City of Adelaide

Draft Adelaide Park Lands Leasing and Licensing Policy

Consultation Summary

August 2026

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Purpose

This document is a summary of feedback received during public consultation on the draft Adelaide Park Lands Leasing and Licensing Policy ('draft Policy') between 12 June and 2 July 2026.

Outreach and Engagement

Consultation Period – 12 June to 2 July 2026

1,568 OURADELAIDE VISITS	**152** DRAFT POLICY DOWNLOADS	**32** TOTAL SUBMISSIONS	**23 (72%)** CURRENT LESSEE OR LICENSEE SUBMISSIONS

Outreach included the OurAdelaide project page and online form, email and written submission channels, opportunities to request a staff meeting, and two advertised drop-in sessions on 23 and 25 June. Two direct email campaigns were sent to current lessee and sublessee contacts during the consultation.

The 32 submissions comprised 27 OurAdelaide forms and five email or written submissions. 16 were received from community organisations, eight from educational institutions, seven from the broader community and one from a commercial entity.

This provided feedback from organisations directly affected by the draft Policy, as well as broader community perspectives.

How the findings are presented

Each completed feedback form and written submission was counted separately. Where more than one submission was received from an organisation, each was counted as a separate submission.

Each consultation question is reported separately so its result can be read alongside the comments received. Percentages for the structured questions use the online responses to that question. Written submissions are summarised under the relevant topic and do not change those percentages.

OurAdelaide visits and downloads are activity counts and may include repeat users.

Consultation context

The submission form asked respondents to rate three specific areas of the draft Policy. The results should be read as responses to the area tested in each question, rather than as an overall measure of support for the draft Policy.

Some respondents selected Agree while requesting changes to how a policy provision would operate. Others selected Neutral or Disagree while supporting part of the proposed policy approach.

Structured results

Consultation question	1 Strongly disagree	2 Disagree	3 Neutral	4 Agree	5 Strongly agree
Responsibilities and maintenance: responsibilities are clear (n=26)	7.7%	11.5%	3.8%	69.2%	7.7%
Fees and financial capacity: greater capacity should attract higher fees (n=27)	11.1%	11.1%	25.9%	33.3%	18.5%
Expression of Interest exemptions: listed circumstances are appropriate (n=27)	11.1%	14.8%	29.6%	25.9%	18.5%

Question wording is shortened for display. Percentages are rounded to one decimal and may not total 100%. One online respondent did not answer the question about responsibilities.

What We Heard

Community benefit and fee rebate eligibility

Question focus. *Respondents were asked which community benefit actions should support fee rebate eligibility and whether other actions should be included.*

Feedback identified the following priority areas of community benefit:

- **Shared use and access.** Making facilities available to schools, clubs and community groups where practical.
- **Participation and wellbeing.** Sport, recreation, social connection, youth development and community activity.
- **Inclusive and affordable participation.** Opportunities for diverse groups and people facing barriers to participation.
- **Public access and Park Lands protection.** Continued public use and limits on unnecessary exclusion.
- **Environmental and asset stewardship.** Sustainable practices, facility care and improvements to the Park Lands.

Respondents also asked that volunteer effort, facility maintenance, capital investment, partnerships and emergency support be recognised. Written submissions reinforced the principles of stewardship, access and community benefit.

Responsibilities and maintenance

Question focus. *Respondents were asked whether the responsibilities of Council, lessees and licensees were clearly outlined.*

77% of respondents agreed or strongly agreed that the responsibilities were clear.

The result indicates that the allocation of responsibilities was generally understood, but not that every proposed responsibility was supported; some respondents who selected "Agree" still raised concerns about specific obligations.

Comments focused on proportionality across agreement and facility types, including differences in exclusivity, control, facility condition and ownership, organisational capacity and existing investment.

Some respondents requested a clearer distinction between day-to-day maintenance, structural work, asset renewal and compliance-related upgrades. Respondents also asked how mandatory inspection costs and existing investment would be treated.

On waste, respondents asked about access to green organics and recycling services and whether the level of waste collection should reflect the scale of each facility. Other matters included graffiti removal, renewable electricity requirements, maintenance records, emergency access, event disruption and the allocation of costs.

Maintenance Responsibilities. Feedback emphasised clear maintenance schedules and definitions so the responsibilities set by the Policy and each agreement can be understood and applied consistently.

Fees and financial capacity

Question focus. *Respondents were asked whether organisations with greater financial capacity should pay higher lease or licence fees.*

52% of respondents agreed or strongly agreed, 26% were neutral and 22% disagreed or strongly disagreed.

The result showed greater support than opposition to differentiated fees. Comments focused on how financial capacity would be measured and applied, with respondents seeking a clear and transparent approach.

Participants who supported differentiated fees generally viewed them as a means of protecting access for smaller community organisations.

Across the ratings, the main issue was how financial capacity would be measured. Respondents noted that higher annual revenue can accompany higher participation and program delivery, as well as greater utility, maintenance and reinvestment costs, rather than indicating available surplus.

Respondents asked that an assessment consider the financial position of the entity holding the agreement, operating and utility costs, community benefit, existing investment, the value and exclusivity of the rights granted and the ability to generate commercial income. They also cautioned against penalising organisations where greater participation or shared use increases operating costs.

