



CITY COMMUNITY SERVICES AND CULTURE COMMITTEE

Agenda and Reports

for the meeting on

Tuesday, 1 April 2025

at 7.00 pm

in the Colonel Light Room, Adelaide Town Hall

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Our Adelaide.
Bold.
Aspirational.
Innovative.

CITY COMMUNITY SERVICES AND CULTURE COMMITTEE
Meeting Agenda, Tuesday, 1 April 2025, at 7.00 pm

Members – The Right Honourable the Lord Mayor, Dr Jane Lomax-Smith
Councillor Snape (Chair)
Councillor Giles (Deputy Chair)
Deputy Lord Mayor, Councillor Elliott and Councillors Abrahamzadeh, Couros, Davis, Hou, Li,
Martin, Noon and Dr Siebentritt

Agenda

Item	Pages
1. Acknowledgement of Country	
At the opening of the City Community Services and Culture Committee meeting, the Chair will state:	
‘Council 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.’	
2. Apologies and Leave of Absence	
Leave of Absence - Councillor Li	
3. Confirmation of Minutes - 4/3/2025	
That the Minutes of the meeting of the City Community Services and Culture Committee held on 4 March 2025, be taken as read and be confirmed as an accurate record of proceedings.	
View public 4 March 2025 Minutes.	
4. Declaration of Conflict of Interest	
5. Deputations	
6. Workshops	
Nil	
7. Reports for Recommendation to Council	
7.1 Adelaide Park Lands Dry Area Regulation Review	4 - 77
7.2 Draft Cultural Policy 2025-2036 and Consultation Summary	78 - 95
8. Reports for Noting	
Nil	
9. Exclusion of the Public	96 - 97
In accordance with sections 90(2),(3) and (7) of the <i>Local Government Act 1999</i> (SA) the Council will consider whether to discuss in confidence the reports contained within section 10 of this Agenda.	

10.	Confidential Reports for Recommendation to Council	
10.1	Arts and Culture Music Festival 2025, Bartels Road Closure [S90(3) (d)]	98 - 110
11.	Closure	

Adelaide Park Lands Dry Area Regulation Review

Strategic Alignment - Our Places

Public

Tuesday, 1 April 2025

City Community Services and Culture Committee

Program Contact:

Sarah Gilmour, Associate Director Park Lands, Policy & Sustainability

Approving Officer:

Ilia Houridis, Director City Shaping

EXECUTIVE SUMMARY

The purpose of this report is to present the findings and recommended actions of the Adelaide Park Lands Dry Area Regulation Evaluation (the evaluation) and seek Council authorisation to submit a request to the Minister for Consumer and Business Affairs to extend the Adelaide Park Lands Dry Area Regulation for a further three years from 22 June 2025 to 22 June 2028.

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 / Waylu 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.

On 15 April 2024, the Department of Human Services (DHS) advised the City of Adelaide (CoA) that after thorough consideration it had determined that the scope of the evaluation extends beyond the remit of the Safety and Wellbeing Taskforce, led by DHS.

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.

A Chief Executive Officer briefing was held with Council Members on 18 March 2025 to share and discuss the evaluation findings and recommended actions.

This report recommends that the CoA apply to the State Government to extend the existing Adelaide Park Lands Dry Areas until 22 June 2028. It also requests that the State Government work with the CoA to develop a plan for implementing the recommended actions to commence from 2025/26.

The following recommendation will be presented to Council on 8 April 2025 for consideration

THAT THE CITY COMMUNITY SERVICES AND CULTURE COMMITTEE RECOMMENDS TO COUNCIL
THAT COUNCIL

1. Notes the Adelaide Park Lands Dry Area Regulation Evaluation report as contained in Attachment A to Item 7.1 on the Agenda for the meeting of the Community Services and Culture Committee held on 1 April 2025.
 2. Authorises the Chief Executive Officer, or delegate, to prepare and submit an application to the State Government to extend the current arrangements for the Adelaide Park Lands Dry Areas 1 (8pm on each day to 11am on the following day) and Area 2 (continuous) for a further three years until 22 June 2028.
 3. Authorises the Chief Executive Officer, or delegate, 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 AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	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</i> (SA).
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.
24/25 Budget Allocation	Not as a result of this report
Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	Not as a result of this report
24/25 Budget Reconsideration (if applicable)	\$115,390 reallocation of existing strategic project budgets once the State Government advised it would not lead the evaluation.
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

Background

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.
2. In 2021, Blue Gum Park / Kurangga (Park 20) and Veale Park / Waylu Yarta (Park 21) became Dry Areas 24 hours a day, seven days a week. The Dry Area was established in response to ongoing impact on residential amenity in this location due to excessive alcohol consumption by large groups and associated challenging behaviours.
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, would include:
 - 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.
 - 3.2. A report on the wrap-around services delivered by the State Government in support of the Dry Area.
4. The restrictions outlined above are depicted spatially in Figure 1:

City of Adelaide Dry Zone Map

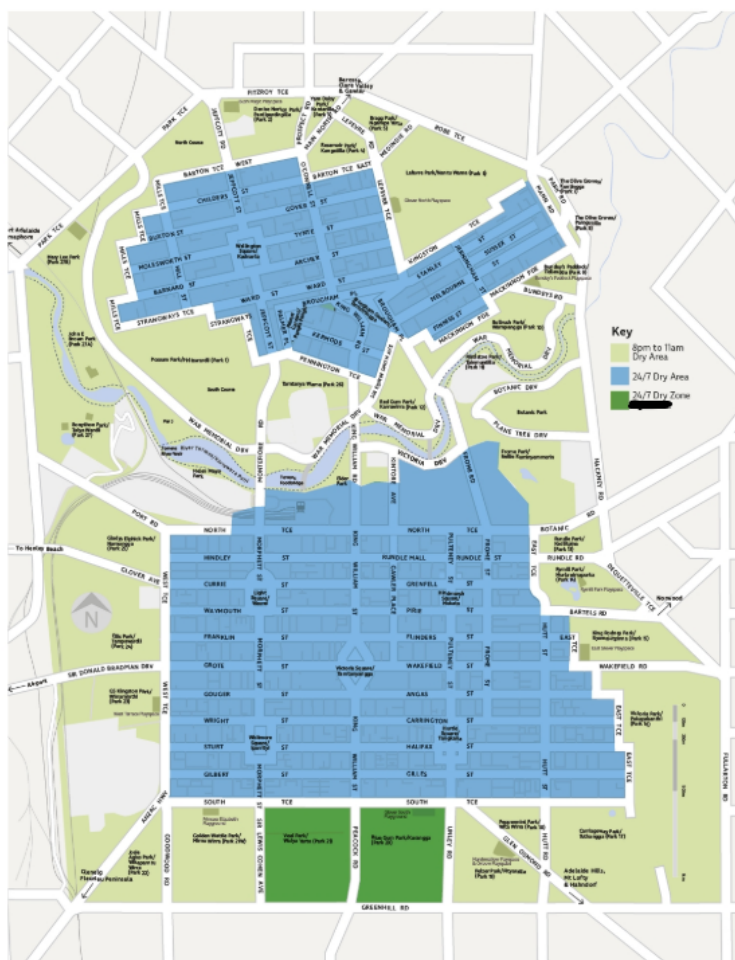


Figure 1: Adelaide Park Lands Dry Areas as at 1 April 2025

- 4.1. On 5 December 2023, the City of Adelaide (CoA) requested that the Safety and Wellbeing Taskforce, led by the Department of Human Services (DHS), lead the evaluation of the Adelaide Park Lands Dry Area Regulation.
- 4.2. On 15 April 2024, the 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.

Project purpose and methodology

5. 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.
6. The evaluation assessed the:
 - 6.1. 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.
 - 6.2. Effectiveness of the Regulation in reducing alcohol related crime and harm, and improving public amenity.
 - 6.3. 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 CoA employees working in the Adelaide Park Lands.
 - 6.4. The current wrap-around services delivered by the SA Government and social service organisations in support of the Dry Areas.
7. 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.

Evaluation findings

8. The evaluation report is provided in **Attachment A**. The key findings of the evaluation are divided into four areas as follows:
 - 8.1. Implementation of the Regulation
 - 8.1.1. 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 aware of the specific bans.
 - 8.1.2. 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 of tipping alcohol out as an intervention measure.
 - 8.1.3. Enablers for successfully implementing the Regulation include the approach of SA Police; inter-agency collaboration and having culturally safe gathering places.
 - 8.1.4. Two potential barriers to effective implementation of the Regulation is appropriate service support and awareness of the Regulation among community members.
 - 8.1.5. 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.
 - 8.2. Effectiveness of the Regulation
 - 8.2.1. 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.
 - 8.2.2. There are mixed views about the extent to which the Regulation helps to reduce alcohol-related harm and crime and improve public amenity.

- 8.2.3. The Regulation alone is insufficient to reduce alcohol-related harm and crime in the Adelaide Park Lands, which will persist until the underlying drivers related to substance use, health, housing and employment are addressed.
- 8.2.4. The ability to responsibly consume alcohol in the Adelaide Park Lands is viewed as important for upholding the personal rights of residents and visitors.
- 8.3. Impact of the Regulation
 - 8.3.1. There is concern among some stakeholders that the Regulation disproportionately impacts marginalised communities, including people experiencing homelessness and those from remote communities.
 - 8.3.2. 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.
 - 8.3.3. The Regulation increases the 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.
- 8.4. Service Landscape
 - 8.4.1. There is a range of specialist services to support people experiencing problems with alcohol and drug use in the City of Adelaide.
 - 8.4.2. 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.
 - 8.4.3. Challenges can be experienced by people seeking to access appropriate services and supports for their needs.
 - 8.4.4. Future approaches should provide culturally safe, wrap-around support and a service response that improves access services including alcohol and other drug services and supports, housing and safe spaces, and services that operate after hours.

Recommended actions

- 9. There are nine recommended actions arising from the evaluation to support the effective implementation of the Regulation and better community outcomes. Some of the recommendations have resource implications for State Government Agencies.
- 10. The City of Adelaide has met with relevant State Government Agencies to share the findings and recommendations, and to discuss policy and resourcing implications.
- 11. Recommended actions are organised under the following four themes:
 - 11.1. Regulation continuation
 - 11.1.1. 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.
 - 11.1.2. 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.
 - 11.2. Strengthen Regulation implementation
 - 11.2.1. Develop and implement clear guidelines and protocols for enforcing the Regulation to ensure consistency and minimise biases.
 - 11.2.2. Ensure that 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.
 - 11.2.3. Develop a public awareness strategy about the Regulation and services available. A refreshed awareness strategy should consider the use of signage, Aboriginal language and include the promotion of specialist services (e.g. youth services, Aboriginal-led services).

