

## What We Heard Report Summary

Administration met with a number of stakeholders between April and June, 2018, to gain a better understanding of the impacts associated with liquor stores, and to identify best practices and other options to manage the impacts. Through conversations with stakeholders, the following impacts were identified:

1. Health and safety impacts relating to:
  - social disorder from overconsumption of alcohol;
  - health issues in association with addiction and family abuse;
  - predatory sales to vulnerable populations and customers being overserved; and
  - increased crime, such as theft and vandalism.
2. Aesthetic impacts identified related to:
  - unsightly appearance of liquor store buildings or storefronts, such as bars and posters covering windows; and
  - appearances enabling perceptions that the store or area is unsafe.

As noted in the stakeholder summaries below, it became apparent that operators can influence the impacts liquor stores have, through the maintenance and appearance of their business, what products they carry, the prices they charge, and their compliance with provincial licencing requirements. It was consistently heard from stakeholders that some liquor stores target vulnerable groups, either by over-serving intoxicated individuals, or lowering prices on single-serve type products during certain times of the month. Stakeholders indicated a need for improved enforcement of provincial requirements, and that more education and training is needed for operators to create awareness on the relationship between business practices and impacts to surrounding communities.

Another recurring issue was the appearance of liquor storefronts. A number of stakeholders noted the need for improved design regulations and how the appearance of a store can influence the perceptions of how safe an area is, and affects the overall image of street. Stakeholders noted concern with bars and posters blocking sightlines into and out of the store, resulting in less passive surveillance.

In consideration of land use, stakeholders identified a number of ways that Zoning Bylaw 12800 could be improved. Some of the suggestions included a context based approach, such as allowing more stores to serve high density areas. A number of stakeholders indicated support for additional opportunities for liquor stores and reduced separation distances in the downtown core. Many stakeholders also called for clear and simple regulations, that provide more certainty for businesses and developers, as well as improved design regulations related to crime prevention and appearances.

In order to gather feedback on the possible options to manage separation distances between liquor stores, and between liquor stores and parks, Administration conducted a survey on these options in July, 2018. The results are listed below in the *Insight Mixed Topic Survey and Open Link Survey* section towards the end of this attachment.

Of the six options presented, approximately 46 percent of Insight Community Members selected option one, no change to the current liquor store separation distances; 54 percent of the participants selected options that related to varying degrees of change to the current regulations. Of the 54 percent, respondents were heavily split on how to change the regulations. The options most favoured are to provide exemptions in major destinations (19.9 percent), followed by matching the separation distances required between Cannabis Retail Sales stores (12.5 percent), eliminating the separation distance between liquor store (10.1 percent), and eliminating all zoning regulations for liquor stores (9.8 percent). There was little support for matching the 100 metre separation distance required between liquor stores and parks, schools and community recreation services (1.9 percent).

In asking participants whether or not the separation distance required between liquor stores and parks should be reduced from 100 metres, the results indicated a strong desire to maintain the current separation distance requirement.

### **Internal Stakeholder Meeting Summary**

Administration held stakeholder meetings in April and May with internal and external stakeholders with representatives from:

- Development Services Branch - Development Approvals
- Development Services Branch - Development Compliance
- Development Services Branch - Business Licencing
- Community Standards - Enforcement
- Citizen Services - Community Safety
- City Planning - Planning Coordination
- Edmonton Police Service (EPS)
- Alberta Gaming and Liquor Commission (AGLC)
- Alberta Health Services - Addiction and Mental Health

### **Impacts Associated with Liquor Stores**

During discussions with the internal stakeholder group about the impacts associated with liquor stores, the following was identified:

- some operators target vulnerable individuals with predatory sales,
- some operators over-serve intoxicated individuals,
- the impacts are different downtown, as it has a greater population of vulnerable individuals and social service/shelter providers

- off-sales (liquor sold for off-premise consumption from bars, restaurants, hotels etc.) tends to occur more in the core, resulting in more complaints
- there is an increase in service calls to EPS as the distance between stores is reduced
- that the increase in number of liquor stores increases exposure to youth
- parking/traffic issues
- there is a decrease in health outcomes with increase in availability of alcohol through liquor stores
- safety issues, due to lack of compliance with crime prevention design regulations
- aesthetic impacts related to unattractive and unsafe storefronts that bring down the appearance of the street
- there is a lack of market incentives under current regulatory framework - bad operators do not face competition
- the proximity to bars needs to be considered - intoxicated individuals leaving bars may go to liquor stores to purchase more alcohol
- concern of binge drinking and the proximity of liquor stores to universities
- market demands and liquor stores competing for customers, leading to lower prices

### Suggestions to Manage the Impacts

The following are ways that it was identified that the zoning bylaw can change to manage impacts associated with liquor stores:

- look to downtown as a whole, not just one district
- take a consistent approach across the city that is fair and equitable, and does not privilege one corporate entity over another
- create clear and simple regulations
- link separation distance to density, downtown, workers, and tourists
- reduce separation restrictions Downtown, Oliver, and Old Strathcona
- enhance crime prevention and design regulations for liquor stores
- restrict signage related to advertising to limit exposure and enhance appearance
- regulate liquor stores more tightly through business licensing and consider requiring control plans
- reduce hours of operation for all liquor stores
- require specific training for operators and educate them on practices that positively impact the surrounding community
- take a wellness approach
- develop a 'Best Bar None' program for liquor stores to reward good operators
- develop a municipal alcohol policy plan, in relation to Alberta Health Services - Alberta Municipal Alcohol Policy Project (AMAPP)

**Business Improvement Area Representatives Stakeholder Summary**

Administration invited all Business Improvement Areas the opportunity to meet and discuss impacts associated with liquor stores. Between April 30th to May 2nd, 2018, Administration met with seven Executive Directors from Business Improvement Area Associations in Edmonton to discuss the impacts associated with liquor stores and what options exist to manage the impacts. Areas of discussion included:

- identifying the problematic and desirable characteristics of liquor store operators,
- challenges in working with problem operators and the perceived limited effectiveness Alberta Gaming and Liquor Commission (AGLC),
- challenges with the current separation distance requirements,
- discussion on Zoning Bylaw regulations, best practices and other solutions that could manage impacts associated with liquor stores.

