

Kadaltilla

Adelaide Park Lands Authority



BOARD MEETING AGENDA

Wednesday, 30 April 2025 at 4.30 pm
Colonel Light Room, Adelaide Town Hall

Kadaltilla / Adelaide Park Lands Authority

Board Meeting Agenda, Wednesday, 30 April 2025 at 4.30 pm
Colonel Light Room, Adelaide Town Hall

Membership	The Lord Mayor 4 other members appointed by the Council 5 members appointed by the Minister for Planning
Quorum	6
Presiding Member	The Right Honourable the Lord Mayor, Dr Jane Lomax-Smith
Deputy Presiding Member	Elinor Walker
Board Members	Allison Bretones Ashley Halliday Justyna Jochym Stephanie Johnston Mitzi Nam Councillor Keiran Snape Warwick Keates Kirsty Bevan
Proxy Board Members	Sarah Russo, for Stephanie Johnston Councillor Henry Davis, for Councillor Keiran Snape Dennis Rigney, for Mitzi Nam

Agenda

1. Welcome and Opening

1.1 Acknowledgement of Country

At the opening of the Board Meeting, the Board member presiding will state:

‘Kadaltilla / Adelaide Park Lands Authority acknowledges that we are meeting on traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past and present. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

And we also extend that respect to other Aboriginal Language Groups and other First Nations who are present today.’

1.2 Apologies

Nil

1.3 Confirmation of Minutes

That the Minutes of the meeting of the Board of Kadaltilla / Adelaide Park Lands Authority held on 27 March 2025 be taken as read and be confirmed as an accurate record of proceedings.

2. Conflict of Interest

3. Presiding Member Report (verbal)

4. Deputations

Nil

5. Items for Board Discussion

6. Items for Board Decision

6.1	Expiry of Deed of Agreement - Royal Show Park Lands Parking	11 - 29
6.2	Park Lands Leasing – Expressions of Interest: King Rodney Park / Ityamai-itpina (Park 15) and Carriageway Park / Tuthangga (Park 17)	30 - 71
6.3	Adelaide Park Lands Dry Area Regulations Review	72 - 146

7. Items for Noting

8. Other Business

9. Meeting Close

Kadaltilla

Adelaide Park Lands Authority



BOARD MEETING MINUTES

Thursday, 27 March 2025

Colonel Light Room, Adelaide Town Hall

Kadaltilla / Adelaide Park Lands Authority

Board Meeting Minutes, Thursday, 27 March 2025, at 4.30 pm
Colonel Light Room, Adelaide Town Hall

Present:

Deputy Presiding Member

Elinor Walker

Board Members

Allison Bretones

Justyna Jochym

Stephanie Johnston

Dennis Rigney (for Mitzi Nam)

Councillor Keiran Snape

Craig Wilkins

Ben Willsmore

1 Welcome and Opening

1.1 Acknowledgement of Country

At the opening of the Board Meeting, the Deputy Presiding Member, Elinor Walker stated:

‘Kadaltilla / Adelaide Park Lands Authority acknowledges that we are meeting on traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past and present. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

And we also extend that respect to other Aboriginal Language Groups and other First Nations who are present today.’

1.2 Apologies

Presiding Member - The Right Honourable the Lord Mayor Dr Jane Lomax-Smith,
Board Members - Ashley Halliday
Mitzi Nam

1.3 Confirmation of Minutes

Moved by Allison Bretones,
Seconded by Craig Wilkins -

That the Minutes of the meeting of the Board of Kadaltilla / Adelaide Park Lands Authority held on 27 February 2025 be taken as read and be confirmed as an accurate record of proceedings.

Carried

2 Conflict of Interest

Nil

3 Presiding Member Report (verbal)

The Deputy Presiding Member, Elinor Walker provided a verbal report in relation to:

CoA Cultural Policy Discussion Paper:

- On 13 March 2025, Kadaltilla’s feedback on the Cultural Policy Discussion Paper was submitted to the City of Adelaide. Thank you for your support in approving this feedback outside of the session.

Greater Adelaide Regional Plan:

- On 17 March 2025, the Hon Nick Champion MP, wrote to Kadaltilla and announced the release of the final Greater Adelaide Regional Plan.
- A briefing to the Board has been requested, and we will provide further updates as details are confirmed.

Urban Greening Strategy:

- On 20 March 2025, the State Government released its Urban Greening Strategy, which includes a plan to grow tree canopy and give \$1.5 million to council greening projects. The strategy sets a goal of reaching 30 per cent tree canopy cover by 2055.

E-News Shared with Board Members:

- Lot Fourteen: Path Network Realignment
 - Renewal SA advised of changes to the path network at Lot Fourteen.
 - Refer to the E-News distributed on 20 March 2025 through the Kadaltilla portal for further details.

Kadaltilla Membership:

- As you are aware the Minister has had to consider the State Government's nominations to the Board as their terms end on 31 March 2025.
- I'm pleased to share that the Minister has provided his nominees to the Lord Mayor in her capacity as Presiding Member and I am happy to announce the following:
 - The Minister has supported the continuation of the following members:
 - Ashleigh Halliday, congratulations on being recognised with an additional term.
 - I have been asked to stay on and retain the role of Deputy Presiding Member, which I accepted and will roll on for a further term.
 - The continuing membership of Stephanie Johnston.
 - The Minister has nominated the new members who will join the Kadaltilla Board in April and attend their first meeting, our next meeting on Wednesday 30 April 2025, we welcome and congratulate:
 - Warwick Keates is a landscape architect and the Director of Wax Designs.
 - Kirsty Bevan is the Chief Executive Officer of the Conservation Council SA.
 - Sarah Russo (the new Deputy Member to Stephanie Johnston) was nominated by the Adelaide Park Lands Association and is the Executive Manager of Partner Engagement for New Developments at NBNCo.
- I'd like to acknowledge the thanks passed on by the Lord Mayor at our last meeting and thank you again, Craig and Ben, for your dedication to Kadaltilla in this your final Board meeting. Your contributions to the Kadaltilla Board have been greatly valued, and your dedication has played a key role in advancing Adelaide's Park Lands initiatives.

4 Deputations

Nil

9 Exclusion of the Public for Items requested to be considered in confidence

10 Item 9 - Order to Exclude for Item 10.1

Moved by Stephanie Johnston,
Seconded by Ben Willsmore -

THAT THE ADELAIDE PARK LANDS AUTHORITY

1. Having taken into account the relevant considerations contained in Clause 4.8.21 of the Adelaide Park Lands Authority Charter and section 90(3) (j) and 90(2) & (7) of the *Local Government Act 1999* (SA), this meeting of the Board of Kadaltilla / Park Lands Authority dated 27 March 2025 resolves that it is necessary and appropriate to act in a meeting closed to the public as the consideration of Item 10.1 [Statue Commemorating South Australian Aboriginal Leaders Proposal] listed on the Agenda in a meeting open to the public would on balance be contrary to the public

interest.

Grounds and Basis

This Item contains material provided on a confidential basis which the State Government has requested be considered in confidence on the grounds that the details of the request are sensitive in nature and the release of this information prematurely may be misleading. The disclosure of information in this report could reasonably be expected to prejudice the position and any negotiations between the City of Adelaide and the State Government.

Public Interest

The Kadaltilla / Adelaide Park Lands Authority is satisfied that the principle that the meeting be conducted in a place open to the public has been outweighed in the circumstances because the disclosure of information may result in release of information prior to the finalisation of the matter by the State Government and the City of Adelaide. The disclosure of this information may materially and adversely affect the viability of the matter and prejudice the ability of the parties to discuss/participate or influence a proposal for the benefit of the State Government, the City of Adelaide and the community in this matter which on balance would be contrary to the public interest.

2. Pursuant to section 90(2) of the *Local Government Act 1999 (SA)* (the Act), this meeting of Kadaltilla dated 27 March 2025 orders that the public (with the exception of members of Corporation staff and any person permitted to remain) be excluded from this meeting to enable this meeting to receive, discuss or consider in confidence Item 10.1 listed in the Agenda, on the grounds that such item of business, contains information and matters of a kind referred to in section 90(3) of the Act.

Carried

There were no members of the public nor Corporation of the City of Adelaide staff not involved with Item 10.1 present to leave the Colonel Light Room at 4.38pm.

10 **Items for the Board in confidence**

10.1 **Item 10.1 - Statues Commemorating South Australian Aboriginal Leaders Proposal [S90(3) (j)]**

The meeting re-opened to the public at 5.06pm.

Confidentiality Order

Item 10.1 – Statues Commemorating South Australian Aboriginal Leaders Proposal [90(3) (j)]

Authorises that, in accordance with Section 91(7) and (9) of the *Local Government Act 1999 (SA)* and because Item 10.1 [Statues Commemorating South Australian Aboriginal Leaders Proposal] listed on the Agenda for the meeting of the Board of Kadaltilla / Adelaide Park Lands Authority held on 27 March 2025 in confidence pursuant to Section 4.8.21 of the *Kadaltilla Charter* and s 90 (3) (j) of the *Local Government Act 1999 (SA)*, orders that:

1. The Resolution, the report, the discussion and any other associated information submitted to this meeting of the Board and the Minutes of this meeting in relation to the matter remain confidential and not available for public inspection until 31 December 2026.
2. The confidentiality of the matter be reviewed in December 2025.
3. The Chief Executive Officer be delegated the authority to review and revoke all or part of the order herein and directed to present a report containing the Item for which the confidentiality order has been revoked.

5 Items for Board Discussion

Nil

6 Items for Board Decision

Nil

7 Items for Noting

7.1 Update on the World Heritage Listing for the Adelaide and its Rural Settlement Landscapes - Standing Item

Discussion ensued

It was then –

Moved by Stephanie Johnston,
Seconded by Councillor Keiran Snape -

THAT THE KADALTILLA / ADELAIDE PARK LANDS AUTHORITY ADVISES COUNCIL

That the Kadaltilla / Adelaide Park Lands Authority:

1. Receives and notes the report contained in Item 7.1 on the Agenda for the meeting of the Board of Kadaltilla / Adelaide Park Lands Authority held on Thursday, 27 March 2025.

Carried

Item 7.1 - Action Arising - Budget Allocation for World Heritage Listing for the Adelaide and its Rural Settlement Landscapes

In response to a query from Councillor Keiran Snape, the Director City Shaping, Ilia Houridis gave an undertaking to provide Board Members with:

- a breakdown of 2024/2025 budget spent and precis of progress/achievement to date; and
- details of the budget bid that the City of Adelaide will consider for the project for 2025/2026 and a precis of positive steps and achievement sought.

8 Other Business

Item 8 - Other Business - Action Arising - Commercial Signage on Fencing in the Park Lands

In response to a query from Councillor Keiran Snape, the Director, City Shaping Ilia Houridis gave an undertaking to follow up on a concern that commercial signage was to be placed on fencing around the Adelaide Comets pitch.

Item 8 - Other Business - Acknowledgement and Expression of Appreciation to Ben Willsmore and Craig Wilkins

Moved by Councillor Keiran Snape,
Seconded by Stephanie Johnston -

That Kadaltilla / Adelaide Park Lands Authority acknowledges and expresses appreciation to Ben Willsmore and Craig Wilkins for their contribution to the Board and extends best wishes to both for all the best for the future.

Carried

Discussion ensued during which Ben Willsmore and Craig Wilkins thanked Board members and the Administration, commented on their Board involvement and wished the Board all the best as it continues to provide advice for the protection, management, enhancement and promotion of the Adelaide Park Lands.

Closure

The meeting closed at 5.18 pm

Elinor Walker

Deputy Presiding Member
Kadaltilla / Adelaide Park Lands Authority

Documents Attached:

Ni



Adelaide Park Lands Authority

Expiry of Deed of Agreement - Royal Show Park Lands Parking

**Wednesday, 30 April 2025
Board Meeting**

Author: Mike Philippou
Associate Director Strategic
Property & Commercial

Public

Purpose

The purpose of this report is to provide background and information to enable the Board to provide advice to Council relating to a request from the Royal Agricultural and Horticultural Society to extend the current Deed for the Royal Show Park Land Parking.

The City of Adelaide has supported the Royal Adelaide Show (the Show) through the provision of Park Land parking since 1926.

The City of Adelaide and the Royal Agricultural and Horticultural Society (the Society) entered into a Deed of Agreement (the Deed) in 2011 which formalised the current arrangement to provide Park Land parking for the Royal Adelaide Show (the Show). Parking is provided in Golden Wattle Park/Mirnu Wirra (Park 21W), Josie Agius Park/Wikaparntu Wirra (Park 22) and GS Kingston Park /Wirrarninthe (Park 23) for the duration of the Show (see map of parking locations ([Link 1](#))).

The Society has requested that the City of Adelaide provide continued support for the Show through the provision of Park Land parking post 2026 when the current Deed expires.

The Society presented at a confidential CEO Briefing on 25 February 2025 and has now formalised their request in writing dated 27 March 2025 ([Link 2](#)) for continued support from the City of Adelaide for the Show through the provision of Park Land parking post 2026.

It is proposed that a new Deed be entered into that will reflect the aspirations of the current Deed to reduce and eventually remove Park Land parking for the Royal Adelaide show and protect the Park Lands.

In addition, a new Deed would reflect same or similar terms as the existing Deed, with changes to mitigate the risk to Council, as detailed in section 16 of this report.

Recommendation

THAT THE KADALTILLA / ADELAIDE PARK LANDS AUTHORITY ADVISES COUNCIL:

That the Kadaltilla / Adelaide Park Lands Authority:

1. Notes the current Royal Adelaide Show Parking – Executed Deed of Agreement – **Attachment A**.
 2. Endorses Council progressing with negotiations and execution of a Deed of Agreement to be based on the same, or similar terms, to that of the existing Deed and the key terms included in section 16 of this report.
-

Implications

Adelaide Park Lands Management Strategy 2015-2025	Adelaide Park Lands Management Strategy 2015-2025 The Council endorsed Adelaide Park Lands Management Strategy – Towards 2036 states as part of Precinct Considerations: Manage car parking for the Royal Adelaide Show according to the Deed of Agreement with the Royal Agricultural and Horticultural Society of SA.
2023-2028 Strategic Plan	Kadaltilla / Adelaide Park Lands Authority 2023-2028 Strategic Plan Strategic Plan Alignment – Expert Advice 4.1 Provide advice on plans, project and policies for the Adelaide Park Lands
City of Adelaide Strategies	The City of Adelaide Strategic Plan Our Environment The status, attributes and character of our green spaces and the Park Lands are protected and strengthened. This report aligns with the Community Land Management Plan for the Adelaide Park Lands (CLMP).
Policy	The Adelaide Park Lands Management Strategy and Community Land Management Plan for the Adelaide Park Lands recognise the need to provide parking for the Royal Adelaide Show in a sustainable manner.
Consultation	The Royal Agricultural & Horticultural Society and other key stakeholders have been engaged in development of the proposals and content within this report. Kaurna Yerta Aboriginal Corporation (KYAC) Nil.
Resource	The negotiation of the Deed of Agreement will be undertaken within existing Council resources. External legal advice will be sought as required throughout the negotiation process and for final review. Council's UPark team manage the Park Land parking through a combination of City of Adelaide and temporary labour-hire staff. A combination of City of Adelaide City Operations - Horticulture Staff and Contractor Staff deliver the required ground preparation and remediation.
Risk / Legal / Legislative	<i>Environment Protection and Biodiversity Conservation (EPBC) Act 1999</i> The Adelaide Park Lands contains threatened native species and ecological communities that are protected under the EPBC. Like the existing Deed, the areas allocated to parking will exclude areas of significant biodiversity. Prior to the provision of parking each year City Operations - Horticulture and Strategic Property & Commercial - UPark teams meet to inspect the Park Lands and restrict parking in any newly identified biodiversity areas.
Design	National Heritage Management Plan (NHMP) The National Heritage Management Plan (NHMP) aims to minimise car parking within the Park Lands and City Squares while ensuring adequate transport and temporary parking for events.

	It promotes reducing reliance on private vehicles by encouraging alternative transport options and restructuring temporary parking within the southern Park Lands to protect their historic form and plantings. Additionally, the NHMP promotes the restoration of redundant car parking and hardstand areas to parkland where possible.
Opportunities	Revenue generated through the provision of Park Land parking is used to improve the Sports Ovals in Golden Wattle Park.
City of Adelaide Budget Allocation	Negotiation of the Deed will be completed within the operating budgets of the relevant teams. The expense and revenue for delivery of Park Land parking for the Show are included in the Commercial Parking operating budget.
Capital Infrastructure Projects	Not applicable
Life of Project, Service, Initiative or (Expectancy of) Asset	The Society's request is for 3 x 10-year terms, totalling 30 years. In accordance to the current Deed it is recommended that a shorter term of 15 years, in line with the existing Deed be considered, comprising one initial term of 5 years and two subsequent renewal terms of 5 years.
Ongoing Costs (eg maintenance cost)	\$40,000 of the Commercial Parking operating budget is allocated to grounds maintenance. The majority of this is related to preparation and remediation of the Sports Fields in Golden Wattle Park. City of Adelaide's Strategic Property & Commercial- UPark team, in consultation with City Operations - Horticulture team, manage the parking to minimise impact to the Park Lands, so remediation costs for the Park Lands following the Show is minimal.
Other Funding Sources	Not applicable.

Discussion

Background

1. The first Royal Adelaide Show was held in 1840. This culturally significant event is the longest-running ticketed event in South Australia, attracting up to half a million people each year.
2. Since 1926 Council has provided parking in Josie Agius Park to support the event. This expanded over the following years to include Golden Wattle Park and the Edward Park area on the old netball courts in GS Kingston Park.
3. In 2011 Council entered into a Deed of Agreement with the Society to provide Park Land parking for the Royal Adelaide Show for an initial period of five years, with the Society having the right to extend for two renewal periods of five years each. The Society exercised this right on both occasions. **Attachment A**

Current Council Policy

4. The Adelaide Park Lands Management Strategy – Towards 2036 (Strategy). currently with the Minister for Planning for adoption, contains the following directives regarding parking on the Adelaide Park Lands.
 - 4.1. Strategy 2.11 - Where appropriate return car parking on the Adelaide Park Lands to a Park Lands Purpose and consider temporary uses of existing car parking to provide greater community benefit.

- 4.2. The Strategy supports an overall reduction in existing car parking in the Adelaide Park Lands. Existing car parking is accommodated in some locations in the Adelaide Park Lands. Where appropriate, existing car parking will encourage multiple uses such as market stalls, events, community, sport, and recreation opportunities, and electric vehicle charging to maximise public access to existing infrastructure. Car parking will minimise its impact on the landscape, provide for additional greening and trees, and incorporate water-sensitive urban Design.
- 4.3. The target is to reduce existing car parking on land managed by the City of Adelaide by 5% based on the 2022 baseline.
- 4.4. South-West Park Lands Precinct
 - 4.4.1. Manage car parking for the Royal Adelaide Show according to the Deed of Agreement with the Royal Agricultural and Horticultural Society of SA
5. The Community Land Management Plan for the Adelaide Park Lands (October 2023) reflects the use of the Adelaide Park Lands to provide temporary car parking for visitors during the Royal Adelaide Show under a Deed of Agreement with the Royal Agricultural and Horticultural Society of South Australia.

The Proposal

6. The key objectives of the Deed are:
 - 6.1. To recognise the parties' shared aspiration of eventually moving broad acre parking from the Park Lands for the Royal Adelaide Show,
 - 6.2. Provide for the ongoing interim use of the Park Lands for parking; and
 - 6.3. Provide for the relocation of parking areas and better parking management to minimise damage to the Park Lands.
7. As part of the Deed, parking for the Show was removed from or reduced in Park Land areas containing remnant native vegetation.
8. Adelaide Community Sports and Recreation Association holds a license for the Sports Ovals in Golden Wattle Park. As part of the Deed, the license holder's use of the ovals is restricted or prevented during the Show, and they are used for parking in lieu of these Park Land areas.
9. Parking is managed by City of Adelaide's Strategic Property and Commercial - UPark team, in consultation with the City Operations - Horticulture team, which is responsible for
 - 9.1. Preparation and maintenance of the sports ovals to improve ground conditions to sustain car parking.
 - 9.2. Parking will be managed in the Parklands and the sports ovals to minimise impact on the grounds throughout the Show period.
 - 9.3. Remediation of the Ovals, and any required for Park Lands, due to the parking impacts.
10. Josie Agius Park is utilised by 80% of patrons, Golden Wattle Park by 19%, and GS Kingston by 1%.
11. Parking is provided at a fee that covers the Council's operating costs, Park Land remediation and returns a profit. Approximately 25,000 to 35,000 users park in the Park Lands each year.
12. The Society has introduced several initiatives to encourage and support the implementation of specific sustainable transport options for the Adelaide Showground. It has retained its long-term goal of 90% of patrons travelling to the Show by public transport, walking, or cycling.
13. Over the course of the Deed, parking availability has decreased by approximately 380 spaces due to the installation of new netball courts and greening projects. The current layout is found on the attached plan ([Link 1](#)).
14. Since 2011 the Society has advised, in their letter of 27 March 2025 ([Link 2](#)), they continue to investigate, encourage and support the implementation of specific sustainable transport options for the Showground:
 - 14.1. Assisted and supported the State Government during the construction and activation of the permanent Adelaide Showground Railway Station.
 - 14.2. Acquired further land to enable the Society to increase parking capacity at the Showground.
 - 14.3. Activated strategically placed, dedicated taxi and rideshare ranks.
 - 14.4. Installed bicycle/scooter parking facilities at Northern and Southern entrances to the Showground.
 - 14.5. Supported the installation of a safe pedestrian/bicycle crossing to the Showground from the Park Lands.

- 14.6. Worked collaboratively with the Department for Infrastructure and Transport (DIT) to balance the cost of additional public transport services operated during the Show.
- 14.7. Actively promoted the use of public transport to the Show via website, media and social media in the lead up to and during the event.
- 14.8. Worked with DIT and CoA to provide a convenient, lower-cost alternative to Park Lands parking on weekends of Show; and
- 14.9. Embarked on a master planning exercise that specifically considers event car parking requirements and the Society's long-term ambition to have 90% of patrons travelling to and from the Show by sustainable means.
15. A new Deed would, if approved, reflect the aspirations of the current Deed, namely, to reduce and eventually remove Park Land parking for the Royal Adelaide show and protect the Park Lands.
16. A new Deed would be based on the same or similar terms as the existing Deed, with some changes to mitigate the risk to Council, Key terms include:
 - 16.1. A term equivalent to that of the existing Deed, an initial term of five years followed by two subsequent renewal terms of five years each (total of 15 years).
 - 16.2. Amended clause to require mutual agreement between the parties to extend for the first and second renewal terms. Current Deed had extensions in favour of the Society.
 - 16.3. Existing clauses that enable the management of parking for the Royal Adelaide Show by City of Adelaide staff whilst minimising impact and protecting the Park Lands.
 - 16.4. Parking areas will remain the same, apart from areas where there has been a reduction in parking availability due to the installation of new netball courts and greening projects.
 - 16.5. Amended clause will provide Council the option to reduce available parking for the Royal Adelaide Show over the course of the Deed to accommodate repurposing of the Park Lands.
 - 16.6. Restricted parking areas and the conditions under which they can be utilised will remain the same, to ensure the protection of the Park Lands and vegetation.
 - 16.7. The sports ovals in Golden Wattle Park will remain the main parking area in that park.
 - 16.8. Council will continue to provide discounted parking in its city parking stations adjacent to bus and tram stops during the Show to promote and encourage alternative parking options.
 - 16.9. The Royal Show Park Land parking fee will be set by Council to reflect the convenience of parking in the Park Lands, rather than increasing by CPI or by mutual agreement with the Society.
 - 16.10. Evaluation of the Deed at the end of the first year and then at least twice during the life of the Deed (prior to renewal at the end of year 5 and end of year 10) which includes a review of space requirements in support of the aspiration goals for decreased dependence on the Park Lands for parking, including a progress report from the Society on their Masterplan and initiatives to support the implementation of specific sustainable transport options.
 - 16.11. Continued and increased promotion undertaken by the Society on the use of public transport to the Show via website, media and social media in the lead up to and during the event
17. The existing Deed of Agreement will expire in 2026. The 2026 Royal Adelaide Show will be the last one covered by the current Deed.

Next Steps

18. Should Board endorsement be provided, a Deed of Agreement will be drafted considering the advice received from the Board and based on the key terms detailed in this report.
19. A report and draft Deed of Agreement is scheduled to be presented to the City Planning, Development and Business Affairs Committee Meeting of 3 June 2025 for recommendation to Council at its meeting of 10 June 2025.

Attachments

Attachment A - Royal Show Parking – Executed Deed of Agreement

DEED

ROYAL ADELAIDE SHOW PARKING

THE CORPORATION OF THE CITY OF ADELAIDE

and

ROYAL AGRICULTURAL & HORTICULTURAL SOCIETY OF
SOUTH AUSTRALIA INCORPORATED

DATE

27th of September 2011

PARTIES

THE CORPORATION OF THE CITY OF ADELAIDE of 25 Pirie Street, Adelaide SA 5000
(Council)

ROYAL AGRICULTURAL & HORTICULTURAL SOCIETY OF SOUTH AUSTRALIA
INCORPORATED of PO Box 108, Goodwood SA 5034 (Society)

BACKGROUND

- A. The Society is charged with the responsibility to conduct the Royal Adelaide Show annually at the Adelaide Showground.
- B. Council has the care control and management of Park Lands in the vicinity of the Adelaide Showground, which have historically been used for the purposes of providing parking for the Royal Adelaide Show.
- C. The parties have a long-term goal to phase out the use of the Park Lands for broad-acre parking for the Royal Adelaide Show.
- D. This deed provides a framework within which the parties will work towards achieving that goal and also regulates how parking on the Park Lands will be managed during the interim period.

AGREED TERMS

1. DEFINITIONS AND INTERPRETATION

1.1 Definitions

Adelaide Showground means the land at Wayville, South Australia occupied or controlled by the Society for the purposes of conducting the Royal Adelaide Show.

Business Day means a day that is not a Saturday, Sunday or public holiday in Adelaide.

Commencement Date means the date of execution of this deed.

Initial Term means a term of five years commencing on the Commencement Date.

Park Lands means the Adelaide Park Lands as defined by the Adelaide Park Lands Plan deposited in the General Registry Office of South Australia.

Renewal Terms means two terms of five years each.

Term means the Initial Term and the Renewal Term(s).

1.2 Interpretation

In this deed, unless the context otherwise requires:

- 1.2.1 headings do not affect interpretation;
- 1.2.2 singular includes plural and plural includes singular;
- 1.2.3 words of one gender include any gender;
- 1.2.4 a reference to a party includes its executors, administrators, successors and permitted assigns;
- 1.2.5 a reference to a person includes a partnership, corporation, association, government body and any other entity;
- 1.2.6 a provision is not construed against a party only because that party drafted it;
- 1.2.7 if a provision of this deed binds two or more parties, that provision binds those parties jointly and severally;
- 1.2.8 an unenforceable provision or part of a provision may be severed, and the remainder of this deed continues in force, unless this would materially change the intended effect of this deed;
- 1.2.9 the meaning of general words is not limited by specific examples introduced by 'including', 'for example' or similar expressions; and
- 1.2.10 an obligation on a party to use "reasonable endeavours" to do a thing requires the party to do all the party reasonably can to do the thing, taking into account all of the personal circumstances and commercial interests of that party.

1.3 Background

The Background forms part of this deed and is correct.

1.4 Ambiguity

In the event of any ambiguity in the interpretation of this deed, this deed is to be interpreted in a manner consistent with the Report presented to the Council on 23/8/2011 titled Royal Adelaide Show – Parking [2010/02708].

2. KEY OBJECTIVES

The key objectives of this deed are to:

- 2.1 recognise the parties' shared aspiration of eventually removing broad-acre parking from the Park Lands for the Royal Adelaide Show through:
 - 2.1.1 the cooperative efforts of the parties, the State Government and Local Government to improve public transport capable of servicing the Adelaide Showground; and

-
- 2.1.2 the continued efforts of the Society to improve the parking capacity of the Adelaide Showground;
- 2.2 provide for the ongoing interim use of portions of the Park Lands for parking; and
- 2.3 provide for the relocation of parking areas and better management of parking to minimise damage to the Park Lands.
3. **TERM**
- 3.1 **Term**
- This deed commences on the Commencement Date and expires at the end of the Term.
- 3.2 **Periodic review**
- 3.2.1 The parties will comprehensively evaluate the success and ongoing operation of this deed at the conclusion of the first year and at least twice during the Term with a view to reducing the number of parking spaces in line with the parties' long-term goal.
- 3.2.2 If during the Term the parties agree that the objectives of this deed have been met such that parking on the Park Lands is no longer required, this deed may be terminated in writing.
- 3.3 **Extension of Initial Term**
- 3.3.1 ***First Renewal Term***
- The Society may exercise its right to extend this deed for a period of five years (**First Renewal Term**) by notice in writing to Council prior to the expiry of the Initial Term, on the same terms as this deed except for the exclusion of this clause 3.3.1 commencing immediately after the Initial Term expires.
- 3.3.2 ***Second Renewal Term***
- The Society may exercise its right to extend this deed for a second period of five years (**Second Renewal Term**) by notice in writing to Council prior to the expiry of the First Renewal Term, on the same terms as this deed except for the exclusion of this clause 3.3.2 commencing immediately after the First Renewal Term expires.
4. **GENERAL ACKNOWLEDGEMENTS**
- Council and the Society acknowledge and agree that both parties intend to follow the processes, protocols, procedures and practices outlined in this deed (or such further agreements made by the parties from time to time) and use their reasonable endeavours to seek to fulfil the key objectives of this deed as set out in clause 2.
5. **LONG-TERM TRANSPORT SOLUTION**
- 5.1 The parties will use their reasonable endeavours to achieve their shared long-term objective of removing parking from the Park Lands and will jointly consult

and involve the State Government, adjoining councils and other stakeholders as and when required to facilitate that outcome.

