

From: Noris Ioannou <noris.ioannou@internode.on.net>
Sent: Tuesday, October 31, 2023 12:07 PM
To: YourSay <Y.Adelaide@cityofadelaide.com.au>
Subject: Buildings on parklands

My view is that there should be a reduction of the number of buildings on the Parklands.

They are invariably intrusive and look ugly in the trees, gardens and lawn areas, especially so those built for sports bodies.

The Parklands are for open green areas. No more building, and in fact reduce the number already there,

with thanks
Noris Ioannou

From: John Panagaris <johnpana4@outlook.com>
Sent: Friday, October 27, 2023 11:45 AM
To: YourSay <Y.Adelaide@cityofadelaide.com.au>
Subject: Park Lands Community Buildings Policy

I am writing to you as a concerned member of a sporting club to express my deep distress regarding the recent proposals to alter the existing framework that sustains our local sporting clubs.

I have learned about the council's intentions to remove essential elements such as liquor licenses, current lease agreements, advertising and sponsorship opportunities, player payments, and even parking facilities in Parklands.

I cannot begin to emphasize how detrimental these changes would be to our community, particularly the vibrant sporting culture that has been nurtured over the years.

The prospect of dismantling the fabric of our sporting clubs is nothing short of ludicrous and deeply irresponsible.

These clubs serve as crucial outlets for our youth, offering them an opportunity to engage in positive activities, stay away from the streets, and foster valuable life skills through sportsmanship and teamwork.

The clubs also act as pillars of support for talented athletes, providing them with the necessary sponsorship and financial assistance to pursue their passion and represent our community at various levels.

I want to make it clear that I, along with countless others who share my sentiments, will vehemently oppose these proposed changes.

We are prepared to fight for the preservation of our sporting clubs, and our commitment to this cause will be demonstrated through peaceful protests, uniting all the affected sporting clubs and other community organizations that stand in solidarity with our cause.

At this stage, there is a very significant amount of people from various sporting clubs who will gather at your doorstep to ensure our voices are heard, emphasizing the importance of preserving these institutions for the well-being and future of our community.

I implore you to reconsider these proposals and acknowledge the invaluable contributions our sporting clubs make to the social fabric of Parklands.

By supporting these clubs, we are investing in the future of our youth, promoting community cohesion, and fostering a sense of pride and identity among our residents.

The consequences of changing these clubs would be severe and far-reaching, affecting not only the current generation but also generations to come.

I urge you to act in the best interests of our community, its youth, and the spirit of unity that our sporting clubs represent.

Please do not proceed with these detrimental changes, as they will undoubtedly face strong opposition from the concerned sporting people.

Thank you for your attention to this urgent matter. I look forward to a positive resolution that preserves the future of our beloved sporting clubs.



17/11/2023

Ray Scheuboeck

Team Leader, Community Lifestyle

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Dear Ray

Thank you for the opportunity to comment on City of Adelaide's Draft Park Lands Community (Sport and Recreation) Buildings Policy (the Policy).

Green Adelaide supports the principles outlined in the Policy for no nett loss of parklands, and no loss of trees. The use of permeable surfaces wherever possible is also strongly recommended.

Green Adelaide would like to see Performance Criterion 3.2 expanded to more explicitly state that water-sensitive urban design and biodiversity-sensitive urban design are key goals of the Policy.

We suggest that in this criterion:

- the phrase "*green roofs to reduce building heat absorption and promote biodiversity*" should be replaced with "*biodiversity-sensitive urban design including green roofs and walls to reduce building heat absorption and promote biodiversity*"; and
- the phrase "*water-sensitive urban design to minimise additional runoff and allow for in-situ storage and reuse of water*" should be added.

Please note that works to replace or repair community buildings located on the banks or floodplains of watercourses within the parklands may require a water affecting activity permit issued by Green Adelaide.

Green Adelaide officers are happy to discuss any of these issues further with you.

Yours sincerely

A handwritten signature in blue ink that reads "Louisa".

Louisa Halliday
**Manager, Strategy and Performance,
Green Adelaide**



SANFL
ABN 59 518 757 737

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Level 2, Riverbank Stand,
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MAJOR PARTNERS



27 November 2023

Ray Scheuboeck
Team Leader, Community Lifestyle
City of Adelaide
Via email r.scheuboeck@cityofadelaide.com.au

Dear Ray,

Thank you for the opportunity to provide feedback on the Draft Park Lands Community Building (Sport and Recreation) Policy (the Policy).

SANFL is passionate about creating fun, safe and inclusive environments that connect communities and allow all participants to thrive through the enjoyment of footy. We demonstrate this commitment through our programs that are delivered to support people in community football across South Australia.

Participation in female football in South Australia has tripled since prior to the start of AFLW and SANFLW in 2017, with 8,644 female registered club players and more than 400 female teams in 2023. This growth has incredible impact on the way our clubs connect with their local community, the diversification of members and an offering to a whole new target market of people interested in football. Girls from the age of five participating in the entry level AFL Auskick program has also doubled in South Australia since 2016, with 2,866 female Auskickers in 2023. These numbers will continue to grow.

Local councils are integral to the success of our football clubs across the State, and we are committed to partnering with City of Adelaide to achieve the best outcomes for the City and all football participants.

SANFL supports the use of the Adelaide Park Lands for organized sport, in particular Australian Rules football. Currently, football activity occurs in numerous Adelaide Park Land areas. It is vital that to sustain and grow participation and active lifestyles, facilities that support football activity must be fit for purpose, safe and inclusive. The current facility infrastructure does not meet these objectives.