In consideration of the impacts of liquor stores there was consensus that the operators of liquor stores greatly influence the impacts associated with their establishments. For liquor stores that were seen as having minimal impacts to the surrounding areas were characterized as being:

- well managed,
- having limited hours of operation (closed well before 2 am), and
- some having a specialized product selection.

During discussions, two Business Improvement Area representatives highlighted a liquor store in their area that has contributed positively to their community through the appearance and management of the stores. Both stores were also characterized as carrying a specialized product selection of wine. For one of the stores it was identified that the current liquor store improved the image of the storefront in taking over a previously run-down liquor store and renovating the exterior of the building.

Perspectives of liquor stores that negatively impacted the community were characterized as being:

- not well managed,
- having an untidy and unsightly appearance,
- having bars and/or posters in the window that blocked sightlines into and out of the establishments, and
- having poor business practices such as targeting vulnerable populations through cheap and/or high alcohol content single serve products, or serving intoxicated customers.

It was noted that the quality of the business attracted certain types of customers, and in some cases operators will over-serve customers to meet their bottom line.

### Challenges with Operators and AGLC

Some of the Business Improvement Area representatives noted the low barriers to enter the liquor store market, and that liquor stores are attractive for entry level entrepreneurs. This discussion emphasized the need for:

- better education of AGLC's operational requirements,
- more proactive enforcement of the provincial regulations

One representative indicated that they have connected with the Alberta Liquor Store Association (ALSA) about problem operators. It was also noted that ALSA has a newsletter that is provided in multiple languages, and was suggested that this newsletter could be used to help facilitate awareness of the regulations and good business practices.

To address problem operators, some representatives indicated that they have:

- worked with landlords and built relationships with liquor stores in their areas
- worked with landlords to find new tenants
- communities that strongly advocate for no additional liquor stores in their neighbourhood.

### Suggestions to change the Zoning Bylaw

Some of the ways the executive directors felt that the impacts could be managed include:

- Enhancing the appearance of liquor stores through design regulations to create an attractive storefront that promotes safety.
- Developing an area based approach, by expanding opportunities in areas with high populations, like the downtown, and protect problem areas that require more control.
- Taking a precautionary approach to reducing separation distance requirements, by allowing destination liquor stores with limited floor areas.
- Limitations on hours of operations through engagement with liquor stores
- Using best practices used by other jurisdictions.

### Liquor Store Workshop Summary

On May 8, 2018, City staff held an industry and community workshop on the impacts associated with liquor stores, identification of how Zoning Bylaw 12800 could manage the impacts, and best practices or other solutions to manage the impacts. Those in attendance included:

- Liquor store owners and operators
- Alberta Liquor Store Association representatives
- Community and real estate developers
- Residents

- Planning Consultants
- School board representatives

#### Impacts of Liquor Stores

- Measurable impacts to inform policy
- In association with liquor store density
  - less staff and security due to lower profits
  - increased crime
- Public Health: addiction, family abuse
- Impacts to vulnerable individuals - targeted sales
- Minimal impacts to schools with 100 metre buffer
- Traffic dependent on context and consideration of City policies for livable/walkable development

In discussion of the impacts associated with liquor stores, stakeholders questioned and expressed concern whether or not there were problems with the current regulations. Stakeholders expressed a need for metrics and data to support further changes and the need to identify indicators that are being monitored, such as crime, real estate devaluation, and underage drinking. Some stakeholders noted that increased crime has the potential to create unsafe conditions for citizens and increase demand on police resources. Stakeholders also noted that the general negative impacts on communities existed because of “access and demographics attracts those on margins of society” and that more stores result in:

- more crime
- more competition, leading to discounted rates and greater over consumption; and
- more competition leading to lower profit margins, resulting in less staff with less security around liquor stores.

Other impacts identified included health impacts in regards to addiction and family abuse; panhandling, and theft. Stakeholders noted that alcohol is involved in most of the crime and trouble areas should maintain the 500 m separation distances. School board representatives noted support for the current 100 metre buffer from schools and parks, and that as a result of this regulation the school boards do not have any major issues or negative impacts from liquor stores. Stakeholders also noted support for livable and walkable development, in areas like the downtown, and the different modes of transportation in contrast to suburban areas where people drive to liquors stores. Participants emphasized the importance of certainty for businesses and developers and noted that the zoning regulations for liquor stores has changed three times in 10 years.