- 5.2 Without limiting clause 5.1, the parties agree to prepare a Public Transport/Alternative Parking Plan (**Plan**) to work in conjunction with the State Government and The Corporation of the City of Unley to progressively reduce the long term parking demand on the Park Lands for the Royal Adelaide Show. The Plan will set aspirational goals for the increased use of public transport and alternative parking and identify strategies for jointly achieving these goals. The parties will jointly implement mutually agreed strategies and aim to reduce parking on the Park Lands as public transport availability increases and as additional (non-Park Lands) parking is made available.
- 5.3 The parties acknowledge that the Society has a long-term goal of 90% of patrons travelling to the Royal Adelaide Show by public transport and in working toward this outcome has, in conjunction with the State Government:
- 5.3.1 installed an international standard bus zone on Goodwood Road;
 - 5.3.2 installed a temporary train station at Goodwood, which operates from the City to the Adelaide Showground;
 - 5.3.3 promoted public transport through its communications plan;
 - 5.3.4 acquired land to enable the Society to gradually increase parking capacity at the Adelaide Showground;
 - 5.3.5 assisted Council in eliminating parking on the Park Lands for other events at the Adelaide Showground by rearranging internal parking operations within the site;
 - 5.3.6 financially supported the Keswick Bike Path situated along the railway line;
 - 5.3.7 introduced a park and ride scheme at ETSA Stadium; and
 - 5.3.8 achieved a re-zoning of the Adelaide Showground to allow for multi-storey car parks combined with office blocks.
- 5.4 Without limiting clauses 5.1 and 5.2, the Society will use its reasonable endeavours to continue to investigate, encourage and support the implementation of specific sustainable transport options including:
- 5.4.1 electrification, modernisation and extension of rail services;
 - 5.4.2 construction of a permanent rail station servicing the Adelaide Showground and future Keswick Barracks development;
 - 5.4.3 extension of tram services and return of tram line into the Northern end of the Adelaide Showground;
 - 5.4.4 introduction of modern computerised public transport ticketing services that can be integrated into public event ticketing; and

-
- 5.4.5 a cultural shift within the community toward public transport as a result of providing convenient, reliable, affordable, safe and contemporary services.

6. INTERIM PARKING ARRANGEMENTS

6.1 Acknowledgements

The parties acknowledge and agree that:

- 6.1.1 Council (and the Adelaide Park Lands Authority) has a general policy position to work towards removing parking on the Park Lands, in order to best manage and conserve the Park Lands;
- 6.1.2 the required large scale improvements to public transport, including those set out in clause 5.4, are unlikely to be in place within the short term; and
- 6.1.3 given the considerable social and cultural importance of the Royal Adelaide Show it is considered reasonable to provide assurance to the Society and the public with respect to the continued availability of the Park Lands for parking, while taking appropriate steps to protect the amenity of the Park Lands.

6.2 Parking areas

- 6.2.1 Those areas of the Park Lands shaded in red, or shaded in green and outlined in red, on the plan attached as Annexure A will be made available for parking for a maximum of 2,650 vehicles, subject to clause 6.2.2.2, as required from time to time for the Royal Adelaide Show, subject to ground conditions being considered suitable at the time.
- 6.2.2 Those areas of the Park Lands marked "Area D" and "Area E" on the plan attached as Annexure A contain remnant native vegetation and as such will only be made available for parking for the Royal Adelaide Show:
- 6.2.2.1 if ground conditions on the sporting fields (part of the areas described in clause 6.2.1 above) are unsuitable for parking and only until such surfaces are improved; and
- 6.2.2.2 on up to three occasions during the Royal Adelaide Show as overflow areas on high-attendance days;
- and Council will install signage as required to educate the public as to why parking will generally not be permitted on certain areas of the Park Lands.
- 6.2.3 Suitability of ground conditions will be determined by Council (acting reasonably) having regard to weather, works and other relevant factors in consultation with the Society prior to and during the Royal Adelaide Show.

-
- 6.2.4 It is acknowledged that certain areas of the Park Lands may in future and from time to time be redeveloped or otherwise subject to works such that they will, either temporarily or permanently, be unsuitable for parking. In any such event, Council will make provision for the parking of a minimum of 2,650 vehicles upon alternate proximate areas of the Park Lands, subject to ground conditions being considered suitable at the time.

6.3 Responsibility for management of parking

- 6.3.1 Council will continue to manage parking operations on the Park Lands.
- 6.3.2 Council will undertake an annual review of its traffic management plan for Royal Adelaide Show parking, in consultation with the Society, SAPOL and the City of Unley.
- 6.3.3 Where Council considers it reasonable and practicable, Council undertakes to provide a limited amount of discounted parking in its city parking stations adjacent to bus and tram stops during the Royal Adelaide Show to discourage parking on the Park Lands.

6.4 Fees

Current fees charged by Council for parking on the Park Lands will during the Term only be increased annually in accordance with the Adelaide CPI, except as otherwise agreed between the parties.

6.5 First right of refusal to manage parking within the Adelaide Showground during the period of the Royal Adelaide Show

If during the Term the Society proposes to enter into a contract or other arrangement for the management of off-street parking within the Adelaide Showground during the period of the Royal Adelaide Show:

- 6.5.1 the Society must serve on Council written notice of the Society's intention enter into a contract or other arrangement for the management of off-street parking for the period of the Royal Adelaide Show (**Notice**) and the terms upon which the Society is prepared to enter into such contract or other arrangement (**Contract**);
- 6.5.2 Council may accept the offer within 30 days after service of the Notice and Contract on Council by delivering to the Society the Contract executed by Council;
- 6.5.3 upon acceptance of the offer, the parties are bound by the Contract;
- 6.5.4 within seven days after receipt of the Contract, the Society must execute the Contract and deliver a copy to Council;
- 6.5.5 if Council does not accept the offer, the Society may enter into a contract with a third party within three months of the Notice at a price and on terms that are not less favourable to the Society;
- 6.5.6 the term of any Notice given under this clause shall be kept strictly confidential between the parties to this deed.

6.6 Displacement of existing Park Lands licence holders

6.6.1 ***Adelaide Lutheran Sports and Recreation Association Incorporated***

- 6.6.1.1 The Adelaide Lutheran Sports and Recreation Association Incorporated (**ALSRA**) has a licence over part of the Park Lands, namely certain sports ovals.
- 6.6.1.2 The ALSRA's use of the sports ovals during the Royal Adelaide Show will be restricted or prevented as required (by suspension of the ALSRA's licence to use such area or otherwise).
- 6.6.1.3 Council will use its reasonable endeavours to relocate the ALSRA to alternative sports ovals during the Royal Adelaide Show.
- 6.6.1.4 Council supports the allocation of a reasonable and appropriate portion of revenue obtained from Royal Adelaide Show parking to assist with improvements to the sports ovals, specifically:
 - (a) a connection to the Glenelg Adelaide Pipeline recycled water supply;
 - (b) an initial series of treatments to improve the playing/parking surface;
 - (c) a contribution towards the annual maintenance of the playing surface to improve the capability of the surface to sustain vehicular traffic; and
 - (d) ongoing restoration following parking.

6.6.2 ***SA United Church Netball Association Incorporated***

- 6.6.2.1 The SA United Church Netball Association Incorporated (**SAUCNA**) has a licence over portion of the Park Lands, namely certain netball courts.
- 6.6.2.2 The SAUCNA's use of the parking area adjacent to the netball courts during the Royal Adelaide Show will be restricted or prevented as required (by suspension of the SAUCNA's licence to use such area or otherwise).
- 6.6.2.3 The SAUCNA has been advised by Council that parking on the parking area during the Royal Adelaide Show will attract a fee.

7. COMMUNICATION AND CONSULTATION

While the parties acknowledge the responsibility each party has to their own constituencies, they further agree to a process of communiqués and community consultation and to refrain from any deliberate and adverse public comments regarding

the other parties to this deed (in the context of the subject matter of this deed) should disagreements arise in the pursuit of the objectives set out in this deed.

8. CONFIDENTIALITY AND FOI

- 8.1 The *Freedom of Information Act 1991* (SA) (**FOI Act**) gives members of the public rights to access documents of Council. The FOI Act promotes openness in governance and accountability of government agencies and to achieve these objects confers on members of the public a legally enforceable right to be given access to documents, including contracts, held by Council subject but not limited to such restrictions as are consistent with the public interest, commercial in confidence and/or the preservation of personal privacy in respect of those from whom information is collected and held by Council and other public authorities.
- 8.2 The Society acknowledges Council's obligations to comply with the FOI Act and consents to any disclosures by Council, subject to the Society's rights of consultation, review and appeal, and such other challenge to legal disclosure as the Society may make.

9. TERMINATION FOR BREACH

- 9.1 A party may elect to terminate this deed if another party breaches a condition of this deed and fails to rectify such breach within a reasonable time of being requested in writing to do so.
- 9.2 Without prejudice to the rights of a party in respect of any claim or breach of the provisions of this deed prior to the date of termination, the liability of each party under this deed shall cease upon termination.
- 9.3 Clause 8 and any obligation that arises prior to termination shall survive termination of this deed.

10. DISPUTE RESOLUTION

10.1 General

- 10.1.1 A party must not commence arbitration or court proceedings (except for urgent relief) in respect of a dispute under this deed, unless it first attempts to resolve the dispute by negotiation and mediation under this clause.
- 10.1.2 A party claiming that a dispute has arisen under this deed must give written notice to the other party specifying the nature and details of the dispute.
- 10.1.3 On receipt of that notice by the other party, the parties must negotiate in good faith to resolve the dispute.
- 10.1.4 If the parties are unable to resolve the dispute within 10 Business Days, they must promptly refer the dispute to their respective Chief Executive Officers.
- 10.1.5 Those persons must meet to resolve the dispute and must be authorised to resolve the dispute.

10.2 Mediation

- 10.2.1 If those persons are unable to resolve the dispute within 10 Business Days of referral, a party may refer the dispute for mediation under the mediation rules of the Law Society of South Australia Inc to:
 - 10.2.1.1 a mediator agreed by the parties; or
 - 10.2.1.2 if the parties are unable to agree a mediator within five Business Days, a mediator nominated by the President of the Law Society or the President's nominee.
- 10.2.2 The role of a mediator is to assist in negotiating a resolution of the dispute. A mediator may not make a decision that is binding on a party unless that party has agreed in writing.
- 10.2.3 Any information or documents disclosed by a party under this clause:
 - 10.2.3.1 must be kept confidential; and
 - 10.2.3.2 may not be used except to attempt to resolve the dispute.
- 10.2.4 Each party must bear its own mediation costs. The parties must bear equally the costs of any mediator.

10.3 Arbitration

- 10.3.1 If the dispute is not resolved within 10 Business Days of appointment of the mediator, a party may refer the dispute to:
 - 10.3.1.1 an arbitrator agreed by the parties; or
 - 10.3.1.2 if the parties are unable to agree an arbitrator within five Business Days, an arbitrator nominated by the Chairperson of the South Australian Chapter of The Institute of Arbitrators and Mediators Australia or the Chairperson's nominee.
- 10.3.2 A referral to arbitration is a submission to arbitration within the meaning of the *Commercial Arbitration and Industrial Referral Agreements Act 1986* (SA).
- 10.3.3 The party serving the notice of arbitration must lodge with the arbitrator a security deposit for the cost of the arbitration proceedings.
- 10.3.4 The arbitrator may determine the amount of costs, how costs are to be apportioned and by whom they must be paid.

10.4 Performance

If possible, each party must perform its obligations under this deed during negotiations, mediation and arbitration proceedings.

11. NOTICES

- 11.1 Any notice issued under this deed must be in writing and either sent by facsimile, mail or delivered by hand.

11.2 A notice to Council must be addressed to:

Position: Chief Executive Officer

Address: 25 Pirie Street, Adelaide SA 5000

Fax: 08 8203 7709

11.3 A notice to the Society must be addressed to:

Position: Chief Executive Officer

Address: PO Box 108, Goodwood SA 5034

Fax: 08 8212 1944

11.4 A notice may be signed by a party's authorised legal or other representative.

11.5 A notice sent by mail or delivered by hand is effective upon receipt.

11.6 A notice sent by facsimile is effective upon receipt of confirmation of successful transmission to the recipient unless it is transmitted after the close of normal business hours, or on a Saturday, Sunday or public holiday, in which case it is effective on the opening of business on the next Business Day at the intended place of receipt.

12. GENERAL

12.1 Relationship between the parties

12.1.1 The relationship between the parties is limited to the purposes of this deed and is not to be construed as a partnership, joint venture, principal and agent, trust, fiduciary or any other special relationship.

12.1.2 No party is obliged to incur any further obligation unless it expressly agrees to do so in writing.

12.1.3 The parties will not assume or create, or attempt to assume or create, directly or indirectly, any obligation on behalf of, or in the name of, the other party.

12.2 Assignment

A party must not assign any of its rights under this deed without the prior written consent of the other party.

12.3 Amendment

This deed can only be amended, modified, varied, released or discharged by written agreement of the parties and will form an annexure to this deed.

12.4 Severability

If any provision in this deed is voidable or unenforceable, that provision will be severed and the rest of this deed will remain in full force and effect.

12.5 No waiver

- 12.5.1 No right under this deed will be deemed to be waived except by notice in writing signed by the party giving the waiver.
- 12.5.2 A waiver by a party under clause 12.5.1 will not prejudice that party's rights in respect of any subsequent breach of this deed by the other party.
- 12.5.3 Subject to clause 12.5.1, any failure by a party to enforce any clause of this deed, or any forbearance, delay or indulgence granted by the party to the other party, will not be construed as a waiver of the first mentioned party's rights under this deed.

12.6 Governing law

The laws of South Australia apply to this deed and the parties submit to the non-exclusive jurisdiction of the courts of South Australia.

12.7 Announcements

No party may make any press or other release or announcement relating to the commercial terms of this deed without the written approval of the other parties as to form, content and manner of the announcement or release.

12.8 Entire agreement

This deed constitutes the entire, final and concluded agreement between the parties in relation to the subject matter contained herein. It supersedes any previous arrangements, correspondence, tenders, representations, proposals, understandings and communications whether oral or in writing.

12.9 Costs

Each party will bear its own costs of and incidental to the preparation, negotiation, execution and stamping of this deed.

EXECUTED AS A DEED

COUNCIL

Signed for THE CORPORATION OF
THE CITY OF ADELAIDE by its
authorised delegate in the presence of:


.....
Signature of witness

PATRICIA KRIEL
.....
Name of witness (print)


.....
Signature of authorised delegate

PETER SMITH
.....
Name of authorised delegate (print)

CEO
.....
Position of authorised delegate

SOCIETY

The common seal of ROYAL
AGRICULTURAL & HORTICULTURAL
SOCIETY OF SOUTH AUSTRALIA
INCORPORATED was affixed in the
presence of:


.....
Signature of Authorised Officer

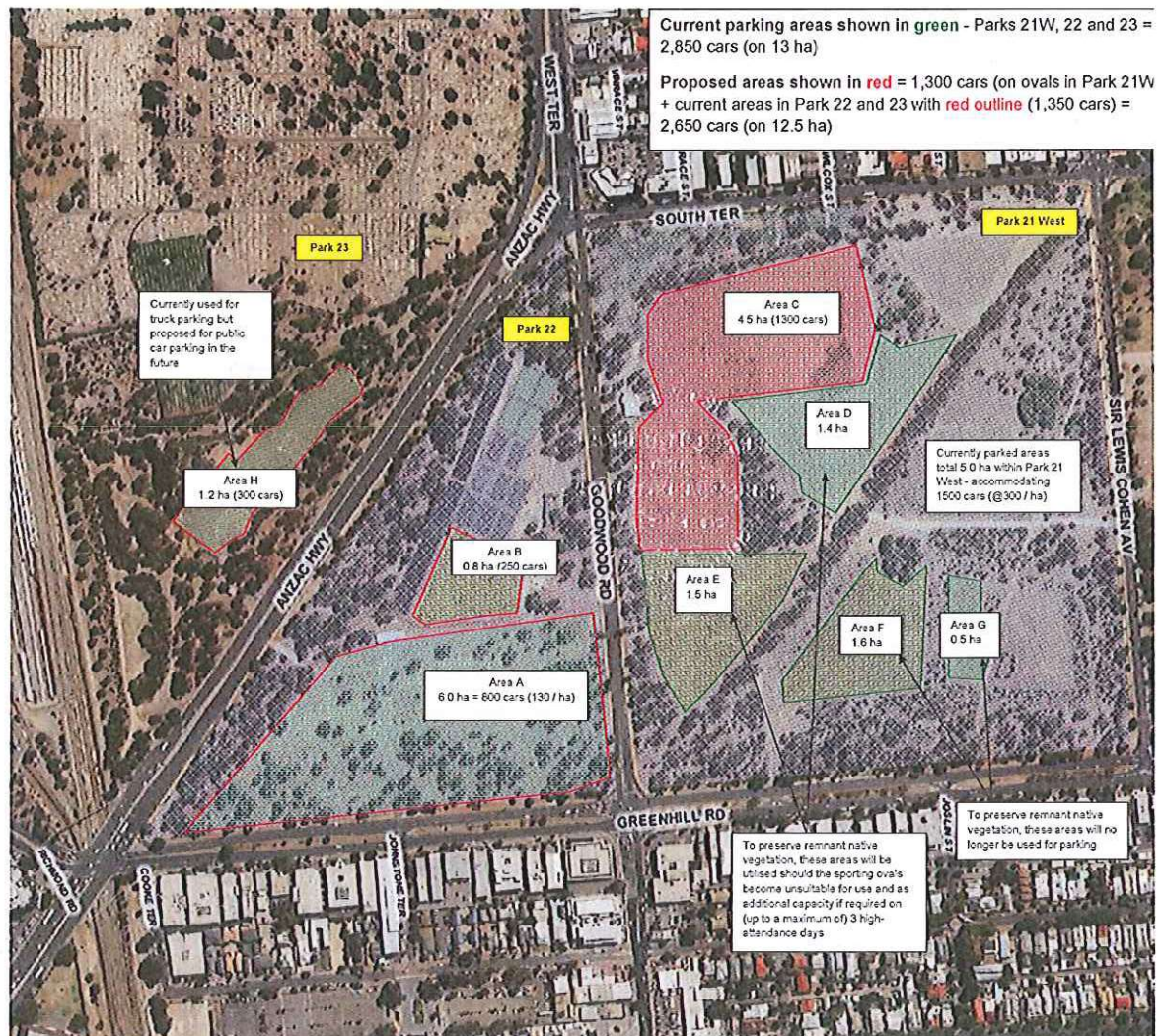
BRUCE MCFARLANE
.....
Name (print)


.....
Signature of Authorised Officer

JOHN W ROTHWELL
.....
Name (print)

Annexure A Plan

 = Current parking
  = Proposed parking
  = Current and proposed parking



Kadaltilla

Adelaide Park Lands Authority

Park Lands Leasing – Expressions of Interest: King Rodney Park / Ityamai-itpina (Park 15) and Carriageway Park / Tuthangga (Park 17)

**Wednesday, 30 April 2025
Board Meeting**

Author:

Jennifer Kalionis, Associate
Director City Culture

Public

Purpose

This report seeks the endorsement of Kadaltilla / Adelaide Park Lands Authority (Kadaltilla) for Council Administration to negotiate five-year Park Lands Community Lease Agreements with Christian Brothers College for two Adelaide Park Lands community facilities in King Rodney Park / Ityamai-itpina (Park 15) and Carriageway Park / Tuthangga (Park 17).

These two sites were the subject of an Expression of Interest (EOI) process undertaken between 25 November 2024 and 13 January 2025.

An EOI is required by section 13 of the City of Adelaide's Adelaide Park Lands Leasing and Licensing Policy (Policy).

The leasing of these Park Lands facilities to community organisations and educational institutions supports the City of Adelaide Strategic Plan (2024-2028) and the key action to 'enable community-led services which increase wellbeing, social connections and participation in active lifestyles, leisure, recreation and sport' and the Adelaide Park Lands Management Strategy objective to 'strengthen the role of the Park Lands as a regional destination for competitive sport and a variety of active and passive forms of recreation'.

Christian Brothers College currently leases these facilities and has demonstrated the capacity to maintain them to a standard that supports year-round use by their participants and the broader community.

Recommendation

THAT THE KADALTILLA / ADELAIDE PARK LANDS AUTHORITY ADVISES COUNCIL:

That the Kadaltilla / Adelaide Park Lands Authority:

1. Notes the Expression of Interest submissions received for the two Park Lands facilities as shown in Attachment A to Item 6.2 on the Agenda for the meeting of the Board of Kadaltilla / Adelaide Park Lands Authority held on 30 April 2025.
2. Endorses the Chief Executive Officer or delegate to enter into lease negotiations with Christian Brothers College for five-year Park Lands Community Lease Agreements for the sports buildings, playing fields and sports courts located in King Rodney Park / Ityamai-itpina (Park 15) and Carriageway Park / Tuthangga (Park 17) as shown in Attachment B to Item 6.2 on the Agenda for the meeting of the Board of Kadaltilla / Adelaide Park Lands Authority held on 30 April 2025.

Implications

Adelaide Park Lands Management Strategy 2015-2025	Adelaide Park Lands Management Strategy 2015-2025 Strategy 1.6: Strengthen the role of the Park Lands as a regional destination for competitive sport and a variety of active and passive forms of recreation. The Strategy contains targets to “ <i>grow organised sport by 10% with the majority of this growth being accommodated via increased utilisation of existing sport fields/facilities, rather than through additional sports zones.</i> ” (Page 41)
2023-2028 Strategic Plan	Kadaltilla / Adelaide Park Lands Authority 2023-2028 Strategic Plan Strategic Plan Alignment – Expert Advice Key Action 4.1 - Provide advice on plans, projects, and policies for the Adelaide Park Lands.
City of Adelaide Strategies	City of Adelaide Strategic Plan 2024-2028 A key action is to ‘enable community led services which increase well-being, social connections and participation in active lifestyles, leisure, recreation and sport.’
Policy	Adelaide Park Lands Community Land Management Plan (CLMP) The CLMP supports leasing and licensing of various community sports facilities located within King Rodney Park / Ityamai-itpina (Park 15) and Carriageway Park / Tuthangga (Park 17). Adelaide Park Lands Leasing and Licensing Policy (Policy) The Expression of Interest (EOI) process was undertaken in accordance with section 13 of the Policy and the new lease agreements will be issued in accordance with the Policy.
Consultation	This matter will be presented to the City Community Services and Culture Committee in May 2025.
Resource	The execution of the Park Lands Lease Agreements will be undertaken within current resources.
Risk / Legal / Legislative	The current Park Lands Community Lease Agreements for Parks 15 and 17 are due to expire on 31 August 2025. This report recommends entering into new lease agreements with the successful applicant.
Opportunities	Partnering with educational institutions and community organisations to provide formal recreation and sport opportunities in the Park Lands.
City of Adelaide Budget Allocation	The lease agreements will generate approximately \$9,684 in annual revenue in the 2025/26 financial year, indexed annually for the next five years.
Life of Project, Service, Initiative or (Expectancy of) Asset	Five-year lease agreements.
Ongoing Costs (eg maintenance cost)	The Lessee will undertake maintenance of the leased assets.
Other Funding Sources	The Lessee will fund the ongoing maintenance and upkeep of these Park Lands community facilities over the next five years, which is estimated at \$350,000 annually.

Discussion

1. The Adelaide Park Lands Leasing and Licensing Policy (Policy) requires an Expression of Interest (EOI) process to be undertaken before granting any new lease for a period of greater than 12 months (including the renewal of a lease or licence).
2. The results of this EOI process are being referred to Kadaltilla / Adelaide Park Lands Authority (Kadaltilla) for advice as the Policy requires that the outcome of all EOI submissions received be considered by Council.
3. The following two Park Lands areas were subject to an EOI process:

Park	Facilities	Current Lessee
King Rodney Park / Ityamai-itpina (Park 15)	2 x sports ovals, cricket nets, community building and storage facility	Christian Brothers College
Carriageway Park / Tuthangga (Park 17)	Synthetic sports field / sports courts	Christian Brothers College

Expression of Interest Process

4. In accordance with the Policy, an EOI process was undertaken over a six-week period commencing Monday, 25 November 2024, and concluding Monday, 13 January 2025.
5. The EOI was promoted through Our Adelaide, social media posts and direct e-mails to known community recreation and sports organisations and educational institutions, including organisations that had previously indicated an interest in leasing sporting facilities in the Adelaide Park Lands.
6. The EOI undertaken for Park 15 (see Image 1) was for:
 - 6.1. A single storey community building with basic change room amenities
 - 6.2. A single storey storage facility
 - 6.3. Two sports fields of approximately 2.84ha in total with lighting.



Image 1: Location Plan - King Rodney Park / Ityamai-itpina (Park 15)
Red = Licenced playing fields / Blue = Leased buildings

7. The EOI undertaken for Park 17 was for an existing rectangular synthetic turf sports field with markings to support five tennis courts (see Image 2). The facility is not serviced by a building or other structure.



Image 2: Location Plan - Carriageway Park / Tuthangga (Park 17)
Red = Licenced synthetic turf sports field

Expression of Interest Assessment

8. At the closure of the EOI period, submissions were received from the following organisations (see **Attachment A**):
- 8.1. Volleyball SA (submitted for Park 15 and 17)
 - 8.2. Christian Brothers College (submitted for Parks 15 and 17).
9. An assessment of the submissions was undertaken in accordance with the Evaluation Criteria developed for this EOI process by a panel consisting of the following members of Council Administration:
- 9.1. Project Lead, Community Lifestyle
 - 9.2. Coordinator, Recreation and Sporting Programs
 - 9.3. Community Leasing Coordinator
 - 9.4. Community Facilities Coordinator.
10. The EOI panel reviewed the submissions from Volleyball SA and the Christian Brothers College against the selection criteria and determined that:
- Volleyball SA (VSA)
- 10.1. VSA were seeking a location to establish a beach volleyball facility.
 - 10.2. VSA did not indicate how the site would be programmed or managed outside of its six months of use.
 - 10.3. Establishing a beach volleyball facility would restrict existing multi-use activities occurring on the playing field/sports courts during the beach volleyball season, while the volleyball courts would only be programmed from 6:00pm.
 - 10.4. Sports lighting would need to be installed to support volleyball competitions.
 - 10.5. There would be a significant financial commitment required to install and remove the beach volleyball courts each season, which may become an unreasonable impost on the Lessee.

Christian Brothers College (CBC)

- 10.6. CBC's proposed usage would result in year-round programming through:
 - 10.6.1. daytime physical activity, weeknight training and weekend competitions of community soccer, cricket and Australian Rules Football in Park 15.
 - 10.6.2. daytime programming of tennis, soccer, and hockey in Park 17.
- 10.7. CBC's submission successfully illustrated their ability to align with the Adelaide Park Lands Management Strategy and strengthen the role of the Park Lands as a regional destination for competitive sport and a variety of active and passive forms of recreation.
- 10.8. CBC demonstrated the capacity (within their submission) to maintain the facilities to a standard that supports year-round use by their participants and the broader community.
11. It is recommended that Christian Brothers College be granted five-year lease agreements for the community facilities in Park 15 and Park 17.

Lease Agreements – Terms and Conditions

12. It is recommended that the following high-level terms and conditions be negotiated as part of the new lease agreements (see **Attachment B**):
 - 12.1. Term: Five years
 - 12.2. Lease Fees (Building Rent): \$55 per square metre, discounted by 70% (educational institutions) and reviewed annually.
 - 12.3. Licence Fees: As per the City of Adelaide's annually endorsed Fees and Charges, applied from 1 July each year.
 - 12.4. Permitted Use: Community sport, physical education and associated community development (not-for-profit) activities.

Next Steps

13. Subject to Kadaltilla's endorsement, Administration will recommend to the City Community Services and Culture Committee, that the five-year Park Lands Community Lease Agreements be negotiated with Christian Brothers College.
14. Subject to Council's approval, Administration will notify all EOI applicants of the outcome.
15. Christian Brothers College will have until 31 August 2025 to sign and return the new Park Lands Community Lease Agreements for execution by Administration.

Attachments

Attachment A – Expression of Interest submissions for King Rodney Park / Ityamai-itpina (Park 15) and Carriageway Park / Tuthangga (Park 17)

Attachment B – Draft Park Lands Community Lease Agreements for portions of King Rodney Park / Ityamai-itpina (Park 15) and Carriageway Park / Tuthangga (Park 17)

- END OF REPORT -

Park 15/17 Sports Facilities - EOI

Submitted on	13 January 2025, 10:14am
Receipt number	4
Related form version	3

Section 1: Organisation Details

Organisation/Club Name	Volleyball SA
Organisation website	https://www.volleyballsa.com.au/
Organisation ABN	36231003195
Type of organisation (Tick multiple boxes if required)	Not for Profit Organisation
Where is your organisation?	Based in the city
Is your organisation registered, actively involved in or affiliated with any of the following? (Tick multiple boxes if required)	
Public Liability Insurance	Yes
Copy of Public Liability Insurance Certificate	VOLLEYBALL SA INC - COC 2024.pdf

Postal address

Unit	
Street number	Level 1, 296
Street name	Rundle St
Suburb	Adelaide
Postcode	5000

Section 2: Activity and Participant Details

Sport or Activity	Volleyball SA
Level of competition	We would run a competition that has varying divisions, all grassroots.
What competition/league do you participate in?	VSA host competitions, we would create a new competition for this location.

What demand is there for your sport/activity within Adelaide?	When the beach volleyball courts closed in Adelaide, 1000 participants were no longer able to compete there. We anticipate many of those participants would return if a suitable location in the city was available.
Team type (Tick multiple boxes as required)	Junior Senior
Junior teams - number of male participants	250
Junior teams - number of female participants	250
Senior teams - number of male participants	250
Senior teams - number of female participants	250
Total number of participants	1000
Number of male teams	This would be determined once a competition was established.
Number of female teams	This would be determined once a competition was established.
Total number of teams	100
Will your activity cater for city residents or people from underrepresented population groups?	Yes
As you ticked 'yes' to the above, please provide details	Volleyball is typically a gender equal participation sport, equal men and women participate, so our women and girls participation rates are high.

