

# **ADELAIDE PARK LANDS DRY AREA REGULATION**

## **CONSULTATION SUMMARY**

VERSION - 24 OCTOBER 2023

## Background

The Adelaide Park Lands provide opportunities for recreation, socialisation and reflection and the City of Adelaide aims to ensure these public spaces are safe and accessible for all community members.

Public spaces are a valuable asset for groups of people to gather and socialise and alcohol consumption is a feature of this. This can become problematic when alcohol consumption is excessive and is coupled with related anti-social behaviour. This may be even more complex when presenting in vulnerable populations such as those who are homeless or Aboriginal people visiting Adelaide from other communities, who have no other place to stay.

The Adelaide Park Lands - Area 1 Regulation was implemented in 2014 as a strategy for addressing alcohol related anti-social behaviour. This Dry Area is timed from 8:00pm to 11:00am.

In 2021, Adelaide Park Lands – Area 2 covering Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21) became a Dry Area 24 hours a day, 7 days a week.

A Dry Area makes it illegal to consume alcohol or carry an open liquor container in a designated public space during the regulated times.

The Adelaide Park Lands – Area 1 and Area 2 Regulation expires on 22 December 2023.

To inform Council's decision about the future of the Adelaide Park Land Dry Area Regulation, City of Adelaide consulted with stakeholders and the community to seek feedback on:

- Whether the Adelaide Park Lands Dry Area Regulations should be extended or removed?
- If the Regulations continue, should there be any changes to the Adelaide Park Lands – Area 2 covering Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21) which is 24 hours a day, 7 days a week?
- If the Regulations continue, should the extension be for two years (as has previously been the case) or a different timeframe?

## Public Consultation and Responses

Consultation ran from 22 September 2023 to 20 October 2023 with extensions provided to several agencies at their request.

Stakeholders from 113 different organisations including a range of State Government agencies, adjacent local government areas, Adelaide Park Lands lease or licence holders, community services providers and community organisations were emailed a letter asking for their feedback and any data to support their position on the Adelaide Park Lands Dry Area Regulation.

## Response to Engagement and Submissions

A total of 42 written submissions were received and are summarised in this document.

Feedback was received from:

- Shelter SA
- University of Adelaide
- SA Network of Drug and Alcohol Services (SANDAS)
- Aboriginal Legal Rights Movement
- SAPOL
- SA Ambulance Service
- Department of Human Services (DHS)
- Sister Janet Mead's Adelaide Day Centre for Homelessness Persons Inc
- 30 x YourSAy submissions
- 4 emails

City of Adelaide also sought comment and feedback on the Adelaide Park Lands Dry Area Regulation from:

- Kadaltilla / Adelaide Park Lands Authority (28 September 2023)
- City of Adelaide Reconciliation Committee (6 September 2023)
- Kurna Yerta Aboriginal Committee (KYAC) (9 October 2023)
- Safety and Wellbeing Taskforce (September 2023 and 17 October 2023)

Online engagement was undertaken through YourSAy. The engagement response was as follows:

- **209 'Aware' visitors:** these are unique visitors, which could be individuals or individuals visiting on behalf of organisations, who made 265 visits to the YourSAy Adelaide page.
- **77 'Informed' visitors:** these are visitors that have explored the available consultation materials more closely to learn more about the project by browsing through the consultation information available.
- **30 'Engaged' visitors:** these are the people who have submitted feedback through the online survey.

Table 1 summarises responses to the engagement questions:

### Summary of Consultation

A summary of consultation responses to YourSAy follows (refer Table 1):

- Slightly more YourSAy respondents supported extension of the Dry Areas (refer question 1 and 4 in Table 1).
- The highest YourSAy response regarding changes to Area 2 - Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21) was to retain the existing Dry Area Regulation.
- Views on how often the Dry Area Regulation should be reviewed varied across respondents.