The football clubs that call the Park Lands home continue to demonstrate strong participation and demand for access to programs and facilities. Many of the existing building facilities are non-compliant, have reached the end of their lives and in some instances, are unsafe. The SANFL Infrastructure Strategy 2022-2032 documents the objectives for facilities improvement and refers to the recommended minimum requirements as documented in the AFL Preferred Community Facilities Guidelines (attached). It is vital that any co-funding requirements meet these Guidelines to provide for best outcomes for participants. In some cases, there will

be a need to slightly increase the footprint of an existing facility, even with a modest design, to meet these requirements. We believe that the resulting outcome of these projects will be a better visual outcome than the existing dilapidated buildings.

These football facilities objectives align strongly with the purpose of the Policy which supports the use of and access to the Park Lands through participation in community sport and recreation and acts as a guide to the replacement of existing community sports infrastructure.

SANFL, in partnership with the AFL and State Government have recently announced the SA Football Facilities Fund to support the investment and delivery of facilities improvements. With \$8M in funding available over 3 years, it is an opportune time to deliver projects to improve football facilities in the Park Lands.

SANFL has responded to the City of Adelaide Draft Park Lands Community Buildings (Sport and Recreation) Policy survey, addressing each of the Principles of the Draft Policy. The Draft Policy is a step forward in support of sport in the Park Lands that assists the City to achieve its identified strategy for 'Adelaide: The most liveable city in the world.' Australian Rules Football participation in quality, fit for purpose facilities can support the City's guiding principles of Community Benefit and Accessible Participation, and will strongly contribute to the City of Adelaide achieving the key outcome of Thriving Communities.

We acknowledge the project priority list as documented in the Summary Document – Investing in Community Infrastructure – Sports and Recreation and advocate for the priorities of parks 21W, 20, (Pulteney) and Park 6 (Wilderness).

We look forward to continuing to partner with the City of Adelaide in the current future delivery of football facilities in the Park Lands and welcome further detailed discussion.

Yours sincerely

A handwritten signature in black ink that reads "Belinda Marsh". The signature is written in a cursive, slightly slanted style.

Belinda Marsh
Head of Infrastructure and Government Relations



**Adelaide Community
Sports & Recreation
Association Inc**

Community Consultation
Park Lands Community Buildings
GPO Box 2252, Adelaide SA 5001
yoursay@cityofadelaide.com.au

27 November 2023

To Whom it may concern

I'm writing to you to provide feedback on the Draft Park Lands Community Buildings (Sport and Recreation) Policy on behalf of Adelaide Community Sports and Recreation Association (ACSARA)

ACSARA has been a responsible and well respected tenant of Park 21 West for close to 40 years. It is estimated that ACSARA members together with its sub-lessees would account for well over 30,000 visits to Park 21W per year, and could be grown to closer to 70,000 visits per year with fit for purpose facilities. For example, one of the major users of this area in the parklands, Adelaide Lutheran Sports Club, started a women's football team approximately five years ago, but folded after only two seasons, largely due to lack of suitable unisex changerooms.

We have been working closely with the Adelaide City Council since 2017 when we were successful in the EOI process to redevelop this area of the parklands.

An extraordinary amount of time and effort has been spent working with Council over the last 6 years developing master plans, building concept designs and investment in new playing field lighting to the tune of \$0.5m. ACSARA has also secured its own funding of \$2.7m and has been seeking co-funding from the Council since receiving that funding in late 2021, in order to build a fit for purpose facility.

ACSARA had progressed with a building design to 35% complete when it was placed on hold due to uncertainties around potential Council funding, which also coincided with a change of Council elected members in Nov 2022.

In general terms having adequate community buildings in the parklands has many benefits not only to ACSARA.

- Provision of public amenities allows for broader community use of the parklands
- Population growth in the city and surrounding residential areas along with urban infill is placing greater demand on greenspace in the parklands.
- The increase in women and juniors in football and cricket is a huge shift from what were previously male dominated sports. The policy does not directly address this requirement but there is a huge shortage of suitable facilities for womens and junior sport.

- Maintenance of grounds is largely left as the responsibility of the lessee. Local storage of maintenance equipment is required to keep these spaces green and usable all year round.
- Council has identified structured and unstructured participation in sport and recreation activities is an important contributor to liveability. This doesn't happen without groups who provide the necessary facilities to support this.

There seems to be a perception by some of the elected members of Adelaide City Council that all that sporting groups need to provide community sporting opportunities in the parklands is toilets and changerooms. But community sport extends to much more than just on field activities. Parents need somewhere to shelter and socialise while their children are participating in sport. Sporting groups need somewhere to build community before and after sporting activity. A Council report identifies the 2015 study by La Trobe University which found for every \$1 spent to run a football club, there was at least \$4.40 return in social value in terms of increased social connectedness, wellbeing, and mental health status; employment outcomes; personal development; physical health; civic pride and support of other community groups. So where does community sport start and end? Sporting groups are finding it harder and harder to survive financially, so shouldn't an effort be made to ensure the survival of the organisations. If sporting organisations are not permitted to build community and raise essential funds to survive like organisations in other council jurisdictions then there will be a dramatic decrease in the use of facilities and ovals in the parklands, and facilities will remain derelict.

This draft policy is seen as an important step towards bringing the required building infrastructure to fruition. In general terms ACSARA is strongly in support of this policy. I've addressed each of the five principles/performance criteria below.

