton without a one-way-door restriction. It believed the township's venues adequately self-police. The submission referred to fostering Lyttelton's recovery and the importance of the entertainment venues to its local culture and prosperity.

(h) Community Boards

Community Boards supported the direction of the draft LAP and the need to get a balance between reducing alcohol-related harm and the vibrant city and recovering economy. (LAP333, 359, 2435, 2690, 2853, 2910, 2921 and 2931.)

Trading Hours for on-licensed premises in Central Area A

Community Boards generally supported the proposed trading hours of the Central Area A. However, specific comments made included:

- Some community boards would like to see Central Area B, the rest of the Central City and some clearly defined suburban centres, all included in the times proposed for Central City A.

- 2am closing time elsewhere in the Central City outside the precincts with a discretionary one-way door policy.
- It was recommended that the Council take particular note of the views of those living and/or operating businesses in the Central City entertainment precincts and the Victoria Street area.

Trading Hours for on-licensed premises (Suburbs and Central City B)

These hours were supported by Community Boards for residential areas but other comments included:

- Later trading could apply to some clearly defined suburban centres which have large clusters of restaurants and/or bars (Papanui Road/Merivale, Riccarton Road, Ferrymead, some areas of Woolston and Sumner, and Lyttelton).
- The Lyttelton/Mt Herbert Community Board said that Lyttelton has distinctive character and a community of a strong music and entertainment culture. A limited number of venues (up to three) could be open later than 1am in Lyttelton to encourage economic activity, employment, music and entertainment and the recovery of the town. They also said that some clubs in the areas sit outside suburban centres and rural townships.
- Some said these hours should be determined on a case-by-case basis.
- Some would like to see a one-way door restriction where appropriate in the suburbs.

Trading Hours for off-licensed premises

The trading hours of 9am-9pm are supported by the majority of Community Boards commenting on this provision, however some Community Boards suggested adjustments:

- Akaroa/Wairewa would like the hours to be extended to 10pm, perhaps for specific areas such as Akaroa which is a tourist town, where visitors may arrive late and wish to purchase alcohol.
- Burwood/Pegasus would like the hours for off-licences to be 10am-10pm as this is better aligned to the existing hours of trading.
- Spreydon/Heathcote noted that the provision must include supermarkets and supports both 9am-9pm closing and 11am-8pm closing.

One-way door restrictions

A one-way door restriction is supported by those who commented on it. They said that incidents are caused by people moving between venues and the merits of the one-way door restriction have been reported by the Police.

- Some of the Fendalton/Waimairi Community Board members supported 2am for the one-way door.
- Other suburban areas were suggested for one-way door restrictions.
- Some suggested that the restriction should be discretionary.

Discretionary conditions

Boards supported the discretionary conditions and suggested some others. These included:

- Size and expiry time of selling liquor – an end time for selling alcohol, add size of last orders (no doubles, multiple drink purchases, maximum volume).
- Food and water provision.
- Host responsibility with offences penalised.
- Special licences for sporting, cultural and music events with appropriate safety plans.
- Safety and security plans for licensed premises. There should be a coordinated approach whereby individual owners take collective security measures.
- One-way door policy to be a discretionary condition.
- Consideration given to special licences to extend to 3am where appropriate.

Density

- The number of licences that are acceptable for a given area should be clearly stated to developers.
- They supported allowing alcohol businesses to operate in zoned areas.
- The only town centres on Banks Peninsula are Akaroa and Lyttelton. The LAP will not allow for a licence outside of these areas in a smaller settlement or a winery in a rural area so they suggested allowance for licences on Banks Peninsula through resource consent.
- Off-licences should not be able to be established in predominantly residential areas such as St. Martins.
- Sinking lid on off-licences to a certain ratio per head of population (suggested one per 30,000 adults).

Trading Hours for restaurants and cafes

- These did not attract many comments but were supported by those Community Boards that did comment.

Other comments

- Through the District Plan review, ensure that there is strong direction to developers on the community's view in relation to alcohol.
- Host responsibility to extend to party bus operators.
- Develop a bylaw making it an offence to be drunk in public.
- Licences on boats could have an impact on the settlements around Lyttelton Harbour. Occasional events are acceptable, but regular operation is not.
- The community to have a voice in the decision making process (input into District Licensing Committee, the ability to veto undesirable applications)
- Global curfews – problem drinkers to be banned from all licensed premises in the city.
- Recommendation to review the LAP annually or biennially to enable efficacy to be monitored.
- CDHB to provide brief intervention assessment based on alcohol-related accident and emergency admissions.
- They noted that cultural and social changes are required in addition to hours of opening.