Table 1 YourSAy responses

Your SAy Question		Response	Number
Q1.	Should the Adelaide Park Lands Dry Area regulations be extended or removed?	Extend	16
		Remove	12
		Neutral	2
		<b>Total responses</b>	<b>30</b>
Q2.	If the regulations continue, should there be any changes to the Dry Areas in Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21) which are 24 hours a day, 7 days a week?	Current dry area to remain in place	15
		Remove all restrictions	7
		Remove restrictions or standardise this dry area with other Adelaide Park Land areas	1
		Dry Area restrictions to be standardised with other Adelaide Park Lands Dry Areas	4
		Unclear	2
		<b>Total responses</b>	<b>29</b>
Q3.	If the regulations continue, should the extension be for two years (as has previously been the case) or a different timeframe?	Remove altogether	5
		Review often	2
		Extend for one year	3
		Two years	6
		Five years	2
		Ten years	1
		Indefinitely	6
		Unclear timeline for extension	3
		<b>Total responses</b>	<b>28</b>
Q4.	To what extent do you support an extension to the existing Adelaide Park Lands Dry Area regulations:	Strongly Agree	14
		Agree	2
		Neutral	2
		Disagree	0
		Strongly Disagree	12
		<b>Total responses</b>	<b>27</b>

### **Key Themes Arising from Consultation**

The key themes arising from written responses to the consultation, workshops and meetings include (refer to Table 2 and Table 3):

- The Adelaide Park Land Dry Areas are not of themselves seen as a solution to alcohol related anti-social behaviour in the Adelaide Park Lands and additional long-term solutions to complex social needs are required.
  - The need for a comprehensive data collection and evaluation process to occur to inform decision making for future extension of the Dry Area.
  - Culturally appropriate preventative measures and holistic wrap around support services to vulnerable community members need to be implemented to support community members in crisis.
  - A clear rationale for the Dry Areas is required including additional data and analysis of the effectiveness and impacts.
  - The application and processes for exemption etc may require further communication to Adelaide Park Land users.
  - The importance of public safety and amenity is the main reason the Dry Areas are supported by respondents.
  - In contrast, some respondents view the Dry Areas as discriminatory and/or disproportionately affecting Aboriginal communities.
  - A number of constructive suggestions were made to address systemic matters associated with effectively intervening to reduce alcohol dependencies and support health outcomes that are outside of the Dry Area Regulation considerations.
- Organisations that are first responders to anti-social behaviour, safety incidents and emergency response generally supported extension of the Adelaide Park Land Dry Area Regulation with some provision of data to demonstrate need and effectiveness.
  - Active engagement with the Kurna Yerta Aboriginal Corporation (KYAC) is required before any decision is made about use of Kurna land by remote and regional visitors.

### **Customer Enquiry Analysis January 2019 to August 2023**

Administration undertook an analysis of City of Adelaide customer enquiries regarding Dry Areas for the period January 2019 and August 2023. One hundred and six calls were received by the City of Adelaide customer centre, of those responses:

- 15 people raised questions about how Dry Area Regulation related to holding a private event.
- 86 people requested general information about the Adelaide Park Land Dry Area Regulation.
- 3 people raised concerns about the impact of the Dry Area Regulation on their ability to drink alcohol socially when using the Adelaide Park Lands.
- 2 people commented on the discriminatory nature of Dry Areas.

Table 2 Summary of Submissions to Adelaide Park Lands Dry Area Regulation Consultation 2023