Section 3: Facility Requirements (Matches/Training/Races)

Day of the week	TBC
Season – (Winter, Summer, or full year) and please provide provisional start and end dates	Summer, October - March
Start time (AM/PM)	Likely 6pm onward, with three time slots
Finish time (AM/PM)	9pm
Which teams will be using the facility for each session and how will you be using it?	This would be for all match play

Section 4: Contact Details - Primary Contact Person

First name	Ashleigh
Surname	Stratford
Position title	Special Projects Manager

Mobile number	0419847848
Email	projects@volleyballsa.com.au

Comments

Any additional information you would like to share?	Per a discussion with Ben, Volleyball SA are looking for a new home for "City Beach". VSA would need to activate the space by putting sand on the space to create our "court". This would need to remain in place for the duration of the season. no other infrastructure would remain as it would be set up and packed down for each use. VSA are very keen to discuss more and use this EOI as a starting point, we understand that this particular situation might not suit both ours and the COA's needs, but we're very keen to discuss any other possible options.
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Section 5: Declaration

First Name	Ashleigh
Surname	Stratford
Signature	

[Link to signature](#)

Park 15/17 Sports Facilities - EOI



Submitted on	27 November 2024, 12:12pm
Receipt number	2
Related form version	3

Section 1: Organisation Details

Organisation/Club Name	EREA Colleges LTD (t/a Christian Brothers College Adelaide)
Organisation website	https://www.cbc.sa.edu.au/
Organisation ABN	11857307720
Type of organisation (Tick multiple boxes if required)	Not for Profit Organisation Educational Institution (Private)
Where is your organisation?	Based in the city Activity in the city Currently holding a head lease/licence in the Adelaide Park Lands
Is your organisation registered, actively involved in or affiliated with any of the following? (Tick multiple boxes if required)	Other: Diverse training across multiple sports
Public Liability Insurance	Yes
Copy of Public Liability Insurance Certificate	Christian Brothers College Adelaide CoP-PPL-2024-25 \$50M.pdf

Postal address

Unit	
Street number	214
Street name	Wakefield Street
Suburb	Adelaide
Postcode	5000

Section 2: Activity and Participant Details

Sport or Activity	Football Soccer Cricket Tennis Athletics (track) Cross Country Physical Education Major Events (Adelaide 500, Harvest Rock and Tour Down Under)
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Level of competition	Cricket - First XI, Second XI, Middle A2, Middle B2, Year 6 South, Year 5 South, Year 4, Year 3 Kanga, Year 2 Kanga Football (School) - First XVIII, Second XVIII, Middle A3, Year 5/6, Year 4 - Girls teams from City based schools Soccer (School) - First XI (Division 1), Second XI (Division 2), Third XI (Division 2), Open B, Open C, Middle A1, Middle B1, Middle C1, Middle D, Year 7A1, Year 7B Purple, Year 6 Year, Year 5/6, Year 5, Year 4 Tennis - Drive, Open B, Middle A, Middle B, Year 7, Year 5/6A, Year 5/6B Athletics - Achilles Cup (Year 7 - 12), SACPSSA Cross Country (Year 2 - 6), Cross Country (Year 2 - 12) Physical Education - Reception to Year 12 Football (CBCOC) - A Grade, B Grade and C Grade Soccer (CBCOC) - 1st and 2nd Team (Div 3A and Div 3B)
What competition/league do you participate in?	Soccer (CBCOC) - Collegiate Soccer League Football (CBCOC) - Adelaide Footy League Soccer School - SAAS, Schoolsport SA Football School - SAAS Cricket School - SAAS Tennis - SAAS Athletics School - SAPSASA, SACPSSA, Ediken Relay, SAAS
What demand is there for your sport/activity within Adelaide?	Football is the highest demand activity in Australia, with other sports such as cricket and soccer having a high and increasing demand. Tennis and athletics, whilst having lower participation still see large numbers for participants and spectators. See AusPlay for SA Statistics for Adult and Child participation rates https://www.clearinghouseforsport.gov.au/__data/assets/excel_doc/0003/1165269/AU-SA-Data-Tables-31-October-2024.xlsx .
Team type (Tick multiple boxes as required)	Junior Senior
Junior teams - number of male participants	280
Junior teams - number of female participants	5
Senior teams - number of male participants	1,000
Senior teams - number of female participants	100
Total number of participants	1385
Number of male teams	45
Number of female teams	3
Total number of teams	48
Will your activity cater for city residents or people from underrepresented population groups?	Yes
As you ticked 'yes' to the above, please provide details	Women and girls from city-based schools and clubs. School is highly diversified and represents people of all abilities, cultures and low socio-economic backgrounds

Section 3: Facility Requirements (Matches/Training/Races)

Day of the week	Mon, Tues, Wed, Thurs, Fri, Sat
Season – (Winter, Summer, or full year) and please provide provisional start and end dates	Full Year - 1 January to 31 December

Start time (AM/PM)	6am
Finish time (AM/PM)	9pm
Which teams will be using the facility for each session and how will you be using it?	Mon to Fri school teams for training including city-based girls' schools (various sports) - Tues and Thurs CBCOC football training - Mon and Wed CBCOC soccer training - Wed afternoon female football matches on occasion - Fri afternoon T20 cricket, tennis matches and female football matches, Sat morning school matches, Sat afternoon CBCOC soccer and football matches, Mon - Fri school PE and play, Mon - Thurs use by other outside groups such as umpires, Sturt etc, Mon to Fri school athletics

Section 4: Contact Details - Primary Contact Person

First name	Graham
Surname	Brink
Position title	Property Manager
Mobile number	0403588457
Email	gbrink@cbc.sa.edu.au

Comments

Any additional information you would like to share?	The ovals (Park 15) have been used by the College since the 1890's and we have documentation in our archives of cricket being played on the bottom oval in 1909 and was known as the CBC cow paddocks up until 1958. In 1958 the College commenced with a rejuvenation project of the ovals commencing with weekend works, during which irrigation and new fencing was installed. Through the invaluable work and assistance of the Parents and Friends Association at the time, the College was able to raise enough funds to install a proper cricket wicket and to build new change rooms. After two hard years the new facilities were opened by the Minister for Education, Mr Baden Pattinson. The College has continually made improvements to the facility including flood lighting and many that are hidden from sight such as GAP water connections, irrigations systems, drainage systems and many other improvements. The Hutt Street facility (Park 17) was built in the South Parklands in 1949 by the Parents and Friends of CBC at a time when both resources and manpower were in short supply. Approximately 22 years ago, the facility was upgraded with essentially the first generation of artificial turf surfaces. The result was a six-court tennis facility that could also be utilised for junior hockey. After many years of continuous use, the courts were in desperate need of an upgrade so as to maintain safety standards and to best utilise the facility. In 2012 the College undertook a capital project to rejuvenate this facility utilising improved technology in artificial turf surfaces. The result is a modern facility that not only retains tennis courts but also provides opportunities for lacrosse, hockey and soccer, in addition to general PE lessons. The Park 15 facility is located within a regional sports precinct accommodating a range of sports including AFL, soccer, cricket, physical education, cycling, athletics and premier state events, like the Adelaide 500, Harvest Rock, Tour Down Under Classic and the Adelaide 3 Day Event (Horse Trials). The Adelaide Park Lands Management Strategy recognises these facilities and their regional sporting significance. The College is an inner-city school and relies heavily on facilities like these to meet the educational and sporting needs of this Reception – Year 12 student cohort with an enrolment of around 1000 students in 2024. The College has a long history of sharing our facilities with community groups and associations in line with our four core values of Faith, Excellence, Community and Compassion.
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For over one hundred and forty years we have maintained ovals and facilities in the parklands, which are available to be used by the general community.

Occupancy of the facilities is high with College use during the day for sport and physical education activities, with floodlit ovals being used by CBCOC in the evenings. The weekends see a rotation of activities between the College, CBCOC and casual users where applicable. Like many other facilities in the Parklands there is opportunities for non-formal recreational activities and many a family from the community would be able to kick a footy on the pristine grass surface when not in use or a game of tennis. The facilities are open to the public during the day, and it is reasonably common to see casual joggers around the ovals in the morning or afternoon or seeing someone having a game of tennis in Park 17 on the weekends.

We are of the opinion that the College redevelopment of this area of the Parklands into a true sporting hub facility within the Adelaide City Parklands has not only benefited our students, but also the broader community. This is enhanced by the location of the facilities and their excellent proximity to the City and the College. The facilities not only contribute to additional recreation space but has added to the social inclusiveness of the area.

The College currently employs three grounds/maintenance staff and has the financial capabilities to maintain an upgraded facility for the foreseeable future. The College also regularly engages contractors to assist with maintenance and remediation of the facilities. The heaviest use of contractors would be at season change and after major events like the Adelaide 500 and Harvest Rock.

The College is proactive in seeking options to enhance and partner with any group to improve these facilities and is currently examining via the College Masterplan a way to enhance the existing clubrooms. Any future development would be in partnership with CBCOC to ensure the facility not only meets the needs of the College and delivers a true multi-use facility that can service the CBCOC and the broader community.

Section 5: Declaration

First Name

Graham

Surname

Brink

Signature



[Link to signature](#)



CITY OF ADELAIDE

PARK LANDS LEASE AGREEMENT

THE CORPORATION OF THE CITY OF ADELAIDE

(Council)

AND

TRUSTEES OF EDMUND RICE EDUCATION AUSTRALIA (CBC ADELAIDE)

(Lessee)

**[Portion of King Rodney Park / Ityamai-itypina (Park 15) and Carriageway Park /
Tuthangga (Park 17)]**

IMPORTANT NOTICE

Retail and Commercial Leases Act 1995 ("Act")

This Lease is exempt from the application of the Act pursuant to an exemption granted under section 77(1) of the Act by the Minister for Business Services and Consumers on 28 December 2011.

Schedule

Item 1 Premises	That portion of the Park Lands being the area outlined in yellow as marked on the plan attached as Annexure A and known as Portion of King Rodney Park / Ityamai-itpina (Park 15).	
Item 1A Licence Area	That portion of the Park Lands being the area outlined in red as marked on the plan attached as Annexure A and known as Portion of King Rodney Park / Ityamai-itpina (Park 15) and Carriageway Park / Tuthangga (Park 17).	
Item 2 Initial Term	Five (5) years commencing on 1 September 2025 (Commencement Date) and expiring at midnight on 31 August 2030	
Item 3 Renewal(s) (if applicable)	Not Applicable	
Item 4 Lease Fee	Four thousand seven hundred and nineteen dollars and no cents (\$4,719.00) per annum (exclusive of GST) (subject to annual review*) <i>*Calculated at 286sqm x \$55 per sqm less 70% as per Park Lands Leasing and Licensing Policy (2016)</i>	
Item 4A Lease Fee Review Dates and Review Methods	Lease Fee Review Dates 1 July annually during the Term	Lease Fee Review Method In accordance with Council's Adopted Fees and Charges
Item 5 Licence Fee (if applicable)	Four thousand, nine hundred and sixty five dollars and forty cents (\$4,965.40) per annum (exclusive of GST) (subject to annual review*) <i>*Calculated on 3.05ha of open playing fields and maintained by the Lessee. These fees are re-set annually on 1 July.</i>	
Item 5A Licence Fee Review Dates and Review Methods	Licence Fee Review Dates 1 July annually during the Term	Licence Fee Review Method In accordance with Council's Adopted Fees and Charges
Item 6 Premises Permitted Use	Club rooms in association with community sports and related community development activities	
Item 7 Times of Use	Monday to Sunday (inclusive)	

	7.00am to 11.00pm
Item 8 Refurbishment Dates	Three months prior to the expiry of the lease or upon such earlier termination
Item 9 Licence Area Permitted Use	Playing of community sports and related community development activities
Item 10 Special Conditions	1. Adjacent Areas 1.1 In addition to any other terms of this Lease, the Lessee acknowledges and agrees the Lessee is responsible at the Lessee's cost to keep and maintain the landscape elements and features (including all plantings and vegetation) in the Licence Area in good repair and in a clean and tidy state and condition. 2. Motor Vehicle Access for Maintenance and Repairs 3.1 The Lessee is permitted to drive a motor vehicle onto the Park Lands for the purpose of conducting maintenance or repairs on the Premises or Licence Area. 3.2 The Lessee must remove the motor vehicle from the Park Lands when it is not being directly used for maintenance or repairs on the Premises or Licence Area.

PARTIES

THE CORPORATION OF THE CITY OF ADELAIDE of Town Hall, King William Street, Adelaide SA 5000 (**Council**)

and

TRUSTEES OF EDMUND RICE EDUCATION AUSTRALIA (CBC Adelaide) of 214 Wakefield Street, Adelaide SA 5000 (**Lessee**)

BACKGROUND

- A. The Council has the care, control and management of the Park Lands.
- B. The Lessee has requested a lease to occupy the Premises for the Premises Permitted Use.
- C. The Council has resolved to grant the Lessee a lease of the Premises and (if necessary) undertaken public consultation and/or been granted Parliamentary approval in accordance with the *Local Government Act 1999* (SA) and the *Adelaide Park Lands Act 2005*.
- D. The Council and Lessee wish to record the terms of their agreement in this lease.

AGREED TERMS

1. DEFINITIONS AND INTERPRETATION

1.1 Definitions

In this lease:

Agreed Consideration means the Lease and Licence Fee, Outgoings and all other consideration (whether in money or otherwise) to be paid or provided by the Lessee for any supply or use of the Premises and any goods, services or other things provided by the Council under this lease (other than tax payable under clause 20).

Building means the interior and exterior of all present and future improvements on the Premises and includes all Services and all other conveniences, services, amenities and appurtenances of in or to the Building.

Commencement Date means the commencement date described in Item 2 of the Schedule.

Contamination means the presence in, on or under land, air or water of a substance (solid, liquid or gel) or matter at a concentration or level above the concentration or level at which the substance or matter is normally present in, on or under land, air or water in the same locality being a presence that presents a risk of harm to human health or the Environment, or results in a non-compliance with or breach of any Environmental Law (and **contaminant**, **contaminated** and **contaminate** have a corresponding meaning).

Council means the party described as 'Council' in this lease and where the context permits includes the employees, contractors, agents and other invitees of the Council.

Council's Equipment means all fixtures and fittings, plant, equipment, services, chattels and other goods installed or situated in or on the Premises and available for use by the Lessee.

Default Rate means 2% per annum above the Local Government Finance Authority Cash Advance Debenture Rate.

Dispute means a dispute between the Council and the Lessee in relation to this Lease.

Environment includes:

- (a) land, air and water;
- (b) any organic or inorganic matter and any living organism; and
- (c) human made or modified structures and areas.

Environmental Law means any Statutory Requirement that deals with an aspect of the Environment or health whether made before or after the Commencement Date.

GST has the meaning given to that term in the GST Legislation.

GST Legislation means the *A New Tax System (Goods and Services Tax) Act 1999* (Cth) and any ancillary or similar legislation.

GST Rate means 10% or the rate of GST imposed from time to time under the GST Legislation.

Institute means the South Australian Division of the Australian Property Institute.

Initial Term means the initial term of this lease commencing on the Commencement Date and described in Item 2 of the Schedule.

Kadaltilla means the Kadaltilla / Adelaide Park Lands Authority established under the *Adelaide Park Lands Act 2005 (SA)*, and any other relevant body from time to time.

Lease Fee means the lease fee described in Item 4 of the Schedule.

Lease Fee Review Date means each date described in Item 4A of the Schedule.

Lease Fee Review Method means the relevant method of reviewing the Lease Fee in Item 4 A of the Schedule for any Review Date.

Legislation includes any relevant Act of Parliament (whether State or Federal) and any regulation or by-law including by-laws issued by any local government body or authority.

Lessee means the party described as 'Lessee' in this lease and where the context permits includes the employees, contractors, agents, customers and other invitees of the Lessee.

Lessee's Equipment means any and all fixtures and fittings and other equipment installed in or brought on to or kept in the Premises by the Lessee.

Licence means the licence granted under clause 25.

Licence Area means the area described in Item 1A of the Schedule.

Licence Area Permitted Use means the permitted use of the Licence Area described in Item 9 of the Schedule.

Licence Fee means the licence fee described in Item 5 of the Schedule.

Licence Fee Review Dates each date described in Item 5A of the Schedule.

Licence Fee Review Methods each date described in Item 5A of the Schedule.

Maintenance Schedule means the Maintenance Schedule at Annexure BC.

Outgoings means the total of all amounts paid or payable by the Council in connection with the ownership, management, administration and operation of the Premises and/or Building.

Park Lands means the Adelaide Park Lands as defined in the Park Lands Act.

Park Lands Act means the *Adelaide Park Lands Act (SA) 2005*.

Payment Date means the Commencement Date and the first day of each month during the Term.

Premises Permitted Use means the use described in Item 6 of the Schedule.

Premises means the premises described in Item 1 of the Schedule including all present and future improvements thereon and the Council's Equipment.

Rates and Taxes means all present and future rates, charges, levies, assessments, duty and charges of any Statutory Authority, department or authority having the power to raise or levy any such amounts in respect of the use, ownership or occupation of the Park Lands or Premises and includes water and sewer charges, council rates, emergency services levy.

Renewal Term/s means the term/s (if any) of renewal or extension in Item 3 of the Schedule.

Services means all services (including gas, electricity, water, sewerage, fire control systems, air-conditioning, plumbing and telephone and all plant, equipment, pipes, wires and cables in connection with them as applicable) to or of the Premises or Building supplied by any authority, the Council or any other person the Council authorises.

Statutory Authorities means any government or authorities created by or under any relevant Legislation.

Statutory Requirements means all relevant Legislation and all lawful conditions, requirements, notices and directives issued or applicable under any such Legislation or by any Statutory Authorities.

Term means the Initial Term, the Renewal Term/s and any period during which the Lessee holds over or remains in occupation of the Premises.

Times of Use means the periods/times that the Lessee may use the Premises and Licence Area set out in Item 7 of the Schedule:

1.2 Interpretation

In this lease, unless the context otherwise requires:

- 1.2.1 a reference to a party includes its executors, administrators, successors and permitted assigns;
- 1.2.2 a reference to a person includes a partnership, corporation, association, government body and any other entity;
- 1.2.3 a reference to this lease includes any schedules and annexures to this lease;
- 1.2.4 a reference to any document (including this lease) is to that document as varied, novated, ratified or replaced from time to time;
- 1.2.5 a reference to legislation includes any amendment to it, any legislation substituted for it, and any subordinate legislation made under it;
- 1.2.6 an unenforceable provision or part of a provision may be severed, and the remainder of this lease continues in force; and
- 1.2.7 the special conditions in **Error! Reference source not found.**prevail over the terms in the body of this lease to the extent of any inconsistency.

1.3 Background

The Background forms part of this lease and is correct.

2. GRANT OF LEASE

The Council grants and the Lessee accepts a lease of the Premises for the Term as set out in this lease.

3. LEASE FEE

3.1 Payment of Lease Fee

The Lessee must pay the Lease Fee by equal monthly instalments in advance, the first payment to be made on or before the Commencement Date and subsequent payments must be made on the same day of each calendar month during the Term without any abatement, deduction or demand.

3.2 Instalment

If a Lease Fee instalment period is less than a month, the instalment for that period is calculated at a daily rate based on the number of days in the month in which that period begins and the monthly instalment which would have been payable for a full month.

4. REVIEW OF LEASE FEE

4.1 Reviewed via Fees and Charges

The Lease Fee on and from each Lease Fee Review Date is calculated by increasing the Lease Fee in accordance with Council's Adopted Fees and Charges at the time of the relevant Lease Fee Review Date.

5. RATES AND TAXES AND OUTGOINGS

5.1 Liability for Rates and Taxes

5.1.1 The Lessee must pay or reimburse the Council all Rates and Taxes levied, assessed or charged in respect of the Premises or relating to the Lessee's use or occupation of the Premises.

5.1.2 The applicable Rates and Taxes must be adjusted between the Council and the Lessee as at the Commencement Date and the end or termination date of this lease.

5.2 Payment of Outgoings

5.2.1 The Lessee must pay or reimburse the Council all Outgoings levied, assessed or charged in respect of the Premises or upon the owner or occupier of the Premises.

5.2.2 The Outgoings must be adjusted between the Council and the Lessee as at the Commencement Date and the end or termination date of this lease.

5.3 Power and other utilities

5.3.1 The Lessee must pay, when due, all costs for the use of telephone, light and other facilities and the consumption of electricity, gas, water and any and all other services and utilities supplied to or used from the Premises.

5.3.2 If there is no separate meter for a service or utility used on or from the Premises and if the Council so requires, the Lessee must install the meter at its own cost.

5.3.3 Without limiting this subclause, the Lessee must comply with the *Electricity (General) Regulations 2012* (SA) and any other applicable electricity laws.

6. USE OF PREMISES

6.1 Premises Permitted Use

The Lessee may use the Premises only for the Premises Permitted Use and must not use or allow the Premises to be used for any other use without the Council's consent.

6.2 Park Lands

Subject to the terms of this lease, the Lessee must comply with the approved management plans, guidelines and strategies (from time to time) of the Council and Kadaltilla with respect to the use and occupation of the Premises (being part of the Park Lands).

6.3 Offensive activities

The Lessee must not carry on any offensive or dangerous activities on or from the Premises or create a nuisance or disturbance on the Premises at any time, and must ensure at all times that activities conducted on or from the Premises do not discredit the Council.

6.4 Use of facilities

6.4.1 The Lessee must ensure that the Services are used carefully and responsibly and in accordance with any directions given by the Council from time to time.

6.4.2 The Lessee must repair or correct any damage or malfunction which results from any misuse or abuse of the Services by the Lessee.

6.5 Statutory Requirements

The Lessee must comply with all Statutory Requirements (including the *Work Health and Safety Act 2012* (SA) and the *Food Act 2001*) relating to the Lessee's use and occupation of the Premises, as well as the Premises Permitted Use.

6.6 No alcohol

6.6.1 The Lessee must not:

6.6.1.1 serve, sell or provide to persons; or

6.6.1.2 consume or allow persons to consume;

alcoholic beverages on the Premises without the Council's consent.

- 6.6.2 The Lessee must not allow any activities to be carried out on the Premises that would require a liquor licence under the *Liquor Licensing Act 1997 (SA)* without the Council's consent.

6.7 Gaming Machines and gambling

The Lessee must not install or operate gaming machines on the Premises nor promote or allow any gambling related activities on the Premises.

6.8 Signs

The Lessee must not place any sign or advertisement on the outside or inside (if they can be seen from outside) of the Premises, except a sign or advertisement which is approved by the Council and complies with any relevant Statutory Requirements and policies of the Council.

6.9 Dangerous equipment and installations

The Lessee may only install or use within the Premises equipment and facilities which are reasonably necessary for and normally used in connection with the Premises Permitted Use and must not install or bring onto the Premises:

- 6.9.1 any electrical, gas powered or other machinery or equipment that may pose a danger, risk or hazard;
- 6.9.2 any chemicals or other dangerous substances that may pose a danger, risk or hazard; or
- 6.9.3 any heavy equipment or items that may damage the Premises or Building.

6.10 Fire precautions

The Lessee must, at its cost, comply with all Statutory Requirements relating to fire safety and procedures including carrying out any structural works or modifications or other building works which are required as a consequence of the Lessee's use of the Premises.

6.11 Security

The Lessee must keep the Building(s) securely locked at all times when the Building(s) are not occupied and must provide a key, alarm codes and fobs and any other items required for access to the Premises to the Council.

6.12 No vehicles

The Lessee must not or allow any other person to drive, ride or park any vehicle on or over any part of the Park Lands without the consent of Council.

6.13 No warranty

The Council makes no warranty or representation regarding the suitability of the Premises (structural or otherwise) for the Premises Permitted Use or any other purpose.

7. INSURANCE

7.1 Lessee must insure

The Lessee must keep current during the Term:

- 7.1.1 public risk insurance for at least \$20,000,000.00 (or any other amount the Council reasonably requires) for each claim;
- 7.1.2 all insurance in respect of the Lessee's Equipment for its full replacement value; and
- 7.1.3 other insurances required by any Statutory Requirement or which the Council reasonably requires.

7.2 Requirements for policies

Each policy must:

- 7.2.1 be with an insurer and on terms reasonably approved by the Council;
- 7.2.2 be in the name of the Lessee and note the interest of the Council and any other person the Council requires; and
- 7.2.3 cover events occurring during the policy's currency regardless of when claims are made.

7.3 Evidence of insurance

The Lessee must give the Council certificates evidencing the currency of each policy. During the Term the Lessee must:

- 7.3.1 pay each premium before it is due for payment;
- 7.3.2 give the Council certificates of currency each year when the policies are renewed and at other times the Council requests;
- 7.3.3 not vary, allow to lapse or cancel any insurance policy without the Council's consent;
- 7.3.4 notify the Council immediately if a policy is cancelled or if an event occurs which could prejudice or give rise to a claim under a policy.

7.4 Insurance affected

- 7.4.1 The Lessee must not do anything which may:
 - 7.4.1.1 prejudice any insurance of the Premises or the Building; or
 - 7.4.1.2 increase the premium for that insurance.
- 7.4.2 If the Lessee does anything (with or without the Council's consent) that increases the premium of any insurance the Council has in connection with the Premises or the Building, the Lessee must on demand pay the amount of that increase to the Council.

7.5 Council to insure

- 7.5.1 The Council will insure the Building during the Term and the Lessee must reimburse the Council on demand the cost of such insurance.
- 7.5.2 If the Council maintains an insurance policy that covers the Premises and other buildings and improvements, the Lessee must reimburse a share of the Council's cost of such insurance which will be calculated as the proportion the current value of the Premises (as determined by Council) bears from time to time to the value of all other buildings and improvements covered by and included in that insurance.
- 7.5.3 The Council will provide the Lessee with evidence of the currency of such insurance (if requested by the Lessee) provided that if any insurance of Council is maintained under any discretionary self-insured fund then no certificate of currency or copy of any insurance policy will be available to the Lessee.

8. REPAIR AND MAINTENANCE

8.1 Repair and Maintenance

- 8.1.1 The Lessee must, at its cost, keep, maintain, repair and replace the Premises, the Lessee's Equipment and any Services situated within the Premises in accordance with the Maintenance Schedule.
- 8.1.2 Any repairs of a structural nature will be the responsibility of the Council, except if specified otherwise in the Maintenance Schedule or if relating to any alterations to the Premises made by the Lessee in accordance with clause 8.2.
- 8.1.3 The Council may update or amend the Maintenance Schedule at its discretion, acting reasonably, and must provide the Lessee with a copy of the updated or amended Maintenance Schedule.
- 8.1.4 For the avoidance of doubt, the Lessee will be responsible for the repair and maintenance of Council's Equipment during the Term and must replace any damaged (through misuse) or missing Council's Equipment during the Term, to the same standard and value as the original.
- 8.1.5 If the Council so requires, the Lessee must promptly repair any damage to the Premises or Building caused or contributed to by the act, omission, negligence or default of the Lessee.

8.2 Alterations by Lessee

- 8.2.1 The Lessee must not carry out any alterations or additions to the Premises without the Council's consent.
- 8.2.2 The Lessee must provide full details of the proposed alterations and additions to the Council.

- 8.2.3 The Council may impose any conditions it considers necessary, acting reasonably, if it gives its approval, including requiring the Lessee to obtain the Council's consent to any agreements that the Lessee enters into in relation to the alterations or additions.
- 8.2.4 Unless otherwise agreed in writing between the parties, all alterations and additions to the Premises made pursuant to this clause become the property of the Council.
- 8.2.5 The Lessee must pay all of the Council's costs (including consultant's costs and legal costs) as a result of the Lessee's alterations and additions.

8.3 Refurbishment

The Lessee must refurbish the Premises on or before each date specified in Item 8 of the Schedule and in accordance with the following requirements:

- 8.3.1 clean and repair all surfaces to be redecorated;
- 8.3.2 paint or wallpaper, stain, varnish or polish each surface to be redecorated according to the previous treatment of that surface; and
- 8.3.3 comply with all Lessee responsibilities listed in the Maintenance Schedule.

8.4 Cleaning

The Lessee must:

- 8.4.1 keep the Premises clean and tidy;
- 8.4.2 keep the Premises free of weeds and keep any vegetation, lawns or garden on the Premises maintained in an attractive state;
- 8.4.3 arrange the removal of any graffiti from any surface within the Premises; and
- 8.4.4 at its cost, arrange for an annual pest inspection to be carried out with respect to the Premises by a licensed pest control company, and must provide the Council with a copy of the annual pest inspection report within 14 days of receiving the report from the relevant company.

9. ENVIRONMENT

9.1 Environmental obligations

- 9.1.1 The Lessee must not do anything that causes Contamination or is likely to cause Contamination to the Premises or the Environment in contravention of any Environmental Law.
- 9.1.2 The Lessee must perform at its cost any environmental remediation works required as a result of a breach by the Lessee of this clause.

9.2 Indemnity

Without limiting clause 19, the Lessee indemnifies the Council against any claims for any loss as a result of or contributed to by any breach of an Environmental Law by the Lessee.

9.3 Termination

This clause 9 survives termination or the expiration of this lease.

10. ASSIGNMENT, SUBLETTING AND HIRING OUT

10.1 Subletting, hiring out and parting with possession

10.1.1 The Lessee acknowledges and agrees that the Lessee must (to the extent applicable and where practicable to do so) use reasonable endeavours to make the Premises and the Licence Area available (including by sub-leasing or casual hiring) for use during the Term by non-for-profit community groups and organisations when not in use by the Lessee.

10.1.2 The Lessee further acknowledges and agrees:

10.1.2.1 Council will direct any enquires from any non-for-profit community organisations and groups to the Lessee to manage these requests.

10.1.2.2 The Lessee must provide a contact person for managing enquiries for use of the improvements and maintain a register of the requests including details of available use (including names, dates and times).

10.1.2.3 That the fees charged for any sublease or hiring out of the Premises or Licence Area under this clause must be consistent with the Council's relevant leasing and licensing policies, and must be proportionate to the times of use granted and the Lessee's own fees and costs, and not for the purpose of making a profit.

10.1.2.4 If requested by Council the Lessee must meet with Council (but not more frequently than once a year) to review the register of the requests (including sub-leasing and hiring arrangement) and evaluate the details of available use.

10.1.2.5 If Council (acting reasonably) is of the view that the Lessee has not made the Premises or Licence Area sufficiently available as required by this clause, the Council may require

the Lessee to submit a plan to increase the level of community access.

- 10.1.2.6 It will be a breach of this Lease (after notice) if the Lessee fails to submit a plan or, after submitting the plan, fails to comply with the plan required to give effect to this condition.

10.2 Assignment

- 10.2.1 The Lessee may only assign or sublease or otherwise part possession with the Premises with the consent of the Council, which consent may be granted at the Council's discretion and subject to any conditions that the Council sees fit.
- 10.2.2 If the Lessee requests that the Council consent to any assignment, transfer or other dealing the Lessee must comply with Council's procedural requirements for dealing with the request.

10.3 Costs

The Lessee and the Council will bear its own costs incurred (including the costs of any consultant or any legal fees) in relation to any dealing with the Premises, including in considering whether or not to grant consent under this clause.

11. LESSEE GOVERNANCE

Annually, on each anniversary of the Commencement Date during the Term, the Lessee must provide to the Council a copy of the Lessee's annual reports (including minutes and financial reports), maintenance reports and subletting agreements, if requested by the Council.