Principle 1 - Balance a minimal infrastructure footprint and scale with fit for purpose facilities required to support local community sport.

There are 3 Performance criteria, and we strongly agree with each of them.

Park 21W is a sporting hub in the truest sense. Beside ACSARA member organisations which cover Football, Cricket, Netball (mens/womens, junior/senior), there are a large number of sub-lessees covering an even broader range of local community sporting activities and cultures.

Fit for purpose facility therefore need to cater for all of this (including change room requirements of peak bodies), umpires/officials, trainers/first aid, a myriad of storage, meeting rooms and sufficient space to provide a safe, secure social space for spectators, parents/grandparents, and the general community. Allowing for 'non-sporting activities as a secondary use' is essential in allowing sporting organisations to support themselves and be financially viable.

Principle 2 – Deliver community buildings that perform their purpose while prioritising no net loss of Park Lands.

There are 3 Performance criteria, and we strongly agree with each of them.

Replacement of old, unsafe, inadequate buildings is critical and we agree that priority should be given to new buildings that meet the outlined criteria.

ASCARA's current building design provides fit for purpose facilities over a two level building with minimal loss of parklands space once the existing building is removed. The design incorporates features such as adequate storage space to cater for the wide range of equipment required for the different sporting activities. It also incorporates flexibility when it comes to changerooms that can be divided into smaller changerooms for sports with smaller team sizes such as soccer and cricket.

Principle 3 – Maximise sustainable development and environmental performance of community buildings.

There are 2 Performance criteria, and we moderately agree with each of them.

While environmental performance and Green Star ratings are desirable objectives, there is likely to be a trade-off with cost, and community groups cannot reasonably be expected to fund this without Council contribution. The criteria for no loss of existing trees is unreasonable, and it would be far better to have an objective where there is a net increase in trees, which would mean an occasional unregulated tree could be replaced with multiple new trees.

Principle 4 – Create high quality welcoming and accessible facilities to maximise community use.

There are 2 Performance criteria, and we strongly disagree with each of them.

While we agree that accessibility is an important aim, it is naive to think that single level buildings could be built that are 'fit for purpose' AND result in no net loss of parklands. Smart, well-designed two-story buildings are an obvious solution to managing building footprint while still providing facilities that are 'fit for purpose'.

We would also like to emphasise that in certain circumstances where on-street parking is both limited (eg clearways) and dangerous given the amount of traffic (eg Goodwood Rd), that reasonable car parking be supported. Such car parking can be on permeable surfaces and is not difficult to design and manage in a way that protects the parklands.

Principle 5 – Support diverse participation through equitable co-funding.

There is only 1 Performance criterion, and we strongly agree with it.

Our project meets the co-funding criteria in the draft policy, and we strongly urge Council to consider allocating budget for this project in 2024/25 budget.

ACSARA also provided feedback over 12 months ago in relation to the proposed Lease and Licence Policy relating to parklands sporting facilities. We believe that the Lease and Licence Policy is inter-related to this Building Policy. In order for Lessees to invest in building infrastructure in the parklands there needs to be adequate security of tenure in proportion to the amount of investment by the Lessee. Therefore it is important that this related policy works hand in hand with this building policy and supports co-investment in the parklands.

ACSARA has been working with Council now for many years on this project and trying to 'do the right thing'. We feel that sporting groups that are using their own funds to redevelop grossly inadequate

Council owned facilities should have the support of Council to encourage greater participation and using/maintaining parts of the parklands

The changing nature of sport, particularly in terms of increasing female participation, needs to be recognised by supporting the upgrade of parklands buildings.

Without the adoption of this policy there appears to be no way forward with our project, so we strongly urge the Council to consider adopting this policy, however noting our concerns relating to additional costs related to meeting various environmental targets.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Borgas', with a stylized flourish at the end.

Mark Borgas

ACSARA President



Monday 27th November 2023

City of Adelaide
Community Consultation
Park Lands Community Buildings
25 Pirie Street
ADELAIDE SA 5000

Dear Community Consultation Team,

RE: RESPONSE TO PARK LANDS COMMUNITY BUILDINGS DRAFT POLICY

Thank you for the opportunity to comment on the Draft Park Lands Community Buildings Policy.

The Adelaide Comets Football Club (ACFC) was formed in 1994 (as the Adelaide Raiders Soccer Club) with the view to create a club with a family atmosphere. Already with a vision for the future, the founding Committee set themselves the objective to commence junior teams by the year 2000.

In 2001, the club registered 5 teams in the South Australian Soccer Federation's (SASF) Junior Premier League. During this time, the club's senior team continued to enjoy success in the SAASL winning consecutive Championships in 2001, 2002 and 2003. This ongoing success at the highest level of amateur competition generated the push for a move to a higher league for ACFC.

With the implementation of a new governing body for the sport in South Australia, ACFC entered the newly formed State League in 2006 under the banner of the Football South Australia (FSA). In 2007, its second year in the FSA State League competition, the club took out their first semi-professional Championship, coming first in the competition and earning promotion to the FSA Premier League.

In 2011 the club continued its tradition of growth, by introducing an U11 Junior Girls team to its Open Age Women's team within the FSA Women and Girls Competition. In 2012 the club will field three Junior Girls teams in the FSA competitions.

Since commencing in the FSA competitions, the club has maintained a philosophy of striving for success and this approach has been rewarded by the performances on the field, and the club's steady progression through the leagues culminating in our Senior Men's team winning three Minor Premierships and participating in four grand finals in a row and our Senior Women's team winning their first Minor Premiership and Cup in season 2023.