(i) Māori

He Oranga Pounamu (HOP) and the Canterbury Māori Community Consultation Network (LAP218) said that alcohol misuse is damaging our communities and our country and we need to work together to change our drinking culture. The effect of alcohol misuse is wider than just the individual. They said it is necessary to limit accessibility to alcohol to make an impact for Māori and the wider community.

Off-licences

They said there is a disproportionate density of off-licence premises in lower socioeconomic communities compared to the more affluent communities. They supported the reduction of operating hours for off-licences and Sunday closure. Reducing hours of off-licences (including supermarkets) means that harmful effects of alcohol such as preloading could be minimised. They also suggested a sinking lid policy for off-licences and a ban on window advertising of discounted prices.

On-licences and one-way door

HOP supported the one-way door policy. They said that earlier closing times would reduce the number of people coming into the city to drink, positively affecting crime and disorder. Later opening times were also supported and it was noted that midday opening was favoured over 11 am.

Location and density

HOP recommended that the number of on-and off-licences should be restricted, on a population ratio or be related to deprivation indices, socio-economic data, locality and health statistics. Premises selling alcohol (on and off) should not be permitted near schools /marae /churches /community centres /health providers. These organisations and institutions educate and provide a safe haven for the community.

Discretionary conditions

He Oranga Pounamu suggested the following:

- Breath testing of patrons before allowing entry.
- Free water, affordable kai, low cost taxi service.
- Host responsibility and staff training considered in the approval and retention of all licences.
- A three-strike infringement process leading to loss of licence for an extended period.

Other

He Waka Tapu (LAP256) agreed with all the proposals in the draft LAP.

(j) Community groups, residents' associations and schools

Submissions from neighbourhood groups supported the direction of the draft LAP. The provisions of most importance to neighbourhood groups and residents' associations were the controls on suburban off-licences and on-licences through both hours and locations. They liked the differentiation between suburban and Central City areas and thought further restriction of when and where alcohol can be sold, including density, would be beneficial.

The maximum trading hours for off-licences was supported by six of the eleven residents' associations that submitted. All those that did not support the proposed provision would like to see further restricted

trading hours as a means of reducing preloading and still providing reasonable access: alternatives were 10am or 11am for opening time, with 7pm or 10pm for maximum closing hours.

Seven residents' groups said that they agreed with the proposed location of new bottle stores being restricted to business zones. Those that did not agree with the proposed location provision would like to see it further restricted to include restriction by density:

- Though the draft LAP limits where bottle stores can be located, there is a need also to restrict the number of stores that can be located in an area.
- They provided links between alcohol outlet density and alcohol consumption, alcohol-related harms and community degradation and said the social framework could be jeopardised if density was not limited.
- They suggested a cap on the number of liquor licences issued and a sinking lid policy used where there is high density or persistent alcohol problems.
- The Addington Neighbourhood Association (LAP2952) would not like to see any more off-licence premises in the area and the Beckenham Neighbourhood Association (LAP331) said they would support the withdrawal of licences from liquor outlets.

Those that did not support the proposed location of new taverns also noted density as the reason. Limiting premises to one area is not limiting the number that can locate in that area and residents' associations said this needs to be addressed:

- The Addington Neighbourhood Association thought there should be a limit on the number of licensed premises in the Addington area.
- Groups provided the same reasoning for concerns about the density of the proposed location of new taverns as they did for the proposed location of new bottle stores.

Residents' groups also commented on the need for community consultation and engagement about new licences in local communities:

- Communities should have more say about the granting of licences in their areas.
- Decisions about licences should be responsive to residents' concerns living in the areas.
- The draft LAP should outline how communities will be consulted in the application process.
- Some were pleased that communities will have power to influence alcohol-related development, but would like the opportunity to have stronger community control.

Other proposals in the draft LAP supported by residents' associations were:

- The maximum trading hours for on-licensed premises in the Central City. The Victoria Neighbourhood Association (LAP2627) supported 3am closing in areas away from residential areas.
- The proposed maximum trading hours for on-licensed premises in other parts of the city. The Victoria Neighbourhood Association noted this is their main concern and they emphasised that they would like the Victoria Street area remain included in the 1am closing area.
- The proposed maximum trading hours for restaurants and cafes in all parts of the city.
- The proposed one-way door restrictions, although one association thought it would limit freedom of choice.
- The special licence conditions.
- Host responsibility.