12. COUNCIL'S OBLIGATIONS AND RIGHTS

12.1 Quiet enjoyment

Subject to the Council's rights and to the Lessee complying with the Lessee's obligations under this lease, the Lessee may occupy the Premises during the Term without interference from the Council.

12.2 Right to enter

The Council may (except in an emergency when no notice is required) enter the Premises after giving the Lessee 14 days' notice:

- 12.2.1 to see the state of repair of the Premises;
- 12.2.2 to do repairs to the Premises or the Building or other works which cannot reasonably be done unless the Council enters the Premises;
- 12.2.3 to do anything the Council must or may do under this lease or must do under any Legislation or to satisfy the requirements of any Statutory Authority; and
- 12.2.4 to show prospective lessees through the Premises.

12.3 Emergencies

In an emergency the Council may:

- 12.3.1 close the Premises or Building; and
- 12.3.2 prevent the Lessee from entering the Premises or Building.

12.4 Works and restrictions

12.4.1 The Council may:

- 12.4.1.1 install, use, maintain, repair, alter, and interrupt Services;
- 12.4.1.2 carry out works on the Park Lands or Building (including extensions, renovations and refurbishment); and
- 12.4.1.3 close (temporarily or permanently) and restrict access to any part of the Park Lands.

12.4.2 The Council must (except in an emergency) take reasonable steps to minimise interference with the Lessee's use and occupation of the Premises and Licence Area, and where practical provide reasonable notice to the Lessee of any proposed activities contemplated by clause 12.4.1.

12.5 Right to rectify

The Council may at the Lessee's cost do anything which the Lessee should have done under this lease but which the Lessee has not done or which the Council reasonably considers the Lessee has not done properly.

12.6 Park Lands Events

- 12.6.1 The Lessee acknowledges and agrees that (subject to its location in the Park Lands) the Premises may not be available for use and occupation as a result of public or special events to be held in the Park Lands.
- 12.6.2 The Lessee may not make any claim against the Council arising from or in connection with any public or special events or the Premises not being available for the Lessee's use and occupation.
- 12.6.3 The Lessee will not be required to make any payments on account of instalments of the Lease Fee for the period the Premises is not

available for use by the Lessee as a consequence of any public or special event.

13. TERMINATION FOR DAMAGE OR DESTRUCTION

- 13.1 If the Premises is destroyed or is damaged so that the Premises is unfit for the Lessee's use then within three (3) months after the damage or destruction occurs, the Council must give the Lessee a notice either:
- 13.1.1 Terminating this Lease (on a date at least one (1) month after the Council gives notice); or
 - 13.1.2 Advising the Lessee that the Council intends to repair any building forming part of the Premises so that the Lessee can occupy and use the Premises.
- 13.2 If the Council gives a notice under clause 13.1.2 but does not carry out the intention within a reasonable time, the Lessee may give notice to the Council that the Lessee intends to end the Lease if the Council does not make the Premises accessible and fit for use and occupation by the Lessee within a reasonable time (having regard to the nature of the required work).
- 13.3 If the Council does not comply with the Lessee's notice under clause 13.2 the Lessee may terminate this Lease by giving the Council not less than one (1) months' notice without any Claim by the Lessee against the Council.

14. REDEVELOPMENT, ASSET RATIONALISATION AND DEMOLITION

- 14.1 If as part of any redevelopment, asset rationalisation or other project conducted by the Council or a Statutory Authority that includes the Park Lands, or for any other reason, the Council or a Statutory Authority wishes to demolish or acquire vacant possession of the Premises or any part of the Premises, then the Council may terminate this lease with six (6) months' notice to the Lessee.

15. DISPUTES RESOLUTION

15.1 Dispute

- 15.1.1 A party to a Dispute must comply with this clause before starting arbitration or court proceedings (except proceedings for interlocutory relief).

15.2 Notice of Dispute

- 15.2.1 A party raising a Dispute must give the other parties to the Dispute notice setting out details of the Dispute.

15.3 Effort to resolve

- 15.3.1 For twenty (20) Business Days after the notice in clause 15.2, each party to the Dispute must use reasonable efforts to resolve the Dispute.

15.4 Mediator

- 15.4.1 If the parties cannot resolve the Dispute under clause 15.3 within that period, they must refer the Dispute to a mediator.
- 15.4.2 If, within a further twenty (20) Business Days, the parties to the Dispute do not agree on a mediator, a party to the Dispute may ask the chairman of the Resolving Body to appoint a mediator.
- 15.4.3 The mediator assists in negotiating a resolution of the Dispute. A mediator may not bind a party unless the party agrees in writing.
- 15.4.4 The mediation ends if the Dispute is not resolved within twenty (20) Business Days after the mediator's appointment.

15.5 Confidentiality

- 15.5.1 Each party:
 - 15.5.1.1 must keep confidential any information or documents disclosed in the dispute resolution process; and
 - 15.5.1.2 may use that information or those documents only to try to resolve the Dispute.

15.6 Cost of dispute

- 15.6.1 Each party to a Dispute must pay its own costs of complying with this clause.

15.7 Breach of dispute clause

- 15.7.1 If a party to a Dispute breaches this clause, the other parties to the Dispute do not have to comply with this clause in relation to the Dispute.

16. RENEWAL

- 16.1 If a right of renewal or first right of renewal is specified in Item 3 of the Schedule and the Lessee wishes to exercise that right of renewal, then the Lessee must give a written notice to the Council not less than 6 months and not more than 12 months before the expiry of the Initial Term stating it wishes to renew this lease for the period specified in Item 3 of the Schedule. If such notice is given the Council must renew this lease for the first Renewal Term on the terms in this lease (except this subclause) commencing immediately after the Initial Term expires.
- 16.2 If a second right of renewal is specified in Item 3 of the Schedule and the Lessee wishes to exercise that right of renewal, then the Lessee must give a written notice to the Council not less than 6 months and not more than 12 months before the expiry of the first Renewal Term stating it wishes to renew this lease for the period specified in Item 3 of the Schedule. If such notice is given the Council must renew this lease for the second Renewal Term on the terms in this lease (except this subclause and the previous subclause) commencing immediately after the first Renewal Term expires.
- 16.3 The Lessee is not entitled to renew this lease if:
- 16.3.1 the Lessee is in breach of this lease at the time of giving that notice; or
 - 16.3.2 the Lessee is in breach or commits a breach of this lease after giving that notice but before the commencement of the first or second Renewal Term (as applicable).

17. RIGHTS AND OBLIGATIONS ON EXPIRY

17.1 Expiry

This lease comes to an end at midnight on the last day of the Term unless it is terminated earlier by the Council or the Lessee under this lease.

17.2 Handover of possession

Before this lease comes to an end, the Lessee must (if required to do so by the Council):

- 17.2.1 remove all of the Lessee's Equipment and repair any damage caused by such removal;
- 17.2.2 no later than one (1) month before this lease comes to an end, provide the Council with a written summary of all alterations and additions the Lessee made to the Premises, whether those alterations and additions were authorised by the Council or not;
- 17.2.3 remove and reinstate any alterations or additions made to the Premises by the Lessee unless otherwise specified by the Council;
- 17.2.4 refurbish the Premises as required under clause 8.3; and

- 17.2.5 complete any repairs which the Lessee is obliged to carry out under this lease.

17.3 Abandoned goods

If, when this lease comes to an end, the Lessee leaves any goods or equipment at the Premises, then the Council may deal with and dispose of those goods at its discretion.

17.4 Holding over

If, with the Council's consent, the Lessee continues to occupy the Premises after the end of this lease, the Lessee does so under a monthly tenancy which:

- 17.4.1 either party may terminate on one month's notice given at any time; and
- 17.4.2 is on the same terms as this lease.

18. BREACH

18.1 Council's rights on breach

- 18.1.1 The Council may come onto the Premises and remedy a breach of this lease without notice:
 - 18.1.1.1 in an emergency; or
 - 18.1.1.2 if the Lessee breaches any provision of this lease and fails to remedy the breach within 14 days after receiving notice requiring it to do so.
- 18.1.2 The Lessee must pay or reimburse the Council on demand for all costs of remedying the breach.

18.2 Breach and re-entry

If:

- 18.2.1 the Lessee fails to pay a sum of money when due and fails to remedy that failure within 14 days after receiving notice requiring it to do so; or
- 18.2.2 the Lessee breaches any other provision of this lease and fails to remedy the breach within 14 days after receiving notice requiring it to do so;

then despite any other clause of this lease, the Council:

- 18.2.3 may terminate this lease and re-enter and repossess the Premises, without prejudice to its other rights; and
- 18.2.4 is discharged from any claim by or obligation to the Lessee under this lease.

18.3 Rights of Council not limited

A power or right of the Council under this lease or at law resulting from a breach or repudiation of this lease by the Lessee, or the exercise of such power or right, does not limit the Council's powers or rights.

18.4 Interest on overdue amounts

If the Lessee does not pay an amount when it is due, the Lessee must pay interest on that amount on demand from when the amount becomes due until it is paid in full. Interest is calculated on outstanding daily balances at the Default Rate.

19. INDEMNITY AND RELEASE

19.1 Risk

The Lessee occupies and uses the Premises at the Lessee's risk.

19.2 Indemnity

The Lessee is liable for and must indemnify the Council against all actions, liabilities, penalties, claims or demands for any loss, damage, injury or death incurred or suffered directly or indirectly including in connection with:

19.2.1 any act or omission of the Lessee;

19.2.2 the use of the Premises by the Lessee or otherwise relating to the Premises; or

19.2.3 a breach of this lease by the Lessee.

19.3 Release

The Lessee releases the Council from all actions, liabilities, penalties, claims or demands for any damage, loss, injury or death occurring in the Premises or the Building except to the extent that they are caused by the Council's negligence.

19.4 Indemnities are independent

Each indemnity is independent from the Lessee's other obligations and continues during this lease and after this lease ends.

20. GOODS AND SERVICES TAX

20.1 If the Council is liable to pay GST in connection with a supply under this lease then:

20.1.1 the Agreed Consideration for that supply is exclusive of GST;

20.1.2 the Council may increase the Agreed Consideration or the relevant part of the Agreed Consideration by the GST Rate; and

20.1.3 the Lessee must pay the increased Agreed Consideration on the due date for payment by the Lessee of the Agreed Consideration.

- 20.2 Where the Agreed Consideration is increased under this clause, the Council must, on or before the date on which the Agreed Consideration is payable, issue a tax invoice to the Lessee.
- 20.3 If the Lessee breaches this clause and as a result the Council becomes liable for penalties or interest for late payment of GST, then the Lessee must pay the Council on demand an amount equal to the penalties and interest.

21. RESUMPTION

The Council may terminate this lease by giving at least six (6) months' written notice to the Lessee if the Council receives notice of resumption or acquisition of the Premises or the Building or the Park Lands (or any part of the Building or the Park Lands affecting the Premises) from or by any Statutory Authority governmental or semi-governmental body.

22. MISCELLANEOUS

22.1 Entire agreement

This lease constitutes the entire agreement between the parties about the Premises and supersedes any prior understanding, agreement, condition, warranty, indemnity or representation about the Premises.

22.2 Waiver

If the Council accepts or waives any breach by the Lessee, that acceptance or waiver cannot be taken as an acceptance or waiver of any future breach of the same obligation or of any other obligation under this lease.

22.3 Exercise of power

- 22.3.1 The failure, delay, relaxation or indulgence by a party in exercising a power or right under this lease is not a waiver of that power or right.
- 22.3.2 An exercise of a power or right under this lease does not preclude a further exercise of it or the exercise of another right or power.

23. NOTICE

A notice, demand, consent, approval or communication under this lease (**Notice**) must be in writing and will be sufficiently given if sent via email to either parties' nominated email address or if posted by pre-paid post to the last known address of either party.

24. COSTS

On request, the Lessee must pay or reimburse to the Council all legal and other costs incurred by the Council in consequence of any actual or threatened breach by the Lessee under this lease or in exercising or enforcing (or attempting to do so) any rights or remedies of the Council under this lease or at law or otherwise arising in consequence of any actual or threatened breach by the Lessee.

25. LICENCE

For the purpose of this clause:

'buildings, fixtures, fittings or structures' includes all drains, pipes, fencing, goal posts, manholes, reticulation equipment, all electrical equipment (including floodlights) and similar services (and in cases where tennis courts form the whole or part of the Licence Area will also include all court surfaces, perimeter fencing, net posts and perimeter access gates).

25.1 Grant of Licence

The Council grants to the Lessee a licence during the Term to use the Licence Area for the Licence Area Permitted Use during the Times of Use.

25.2 Term of Licence

The Licence will (while the Lessee named in this lease is the lessee in occupation of the Premises) continue (subject to this clause) until the end of the Term or the sooner surrender or determination of this lease.

25.3 Licence Fee

25.3.1 The Lessee must pay the Licence Fee by equal annual instalments in advance on the Commencement Date and then on 1 July during each year of the Term.

25.3.2 If the Commencement Date is not 1 July, then the first and last payment will be adjusted based on the number of days from the Commencement Date to 30 June next and the number of days in the relevant year.

25.3.3 The Licence Fee is reviewed annually in accordance with Item 5A of the Schedule by the Council as part of the review of Council's schedule of fees and charges for the Park Lands.

25.4 Licence Area Permitted Use

The Lessee must not use or permit the Licence Area to be used other than for the Licence Area Permitted Use and only during the Times of Use.

25.5 Rates and utilities

25.5.1 The Lessee must pay or reimburse the Council for all rates, taxes, levies or other charges (including Council rates assessed by the Council as a Statutory Authority) arising from the grant of this licence or in respect of the Licence Area.

25.5.2 The Lessee must pay or reimburse the Council as and when due for payment or if required by the Council then within seven (7) days of demand all costs, fees and charges for the provision of:

25.5.2.1 electricity, water, gas, oil and other energy or fuels supplied to and consumed in the Licence Area; and

25.5.2.2 telephone, facsimile and other communication services, waste disposal in respect of the Licence Area and all other utility services supplied to or consumed in or on in respect of the Licence Area;

whether supplied by the Council or any other person.

25.6 Insurance

The Lessee must ensure that any insurance policies required to be effected and maintained by the Lessee under clause 7 of this lease extend (to the extent applicable) to cover the Licence Area, the use of the Licence Area and any buildings, fixtures, fittings or structures erected or placed on the Licence Area.

25.7 No assignment or subletting

The Lessee must not assign, transfer, sublicense or otherwise deal with the Lessee's rights under this Licence without the consent of the Council.

25.8 Improvements

25.8.1 The Lessee must not erect, fix or place any buildings, fixtures, fittings or structures in, on or under any part of the Licence Area without the consent of the Council.

25.8.2 Any buildings, fixtures, fittings or structures erected, fixed or placed (by whatever means) upon the Licence Area will unless otherwise agreed remain until the end of the term of this licence the property of the Lessee but may not be removed from the Licence Area without the consent of the Council.

25.9 Maintenance of improvements

The Lessee must maintain and repair any buildings, fixtures, fittings or structures erected fixed or placed in, on or under the Licence Area in good and safe repair and condition as determined by Council.

25.10 Events on Park Lands within Licence Area

25.10.1 Council may (in accordance with its events management policies (as amended from time to time)) grant approval to others to hold events within the Licence Area on terms determined by the Council.

25.10.2 Subject to clause 25.10.3, the Lessee may not make any claim for any loss or interruption arising from any such approval or being required to relocate to an alternate licence area for the duration of the event.

25.10.3 Where the event to be held in the Park Lands is proposed by Council (Council Event) and that Council Event will restrict or

prevent the Lessee's occupation and use of the Licence Area, the Council must:

25.10.3.1 occasion to the Lessee as little disturbance and damage as is practicable and provide 6 months' notice of any Council Event;

25.10.3.2 keep and maintain the Licence Area in good condition and repair and promptly rectify any damage to the Licence Area during the Council Event; and

25.10.3.3 repair any damage to the Licence Area to restore and make good any damage to the condition existing prior to the Council Event.

25.10.4 The Lessee will not be required to make any payments on account of instalments of Lease and Licence Fees for the period the Licence Area is not available for use by the Lessee as a consequence of any Council Event.

25.10.5 The Lessee acknowledges and agrees that this clause does not apply to impose any obligations on the Council or confer any rights upon the Lessee if any public, major or special event in or affecting the Park Lands and the Licence Area is not a Council Event.

25.11 To obey policies and direction

The Lessee must comply with and cause to be complied with all Council policies, directions, rules and by-laws from time to time regarding the Licence Area or the Licence Area Permitted Use including Council's "Adelaide Park Lands Leasing and Licensing" policy (or any update or replacement policy (from time to time)).

25.12 Public access and membership

The Lessee must allow unrestricted public access to those playing fields and surfaces within the Licence Area at all times when the Lessee is not using them.

25.13 Relocation

The Council will have the right where in the opinion of the Council there exists a valid commercial reason so to do at any time during the duration of this Licence to relocate the Lessee to another location on the Park Lands provided that the Council will have given not less than six (6) months' notice of its intention to the Lessee.

25.14 Nature of licence

The rights granted by the licence conditions in this clause do not create in or confer upon the Lessee any tenancy or any estate or interest in the Licence Area. The rights granted do not confer upon the Lessee any right of exclusive use or occupation and the Council may from time to time exercise all rights

which may include the use and enjoyment of the whole or any part of the Licence Area.

25.15 No warranty

The Council makes no warranty or representation regarding the suitability of the Licence Area including any buildings, fixtures, fittings or structures in, on or under any part of the Licence Area (whether erected fixed or placed by the Council, any previous licence holder or any other person) for the Licence Area Permitted Use or any other purpose.

25.16 Interpretation

Unless the contrary intention appears:

25.16.1 a breach of the terms of this Licence will be an event of default under this lease; and

25.16.2 all of the "Lessee's covenants" and the Council's rights in this lease are deemed to be incorporated into this Licence as if they were specifically set out in this Licence (including any terms or requirements for Council's consent) so that "Premises" in the lease terms will mean "Licence Area" (as defined in this clause) and the Lessee agrees to observe and perform all of the "Lessee's" covenants and be subject to the Council's rights in relation to the Licence Area.

EXECUTED as an agreement on this day (date)

EXECUTED by an authorised representative of **THE CORPORATION OF THE CITY OF ADELAIDE** under delegation pursuant to section 44 of the Local Government Act 1999:

.....
Signature of Authorised Representative

.....
Signature of Witness

.....
Name of Authorised Representative (print)

.....
Name of Witness (print)

.....
Position of Authorised Representative (print)

Signed for TRUSTEES OF EDMUND RICE EDUCATION AUSTRALIA (CBC Adelaide) by its authorised delegates:)
)
)

.....
Signature of Authorised Representative

.....
Signature of Authorised Representative

.....
Name

.....
Name

Annexure A Lease and Licence Plans



Portion of King Rodney Park / Ityamai-itpina (Park 15)



Portion of Carriageway Park / Tuthangga (Park 17)

Annexure B Maintenance Schedule

To be included

Kadaltilla

Adelaide Park Lands Authority

Adelaide Park Lands Dry Area Regulation Review

**Wednesday 30 April 2025
Board Meeting**

Author: Sarah Gilmour
Associate Director Park
Lands, Policy & Sustainability

Public

Purpose

The purpose of this report is to inform the Kadaltilla / Adelaide Park Lands Authority of the findings and recommendations of the Adelaide Park Lands Dry Area Regulation Evaluation report.

In 2014, the Adelaide Park Lands Dry Area Regulation (the Regulation) was established as a trial to address the impacts of alcohol-related behaviour in the southern Park Lands, and to reduce reported amenity impacts on the community.

In 2021, Blue Gum Park / Kurangga (Park 20) and Veale Park / Walyu Yarta (Park 21) became Dry Areas 24 hours a day, seven days a week. The Dry Area was established in response to the ongoing impact on residential amenity in this location due to excessive alcohol consumption by large groups and associated challenging behaviours.

Since the introduction of the Adelaide Park Lands Dry Area Regulation, no comprehensive evaluation has been conducted of its effectiveness and impact on reducing alcohol-related harm and crime.

On 14 November 2023, Council resolved to request an 18-month extension to the existing Adelaide Park Land Dry Areas until 22 June 2025. This extension was conditional on the establishment of a monitoring and evaluation process for the Adelaide Park Lands Dry Areas by the State Government, and would include:

- A review of the data and outcomes related to the continuation of the Dry Area to be conducted during 2024 and presented to Council in early 2025, with proposals for alternative measures to be established.
- A report on the wrap-around services delivered by the State Government in support of the Dry Area.

The CoA engaged Urbis (consultants) to conduct an independent assessment, and nine recommended actions are made to support the effective implementation of the Regulation and better community outcomes. The responsibility for actions extends to State Government and other Agencies.

On Tuesday 8 April 2025, Council authorised the Chief Executive Officer, or delegate to seek a 3-year extension of the existing Adelaide Park Lands Dry Areas until 22 June 2028. The CoA will work with the State Government to develop a plan for implementing the recommended actions to commence from 2025/26.

Recommendation

That the Kadaltilla / Adelaide Park Lands Authority:

1. Notes the Adelaide Park Lands Dry Area Regulation Evaluation report as contained in **Attachment A to Item 6.3** on the Agenda for the meeting of the Board of Kadaltilla/ Adelaide Park Lands Authority held on 30 April 2025.

2. Notes the decision of Council to apply to the State Government to extend the current arrangements for the Adelaide Park Lands Dry Areas 1 for a further three years until 22 June 2028.
 3. Notes the decision of Council to request that the State Government work with the Administration to prioritise the development of a plan for implementing the recommended actions as contained in the Adelaide Park Lands Dry Area Regulation Evaluation commencing in 2025/26.
-

Implications

Adelaide Park Lands Management Strategy 2015-2025	Adelaide Park Lands Management Strategy 2015-2025 Not directly applicable.
2023-2028 Strategic Plan	Kadaltilla / Adelaide Park Lands Authority 2023-2028 Strategic Plan Strategic Plan Alignment – Expert Advice 4.1 Provide advice on plans, projects, and policies for the Adelaide Park Lands 4.2 Engage with City of Adelaide and State Government including input into State Government initiatives
City of Adelaide Strategies	Strategic Alignment: Our Community Objective: Support our communities to thrive. Outcome: 1. Create safe, inclusive and healthy places for our community.
Policy	Not as a result of this report.
Consultation	Semi-structured interviews were conducted with 26 stakeholders, including those from Aboriginal Community Controlled Organisations (ACCOs), CoA, community organisations, the South Australian Government, South Australian Police, traders, and two people with lived experience. Given the recent 2023 engagement with residents, another Our Adelaide survey was not conducted. The 2023 and 2020 public consultations, including a resident requested follow-up conversation, were included as part of the evaluation.
Resource	Not as a result of this report.
Risk / Legal / Legislative	This report relates to the Adelaide Park Lands Dry Area Regulation as an instrument under the <i>Liquor Licensing Act 1997 (SA)</i> .
Design	https://www.odasa.sa.gov.au/design-review/ Not as a result of this report.
Opportunities	The Adelaide Park Lands Dry Area Regulation is one regulatory tool to support community safety and wellbeing outcomes. City of Adelaide will continue to work with the Safety and Wellbeing Taskforce to pursue strategies to address the drivers that influence excessive alcohol consumption.
City of Adelaide Budget Allocation	\$115,390 sourced from existing budgets once the Taskforce advised it would not lead the evaluation
Capital Infrastructure Projects	Not applicable

Life of Project, Service, Initiative or (Expectancy of) Asset	Not applicable
Ongoing Costs (eg maintenance cost)	Not applicable
Other Funding Sources	Not applicable

1. Background

- 1.1. In 2014, the Adelaide Park Lands Dry Area Regulation (Regulation) was established as a trial to address the impacts of alcohol-related behaviour in the southern Park Lands, and to reduce reported amenity impacts on the community.
- 1.2. In 2021, Blue Gum Park / Kurangga (Park 20) and Veale Park / Walyu Yarta (Park 21) became Dry Areas 24 hours a day, seven days a week. The Dry Area was established in response to ongoing impact to residential amenity in this location due to excessive alcohol consumptions by large groups and associated challenging behaviours.
- 1.3. On 14 November 2023, Council resolved to request an 18-month extension to the existing Adelaide Park Land Areas until 22 June 2025. This extension was conditional on the establishment of a monitoring and evaluation process for the Adelaide Park Lands Dry Areas by the State Government, as part of the approval through the Safety and Wellbeing Taskforce and would include:
 - 1.3.1. A review of the data and outcomes related to the continuation of the Dry Area to be conducted over the next 12 months and presented to Council, with proposals for alternative measures to be established.
 - 1.3.2. A report on the wrap-around services delivered by State Government in support of the dry zone.
- 1.4. The restrictions outlined above are depicted spatially in Figure 1:

City of Adelaide Dry Zone Map

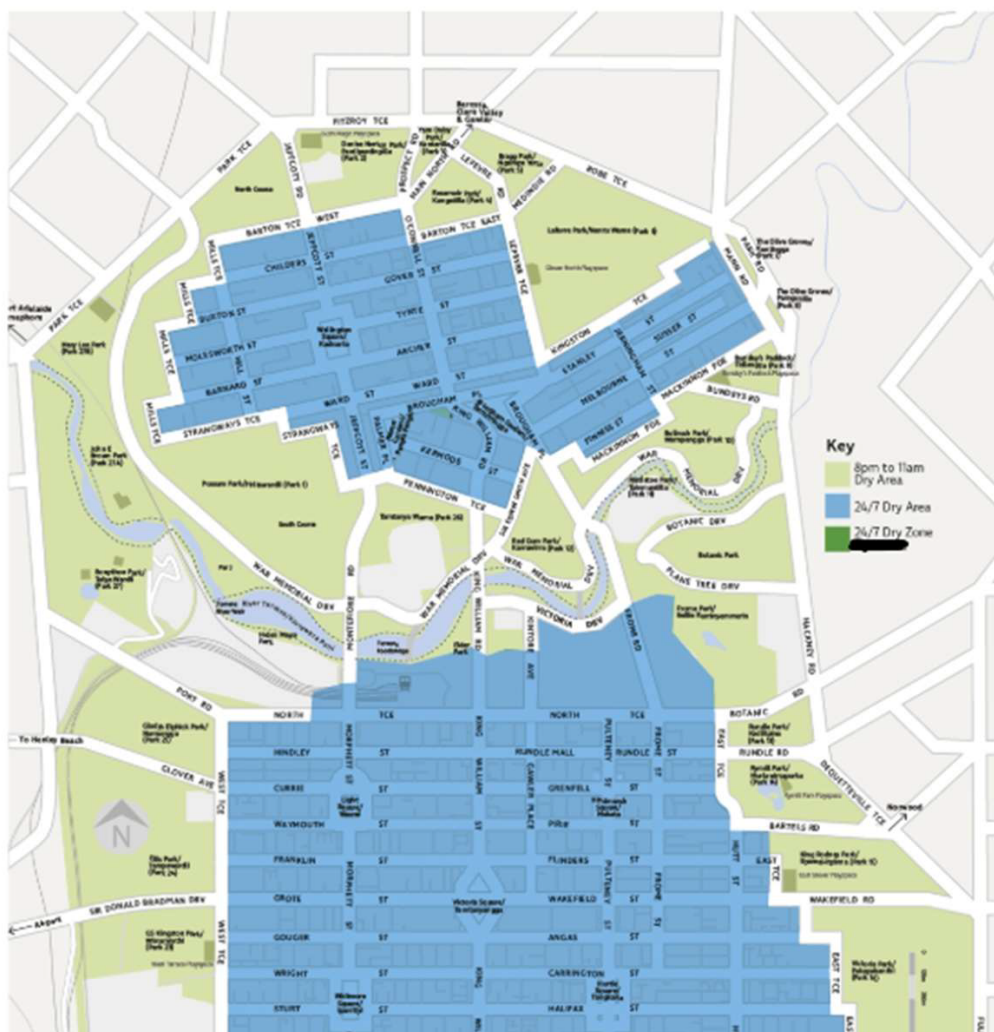


Figure 1: Adelaide Park Lands Dry Areas as at 1 April 2025

- 1.5. On 5 December 2023 the Safety and Wellbeing Taskforce approved the CoA's request that the Safety and Wellbeing Taskforce lead the evaluation of the Adelaide Park Lands Dry Area Regulations.

- 1.6. On 15 April 2024 the Department of Human Services (DHS) advised the City of Adelaide that after thorough consideration it had determined that the scope of the evaluation extended beyond the remit of the Taskforce.

2. Project purpose and methodology

- 2.1. The CoA engaged Urbis (consultants) to complete an independent assessment to determine the effectiveness and impact of the Regulation, and to provide recommendations about their continuation and potential alternative measures that could support outcomes for all community members and stakeholders who use the Adelaide Park Lands.
- 2.2. The evaluation assessed the:
 - 2.2.1. Implementation of the Regulation (i.e. the strategies used in the implementation, the effectiveness of these strategies, the appropriateness of the Dry Area time span and the barriers and enablers to successful implementation), focusing on the previous 12 months.
 - 2.2.2. Effectiveness of the Regulation in reducing alcohol related crime and harm and improving public amenity.
 - 2.2.3. Impact of the Regulation on a range of target groups, including residents (based on existing information), traders near the Adelaide Park Lands, local health and community workers, SA Police (SAPOL), SA Government service providers, Aboriginal and Torres Strait Islander people, people experiencing homelessness and rough sleeping, young people (18-25 years of age), and employees working in the Adelaide Park Lands.
 - 2.2.4. The current wrap-around services delivered by the SA Government and social service organisations in response to the Dry Areas.
- 2.3. The evaluation was undertaken over a four-month period from October 2024 to February 2025 This included semi structured interviews with 26 stakeholders and 2 people with lived experience, analysis of documentation and data relating to the Regulation, analysis of the 2023 and 2020 CoA Your Say public engagements, and desktop mapping of the service environment in response to Dry Areas.