	Stakeholder	Summary of Submission	Key Theme	Response
	<b>Email 1</b>	<p>Not supportive of continuation of the Dry Areas in Adelaide City Park Lands. Understands the regulations may mainly be driven by residents living near the Park Lands.</p> <p>Lack of evidence that a Dry Area will lessen the harmful effects of misuse of alcohol in public spaces. Suggested a review of Public Intoxication Act 1984.</p> <p>Alcohol consumption in Park Lands an issue to be framed within a public health and harm minimisation context.</p> <p>Dry Areas do not work without other simultaneous strategies and resources.</p>	<p>Not supportive of the regulations Need for evidence for Dry Areas. The Dry Area is not seen as a standalone solution. Concerns that Dry Areas are discriminatory.</p>	<p>If the Adelaide Park Land Dry Areas are extended the City of Adelaide will work with members of the Safety and Wellbeing Taskforce to monitor and develop a comprehensive monitoring and evaluation strategy.</p> <p>City of Adelaide works with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people.</p>
	<b>Email 2</b>	<p>Dry Areas makes the Park Lands safer for everybody.</p> <p>Alcohol consumption on any premises increase the likelihood of violence.</p>	<p>Importance of public safety and amenity.</p>	<p>Support for current regulation.</p>
	<b>Email 3</b>	<p>Support for the current Dry Area in the Adelaide Park Lands.</p> <p>Safety concerns of alcohol fuelled violence and abuse.</p>	<p>Importance of public safety and amenity.</p>	<p>Support for current regulation.</p>
	<b>Email 4</b>	<p>Continuation of Dry Areas is essential.</p> <p>South Terrace resident witnessed alcohol induced and antisocial behaviour and litter left in the Park Lands.</p>	<p>Importance of public safety and amenity.</p>	<p>Support for current regulation</p>

	Stakeholder	Summary of Submission	Key Theme	Response
		<p>Recognises it is only a small group of people.</p> <p>Concern regarding Adelaide's reputation.</p>		
<b>Your Say Summary</b>				
	<b>YourSay Submission</b>	The Adelaide Park Lands need to be accessible for all members of society. When Dry Zones are created in the Adelaide Park Lands, the issue of alcohol consumption tends to relocate where it re-occurs. The approach of isolating sections of parkland will not solve the issue of alcohol consumption.	The Dry Area is not seen as a standalone solution	City of Adelaide works with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people.
	<b>YourSay Submission</b>	The Council is not receptive to the concerns of its residents who need rationale as to why Dry Zones have been introduced. There does not seem to be an approval from residents enacted through the Dry Zone process.	Rationale for introduction of Dry Areas requires explanation	Previous approvals have involved community consultation and have been approved by Council and the relevant Minister.
	<b>YourSay Submission</b>	Dry Areas are necessary to control those choosing to be a public nuisance and risk. They must be policed and enforced rather than ignored by police.	Importance of public safety and amenity	City of Adelaide continues to work in collaboration with SAPOL to address public safety.
	<b>YourSay Submission</b>	Believe that the Adelaide Park Lands of Adelaide are a wonderful and incredibly valuable part of Adelaide's lungs and character.	General comment on the Adelaide Park Lands	Not directly related to Dry Areas.
	<b>YourSay Submission</b>	They (Adelaide Park Lands) should be available to all. Admire the Council for doing its best to administer them correctly. Deplore the State	General comment on the Adelaide Park Lands	Not directly related to Dry Areas.

	Stakeholder	Summary of Submission	Key Theme	Response
		Government for stealing them e.g WCH development and building massive structures that have no place in this open space.		
	<b>YourSay Submission</b>	This is an important critical issue that affects local residents and visitors to the area as well as gardeners, police, and others. It has reduced the local crime in the area and restored the area as a beautiful place to visit and show off the Council's work. The issue of long-term drinking can be sorted with efforts of setting up a camp/centre in Ellis Park.	Importance of public safety and amenity Support for a camp in the Adelaide Park Lands	City of Adelaide works with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people.
	<b>YourSay Submission</b>	The Dry Zone areas and the restriction of consuming alcohol within these areas is discriminatory.	Concerns that Dry Areas are discriminatory	City of Adelaide works with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people.
	<b>YourSay Submission</b>	It should be possible to apply for and gain an exemption in case of special events.	Events both public and private can apply for a licence	Events both public and private can currently apply for a license.
	<b>YourSay Submission</b>	All parks should be dry areas 24/7.	Dry area regulations to extend to all hours	Area 2 - Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21) to be retained as 24/7 Dry Areas.
	<b>YourSay Submission</b>	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 has 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.	Importance of public safety and amenity	Support for current regulation.