- 11.3. Decision-making informed by robust data and evaluation
 - 11.3.1. Develop a Data Strategy to enhance data collection arrangements and effectively track the impact of the Regulation and other complementary strategies over time.
 - 11.3.2. Conduct an evaluation of the implementation and effectiveness of the Regulation and supporting strategies, commencing at least one year before expiration.
- 11.4. Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes.
 - 11.4.1. 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.
 - 11.4.2. 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.

Next steps

12. Pending a decision by the Council to extend the Adelaide Park Lands Dry Area Regulation, the process for requesting an extension is:
 - 12.1. The Chief Executive Officer applies to the State Government via Consumer and Business Services and the Commission for Liquor and Gambling.
 - 12.2. The Liquor and Gambling Commissioner will review the application and make a recommendation to the Minister for Consumer and Business Affairs.
 - 12.3. If approved by the Minister, the Dry Area Regulation is made by public notice in the Government Gazette.
13. Should an extension to the Adelaide Park Lands Dry Area Regulation be approved, Administration will:
 - 13.1. 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.
 - 13.2. Advise engagement participants of the outcome of the Adelaide Park Lands Dry Area Regulation Evaluation.
 - 13.3. Update information on the City of Adelaide website.
 - 13.4. Continue to work in partnership with State Government Agencies and other stakeholders, where appropriate, to support the implementation of the recommendations.

ATTACHMENTS

Attachment A –Adelaide Park Lands Dry Area Regulations Evaluation Report Urbis

- END OF REPORT -

URBIS

ADELAIDE PARK LANDS DRY AREA REGULATION EVALUATION

Final Report

Prepared for
CITY OF ADELAIDE
21 March 2025

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Christina Bagot
Senior Consultant	Greta Newman, Madeleine Ridgeway & Shannay Holmes (Cox Inall Ridgeway)
Consultant	Olivia Geehan
Project Code	P0056199
Report Number	Final



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.

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

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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You must read the important disclaimer appearing within the body of this report.

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CONTENTS

Executive summary	1
1. Introduction	11
1.1. The Adelaide Park Land Dry Area Regulation.....	11
1.2. Evaluation drivers.....	15
2. The evaluation	16
2.1. Purpose and scope.....	16
2.2. Evaluation questions	17
2.3. Methodology	18
3. Implementation of the Regulation	22
4. Effectiveness of the Regulation.....	28
5. Impact of the Regulation	33
6. Service landscape	38
7. Conclusions and recommendations	44
7.1. Conclusion	44
7.2. Recommendations	45
Sources.....	51
Disclaimer	54

TABLES

Table 1 – Recommended actions.....	6
Table 2 – Evaluation domains and questions	17
Table 3 – Data sources	18
Table 4 – Implementation strategies and roles.....	23
Table 5 – Recommended actions	46

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 Regulation	Adelaide Park Lands Dry Area Regulation
SA	South Australia
SAAS	South Australian Ambulance Service
SACAD	South Australian Computer Aided Dispatch
SAPP	Supervised Alcohol Provision Program

EXECUTIVE SUMMARY

INTRODUCTION

The Regulation

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 Regulation ('the Regulation') was established as a trial to address the impacts of alcohol-related behaviour in the Park Lands for the local community. The Regulation makes 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 Regulation has 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.

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.

THE EVALUATION

Aims

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

- Implementation of the Regulation, 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 Regulation in reducing alcohol-related crime and harm and improving public amenity.
- Impact of the Regulation 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 Regulation (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 Regulation, 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 Regulation	▪ Overall, the Regulation has been implemented well. Stakeholders agreed on clear roles and good public awareness of the Regulation, 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 Regulation is viewed as a 'tool' for intervening and reducing alcohol-related crime and harm in the Park Lands. Stakeholders saw the Regulation 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. ▪ SA Police's approach, inter-agency collaboration and culturally safe gathering places all support the implementation of the Regulation. Enablers for successfully implementing the Regulation include the approach of SA Police; inter-agency collaboration and having culturally safe gathering places. ▪ Two potential barriers to the effective implementation of the Regulation are appropriate service support and community member awareness of the Regulation. ▪ 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 ban as a balanced approach.

Evaluation domain	Key findings
Effectiveness of the Regulation	▪ There is insufficient quantitative data available to demonstrate the efficacy of the Regulation. Inconsistent data collection and sharing by first responders since 2014 have made it difficult to assess the Regulation's effectiveness. As a result, stakeholders have had to rely on limited and anecdotal evidence. ▪ There are mixed views about the extent to which the Regulation helps 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 Regulation's impact, and most agreed improvements in public amenity were likely due to the relocation of groups to other areas within Adelaide. ▪ The Regulation alone is 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. ▪ The ability to responsibly consume alcohol in the Adelaide Park Lands is viewed as important for upholding the personal rights of community members.
Impact of the Regulation	▪ There is concern among some stakeholders that the Regulation disproportionately impacts marginalised communities, including people experiencing homelessness and those from remote communities. ▪ Most stakeholders agree 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 deescalate problematic drinking was emphasised and valued. ▪ The Regulation provides an increased sense of safety for some stakeholders, including traders, CoA workers and residents, who believe the Regulation enhances safety for workers and users of the Park Lands by allowing SA 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 CoA 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. ▪ Challenges can be experienced by people seeking to access appropriate services and supports for their needs. This includes people with complex needs and Aboriginal rural and remote visitors to the Park Lands that require specialised supports and services that are in language and culturally safe. ▪ The Regulation relies on resourcing for services to meet demand in response to the Park Lands Dry Areas. The service response after hours tends to be less person centred, trauma informed, and culturally safe. ▪ Future approaches should provide culturally safe, wrap-around support and a 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 Regulation for a further three years.	The Regulation is generally supported as a useful tool for intervening to reduce alcohol-related harm and to promote public safety. Extending the Regulation 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 Regulation 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 (8pm to 11am), once the data collection methods are well established (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 Regulation 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 Regulation to ensure consistency and minimise biases.	Responses by SA Police to alcohol-related incidents in the Park Lands may vary depending upon the officer attending, time of day, location and situation. A standardised protocol is important to ensure consistent implementation of the Regulation regardless of the time of day or week and will also assist to manage stakeholder expectations.	Lead: SA Police	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
4. Ensure that 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.	There is broad consensus that the relational and harm reduction focus of SA Police via Operation Paragon delivers positive outcomes for those consuming alcohol in the Park Lands and to the broader community.	Lead: SA Police Partners: ACCOs and community organisations	2025-2026
5. Develop a public awareness strategy about the Regulation and services available.	Awareness of the Regulation 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 the use of Aboriginal language and include promotion of specialist services (e.g., youth services, Aboriginal-led services).	Lead: Consumer and Business Services Partners: ACCOs, CoA and community organisations	2025-2026
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 Regulation and other complementary strategies over time.	The current understanding of the Regulation's 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 Regulation and to inform decision-making about the effectiveness of other supporting strategies. Qualitative and quantitative data are crucial for triangulating findings	Lead: Department of Human Services (DHS) / CoA Partners: SA Police, South Australian Ambulance Service (SAAS), CoA, community	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	and developing a holistic understanding of the Regulation' 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 location. The Data Strategy should align with the broader Evaluation Framework.	organisations and ACCOs	
7. Conduct an evaluation of the implementation and effectiveness of the Regulation and supporting strategies, commencing at least one year before expiration.	The Regulation 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 Regulation. Future evaluations may also consider an assessment of the economic costs and benefits of the Regulation in conjunction with a range of supporting strategies.	Lead: DHS / CoA Partners: SA Police, South Australian Ambulance Service (SAAS), CoA, community organisations and ACCOs	At least one year before expiration 2026-2027

Recommended actions	Rationale	Roles and responsibilities	Timing
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: ▪ 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	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
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: DHS Partners: CoA, Drug and Alcohol Services South Australia (DASSA) and ACCOs	Commencing 2025-2026

1. INTRODUCTION

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

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

- **Section 1: Introduction** provides an overview of the background and context for the Regulation 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 Regulation and the appropriateness of the Dry Area time span.
- **Section 4: Effectiveness** explores the extent to which the Regulation helps to reduce alcohol-related crime and harm and improve public amenity.
- **Section 5: Impact** explores the impact of the Regulation 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 Regulation, including gaps in service provision.
- **Section 7: Conclusion and recommendations** provides a summary of evaluation findings and recommendations for implementation of the Regulation.