The club vision and purpose statements are provided in Appendix A, but a key aspect of the club is our engagement in our community. We play an active role through groups such as One Culture, Blind Football, Wheelchair Football and Walking Football. We also work closely with a number of city and inner metropolitan schools, including Adelaide High School, St Marys, St George, Glenunga International High School, Unley Primary School and Prince Alfred College.

A key aspect in our vision is to provide the best opportunities for Junior Girls and Boys to succeed at the highest levels. We work closely with several football academies and our programs have seen a number of senior women and men players progress into the A-League as well as European clubs and ultimately, we have witnessed our first junior player represent the Australian National Team (Socceroos) in the current world cup qualifiers.

We work closely with the City of Adelaide and various community groups in utilising the facilities at Park 24, including the Sikh National Festival (held in Adelaide every 5 years), the Adelaide Crows Football Club with their indigenous carnival as well as various Music Festivals with the use of the clubrooms as a base.



ACFC also share the facilities at Ellis Park with Western Districts Athletics Club who are a long-standing partner.

The club operates as a Non-For-Profit entity and is primarily managed by volunteers across many aspects of our operations.

ACFC have been located in the Adelaide Parklands since 1995 having first started using pitches and clubrooms at Park 17. The club, in collaboration with the City of Adelaide, then moved across various locations within the Parklands and finally relocated to our current home in 2004. In addition to Park 24, ACFC have also leased Park 19 since 2003.

Since being based at Park 24, ACFC, in conjunction with the City of Adelaide, have proactively worked to significantly improve the existing facilities. The first upgrade was focussed on sports lighting with nine (9) new 18m towers installed to meet the minimum FSA requirements at the time (2006).

Since then, the club, in association with Western District Athletics Club, went on to develop the new Clubrooms, replacing two (2) existing buildings that were in very poor condition and not meeting minimum standards, particularly for women in sport. The new clubrooms were finished in 2019 costing \$3.6M which was funded by the state government and provides facilities for use by female and male teams. It is important to note that the new building has exactly the same footprint as the two buildings that it replaced.

Currently, the club is embarking on a further upgrade with the light towers being modernised to more efficient LED type, as well as upgrading the pitch surface to meet senior football requirements and installing pitch fencing to enable Senior WNPL and NPL matches at Park 24.

ACFC has approximately 610 registered players across Women's and Men's senior teams as well as Junior Girls and Boys teams.

We also have over 60 players with Special needs across a number of different football categories. These range from Powerchair Football, Walking Football, Blind Football and Walking Football. We are extremely proud of our relationship with One Culture who not only provides opportunities for people from various cultures to play football, but also provides people with special needs to play football through a number of NDIS programs.

As we are fortunate to be based in the city, we can proudly boast that our players come from across the entire metropolitan area, with some players even travelling from as far as Mt Gambier twice per week.

We have, on a weekly basis, as many as 28 junior games per week played at Park 24. Based on this number of games, we have as many as 1,000-1,200 people attend the site from as early as 8:30am through to 3:00pm every Sunday during the regular season.

As park 24 is the home base for ACFC, training sessions are held from Monday through to Friday each week of the season, with pre-season commencing in November and the season proper finishing at the end of September. Training typically runs from 5:00pm through to 9:00pm.

Our amateur team utilises the grounds every second Saturday during the season, typically from 11:00am through to 5:00pm.

Our juniors play their home games each Sunday of the season with games commencing as early as 8:30am and finishing as late as 3:30pm.

The original lighting upgrade in 2006 cost approximately \$300,000 with ACFC providing \$98,000. The balance of the funds came from the State Government.

The new clubroom project cost approximately \$3.6M with ACFC providing approximately \$150,000. The balance of the funds came from the State Government. ACFC managed this project with the entire funding meeting State Government acquittal requirements.



Currently, the club is upgrading the Pitch and Lighting Facilities to meet FSA WNPL and NPL minimum requirements so that our senior women and men can play at home. This project, which includes the upgrade of the main pitch surface (new lawn, drainage and irrigation), the replacement of the nine (9) existing light towers and lighting, and, the installation of a spectator fence around the main pitch, costs approximately \$1.75M with all funds provided by the State Government. It is important to note that the funding, issued by the Office for Recreation, Sport and Racing, was initiated by ACFC following the submission of an application for grant funding. This project is currently being managed by ACFC and is due to be completed in 2024.

From approximately 2015, the City of Adelaide transferred all water supply costs to ACFC for both the clubroom and the field irrigation. ACFC currently pay, on an annual basis, \$38,000 per year for water supply. We do not receive any additional external funding for water supply.

In approximately 2020, the City of Adelaide transferred all electricity supply costs to ACFC for both the clubroom and the field lighting. ACFC currently pay, on an annual basis, \$30,000 per year for electricity supply. We do not receive any additional external funding for electricity supply.

In approximately 2013, ACFC has been managing the pitch surfaces. ACFC currently pay, on an annual basis, \$75,000 per year for the overall maintenance of the pitches. We do not receive any additional external funding for pitch maintenance.

In addition to the above, ACFC also manages and maintains the Clubrooms which is also a significant cost.

ACFC activities are primarily focused on the use of pitches at both Park 19 and Park 24. Our vision and purpose statement, which is aligned with the City of Adelaide Vision for the Parklands, Community Engagement and City Vibrancy, is based on providing junior girls and boys, as well as their families, with the opportunity to participate in the game of Football.

The pitches and clubroom are vital in enabling ACFC to achieve our vision and support our purpose.