Schools

Addington School (LAP182) agreed with all the provisions in the draft LAP.

St. Martins School (LAP2716) had concerns about the harms off-licences have for their young people. They said communities need to be maintained as positive and safe environments and the draft LAP is proactive in contributing to this through a specified licensing process and policy that manages outlet density. However, they said consideration must be given to school location when granting licences (both off and on) and the draft LAP should have terms and conditions that require consultation with schools in the proximity of proposed locations.

It noted that greater off-licence density increases the volume of alcohol in the home as well as friends' and families' access to alcohol. This results in increased alcohol-related harms such as hospital admissions due to alcohol poisoning, alcohol-related assaults and falls, and increased incidents of harassment and intimidation.

Secondary harms include obtrusive alcohol price advertisements, reduced quality of public amenities, such as community parks or shopping centres being strewn with broken glass and graffiti. It said younger people are particularly at risk to some of these secondary harms and noted the link between off-licence density and higher levels of anti-social behaviours, drug and alcohol offences, family violence, property abuse, property damage, traffic offences and motor vehicle accidents.

Other community groups

The Salvation Army Hornby Community Ministries (LAP2856) agreed with all proposals in the draft LAP. They said that restricted hours are positive and reduced availability of alcohol will benefit many of their clients.

Anglican Life (LAP2528) proposed some additional restrictions. It would like to see density restrictions contained within the draft LAP for off-licence premises by either imposing a cap or a minimum distance between stores and noted that density in an area drives competition, and targets specific and vulnerable customers. It would also like to see restrictions on licensed premises' location near schools - young people are vulnerable to alcohol and need protection from it. It also suggested further discretionary conditions around the location of alcohol in supermarkets and the display of safe drinking messages in bottle stores and supermarkets.

Community Watch Riccarton (LAP289) agreed with all the provisions in the policy, supported the direction of it and did not think that any aspects needed to be changed.

The Phillipstown Neighbourhood Safety Panel (LAP2686) disagreed with the maximum trading hours for on-licensed premises in the Central City and other parts: nightlife will be concentrated in too small an area with too few operators. It wanted the Central Area A to also include Central Area B, bounded by the inside border of the Frame and the river. It noted that some of the suburbs, including Banks Peninsula, are very far away from Central Area A. The Panel would like consultation to be undertaken with specific communities (Lyttelton and Akaroa) on the option of these communities having a Central A Zone of their own. For the Panel, the best parts of the draft LAP were the hours of off-licensed premises, the one-way door policy, and the concentration of bars in the Central City.

(k) CERA Community Forum

The CERA Community Forum (LAP4108) opposed many of the restrictions in the draft LAP and preferred alternative measures, such as bylaw mechanisms, to discourage anti-social behaviour. While the Forum supported the maximum hours of 9am-9pm for off-licensed premises, it sought more liberal and flexible provision for on-licences; longer hours (up to 5am for good operators) for on-licensed premises; no one-way-door and an enlarged Central Area A.

(l) Tertiary education organisations

The Canterbury Tertiary Settings Forum (LAP2915) only commented on the off-licence provisions in the draft LAP.

Hours for off-licences

The members supported the reduction of trading hours of off-licensed premises and believe this will contribute to the minimisation of harm which is directly related to the purchase of alcohol.

Controls on the location of bottle stores

Its members supported greater control of the location of new bottle stores and said this will assist in alleviating the alcohol-related harm which is associated with alcohol being readily available.

The University of Canterbury (LAP2906) considered two key questions when looking at the draft LAP:

- 1 Would the draft policy entice or deter students from coming to Christchurch?
- 2 Would the draft policy enhance or diminish perceptions of Christchurch's social environment?

- 1 The University has found that on average six bars, cafes and restaurants have re-opened in Christchurch every week since February 2011. They considered that these statistics will be more compelling to prospective students (in terms of social and work opportunities) than the particular

operating hours of local establishments. Thus they did not see the draft policy being the overriding factor in students determining whether to come to Christchurch or not.

- 2 The University said it was acutely aware of the risks associated with excessive alcohol consumption and they work very hard to ensure their students, when they socialise at licensed venues on campus, are safe. They said they would support any initiatives designed to enhance personal safety. On that basis, they did not see the draft policy diminishing perceptions of Christchurch's social environment. They fully endorsed the goals of the LAP, particularly the encouragement of licensed environments that foster positive, responsible drinking behaviour and minimise alcohol-related harm.