1.1. THE ADELAIDE PARK LAND DRY AREA REGULATION

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 REGULATION

The Regulation has been in place since 2014, when it was 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 Regulation 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 Regulation 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 Regulation to June 2025. As shown in Figure 1, the specific Regulation currently in place is:

- 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

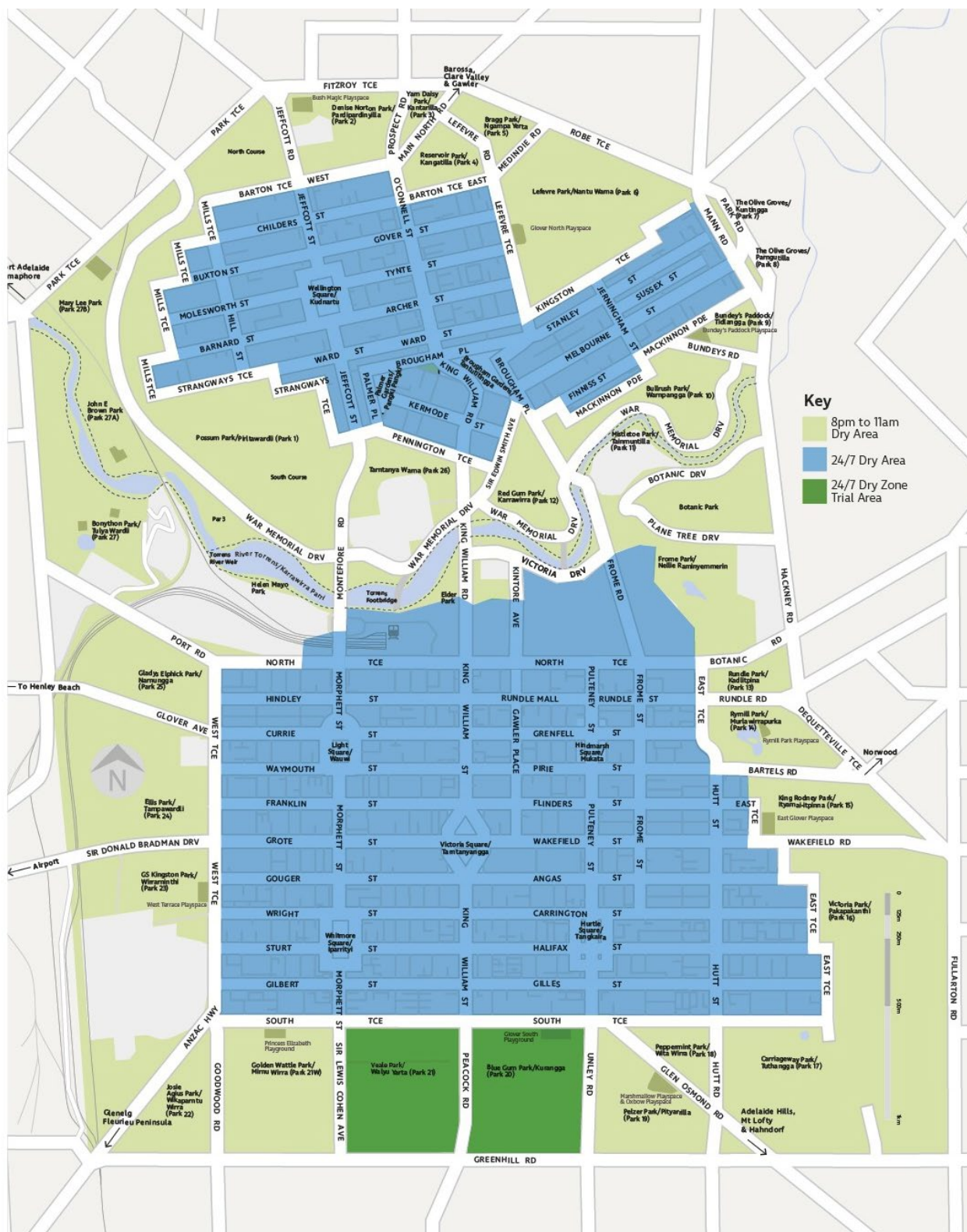
The purpose of the Regulation is to curb alcohol-related problems in the Park Lands. The Regulation helps CoA to manage the use of the Park Lands and provide safe and accessible spaces for recreation and activities such as walking, running, quiet contemplation, picnicking and gathering socially (City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

The Regulation makes 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 Regulation 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 Park 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 Regulation is 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 Regulation is perceived by Aboriginal communities, who may view them as extensions of historical oppression rather than protective measures.

Community and stakeholder views on the Regulation

Several rounds of consultation conducted by CoA have demonstrated the polarity of views held by community and stakeholders regarding the Regulation since it was 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 Regulation 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 Regulation is 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 Regulation 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 Regulation

In recognition of these concerns, strategies have been undertaken to minimise the negative impacts of the Regulation 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 / Wirrarninthe (Park 23). It is operated by the Department of Human Services (City of Adelaide, n.d.-c).

1.2. EVALUATION DRIVERS

While the Regulation has been in operation for ten years, its effectiveness is not well understood. The SA Government and CoA have committed to monitoring and evaluating the Regulation to understand its 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 Regulation. 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 Regulation, and to provide recommendations about its continuation and potential alternative measures that support positive outcomes for all community members and stakeholders.

The evaluation aimed to assess:

- 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) over at least the past 12 months. Earlier implementation will be considered as relevant.
- Effectiveness of the Regulation in reducing alcohol-related crime and harm and improving public amenity.
- Impact of the Regulation 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 Regulation 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 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) over at least the past 12 months. Earlier implementation will be considered as relevant.	- What strategies have been used in the implementation of the Regulation? (e.g., enforcement, communications and awareness, administration, resources and training, decision making processes) - What other strategies and services support the implementation of the Regulation? - How well has the Regulation been implemented? - What have been the barriers and enablers to successful implementation of the Regulation? - How appropriate is the Dry Area time span to meet the objectives?
Effectiveness Effectiveness of the Adelaide Park Lands Dry Area Regulation in reducing alcohol-related crime and harm and improving public amenity.	- To what extent does the Regulation help to reduce alcohol-related crime and harm? - To what extent does the Regulation help to improve public amenity?
Impact Impact of the Adelaide Park Lands Dry Area Regulation 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 Regulation on the target groups? - To what extent does the Regulation address and balance the perspectives of different groups? - Are there any unintended consequences from the Regulation? - What would be the impact of removing the Regulation for the different target groups? - If the Regulation is removed, what alternatives are there? - Do the benefits of implementing the Regulation 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 Regulation was 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 Regulation. 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 Regulation (n=2). ▪ Traders operating in or near the Park Lands Area 2 ³ (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 Regulation, 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 Regulation, the impact of the Regulation, 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 Regulation, 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 Regulation, and provide insight, implementation, effectiveness and impact of the Regulation. 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.

Data source	Detail
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. ▪ 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 Regulation 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 Regulation, 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 Regulation. 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 Regulation 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 REGULATION



KEY FINDINGS

- **Overall, the Regulation has been implemented well.** Stakeholders agreed on clear roles and good public awareness of the Regulation, 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 Regulation is viewed as a ‘tool’ for intervening and reducing alcohol-related crime and harm in the Park Lands.** Stakeholders saw the Regulation 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.
- **SA Police’s approach, inter-agency collaboration and culturally safe gathering places all support the implementation of the Regulation.** Enablers for successfully implementing the Regulation include the approach of SA Police; inter-agency collaboration and having culturally safe gathering places.
- **Two potential barriers to the effective implementation of the Regulation** are appropriate service support and community member awareness of the Regulation.
- **There are mixed views about the appropriateness of the Dry Area time span to meet the Regulation’s objectives.** Most people interviewed 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 Regulation? (e.g., enforcement, communications and awareness, administration, resources and training, decision making processes)
- What other strategies and services support the implementation of the Regulation?
- How well has the Regulation been implemented?
- What have been the barriers and enablers to successful implementation of the Regulation?
- How appropriate is the Dry Area time span to meet the objectives?

OVERALL, THE REGULATION HAS BEEN IMPLEMENTED WELL

Stakeholders consulted for the evaluation generally agreed the Regulation has 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 Regulation 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 specifics of the Regulation, 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 Regulation, 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 Regulation.

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 Regulation based on data and community feedback. The SA Government is responsible for approving amendments to the Regulation 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 Regulation, including record-keeping, reviewing the Regulation, community engagement, requesting amendments to the Regulation and coordination with other stakeholders. The SA Government is responsible for considering amendments to the Regulation and coordination with other stakeholders.
Communications and awareness	CoA is responsible for ensuring awareness of the Regulation 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 Regulation.
Enforcement	SA Police is responsible for enforcing the Regulation, 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 Regulation. 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 Regulation.

Source: Stakeholder interviews and documentation provided by CoA

THE REGULATION IS VIEWED AS A 'TOOL' FOR INTERVENING AND REDUCING ALCOHOL-RELATED CRIME AND HARM IN THE PARK LANDS

Many stakeholders viewed the Regulation as an important tool for intervening and reducing alcohol-related crime and harm and maintaining safety in the Park Lands. The Regulation provides 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 Regulation. Officers also have the authority to search individuals they suspect are in violation of the Regulation 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 Regulation. 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 Regulation 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 [Regulation] 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 Regulation as a 'tool' for managing anti-social behaviour is described further in Section 5.

SA POLICE'S APPROACH, INTER-AGENCY COLLABORATION AND CULTURALLY SAFE GATHERING PLACES ALL SUPPORT THE IMPLEMENTATION OF THE REGULATION

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 get to know people, to have those ongoing relationships. – SA Police stakeholder

Inter-agency collaboration

Collaboration between agencies to support people impacted by the Regulation 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 Regulation.

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 Regulation 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 REGULATION

Resourcing constraints

Limited resources have constrained the ability of SA Police and support services to ensure comprehensive enforcement of the Regulation 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 Regulation. 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 Regulation

Stakeholders suggested some community members may not be fully aware of the Regulation 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 Regulation and highlighted the need for additional signage.

I don't think I actually knew what the Regulation fully [was] 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 REGULATION'S OBJECTIVES

As outlined in Section 1.1, the current Regulation prohibits 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 Regulation, 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 Regulation 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 REGULATION



KEY FINDINGS

- **There is insufficient quantitative data available to demonstrate the efficacy of the Regulation.** Inconsistent data collection and sharing by various agencies, including first responders since 2014 have made it difficult to assess the Regulation's effectiveness. As a result, stakeholders have had to rely on limited and anecdotal evidence.
- **There are mixed views about the extent to which Regulation helps 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 Regulation's impact, and most agreed improvements in public amenity were likely due to relocation of groups to other areas within Adelaide.
- **The Regulation alone is 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.
- **The ability to responsibly consume alcohol in the Park Lands is viewed as important** for upholding the personal rights of community members.

This section addresses the following evaluation questions:

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

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

Inconsistent data collection and data sharing arrangements have been in place since the introduction of the Regulation 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 Regulation, 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 Regulation 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 10:59am 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 REGULATION HELPS 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 Regulation has 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 Regulation, 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 Regulation has 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 Regulation was 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 Regulation is 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 Regulation [doesn't] impact decision making or behaviours of the population [homeless] that we're working with. – ACCO/ Community organisation stakeholder

[The Regulation is] probably not really working. [The Dry Areas] 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 Regulation is 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 [the] Regulation, if that makes sense. – SA Government stakeholder

I think in one way we can look at [Regulation] 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 Regulation held the view that the Regulation was 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 Regulation 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 REGULATION ALONE IS 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

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

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 [Regulation]. – 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

5. IMPACT OF THE REGULATION



KEY FINDINGS

- There is concern among some stakeholders that the Regulation disproportionately impacts marginalised communities, including people experiencing homelessness and those from remote communities.
- 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 deescalate problematic drinking was emphasised and valued.
- The Regulation provides an increased sense of safety for some stakeholders, including traders, CoA workers and local residents, who believed the Regulation enhances safety for workers and users of the Park Lands by allowing SA 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 Regulation on the target groups?
- To what extent does the Regulation address and balance the perspectives of different groups?
- Are there any unintended consequences from the Regulation?
- What would be the impact of removing the Regulation for the different target groups?
- If the Regulation is removed, what alternatives are there?
- Do the benefits of implementing the Regulation outweigh the associated costs?