Suggestions to Change the Zoning Bylaw

- Develop simple/clear regulations to provide certainty and equity that result in less appeals to the Subdivision and Development Appeal Board
- Base land use and location criteria on context and business model
- Expand opportunities for liquor stores in the downtown core - potentially through a lottery system
- Eliminate the 500 metre separation distance requirement so all stores are subject to the same rules
- Maintain the 500 metre separation distance requirement and provide flexibility that considers hours of operation and product variety
- Allow stores to relocate within their buffer area and to expand
- Focus and improve regulations on crime prevention through environmental design regulations or policing issues
- Differentiate the criteria for a Major Alcohol Sales store from a Minor Alcohol Sales store beyond floor area
- Eliminate the perception that some liquor stores can change the rules
- Let the province regulate the number of liquor stores

Best Practices and Other Solutions

- Increase funding for social programs and public education on responsible consumption
- Base location and land use criteria on context, demographics, hours of operation, and product variety
- Increase enforcement of AGLC rules and regulations for operators
- Create a liquor store community watch program
- Increase prices for liquor products (high alcohol content single serves) to minimize predatory sales
- Implement best practices from other jurisdictions
- Continue review of Zoning Bylaw regulations as needed
- Maintain 100 metre buffer from schools and parks
- Align municipal regulations with provincial legislation.

**Conversations with Service Providers and Shelters**

In June, Administration had telephone conversations with representatives with Hope Mission and the Bissell Centre, and met with a representative with Boyle Street Community Services regarding the impacts associated with liquor stores. In consideration of potentially reducing the separation distances required between stores, Administration asked each representative whether there should be a buffer between liquor stores service providers that work with vulnerable populations.

Although in general stakeholders were supportive of a buffer between liquor stores and service providers, it was identified:

- Regardless of the distance between liquor stores and service providers, individuals will continue to travel to access alcohol.
- There is not a lack of access to liquor stores and concern that more liquor stores in the downtown will attract panhandling and other issues.
- Operators need to be more responsible and not serve intoxicated customers.
- Concern of operators who change their business practices to predatory sales with cheap single-serve type products during times of the month when people get paid
- There should be a buffer of at least one block, if not more, between liquor stores and service providers.
- Increasing trends of people consuming non-traditional forms of alcohol (hand sanitizer and mouthwash) and impacts on the community.

### **Insight Mixed Topic Survey and Open Link Survey**

To gather input on the options identified in Attachment 6 - Options to Manage Separation Distances for Liquor Stores, Administration conducted a survey on the proposed options through both the Insight Community mixed topic survey, which ran from July 10th to July 17th; and an open link survey for the general public, which ran from July 10th to July 23rd.

To build awareness of the survey, Administration advertised the survey through social media and a link to the survey was included in the Building Edmonton newsletter, the EFCL newsletter, as well as the project website. Stakeholders were also notified of the survey when the draft report was circulated for review and comment. A total of 2371 individuals participated in the Insight Mixed Topic survey, and 402 individuals participated in the open link survey.

In both surveys a plurality of respondents selected Option 1 - Remain the Same as their preferred outcome. 45 percent of respondents to the Insight Survey selected this option and 44 percent of respondents to the Open Link Survey.

Slightly more than half of the survey participants of both surveys indicated various degrees of support for changes to the current separation distances required between liquor stores. Of the participants that indicated support for change, there was a greater level of support for Option 2, to provide exemptions for major shopping and tourist areas, with higher levels of support for the Downtown, Old Strathcona, and West Edmonton Mall. This was followed by slightly less support to match the separation distances required between Cannabis Retail Sales stores, which is 200 metres.

In asking participants whether they thought the separation distances between liquor stores and parks should be reduced from its current requirement of 100



metres, the majority of respondents indicated a desire to either maintain this separation distance or increase this distance. Of the participants that indicated support to change this requirement, most indicated support to eliminate the separation distance requirement between parks and liquor stores, or only if the park does not have a playground.

Further information on the questions and associated results are listed below.

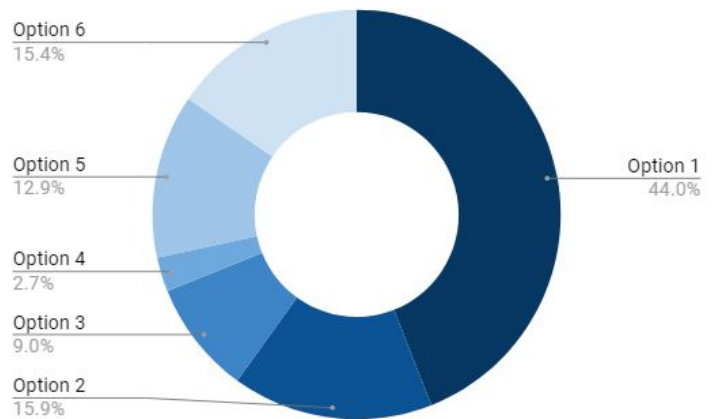
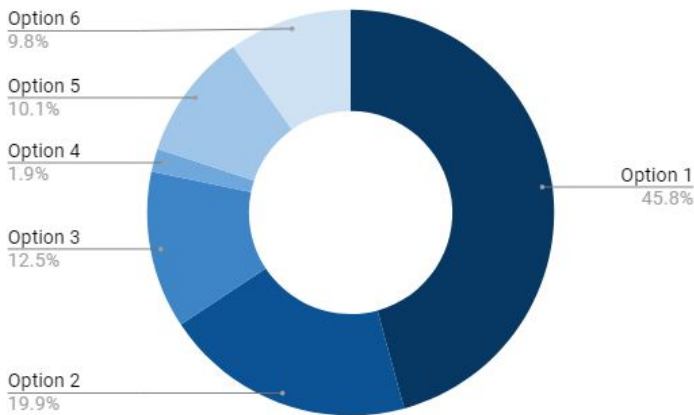
**Question 1**

Should the separation distance requirements between liquor stores change or remain the same?