Since being based at Park 24, ACFC have:

- Improved the lighting, not once but twice, which has enabled us to grow our junior teams and increase access to the parklands and the city, particularly in the western parklands.
- Improved the standard of the pitch surfaces, making them safer not only for our players but for all the community who access Park 24.
- Improved the clubroom, and particularly the changerooms, to enable women to have facilities that enable them to safely and comfortably participate in sport at any time.

It is important to note that we believe that the main areas of growth in football are through female participation and players with special needs. These growth areas are fundamental to our vision as a club, which we believe enables families to safely participate in both sporting and community activities.

Our location, as a major football club in this state, means we attract participants from across the entire metropolitan area and from a wide variety of backgrounds. We firmly believe that this model encourages the broader community to visit and spend time in the Parklands and the City Precinct.

We also believe that our facilities, if managed and supported adequately, will enable the City of Adelaide to attract more events to the city as, for example, Park 24 can be used for a training base for A-League female and male teams when they visit to play Adelaide United in Adelaide. Park 24 can be used to host major junior football events attracting players from not only across Australia but from around the globe. We believe this to be the case as we have proved that the facilities are recognised as being of a high standard with FIFA using the facility as a training venue for the FIFA Women's World Cup in 2023. We were proud to have hosted both China and France who trained at the facilities before their World Cup games.



As we have stated above, one of our biggest growth areas is Female Participation in football. Whilst we anticipate that the FIFA Women's World Cup in 2023 held in Australia will encourage substantial growth and female participation in the game generally, ACFC made a concerted effort well before the world cup to grow our Female teams.

ACFC commenced its Junior Girls program in 2011. Since then, ACFC has continued to grow the female program which was the key driver to upgrade the clubrooms. This is also aligned with our participation at the highest level of the game in South Australia, being WNPL.

We firmly believe that any policies being considered **MUST** take into account the requirement to enable female participation in sports generally. This is clear with the current popularity not only in Football Globally, but in other codes such as AFL, Cricket, Rugby Union and Rugby League.

Thank you once again for the opportunity to comment on the Draft Policy being considered. If required, we would be happy to meet with you to provide any additional information or context to our response.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Tsouvalas'.

Jim Tsouvalas
President

Adelaide Comets Football Club Inc.

VISION

With the help of players, volunteers, and sponsors, we will create an enjoyable and supportive club in an environment accessible to all members of the community to achieve our goal to be the premier club in the highest level of competition possible.

PURPOSE STATEMENT

Adelaide Comets FC is a proud community club with foundations built on the hard work of its members, players, volunteers, and loyal supporters. We aim to be consistently competitive and challenge for success, and we will always do this without compromising our underlying culture and values.

We will always strive to make a positive difference to our members and community through the engagement in football and by delivering a safe, friendly, and family oriented environment.

The purpose of our club is to:

- Offer young sportspeople the opportunity to participate in comprehensive training programs that are overseen by suitably qualified coaching staff so that they can reach their full potential.
- Promote football opportunities to the wider community.
- Ensure that we provide an environment that:
 - Encourages greater participation by girls and women.
 - Is free from discrimination and harassment.
 - Promotes the values of fairness, safety, health, and wellbeing.
 - Is socially responsible.
- Work with wider partners, driving greater awareness of our activities and ensuring our stakeholders hold us to account for the decisions we make.
- Actively seek out opportunities to develop and implement innovative projects and initiatives in response to community needs.
- Support our governing sporting bodies by adhering to their rules and regulation and generally being a valued member of their organisations.
- Always operate professionally and in a fiscally responsible manner.

27th November 2023

City of Adelaide
Community Consultation
Park Lands Community Buildings
25 Pirie St
Adelaide SA 5000

To whom it may concern

Re Draft Parklands and Community Buildings (Sport and Recreation) Policy

Thank you for the opportunity to provide feedback on the draft policy. The feedback in this submission is made on behalf of the Board of the Adelaide Lutheran Sports Club (ALSC), and by extension the thousands of current and past members, players, supporters and families.

BACKGROUND

ALSC is one of several member organisations of ACSARA who has leased Park 21W for over 40 years. We have been, and are committed to continue being, an exemplary user that values the community and the parklands.

ALSC currently has over 300 playing members, 200 non-playing members, and thousands of past players across all age groups and genders. The concept of membership is these days quite 'old school'. Instead, ALSC focusses on the concept of community, which includes players, friends and families of players, past players as well as other stakeholders including local businesses (some of which are sponsors), and schools. An often overlooked and under-appreciated category here are visiting/opposition teams, clubs, players, supporters, and families which conservatively increases and attracts the user group tenfold.

Our community ethos is consistent with our core values of inclusivity and togetherness, which have manifested themselves in a club that embraces many players and supporters from regional South Australia, a significant number of tertiary students (particularly University of SA and Adelaide University), and in more recent times families from the local community and local schools such as Sturt St Primary School and Gilles St Primary School. It is also very important to note that ALSC is very supportive of ACSARA's objective of sharing the space with organised sport and recreation with non-ACSARA groups, as well as having a precinct that embraces the public.

Football, cricket, and netball are the three primary codes played, with facilities and multiple fields used typically twice a week in the evenings on weekdays, and virtually every Saturday across the year. Ad hoc club activities, games and training can occur on other days and times during the year.