3. Evaluation findings

- 3.1. The evaluation report is provided in **Attachment A**. The key findings of the evaluation are divided into four evaluation domains and are as follows:
 - 3.1.1. Implementation of the Regulation
 - 3.1.1.1. The Regulation has been implemented well. There is thought to be good public awareness about the Regulation, although some groups, such as young people and visitors, may be less knowledgeable about specific bans.
 - 3.1.1.2. The Regulation is an important 'tool' for intervening and reducing alcohol-related harm and crime in the Adelaide Park Lands. The enforcement approach adopted by SA Police is valued with some consideration of the effectiveness tipping alcohol out as an intervention measure.
 - 3.1.1.3. Enablers for successfully implementing the Regulation include the approach of SA Police; interagency collaboration and having culturally safe gathering places.
 - 3.1.1.4. Two potential barriers to effective implementation of the Regulation are appropriate service support and awareness of the Regulation among community members.
 - 3.1.1.5. There are mixed views about the appropriateness of the Dry Area time span to meet the Dry Area objectives. Most people interviewed preferred the 8pm to 11am restriction as a balanced approach.
 - 3.1.2. Effectiveness of the Regulation
 - 3.1.2.1. There is insufficient quantitative data available to demonstrate the Regulation's efficacy with inconsistent data collection and sharing amongst agencies since 2014 making it difficult to assess the Regulation's effectiveness.
 - 3.1.2.2. There are mixed views about the extent to which the Regulation helps to reduce alcohol-related harm and crime and improve public amenity.
 - 3.1.2.3. The Regulation alone are insufficient to reduce alcohol-related harm and crime in the Park Lands, which will persist until the underlying drivers related to substance use, health, housing and employment are addressed.

3.1.2.4. The ability to responsibly consume alcohol in the Adelaide Park Lands is viewed as important for upholding the personal rights of residents and visitors.

3.1.3. Impact of the Regulation

3.1.3.1. There is concern among some stakeholders that the Regulation disproportionately impacts marginalised communities, including people experiencing homelessness and those from remote communities.

3.1.3.2. Most stakeholders agreed the removal of the Regulation without service reform could have a detrimental impact on the health of individuals and the experience of the broader community. The role of the Regulation to intervene and de-escalate problematic drinking was emphasised and valued.

3.1.3.3. The Regulation provide an increased sense of safety for some stakeholders, including traders, CoA employees and residents by allowing SA Police to manage alcohol consumption and mitigate behaviours that impact public perception of safety.

3.1.4. Service Landscape

3.1.4.1. There is a range of specialist services to support people experiencing problems with alcohol and drug use in the City of Adelaide.

3.1.4.2. The Regulation relies on resourcing for services to meet demand in response to the Adelaide Park Lands Dry Areas. The service response after hours tends to be less person centred, trauma informed, and culturally safe.

3.1.4.3. Challenges can be experienced by people seeking to access appropriate services and supports for their needs.

3.1.4.4. Future approaches should provide culturally safe, wrap-around support with a service response that improves access to services including alcohol and other drug services and supports, housing and safe spaces, and services that operate after hours.

4. Recommended actions

4.1. There are nine recommended actions arising from the evaluation to support the effective implementation of the Regulation and better outcomes. Some of the recommendations have resource implications for State Government Agencies.

4.2. The City of Adelaide has met with relevant State Government agencies to share the findings and recommendations, and to discuss policy and resourcing implication.

4.3. Recommended the following actions, organised under four themes:

4.3.1. Regulation continuation

4.3.1.1. Extend the current Regulation for a further three years. This will provide sufficient time for the development of a robust Data Strategy. Any decision to extend the Regulation beyond this should be based on a thorough evaluation.

4.3.1.2. Assess lifting the 24/7 ban in Area 2 (Parks 20 and 21) to be consistent with the Restrictions in Area 1 (8pm to 11am), once data collection methods are well established.

4.3.2. Strengthen Regulation implementation

4.3.2.1. Develop and implement clear guidelines and protocols for enforcing the Regulations to ensure consistency and minimise biases.

4.3.2.2. Ensure SA Police responses are person-centred, relational and culturally safe, and that these responses are scaled as needed, including on weeknights and weekends and during times of high demand.

4.3.2.3. Develop a public awareness strategy about the Regulation and services available. A refreshed awareness strategy should consider use of signage, Aboriginal language and include promotion of specialist services (e.g. youth services, Aboriginal-led services).

4.3.3. Decision-making informed by robust data and evaluation

4.3.3.1. Develop a Data Strategy to enhance data collection arrangements and effectively track the impact of the Regulation and other complementary strategies over time.

- 4.3.3.2. Conduct an evaluation of the implementation and effectiveness of the Regulation and supporting strategies, commencing at least one year before expiration.
- 4.3.4. Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes.
 - 4.3.4.1. In close collaboration with community services and Aboriginal Community Controlled Organisations, further investigate the design and delivery of tailored and intensive wrap-around support services to better support people who access the Adelaide Park Lands experiencing challenges related to alcohol and other drugs, homelessness and chronic health and wellbeing issues. This should include assertive outreach, support services after hours and on weekends, and culturally appropriate and safe services for Aboriginal rural and remote visitors including appropriate in-language services.
 - 4.3.4.2. Co-design with Kaura Elders and the local community, a culturally safe gathering place for Aboriginal people from rural and remote areas. The gathering place should provide facilities for visitors and facilitate connections with specialist services. The space should be run and managed by Aboriginal organisations in ongoing partnership with the Kaurna community.

5. Next Steps

- 5.1. On 8 April 2025 Council approved for the Administration to seek an extension to the Adelaide Park Lands Dry Area Regulations for 3 years until 22 June 2028. The process for requesting an extension is:
 - 5.1.1. The Chief Executive Officer applies to State Government via Consumer and Business Services and the Commission for Liquor and Gambling.
 - 5.1.2. The Liquor and Gambling Commissioner will review the application and make a recommendation to the Minister for Consumer and Business Affairs.
 - 5.1.3. If approved by the Minister, the Dry Area Regulation is made by public notice in the Government Gazette.
- 5.2. Should an extension to the Adelaide Park Lands Dry Area Regulation be approved, Administration will:
 - 5.2.1. Request that the State Government work with the CoA to prioritise the development of a plan for the implementation of the actions as contained in the Adelaide Park Lands Dry Area Regulation Evaluation.
 - 5.2.2. Advise engagement participants of the outcome of the Adelaide Park Lands Dry Area Regulation Evaluation.
 - 5.2.3. Update information on the CoA website.
 - 5.2.4. Continue to work in partnership with State Government Agencies and other stakeholders, where appropriate, to support the implementation of the recommendations.

Attachments

Attachment A - Urbis Adelaide Park Lands Dry Area Regulation Evaluation report

- END OF REPORT -

URBIS

ADELAIDE PARK LANDS DRY AREA REGULATIONS EVALUATION

Prepared for
CITY OF ADELAIDE
3 March 2025

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P0056199
Report Number	v3



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

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ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
ACCO	Aboriginal Community Controlled Organisation
APY Lands	Anangu Pitjantjatjara Yankunytjatjara
CoA	The City of Adelaide
CIR	Cox Inall Ridgeway
DASSA	Drug and Alcohol Services South Australia
DHS	Department of Human Services
MAP	Mobile Assistance Patrol
The regulations	Adelaide Park Lands Dry Area Regulations
SA	South Australia
SAAS	South Australian Ambulance Service
SACAD	South Australian Computer Aided Dispatch
SAPP	Supervised Alcohol Provision Program

EXECUTIVE SUMMARY

INTRODUCTION

The regulations

The Adelaide Park Lands (the Park Lands) are a network of 29 parks and six city squares that enclose and separate the City of Adelaide (CoA) from its suburbs. The Park Lands include a diverse range of open spaces, landscapes, community buildings, play spaces, facilities and businesses for people living in and visiting Adelaide to enjoy.

In 2014, the Adelaide Park Lands Dry Area Regulations ('the regulations') were established as a trial to address the impacts of alcohol-related behaviour in the Park Lands for the local community. The regulations make it illegal to consume alcohol or carry an open liquor container in designated Dry Areas without a permit,¹ and are in place to help CoA to manage the use of the Park Lands and provide safe and accessible spaces for all community members.

Since 2014, the regulations have been subject to three reviews and extended on multiple occasions. The designated Dry Areas are:

- Adelaide Park Lands Area 1, which has been in place since 2014, is in effect from 8.00pm to 11.00am the following day, seven days per week, covering most of the Adelaide Park Lands.
- Adelaide Park Lands Area 2, which was introduced in 2021 (City Community Services and Culture Committee, 2023) and covers Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21), is in effect for 24 hours a day, seven days a week.

Alcohol consumption in the Park Lands

Alcohol consumption in the Park Lands by different groups is driven by a range of social, cultural and economic factors. For young people and people experiencing homelessness or sleeping rough, the relative accessibility and openness of the Park Lands make it a convenient location for individuals who may not have access to private spaces in which to consume alcohol. For many Aboriginal people, including those visiting from rural and remote communities, the Parks Lands provide a gathering place for socialising, cultural connection, camping and community bonding. The consumption of alcohol in the Park Lands by Aboriginal rural and remote visitors must be understood through a historical lens. It is well established within the literature that policies and practices stemming from colonisation have ongoing impacts on patterns of alcohol consumption amongst Aboriginal people and on related police interactions.

THE EVALUATION

Aims

Urbis was engaged by CoA to conduct an evaluation of the regulations. The purpose of the evaluation was to understand the effectiveness and impact of the regulations, and to provide recommendations about their continuation and potential alternative measures that support outcomes for all community members and stakeholders. The evaluation aimed to assess:

¹ Those wishing to consume alcohol during the times that an area is designated as a dry area, including as part of an event, must apply for a liquor licence through the State Government Consumer and Business Services.

- Implementation of the regulations, including the strategies used in the implementation, the effectiveness of these strategies, the appropriateness of the Dry Area time span and the barriers and enablers to successful implementation.
- Effectiveness of the regulations in reducing alcohol-related crime and harm and improving public amenity.
- Impact of the regulations on a range of target groups, including South Australia (SA) Police, residents, traders, local health and community workers, SA Government service providers, marginalised groups and CoA staff working in the Adelaide Park Lands.
- The service landscape delivered by SA Government and social service organisations in response to the Dry Areas.

Approach

The evaluation was conducted from October 2024 to February 2025. The methodology included the collection and analysis of primary and secondary data. The findings are informed by:

- Analysis of documentation and data relating to the regulations (including previous consultation reports and first responder data).
- A desktop scan to map the service landscape in response to Dry Areas.
- Resident feedback as part of the CoA YourSAy consultation conducted September – October 2023.
- Targeted engagement with key stakeholders.

Given the recent 2023 engagement with residents, another CoA engagement poll was not conducted. The 2023 and 2020 consultation feedback from residents, including a resident requested follow-up conversation, was included as part of the analysis.

Interviews were conducted with 26 stakeholders, including those from Aboriginal Community Controlled Organisations (ACCOs), CoA, community organisations, the SA government, SA Police, and traders. Two interviews were conducted with lived experience participants.

Key project limitations included limited quantitative data available to triangulate and assess the effectiveness of the regulations, and the small number of lived experience conversations conducted due to the time of year impacting participation (predominantly organised through service providers) and the transient nature of some participants.

KEY FINDINGS

Evaluation domain	Key findings
Implementation of the regulations	▪ Overall, the regulations have been implemented well. Stakeholders agreed on clear roles and good public awareness of the regulations, though some groups, such as young people and visitors, may be less knowledgeable about specific bans. While feedback opportunities were appreciated, decision-making processes regarding the Area 2 24/7 ban – and the underpinning rationale – were sometimes unclear. ▪ The regulations are viewed as a ‘tool’ for intervening and reducing alcohol-related crime and harm in the Park Lands. Stakeholders saw the regulations as important for reducing alcohol-related crime and

Evaluation domain	Key findings
	maintaining public safety. The enforcement approach adopted by SA Police was generally considered appropriate. There was some concern about the effectiveness of tipping out alcohol as an intervention measure given individuals can easily refill their alcohol containers. ▪ Operation Paragon’s approach, inter-agency collaboration and culturally safe gathering places all support the implementation of the regulations. Operation Paragon officers prioritising support and wellbeing over punitive measures, building authentic relationships, and adapting to emerging priorities were viewed as key enablers of effective implementation. Additionally, strengths of the service system including an inter-agency collaborative approach and the availability of culturally safe gathering places were highlighted. ▪ Several barriers impact implementation of the regulations. These include resourcing constraints for SA Police and inconsistent awareness of the regulations among community members. ▪ There are mixed views about the appropriateness of the Dry Area time span to meet the objectives. Stakeholders expressed concern about the fairness and rationale behind the inconsistent alcohol ban times in the Park Lands, particularly the 24/7 bans in Area 2, arguing it disproportionately affects certain groups and complicates enforcement. Most preferred the 8pm to 11am ban as a balanced approach.
Effectiveness of the regulations	▪ There is insufficient quantitative data available to demonstrate the efficacy of the regulations. Inconsistent data collection and sharing by first responders since 2014 have made it difficult to assess the regulations’ effectiveness. As a result, stakeholders have had to rely on limited and anecdotal evidence. ▪ There are mixed views about the extent to which regulations help to reduce alcohol-related crime and harm and improve public amenity. Some stakeholders noted a reduction in alcohol-related crime and harm, while others doubted the regulations’ impact, and most agreed improvements in public amenity were likely due to relocation of marginalised groups to other areas within Adelaide. ▪ The regulations alone are insufficient to reduce alcohol-related crime and harm in the Park Lands. Stakeholders agreed alcohol-related crime and harm in the Park Lands will persist until the underlying drivers relating to substance use, health, housing, and employment were addressed.
Impact of the regulations	▪ The ability to responsibly consume alcohol in the Park Lands is viewed as important for upholding the personal rights of residents and visitors. This ability was valued by the general public, with many considering 24/7 Dry Area regulations in all areas of the Park Lands to be an infringement on personal freedoms.

Evaluation domain	Key findings
	▪ There is concern among some stakeholders that the regulations disproportionately impact marginalised communities, with many describing how people experiencing homelessness and those from remote communities may be subject to discriminatory enforcement that displaces them from essential services, further complicating their access to specialist supports. ▪ Most stakeholders agree the removal of the regulations without substantive service reform could have a detrimental impact on the health of individuals and the experience of the broader community. The role of the regulations to intervene and deescalate problematic drinking was emphasised and valued. ▪ The regulations provide an increased sense of safety for some stakeholders, including traders, CoA workers and residents, who believed the regulations enhance safety for workers and users of the Park Lands by allowing police to manage alcohol consumption and mitigate behaviours that impact public perception of safety.

Evaluation domain	Key findings
Service landscape	▪ There are a range of specialist services to support people experiencing problems with alcohol and drug use in the City of Adelaide local government area. Over 20 services were identified providing a range of health, alcohol and other drug, housing, sobering up support and Aboriginal specific care. ▪ Aboriginal rural and remote visitors to the Park Lands face particular challenges in accessing appropriate support. Rural and remote visitors are disproportionately impacted by the regulations. They have a range of support needs, but face barriers in accessing services, including a lack of services targeted to this group that are in language and culturally safe. ▪ Resourcing for services is insufficient to meet demand in response to the Park Lands Dry Areas. Insufficient resourcing of services limits the capacity of services to respond after hours and to undertake assertive outreach. This means the service response after hours tends to be less person centred, trauma informed, and culturally safe. ▪ A stronger service response is required to better support those impacted by the regulations regardless of whether the regulations are removed. The regulations themselves are not sufficient to address alcohol-related crime and harm in the Park Lands given its complex and entrenched drivers and should be supported by a more intensive, multiagency service response with culturally appropriate preventative measures and holistic wrap-around support. ▪ Future approaches should provide culturally safe, wrap-around support to meet the needs of those impacted by the regulations. Additionally, a strengthened service response would involve better access to alcohol and other drug services and supports, housing and safe spaces, and services that operate after hours.

RECOMMENDATIONS

Based on evaluation findings, there are nine recommended actions to strengthen the response to alcohol-related incidents in the Park Lands. The table overleaf sets out the recommended actions across four themes, the rationale for each action, lead organisation and potential partners, and proposed timing for implementation. The themes are:

- Regulation continuation.
- Strengthen regulation implementation.
- Decision-making informed by robust data and evaluation.
- Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes.

The recommended actions acknowledge the complex drivers of problematic alcohol consumption in the Park Lands and the need for a multiagency, partnership approach to implement meaningful change. The actions have been developed as a suite of complementary and reinforcing strategies, with a strong rationale for implementing all recommendations concurrently.

Table 1 – Recommended actions

Recommended actions	Rationale	Roles and responsibilities	Timing
Regulation continuation			
1. Extend the current regulations for a further three years.	The regulations are generally supported as a useful tool for intervening to reduce alcohol-related harm and to promote public safety. Extending the regulations for a further three years will provide sufficient time for the development and implementation of a robust Data Strategy (see recommended action 6). Any decision to extend the regulations beyond this should be based on a thorough evaluation (see recommended action 7).	Lead: Minister for Small and Family Business, Consumer and Business Affairs, and Arts/Consumer and Business Services	2025-2026
2. Assess lifting the 24/7 ban in Area 2 (Parks 20 and 21) to be consistent with the restrictions in Area 1, once the necessary data collection processes are in place (see recommendation 6 below).	A number of stakeholders including local residents have questioned the rationale of the 24/7 ban in Area 2. Any changes to the regulations should be supported by robust data collection arrangements to ensure effective tracking of the impact and efficacy of the change and to provide an evidence base to inform decision making.	Lead: Minister for Small and Family Business, Consumer and Business Affairs, and Arts/Consumer and Business Services	After data collection process is established by SA Government and operational
Strengthen implementation regulation			
3. Develop and implement clear guidelines and protocols for the enforcement of the	Responses by SA Police to alcohol-related incidents in the Park Lands may vary	Lead: Minister for Police	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
regulations to ensure consistency and minimise biases.	depending upon the officer attending, time of day, location and situation. A standardised protocol is important to ensure consistent implementation of the regulations regardless of the time of day or week and will also assist to manage stakeholder expectations.	Partners: SA Police, Safety and Wellbeing Taskforce	
4. Expand resources for Operation Paragon, the dedicated SA Police unit focused on addressing alcohol-related anti-social behaviour through a multi-agency approach, to increase the number of trained officers and to broaden the operational hours of this unit.	There is broad consensus that the relational and harm reduction focus of Operation Paragon delivers positive outcomes for those consuming alcohol in the Park Lands and to the broader community. Resource constraints limit Operation Paragon's ability to attend the Park Lands during weeknights and over the weekends. While all SA Police is responsible for enforcement of the regulations, this recommendation aims to enhance the capacity of Operation Paragon specifically, acknowledging its unique role and approach.	Lead: SA Police Partners: ACCOs and community organisations	2025-2026
5. Implement a co-design approach to develop a public awareness strategy about the regulations and services available.	Awareness of the regulations is believed to be mixed among people accessing the Park Lands, including young people and rural and remote visitors, particularly those new to Adelaide. A refreshed awareness strategy should include additional or updated signage throughout the Park Lands that indicates the time spans of Dry Areas. The strategy should also consider use of Aboriginal language and	Lead: Consumer and Business Services Partners: ACCOs, CoA and community organisations	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	include promotion of specialist services (e.g., youth services, Aboriginal-led services).		
Decision-making informed by robust data and evaluation			
6. Develop a Data Strategy to enhance data collection arrangements and to effectively track the impact of the regulations and other complementary strategies over time. This should be underpinned by a Memorandum of Understanding between relevant parties.	The current understanding of the regulations' effectiveness is limited due to a lack of comprehensive data collection over the past ten years. While qualitative data has provided valuable insights, there is a need for more quantitative data to fully assess the efficacy of the regulations and to inform decision-making about the effectiveness of other supporting strategies. Qualitative and quantitative data are crucial for triangulating findings and developing a holistic understanding of the regulations' effectiveness and impact. A robust Data Strategy will need to articulate purpose, scope and underlying research questions aligned to intended outcomes for different stakeholder groups to inform data collection arrangements and roles and responsibilities, including governance, and formalised data sharing arrangements between partner agencies. Future data collection of alcohol-related incidents in the Park Lands should consider the inclusion of basic demographic data of individuals, the time/date of incidents and exact geographic	Lead: Department of Human Services (DHS) Partners: SA Police, South Australian Ambulance Service (SAAS), Safety and Wellbeing Taskforce, CoA, community organisations and ACCOs	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	location. The Data Strategy should align with the broader Evaluation Framework.		
7. Conduct an evaluation of the implementation and effectiveness of the regulations and supporting strategies, commencing at least one year before expiration.	The regulations must be reviewed with due consideration of broader contextual factors and the range of supporting strategies in place. Future evaluations should be informed by improved data collection arrangements and a longer timeline to enable the conduct of stakeholder consultations including those with lived experience of the regulations. Future evaluations may also consider an assessment of the economic costs and benefits of the regulations in conjunction with a range of supporting strategies.	Lead: DHS Partners: Safety and Wellbeing Taskforce	At least one year before expiration 2026-2027
Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes			
8. In close collaboration with community organisations and ACCOs, further investigate the design and delivery of tailored and intensive wrap-around support services to better support people who access the Park Lands experiencing challenges related to alcohol and other drugs, homelessness and chronic health and wellbeing issues. This should include:	While there are a range of alcohol and other drug, housing and health support services operating in Adelaide, they are currently under resourced to meet the needs of complex and chronic challenges of people who access the Park Lands. In particular, there is currently a lack of assertive outreach services and culturally safe and appropriate services in language.	Lead: DHS Partners: Community organisations and ACCOs	Commencing 2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
▪ assertive outreach services to connect people to relevant supports and provide ongoing case management ▪ support after hours and on weekends ▪ culturally appropriate and safe services for Aboriginal rural and remote visitors including appropriate in-language services			
9. Co-design, with Kurna Elders and local community, a culturally safe gathering place for Aboriginal people including Aboriginal people from rural and remote areas. The gathering place should provide facilities for visitors and facilitate connections with specialist services (see recommendation 8). The place should be run and managed by Aboriginal organisations in ongoing partnership with the Kurna community.	There is currently no designated culturally safe place for Aboriginal rural and remote visitors to gather in the CoA local government area. The evaluation of the Puti on Kurna Yerta, supported by stakeholder consultations, provides evidence of the benefit of an Aboriginal-run gathering space where cultural connection can be fostered and remote visitors can access a range of alcohol and other drug services, housing and specialist supports. There is an opportunity to learn from this model and further promote connection to culture, Country and community which are well-established protective factors for Aboriginal communities.	Lead: Safety and Wellbeing Taskforce Partners: DHS, CoA, Drug and Alcohol Services South Australia (DASSA)	Commencing 2025-2026

1. INTRODUCTION

Urbis was engaged by the City of Adelaide (CoA) to conduct an evaluation of the Adelaide Park Lands Dry Area Regulations (the regulations).

This document is the draft report for the evaluation. It is structured as follows:

- **Section 1: Introduction** provides an overview of the background and context for the regulations and this evaluation.
- **Section 2: The evaluation** details the purpose, scope, data sources informing this report and the research limitations.
- **Section 3: Implementation** explores the effectiveness of strategies used to implement the regulations and the appropriateness of the Dry Area time span.
- **Section 4: Effectiveness** explores the extent to which the regulations help to reduce alcohol-related crime and harm and improve public amenity.
- **Section 5: Impact** explores the impact of the regulations on a range of target groups who interact with the Park Lands.
- **Section 6: Service landscape** explores the services and supports available for people impacted by the regulations, including gaps in service provision.
- **Section 7: Conclusion and recommendations** provides a summary of evaluation findings and recommendations for implementation of the regulations.

1.1. THE ADELAIDE PARK LAND DRY AREA REGULATIONS

Context

THE ADELAIDE PARK LANDS

The Adelaide Park Lands (the Park Lands) are a network of parks which enclose and separate the City of Adelaide from the suburbs, comprising 29 individual parks and six city squares (City of Adelaide, n.d.-a). The *Adelaide Park Lands Management Strategy: Towards 2036* describes the significance of the Park Lands in creating a healthy, respectful and vibrant lifestyle for Adelaide and South Australia (SA), by providing connections to nature and offering places for people to participate in events, cultural experiences, sporting and recreational activities (City of Adelaide, n.d.-a).

The Park Lands include a diverse range of open spaces, landscapes, community buildings, play spaces, facilities and businesses (including hospitality venues) designed to support the diverse needs of community members and visitors. The Park Lands are used by a variety of groups, spanning sports and recreation groups, schools, local residents, tourists, Aboriginal people (including those visiting from rural and remote communities) and people experiencing homelessness (City of Adelaide, 2014; City of Adelaide, 2023a).

DRY AREAS

Alcohol-free zones or dry areas prohibit the consumption and possession of alcohol in designated public spaces. Dry areas aim to curb anti-social behaviour and other alcohol-related issues in places such as reserves, shopping precincts, car parks and beaches (Government of South Australia, 2014).

Dry areas are often focused on geographic areas where public drinking is linked to complex social issues, such as social displacement and marginalisation, homelessness, health, mental health, community safety and cultural factors (Department of Health, 2019). The Adelaide city streets and squares have been permanent (24/7) dry areas since 2001 (City Community Services and Culture Committee, 2023).

THE REGULATIONS

The regulations have been in place since 2014, when they were established as a trial to address the impacts of alcohol-related behaviour in the Park Lands for the local community (City of Adelaide on 24/06/2014 City Wide Dry Area Review, 2014). The 2014 regulations restricted possession or consumption of alcohol between 8.00pm to 11.00am daily across the Park Lands. On 20 December 2019, a trial 24/7 alcohol ban was introduced in two southern parks: Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21) for three months. This was then extended for a further 28 days to expire on 17 April 2020 (City of Adelaide, 2020).

In 2021 a review was completed to extend the regulations for a further two years to 2023 (City of Adelaide, n.d.-b). In 2023, Council endorsed an application to the SA Government to extend the regulations to June 2025. As shown in Figure 1, the specific regulations currently in place are:

- Adelaide Park Lands Dry Area 1, which has been in place since 2014, is in effect from 8.00pm to 11.00am the following day, seven days per week, covering most of the Adelaide Park Lands.
- Adelaide Park Lands Dry Area 2, which was introduced in 2021 (City Community Services and Culture Committee, 2023) and covers Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21), is in effect for 24 hours a day, seven days a week (City of Adelaide, n.d.-b).²

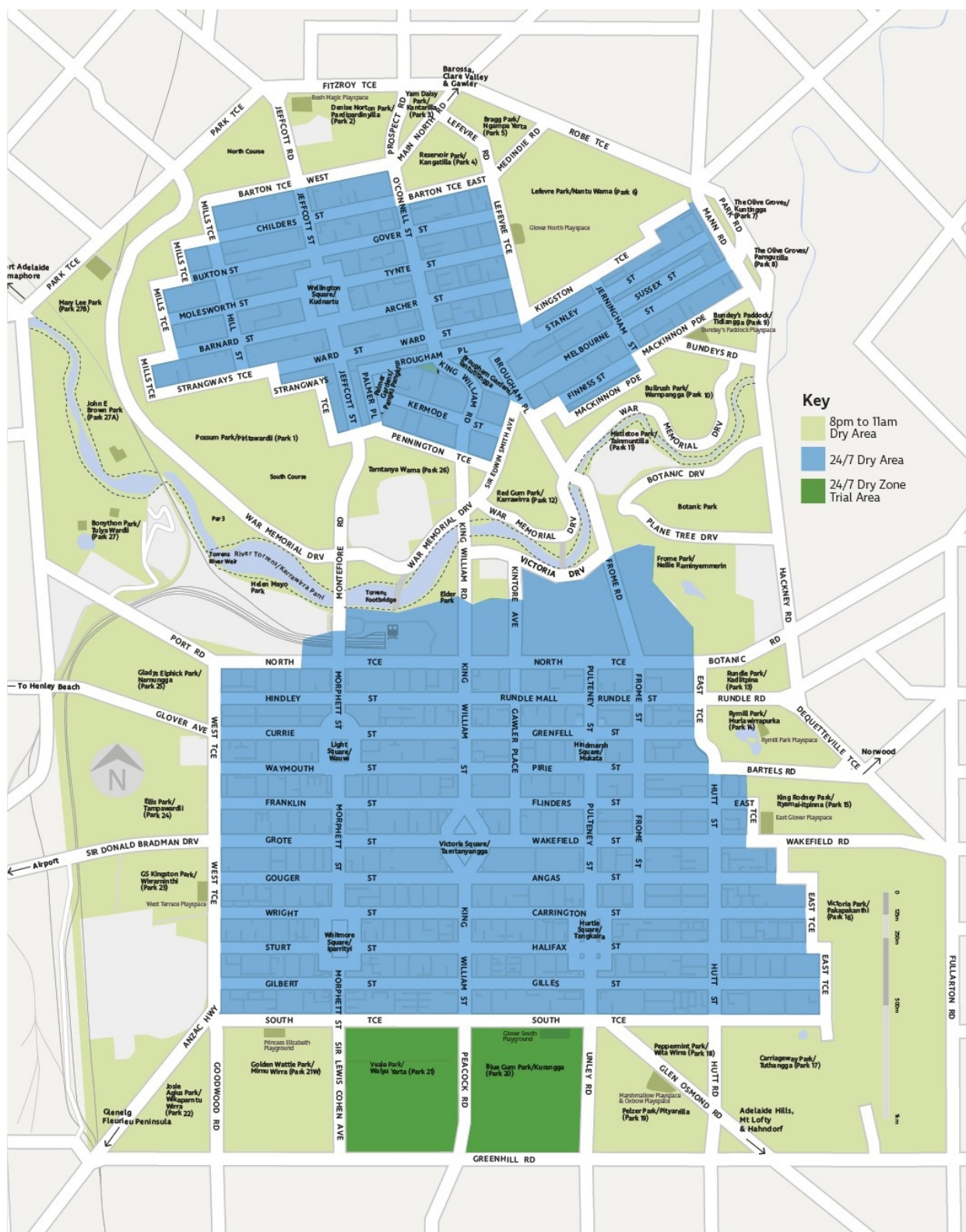
The purpose of the regulations is to curb alcohol-related problems in the Park Lands. The regulations help CoA to manage the use of the Park Lands and provide safe and accessible spaces for recreation and activities such as walking, running, quiet contemplation, picnicking and gathering socially (City of Adelaide, 2023a).

The regulations make it illegal to consume alcohol or carry an open liquor container in a designated public space. Those wishing to consume alcohol during the times that an area is designated as a Dry Area, including as part of an event, can apply for a liquor licence through the State Government Consumer and Business Services (City of Adelaide, n.d.-b).

SA Police are responsible for monitoring and enforcing the Dry Areas. Anyone who has or drinks alcohol in a Dry Area can be fined up to \$1,250 or be given an on-the-spot fine of \$160 (SA Government, 2025). SA Police have the option to tip out open alcohol containers and issue a warning rather than a fine (City Community Services and Culture Committee, 2023).

² The regulations apply only to the individual parks within the Park Lands, and not to the city squares, which are permanent dry areas.