- Option 1:** Remain the same - keep the separation distances as it is (500 m in mature areas)
- Option 2:** Change, provide exemptions to the separation distance requirements in major shopping and tourist destination areas with a high density of workers and residents (in areas like the Downtown, Old Strathcona, West Edmonton Mall).
- Option 3:** Change, make it the same distance as required between Cannabis Retail Sales stores (200 m)
- Option 4:** Change, make it the same distance as required from Parks, Schools, and Community Recreation Services (100 m)
- Option 5:** Change, eliminate the separation distance required between liquor stores (0 m) but keep the separation from schools and parks.
- Option 6:** Change, eliminate all Zoning Bylaw regulations for liquor stores and treat them as General Retail Stores. This includes all separation between stores, schools, and parks.

**Insight Survey Results (2371 participants)**

**Open Link Survey Results (402 participants)**

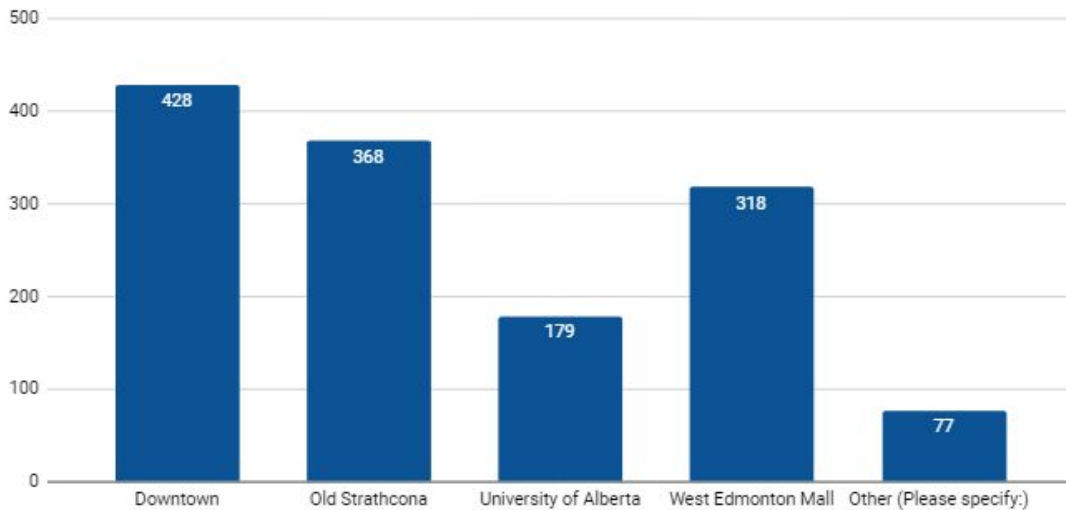


Based on the responses provided, participants who selected 'Option 2,' which included 537 participants in total, were directed to the following two questions:

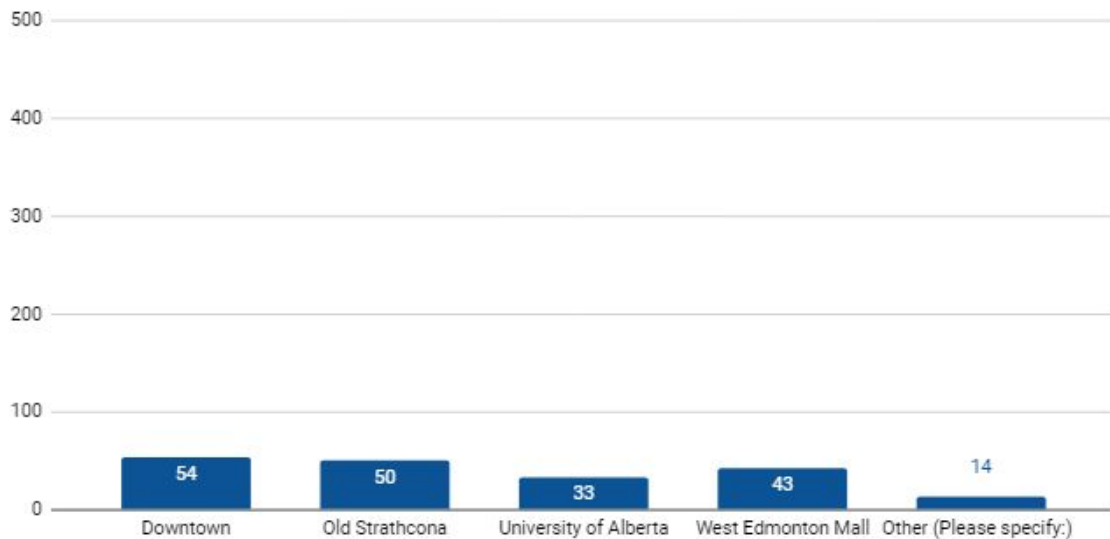
**Question 1a**

You selected exemptions for major shopping and tourist destinations with a high density of workers and residents. Which areas would you support exemptions from the separation distance requirement between liquor stores?