Over the last 40 years ALSC has invested hundreds of thousands of dollars and a similar number of volunteer hours into both maintaining and redeveloping playing fields and

associated lighting, as well as maintaining the facilities which are (publicly) known to be old, unsafe, deteriorating, and in no way fit for their current purpose let alone potential and expected future usage. A significant financial investment in Park 21W has been made without the security of a long-term lease.

As it stands the current facilities are nowhere near adequate for the existing ALSC usage, however of even bigger concern is the way they have and continue to retard the growth and future participation of young people in sport and recreation:

- Approximately 3 years ago our senior women's side disbanded as the facilities could not accommodate and support them, let alone planned future expansion.
- A junior football programme commenced 7 years ago and despite significant community demand has struggled to recruit and retain new families. A recent club survey confirmed the obvious in that the facilities were not welcoming, functional or safe, especially for junior female footballers, or for the numerous parents, grandparents, and carers.
- ALSC commenced a senior netball code 15 years ago which grew to 17 teams several years ago but has reduced to 14 teams in recent years with the facilities again being the sole reason (no showers, two toilets, one hand basin, and 20m2 of space for over 100
- The club has plans to grow both the existing codes (especially junior football and cricket which is only 3 years old), as well as introduce junior netball. The likelihood of successful growth is currently severely compromised.
- With fit for purpose facilities, conservative growth estimates for ALSC would be to double the number of participants, with the vast majority of these being female, and local ie from the CBD, local schools and surrounding suburbs, especially to the south and south west of the CBD.

POLICY

We have reviewed and considered the draft Parklands and Community Buildings (Sport and Recreation) Policy

1. General feedback

- Overall, the draft policy appears to strike a reasonable balance between activating and protecting the parklands.
- However, the draft policy does not adequately address or acknowledge:
 - Female sport and the increased participation which requires a huge shift in community facilities needed to support it going forward. Most other governments (at all levels) across the entire country recognised this years ago as an extremely positive trend. The Adelaide City Council is a clear laggard in this area, but through this policy have an opportunity to elevate themselves as a role model.

- Population growth in the city and surrounding residential areas, which along with urban infill is placing increased demand on the parklands.
- The contribution and value that sport and recreation groups/associations/clubs provide to the parklands and residents/ratepayers. In the case of ALSC, we have been a primary catalyst in ensuring opportunities exist in the SW parklands for residents, families, students, and visitors to the city. Shouldn't an effort be made to help ensure the survival of organisations such as this? The alternative would see a dramatic reduction in use of parklands facilities and playing fields. This would be an awful legacy for the current elected members to bear, especially when a Council report identifies the 2015 study by La Trobe University which found for every \$1 spent to run a sporting club, there was at least \$4.40 return in social value in terms of increased social connectedness, wellbeing, and mental health status; employment outcomes; personal development; physical health; civic pride and support of other community groups. We would urge you to embrace rather than reject this type of investment, especially since Council has identified structured and unstructured participation in sport and recreation activities as an important contributor to liveability. This doesn't happen without groups like ALSC who help provide, maintain, and manage the associated facilities.
- The draft policy continues the overuse and over rely on the 'footprint' concept. In an environment like the Adelaide parklands where investment in infrastructure that encourages and supports sport and recreation has been manifestly inadequate for decades, arguing against improvement based on no increase in footprint is absurd, and to embed this in any form of policy is overly restrictive and unwise. A much smarter policy standpoint would be to have an objective to 'minimise footprint' as this would provide the current and future Council with more flexibility to manage infrastructure investment and to make it truly fit for purpose.
- Governments often need to develop policies that balance several competing objectives. In the case of this policy, we strongly urge the Council to support facility developments that are designed to suit and fulfil their purpose above any other criteria. Facilities that are designed to a high quality and which are accessible to as many user groups as possible are obvious sub-sets of this objective.

2. Specific feedback on the Principles

- **Principle 1 Balance a minimal infrastructure footprint and scale with fit for purpose facilities required to support local community sport.**

There are 3 Performance criteria, and we **strongly agree** with each of them.

We would like to emphasise that a 'fit-for-purpose' facility needs to ensure adequate facilities for the variety and scale of activities at a given location. For example, the facility we use, and need must cater for male/female sport, junior/senior sport, multiple codes eg cricket, football, soccer, netball, ultimate frisbee. This includes ensuring change room requirements of peak bodies, umpires/officials, trainers/first aid, a myriad of storage, meeting rooms and sufficient space to provide a safe, secure social space for spectators, parents/grandparents, and the general community.

In this light, "non-sporting activities may be a secondary use" of facilities, does allow organisations and clubs to support themselves through secondary uses and sharing of facilities.

- **Principle 2 – Deliver community buildings that perform their purpose while prioritising no net loss of Park Lands.**

There are 3 Performance criteria, and we **strongly agree** with each of them.

Replacement of old, unsafe, inadequate buildings is critical, and priority ought to be given to supporting new facilities that are fit for purpose and cater for multiple sports, activities and community user groups. In fact, lessees should be given credit for providing and maintaining facilities that allow community use and greater use of the area.

Ensuring that buildings "service multiple users and uses", must factor in the development and maintenance of things like public and disabled toilets without which an area would be much less of an asset and would not be as well utilised.

In terms of 'footprint' and 'no net loss of parklands', linking common areas with covered outdoor areas to maximise spaces for community gatherings should not be included in 'footprint'.

- **Principle 3 – Maximise sustainable development and environmental performance of community buildings.**

There are 2 Performance criteria, and we **moderately agree** with each of them.

We would like to emphasise that while environmental performance and Green Star ratings are desirable objectives, there is likely to be a trade-off with cost, and community groups cannot be expected to fund this without Council contribution (both capital and operating costs).