Figure 1 – Adelaide Park Lands Dry Areas



Source: CoA

Drivers of alcohol consumption in the Park Lands

The drivers of alcohol consumption in the Park Lands by different groups vary widely and are influenced by a range of social, cultural and economic factors. For some, the Park Lands offer open spaces to enjoy a drink with friends or family, like a picnic or social outing.

For community members such as young people and people experiencing homelessness or sleeping rough, the relative accessibility and openness of the Park Lands make it a convenient location for individuals who may not have access to private spaces in which to consume alcohol. For many Aboriginal people, including those visiting from rural and remote communities, the Parks Lands provide a gathering place for socialising, cultural connection, camping and community bonding. This is discussed further below.

Understanding Park Lands usage by rural and remote visitors

Aboriginal people travel from rural and remote communities primarily in SA and the Northern Territory to Adelaide for a variety of reasons, including access to services (e.g., specialist health services and hospitals), to move away from high temperatures and policy restrictions in their home communities (such as alcohol restrictions and income management), and for family, cultural and community obligations (City of Adelaide, 2020). For many visitors, a lack of access to accommodation and housing contributes to sleeping rough/camping in the Park Lands (as well as for other people experiencing homelessness). Distinct from the typical understanding of rough sleeping in homelessness discourse, socialising and camping in parks for Aboriginal visitors and community members is additionally informed by cultural connections to camps and to the land (Tually et al., 2022).

The consumption of alcohol in the Park Lands by this group must be understood through a historical lens. It is well established within the literature that policies and practices stemming from colonisation have ongoing impacts on patterns of alcohol consumption amongst Aboriginal people and on related police interactions. For example, the exchange of alcohol for labour in the early colonial period and laws that banned Aboriginal people from public spaces led to practices of rapid and excessive drinking, which is understood to have influenced current drinking patterns (d'Abbs & Hewlett, 2023; Gray et al., 2018). The impact of intergenerational trauma on addictive behaviours is also emphasised within the literature (d'Abbs & Hewlett, 2023; Gray et al., 2018). While this history is not the sole cause of harmful alcohol use among Aboriginal people, it illustrates some of the entrenched drivers contributing to harmful drinking behaviours.

The history of policing in Australia is also essential to understanding how the regulations are perceived and enforced. Policing has been a significant instrument of colonisation and historically the relationship between police and Aboriginal people has been one of tension, violence and control (Nettelbeck & Ryan, 2018). This fraught relationship stems from a legacy of discrimination, including the enforcement of policies that displaced Aboriginal people from their lands, placed legal restrictions on their movement between regions and otherwise prohibited their participation from aspects of public life (Dockery & Colquhoun, 2012). These actions fostered a pervasive mistrust of law enforcement within Aboriginal communities that provides important context for understanding contemporary interactions between police and Aboriginal people and how the regulations are perceived by Aboriginal communities, who may view them as extensions of historical oppression rather than protective measures.

Community and stakeholder views on the regulations

Several rounds of consultation conducted by CoA have demonstrated the polarity of views held by community and stakeholders regarding the regulations since they were introduced. Consultation undertaken in 2014 found that continuation of the city-wide Dry Area (beginning 2001 and expiring 2014, and excluding the Park Lands) was supported by many community members, but its extension into the Park Lands was opposed by social services and Aboriginal representatives (City of Adelaide on 24/06/2014 City Wide Dry Area Review, 2014). Consultation undertaken in 2023 to inform the future of the regulations found equally mixed responses both supporting or opposing

continuation and showing varying preferences for potential timelines for continuation (City of Adelaide, 2023a).

A key theme that arose from the 2023 consultation was that the regulations are not an adequate solution to alcohol-related anti-social behaviour in the Adelaide Park Lands. Those who participated in the consultation described the need for long-term solutions to support the complex social needs of vulnerable people occupying the Park Lands, such as culturally appropriate preventative measures and holistic wrap-around support services. Some respondents also felt the regulations disproportionately impacted vulnerable groups without access to housing, primarily Aboriginal people visiting from rural and remote communities and people experiencing homelessness.

Strategies to minimise negative impacts of the regulations

In recognition of these concerns, strategies have been undertaken to minimise the negative impacts of the regulations as a punitive response, including the provision of services and supports to these groups. The cross-government Safety and Wellbeing Taskforce was established in 2021 by the SA Government to provide culturally safe support to those Aboriginal visitors coming to the Park Lands from remote communities. The role of the Taskforce, as set out in its Terms of Reference, is to be the lead mechanism and accountable body to develop strategies and sustainable, place-based responses that ensure the safety and wellbeing of remote Aboriginal visitors (and those around them) in Adelaide and other regional centres.

In response to a surge in visitors due to COVID-19 restrictions, the Taskforce established Puti on Kurna Yerta (Bush in the City), a temporary multi-agency service hub in the southern Park Lands which operated from October to December 2021. In 2023, following the success of Puti on Kurna Yerta and in response to significant unmet need, Safer Place to Gather, a temporary services hub, was established in Kingston Park / Wirrarninhi (Park 23). It is operated by the Department of Human Services (City of Adelaide, n.d.-c).

1.2. EVALUATION DRIVERS

While the regulations have been in operation for ten years, their effectiveness is not well understood. The SA Government and CoA have committed to monitoring and evaluating the regulations to understand their implementation, effectiveness and impact on a range of stakeholders including potentially vulnerable groups such as Aboriginal and Torres Strait Islander people, people experiencing homelessness and rough sleeping, young people aged 18 to 25 years, SA Police, residents, traders, local health and community works and CoA staff.

In November 2024, CoA engaged Urbis to undertake an independent evaluation of the regulations. Urbis partnered with Indigenous social change agency, Cox Inall Ridgeway (CIR), to develop the research instruments and communications collateral for the Aboriginal Community Controlled Organisation (ACCO) and lived experience consultations. CIR provided input into analysis and reporting to ensure the cultural relevance of findings and recommendations.

2. THE EVALUATION

2.1. PURPOSE AND SCOPE

The purpose of the evaluation was to understand the effectiveness and impact of the regulations, and to provide recommendations about their continuation and potential alternative measures that support positive outcomes for all community members and stakeholders.

The evaluation aimed to assess:

- Implementation of the regulations (i.e., the strategies used in the implementation, the effectiveness of these strategies, the appropriateness of the Dry Area time span and the barriers and enablers to successful implementation) over at least the past 12 months. Earlier implementation will be considered as relevant.
- Effectiveness of the regulations in reducing alcohol-related crime and harm and improving public amenity.
- Impact of the regulations on a range of target groups, including SA Police, residents (based on existing information), traders associated with the Adelaide Park Lands, local health and community workers, SA Government service providers, marginalised groups including Aboriginal and Torres Strait Islander people, people experiencing homelessness and rough sleeping, young people (18-25 years of age), and CoA staff working in the Adelaide Park Lands.

The evaluation also sought to understand the current wrap-around service supports delivered by SA Government and social service organisations in response to the Dry Areas.

The scope of the evaluation did not include consultation with residents as their feedback has been captured through previous CoA community engagement processes, most recently in 2023. The evaluation focused on the implementation of the regulations over the past five years (since 2019) due to data availability, however earlier implementation was also considered as relevant.

The evaluation was undertaken over a four-month period from October 2024 to February 2025, with stakeholder consultations conducted in December 2024 and January 2025.

2.2. EVALUATION QUESTIONS

The table below sets out the evaluation questions that were used to guide the evaluation.

Table 2 – Evaluation domains and questions

Evaluation domain	Evaluation questions
Implementation Implementation of the Adelaide Park Lands Dry Area Regulations (i.e., the strategies used in the implementation, the effectiveness of these strategies, the appropriateness of the Dry Area time span and the barriers and enablers to successful implementation) over at least the past 12 months. Earlier implementation will be considered as relevant.	- What strategies have been used in the implementation of the regulations? (e.g., enforcement, communications and awareness, administration, resources and training, decision making processes) - What other strategies and services support the implementation of the regulations? - How well have the regulations been implemented? - What have been the barriers and enablers to successful implementation of the regulations? - How appropriate is the Dry Area time span to meet the objectives?
Effectiveness Effectiveness of the Adelaide Park Lands Dry Area Regulations in reducing alcohol-related crime and harm and improving public amenity.	- To what extent do the regulations help to reduce alcohol-related crime and harm? - To what extent do the regulations help to improve public amenity?
Impact Impact of the Adelaide Park Lands Dry Area Regulations on a range of target groups, including SA Police, residents, traders, community organisations, SA Government service providers, marginalised groups and CoA staff working in the Adelaide Park Lands.	- What is the impact (positive and negative) of the regulations on the target groups? - To what extent do the regulations address and balance the perspectives of different groups? - Are there any unintended consequences from the regulations? - What would be the impact of removing the regulations for the different target groups? - If the regulations are removed, what alternatives are there? - Do the benefits of implementing the regulations outweigh the associated costs?
Service landscape Available wrap-around service supports delivered by SA Government and social service organisations in response to the Dry Areas.	- What is the current service and support landscape for people experiencing problems with alcohol or drug use in Adelaide? - What additional services and supports would need to be established/expanded if the regulations were removed?

2.3. METHODOLOGY

Overview

The evaluation was conducted from October 2024 to February 2025 over three stages:

- **Stage 1: Project inception and planning** (Oct – Nov 2024) included commencement of stakeholder recruitment by CoA, inception meeting, knowledge review, and development of a project plan (including research instruments) to guide the evaluation.
- **Stage 2: Data collection and analysis** (Nov 2024 – Jan 2025) included service system mapping, stakeholder recruitment, stakeholder interviews and secondary data analysis.
- **Stage 3: Reporting** (Jan – Feb 2025) includes data synthesis and triangulation, emerging findings workshop with CoA and development of a draft and final report.

Data sources and analysis

The data sources and analysis informing this report are described in the below table.

Table 3 – Data sources

Data source	Detail
Stakeholder interviews	Urbis conducted semi-structured interviews with stakeholders whose role intersects with the regulations. A total of 37 relevant stakeholders were identified by CoA and invited to take part in the evaluation. Of these, 26 stakeholders took part in interviews, exceeding the initial target of 25 stakeholders. This included: ▪ Aboriginal Community Controlled Organisations (ACCOs) (n=4 staff from 2 organisations). ▪ Community organisations (n=4 staff from 4 organisations). ▪ Safety and Wellbeing Taskforce members (n=4). ▪ CoA staff working in the Park Lands (n=4) and CoA managers with a historical perspective on the regulations (n=2). ▪ Traders operating in or near the Park Lands Area 22F³ (n=3 traders from two businesses). ▪ SA Health (n=3 staff). ▪ SA Police (n=2 staff from 2 branches). Urbis developed tailored discussion guides for each stakeholder group, with input from CIR. Depending on their role, stakeholders were asked about the implementation, effectiveness and impact of the regulations, and the service landscape in response to the Dry Areas. Interviews were conducted one-on-one or in small groups and hosted online using Microsoft Teams. With consent, the interviews were electronically recorded and transcribed. Interviews were analysed using thematic and content analysis techniques.

³ Traders in the Park Lands Area 1 were contacted but did not participate.

Data source	Detail
Lived experience interview transcripts	CoA conducted semi-structured interviews with people with lived experience who use the Park Lands. CoA worked with ACCOs, community organisations and the SA Government to identify participants to take part in consultations. A total of 18 potential participants were identified and invited to take part in the evaluation, including people with lived experience of homelessness and people sleeping rough, young people (18 to 25 years of age) and Aboriginal and Torres Strait Islander people. Of these, 2 people took part in interviews, falling short of the initial target of 6-8. This included: ▪ Young person (n=1). ▪ Aboriginal Elder (n=1). Urbis developed the discussion guides with input from CIR. Participants were asked about their awareness of the regulations, the impact of the regulations, and opportunities for improvement. Interviews were conducted face-to-face by a CoA staff member. With consent, the interviews were electronically recorded and transcribed and the transcripts were provided to Urbis for analysis. Interviews were analysed in qualitative data analysis software NVivo using thematic and content analysis techniques.
Document and data review	Urbis reviewed documentation and data provided by CoA and publicly available documentation relating to the regulations, including council reports and consultation summaries from 2014, 2020 and 2023, individual submissions from the 2023 council consultation and evaluation reports. The purpose of this review was to provide insight into the context and key decision points for the regulations, and provide insight, implementation, effectiveness and impact of the regulations. Documentation was analysed in NVivo using thematic and content analysis techniques.
Service mapping	Urbis conducted a desktop scan of publicly available information regarding service responses for people experiencing problems with alcohol or drug use in Adelaide, as well as any relevant documentation provided by CoA. Service responses were mapped against key features such as service type, target group/s, geographic area etc. The information obtained through the scan was supplemented and validated during the stakeholder consultations. Key findings from the service mapping are included in Section 6, and the full results are provided in Appendix A.
First responder data	Up-to-date first responder data was sought from SA Police and the SA Ambulance Service (SAAS) to understand the number of alcohol-related incidents in and around the Park Lands Dry Areas, and any changes over time in service demand. CoA requested SA Police data from 2019 to 2024 and was provided with data spanning January 2022 to October 2024. Data points were provided for each month and included: ▪ Number of expiation notices issued for offences of consuming or possessing liquor in a dry area during hours of prohibition.

Data source	Detail
	▪ Number of crime occurrences relative to offences associated with alcohol-related crime and anti-social behaviour. ▪ Number of police taskings relative to anti-social behaviour. ▪ Number of Public Intoxication Act detentions in which a person can be detained for the purpose of being taken to a place where someone is willing and able to care for them. SA Police advised that while the data can be referenced, specific items cannot be reported in detail to protect confidentiality. CoA requested SAAS data to 2024. The organisation’s ‘Submission to the Review of the Adelaide City Park Lands Dry Area Regulation’, which included SAAS analysis of incident data spanning 2012 to 2022, has been used to understand ambulance service demand. Data points were provided for each year (broken down by whether the incident occurred between 8:00pm to 10:59am or between 11:00am to 7:59pm) and included: ▪ Number of SAAS incidents across all Park Lands each year. ▪ Number of SAAS incidents in Parks 20 and 21 each year. ▪ Number of drug and alcohol-related incidents in Park Lands each year. ▪ Number of drug and alcohol-related incidents in Parks 20 and 21 each year. In February 2025, SAAS provided the following additional data to CoA: ▪ Number of SAAS incidents in Parks 20 and 21W each year (2014-2024). ▪ Number of drug and alcohol-related incidents in Parks 20 and 21W each year (2016-2022). Additional data provided did not include data relating to Park 21, nor did it include drug and alcohol-related incidents throughout the whole of the Park Lands.

Limitations

The following limitations should be considered when reading this report:

- There was limited quantitative first responder data available to assess the effectiveness of the regulations in reducing alcohol-related crime and harm over time. As such, findings draw on stakeholder consultations and previous stakeholder engagement conducted by CoA, and stakeholders' views on the impact and effectiveness of the implementation are largely anecdotal.
- Primary data collection was conducted within a short timeframe from November 2024 to January 2025. As a result, a small number of stakeholders were not available to take part in interviews with the evaluation team. Multiple attempts were made by CoA to increase participation of ACCOs and people with lived experience in interviews, however only a small number from these stakeholder groups took part (2 ACCOs from a target of 5, and 2 people with lived experience from a target of 6-8). Given the number of organisations and individuals who may hold views on the regulations, findings are not representative of all relevant stakeholders.
- In some instances, stakeholders within the same organisation shared different views on the effectiveness and impact of the regulations. This limits the ability to generalise or ascribe views to stakeholder groups or organisations.
- Service mapping was undertaken via a desktop scan of publicly available information and supplemented with stakeholder input. There was variation in the completeness and availability of information pertaining to each service. Attempts were made to gather as much information about the service landscape as possible within the timeframe, however some details could not be verified. Where information was not able to be identified, this is indicated by 'Information not available' (see Appendix A).
- As detailed in Section 1.1, the problem of alcohol-related crime and harm in the Park Lands, and the role of the regulations in addressing this harm, must be understood not as an isolated issue but one that has arisen from and is driven by a variety of intersecting factors. This is important context for the evaluation findings.

3. IMPLEMENTATION OF THE REGULATIONS



KEY FINDINGS

- **Overall, the regulations have been implemented well.** Stakeholders agreed on clear roles and good public awareness of the regulations, though some groups, such as young people and visitors, may be less knowledgeable about specific bans. While feedback opportunities were appreciated, decision-making processes regarding the Area 2 24/7 ban – and the underpinning rationale – were sometimes unclear.
- **The regulations are viewed as a ‘tool’ for intervening and reducing alcohol-related crime and harm in the Park Lands.** Stakeholders saw the regulations as important for reducing alcohol-related crime and maintaining public safety. The enforcement approach adopted by SA Police was generally considered appropriate. There was some concern about the effectiveness of tipping out alcohol as an intervention measure given individuals can easily refill their alcohol containers.
- **Operation Paragon’s approach, inter-agency collaboration and culturally safe gathering places all support the implementation of the regulations.** Operation Paragon officers prioritising support and wellbeing over punitive measures, building authentic relationships, and adapting to emerging priorities were viewed as key enablers of effective implementation. Additionally, strengths of the service system including an inter-agency collaborative approach and the availability of culturally safe gathering places were highlighted.
- **Several barriers impact implementation of the regulations.** These include resourcing constraints for SA Police and inconsistent awareness of the regulations among community members.
- **There are mixed views about the appropriateness of the Dry Area time span to meet the objectives.** Stakeholders expressed concern about the fairness and rationale behind the inconsistent alcohol ban times in the Park Lands, particularly the 24/7 bans in Area 2, arguing it disproportionately affects certain groups and complicates enforcement. Most preferred the 8pm to 11am ban as a balanced approach.

This section addresses the following evaluation questions:

- What strategies have been used in the implementation of the regulations? (e.g., enforcement, communications and awareness, administration, resources and training, decision making processes)
- What other strategies and services support the implementation of the regulations?
- How well have the regulations been implemented?
- What have been the barriers and enablers to successful implementation of the regulations?
- How appropriate is the Dry Area time span to meet the objectives?

OVERALL, THE REGULATIONS HAVE BEEN IMPLEMENTED WELL

Stakeholders consulted for the evaluation generally agreed the regulations have been implemented effectively. Almost all considered roles and responsibilities of stakeholders involved in implementation were clearly defined, and there is good public awareness about the regulations

within the community. It was suggested, however, that some community members – including young people, tourists and rural and remote visitors – may be less aware of the specific regulations, particularly the 24/7 ban in Parks 20 and 21.

Some stakeholders from SA Government and ACCOs/community organisations reflected positively on opportunities to provide feedback and input on the regulations, including through this evaluation and previous reviews. It was noted however, that decision-making processes and particularly the decisions to introduce and extend the 24/7 ban in Parks 20 and 21, were not always clear.

The table below summarises key strategies and stakeholder roles in the implementation of the regulations.

Table 4 – Implementation strategies and roles

Strategy	Stakeholder roles
Decision making	CoA is responsible for making informed decisions regarding the recommended continuation, amendment or removal of the regulations based on data and community feedback. The SA Government is responsible for approving amendments to the regulations requested by CoA. The approval process for Adelaide Park Lands Dry Areas is: ▪ Council makes an application to SA Government via Consumer and Business Services. ▪ The Liquor and Gambling Commissioner reviews the application and makes a recommendation to the Minister for Consumer and Business Affairs. ▪ If approved by the Minister, Dry Areas are made public by notice in the Government Gazette.
Administration	CoA is responsible for managing the administrative aspects of implementation of the regulations, including record-keeping, reviewing the regulations, community engagement, requesting amendments to the regulations and coordination with other stakeholders. The SA Government is responsible for considering amendments to the regulations and coordination with other stakeholders.
Communications and awareness	CoA is responsible for ensuring awareness of the regulations among stakeholders and the community through online content and communications materials. Other organisations (including SA Government, community organisations and ACCOs) also have a role in spreading awareness of the regulations.
Enforcement	SA Police is responsible for enforcing the regulations, responding to information provided by the public, ensuring compliance and addressing breaches. CoA is responsible for encouraging compliance through awareness raising and reporting violations at their discretion (e.g., staff working in the Park Lands).

Strategy	Stakeholder roles
Resources and training	SA Police is responsible for training their officers to enforce the regulations. CoA may also provide training and resources to its staff to support awareness and compliance efforts. Other stakeholders (including SA Government, community organisations and ACCOs) may also provide training and resources to their staff to support people impacted by the regulations.

Source: Stakeholder interviews and documentation provided by CoA

THE REGULATIONS ARE VIEWED AS A ‘TOOL’ FOR INTERVENING AND REDUCING ALCOHOL-RELATED CRIME AND HARM IN THE PARK LANDS

Many stakeholders viewed the regulations as an important tool for intervening and reducing alcohol-related crime and harm and maintaining safety in the Park Lands. The regulations provide a clear legal framework that empowers SA Police to intervene in situations where alcohol consumption may lead to anti-social behaviour or crime. This legal basis provides officers with powers to issue expiation notices, warnings and move-on orders to individuals found in violation of the regulations. Officers also have the authority to search individuals they suspect are in violation of the regulations and to make arrests where there is a significant threat to public safety.

Stakeholders reported that in practice, SA Police officers rarely exercise these powers to enforce the regulations. Instead, they use their discretion and where it is deemed necessary, they may opt to obtain the details of individuals and tip out alcohol, while also assessing their need for referral to relevant social services. It was noted that many of the individuals who routinely violate the regulations would be unable to pay fines issued, and a more punitive approach would likely do more harm than good. This approach was viewed by most as appropriate to prevent potential escalation and the need for more intensive crisis responses.

[Police are] able to utilise [regulations] when they want to... if you behave yourself, they tend to let things slide. – CoA stakeholder

This is reflected in data provided by SA Police spanning January 2022 to October 2024, which showed relatively low rates of enforcement in the Park Lands when compared to the wider Adelaide CBD. However, South Australian Computer Aided Dispatch (SACAD) police tasking in the Park Lands (specifically in relation to anti-social behaviour) has increased more considerably in the Park Lands than it has across the broader CBD area in the same period.

However, there were some concerns raised about the effectiveness of simply tipping out alcohol, as individuals can easily refill their containers. The use of the regulations as a ‘tool’ for managing anti-social behaviour is described further in Section 5.

OPERATION PARAGON’S APPROACH, INTER-AGENCY COLLABORATION AND CULTURALLY SAFE GATHERING PLACES ALL SUPPORT THE IMPLEMENTATION OF THE REGULATIONS

Operation Paragon

Operation Paragon is a dedicated SA Police unit focused on addressing alcohol-related anti-social behaviour through a multi-agency approach (Government of South Australia, 2023). It helps to facilitate access to support services that address the health and welfare needs of at-risk individuals in the community (Government of South Australia, 2023). Stakeholders including ACCOs consistently praised the relational approach of Operation Paragon, with one stakeholder

highlighting their commitment to being “part of the solution, not the problem” and keeping people out of custody.

Operation Paragon officers are chosen for their ability to build authentic relationships with community members and other agencies. Stakeholders provided examples of this approach, such as officers getting to know individuals in the Park Lands by name, participating in community events, building relationships with social services and making referrals. In the context of limited resourcing and a small team, Operation Paragon activities shift in response to emerging priorities, such as increasing patrols in response to rising incidents in the CBD or reallocating resources to support initiatives such as Puti on Kurna Yerta and Safer Place to Gather.

[Paragon is] strongly focused on relationship building... they're very proactive and engaging with people in a non-stigmatising way. I think [Paragon]... is a unique offering. – Community organisation stakeholder

Operation Paragon collaborates closely with various agencies, including the CoA, DHS, community organisations and ACCOs to support vulnerable people in the Park Lands. A shift in policing culture was noted by one stakeholder as moving from an enforcement-based approach to one that prioritises the wellbeing of vulnerable community members. Instead of punitive actions like fines and arrests, Operation Paragon focuses on what one stakeholder described as “*preventative measures*” such as tipping out alcohol and engaging with individuals to understand their needs and address the root causes of anti-social behaviour.

In the last 6 to 9 months, we've changed the focus [of the Paragon team] ... to collaborative stakeholder engagement rather than an enforcement focus. From a relationship point of view, it is better for Paragon to not have a high enforcement focus or to wield a big stick. It's better for them to get to know people, to have those ongoing relationships. – SA Police stakeholder

Inter-agency collaboration

Collaboration between agencies to support people impacted by the regulations is an important enabler of implementation. Most stakeholders expressed goodwill and a strong commitment to work together to address complex social issues that contribute to alcohol-related harm in the Park Lands. Several stakeholders noted the establishment of the Safety and Wellbeing Taskforce has been positive in coordinating efforts to better support rural and remote visitors. The Taskforce has facilitated communication and cooperation between different agencies, enhancing the overall effectiveness of the regulations.

Providing safer places for rural and remote visitors

Stakeholders noted the importance of providing culturally safe and welcoming places for rural and remote visitors to gather, engage in cultural activities, socialise and camp while in Adelaide. It was noted initiatives such as Puti on Kurna Yerta can help to reduce breaches of the regulations and promote service access among potentially vulnerable visitors. This is discussed further in Section 6.

Aboriginal community have been asking for some sort of safe space within the Park Lands for as long as I've been around. – ACCO/community organisation stakeholder

SEVERAL BARRIERS IMPACT IMPLEMENTATION OF THE REGULATIONS

Resourcing constraints

Limited resources have constrained the ability of Operation Paragon (and SA Police more broadly) and support services to ensure comprehensive enforcement of the regulations and fully address the needs of the community. Stakeholders commonly reported this led to gaps in service provision and inconsistent enforcement, undermining the overall effectiveness of the regulations. This is discussed further in Section 5.

Even though they are intoxicated... the [Mobile Assistance Patrol (MAP) bus] couldn't pick them up because there's no capacity in the MAP [bus]. – ACCO/community organisation stakeholder

Inconsistent awareness of the regulations

Stakeholders suggested some community members may not be fully aware of the specific regulations and particularly the 24/7 alcohol ban in Parks 20 and 21. One lived experience interviewee described that they were not aware of the time spans of the regulations and highlighted the need for additional signage.

I don't think I actually knew what the regulations fully were and what areas were not dry zones... I wouldn't have told you off the top of my head and I don't think I could even recollect seeing any signs near the parks that I used to frequent. – Lived experience stakeholder

THERE ARE MIXED VIEWS ABOUT THE APPROPRIATENESS OF THE DRY AREA TIME SPAN TO MEET THE OBJECTIVES

As outlined in Section 1.1, the current regulations prohibit alcohol consumption in the Park Lands from 8.00pm to 11.00am the following day, seven days a week. This applies to all parks, except Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21), where the ban is in effect for 24 hours a day, seven days a week. The inconsistency in the time spans of the Dry Areas across different parks was a point of contention among stakeholders consulted for the evaluation and in the 2023 consultation.

Some stakeholders questioned why these two parks have a 24/7 ban while others do not, and whether this is justified by specific issues or data. Critics of the 24/7 ban argued that it disproportionately affects certain groups such as Aboriginal people and those experiencing homelessness and suggested that such stringent measures could push alcohol consumption into less visible and potentially more dangerous areas, rather than addressing the underlying drivers of alcohol-related harm (as will be discussed further in Section 5).

The inconsistency in time spans raises questions about the fairness and equity of the regulations, as different parks are subject to different rules without a clear and transparent rationale. It was also noted as potentially contributing to confusion among park users and complicating enforcement efforts by SA Police. While a small number of stakeholders believed a 24/7 ban should be applied across all Park Lands, most were of the view that this would be too restrictive and limit the enjoyment of the Park Lands, and felt the 8pm to 11am ban struck the right balance in meeting the objectives without unduly impacting the community.

Having a time frame on the dry zone regulations is not ideal from a policing perspective... sometimes the group of people causing the most issues are well aware of what the times are and they are of the belief [police] can't act during those times. – SA Police stakeholder

4. EFFECTIVENESS OF THE REGULATIONS



KEY FINDINGS

- **There is insufficient quantitative data available to demonstrate the efficacy of the regulations.** Inconsistent data collection and sharing by various agencies, including first responders and CoA, since 2014 have made it difficult to assess the regulations' effectiveness. As a result, stakeholders have had to rely on limited and anecdotal evidence.
- **There are mixed views about the extent to which regulations help to reduce alcohol-related crime and harm and improve public amenity.** Some stakeholders noted a reduction in alcohol-related crime and harm, while others doubted the regulations impact, and most agreed improvements in public amenity were likely due to relocation of marginalised groups to other areas within Adelaide.
- **The regulations alone are insufficient to reduce alcohol-related crime and harm in the Park Lands.** Stakeholders agreed alcohol-related crime and harm in the Park Lands will persist until the underlying drivers relating to substance use, health, housing, and employment were addressed.

This section addresses the following evaluation questions:

- To what extent do the regulations help to reduce alcohol-related crime and harm?
- To what extent do the regulations help to improve public amenity?

THERE IS INSUFFICIENT QUANTITATIVE DATA AVAILABLE TO DEMONSTRATE THE EFFICACY OF THE REGULATIONS

Inconsistent data collection and data sharing arrangements have been in place since the introduction of the regulations in 2014, making it challenging to determine trends and assess patterns in occurrence of alcohol-related incidents in and around the Dry Areas and any changes over time. All stakeholders interviewed had low confidence in their ability to assess the efficacy of the regulations, citing limited data availability and reliance on anecdotal evidence and observations. This related to the efficacy of both the 24/7 bans in Parks 20 and 21 and the 8pm-11am ban throughout the remainder of the Park Lands.

The most complete quantitative data set available is that captured by SAAS between 2012 and 2022. This was strengthened by updated SAAS data showing total incidents throughout Parks 20 and 21 from 2014-2024. Data for total drug/alcohol-related incidents in Parks 20 and 21 was unavailable for 2023 and 2024. While SAAS data shows a moderate reduction in the number of drug and alcohol-related incidents in Parks 20 and 21 in 2022 following the implementation of 24-hour dry areas in 2021, this data has the following limitations:

- Data relates to how cases (incidents) were categorised at the time of the triple zero call, meaning the nature of each incident may have been misidentified.
- A spike in incidents during 2021 due to the COVID-19 pandemic and travel restrictions, which prevented remote visitors from returning to Country, may have impacted the strength of data collected.

- This was acknowledged by SAAS, who hypothesise the increase in SAAS incidents in 2021 likely related to the establishment of Puti on Kurna Yerta in Park 21 and the ability for people to access ambulance services to address health needs.
- SAAS data collection methods did not differentiate between attendances for drug use, alcohol use, or a combination of both, meaning the demand on SAAS caused by alcohol consumption alone could not be established.