	<b>Stakeholder</b>	<b>Summary of Submission</b>	<b>Key Theme</b>	<b>Response</b>
	<b>YourSay Submission</b>	The creation of the dry area was a racist state government action and all dry area constraints should be removed immediately.	Concerns that Dry Areas are discriminatory (and should be removed)	City of Adelaide continues to work with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people.
	<b>YourSay Submission</b>	Dry Zone areas do not solve the issue of alcohol consumption in the Adelaide Park Lands as it still takes place within these sections. It is a nanny state reaction. If it is enforced, it will enable social profiling and racial prejudice. The Dry Zone is ridiculous and will not solve the underlying issues of substance abuse as it moves the issue elsewhere. There is nothing wrong with having a glass of 'something' and this ought not to be breaking the law.	The Dry Area is not seen as a standalone solution. Concerns that Dry Areas are discriminatory	City of Adelaide continues to work with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people.
	<b>YourSay Submission</b>	The Adelaide Park Lands are safer when dry. The complete Adelaide Park Lands should remain a dry zone.	Importance of public safety and amenity	Support for current regulation.
	<b>YourSay Submission</b>	Before the dry area there was a significant problem with drunkenness, assaults and harassment of people trying to enjoy our Adelaide Park Lands. The dry areas have improved behaviour a great deal and should be retained.	Importance of public safety and amenity	Support for current regulation.
	<b>YourSay Submission</b>	The Adelaide Park Lands Dry Zone has been successful and is working well.	Support for current regulation	Support for current regulation.
	<b>YourSay Submission</b>	Please remove the 24/7 dry zones from Parks 20 and 21 so that they can be used by all people.	Request to remove 24/7 dry area	Area 2 - Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21) to be retained as 24/7 Dry Areas.



	<b>Stakeholder</b>	<b>Summary of Submission</b>	<b>Key Theme</b>	<b>Response</b>
	<b>YourSay Submission</b>	Have experienced threats to personal safety which the Dry Areas help to address. Don't believe that it is the people who are forced to sleep rough are those that have exhibited anti-social behaviour.	Importance of public safety and amenity	City of Adelaide continues to work in collaboration with SAPOL to address public safety.
	<b>YourSay Submission</b>	It is important that the opinion of residents who are directly impacted by this decision are heard and not outweighed by 'Silent objectors'. Concerned about enforcement by authorities and inconsistency between Hindley Street enforcement and other areas of the city.	Importance of public safety and amenity	City of Adelaide continues to work in collaboration with SAPOL to address public safety.
	<b>YourSay Submission</b>	Dry areas are a nuisance to most users of the Adelaide Park Lands for picnics etc. They are generally ineffective because they require significant resources for effective policing.	Dry Areas not seen as effective	City of Adelaide is proposing to retain the current Dry Areas based on consultation feedback.
	<b>YourSay Submission</b>	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.	The Dry Area is not seen as a standalone solution	City of Adelaide continues to work with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people.
	<b>YourSay Submission</b>	The Dry Zones enforce racism and are unnecessary, even for people who do not consume alcohol. They need to be removed as they only further criminalise those who are already disadvantaged.	Concerns that Dry Areas are discriminatory	City of Adelaide continues to work with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people