We would also like to strongly emphasise that no loss of existing trees is unreasonable, and it would be far better to have an objective where there is a net increase in trees, which would mean an occasional tree could be replaced with multiple new trees.

- **Principle 4 – Create high quality welcoming and accessible facilities to maximise community use.**

There are 2 Performance criteria, and we **strongly disagree** with each of them.

It is naive to think that single level buildings could be built that are 'fit for purpose' AND result in no net loss of parklands. Smart, well-designed two-story buildings are an obvious solution to managing building footprint while still providing facilities that are 'fit for purpose'.

In addition, in certain circumstances where on-street parking is both limited (eg clearways) and dangerous given the amount of traffic (eg Goodwood Rd), reasonable car parking should be supported. Such car parking can be on permeable surfaces and is not difficult to design and manage in a way that protects the parklands. This is by far a better outcome when compared to the very real risk of death and injury when parklands are situated adjacent to main thoroughfares.

We assume that 'access for all' includes Council support for shelter and shade amenities including seating, handwashing facilities, drinking fountains, toilets etc.

- **Principle 5 – Support diverse participation through equitable co-funding.**

There is only 1 Performance criterion, and we **strongly agree** with it, as co-funding ensures that all parties are invested and motivated.

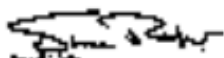
CONCLUSION

The Draft Parklands and Community Buildings (Sport and Recreation) Policy, together with the feedback provided above, would allow the Council to achieve many of the community and social goals it has.

Our feedback above is yet another contribution from ALSC on this topic, and given the delays, backflips and poor strategic thinking of multiple Councils and Councillors in recent years, we are skeptical as to how this will be accepted and acted upon.

As an organisation that invests considerable funds of its own, and substantial volunteer hours to attract and supports thousands of parklands users each year, we continue to feel ignored, rejected, and undervalued, rather than encouraged.

Yours sincerely



Simon Rodger
Chair, Adelaide Lutheran Sports Club
Park 21W, Adelaide



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27 November 2023

Community Consultation
Park Lands Community Buildings
GPO Box 2252
Adelaide SA 5001

Community Consultation – Park Lands Community Buildings

Re: *Draft Community Buildings (Sport and Recreation) Policy*

On behalf of Adelaide University Sport and Fitness (AUSF) thank you for the opportunity to provide input into this policy and the underpinning guiding principles and related performance criteria.

Enjoying the ongoing use of the parklands is such a critical element of overall wellbeing for individuals and community and sporting groups including our Adelaide University Clubs.

AUSF was established in 1896 and although administratively autonomous, we are directly affiliated with the University of Adelaide and have been incorporated since 1979. AUSF helps students and the wider community access an extensive range of sporting facilities both on and off campus through an eclectic mix of almost 40 sporting clubs and three on campus gyms.

AUSF provides overall in principal support for the policy and the opportunities outlined in the discussion paper and I have provided some specific comment below, firstly in relation to the *Draft Community Buildings (Sport and Recreation) Policy* followed by comments in relation to the Summary Report of Discussion Paper, *Investing in Community Infrastructure – Sports and Recreation*.

Draft Community Buildings (Sport and Recreation) Policy

Principle 1 – Performance Criteria 1.2

AUSF is seeking to understand the definition of 'elite competition', specifically to understand if this excludes the State League soccer competitions for both men and women, namely the National Premier League (NPL) and the Women's National Premier League (WNPL) as well as SA's Premier Grade Cricket.

Principle 2 – Performance Criteria 2.1, 2.2 and 2.3

On reading these principles our assumption is that ‘fit for purpose’ requirements will adhere to relevant State Sporting Organisations (SSOs) facility guidelines. We note that multi-functional space designs will be incorporated, it is important to note that some SSO requirements outline that designated separate areas exist for meetings and functions etc.

AUSF strongly supports criteria 2.2 with respect to engagement with multiple stakeholders to ensure the use of buildings and space by more than one organisation.

Principle 4 – Performance Criteria 4.1 and 4.2

This is an important element of the draft policy. The heritage nature of the facilities in the parkland and recognition that these were built during times where the broader needs of our diverse community were not considered.

Principle 5 – Performance Criteria 5.1

AUSF is very supportive of this principle, particularly the co-funding model however seeks clarity in relation to whether this approach would be in place of current lease requirements with regards to funding.

Summary Report of Discussion Paper

Investing in Community Infrastructure – Sports and Recreation

Appendix B – Draft Renewal Priorities

AUSF is interested to further explore overall access to the green space reference throughout the priority table due to the growing needs of facilitating University Sport and Recreation in the CBD and surrounding areas and would welcome the opportunity to discuss how we can further support the investments outlined as well as future opportunities.

AUSF has particular interest in the following park renewal priorities that present an alignment with [AUSF's Strategic Plan](#) and partnership opportunities as we embark a period of growth of University sport (organised and unstructured recreation) in the CBD area:

- **Park 6**
AUSF can also provide partnership opportunities given the alignment with sports represented by AU Clubs, particularly with Wilderness and Blackfriars and welcomes further discussion.
- **Park 21**
AUSF recognises the potential proposed and expresses interest to be involved in the development of opportunities presented, particularly to champion women's sport.
- **Park 22**
AUSF supports our growing AU Netball Club and provides an additional partnership opportunity to explore.
- **Park 17**
AUSF supports our growing AU Touch Football Club and provides an additional partnership opportunity to explore.
- **Park 20**
AUSF supports our growing AU Athletics Club and provides an additional partnership opportunity to explore.