Written submissions sought transparent fee rates and practical examples, including how categories translate into charges, how existing agreements and rebates would be treated and how historic and continuing investment would be recognised

Financial Capacity. Feedback emphasised equitable fees and transparent application, with respondents seeking consideration of revenue alongside operating costs, community benefit and existing investment.

Exemptions from an Expression of Interest

Question focus. *Respondents were asked whether the listed circumstances for an exemption from an Expression of Interest were appropriate.*

44% of respondents agreed or strongly agreed, 30% were neutral and 26% disagreed or strongly disagreed.

Feedback indicated that respondents interpreted the question in two ways: direct negotiation with an established occupant and selection of a different occupant without an open process. This distinction helped explain why some respondents selected Neutral or Disagree while still supporting direct negotiation in defined circumstances. Concerns related mainly to transparency, certainty and the opportunity for an existing occupant to be heard.

Respondents expected any exemption to have clear criteria and formal oversight. Direct negotiation was considered appropriate where an Expression of Interest would add limited value, particularly for an established organisation with demonstrated compliance, community benefit and investment. Respondents also sought a fair process for reallocating an area.

Respondents also raised concerns about the time taken to complete the Expression of Interest process relative to the agreement terms, tenure uncertainty that can discourage investment, and reliance on specialised facilities with few alternatives. Several sought a clearer explanation of how Council would treat existing lessees and licensees compared with 'new' ones, and of holding-over arrangements.

EOI Exemptions. Feedback emphasised clear criteria and formal Council oversight, with direct negotiation recognised as appropriate in defined circumstances.

Increasing community use

Question focus. *Respondents were asked what lessees and licensees could do to increase community use and what barriers may prevent this.*

Actions identified

- **Shared access and casual hire.** Make facilities available for use outside core hours when capacity allows.
- **Clear information.** Publish availability, booking contacts and conditions through simple channels.
- **Programs and partnerships.** Offer open days and introductory activities and work with schools and community groups.
- **Council coordination.** Help connect organisations, users and nearby facilities where shared arrangements are practical.

Barriers identified

- **Facility limits.** Some sites are at capacity, purpose-built or require time for playing-surface recovery.
- **Operating costs.** Additional use can increase cleaning, utilities, maintenance, security and compliance costs.
- **Organisational capacity.** Volunteer groups may have limited time to promote facilities, manage bookings and supervise users.
- **Operational and access needs.** Safety, child protection, seasonal use, parking, events and tenure can restrict availability.

Community Access. Feedback identified opportunities for broader community use where facility capacity and operating requirements allow.

Policy clarity and additional detail

Question focus. *Respondents were asked where further explanation or detail would be helpful.*

Some respondents considered the existing level of detail sufficient, while others requested further detail in the following areas:

- **Lessee renewal and selection.** Existing agreements, holding over, past performance, investment and the Expression of Interest process.
- **Responsibilities.** Maintenance boundaries, structural elements, Council support and long-term asset planning.
- **Permitted use.** School sport, club functions, fundraising, casual hire and related revenue-generating activity.
- **Fees and access.** Fee calculations, rebates, subletting, cost recovery and expectations for community use.

- **Administration.** Reporting, events, access, parking, plain language and measurable criteria.

Written submissions reinforced the need for consistent terms and clear treatment of permitted use, tenure, fees, structural responsibilities and subletting.

Other feedback

Question focus. *Respondents were invited to provide any other feedback on the draft Policy.*

Additional feedback reinforced matters raised through the earlier questions and placed particular emphasis on tenure and the practical operation of the Policy.

- **Tenure and investment.** Greater tenure certainty where organisations have made, or plan to make, significant investment.
- **Proportionate administration.** Reporting and obligations that recognise volunteer capacity and the rights provided by each agreement.
- **Permitted use and income.** Clear treatment of legitimate fundraising, approved hire and cost recovery.
- **Park Lands outcomes.** Continued public access, community benefit, amenity and protection of the Park Lands.

A compilation of verbatim consultation responses is provided separately (ACC2026/97747).

Conclusion

Public consultation on the draft Policy resulted in 32 submissions. It identified areas of broad agreement and matters where respondents sought further detail on the practical application of the Policy. Most respondents to the structured question considered responsibilities clear, while comments across the responsibilities, fee categories and EOI exemption questions emphasised the need for clarity, transparency and practical implementation.

Views differed on how financial capacity should be assessed and when direct negotiation may be appropriate. These differences reflected varied operating models, agreement types, facilities, levels of control and existing investment across the Park Lands.

Appendix A – Respondents by category

Community organisations	Educational institutions	Commercial entities	Broader community
Torrens Rowing Club Inc	Wilderness School Ltd	Earth Adventure	The North Adelaide Society
SAUCNA	Department for Education		Individual
Adelaide Community Sports and Recreation Association	Prince Alfred College		Individual
Adelaide Comets FC (2x)	Blackfriars Priory School		Individual
Touch Football South Australia	Pulteney Grammar School		Individual
Club De Petanque D'Adelaide	Pembroke School		Individual
Adelaide Harriers Athletic Club	Adelaide University		Individual
Adelaide Bowling Club Inc	Sports Association for Adelaide Schools		
South Park Lands Hockey and Tennis Centre Inc			
Football SA			
West Adelaide Soccer Club			
South Terrace Croquet Club			
Adelaide Archery Club			
Croquet SA			
Old Ignatians Football Club			

▭ = Current lessee/licensee/sublessee