	<b>Stakeholder</b>	<b>Summary of Submission</b>	<b>Key Theme</b>	<b>Response</b>
	<b>YourSay Submission</b>	The Dry Zones need to be enforced.	Importance of public safety and amenity	City of Adelaide continues to work in collaboration with SAPOL to address public safety.
	<b>YourSay Submission</b>	The Dry Zones are working well compared to the 'dark days'.	Importance of public safety and amenity	City of Adelaide is proposing to retain the current Dry Areas based on consultation feedback.
	<b>YourSay Submission</b>	The Kingston Gardens - Park 23 would benefit from being made into a dry zone area. Over the years the Adelaide Cricket Club and the Raptors Soccer Club have had continual problems with drunkenness, anti-social behaviour, and their grounds have been left in filthy condition with broken glass.	Importance of public safety and amenity	Park Land Dry Area 1 applies to Park 23.
	<b>YourSay Submission</b>	Should be extended to Park 17	Park 17 is subject to the Dry Area Regulation	Park Land Dry Area 1 applies to Park 17
	<b>YourSay Submission</b>	Imposing Dry Areas is an easy step to make it appear that government is committed to resolving issues such as anti-social behaviour but research has consistently demonstrated that a harm minimisation strategy is more effective. The difficulty of implementing effective management strategies such as affordable accommodation, readily available effective treatments, and prohibition of low cost; high alcohol products does not mean that these measures should not be put into place. Dry areas in the city simply drives more drinkers into the myriad bars and hotels within the city.	The Dry Area is not seen as a standalone solution.	City of Adelaide continues to work with the Safety and Wellbeing Taskforce to seek wrap around services for vulnerable people

Table 3 Summary of Written Submissions to Adelaide Park Lands Dry Area Regulation Consultation 2023

Summary of Submission	Response
<b>Aboriginal Legal Rights Movement</b>	
<p>Supportive of the proposal that a Sobering Up Unit be established in the east end of the city.</p> <p>Reference the Royal Commission into Aboriginal Deaths in Custody.</p> <p>Regulations create the potential for excessive fines to be imposed upon intoxicated people, which is not a deterrence. It doesn't address the causes which leave to the drinking in public parks in the first place.</p> <p>Suggested recommending to the State Government that it includes abandoning expiation notices and broadening criteria for detention of intoxicated persons.</p>	<p>The City of Adelaide will continue to advocate to the State and Federal government for wrap around services for vulnerable people including appropriate facilities.</p> <p>The City of Adelaide will continue to undertake community development and preventative initiatives for the community and visitors.</p> <p>Consultation feedback on the Dry Area Regulation will be provided to the State Government.</p>
<b>South Australian Network of Drug and Alcohol Services (SANDAS)</b>	
<p>Lack of strong evidence base for the effectiveness of dry areas in Adelaide.</p> <p>SANDAS made the following observations:</p> <ul style="list-style-type: none"> <li>• Dry zones often benefit one group in the community over another</li> <li>• Perverse outcomes of dry areas due to replacement alcohol with illicit drugs</li> <li>• Relocation of people</li> <li>• Drinking in private premises increasing likelihood of harm drinking can cause to others</li> </ul> <p>For dry areas to be effective they need to be integrated into a comprehensive suite of responses to public drinking and intoxication. A number of examples were given.</p> <p>Recommendations provided by SANDAS:</p> <ul style="list-style-type: none"> <li>• Commissioner for Licensing and Gaming consider implications of dry areas.</li> <li>• Decision to impose dry area made at the request of in consultation with the relevant community stakeholders.</li> <li>• City of Adelaide provide evidence of full community consultation.</li> </ul>	<p>If the Adelaide Park Land Dry Areas are extended the City of Adelaide will work with members of the Safety and Wellbeing Taskforce to monitor and develop a comprehensive monitoring and evaluation strategy.</p> <p>The City of Adelaide will use evaluation outcomes to inform future consideration of Dry Area extension or revocation in the future.</p> <p>The City of Adelaide will continue to advocate to the State and Federal government for wrap around services for vulnerable people.</p> <p>The City of Adelaide has supported the Safer Places to Gather area in the Park Lands to support remote visitors led by Department of Human Services.</p> <p>City of Adelaide will continue to advocate to the Consumer and Business Services on improvements to the Liquor Licensing Act and the associated regulations.</p>