(m) Representatives of youth

(This includes University of Canterbury Students Association (LAP2927), Christchurch Youth Council (LAP2723), LAWSOC (LAP2909), Youth and Cultural Development (LAP119) and CPIT Business Society (LAP55).)

Generally, these groups found the draft LAP too restrictive in some aspects and said it does not address the problem of preloading. They noted negative effects on business and vibrancy of the city and on making the city attractive to young people.

Hours for off-licences

Generally these groups support the proposed hours for off-licences as a way to minimise alcohol-related harm. They said that off-licences produce cheap alcohol and more work needed to be done to tackle the problem of preloading. Points raised included:

- Earlier closing of off-licences may mean that people will spend more time at on-licensed premises and reduce the risks of high levels of intoxication on streets. Parties in the suburbs have been problematic since the earthquakes as there is a lack of late night entertainment at on-licensed, supervised venues.
- The proposed hours will lessen the occurrence of intoxicated people doing 'top-up' shopping.
- However, others said that shorter hours could encourage stock-piling and do nothing to reduce binge drinking.
- They also noted that density of premises is linked with alcohol-related harm and crime.

Hours for on-licences – Central City entertainment precincts

Key comments were:

- Central Area A needs to be larger to accommodate the number of people and different groups of people that will want to use it.
- Reduced hours mean fewer part time work opportunities for students, which may mean students are less likely to choose Christchurch; it will provide less employment in the sector in general.
- Bands, DJs and musicians will find it harder to establish a career in Christchurch and it will reduce the chance of headline gigs being played in Christchurch.
- Reduced opening hours will not solve problems with alcohol-related harm, only shift it. Indeed they may create incentives to preload faster and drink at home/house parties instead of town.
- It would decrease tourism and student numbers: nightlife and attractions are part of the decision choice tourists and students make.
- Blanket closing would put greater pressure on taxi services; there need to be late night buses.
- The area open to 3am is too small and does not allow for large volumes of people. There will be overcrowding of the bars that stay open until 3am.
- Central Area A should include the new convention centre, town hall and performance arts precinct.

Hours for on-licences – suburban and other Central City areas

- Migration of people into the late-closing area could cause disruptions to neighbourhoods they walk past.
- Binge drinking will be more prevalent as there is less time to consume alcohol.
- Earlier closing in the suburbs will mean that bar owners will instead open premises in the Central City causing issues between different social groups as they are all forced into smaller areas. There could be greater problems for the Police.

One-way door policy

Most of these submitters did not support the one-way door policy. They said it will cause more harm and problems in the streets and would not affect all bars evenly:

- Problems will still happen, but at a different time. People don't want to stay in the same bar until it closes. The one-way door policy punishes the responsible majority.
- It will hurt smaller bars as people will rush to finish last drinks and head to larger bars if they want to be somewhere busier.
- There will be people who miss out getting into bars. This could cause a dangerous environment in the streets as those wandering the streets are those that have not been let into bars and will increase aggravation when people want to make a last minute move to larger premises.
- It could cause an earlier migration from suburban bars which will put pressure on taxis and transport. Others said that people may choose not to come into the city at all and instead choose to stay at home or could continue to drink in suburbs, in uncontrolled environments.
- A one-way door policy to a precinct, rather than to each individual bar was looked at more positively.

Other

- Licensed environments that foster positive, responsible drinking behaviour and minimise alcohol-related harm should be encouraged.
- Businesses may reconsider plans to reinvest as the draft LAP could influence return on investment.
- Licensees should be actively involved in solutions to address issues.
- Consideration should be given to restrictions on the alcohol content and last orders, along with increased police and security requirements within the areas around bars, a centralised system for checking IDs and higher responsibility on managers to take responsibility for intoxicated patrons.
- Develop campaigns to encourage better drinking and educate about alcohol-related harm.

The Child And Youth Mortality Review Group (LAP2959) and Youth and Cultural Development Society supported all aspects of the draft LAP. However, they said that the restriction on the number of events with special licences is too limited and venues should be allowed any number of one-off special licenses as long as host responsibility is ensured.

(n) Sports clubs

The Sporting Clubs Association of New Zealand (LAP2595) submitted that one-way door policies could not work in the sporting and community club facilities and that these clubs should not be included in this part of the policy. They said that the proposed hours are sensible for sports and community clubs.