THERE IS CONCERN AMONG SOME STAKEHOLDERS THAT THE REGULATION DISPROPORTIONATELY IMPACTS MARGINALISED COMMUNITIES

This evaluation identified a range of concerns relating to how the Regulation 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 Regulation, 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 Regulation 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 the Regulation 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 Regulation] dislocate[s] 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 Regulation has 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 Regulation means 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 Regulation 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 the Regulation.

[When dry area Regulation 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 Regulation can be enforced inconsistently and in a manner which could potentially be discriminatory. It was suggested that under the Regulation, 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 the Regulation causes 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 the Regulation disproportionately affects people experiencing homelessness as well as the Aboriginal and Torres Strait Islander communities who traditionally gather and socialise in the Park Lands.⁴

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

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

The potentially detrimental impact of the Regulation on individuals who misuse substances was also noted by stakeholders from two drug and alcohol-focused organisations. They raised concerns the Regulation 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 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 REGULATION WITHOUT 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 Regulation 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 Regulation 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 Regulation] ... 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 Regulation 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 Regulation was 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 Regulation 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 Regulation (City of Adelaide, 2023a).

For example, SA Police cited concern in their submission that the removal of the Regulation 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 Regulation 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 Regulation (see Section 4) these findings reflect a general reluctance to remove the Regulation 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 Regulation... I think that's going to cause a lot of harm for people as well. – SA Government stakeholder

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

Notwithstanding varying perspectives on the effectiveness of the Regulation, there was a firm belief among several stakeholders interviewed, including those representing SA Police, CoA and traders, that the Regulation promotes 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 Regulation. They felt reassured in knowing they could contact police when they observed people consuming alcohol, and were confident the Regulation sends 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, [a 24-hour dry area Regulation 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 Regulation is 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 Regulation 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 Regulation 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 Regulation helps 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 Regulation was important for maintaining public safety and amenity. Fifteen per cent (n=138) of respondents to the 2020 YourSAy survey indicated strong support for a 24-hour Dry Area Regulation 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 CoA 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.
- Some people face challenges accessing appropriate services and supports for their needs. This includes people with complex needs and Aboriginal rural and remote visitors to the Park Lands that require specialised supports and services that are in language and culturally safe.
- The Regulation relies on resourcing for services to meet demand in response to the Park Lands Dry Areas. The service response after hours tends to be less person centred, trauma informed, and culturally safe.
- Future approaches should provide culturally safe, wrap-around support and a 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 Regulation was 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 Regulation.

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 Regulation. 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 Regulation. 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 REGULATION REGARDLESS OF WHETHER THE REGULATION IS 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 Regulation. It was acknowledged by the majority of stakeholders that the Regulation itself is 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 Regulation, 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 Regulation was not adequate to resolve the issues experienced in the Park Lands and that it should not exist in isolation (City of Adelaide, 2020). Stakeholders who provided feedback in the 2023 Dry Area consultation similarly expressed that the Regulation is not 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 REGULATION

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 Regulation disproportionately impacts 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 attractor 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 Regulation was introduced as a trial in 2014 to address alcohol-related harm and improve public amenity in the Park Lands. Since this time, the Regulation has been extended on multiple occasions, although its effectiveness and impact on different groups is 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 Regulation.

Based on available evidence analysed for this evaluation, the Regulation has been well implemented with well-defined roles and responsibilities for awareness raising, enforcement, encouraging compliance and decision making. Most stakeholders consulted reported the Regulation is an important tool which enables 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 Regulation, 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 Regulation, 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 Regulation in achieving the intended objectives. Some stakeholders felt the Regulation helps to reduce crime and improve amenity while others felt the Regulation makes no difference, citing frequent breaches of the Regulation and examples of vandalism, assault and harassment by people consuming alcohol in the Park Lands. CoA staff, local traders and residents reported the Regulation fosters a sense of safety for workers and visitors in the Park Lands. They highlighted the Regulation sends 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 Regulation alone does 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 Regulation. 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 Regulation 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 Regulation for a further three years.	The Regulation is generally supported as a useful tool for intervening to reduce alcohol-related harm and to promote public safety. Extending the Regulation 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 Regulation 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 (8pm to 11am), once the data collection methods are well established (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 Regulation 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 Regulation to ensure consistency and minimise biases.	Responses by SA Police to alcohol-related incidents in the Park Lands may vary depending upon the officer attending, time of day, location and situation. A standardised protocol is important to ensure consistent implementation of the Regulation regardless of the time of day or week and will also assist to manage stakeholder expectations.	Lead: SA Police	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
4. Ensure that 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.	There is broad consensus that the relational and harm reduction focus of SA Police via Operation Paragon delivers positive outcomes for those consuming alcohol in the Park Lands and to the broader community.	Lead: SA Police Partners: ACCOs and community organisations	2025-2026
5. Develop a public awareness strategy about the Regulation and services available.	Awareness of the Regulation 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 the use of Aboriginal language and include promotion of specialist services (e.g., youth services, Aboriginal-led services).	Lead: Consumer and Business Services Partners: ACCOs, CoA and community organisations	2025-2026
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 Regulation and other complementary strategies over time.	The current understanding of the Regulation's 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 Regulation and to inform decision-making about the effectiveness of other supporting strategies. Qualitative and quantitative data are crucial for triangulating findings	Lead: Department of Human Services (DHS) / CoA Partners: SA Police, South Australian Ambulance Service (SAAS), CoA, community	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	and developing a holistic understanding of the Regulation' 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 location. The Data Strategy should align with the broader Evaluation Framework.	organisations and ACCOs	
7. Conduct an evaluation of the implementation and effectiveness of the Regulation and supporting strategies, commencing at least one year before expiration.	The Regulation 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 Regulation. Future evaluations may also consider an assessment of the economic costs and benefits of the Regulation in conjunction with a range of supporting strategies.	Lead: DHS / CoA Partners: SA Police, South Australian Ambulance Service (SAAS), CoA, community organisations and ACCOs	At least one year before expiration 2026-2027

Recommended actions	Rationale	Roles and responsibilities	Timing
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: ▪ 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	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
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: DHS Partners: CoA, Drug and Alcohol Services South Australia (DASSA) and ACCOs	Commencing 2025-2026

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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	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
				Lands themselves			
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

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
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
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

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
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
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

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
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
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	Suburbs further from Park Lands	Aboriginal people	▪ Crisis accommodation ▪ Transitional accommodation	Culturally safe housing

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
			operates 24 hours		Rural/ remote Aboriginal visitors	- Safe return to Country - Referral, care coordination, or support to access services - Culturally safe services - Outreach	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
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



Draft Cultural Policy 2025-2036 and Consultation Summary

Strategic Alignment - Our Community

Public

Agenda Item 7.2

Tuesday, 1 April 2025

City Community Services and Culture Committee

Program Contact:

Jennifer Kalionis, Associate Director City Culture

Approving Officer:

Jo Podoliak, Director City Community

EXECUTIVE SUMMARY

The purpose of this report is to seek Council endorsement of the draft Cultural Policy 2025–2036 (the Policy) to proceed to final public consultation beginning in mid-April for 21 days in accordance with Council's Community Consultation Policy.

Development of the Policy delivers on the Strategic Plan 2024-2028 target to develop a Cultural Policy that promotes and supports the City's unique cultural identity and opportunities.

Over 1,000 community members and key stakeholders have engaged in the Stage 1 consultation process affirming that Adelaide's cultural future is shaped by its rich heritage (with the Park Lands a major distinctive asset), strong community identity, networked and vibrant arts scene, with equity, accessibility, and sustained investment through partnership key to its success.

The Policy sets out five principles that align with Council's Strategic Plan 2024-2028:

- Amplifying our Creative Capital
- Culturally Inclusive and Socially Connected
- Reconciliation and Truth-Telling
- Preserving Cultural Heritage, Embracing Progress
- Creating Space for Cultural Expression.

The Policy proposes key priorities for each principle and roles for the City of Adelaide (CoA), including its subsidiaries, in supporting cultural vitality with a shared organisational commitment to governance, sustainability, innovation, collaboration and equity.

A final version of the Policy will be presented to Council in June 2025 for adoption.

RECOMMENDATION

The following recommendation will be presented to Council on 8 April 2025 for consideration

THAT THE CITY COMMUNITY SERVICES AND CULTURE COMMITTEE RECOMMENDS TO COUNCIL THAT COUNCIL

1. Endorses the draft Cultural Policy 2025-2036 for public consultation contained in Attachment A to Item 7.2 on the Agenda for the meeting of the City Community Services and Culture Committee held on 1 April 2025.
2. Notes the consultation summary and feedback contained in Attachment B to Item 7.2 on the Agenda for the meeting of the City Community Services and Culture Committee held on 1 April 2025.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Community Our Objective is to support our communities to thrive, create fun, lively and interesting experiences and celebrate and honour community and cultures. This Policy delivers on a key strategic deliverable in that Strategic Plan that is to: <i>Develop a Cultural Policy by 2024 that promotes and supports the City's unique cultural identity and opportunities</i>. The Policy will also support the pillars of Council's Strategic Plan: Our Environment, Our Economy and Our Places.
Policy	Council does not currently have a Cultural Policy.
Consultation	Extensive consultation has been undertaken from November 2024 to March 2025 with the Community, key industry stakeholders and Council's committees and Boards. A consolidated consultation summary is presented in Attachment B to this report.
Resource	Development and consultation associated with the draft Cultural Policy 2025-2036 (the Policy) is through existing resources.
Risk / Legal / Legislative	Not as a result of this report.
Opportunities	Alignment with Federal and State policies and strategic partnerships across government, private, and community sectors will enable opportunities to seek external funding.
24/25 Budget Allocation	\$22,500 has been expended on the Policy development to date.
Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	The Policy is a 10-year framework from 2025 to 2036.
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

1. As a key action in its Strategic Plan 2024-2028, Council has committed to, 'Develop a Cultural Policy by 2024 that promotes and supports the City's unique cultural identity and opportunities.' Responsibility for the implementation of the Cultural Policy will extend to all areas of Council including subsidiaries.
2. The draft Cultural Policy 2025-2036 (the Policy) provided in **Attachment A** has been developed following a five-month period of extensive consultation from November 2024 to March 2025 on the Discussion Paper, *Culture - The Life Of Our City*. A high-level summary of the consultation feedback is provided in **Attachment B**, and a comprehensive summary of consultation feedback is available at [Link 1](#).
3. The Policy has been shaped through this consultation and research, incorporating insights from feedback, and benchmarking against international, national, and local government cultural policies and strategies.