Summary of Submission	Response
<ul style="list-style-type: none"> <li>• Concerns regarding use of online surveys not being sufficient to seek input from the public.</li> <li>• Consideration of licensing of on-off premises license consistent with dry area expectations.</li> <li>• Consideration to be given to Aboriginal groups and meeting place(s) in and around the city in dry areas establishment.</li> <li>• Concerns regarding use of infringement notices and the effect on marginalised people (inability to pay fines, accrual of fines, leading to eventual imprisonment). Suggested potential alternative treatment programs as an alternative.</li> </ul> <p>Summarised with need to balance between the competing demands of all the members having a right to drink and drinking that causes harm to others should be subject to certain controls. Suggested including the capacity within legislation to create wet areas where drinking is permitted but controlled with support services focussed on these areas.</p>	
<b>South Australian Ambulance Service (SAAS)</b>	
<p>The data analysed for this submission was achieved through analysing how cases were categorised at the time of the Triple Zero (000) call.</p> <p>SAAS is unable to differentiate between attendances for drug use, alcohol use, or a combination of both. Hence the data presented is for both drug and alcohol attendance.</p> <p>SAAS data shows a reduction in the number of drug and alcohol related incidents in Park 20 and 21 for 2022 after the implementation of the 24/7 dry areas for these parks in 2021. A peak in overall incident numbers is recorded for Park 21 during 2021 and it is hypothesised that this may be due to the establishment of the COVID Camp in this area.</p> <p>The South Australian Ambulance Service agrees with the extension for at least a 2-year period stipulating that this should enable ‘cleaner’ data capture following the COVID pandemic restrictions.</p>	<p>City of Adelaide will engage with South Australian Ambulance service if Dry Areas are extended as a part of any comprehensive monitoring and evaluation process.</p>

Summary of Submission	Response
<p>As outlined, SAAS remains committed to supporting any initiatives that work to attain and maintain a safer environment for all members of the community.</p>	
<p><b>Sister Janet Mead’s Adelaide Day Centre for Homeless Persons (Adelaide Day Centre)</b></p>	
<p>The Adelaide Day Centre does not support the proposed continuation of dry zones within the Adelaide Park Lands, for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Extensive research consistently shows that Dry Zones are ineffective in managing anti-social behaviour and at best, they move a problem.</li> <li>2. Events in the Park Lands such as Tasting Australia, WOMADelaide and during the Fringe Festival vendors are selling alcohol subject to waivers from the City of Adelaide.</li> </ol> <p>As per Shelter SA email to their members, the Adelaide Day Centre upholds that effective intervention that in place of a dry zone would include:</p> <ul style="list-style-type: none"> <li>• Delaying the age of first use of substances including alcohol</li> <li>• Treatment responses that include counselling, withdrawal management and medication assisted treatment</li> <li>• Residential rehabilitation</li> <li>• Building individual and community resilience - employment initiatives, school retention, alcohol pricing strategies</li> <li>• Reduction to exposure to alcohol promotion</li> <li>• Prohibiting the supply of cheap high-alcohol content products</li> <li>• Trading hour restrictions</li> <li>• Community led dry declarations</li> <li>• Enforcement of liquor laws</li> <li>• Appropriate, affordable accommodation</li> <li>• Community constables and Aboriginal police officers</li> <li>• Sobering-up services and the de-criminalisation of public intoxication</li> </ul>	<p>The City of Adelaide will continue to advocate to the State and Federal government for wrap around services for vulnerable people and for increased funding towards preventative strategies and initiatives.</p> <p>The City of Adelaide will continue to undertake community development and preventative initiatives for the community and visitors.</p> <p>If the Adelaide Park Land Dry Areas are extended the City of Adelaide will work with members of the Safety and Wellbeing Taskforce to monitor and develop a comprehensive monitoring and evaluation strategy.</p> <p>City of Adelaide will continue to advocate to the Consumer and Business Services on improvements to the Liquor Licensing Act and the associated regulations.</p>