Ultimately, SAAS supported extension of the regulations while acknowledging a need for ‘cleaner’ data capture, particularly given COVID-19 restrictions have been lifted.

Quantitative data provided by SA Police spanned January 2022 to October 2024. This data indicated an increase in police taskings for the Park Lands compared to the rest of the Adelaide CBD, however the limited timespan of data makes observations of general trends for other data points difficult. Further, data provided does not differentiate between Parks 20 and 21 and all other areas within the Park Lands. As data provided commences in 2022, there is no baseline data available to understand how the establishment of a 24-hour Dry Area in Parks 20 and 21 may have influenced the occurrence of alcohol-related incidents and demand on SA Police.

Additional data points which could support the collation of more robust data and improved understanding of the drivers of alcohol-related crime, harm and disorder in the Park Lands may include:

- Basic demographic data of individuals, such as gender, age, housing status, housing location (e.g., postcode).
- The timing of incidents (whether the incident occurred between 8:00pm to 10:59pm or between 11:00am to 7:59pm).
- Exact geographic location within the Park Lands i.e., Park 20.

THERE ARE MIXED VIEWS ABOUT THE EXTENT TO WHICH THE REGULATIONS HELP TO REDUCE ALCOHOL-RELATED CRIME AND HARM AND IMPROVE PUBLIC AMENITY

Reflecting prior rounds of consultation on this subject, stakeholders engaged as part of this research had mixed views as to whether the regulations have helped to reduce alcohol-related harm and improve public amenity in the Park Lands. It is important to note that stakeholders within the same organisation may have shared differing views on regulation effectiveness, making it inappropriate to generalise or ascribe views to particular stakeholder groups. Given the absence of quantitative data to demonstrate the efficacy or otherwise of the regulations, stakeholders’ views are largely informed by their role and visibility of alcohol consumption in the Park Lands.

Some CoA stakeholders and traders identified examples of anecdotal evidence that the regulations have supported a reduction in alcohol-related issues in the Park Lands, including a decrease in property damage, vandalism, littering and anti-social behaviour, and making the Park Lands safer and more accessible for the community, traders and CoA staff.

Ten years ago now... South Terrace [especially] the Veale Gardens (Park 20) area was shocking... everyday it was out of control... the violence, the damage... it was very intense. [People] tended to congregate in one spot, whereas these days it's way more spread out. – CoA stakeholder

However, other interviewees from CoA, SA Government, and ACCOs/community organisations had lower confidence that the regulations were influencing community behaviour, citing the continuation of excessive alcohol consumption in areas subject to both the 24/7 ban in Area 2 and

8pm-11am ban in Area 1. Among these stakeholders, it was highlighted that the regulations are an ineffective approach that has little to no impact on the decision-making and behaviour of people drinking in the Park Lands, particularly those at risk of homelessness.

The regulations don't impact decision making or behaviours of the population [homeless] that we're working with. – ACCO/ Community organisation stakeholder

[Dry area regulations] are probably not really working. They might be reducing some social and health issues, but I guess they're not actually working. – SA Government stakeholder

Most stakeholders interviewed agreed any increase in public amenity experienced in Parks 20 and 21 was likely due to the re-location of individuals consuming alcohol to other areas within the Park Lands or beyond the CBD as opposed to a reduction in alcohol consumption in Area 2. Some stakeholders expressed frustration and concern that the regulations are merely moving the 'problem' from one area of Adelaide to another. It was also noted that relocating people out of the CBD often moves them further away from support services. This is discussed further in Section 5.

What we have found is we will see decreased incidence of emergency presentations around areas where there are dry zones. But we also know that it displaces people. It's not that people now don't drink... it's that those people are going elsewhere, so we're not really avoiding the harms necessarily to communities from having these regulations, if that makes sense. – SA Government stakeholder

I think in one way we can look at [regulations] as a band-aid measure... it kind of covers up or displaces the problem. – SA Government stakeholder

As noted in Section 5, most stakeholders involved in the implementation of the regulations held the view that the regulations were one of many 'tools' available to support increased safety and reduced harm in the Park Lands. Stakeholders believed the ability of SA Police, including Operation Paragon, to decant alcohol and issue expiation notices was critical as it provided an opportunity for police to engage with individuals consuming alcohol in public without charging them with an offence. Some stakeholders interviewed believed the capacity for police to remove alcohol in circulation was important for supporting the health of individuals, as well as the broader outcome of increasing community comfort and safety. It was noted that the capacity of SA Police to decant alcohol at any time of the day in Parks 20 and 21 can result in earlier intervention with people in the Park Lands, potentially preventing a more escalated interaction later in the day (after 8:00PM) when a person may be very intoxicated and when community support services are not available for police to refer to.

Additionally, a small number of stakeholders consulted believed the regulations would be more effective in reducing alcohol-related crime and harm and improving public amenity were they better enforced by SA Police.

These stakeholders characterised 'better' enforcement as an increased police presence in the Park Lands, as well as an increase in expiation notices issued.

THERE WAS AGREEMENT AMONG STAKEHOLDERS THAT THE REGULATIONS ALONE ARE INSUFFICIENT TO REDUCE ALCOHOL-RELATED CRIME AND HARM IN THE PARK LANDS

As echoed in prior rounds of community consultation undertaken by CoA, there is almost universal consensus among stakeholders that alcohol-related crime and harm is likely to continue in the

Park Lands so long as systemic issues relating to alcohol and substance misuse, health, housing and employment remain unaddressed. While it was acknowledged that implementation of a holistic and coordinated approach to addressing the systemic drivers of alcohol misuse in the Park Lands is not within the remit of CoA alone, stakeholders interviewed emphasised the need to invest in a multi-faceted and collaborative approach to addressing the underlying drivers of alcohol-related crime and harm.

Respondents to the 2020 CoA Your SAY who disagreed with the introduction of 24-hour Dry Areas (84%, n=774) generally opposed them on the basis that Dry Areas were not addressing the root cause of alcohol abuse, instead criminalising what they believed was a health issue. A high proportion of respondents indicated they would like to see more funding for social support services instead of the ban. This sentiment was also demonstrated in the less extensive 2023 public consultation.

Substance abuse issues need to be addressed, not pushed away to other areas. Council should work with other levels of government to implement long-term [policies] that support all members of our community, including those who drink too much. – CoA YourSAY survey respondent, 2023

There is evidence to indicate alcohol misuse is just one of many factors contributing to decreased public amenity and safety within the Park Lands. The compounding impacts of the housing crisis, rising cost of living, and increased accessibility of alcohol and other drugs are likely contributing to a rise in mental ill-health and further driving rates of public drinking. The lack of stable housing and financial pressures from the high cost of living increase stress and anxiety. Additionally, the increased availability and use of substances can lead to dependency and exacerbate existing mental health issues. These factors together result in more frequent and complex mental health and alcohol and other drug challenges, requiring comprehensive support systems to address. Poly-substance use was identified as a key issue for consideration by stakeholders interviewed. Several ACCO/community organisation stakeholders expressed concerns around the increasing use of methamphetamine and GHB among people in the Park Lands. One SA Police stakeholder noted that, as a depressant, individuals affected by GHB may present similarly to someone who is heavily intoxicated.

Mental health is a huge problem [in Adelaide], as it is in every other city around Australia... people who are substance affected as well as alcohol affected [are] very vulnerable, but in a CBD environment it brings those people into interaction with much larger groups of people. There are various community groups and sporting groups using [the Park Lands], so if they're coming across people who are substance affected that are having mental health episodes... that is really going to affect their sense of safety and wellbeing. – SA Police stakeholder

5. IMPACT OF THE REGULATIONS



KEY FINDINGS

- **The ability to responsibly consume alcohol in the Park Lands is viewed as important for upholding the personal rights of local residents and visitors.** This ability was valued by the general public, with many considering 24/7 Dry Area regulations in all areas of the Park Lands to be an infringement on personal freedoms.
- **There is concern among some stakeholders that the regulations disproportionately impact marginalised communities,** with many describing how people experiencing homelessness and those from remote communities may be subject to discriminatory enforcement that displaces them from essential services, further complicating their access to specialist supports.
- **Most stakeholders agreed the removal of the regulations without substantive service reform could have a detrimental impact on the health of individuals and the experience of the broader community.** The role of the regulations to intervene and deescalate problematic drinking was emphasised and valued.
- **The regulations provide an increased sense of safety for some stakeholders, including traders, CoA workers and local residents,** who believed the regulations enhance safety for workers and users of the Park Lands by allowing police to manage alcohol consumption and mitigate behaviours that impact public perception of safety.

This section addresses the following evaluation questions:

- What is the impact (positive and negative) of the regulations on the target groups?
- To what extent do the regulations address and balance the perspectives of different groups?
- Are there any unintended consequences from the regulations?
- What would be the impact of removing the regulations for the different target groups?
- If the regulations are removed, what alternatives are there?
- Do the benefits of implementing the regulations outweigh the associated costs?

THE ABILITY TO RESPONSIBLY CONSUME ALCOHOL IN THE PARK LANDS IS VIEWED AS IMPORTANT FOR UPHOLDING THE PERSONAL RIGHTS AND FREEDOMS OF LOCAL RESIDENTS AND VISITORS

Documentation and data provided by CoA coupled with stakeholder interviews provide strong evidence to suggest the general public value the ability to consume alcohol in the Park Lands. Additionally, some stakeholders supported the right of marginalised communities to consume alcohol in the Park Lands, noting the historic and cultural relevance of the Park Lands as a cultural gathering place, and that public space is often the only space accessible to remote visitors and people experiencing homelessness.

In early 2020, CoA sought community feedback to understand levels of support for a 24/7 dry area across all areas of the Park Lands. Feedback was collected through an online survey (n=921) and an intercept survey (n=551).

Intercept survey respondents (the majority of whom were families using playgrounds in the southern Park Lands) were more likely to support the introduction of 24/7 dry areas in all of the

Park Lands. However, online survey respondents were far less supportive of 24-hour dry areas. The majority of online survey respondents 'strongly disagreed' (75%, n=686) or 'disagreed' (9%, n=86) with a 24/7 dry area across all areas of the Park Lands, indicating they used the Park Lands as a space to socialise, eat and drink with family and friends and viewed the imposition of a 24-hour dry area as an infringement on their personal rights and freedom. Notably, many online survey respondents who opposed 24/7 dry areas reported they were CoA residents.

[In 2020] a blanket 24/7 ban [in the Park Lands] was discussed... as a result of a lot of different community views and feedback, the 8:00 PM to 11:00 AM ban [was maintained in most parts of the Park Lands which] ... allows people having lunch time or early evening picnics... to be able to have a drink without breaching the [regulations]. – SA Police stakeholder

Additionally, several community organisation stakeholders interviewed described the importance in allowing members of marginalised communities, including remote visitors and people experiencing homelessness, some level of agency in how they use public space. Community organisation stakeholders interviewed described how many people who consume alcohol in the Park Lands do not have access to private property and may be excluded from licenced premises due to economic factors or because of discrimination.

Having different regulation times probably allows for the expectations of community to be met. For people who are without housing to have a little bit of agency about how they spend their time, and what they do during the day – up until a point. – ACCO/Community organisation stakeholder

THERE IS CONCERN AMONG SOME STAKEHOLDERS THAT THE REGULATIONS DISPROPORTIONATELY IMPACT MARGINALISED COMMUNITIES

This evaluation identified a range of concerns relating to how regulations may be disproportionately impacting marginalised communities who frequent the Park Lands. However, this evaluation was unable to draw on substantive lived experience perspectives or quantitative data to understand the extent to which these communities are impacted. When describing groups most impacted by the regulations, stakeholders identified people experiencing homelessness and Aboriginal rural and remote visitors, specifically those visiting from Anangu Pitjantjatjara Yankunytjatjara (APY) Lands.

One of the primary concerns raised was that the regulations can displace vulnerable people who are seeking to avoid penalties. There was a belief among some stakeholders interviewed that this movement to other areas within the Park Lands and to areas outside of the Adelaide CBD may isolate vulnerable people from essential services and support networks (often more focused on the CBD), fragment communities, and complicate efforts by services to identify needs and provide support. Some stakeholders noted that regulations can also make it more challenging for community organisations to build rapport with people in the Park Lands, limiting the extent to which they can develop an understanding of individuals' needs and connect them with relevant services and supports.

[The regulations] dislocate people from their support networks and their social circles. It dislocates people from their ability to seek care. – SA Government stakeholder

Additionally, there was concern the regulations have disproportionate impacts on those at risk of homelessness, given their lack of access to private spaces (i.e., housing) where they can consume

alcohol legally. This contributes to alcohol consumption occurring in the public spaces of the Park Lands. There was concern flagged by some community organisation stakeholders that the regulations mean marginalised communities are more likely to be in contact with a justice response for consuming alcohol than those who are able to do so in private spaces. It was also raised that the regulations may lead people to occupy less visible spaces, such as hidden or unsafe locations, to avoid penalties, which could risk their safety. One Aboriginal person interviewed described the act of moving around the Adelaide CBD to avoid enforcement of dry area regulations.

[When dry area regulations were introduced in the CBD] people wouldn't meet in Victoria Square anymore. They'd go "we can't go there; we'll go to Light Square or Hindmarsh Square" ... they'll go somewhere else. And then you know, [there would] be complaints from... other people in those areas saying, "now there's people here drinking and being loud and doing all this stuff". – Lived experience stakeholder

Several community organisation stakeholders and one lived experience stakeholder interviewed expressed concern that the regulations can be enforced inconsistently and in a manner which could potentially be discriminatory. It was suggested that under the regulations, SA Police officers have discretion to make subjective decisions, which may be influenced by conscious or unconscious biases. One community organisation stakeholder expressed concern that police attendance (tasking) throughout the Park Lands is often responsive to complaints (e.g., triple zero calls) about anti-social behaviour in the Park Lands. They described that members of the public and traders making complaints are likely to be influenced by conscious and unconscious biases, which could potentially lead to certain individuals or groups receiving more attention and potentially being penalised more harshly than others for similar behaviours.

Perception is an issue. People might hear a lot of Pitjantjatjara speakers... people speaking in language [who are] intoxicated. All you hear is really loud speech... [this] can come across as aggression. Drunken blackfullas are mischaracterised as aggressive. – ACCO/Community organisation stakeholder

There is also concern among the wider community, including CoA residents, that Dry Area regulations cause harm to marginalised communities. Online survey responses from late 2023 showed five of the 30 YourSAy survey respondents believed the Dry Area restrictions were discriminatory and racist. However, the majority of respondents to a much larger (n=912) YourSAy community feedback survey in early 2020 reported Dry Area regulations disproportionately affect people experiencing homelessness as well as the Aboriginal and Torres Strait Islander communities who traditionally gather and socialise in the Park Lands.⁴

The creation of the Dry Area regulations was... racist... all dry area constraints should be removed immediately. – YourSAy survey respondent, 2023

The potentially detrimental impact of the regulations on individuals who misuse substances was also noted by stakeholders from two drug and alcohol-focused organisations. They raised concerns the regulations may be detrimental to achieving better health outcomes for individuals struggling with alcohol and drug addiction. This feedback was consistent with what was reported to CoA in previous rounds of consultation. For example, the South Australian Network of Drug and Alcohol Services described in their written submission to Adelaide Park Lands Dry Area Regulation Consultation 2023 the potentially perverse outcomes of dry areas. These included the replacement of alcohol with illicit drugs, which may be easier to conceal in public spaces, as well as

⁴ Analysis of survey responses was conducted internally by CoA staff.

an increase in drinking in private premises. South Australian Network of Drug and Alcohol Services suggested this has the potential to increase risks to already vulnerable members of the community and highlighted that consideration of alcohol consumption in the Park Lands through a health and harm minimisation lens would be of benefit to both Aboriginal and non-Aboriginal people alike. The prospective format of such supports is discussed further in Section 6.

MOST STAKEHOLDERS AGREED THE REMOVAL OF THE REGULATIONS WITHOUT SUBSTANTIVE SERVICE REFORM COULD HAVE A DETRIMENTAL IMPACT ON THE HEALTH OF INDIVIDUALS AND THE EXPERIENCE OF THE BROADER COMMUNITY

There was concern among many stakeholders that the removal of the regulations without substantive service reform could have various negative impacts. Broadly, there was agreement amongst various stakeholder groups (including SA Police, SA Government and traders) that removing the regulations would likely make it more difficult to manage alcohol-related incidents. Some CoA and ACCO/community organisation stakeholders suggested it could lead to an increase in incidents.

[Removing the regulations] ... is dangerous... it would send a message that [public intoxication] is acceptable behaviour. – SA Government stakeholder

In particular, the potential negative impacts on marginalised communities that use the Park Lands were raised. As discussed in Section 3, many stakeholders highlighted the importance of the regulations as a legal means through which SA Police can intervene and deescalate problematic drinking before it reaches crisis point. Some stakeholders (SA Government) believed that if the regulations were removed, this would likely lead to more emergency department presentations or Public Intoxication Act apprehensions, as there would be no ability to actively intervene and deescalate problematic drinking before it reaches crisis point and prompts these responses. This was highlighted as particularly problematic in the context of Closing the Gap and the Royal Commission into Aboriginal Deaths in Custody, which called out the overrepresentation of Aboriginal people in custody and of Aboriginal deaths in custody, and the need to reduce the numbers of Aboriginal people held in custody (Closing the Gap, n.d.; Office of the Aboriginal and Torres Strait Islander Social Justice Commissioner, n.d.).

Additionally, some stakeholders expressed concern that removing the regulations could have negative impacts on community safety and the overall appeal of the Park Lands as a public space. Concern for community safety was reflected in the 2023 Dry Area consultation, where organisations that are first responders to anti-social behaviour, safety incidents and emergency responses were generally supportive of continuation of the regulations (City of Adelaide, 2023a).

For example, SA Police cited concern in their submission that the removal of the regulations would have a detrimental impact on community safety (City of Adelaide, 2023a). Concern for the overall appeal of the Park Lands was raised by CoA stakeholders consulted for the evaluation, who felt strongly that without the regulations there would be an increase in littering and vandalism. It was suggested this would lead to a higher workload for staff, increased costs for CoA and potentially a decline in the cleanliness of the Park Lands.

Despite mixed views regarding the effectiveness of the regulations (see Section 4) these findings reflect a general reluctance to remove the regulations due to concerns about potential negative impacts. The need for a strengthened service system to mitigate these negative impacts is further discussed in Section 6.

I would very strongly not be in favour of just stopping the regulations... I think that's going to cause a lot of harm for people as well. – SA Government stakeholder

THE REGULATIONS PROVIDE AN INCREASED SENSE OF SAFETY FOR SOME STAKEHOLDERS, INCLUDING TRADERS, COA WORKERS, AND LOCAL RESIDENTS

Notwithstanding varying perspectives on the effectiveness of the regulations, there was a firm belief among several stakeholders interviewed, including those representing SA Police, CoA and traders, that the regulations promote a sense of safety among people who work in and use the Park Lands. This sentiment was also reflected in community consultation undertaken by CoA in 2020 and 2023 via the YourSAy survey.

CoA stakeholders interviewed who work in the Park Lands described feeling considerably safer while working because of the regulations. They felt reassured in knowing they could contact police when they observed people consuming alcohol, and were confident the regulations send an important message to the wider community that alcohol consumption is not tolerated and can result in police enforcement. Similarly, local traders reported feeling reassured they could contact police if they observed people drinking alcohol during the hours/in the areas where it is restricted.

For me, as a worker, [24-hour dry area regulations throughout the Park Lands] would make me feel a lot safer every day and I know the residents probably feel the same way. – CoA stakeholder

The regulations are considered by SA Police as being an important tool in supporting police efforts to manage community expectations and enhance overall safety and wellbeing, helping to balance the complex interplay between maintaining public order and supporting vulnerable individuals such as those affected by substance abuse or mental health issues. One SA Police stakeholder interviewed identified a key benefit of the regulations is providing officers with the ability to mitigate behaviours that, while not always criminal, significantly impact community members' sense of safety. Interactions with individuals who are heavily alcohol-affected and who may also be experiencing mental health episodes have the potential to be distressing for the general public, including community and sporting groups who use the Park Lands. These interactions, although not necessarily resulting in crime statistics, can lead to a perception of a lack of safety and vulnerability. The regulations can support SA Police, particularly the Paragon Unit, to proactively manage behaviours that could be perceived as threatening by the wider community. One SA Police stakeholder reported the regulations help to prevent the escalation of negative perceptions about certain areas, reducing the chances of media stories or word-of-mouth reports that could lead to area being labelled 'unsafe'. This supports the wellbeing of the community by fostering a sense of security and encouraging the use of public spaces.

If there is someone who's heavily alcohol affected, who is being very loud and abusive and disruptive when a sporting group are trying to use an area of the Park Lands... people who have... been relatively sheltered or if they've not come across that kind of confronting behaviour before, they're going to be greatly affected by the interaction. That interaction is not going to generate a crime statistic, but it's going to affect their feeling of safety in that area. – SA Police stakeholder

Approximately one third (n=12) of CoA residents who responded to the 2023 YourSAy survey believed the Dry Areas regulations were important for maintaining public safety and amenity. Fifteen per cent (n=138) of respondents to the 2020 YourSAy survey indicated strong support for 24-hour Dry Area regulations throughout all the Adelaide Park Lands, with key reasons for support including:

- Making the Park Lands, in particular playgrounds, more family friendly.
- Reducing harassment and intimidation of Park Lands users by people who are intoxicated.

- Making the Park Lands safer and more accessible; and
- Reducing littering and the burden on Park Land staff to clean up after intoxicated people.⁵

Since the implementation of the dry area zone Veale Gardens has been a delight to visit. Less rubbish, no fights and anti-social behaviour. There have been nearly no call outs for police and or ambulance by local residents. Families have returned for picnics and enjoyment of this wonderful open space. – YourSAy survey respondent, 2023

⁵ The proportion of survey respondents who were local residents or residents of CoA could not be determined using the data provided.

6. SERVICE LANDSCAPE



KEY FINDINGS

- **There are a range of specialist services to support people experiencing problems with alcohol and drug use in the City of Adelaide local government area.** Over 20 services were identified providing a range of health, alcohol and other drug, housing, sobering up support and Aboriginal specific care.
- **Aboriginal rural and remote visitors to the Park Lands face particular challenges in accessing appropriate support.** Rural and remote visitors are disproportionately impacted by the regulations. They have a range of support needs, but face barriers in accessing services, including a lack of services targeted to this group that are in language and culturally safe.
- **Resourcing for services is insufficient to meet demand in response to the Park Lands Dry Areas.** Insufficient resourcing of services limits the capacity of services to respond after hours and to undertake assertive outreach. This means the service response after hours tends to be less person centred, trauma informed, and culturally safe.
- **A stronger service response is required to better support those impacted by the regulations regardless of whether the regulations are removed.** The regulations themselves are not sufficient to address alcohol-related crime and harm in the Park Lands given its complex and entrenched drivers and should be supported by a more intensive, multiagency service response with culturally appropriate preventative measures and holistic wrap-around support.
- **Future approaches should provide culturally safe, wrap-around support to meet the needs of those impacted by the regulations.** Additionally, a strengthened service response would involve better access to alcohol and other drug services and supports, housing and safe spaces, and services that operate after hours.

This section addresses the following evaluation questions:

- What is the current service and support landscape for people experiencing problems with alcohol or drug use in Adelaide?
- What additional services and supports would need to be established/expanded if the regulations were removed?

THERE ARE A RANGE OF SPECIALIST SERVICES TO SUPPORT PEOPLE EXPERIENCING PROBLEMS WITH ALCOHOL AND DRUG USE IN ADELAIDE

There are a range of specialist services to support people experiencing problems with alcohol and drug use in Adelaide. Urbis undertook a service mapping exercise to understand the current service provision landscape relevant to groups who use the Park Lands and are most impacted by the regulations.

This service mapping identified over 20 services and supports, broadly targeted to Aboriginal people (including remote visitors), people experiencing homelessness and poverty (including young people and people sleeping rough) and people requiring support for alcohol and other drug use. Commonly, services include provision of a safe place to sober up or drop in, or supportive accommodation (e.g., transitional, rehabilitation); health services; advocacy, referral and case

management; culturally safe services; and provision of basic needs (such as clothing and food). The results of the service mapping are presented in Appendix A.

To augment the service mapping, stakeholders interviewed were asked to describe the service landscape in response to the regulations. Stakeholders consistently identified the MAP bus, Safer Place to Gather, the Salvation Army Sobering Up Unit, and the Green Team volunteer patrol as the key services available to support people who drink alcohol in the Park Lands, suggesting greater awareness and likely high demand for these services. Operation Paragon was also frequently described as enabling a service response for this cohort. The capacity of services to meet demand is discussed below.

ABORIGINAL RURAL AND REMOTE VISITORS TO THE PARK LANDS FACE PARTICULAR CHALLENGES IN ACCESSING APPROPRIATE SUPPORT

Aboriginal people visiting from rural and remote areas, such as the APY lands and remote Northern Territory, are one of the core groups who use the Park Lands. Many stakeholders expressed concern they are disproportionately impacted by the regulations. As described above in Section 1.1, usage of the Park Lands by this group is driven by a variety of factors, including but not limited to the need to access health services in Adelaide, seasonal weather patterns, remote area alcohol restrictions, social participation and cultural and family responsibilities.

Let's say I've been brought down (to Adelaide from a remote area) by the Royal Flying Doctor. But then eventually, the rest of the family will come down... and once they get here, they really have no resources to go back home... And they don't have the capacity to be staying at the Comfort Inn or on North Terrace, for example, across the road from the Royal Adelaide. So they might stay in... hang around in the park lands. – ACCO/community organisation stakeholder

Consultation with community organisations and ACCOs highlighted the unique support and service needs for this group including safe accommodation, resources to be able to return to Country, and culturally safe service delivery. However, these stakeholders reported that rural and remote visitors often face challenges in accessing needed services. Among the 23 services identified in the service mapping, just ten were identified as specifically providing culturally safe services. Seven were targeted specifically to rural and remote visitors, however only two were identified as providing services in language. This suggests there are insufficient services with the capacity to meet the needs of this group.

Safer Place to Gather was established in 2023 in response to this unmet need. It followed the previously implemented Puti on Kurna Yerta, an outreach and case management service hub, which ran from October to December 2021 (Valente et al., 2022). Safer Place to Gather provides vulnerable remote Aboriginal visitors who are sleeping rough and impacted by alcohol use and health conditions a safe place to shelter, socialise and access culturally appropriate support (City of Adelaide, 2023a). There is some evidence of the effectiveness of Safer Place to Gather. DHS' submission to the 2023 consultation reported that since commencement, it has been well utilised by rural and remote visitors and has received positive feedback from agencies involved regarding its impact in reducing high risk behaviour and alcohol-related harm in the city (City of Adelaide, 2023a).

However, some CoA stakeholders interviewed recognised Safer Place to Gather has faced some challenges in its implementation including conflict between different groups utilising the service. It is also worth noting that Safer Place to Gather is managed by DHS (DHS, 2023), in contrast to Puti on Kurna Yerta which was culturally led (Valente et al., 2022). This was highlighted by CoA staff as a potential barrier to effective service delivery. Additionally, one ACCO/community services

stakeholder noted there are few public amenities including drinking water and toilets in this part of the Park Lands. No evaluation has been undertaken to date to assess the effectiveness and impact of Safer Place to Gather. Additionally, the initiative is intended to be a time limited response (City of Adelaide, n.d.-c), and as yet there are no similar services that could fill this gap (for a culturally safe service hub located in the CoA local government area).

RESOURCING FOR SERVICES IS INSUFFICIENT TO MEET DEMAND IN RESPONSE TO THE PARK LANDS DRY AREAS

Despite the range of services described above, their resourcing is insufficient to meet community needs and demand in the Park Land Dry Areas. Generally, stakeholders interviewed highlighted a reliance on under resourced services that regularly face high demand and complex client needs. Demand was noted to be particularly high during summer months due to a greater number of remote visitors to the Park Lands, in addition to other groups that utilise the Park Lands during summer. Some stakeholders, including SA Government and ACCOs/community organisations, reported instances of services (e.g., the MAP bus) being at capacity and having to turn people away. Under resourcing of services was highlighted in the 2014 and 2020 Dry Area consultations, where community members and organisations indicated constrained service capacity and the need for more funding for services (Adelaide City Council on 24/06/2014 City Wide Dry Area Review, 2014; City of Adelaide, 2020).

Many stakeholders, including ACCOs/community organisations, CoA and SA Police, reported that services are limited in their capacity to respond to alcohol-related behaviours in the Park Lands because they are often not operational overnight or on weekends. Constrained resourcing was highlighted as a key contributing factor to limited service hours. A commonly cited example was Paragon which does not operate after hours. The MAP bus hours were also commonly raised by stakeholders, however it should be noted that the service has recently increased its operating hours to run until 1:45am seven days per week, until the end of March 2025. The Green Team volunteer patrol, run by Encounter Youth, was identified anecdotally by one CoA stakeholder as the “only ones” doing harm minimisation after hours. Although there are services that do operate overnight and/or on weekends (for example the Salvation Army Sobering Up Unit, open 24/7), availability and capacity to respond after hours was considered largely limited across the service landscape, particularly amongst services providing an outreach or transportation service. Of the 23 services identified in Urbis’ service mapping exercise, just five are listed as operating after hours.

Some stakeholders from SA Government and ACCOs/community organisations emphasised that this gap means service responses after hours tend to be less person centred, trauma informed, and culturally safe.

This is because the ability to link people to services is restricted and the available policing response is not driven to the same extent by the highly relational approach considered a key enabler of Paragon (see Section 3). The impact of constrained resourcing on service hours was noted as particularly significant by a range of stakeholders because much alcohol consumption and related harm happens outside typical service hours, regardless of the timing of the Dry Areas (i.e., the 8pm-11am time ban).

Policing during daytime operational hours is always going to be a little bit different. During the day, police can access and direct people to different services. [They] could direct someone to the MAP bus, you can encourage them to access Safer Place to Gather, returning to tenancies... potentially taking them to the sobering up unit or getting outreach out to help. At nighttime... when the MAP bus is no longer operating, when outreach is no longer operating, I think the policing response [is very] different. – SA Government stakeholder

A STRONGER SERVICE RESPONSE IS REQUIRED TO BETTER SUPPORT THOSE IMPACTED BY THE REGULATIONS REGARDLESS OF WHETHER THE REGULATIONS ARE REMOVED

A stronger service response is needed to support people with drug and alcohol use in the Park Lands, regardless of any changes to the regulations. It was acknowledged by the majority of stakeholders that the regulations themselves are not sufficient to address alcohol-related crime and harm in the Park Lands given its complex and entrenched drivers. Despite mixed views regarding the appropriateness of the regulations, the need for a stronger service response, involving increased funding and more services, was emphasised.