Consultation and Community Engagement

4. Council endorsed consultation on the Discussion Paper, *Culture - The Life Of Our City* on 15 October 2024. This consultation took place between 4 November 2024 and 5 March 2025.
 - 4.1. Consultation activities included two stakeholder forums (200 attendees), eight community drop-in sessions (226 participants), five engagements with City of Adelaide Advisory Groups and Subsidiaries, eleven submissions, and a 51-day Our Adelaide online survey period (675 responses), ensuring broad input from residents, workers, business owners, visitors, and students.
 - 4.2. Forum participants reflected Adelaide's diverse and interconnected cultural landscape, including community, cultural and business leaders, universities and high schools, major cultural institutions, festivals, live music venues, creative practitioners and performers, policy developers and planners, peak bodies, precinct, residents and other advocacy groups.
 - 4.3. When asked to define their participation in city life, survey respondents had the opportunity to choose more than one option, reflecting that some individuals can have multiple key relationships with the City: 29% resident (49% of these were longtime residents of 10+ years), 41% City worker, and 52% visitors to the City.
 - 4.4. The survey included diverse voices, including Aboriginal and Torres Strait Islander participants (15), culturally diverse respondents (68), people living with disabilities (81), and LGBTIQ+ participants (112).

Access and Inclusion Advisory Panel

5. On 27 November 2024, Administration sought feedback from the Access and Inclusion Advisory Panel, and received the following feedback:
 - 5.1. Align the Draft Cultural Policy with the 'Four Year Focus' commitment in the Disability Access and Inclusion Plan 2024-2028, specifically to "provide opportunities for artists and people with disability in arts and culture and embed this in the City of Adelaide Cultural Policy".
 - 5.2. Promote an inclusive definition of culture that addresses intersectionality.
 - 5.3. Showcase inclusive events such as Feast Festival's Picnic in the Park and the Christmas Tree Lighting, recognising them as examples of best practices in promoting inclusivity in cultural events.

Adelaide Economic Development Agency

6. Administration sought feedback from the Adelaide Economic Development Agency and its Board and received the following feedback:
 - 6.1. Culture is an extremely important element of the City's economy; it is a key part of our brand and a reason why significant numbers of people come into the city.
 - 6.2. The cultural sector is responsible for many elements that AEDA seeks to encourage—including events and festivals, Adelaide's cultural institutions, public art, music, and education.
 - 6.3. CoA's Economic Development Strategy seeks for Adelaide to be Australia's festival and creative capital, which will require significant investment and focus if it is to move from its current position.
 - 6.4. AEDA has been tasked with enabling events and experiences of every size and scale, as well as increasing employment opportunities in creative industries.
 - 6.5. The AEDA Board has expressed an interest in:
 - 6.5.1. Enhancing children and young people's engagement in the cultural life of the city including long-term strategies to increase youth engagement.

- 6.5.2. Growing and better promoting current cultural offerings, including free, accessible, all-ages activities and events across the city.
- 6.5.3. Making North Terrace a nationally significant and sought-after visitor destination based on culture, science, and education.
- 6.5.4. Packaging and promoting cultural offerings across the City and North Adelaide to enhance visibility, engagement, and accessibility.
- 6.5.5. Increasing the range of year-round bookable visitor product to enhance Adelaide's appeal as a place to come.
- 6.5.6. Opportunities to celebrate the 50th anniversary of Rundle Mall in 2026.
- 6.6. Sector and community feedback to AEDA highlights key challenges, including rising costs for events and festivals, fewer rehearsal and performance spaces for musicians, workforce shortages in gaming and post-production VFX, and difficulties in attracting investment for creative projects.

Adelaide Central Market Authority

- 7. Administration sought feedback from the Adelaide Central Market Authority and received the following feedback:
 - 7.1. The City of Adelaide's investment in Market Square reinforces its commitment to cultural life, aligning with the discussion paper.
 - 7.1.1. With Market Square's expansion, live music performances will grow. ACMA also supports introducing an annual Fête de la Musique (Make Music Day) and will continue partnering with cultural organisations to activate the Market and precinct.
 - 7.2. The Cultural Policy will guide Adelaide Central Market (ACMA) programs alongside ACMA's Strategic Plan and other city strategies.
 - 7.3. Food is central to Adelaide's identity, connecting people and driving economic opportunities. The Adelaide Central Market exemplifies this through food events, collaborations with cultural organisations, and support for small businesses.
 - 7.3.1. Educational programs further promote cultural diversity and healthy eating.
 - 7.4. Expanding culinary culture will attract visitors, with ACMA exploring food tourism opportunities as part of the Market's growth.
 - 7.4.1. This aligns with the South Australian Tourism Commission's strategy to promote food and wine as key cultural assets.
 - 7.4.2. The Market already showcases diversity through cooking demonstrations, live music, and cultural festivals such as Chinese New Year, Reconciliation Week, Sauce Day, and Bastille Day.

Reconciliation Committee

- 8. On 5 February 2025, Administration sought feedback through Panpanpalya, and then from the Reconciliation Committee on 5 March 2025. Its members emphasised the need for stronger Aboriginal representation, self-determination, and meaningful partnerships in shaping Adelaide's cultural identity.
 - 8.1. Key themes included the need for Kaurna culture and history to be more visible throughout the City, truth-telling, language preservation, cultural trails, and heritage recognition.
 - 8.2. The feedback also stressed aligning with the Stretch Reconciliation Action Plan 2024-27, strengthening ties with Kaurna Yerta Aboriginal Corporation, and amplifying Aboriginal artists and initiatives.

Kadaltilla / Adelaide Park Lands Authority

- 9. On 27 February 2025, Administration sought feedback from Kadaltilla / Adelaide Park Lands Authority. Its members highlighted the following considerations for the Policy:
 - 9.1. *Local Subcultures & Identity*: Further explore how subcultures contribute to local identity and placemaking. Identify established cultural threads that naturally draw people in. Instead of viewing the Adelaide Park Lands as a single entity, consider highlighting distinct pockets that allow for diverse cultural expressions. The ability to contrast different Adelaide Park Lands settings—and the unique experience of feeling immersed and "lost" in them—adds to their magic.

- 9.2. *Managing Cultural Activation:* Acknowledge that hosting cultural activities in the Adelaide Park Lands may create tensions. Acceptance of associated impacts, such as noise, parking, fencing, and temporary infrastructure, is essential in balancing activation with preservation.
- 9.3. *Strengthening the Role of the Park Lands:* Encourage a stronger emphasis on the Adelaide Park Lands' role in Adelaide's cultural life, ensuring this is clearly articulated and reinforced throughout the policy.
- 9.4. *Expanding the Definition of Culture:* Culture is often associated with vibrancy—noise, movement, colour, and activity. There is also room for silence, respite, and retreat within this Policy. Recognising these quieter, reflective elements could add additional depth.
- 9.5. *Cultural Significance & Storytelling:* While the Adelaide Park Lands are referenced, their deeper cultural and historical significance remains underexplored. Consider integrating a stronger narrative on how they have evolved over time, incorporating Kaurna perspectives, and positioning them within Adelaide's broader cultural identity (e.g. the 'City of Churches').

Policy Principles, Priorities and Roles

10. The Policy reflects Council's leadership role as the governing body for the Capital City of South Australia, its commitments to sustainable development as part of Adelaide's designation as a UNESCO Creative City of Music, and its responsibilities to its ratepayers and residents.
11. The Policy is designed to guide planning, review and delivery of services and programs across the organisation and its subsidiaries enabling cultural vitality to be supported enterprise wide.
12. The Policy sets out five principles that align with Council's Strategic Plan 2024-2028:
 - 12.1. *Amplifying our Creative Capital*
The CoA is committed to supporting cultural jobs and creative careers to attract and retain talent, ensuring a thriving cultural and creative sector and community that drives innovation and economic development.
 - 12.2. *Culturally Inclusive and Socially Connected*
The CoA prioritises cultural diversity and representation, creating opportunities for people of all backgrounds to engage in and contribute to the city's cultural landscape.
 - 12.3. *Reconciliation and Truth Telling*
The CoA is committed to supporting First Nations-led cultural initiatives, ensuring Aboriginal and Torres Strait Islander voices are central to the city's cultural expression and development.
 - 12.4. *Preserving Cultural Heritage, Embracing Progress*
The CoA is dedicated to revitalising and preserving historic culturally significant practices, sites and stories, ensuring cultural heritage preservation aligns with modernisation and city development.
 - 12.5. *Creating Space for Cultural Expression*
The CoA is committed to enhancing vibrancy, liveability, and global recognition through accessible and diverse cultural infrastructure, experiences, and events, while celebrating traditions that foster connection, creativity, and cultural expression.
13. Under each principle in the Policy, key priorities have been defined. The Policy also outlines proposed roles of CoA and its subsidiaries in supporting cultural vitality, reflecting a shared commitment to responsible governance, sustainability, innovation, collaboration and equity.

Evaluation and Governance of the Cultural Policy

14. This framework will allow the CoA to assess its services, programs, partnerships, and infrastructure, identify gaps and opportunities by developing metrics and evaluation tools and strategically allocate resources to support cultural growth and sustainability.