Summary of Submission	Response
<p>The Adelaide Day Centre upholds that the Dry Zones areas are instrumental in the 'moving on' <i>rough sleepers, the mentally ill and the homeless to areas where outreach services cannot assist them.</i></p> <p>As referenced by the Adelaide Day Centre, in 2015 the City of Adelaide developed new strategies to tackle alcohol related anti-social behaviour in the Adelaide Park Lands – which included an extension to the Dry Zone. The original 12-month extension has been extended by eight years whereby <i>anti-social behaviour is at an all-time high.</i></p>	
<b>Shelter SA</b>	
<p>Shelter SA does not support the continuation of the dry zone regulations in the Park Lands for the following reasons:</p> <ol style="list-style-type: none"> <li>1. There is no evidence that a dry zone is an effective measure to manage public intoxication, or the harm caused by the misuse of alcohol.</li> <li>2. The dry zone may disproportionately affect Aboriginal people who gather in the Park Lands, the dry zone regulations appear to be discriminatory.</li> <li>3. The consumption of alcohol in the Adelaide Park Lands is an issue that should be framed within a health and harm minimisation context for the benefit of Aboriginal and non-Aboriginal people alike.</li> <li>4. The impetus for the implementation of a dry zone seems to predominantly emanate from residents living near the Adelaide Park Lands who make complaints about public intoxication, rather than an interest in improving public safety or public health by Council.</li> <li>5. A more effective and less punitive approach to the consumption of alcohol in the Adelaide Park Lands would be a higher-level policy approach involving a review of the Public Intoxication Act 1984 as has been recommended by the Aboriginal Legal Rights Movement for many years.</li> </ol>	<p>If the Adelaide Park Land Dry Areas are extended the City of Adelaide will work with members of the Safety and Wellbeing Taskforce to monitor and develop a comprehensive monitoring and evaluation strategy.</p> <p>The City of Adelaide will continue to advocate the State and Federal government for wrap around services for vulnerable people and for increased funding towards preventative strategies and initiatives.</p> <p>The City of Adelaide will continue to undertake community development and preventative initiatives for the community and visitors.</p>

Summary of Submission	Response
<p>As per the Shelter SA email to their members, Shelter SA state that Dry Zones do not work without other simultaneous strategies and resources that include the following elements of harm minimisation:</p> <ul style="list-style-type: none"> <li>• Treatment responses that include counselling, withdrawal management and medication assisted treatment.</li> <li>• Residential rehabilitation</li> <li>• Building individual and community resilience - employment initiatives, school retention, alcohol pricing strategies</li> <li>• Reduction to exposure to alcohol promotion</li> <li>• Prohibiting the supply of cheap high-alcohol content products</li> <li>• Trading hour restrictions</li> <li>• Community led dry declarations.</li> <li>• Enforcement of liquor laws</li> <li>• Appropriate, affordable accommodation</li> <li>• Community constables and Aboriginal police officers</li> <li>• Sobering-up services and the de-criminalisation of public intoxication</li> </ul>	
<p><b>University of Adelaide</b></p>	
<p>Propose the Park Lands Dry Areas regulations be extended for 2 years.</p> <p>The Adelaide Park Lands dry areas restrictions do not have significant impact on student and staff usage of Park Lands.</p> <p>Future consultations on the issue to include data supporting the benefits of the Dry Area Restrictions including safety outcomes, increased use and evidence of a reduction in alcohol related crime and /or violence.</p>	<p>If the Adelaide Park Land Dry Areas are extended the City of Adelaide will work with members of the Safety and Wellbeing Taskforce to monitor and develop a comprehensive monitoring and evaluation strategy.</p>
<p><b>South Australian Police (SAPOL)</b></p>	
<p>SAPOL conducted an analysis of a range of data sources. Analysis indicated an increase in police taskings for the Adelaide Park Land</p>	<p>If the Adelaide Park Land Dry Areas are extended the City of Adelaide will work with members of the Safety and Wellbeing Taskforce to monitor and develop a comprehensive monitoring and evaluation strategy.</p>