**Insight Survey Results (473 participants)**

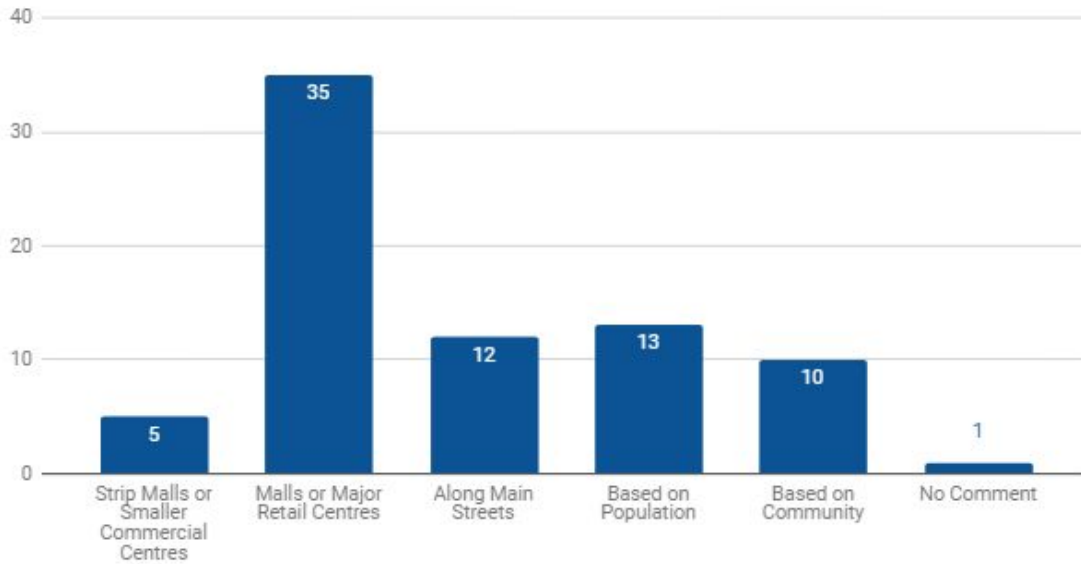


**Open Link Survey Results (64 participants)**

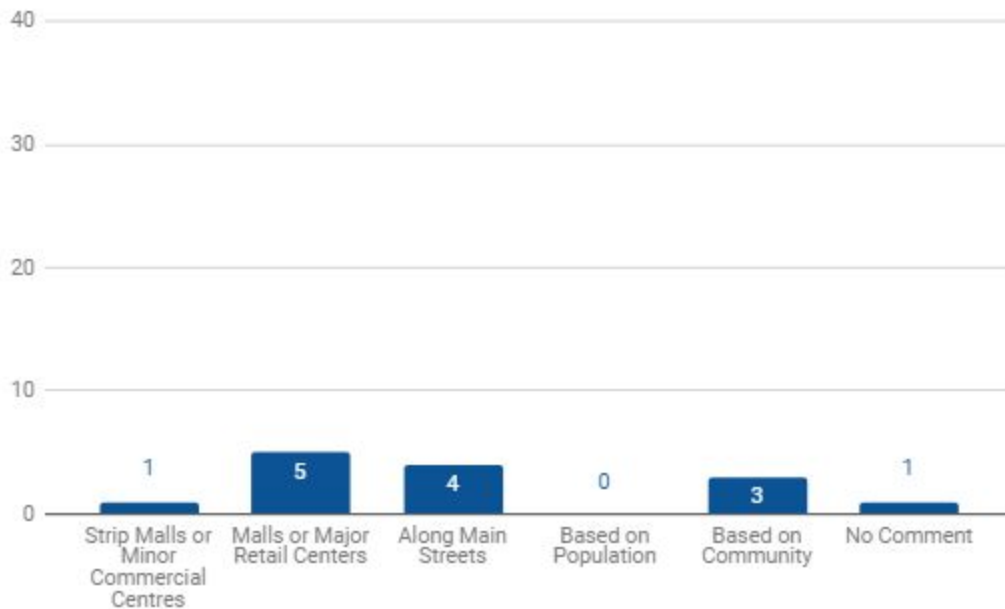


Of the 91 participants that indicated 'Other,' the following themes emerged in responses as to where the exemptions should be allowed or be dependent on:

**Insight Survey Results (77 participants)**



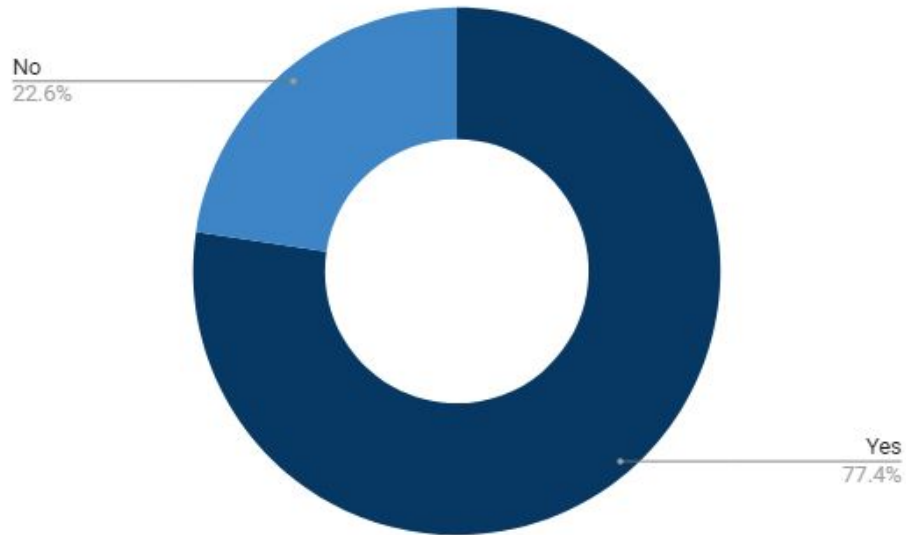
**Open Link Survey Results (14 participants)**