Edgware Tennis Club (LAP2887) noted that businesses that have good management of patrons should be given flexibility to stay open longer. They said that for many patrons, 1am is too early for Central City premises to close and the policy should have more emphasis on the management and control of patrons by the licensee. Other submitters supported earlier closing hours for all premises including clubs.

(o) CERA

The submission from CERA (LAP2907) sought no changes to the draft LAP but requested that any amendments that are made to the draft LAP do not further restrict trading hours in Central Areas A and B. The submission noted that the Minister of Earthquake Recovery is currently reviewing the 'noise categories', as defined in the Amendments to Christchurch City Council's District Plan (Appendix 1 of the Christchurch Central Recovery Plan 2012). The draft LAP's Central Areas A and B areas uses the 'noise provisions' to define the footprint of the proposed 3am closing area for bars and night-clubs.

Overall CERA would like a LAP which balances social and cultural wellbeing, the economic interests of hospitality, tourism and residential redevelopment and enabling of strong, connected and safe communities.

Appendix 1

Meetings and drop-in days attended by staff.

Date	Group / venue
Friday 31 May	Ethnic Council (material distributed)
Friday 31 May, 8.30-9.30am	Riccarton Ilam Community Safety Joint Working Party
Wednesday 5 June, 12-1.30pm	Hornby Community Trust meeting
Wednesday 5 June, 5.30pm	Riccarton Neighbourhood meeting
Thursday 6 June, daytime	MALL #1 The Hub, Hornby 10am-5pm
Friday 7 June, 10.30am	Shirley Liaison meeting
Monday 10 June	Linwood Liaison meeting
Tuesday 11 June, 10.30am- 12 noon	Little River – Peninsula network meeting
Tuesday 11 June, 12 noon – 1.30pm	INFORMATION SESSION #1. CPIT Marae – Te Puna Wanaka, Coventry St and Library/foyer drop-in
Wednesday 12 June, 10am arrive	Fendalton network meeting
Wednesday 12 June, 10.30-11.30am	Child and Youth workers network meeting
Wednesday 12 June, 10am – 12.30pm	University of Canterbury, Library/café foyer
Wednesday 12 June, 12 noon	Riccarton Liaison meeting
Wednesday 12 June, 6-7.30pm	INFORMATION SESSION #2 , North City Church, 95a Sawyers Arms Road
Thursday 13 June, daytime	MALL #2 Eastgate 10am – 5pm
Thursday 13 June, 6-7.30pm	INFORMATION SESSION #3 , Cashmere Club, 50 Colombo St
Saturday 15 June, morning	Lyttelton Farmers Market
Saturday 15 June, morning	Migrant forum (Pegasus)
Tuesday 18 June, 3-4pm	Sydenham, Addington, Waltham network meeting
Thursday 20 June, 10am – 5pm	MALL #3 South City Mall, 10am – 3.30pm
Thursday 20 June, 6.30pm	CERA Community Forum (postponed due to snow; sent material instead to coordinator)
Thursday 20 June	Aranui Health Day stall (cancelled due to snow)
Monday 24 June, 12 noon – 1pm	Akaroa network meeting
Monday 24 June, 1.30pm	Lyttelton Mt Herbert network meeting
Monday 24 June, 7.30pm	Halswell Residents Assn (requested)
Tuesday 25 June, 11am – 12 noon	Disability Advisory Group
Tuesday 25 June	New Brighton Library drop-in
Wednesday 26 June, 1.30pm	Older Adults network (Spreydon Heathcote) meeting
Wednesday 26 June, 10am – 3.30pm	South City Mall
Thursday 27 June, 10.30am	Papanui Liaison meeting
Thursday 27 June	Parklands Library drop-in

Appendix 2

A total of 4,060 submissions were received.

This lists those submitters that identified themselves as representing an organisation.

Submitter type	Number
Hospitality and Tourism Industry (Bars, security, events, musicians, developers and landlords)	71
Health, medical, NGO and community-based groups	25
Neighbourhood Groups	14
Off-licences and associations	13
Community Boards and Political Parties	10
Groups of young people and organisations representing them	9
Central and Local Government Organisations	5
Wineries	3
Sports Clubs	3
Hotels	3
Police	2
Māori Organisations	2
Business Association	1
TOTAL	161

There may be additional submitters who are representing organisations but did not identify this in their submission.