Summary of Submission	Response
<p>Areas 1 and demonstrates that the Park Lands Dry Areas 1 and 2 are experiencing a high incidence of alcohol events.</p> <p>Dry Areas concept is one of a number of initiatives that has reduced alcohol related harm, crime and disorder in Adelaide North Adelaide and Adelaide Park Lands.</p> <p>Supports the continuation for a further two-year period.</p> <p>SAPOL are concerned that removing the Adelaide Park Lands Dry Areas would have a detrimental impact on community safety.</p> <p>Enforcement of the Dry Area provisions allow SAPOL to address alcohol- related problems through enforcement of alcohol possession and consumption prohibition.</p> <p>SAPOL provided confidential data to be used only by the City of Adelaide Administration in its recommendation.</p>	
<p><b>Department of Human Services</b></p>	
<p>Strongly support an extension of the Adelaide Park Lands Dry Areas Regulation.</p> <p>Alcohol restrictions that have been put in place through the Regulation have been an important element of the Safety and Wellbeing Taskforce’s approach to addressing high risk behaviour.</p> <p>The Taskforce’s approach has implemented innovative responses over the last two and a half years. To achieve reductions in risky behaviours in residential and public settings such as Whitmore and Victoria Square, reduction in Hospital ED presentations and admission, improved participation in health treatment (chronic and acute), improved outcomes in tenancies, and significant improvements in service coordination.</p> <p>In response to scalation of alcohol related high-risk behaviour along North Terrace precinct earlier this year, the Taskforce implemented a range of measures to address these community safety concerns. To complement these responses and address the needs of this high-risk population, DHS has led the establishment of the Safer Place to</p>	<p>If the Adelaide Park Land Dry Areas are extended the City of Adelaide will work with members of the Safety and Wellbeing Taskforce to monitor and develop a comprehensive monitoring and evaluation strategy.</p> <p>The City of Adelaide will continue to advocate to the State and Federal government for wrap around services for vulnerable people including through the Safety and Wellbeing Taskforce.</p> <p>The City of Adelaide will continue to monitor and work with Safety and Wellbeing Taskforce to implement the Safer Places to Gather area in the Park Lands to support remote visitors.</p>



Summary of Submission	Response
<p>Gather (SPTG) site at Edwards Park. Provides vulnerable remote Aboriginal visitors who are rough sleeping and impacted by alcohol misuse and chronic health conditions a safe setting to seek shelter, socialise, and access culturally appropriate support services.</p> <p>Since commencement in August 2023, it has been well utilised by remote visitors' positive feedback by all Taskforce agencies and outreach services on the impact the response has had in reducing high risk behaviour and alcohol related harm in the CBD</p> <p>Since the implementation of these multiagency responses including SPTG, there have been a significant reduction in high risk behaviour and alcohol related trauma and violence in the CBD and North Terrace. Data from DHS' Census Outreach App indicates that, since the introduction of all the measures, remote visitor groups identified as high risk (publicly intoxicated, intergroup fighting) reduced from a high or 37% in June 2023 to 0% in the following three months.</p> <p>DHS recognised that Dry Area restrictions are only one part of a more comprehensive service led approach to reduction the negative impact of alcohol misuse. But the Taskforce's multifaceted responses are independent on each other. Concerns that if Dry Area restrictions are eased they hold genuine concern that vulnerable persons may engage in excessive alcohol consumption in higher risk settings in the CBD or suburban locations, leading to an increase risk of misadventure (e.g. traffic incidents) partner/domestic violence, police involvement and/ or apprehensions, and assaults and alcohol related trauma presentations.</p>	