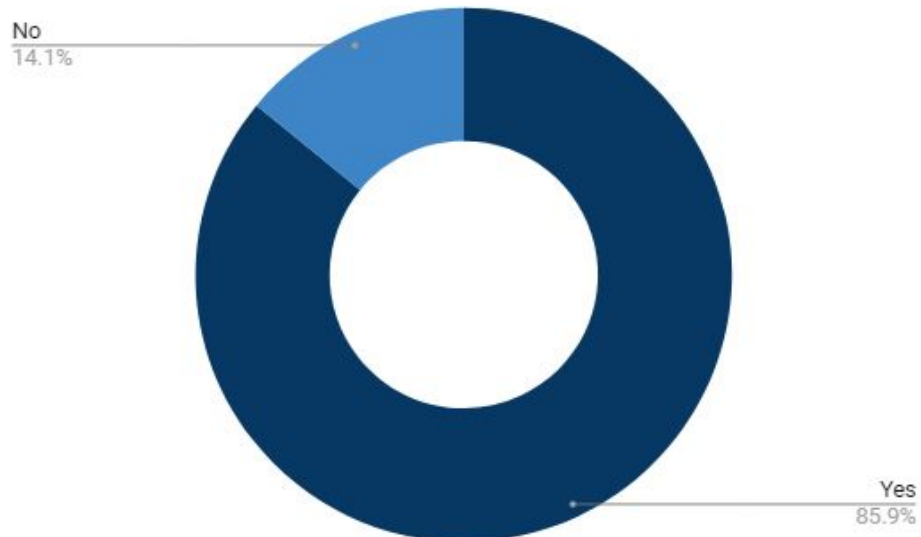
**Question Q1b**

In these areas, should there be a separation distance between liquor stores and emergency shelters and community service providers that assist vulnerable populations?

**Insight Survey Results (473 participants)**



**Open Link Survey Results (64 participants)**



In consideration of possible options to change the separation distances between liquor stores and parks, the participants were asked the following questions.

**Question 2**

Currently the separation distance required between liquor stores and parks is 100 metres. Should the separation distance between liquor stores and parks be reduced?

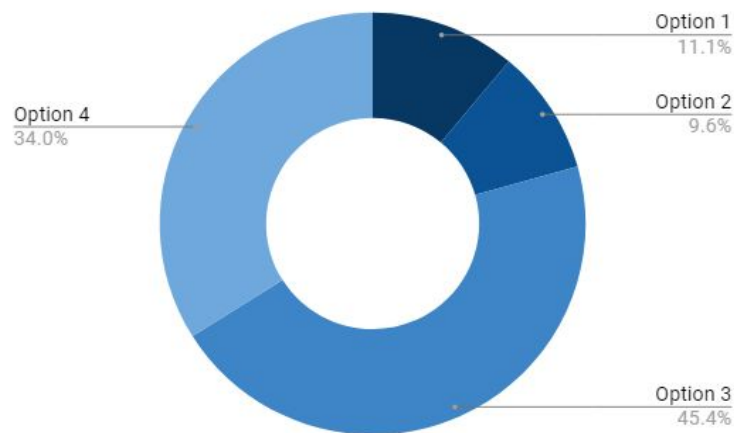
**Option 1:** Yes

**Option 2:** It depends

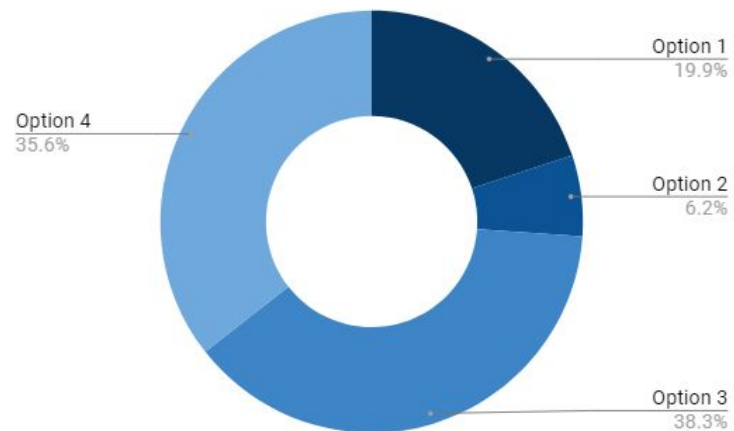
**Option 3:** No, keep the separation distances the same

**Option 4:** No, increase the separation distances

**Insight Survey Results (2371 participants)**



**Open Link Survey Results (402 participants)**



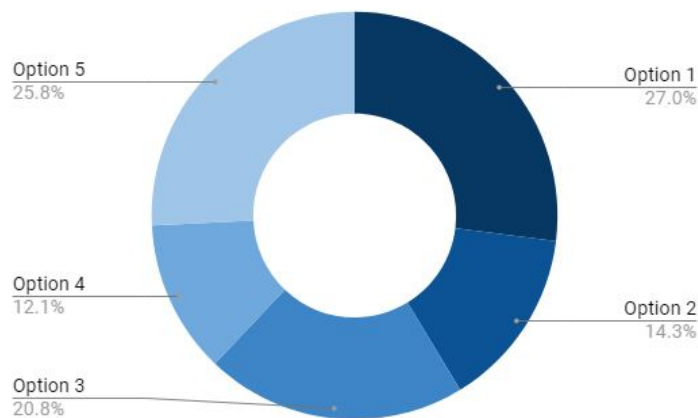
Based on the responses provided, participants who selected 'Option 2,' which included 594 participants in total, were directed to the following two questions:

**Question 2a**

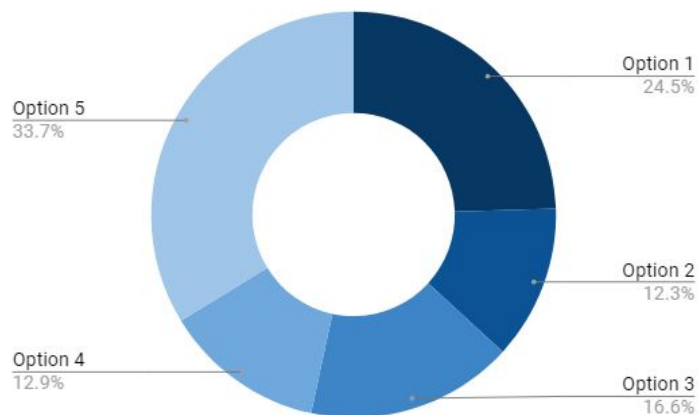
A reduction to the distance required between liquor stores and parks should only be allowed if the park:

- Option 1:** Does not have playground equipment
- Option 2:** Is under a certain size, such as 3000 m<sup>2</sup> (For example, Beaver Hills House Park - approx. 4,500m<sup>2</sup> and Alex Decoteau Park - approx. 3,500m<sup>2</sup>)
- Option 3:** Consists only of green space primarily for the purpose of multi-use trails (paths for pedestrians and cyclists)
- Option 4:** Is along the river valley edge (further away from the river)
- Option 5:** Other (please specify)

**Insight Survey Results (489 participants)**

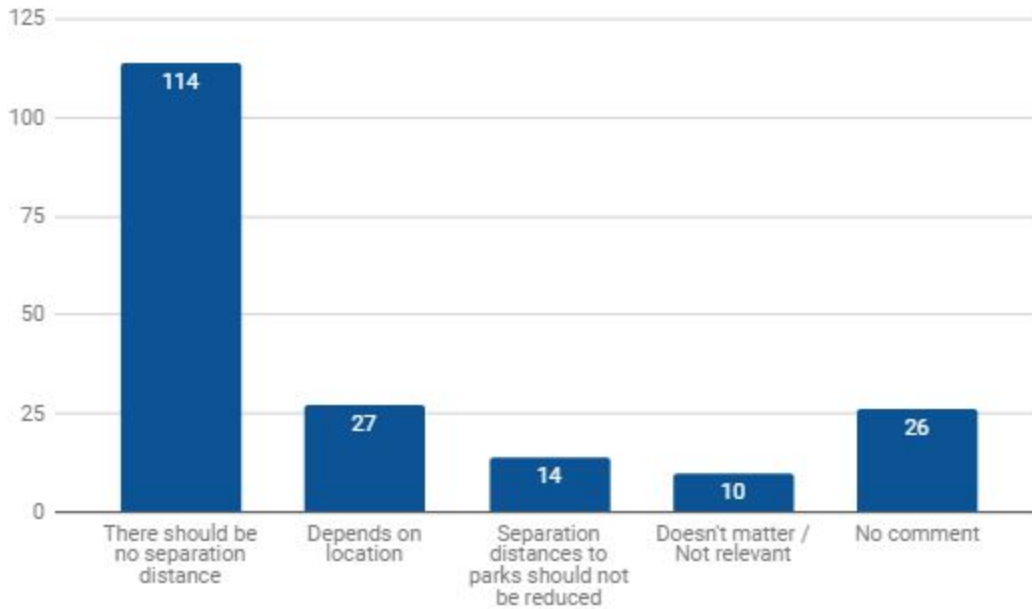


**Open Link Survey Results (105 participants)**

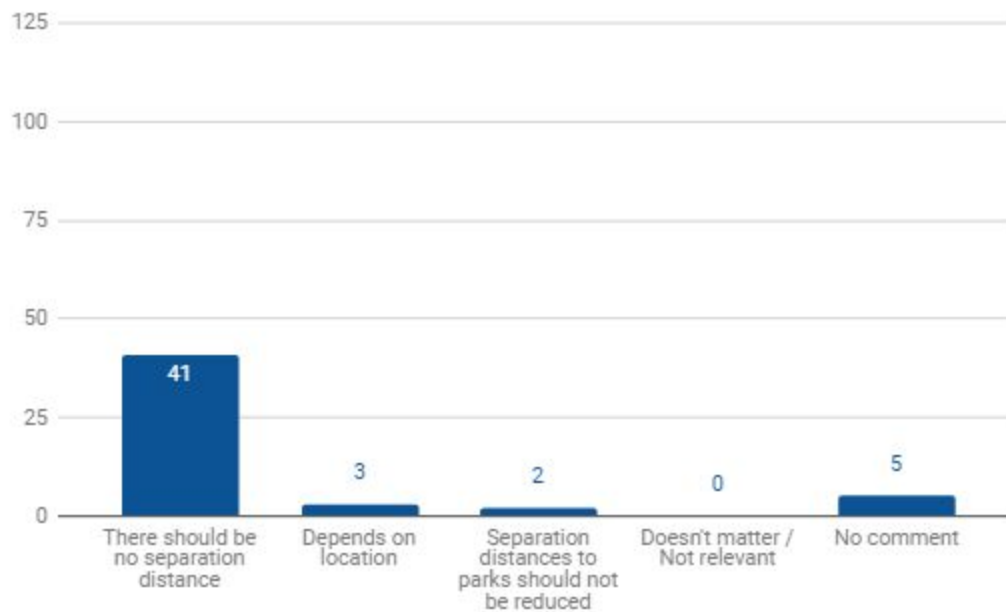


Of the 246 participants that indicated 'Other,' the following themes emerged in the responses as to what the exemptions should be dependent on:

### Insight Survey Results



### Open Link Survey Results



**Question Q2b**

What should the distance between parks and liquor stores be?