Next Steps

15. If endorsed by the City Community Services and Culture Committee and subsequently Council, the Policy will proceed to final public consultation during April and May 2025 for a 21-day period.
 - 15.1. Public consultation for the Policy will be focused on the Our Adelaide platform, encouraging broad community engagement.
 - 15.2. Council advisory groups, subsidiaries, committees, and consultation participants will be notified and invited to contribute to the draft policy through online platforms, direct engagement, or written submissions.
16. A report will be presented to Council in June 2025 with the final Cultural Policy for endorsement, informed by community feedback, and with a consultation summary.
17. Once adopted, the Policy will serve as a strategic framework for CoA, embedding responsibility across Council operations and decision-making processes for the cultural vitality of our City through to 2036.

DATA AND SUPPORTING INFORMATION

Link 1 – Draft Cultural Policy 2025-2036 Consultation Summary Report

ATTACHMENTS

Attachment A – Draft Cultural Policy 2025-2036

Attachment B – Draft Cultural Policy 2025-2036 High Level Consultation Summary Report

- END OF REPORT -

Cultural Policy 2025- 2036

Date this document was adopted

non-legislative

PURPOSE

The purpose of the City of Adelaide's inaugural Cultural Policy is to promote and support the city's unique cultural identity and opportunities to strengthen Adelaide's role as a global cultural capital through to 2036.

It aligns with the UNESCO Creative Cities mission, recognising that Adelaide is Australia's first and only UNESCO Creative City of Music and part of a global network committed to fully capitalise on their cultural assets and use them as founding pieces for sustainable, inclusive and balanced development across economic, social, cultural and environmental dimensions.

The Cultural Policy informs a unified and collaborative approach across the City of Adelaide and its subsidiaries in valuing, protecting, championing, and promoting the city's unique character, identity, history, creativity, cultural life and communities. It guides strategic investment in infrastructure, funding programs, partnerships, resources, events, initiatives and activities.

CONTEXT

Adelaide / Tarntanya is the Capital City and the civic and cultural heart of South Australia. It is the traditional Country of the Kaurna people of the Adelaide Plains, and we honour and respect their continuous culture, custodianship, and relationship with this land.

It is unique in its design as the world's only city surrounded by Park Lands resulting from the vision of the Surveyor General of South Australia, Colonel William Light, and our community has a proud history of advocating for the protection of our city's distinctive heritage and cultural assets.

Adelaide was founded on ideas of social and political freedom and has been shaped by the diverse cultures and communities it has welcomed over generations. A University city and innovation hub, Adelaide continues to attract global talent, investment and new industries, as one of Australia's most competitive places to do business.

Renowned for its hospitality, with exceptional food and wine, world-class festivals, centres of creative excellence, art and cultural attractions and collections, Adelaide is home to one of the largest undercover fresh produce markets in the Southern Hemisphere, is one of 10 Wine Capitals of the World, is Australia's Festival Capital and the nation's first and only, UNESCO City of Music.

The Cultural Policy aligns with and enables the four pillars of the City of Adelaide Strategic Plan 2024-2028:

- Building a vibrant, connected and inclusive COMMUNITY
- Creating a resilient, protected and sustainable ENVIRONMENT
- Growing and developing an innovative and responsive ECONOMY
- Creating interesting, purposeful and safe PLACES.

PRINCIPLES. PRIORITIES & ROLE

The Cultural Policy sets out core principles that affirm the inherent value and importance of culture, creativity and community to our City's distinctive identity and future prosperity.

For each principle, the priorities and the role of the City of Adelaide are clearly defined, ensuring transparency and accountability. In this way, the Cultural Policy establishes a shared responsibility across the organisation to prioritise culture in future planning, investment, partnerships, and resource allocation.

The principles, priorities and role of the City of Adelaide reflect and are responsive to the vision of the Council and its subsidiaries and Committees, as well as the needs of the community and other key stakeholders.

PRINCIPLE: AMPLIFYING OUR CREATIVE CAPITAL

The City of Adelaide aims to be Australia's cultural and creative capital by nurturing careers and sector growth and supporting talent retention, through partnerships and co-investment. By leveraging its UNESCO Creative City status, Adelaide showcases local talent globally, driving economic growth through its cultural sector.

This principle is reflected in the following priorities that acknowledge that Adelaide is a cultural and creative capital:

- Amplify Adelaide's UNESCO City of Music designation to showcase the city's cultural life, talent, strengths and stories on the global stage.
- Support cultural jobs and creative careers to position culture and creativity as key drivers of economic development, employment, imagination and innovation.
- Celebrate Adelaide's unique cultural identity and enable opportunities for international exchange and collaboration.

Council's role in leading Adelaide as a Cultural and Creative Capital:

Lead: Drive Adelaide's growth as a cultural tourism destination and creative capital through strategic planning and leveraging relationships with universities, businesses, and organisations to invest in creative sector growth.

Enable: Support local creatives at all stages, backgrounds, and abilities, nurturing cultural jobs and professions, community-led enterprises to drive city prosperity.

Promote: Showcase Adelaide's culture, talent, and stories globally through the UNESCO Creative Cities Network.

PRINCIPLE: CULTURALLY INCLUSIVE AND SOCIALLY CONNECTED

Honouring the *Universal Declaration of Human Rights*, the City of Adelaide is committed to ensuring that everyone has the right to participate in, enjoy, and contribute to the city's cultural life. We prioritise equitable and affordable access for communities of all abilities and backgrounds and celebrate diverse cultural expressions. Culture fosters social connection, wellbeing, and a sense of belonging, enriching the everyday life of our city.

This principle is reflected in the following priorities, recognising that people are at the heart of our city and its culture.

- Enable all people to contribute to and participate in the cultural life of the city.
- Ensure that access to Adelaide's culture is easy and affordable for everyone, with a focus on:
 - young people
 - older people

- people living with disabilities
- culturally and linguistically diverse communities
- women; and
- LGBTQIA+ communities.
- Promote a cultural life in Adelaide that showcases the strength of our sector and the diversity of our communities.

Council's role in recognising that people are at the heart of our city and its culture:

Lead: Integrate accessibility, inclusivity, and equity into cultural planning.

Enable: Develop, facilitate, and support affordable, accessible and community-led cultural experiences for City of Adelaide venues, public spaces, neighbourhoods, precincts, and throughout the Adelaide Park Lands.

Partner: Leverage Adelaide's status as a creative capital to advocate for public transport improvements that enhance access to culture and support sector workers.

PRINCIPLE: RECONCILIATION AND TRUTH TELLING

The City of Adelaide acknowledges the Kaurna people as the traditional custodians of the Adelaide Plains and fully supports Aboriginal and Torres Strait Islander self-determination. We recognise the importance of addressing past injustices, centering First Nations perspectives, and promoting cultural revitalisation through language, storytelling, and creative expression.

This principle is reflected in the following priorities that honour the continuous cultures of Aboriginal and Torres Strait Islander Peoples.

- Honour and strengthen awareness of Kaurna culture and connection to Country.
- Celebrate Aboriginal and Torres Strait Islander peoples and culture in city design, public art, festivals, events, and public spaces.
- Support Aboriginal and Torres Strait Islander-led cultural initiatives, including cultural revitalisation through language, storytelling, cultural burns, and other cultural and creative practices.

Council's role in honouring the continuous cultures of Aboriginal and Torres Strait Islander Peoples:

Lead: Embed Reconciliation and Aboriginal and Torres Strait Islander peoples' perspectives in policies, city planning and design and cultural programs.

Protect: Respect Aboriginal and Torres Strait Islander rights, self-determination, and cultural heritage by showcasing, celebrating and amplifying culture and connection to Country.

Enable: Support, facilitate, and collaborate on Kaurna and Aboriginal and Torres Strait Islander cultural initiatives, including public art, festivals, events, language revitalisation, storytelling, and cultural practices.

PRINCIPLE: PRESERVING CULTURAL HERITAGE, EMBRACING PROGRESS

The City of Adelaide is committed to preserving its cultural and natural heritage and embracing revitalisation and progress. We celebrate and strengthen our world-class architecture, cultural assets, collections, and Park Lands, ensuring Adelaide's distinctive identity and history are preserved for future generations. The city also supports diverse cultural traditions, including national commemorations, festive events, and social practices that reflect and unite the community.

This principle is reflected in the following priorities acknowledging the connection between the city's culture and its built and natural heritage while balancing modernisation with preservation:

- Protect and revitalise the city's cultural heritage including world-class architecture, iconic cultural venues, and collections, and preserving the Adelaide Park Lands, open spaces and natural environment.
- Ensure people, culture and creativity are at the centre of planning, design and development decisions in the city.
- Celebrate our local character, food, culture, customs, social practices and traditions, places and spaces.

Council's role in preserving cultural heritage and embracing progress:

Lead: Identify gaps and opportunities to strengthen policies and plans, and streamline processes to prioritise people, culture, creativity and heritage preservation.

Partner: Advocate for the value of Adelaide's heritage locally and internationally to influence policies and attract investment among the levers to safeguard Adelaide's built heritage, cultural venues, natural environments, and community traditions.

Enable: Support and promote projects that revitalise heritage, encourage adaptive reuse, and celebrate cultural expressions, initiatives and communities.

Promote: Highlight Adelaide's architecture, natural sites, traditions, social and cultural practices through events, storytelling and public art.

PRINCIPLE: CREATING SPACE FOR CULTURAL EXPRESSION

Council is committed to enhancing the city's vibrancy, liveability, and global profile through accessible, high-quality, and diverse cultural infrastructure, experiences and activations, designed to foster connection, creativity, and cultural expression.

This principle is reflected in the following priorities that foster and celebrate a creative and culturally connected vibrant city and community.

- Embed creativity and culture into the everyday life of the city.
- Expand the city's cultural infrastructure, including activating under-utilised spaces, to enhance Adelaide's appeal, foster community and create a sense of belonging.
- Ensure that creativity, along with Adelaide's unique arts, cultural experiences, and stories, is easily accessible, fuelling the city's vitality, day and night, and all year-round.

Council's role in fostering and celebrating a creative and culturally connected vibrant city and community:

Lead: Integrate creativity and culture into all aspects of city life through strategic planning, infrastructure and initiatives.

Enable: Facilitate, support, and deliver diverse and safe cultural experiences year-round in partnership with government, the private and cultural sectors and community, balancing small and large-scale cultural and community events across a diversity of spaces and the Park Lands.

Promote: Celebrate and elevate Adelaide's cultural life to enhance access to cultural experiences and opportunities and attract new audiences and investment.