This was a view validated by previous consultations. The 2020 Dry Area consultation found a key theme expressed by a range of stakeholders was that the regulations were not adequate to resolve the issues experienced in the Park Lands and that they should not exist in isolation (City of Adelaide, 2020). Stakeholders who provided feedback in the 2023 Dry Area consultation similarly expressed that the regulations are not themselves a solution and additional long-term strategies to address complex social needs are required (City of Adelaide, 2023a).

FUTURE APPROACHES SHOULD PROVIDE CULTURALLY SAFE, WRAP-AROUND SUPPORT TO MEET THE NEEDS OF THOSE IMPACTED BY THE REGULATIONS

There are specific approaches that are needed to provide a stronger service response in addressing alcohol-related behaviour and harm in the Park Lands. These are described below.

Culturally safe services

Cultural safety was highlighted by many stakeholders including CoA, SA Police and ACCOs/community organisations, as a crucial element in strengthening the service response. This was highlighted given these stakeholders felt the regulations disproportionately impact Aboriginal community members and remote visitors. As noted above, service mapping suggests there are few such services available; out of the 23 services identified, ten were identified as providing culturally safe services and two as providing services in language.

Some SA Police and CoA stakeholders interviewed referenced Puti on Kurna Yerta as evidence of the potential benefits to be gained from a culturally safe service. The evaluation of Puti on Kurna Yerta reflects this.

It found positive outcomes in service engagement and decreased assault and disorderly conduct offences and attributed its successes largely to its focus on cultural leadership and the centring of culturally safe delivery throughout (Valente et al., 2022).

Although community stakeholders were not included in Puti on Kurna Yerta's evaluation, the need for culturally safe services was commonly identified by a range of stakeholders, including community, in previous Dry Area consultations (City of Adelaide, 2020, 2023b). ACCO and community organisation stakeholders interviewed reported the value in having cultural safety embedded as business as usual in any service response addressing alcohol-related behaviour and harm in the Park Lands. In particular, they emphasised the value of cultural safety being embedded in policing responses from a lived experience perspective.

Wrap-around, coordinated services and assertive outreach

The need for a service response that provides wrap-around, holistic support was also emphasised in lived experience, SA Health and ACCO/community organisation consultations, in the context of the intersecting health and social needs that contribute to alcohol-related behaviours and harm. Many services identified in service mapping (16 services) provide some form of referral, care coordination or support to access services, though the extent to which support is wrap-around (i.e., coordinated and integrated) is varied. Service hours and referral criteria limit the accessibility of these services.

The value of a multi-agency coordinated response to provide wrap-around support was highlighted by a range of stakeholders interviewed, as well as in previous consultation. DHS' 2023 submission described the positive impacts achieved through a range of multi-agency coordinated responses in recent years in addition to Safer Place to Gather, including multi-agency assertive outreach teams to coordinate supports (DHS, 2023). South Australia's Closing the Gap plan indicates that in 2024 the assertive outreach teams were still operational (Government of South Australia, 2024) however ongoing commitment is unclear.

Similarly, Puti on Kurna Yerta was identified by CoA and SA Police stakeholders as an example of an effective response that provided wrap-around support. The Puti on Kurna Yerta evaluation found its coordinated, multi-agency approach to service provision helped to address the needs of clients holistically (Valente et al., 2022). A few SA Government stakeholders additionally emphasised the potential benefits of a co-located service hub in mitigating barriers to access for this group, suggesting that it is easier for people to attend services when they are located centrally.

Alcohol and other drug support

Also commonly raised in consultations was the demand for alcohol and other drug services. This included that additional harm reduction facilities be made available in the Park Lands, such as syringe disposal and more drinking water. A few stakeholders including CoA, lived experience and ACCO/community organisations emphasised the use of drugs in the Park Lands as a problem that often intersects with harmful alcohol use, and the lack of accessible harm reduction measures (such as syringe disposal, access to affordable meals and drinking water). DASSA's needle and syringe program has numerous facilities in the CoA and surrounding suburbs that provide sterile needles and syringes, sharps disposal containers and disposal facilities, information, education and referral for people who inject drugs (SA Health, 2024). No facilities are located in the Park Lands themselves, except for sharps disposal located in public toilets (SA Health, 2024).

Additionally, ACCO/community organisation and SA Government stakeholders suggested more managed alcohol programs and detox services are needed. Service mapping identified six culturally safe alcohol and other drug services.

From the information available, it was not evident that identified services provide any managed alcohol programs, although Safer Place to Gather allows supervised alcohol consumption in select hours.

The Supervised Alcohol Provision Program (SAPP), a managed alcohol program targeted toward Aboriginal people with alcohol use and piloted for 12 months in 2023 by Drug and Alcohol Services South Australia (DASSA), was identified as a successful model by SA Government stakeholders. SAPP's evaluation found that participants valued a safe space to reduce their alcohol intake at a self-determined pace. Broadly, participants reported positive experiences of the program and that they were motivated to return if it were continued (Bertossa et al., 2024). This indicates demand for such a program.

Housing and safe spaces

As described above in Section 1, lack of access to housing is a key driver contributing to alcohol-related behaviours and harm in the Park Lands. Some stakeholders, including lived experience and ACCOs/community organisations, emphasised this, noting that for people without housing the Park Lands are living and gathering spaces where alcohol is invariably consumed. Some ACCO/community organisation stakeholders identified that a lack of housing or accommodation and/or supports to access housing/ accommodation means that even though people may be able to access other services, they are likely to cycle back into homelessness and alcohol use. This gap is demonstrated by the service mapping which found just six of 23 services provide housing and homelessness support, and of these, two that provide culturally safe accommodation.

Housing was highlighted as a primary need that precedes the ability to address alcohol and other drug use or other needs. The need for housing and safe spaces is further evidenced in the SAPP evaluation. SAPP participants typically included remote Aboriginal visitors from South Australia and the Northern Territory who frequent social drinking circles and camps established in the Park Lands. Interviews with SAPP participants described access to a safe space as a key attracter to the program, allowing a break from being in the Park Lands or houses where Aboriginal people were congregating to drink. Participants frequently noted they felt these spaces to be unsafe and increased exposure to alcohol and other drugs (Bertossa et al., 2024).

Services to fill all hours

As described above, the reduced service availability after hours and on weekends was identified by stakeholders to be a significant barrier in responding to alcohol-related behaviours and harm in the Park Lands. This was also reflected in the service mapping which found just four services operate after hours. The need for services that operate after hours is again highlighted.

7. CONCLUSIONS AND RECOMMENDATIONS

7.1. CONCLUSION

The regulations were introduced as a trial in 2014 to address alcohol-related harm and improve public amenity in the Park Lands. Since this time, the regulations have been extended on multiple occasions, although their effectiveness and impact on different groups are not well understood. Multiple reviews conducted by the CoA have highlighted the polarity of views among stakeholders, as well as gaps in quantitative evidence available to support informed decision-making on the regulations.

Based on available evidence analysed for this evaluation, the regulations have been well implemented with well-defined roles and responsibilities for awareness raising, enforcement, encouraging compliance and decision making. Most stakeholders consulted reported the regulations are an important tool which enable SA Police to intervene and de-escalate anti-social behaviour early, thereby preventing a justice response. SA Police rarely issue fines to those in breach of the regulations, instead using their discretion to tip out alcohol containers and issue warnings. Stakeholders praised the efforts of SA Police, and Operation Paragon in particular, in working collaboratively with relevant agencies to support positive outcomes for potentially vulnerable community members.

While most stakeholders supported an extension of the regulations, the inconsistent time spans of the Dry Areas were a point of contention. The rationale for the 24/7 ban in Parks 20 and 21 is not well understood, suggesting a need for greater transparency in decision making.

Current data collection mechanisms are inadequate to measure the effectiveness of the regulations in achieving the intended objectives. Some stakeholders felt the regulations helped to reduce crime and improve amenity while others felt the regulations made no difference, citing frequent breaches of the regulations and examples of vandalism, assault and harassment by people consuming alcohol in the Park Lands. CoA staff, local traders and local residents reported the regulations foster a sense of safety for workers and visitors in the Park Lands. They highlighted the regulations send a clear message that excessive alcohol consumption is not tolerated, and felt reassured knowing they could report breaches to police when necessary. Despite these mixed views, there was strong agreement that the regulations alone do not adequately address the underlying drivers of alcohol-related harm.

A range of services and supports operate in Adelaide to support people with alcohol and other drug issues and who may be impacted by the regulations. However, resourcing and access to these services is insufficient to meet demand and there is a need for more culturally safe, wrap-around support, particularly for rural and remote visitors to Adelaide. The current situation is the result of entrenched social issues, and a significant, system-level response is needed before the regulations can be lifted.

7.2. RECOMMENDATIONS

Based on evaluation findings, there are nine recommended actions to strengthen the response to alcohol-related incidents in the Park Lands. The table overleaf sets out the recommended actions across four themes, the rationale for each action, lead organisation and potential partners, and proposed timing for implementation.

The themes are:

- Regulation continuation.
- Strengthen regulation implementation.
- Decision-making informed by robust data and evaluation.
- Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes.

The recommended actions acknowledge the complex drivers of problematic alcohol consumption in the Park Lands and the need for a multiagency, partnership approach to implement meaningful change. The actions have been developed as a suite of complementary and reinforcing strategies, with a strong rationale for implementing all recommendations concurrently.

Table 5 – Recommended actions

Recommended actions	Rationale	Roles and responsibilities	Timing
Regulation continuation			
1. Extend the current regulations for a further three years.	The regulations are generally supported as a useful tool for intervening to reduce alcohol-related harm and to promote public safety. Extending the regulations for a further three years will provide sufficient time for the development and implementation of a robust Data Strategy (see recommended action 6). Any decision to extend the regulations beyond this should be based on a thorough evaluation (see recommended action 7).	Lead: Minister for Small and Family Business, Consumer and Business Affairs, and Arts/Consumer and Business Services	2025-2026
2. Assess lifting the 24/7 ban in Area 2 (Parks 20 and 21) to be consistent with the restrictions in Area 1, once the necessary data collection processes are in place (see recommendation 6 below).	A number of stakeholders including local residents have questioned the rationale of the 24/7 ban in Area 2. Any changes to the regulations should be supported by robust data collection arrangements to ensure effective tracking of the impact and efficacy of the change and to provide an evidence base to inform decision making.	Lead: Minister for Small and Family Business, Consumer and Business Affairs, and Arts/Consumer and Business Services	After data collection process established by SA Government and operational
Strengthen implementation regulation			
3. Develop and implement clear guidelines and protocols for the enforcement of the	Responses by SA Police to alcohol-related incidents in the Park Lands may vary	Lead: Minister for Police	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
regulations to ensure consistency and minimise biases.	depending upon the officer attending, time of day, location and situation. A standardised protocol is important to ensure consistent implementation of the regulations regardless of the time of day or week and will also assist to manage stakeholder expectations.	Partners: SA Police, Safety and Wellbeing Taskforce	
4. Expand resources for Operation Paragon, the dedicated SA Police unit focused on addressing alcohol-related anti-social behaviour through a multi-agency approach, to increase the number of trained officers and to broaden the operational hours of this unit.	There is broad consensus that the relational and harm reduction focus of Operation Paragon delivers positive outcomes for those consuming alcohol in the Park Lands and to the broader community. Resource constraints limit Operation Paragon's ability to attend the Park Lands during weeknights and over the weekends. While all SA Police is responsible for enforcement of the regulations, this recommendation aims to enhance the capacity of Operation Paragon specifically, acknowledging its unique role and approach.	Lead: SA Police Partners: ACCOs and community organisations	2025-2026
5. Implement a co-design approach to develop a public awareness strategy about the regulations and services available.	Awareness of the regulations is believed to be mixed among people accessing the Park Lands, including young people and rural and remote visitors, particularly those new to Adelaide. A refreshed awareness strategy should include additional or updated signage throughout the Park Lands that indicates the time spans of Dry Areas. The strategy should also consider use of Aboriginal language and	Lead: Consumer and Business Services Partners: ACCOs, CoA and community organisations	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	include promotion of specialist services (e.g., youth services, Aboriginal-led services).		
Decision-making informed by robust data and evaluation			
6. Develop a Data Strategy to enhance data collection arrangements and to effectively track the impact of the regulations and other complementary strategies over time. This should be underpinned by a Memorandum of Understanding between relevant parties.	The current understanding of the regulations' effectiveness is limited due to a lack of comprehensive data collection over the past ten years. While qualitative data has provided valuable insights, there is a need for more quantitative data to fully assess the efficacy of the regulations and to inform decision-making about the effectiveness of other supporting strategies. Qualitative and quantitative data are crucial for triangulating findings and developing a holistic understanding of the regulations' effectiveness and impact. A robust Data Strategy will need to articulate purpose, scope and underlying research questions aligned to intended outcomes for different stakeholder groups to inform data collection arrangements and roles and responsibilities, including governance and formalised data sharing arrangements between partner agencies. Future data collection of alcohol-related incidents in the Park Lands should consider the inclusion of basic demographic data of individuals, the time/date of incidents and exact geographic	Lead: Department of Human Services (DHS) Partners: SA Police, South Australian Ambulance Service (SAAS), Safety and Wellbeing Taskforce, CoA, community organisations and ACCOs	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	location. The Data Strategy should align with the broader Evaluation Framework.		
7. Conduct an evaluation of the implementation and effectiveness of the regulations and supporting strategies, commencing at least one year before expiration.	The regulations must be reviewed with due consideration of broader contextual factors and the range of supporting strategies in place. Future evaluations should be informed by improved data collection arrangements and a longer timeline to enable the conduct of stakeholder consultations including those with lived experience of the regulations. Future evaluations may also consider an assessment of the economic costs and benefits of the regulations in conjunction with a range of supporting strategies.	Lead: DHS Partners: Safety and Wellbeing Taskforce	At least one year before expiration 2026-2027
Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes			
8. In close collaboration with community organisations and ACCOs, further investigate the design and delivery of tailored and intensive wrap-around support services to better support people who access the Park Lands experiencing challenges related to alcohol and other drugs, homelessness and chronic health and wellbeing issues. This should include:	While there are a range of alcohol and other drug, housing and health support services operating in Adelaide, they are currently under resourced to meet the needs of complex and chronic challenges of people who access the Park Lands. In particular, there is currently a lack of assertive outreach services and culturally safe and appropriate services in language.	Lead: DHS Partners: Community organisations and ACCOs	Commencing 2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
▪ assertive outreach services to connect people to relevant supports and provide ongoing case management ▪ support after hours and on weekends ▪ culturally appropriate and safe services for Aboriginal rural and remote visitors including appropriate in-language services			
9. Co-design, with Kurna Elders and local community, a culturally safe gathering place for Aboriginal people including Aboriginal people from rural and remote areas. The gathering place should provide facilities for visitors and facilitate connections with specialist services (see recommendation 8). The place should be run and managed by Aboriginal organisations in ongoing partnership with the Kurna community.	There is currently no designated culturally safe place for Aboriginal rural and remote visitors to gather in the CoA local government area. The evaluation of the Puti on Kurna Yerta, supported by stakeholder consultations, provides evidence of the benefit of an Aboriginal-run gathering space where cultural connection can be fostered and remote visitors can access a range of alcohol and other drug services, housing and specialist supports. There is an opportunity to learn from this model and further promote connection to culture, Country and community which are well-established protective factors for Aboriginal communities.	Lead: Safety and Wellbeing Taskforce Partners: DHS, CoA, Drug and Alcohol Services South Australia (DASSA)	Commencing 2025-2026

SOURCES

Aboriginal Sobriety Group. (n.d.-a). *Mobile Assistance Patrol*. Retrieved February 5, 2025, from <https://asg.org.au/mobile-assistance-patrol-map/>

Aboriginal Sobriety Group. (n.d.-b). *WAASHS Homelessness*. Retrieved February 13, 2025, from <https://asg.org.au/homelessness/>

Adelaide City Council. (2014). *City Wide Dry Area Report 2014*. Client supplied document.

Adelaide City Council on 24/06/2014 City Wide Dry Area Review. (2014).

Bertossa, S., Pedler, M., Barry, N., & Brumby, A. (2024). *Patient experience of the Supervised Alcohol Provision Program (SAPP) Trial—Final Report*. Flinders University.

City Community Services and Culture Committee. (2023). *Adelaide Park Lands Dry Area Regulation Review*. Client supplied document.

City of Adelaide. (n.d.-a). *Adelaide Park Lands Management Strategy Towards 2036*. <https://meetings.cityofadelaide.com.au/documents/s22638/Attachment%20A%20for%20Adelaide%20Park%20Lands%20Management%20Strategy%20-%20Towards%202036%20for%20Finalisation.pdf>

City of Adelaide. (n.d.-b). *Request for Quote—Adelaide Park Lands Dry Area Regulations Evaluation Project*.

City of Adelaide. (n.d.-c). *Safer Place to Gather, Edwards Park Update*. Client supplied document.

City of Adelaide. (2020). *Dry Area Consultation Summary Adelaide Park Lands January to February 2020*.

City of Adelaide. (2023a). *Adelaide Park Lands Dry Area Regulation Consultation Summary Version 24 October 2023*.

City of Adelaide. (2023b). *Adelaide Park Lands Dry Area regulation review*. <https://meetings.cityofadelaide.com.au/documents/s14199/Adelaide%20Park%20Lands%20Dry%20Area%20Extension.pdf>

Closing the Gap. (n.d.). *7B. Table B: Outcome 10 | Closing the Gap*. Retrieved February 11, 2025, from <https://www.closingthegap.gov.au/national-agreement/national-agreement-closing-the-gap/7-difference/b-targets/b10>

Department of Health. (2019). *National Alcohol Strategy 2019–2026*. Commonwealth of Australia. <https://www.health.gov.au/sites/default/files/documents/2020/11/national-alcohol-strategy-2019-2028.pdf>

DHS. (2023). *Letter from CE - Adelaide Park Lands Dry Area Consultation—Oct 2023*. Client supplied document.

DHS. (2023, May 26). *Exceptional Needs Unit (South Australia) [Collection]*. DHS. <https://dhs.sa.gov.au/how-we-help/exceptional-needs-unit>

Encounter Youth. (n.d.). *Hindley Street Program*. Encounter Youth. Retrieved February 13, 2025, from <https://www.encounteryouth.com.au/hindley-street-program/>

Government of South Australia. (2014, December 14). *Dry Areas* (South Australia). <https://www.sa.gov.au/topics/family-and-community/safety-and-health/liquor/dry-areas>

Government of South Australia. (2023, June 22). *Police mobilise extra resources for CBD response* (South Australia) [Text]. Premier of South Australia. <https://www.premier.sa.gov.au/media-releases/news-archive/police-mobilise-extra-resources-for-cbd-response>

Government of South Australia. (2024). *Closing the Gap—South Australia’s Implementation Plan 2024-26*.

Government of South Australia. (n.d.). *Rural and remote patient support*. Royal Adelaide Hospital. Retrieved February 13, 2025, from <https://www.rah.sa.gov.au/patients-and-visitors/rural-and-remote-patient-support>

Hutt St Centre. (2025). *Hutt St Centre*. <https://www.huttstcentre.org.au/>

Know Your Options. (n.d.). *Aboriginal Sobriety Group Indigenous Corporation – Substance Misuse....* Know Your Options. Retrieved February 13, 2025, from <https://knowyouroptions.sa.gov.au/service/aboriginal-sobriety-group-substance-misuse-program-all-metro>

Know Your Options. (n.d.). *Drug and Alcohol Services (SA) – Aboriginal Connection Program –....* Know Your Options. Retrieved February 13, 2025, from <https://knowyouroptions.sa.gov.au/service/drug-and-alcohol-services-sa-aboriginal-connection-program-adelaide-metro>

Mission Australia. (2024). *Partners Toward Wellbeing*. <https://www.missionaustralia.com.au/servicedirectory/185-alcohol-other-drugs/partners-toward-wellbeing1>

Multicultural Youth Education & Development Centre. (n.d.). *What’s On: The City West Hub – Multicultural Youth SA*. Retrieved February 13, 2025, from <https://www.mysa.com.au/whatson/the-city-west-hub>

Nunkuwarrin Yunti. (n.d.). *Our Services. Nunkuwarrin Yunti - Aboriginal and Torres Strait Islander Health and Community Services*. Retrieved February 13, 2025, from <https://nunku.org.au/our-services/>

Office of the Aboriginal and Torres Strait Islander Social Justice Commissioner. (n.d.). *Indigenous Deaths in Custody: Report Summary | Australian Human Rights Commission* [Australian Human Rights Commission]. Retrieved February 11, 2025, from <https://humanrights.gov.au/our-work/indigenous-deaths-custody-report-summary>

Royal Adelaide Hospital. (2025a). *Aboriginal & Torres Strait Islander Health and Wellbeing Hub*. Royal Adelaide Hospital. <https://www.rah.sa.gov.au/health-professionals/clinical-services/allied-health/aboriginal-health-unit>

Royal Adelaide Hospital. (2025b). *Patient Assistance Transport Scheme*. Royal Adelaide Hospital. <https://www.rah.sa.gov.au/patients-and-visitors/coming-to-or-visiting-hospital/patient-assistance-transport-scheme-pats>

SACommunity. (2023). *Adelaide Day Centre for Homeless Persons Inc. | SACommunity—Connecting Up Australia*. https://sacommunity.org/org/201373-Adelaide_Day_Centre_for_Homeless_Persons_Inc

SACommunity. (2024). *Aboriginal Sobriety Group Inc. | SACommunity—Connecting Up Australia*. https://sacommunity.org/org/201489-Aboriginal_Sobriety_Group_Inc.

SACommunity. (2025). *Magdalene Centre | SACommunity—Connecting Up Australia*. https://sacommunity.org/org/202262-Magdalene_Centre

SA Government. (2025) *Dry Areas*. Available at <https://www.sa.gov.au/topics/business-and-trade/liquor/general-public/dry-areas>. (Accessed 3 March 2025).

SA Health. (2024). *Needle and syringe program*. <https://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/services/mental+health+and+drug+and+alcohol+services/drug+and+alcohol+services/dassa+services/needle+and+syringe+program>

SA Housing Trust. (2024, August 19). *Wali Wiru “good homes” program policy* (South Australia) [Text]. SA Housing Trust. <https://www.housing.sa.gov.au/about-us/policies/wali-wiru-good-homes-program-policy>

SYC. (n.d.). *The Foundry by SYC*. SYC. Retrieved February 13, 2025, from <https://www.syc.net.au/south-australia/the-foundry>

The Salvation Army Australia. (n.d.). *Sobering Up Unit | The Salvation Army Australia* [Text]. The Salvation Army Australia. Retrieved February 13, 2025, from <https://www.salvationarmy.org.au/locations/south-australia/towards-independence/sobering-up-unit/>

Uniting Communities. (n.d.). *Aboriginal Community Connect*. Retrieved February 13, 2025, from <https://www.unitingcommunities.org/service/aboriginal-services/aboriginal-community-connect>

Uniting Communities. (n.d.-a). *Kurlana Tampawardli*. Retrieved February 13, 2025, from <https://www.unitingcommunities.org/service/aboriginal-services/kurlana-tampawardli>

Uniting Communities. (n.d.-b). *Supporting you + your family through rehabilitation*. Retrieved February 13, 2025, from <https://www.unitingcommunities.org/service/counselling/alcohol-and-other-drugs/new-roads>

Valente, C., Baldock, P., Tually, S., & Goodwin-Smith, I. (2022). *Puti on Kaurna Yerta Evaluation Report – April 2022*. Department of Human Services and Centre for Social Impact Flinders.

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APPENDIX A SERVICE MAPPING

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
Royal Adelaide Hospital	Rural Liaison Nurse	Eligibility criteria	Business hours	City of Adelaide	Rural/ remote Aboriginal visitors	- Transport - Community based follow up	Health and transport service
Aboriginal Sobriety Group	Substance Misuse Team	Requires referral	Business hours	City of Adelaide	Aboriginal people who use alcohol and other drugs	- Referral, care coordination, or support to access services - Assessment of needs - Counselling - Advocacy - Rehabilitation	Alcohol and other drug services
Aboriginal Sobriety Group	Cyril Lindsay House and Annie Koolmatrie House	Info not available	Info not available	Suburbs further from Park Lands	Aboriginal people experiencing homelessness	Access to housing/ accommodation	Housing and homelessness
Aboriginal Sobriety Group	Western Adelaide Aboriginal Specific Homelessness Service	Info not available	Business hours	Suburbs further from Park Lands	Aboriginal people experiencing homelessness	- Culturally safe service - Referral, care coordination, or support to access services - Access to housing/accommodation - Engagement and guidance from Aboriginal elder and community	Housing and homelessness

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
Aboriginal Society Group	Mobile Assistance Patrol (MAP)	No referral needed	After hours (last service at 1:45am), 7 days per week until end March 2025. Generally last service 12am.	City of Adelaide	- Intoxicated people - Aboriginal people - Rural/remote Aboriginal visitors	- Transport - Safe place to sober up - Culturally safe service	Transport and sobering up service
Anglicare	The Magdalene Centre	Dependent on service	Business hours	City of Adelaide	People experiencing poverty	- Housing and homelessness support - Legal aid - Counselling - Provision of essential amenities	Anti-poverty services
DASSA	Aboriginal Connection Program	Requires referral, client must meet criteria to be considered	Business hours	Suburb in close proximity to Park Lands	- Aboriginal people who use alcohol and other drugs - Aboriginal people experiencing homelessness	- Assessment of needs - Outreach - Referral, care coordination, or support to access services	Alcohol and other drug services
DASSA	Needle and syringe program	No referral	Dependent on service	City of Adelaide Suburbs - No facilities in Park Lands themselves	People with substance use	- Harm reduction facilities - Referral, care coordination, or support to access services - Provision of information	Alcohol and other drug services

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
DHS	Exceptional Needs Unit, Homelessness Support Program	Referral required from organisations and service only	Business hours	Suburb in close proximity to Park Lands	People with complex needs	Assessment of needs	Assessment and advice
Encounter Youth	Hindley Street Green Team Program	No referral needed	After hours	City of Adelaide	Intoxicated people	- Street patrol - Referral, care coordination, or support to access services - Safe interaction	Street patrol
Hutt St Centre	Hutt St Centre	Intake and assessment for some services	Business hours	City of Adelaide	People experiencing homelessness	- Legal aid - Provision of basic needs or amenities - Referral, care coordination, or support to access services - Peer support - Crisis assistance - Connection to education and employment opportunities	Housing and homelessness
Mission Australia	Partners Toward Wellbeing	Requires referral	Business hours	Suburb in close proximity to Park Lands	- People with mental health concerns - People who use alcohol and other drugs	- Counselling - Referral, care coordination, or support to access services - Culturally safe service - Peer support	Alcohol and other drug services

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
Multicultural Youth Education & Development Centre	The City West Hub	No referral needed	After hours	City of Adelaide	Young people	- Safe space - Assessment of needs - Transport	After-hours crisis service
Nunkuwarrin Yunti	Health and wellbeing services (variety of services)	Dependent on service	Business hours	City of Adelaide Suburbs	Aboriginal people	- Health services - Alcohol and other drug services - Referral, care coordination, or support to access services - Counselling - Provision of essential amenities - Culturally safe service	Health service
Royal Adelaide Hospital	Aboriginal & Torres Strait Islander Health and Wellbeing Hub (Hub)	No referral needed	Business hours	City of Adelaide	- Rural/remote Aboriginal visitors - Aboriginal people	- Culturally appropriate service - Referral, care coordination, or support to access services - Advocacy - Provision of amenities - Aboriginal language interpreters/ service specifically for Aboriginal language speakers	Health and referral service
Royal Adelaide Hospital	Patient assistance transport scheme	Eligibility criteria	Info not available	City of Adelaide	Rural/remote Aboriginal visitors	Transport	Transport

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
SA Housing Trust	Wali Wiru (Good Homes) Program	Requires referral	Info not available	Metro	Rural/remote Aboriginal visitors	- Access to housing/accommodation - Culturally safe service - Aboriginal language interpreters/ service specifically for Aboriginal language speakers	Housing
Service to Youth Council (SYC)	The Foundry by SYC	Requires referral	Business hours	City of Adelaide	Young people who are experiencing housing insecurity	- Social support - Life skills programs - Provision of basic needs or amenities - Safe space - Referral, care coordination, or support to access services	Housing and homelessness
Sister Janet Mead's Adelaide Day Centre for Homeless Persons	Adelaide Day Centre	Requires referral	Business hours	City of Adelaide	People experiencing homelessness	- Rehabilitation - Provision of information - Referral, care coordination, or support to access services - Provision of basic needs or amenities - Housing and homelessness support	Housing and homelessness

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
The Salvation Army	The Salvation Army Sobering-up Unit	No referral needed	24/ 7	City of Adelaide	Intoxicated people	▪ Safe place to sober up ▪ Assessment of needs ▪ Referral, care coordination, or support to access services ▪ Provision of basic needs or amenities ▪ Advocacy ▪ Provision of information	Sobering up service
Uniting Communities	Kurlana Tampawardli	Info not available	Dependent on service - Crisis accommodation operates 24 hours	Suburbs further from Park Lands	Aboriginal people Rural/ remote Aboriginal visitors	▪ Crisis accommodation ▪ Transitional accommodation ▪ Safe return to Country ▪ Referral, care coordination, or support to access services ▪ Culturally safe services ▪ Outreach	Culturally safe housing and homelessness
Uniting Communities	Aboriginal Community Connect	Requires referral	Business hours	Multiple locations including suburbs close to Park Lands	Aboriginal people People who use alcohol and other drugs	▪ Rehabilitation ▪ Culturally safe service ▪ Referral, care coordination, or support to access services	Alcohol and other drug service

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
Uniting Communities	New ROADS	Dependent on service	Business hours	City of Adelaide (counselling) Suburbs rehabilitation	People who use alcohol and other drugs	- Rehabilitation - Detox - Counselling - Culturally safe service - Referral, care coordination, or support to access services	Rehabilitation
DHS	Safer Place to Gather	No referral needed	Info not available	City of Adelaide	Aboriginal people who use alcohol and other drugs Aboriginal people experiencing homelessness Rural/ remote Aboriginal visitors	- Culturally safe service - Referral, care coordination, or support to access services - Supervised alcohol provision program	Services hub