**Option 1:** 50 metres

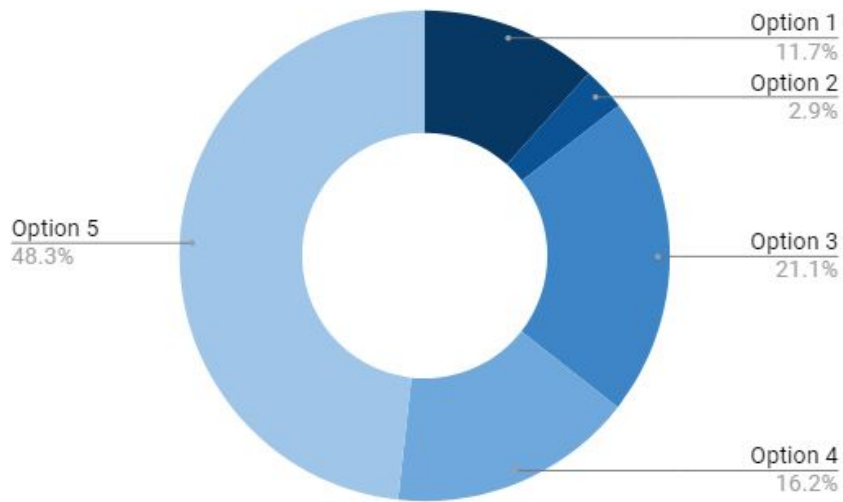
**Option 2:** 25 metres

**Option 3:** Separated by another parcel or a roadway or lane (not adjacent to a park)

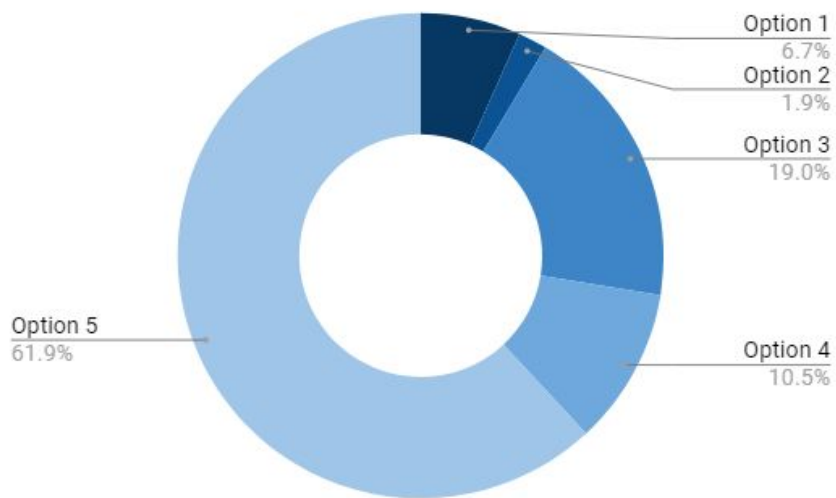
**Option 4:** Separated by a roadway or lane and storefront does not face the park

**Option 5:** No separation (0 metres)

**Insight Survey Results (489 participants)**



**Open Link Survey Results (105 participants)**





**Report Circulation Feedback (comments received)**

A draft of this report was sent to the following organizations for review and comment:

- Edmonton Federation of Community Leagues
- All Community Leagues
- Business Improvement Area Associations
- Three local community service/shelter providers
- Liquor store industry stakeholders
- Alberta Liquor Store Association
- Alberta Gaming and Liquor Commission
- Alberta Health Services
- Edmonton Police Service
- Urban Development Institute
- National Association for Industrial and Office Parks (NAIOP) Commercial Real Estate Development Association
- Edmonton School Boards

A summary of the comments received is listed below:

- West Jasper/Sherwood Community League and Belvedere Community League indicated a preference to maintain the 500 metre separation distance. One league noted the impact of liquor stores in their area contributing to an unsafe environment, discouraging residents from walking or shopping in the area, and making rehabilitation difficult for those suffering from addictions. The other community league indicated their position that reducing separation distances provides no benefit to residential areas and the communities of Edmonton.
- The Downtown Edmonton Community League indicated a preference to match the 200 metre separation distance required for cannabis sales, and maintain the 100 metre separation distances to parks.
- Three liquor store operators indicated preference to maintain the current separation distances and noted the need for stronger enforcement of operations by AGLC.
- One liquor store operator indicated support to remove the 500 metre separation distance and to maintain the current 100 metre separation distance from parks and schools, noting the change would increase market competitiveness providing employment opportunities and better retail choices for Edmontonians.
- The 124 Street Business Association indicated support to remove the separation distances for liquor stores.
- NAIOP indicated support to eliminate the separation distance between liquor stores and maintaining the separation from parks and schools, noting the existing regulations have been overly restricted, reducing competition, and making leasing in Edmonton more difficult in both mature and sub-urban areas.

- An independent planning consultant noted the need for better tools, other than land use regulation, to mitigate the social issues associated with alcohol consumption.
- Edmonton Public Schools indicated support to align separation distances for alcohol sales with those for cannabis retail stores, noting that the alignment would reduce complexities involved in planning for school sites in planned neighbourhoods.
- The Alberta Liquor Store Association indicated preference to maintain the current separation distance, but would support Option 2, if it includes a provision for a minimum of 250 – 300 metre buffer from emergency shelters and community service providers who work with vulnerable populations.
- Alberta Health Services strongly recommends maintaining the 500 metre separation distance, noting that reducing alcohol availability is one of the most effective ways to reduce consumption and harms associated with alcohol, and that research indicates the use of land-use bylaws is one of the best tools at the municipal level to address alcohol availability. Other policy options noted to be considered included reducing the hours of operation for off premise (liquor stores) and on premise (bars and clubs) alcohol establishments.