APPLICATION

The City of Adelaide is part of a dynamic cultural ecosystem, a hyper-networked and innovative society that thrives through cross-sector collaboration.

To deliver on the vision for Adelaide's cultural life through to 2036, it will be vital to:

- Leverage networks, forums, relationships at the national, state and local levels.
- Partner with government, non-government organisations, the private sector, and the community; and
- Access expertise, attract resources, and sustain the city's cultural and economic growth.

The Cultural Policy 2025-2036 guides the City of Adelaide in establishing culture as a central pillar of urban and environmental planning, city growth, economic development, social cohesion, and community life to enhance Adelaide's reputation as a global cultural capital and contribute to a creative, connected, safe, resilient, inclusive, and sustainable city.

The principles and priorities of the Cultural Policy 2025-2036 will be reflected in and enabled by strategies, operations, budgets and work plans across the organisation, including subsidiaries of Council. This cohesive and considered approach represents an efficient, effective and economical use of public resources through annual business plans and budget processes.

EVALUATION

The City of Adelaide will implement appropriate governance and evaluation processes to ensure the Cultural Policy 2025-2036 delivers on its purpose, ensures effective resource allocation, drives meaningful and measurable progress, and the impact of Council's investment and decisions on the culture of the community are understood and valued. National best practices will be used in collaboration with capital city councils, the Australian Local Government Association, and State and Federal Governments.

The City of Adelaide will:

- Communicate achievements, challenges, and future priorities.
- Conduct a review every five years to ensure relevance, responsiveness to external factors, and alignment with current and future needs of the community.

OTHER USEFUL DOCUMENTS

Related documents

- City of Adelaide Strategic Plan 2024-2028
- City of Adelaide City Plan 2036
- City of Adelaide Stretch Reconciliation Action Plan 2024 – 2027
- City of Adelaide Disability, Access and Inclusion Plan 2024-2028
- City of Adelaide Economic Development Strategy 2024-2028
- City of Adelaide Heritage Our Future: Heritage Strategy & Action Plan 2021-2036
- City of Adelaide Safer City Policy 2019-2023
- City of Adelaide Integrated Climate Strategy 2030
- Adelaide Central Market Authority Charter and Strategic Plan 2023-28
- Adelaide Economic Development Agency Charter and Strategic Plan 2024-2028
- Kadaltilla / Adelaide Park Lands Authority Charter and Adelaide Park Lands Strategy 2025- 2035

Relevant legislation

- *Local Government Act 1999 (SA)*

- *Copyright Act 1968*
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*
- *Aboriginal Heritage Act 1988 (SA)*
- *Environment Protection and Biodiversity Conservation Act 1999*
- *Adelaide Park Lands Act 2005 (SA)*
- *South Australian Multicultural Act 2021 (SA)*
- *Heritage Places Act 1993 (SA)*
- *Planning, Development and Infrastructure Act 2016 (SA)*

Other Policies, Strategies, Guidelines and Documents informing this Policy:

- UNESCO Creative Cities Network (UCCN) Charter, 2004
- The United Nations Universal Declaration on Cultural Diversity 2001
- The United Nations Declaration on the Rights of Indigenous Peoples 2009
- National Cultural Policy, Revive: a place for every story, a story for every place, 2023
- Government of South Australia's Cultural Policy 2025
- Aboriginal and Torres Strait Islander Arts Strategy for South Australia 2019 (SA)
- National Association for the Visual Arts: Code of Practice 2024
- Creative Australia: Using First Nations Protocols for Cultural and Intellectual Property in the Arts 2023
- Australian Local Government Association: Arts & Culture Policy Position 2022

GLOSSARY

Throughout this document, the below terms have been used and are defined as:

Culture

Culture is a fundamental human right that enriches lives, fosters creativity, and shapes identity. It reflects our way of life, values, traditions, and beliefs, expressed through art, architecture, festivals, food, language, literature, and music. The City of Adelaide's Cultural Policy defines culture as including the arts, creative industries, and heritage sectors, Aboriginal and Torres Strait Islander cultural practices, diverse identities shaped by migration and history, and cultural expressions reflecting contemporary Adelaide.

Creative

A creative is an individual or group engaged in artistic expression, innovation, and cultural production, generating cultural, social, and economic value. In the City of Adelaide's Cultural Policy, creatives include artists, performers, musicians, designers, architects, digital media professionals, writers, filmmakers, storytellers, cultural practitioners, and heritage workers. They shape identity, foster connections, and drive economic growth, making them essential to Adelaide's thriving cultural landscape.

Cultural Infrastructure

Cultural infrastructure includes physical, digital, and social spaces that support art, culture, and community engagement. It covers galleries, museums, theatres, creative hubs, public spaces, and heritage sites, as well as digital platforms that expand cultural access. This valuable resource strengthens Adelaide's cultural, social, and economic vitality, reinforcing its identity as a vibrant and creative city.

Heritage

Refers to the legacy of tangible and intangible assets inherited from past generations, maintained in the present, and passed on to future generations. It encompasses both cultural and natural elements that hold historical, social or environmental significance.

Self-Determination

Self-determination is an ongoing process of ensuring that peoples are able to make decisions about matters that affect their lives. Essential to the exercise of self-determination is choice, participation and control.

Truth-Telling

Truth-telling enables a fuller and more accurate account of Australia's history to recognise the strength and contribution of Aboriginal peoples and Torres Strait Islander peoples. It acknowledges the historical silencing of injustices and ongoing impacts of colonisation on First Nations peoples. Truth-telling is fundamental to advancing Reconciliation.

ADMINISTRATIVE

As part of Council's commitment to deliver the City of Adelaide Strategic Plan, services to the community and the provision of transparent information, all policy documents are reviewed as per legislative requirements or when there is no such provision a risk assessment approach is taken to guide the review timeframe.

This Policy document will be reviewed every 5 years unless legislative or operational change occurs beforehand. The next review is required in 2030.

Review history:

Trim Reference	Authorising Body	Date/ Decision ID	Description of Edits
<i>ACC2018/9000 (example)</i>	<i>Associate Director People & Governance</i>	<i>19/12/2018</i>	<i>Minor amendments made to illustrate a change in operational process</i>
	Council		Inaugural Policy endorsed by Council

Contact:

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CULTURE: THE LIFE OF OUR CITY

STAGE 1 COMMUNITY ENGAGEMENT SUMMARY

1. BACKGROUND

A key action in the City of Adelaide Strategic Plan 2024-2028 is to “Develop a Cultural Policy by 2024 that promotes and supports the City’s unique cultural identity and opportunities”. Between 4 November 2024 and 5 March 2025 the City of Adelaide engaged with community to inform the development of City of Adelaide’s Cultural Policy 2025-2036 to position culture, creativity and community at the heart of Adelaide’s planning for sustainable urban development over the next decade.

The engagement process confirmed that our community shares a clear and strong view about the centrality of culture to build a safe, resilient and sustainable city for future generations. The community stressed the City of Adelaide’s central role in valuing, protecting and promoting the city’s distinctive character and cultural life.

This document is a summary of the *Culture: The Life of Our City. Stage 1 Community Engagement Report*. It presents a summary of the consultation findings and how they have informed the draft Cultural Policy 2025-2036.

2. HOW WE ENGAGED AND WHO WE HEARD FROM

A total of **1,117** community members provided direct feedback during the consultation process, one of the most extensive cultural engagement efforts undertaken by the City of Adelaide. To ensure broad community representation, the consultation adopted a multi-method approach as outlined in **Table 1**.

Table 1. Community Engagement Activities and Consultation Participants

Engagement Activity	Participation	Consultation Participants
Two targeted Stakeholder Forums hosted by the Lord Mayor Dr Jane Lomax-Smith AM	In person 200 attendees	Community, cultural and business leaders, universities and high schools, major cultural institutions, festivals, live music venues, creative practitioners and performers, policy developers and planners, peak bodies, precinct, residents and other advocacy groups.
Eight Community Pop-Up Sessions	In person 226 participants	All audiences who participate in the cultural life of the city: residents, workers, visitors, students. A targeted youth session delivered for young people aged 13 to 17.
Advisory Groups and Subsidiaries	In person 5 engagements	City of Adelaide Advisory Groups and Subsidiaries: Access and Inclusion Advisory Panel, Reconciliation Committee, Kadaltilla/Adelaide Park Lands Authority, Adelaide Economic Development Agency, and the Adelaide Central Market Authority.
Eleven Submissions	Written + In Person 11 submissions	9 emails submissions and 2 community meetings documented
51-day Our Adelaide online community survey	Written 675 responses	When asked to define their participation in city life, survey respondents had the opportunity to choose more than one option, reflecting that some individuals can have multiple key relationships with the City. • 29% CoA resident (49% 10+ years residents) • 41% City worker

		• 52% Visitors • 7% CoA based cultural organisations • 7% CoA based businesses • 6.5% Student in the city • 3.4% Art studio/creative space in CoA 32% of survey respondents identified as part of the following demographic groups: • LGBTIQ+ (112 responses) • People with a disability (81 responses) • Culturally diverse communities (68 responses) • Aboriginal and Torres Strait Islander (15 Responses). The age distribution of survey respondents was: • 6.5% young people under 25 • 27% people 25-39 • 35% 40-54 • 28% 55 to 74 • 3.6% 75 years+.
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3. COMMUNITY CONSULTATION FINDINGS

Overall, the public consultation confirmed that culture is a crucial part of the city's life and future. Cultural experiences as being fundamental to attracting people to live in, visit and invest in our city, reflecting and expressing our identity shaped by our community, heritage, history, and values.

The community identified the following existing cultural strengths that define Adelaide's unique character and liveability including:

- Cultural experiences for everyone.
- Festivals and celebrations.
- Outdoor experiences.
- Nightlife and live music venues.
- Built heritage and memorials.
- Diversity of traditions and expressions.
- Public art, sculptures, and murals.
- Community connections and belonging.
- Nature connected experiences.
- Pedestrian friendly and city layout.
- Central Market and food culture.
- First Nations culture visibility in the life of the city.
- Street level culture (food trucks, resident and neighbourhood activities, precinct events)

Community-identified priorities for shaping Adelaide's cultural future:

The community expressed strong expectations that the City of Adelaide will continue to play a leadership role in fostering cultural development, seeing Council as critical in ensuring a vibrant, inclusive, sustainable city. Consultation feedback emphasised the centrality of culture in shaping the city's future, with a clear call for Council to value, protect, and promote the city's distinctive character and cultural life.

To achieve the community's vision for the cultural life of the city over the next decade the community

identified, through the community survey, the following initiatives for the City of Adelaide to prioritise over the next decade:

- Accessible, inclusive, and affordable experiences for all, including transportation improvements.
- Creating spaces for cultural expression and experiences year-round, day and night.
- Amplify our creative capital through creative industries growth, partnerships, and funding to retain young and creative talent.
- Protection of natural heritage, environmental sustainability, and climate action.
- Public safety and wellbeing.
- Cultural and built heritage protection and revitalisation balancing modernisation.
- Reconciliation and First Nations cultural leadership.
- Effective governance and Council's leadership.

Table 2 presents the community vision for Adelaide's Cultural Life and how it informed the draft Cultural Policy 2025-2036.

Table 2. Community Vision for Adelaide's Cultural Life and Cultural Policy Application

Vision	Cultural Policy Principle: Amplifying our Creative Capital
• Partnerships and co-investment maximise opportunities for the growth of Adelaide's creative industries. • Investment in local creatives, enterprises, and the local creative industries. • Adelaide's UNESCO City of Music designation better utilised. • International collaborations and exchanges are balanced with support to local creatives and stories. • Education is affordable and there are enough career opportunities to retain young people and cultural enterprises in Adelaide.	• Amplify Adelaide's UNESCO City of Music designation to showcase the city's cultural life, talent, and stories on the global stage. • Support cultural jobs and creative careers to position culture and creativity as key drivers of economic development, employment, and innovation. • Balance Adelaide's unique cultural identity with opportunities for international exchange and collaboration.
Vision	Cultural Policy Principle: Culturally Inclusive and Socially Connected
• Access to culture should be equitable for all. • Barriers to cultural participation including affordability, cost and model of current transport services, city safety and accessibility are reduced or removed. • Adelaide's walkability and transportation connectivity should be prioritised to strengthen cultural access. • A safe city that supports people to thrive	• Enable all people to contribute and participate in the life of the city. • Ensure that access to Adelaide's culture is easy and affordable for everyone with a focus on marginalised and vulnerable populations including young people, older people, people living with disabilities, culturally and linguistically diverse communities, women and LGBTIQ+ communities • Promote a cultural life and creative workforce in Adelaide that reflects the diversity of its communities.

Vision	Cultural Policy Principle: Reconciliation and Truth Telling
• Collaboration with Kurna and First Nations to increase visibility in city design, events, and public spaces. • Truth telling and cultural preservation including intergenerational knowledge sharing, cultural burning, language revival. • Events where local communities connect with Kurna and First Nations peoples. • Kurna and First Nations representation in cultural leadership and decision-making.	• Honour and strengthen awareness of Kurna culture and connection to Country. • Celebrate Kurna and First Nations culture and connection to Country • Support Kurna and First Nations-led cultural initiatives including cultural revitalisation through language, storytelling, cultural burns and other cultural and creative practices.
Vision	Cultural Policy Principle: Preserving Cultural Heritage, Embracing Progress
• Preserving and revitalising Adelaide's built heritage, including historical and world class architecture, sandstone buildings, cultural assets, collections, and live music venues. • Preserving the Adelaide Park Lands, the city's green spaces and natural heritage as central to the life of the city. • Balance modernisation with heritage conservation and the preservation of Adelaide's unique identity. • Storytelling and interpretation of Adelaide's unique history.	• Protect and revitalise the city's cultural heritage, including world-class architecture, iconic cultural venues, and collections, and the Adelaide Park Lands, open spaces and natural environment. • Ensure people, culture and creativity are at the centre of urban and environmental planning, design and development decisions in the city. • Celebrate our local character, food, culture, customs, social practices and traditions, places and spaces. Celebrate our local character, food, culture, customs, social practices and traditions, places and spaces.
Vision	Cultural Policy Principle: Creating Space for Cultural Expression
• Support a year-round cultural events calendar beyond seasonal spikes. • Balance funding major events/festivals and funding smaller grassroots events and creatives. • Dedicated and accessible cultural spaces. • Adequate music and cultural infrastructure • Planning considers cultural infrastructure requirements. • Adelaide's diversity of cultural offerings and venues is visible and promoted.	• Embed creativity and culture into the everyday life of the city. • Invest in and expand the city's cultural infrastructure, including activating under-utilised spaces, to enhance Adelaide's appeal, foster community and create a sense of belonging. • Ensure that creativity, along with Adelaide's unique arts, cultural experiences, and stories, is easily accessible, fueling the city's vitality day and night, and all year-round.

4. COMMUNITY IDENTIFIED OBSTACLES TO ACHIEVING THEIR VISION FOR ADELAIDE'S CULTURAL FUTURE

The obstacles that community raised in the consultation highlighted clear areas of priority for Council's Cultural Policy. Addressing these concerns will be critical to ensuring that Adelaide's cultural life is inclusive, economically viable and resilient, with a unique identity that is locally loved and internationally renowned, supporting the city's projected growth over the next decade.

Community- Identified Obstacles	Impact
Limited funding for arts and culture	Constraining cultural sector growth, city vibrancy and community participation.
Affordability and cost of living	Impacting communities' ability to visit and participate in the cultural life of the city.
Lack of visibility and support for local creatives	Challenge to attract and retain talent.
Public transport cost, frequency, availability and accessibility	Impacting communities' ability to visit and participate in the cultural life of the city.
Policy and planning	Decision making, services and programs that don't adequately meet community need.
Overdevelopment	Loss of cultural and natural spaces and our unique character due to redevelopment.
Accessibility barriers	Challenges for vulnerable populations in accessing cultural events and venues and moving around the city.
Perception of city safety	Impacting community willingness to visit and participate in the cultural life of the city.
Climate Change	Barrier for the community to visit and participate in the cultural life of the city in days of extreme weather events.

Tuesday, 1 April 2025

City Community Services
and Culture Committee

Program Contact:

Anthony Spartalis, Chief
Operating Officer

Approving Officer:

Michael Sedgman, Chief
Executive Officer

Public

EXECUTIVE SUMMARY

Section 90(2) of the *Local Government Act 1999 (SA)* (the Act), states that a Council may order that the public be excluded from attendance at a meeting if the Council considers it to be necessary and appropriate to act in a meeting closed to the public to receive, discuss or consider in confidence any information or matter listed in section 90(3) of the Act.

It is the recommendation of the Chief Executive Officer that the public be excluded from this City Community Services and Culture Committee meeting for the consideration of information and matters contained in the Agenda.

For the following Chief Executive Officer's Report seeking consideration in confidence

10.1 Arts and Culture Music Festival 2025, Bartels Road Closure [section 90(3) (d) of the Act]

The Order to Exclude for Item 10.1:

1. Identifies the information and matters (grounds) from section 90(3) of the Act utilised to request consideration in confidence.
2. Identifies the basis – how the information falls within the grounds identified and why it is necessary and appropriate to act in a meeting closed to the public.
3. In addition, identifies for the following grounds – section 90(3) (b), (d) or (j) of the Act - how information open to the public would be contrary to the public interest.

ORDER TO EXCLUDE FOR ITEM 10.1

THAT THE CITY COMMUNITY SERVICES AND CULTURE COMMITTEE:

1. Having taken into account the relevant consideration contained in section 90(3) (d) and section 90(2) & (7) of the *Local Government Act 1999 (SA)*, this meeting of the City Community Services and Culture Committee dated 1 April 2025 resolves that it is necessary and appropriate to act in a meeting closed to the public as the consideration of Item 10.1 [Arts and Culture Music Festival 2025, Bartels Road Closure] 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 is confidential as the item contains certain information of a confidential nature.

The disclosure of information may adversely impact on the commercial position of the Proponent.

Public Interest

The Council 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 City of Adelaide and the Proponent. The Council notes that the Proponent has future announcements linked to this report that it does not wish to be made public at this time

2. Pursuant to section 90(2) of the *Local Government Act 1999 (SA)* (the Act), this meeting of the City Community Services and Culture Committee dated 1 April 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 [Arts and Culture Music Festival 2025, Bartels Road Closure] 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) (d) of the Act.

DISCUSSION

1. Section 90(1) of the *Local Government Act 1999 (SA)* (the Act) directs that a meeting of Council must be conducted in a place open to the public.
2. Section 90(2) of the Act, states that a Council may order that the public be excluded from attendance at a meeting if Council considers it to be necessary and appropriate to act in a meeting closed to the public to receive, discuss or consider in confidence any information or matter listed in section 90(3) of the Act.
3. Section 90(3) of the Act prescribes the information and matters that a Council may order that the public be excluded from.
4. Section 90(4) of the Act, advises that in considering whether an order should be made to exclude the public under section 90(2) of the Act, it is irrelevant that discussion of a matter in public may -
 - (a) *cause embarrassment to the council or council committee concerned, or to members or employees of the council; or*
 - (b) *cause a loss of confidence in the council or council committee; or*
 - (c) *involve discussion of a matter that is controversial within the council area; or*
 - (d) *make the council susceptible to adverse criticism.*
5. Section 90(7) of the Act requires that an order to exclude the public:
 - 5.1 Identify the information and matters (grounds) from section 90(3) of the Act utilised to request consideration in confidence.
 - 5.2 Identify the basis – how the information falls within the grounds identified and why it is necessary and appropriate to act in a meeting closed to the public.
 - 5.3 In addition identify for the following grounds – section 90(3) (b), (d) or (j) of the Act - how information open to the public would be contrary to the public interest.
6. Section 83(5) of the Act has been utilised to identify in the Agenda and on the Report for the meeting, that the following reports are submitted seeking consideration in confidence.
 - 6.1 Information contained in Item 10.1 – Arts and Culture Music Festival 2025, Bartels Road Closure
 - 6.1.1 Is not subject to an existing Confidentiality Order.
 - 6.1.2 The grounds utilised to request consideration in confidence is section 90(3) (d) of the Act
 - (d) commercial information of a confidential nature (not being a trade secret) the disclosure of which—
 - (i) could reasonably be expected to prejudice the commercial position of the person who supplied the information, or to confer a commercial advantage on a third party; and
 - (ii) would, on balance, be contrary to the public interest

ATTACHMENTS

Nil

- END OF REPORT -

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