Whilst there are facility usage and access benefits to AU Clubs from any future partnerships AUSF explores, these partnerships would more importantly present a platform to enable Adelaide University sports club students and members to engage with other communities to provide opportunities for rich community engagement, service and experiences.

I look forward to discussing this important strategy further and please reach out should any clarification or further information be required.

A handwritten signature in black ink, appearing to read 'mtwilson', written in a cursive style.

Michelle Wilson

Chief Executive Officer

Adelaide University Sport and Fitness



Pembroke

27 November 2023

City of Adelaide
City Culture Program
GPO Box 2252
ADELAIDE SA 5001

Attention: Ray Scheuboeck

Dear Ray

Submission - Draft Park Lands Community Buildings (Sport and Recreation) Policy

As you are aware Pembroke School Incorporated has, for some time, been in discussions with the Council about the potential upgrade of buildings within Park 17 which are used for sporting and recreational purposes by Pembroke and its Old Scholars associations.

We thank you for bringing to the School's attention the Council's Draft Park Lands Community Buildings (Sport and Recreation) Policy (**draft policy**). The School has now had a chance to consider the draft policy and wishes to provide these brief submissions in response to it. For completeness, the "Your Say Adelaide" survey has also been completed by the School.

In summary:

1. The School agrees with and endorses the development of fit for purpose sporting buildings and facilities within the Park Lands which promote accessibility and inclusiveness.
2. The School considers that the prioritising of no net loss of the Park Lands is unduly restrictive and may limit the ability to provide functional and accessible buildings which include the necessary 'Core Elements'. The requirement that buildings be fit for purpose should be paramount.
3. Given the checks and balances that presently exist in the system, the role of lessees in the design and delivery of projects should not be diminished where the lessee has the capacity to perform those functions.

Intention behind draft policy and principles

Firstly, the School recognises the importance of the Park Lands in providing high-quality and conveniently located open spaces for sport and recreational activities for the community. The School agrees that a number of Park Lands buildings and facilities would benefit from substantial upgrades or replacement. In particular, the School would like to see the development of facilities which promote accessibility and inclusiveness for the benefit of members of both the School's associations and the community more broadly.

The School makes the following more specific comments about the proposed Principles and Performance Criteria:

1. Considering the definition of "Sports Facility Hierarchy" and the different categories it involves (State, Regional, District and Local), it may be more appropriate for infrastructure to seek to support community sport at a local or district level, as opposed to just a local level (Principle 1; Performance Criteria 1.2, 1.3).

2. The requirement for spectator facilities to be temporary in nature is unclear, particularly where the Performance Criteria envisages secondary uses of buildings/facilities and encourages facilities which provide shelter, shade and amenities for community use (Performance Criteria 1.2, 4.1).
3. The performance criteria under Principle 2 should encourage the use of the Parklands and facilities during extended hours, i.e. through investment in lighting.
4. The requirement for buildings to use "materials and colours that blend with the natural surroundings" may be better expressed as "materials and colours that blend with the Park Lands setting".
5. "Building Floor Area" may be more appropriately defined so as to only include spaces which are enclosed on 3 or more sides.
6. It is not entirely clear what "an amenity" (as referred to in the "Core Elements") comprises and whether it is synonymous with "change rooms" or not.

Existing building footprints are too restrictive

The School is concerned that the prioritising of no net loss of Park Lands under Principle 2 of the Draft Policy is too restrictive. Performance Criteria 2.1 of the draft policy currently provides that:

Performance Criteria 2.1 – Planning of new community buildings will include City of Adelaide identifying the removal of one or more existing buildings and/or equivalent hard stand areas.

A new community building will be considered where the City of Adelaide can demonstrate that the footprint will not exceed the fit for purpose requirements of the local level provision and minimise the loss of Park Lands.

It is assumed that the "fit for purpose requirements" are the "Core Elements" as set out in the Glossary of the draft policy.

The School wholeheartedly agrees with the upgrading of facilities, particularly to provide for gender diversity and inclusiveness in sport. Provision of the Core Elements to an appropriate standard will necessarily involve building footprints which are larger than those existing. The School is concerned that the present drafting of Principle 2 is unclear and arguably places too much weight on minimising the loss of Park Lands. The requirement that buildings be fit for purpose should be paramount.

Project delivery

In addition to considering the draft policy the School has also had regard to the Summary Report of the Discussion Paper titled "Investing in Community Infrastructure – Sports and Recreation" dated November 2022 and, in particular, Appendix A of that report which demonstrates the process for delivery of sports infrastructure within the Park Lands.

It is clear that the Council are considering a significant change in the process for project delivery of community sports infrastructure from one which is largely lessee initiated and lead to one which is, nearly entirely, controlled by the Council administration. The School has concerns that:

- this has the potential to compromise how efficiently and economically new buildings can be planned and constructed;
- this may result in buildings which are not well suited to the Lessees' needs and objectives which, in turn, leads to lowered use and activation of the Park Lands;

- the level of control which existing Lessee would have in the delivery of projects is disproportional to the minimum co-funding contribution expected under the draft policy; and
- a Council led process does not incentive the replacement or upgrading of sporting buildings as encouraged under the draft policy.

It appears that a major driver for this change in process is to increase the number of buildings which cater for multiple sports and multiple users. While the School generally understands and supports this, there is a legitimate risk that the new process may result in sports buildings which, while able to be shared, are not well suited to the needs of a particular lessee. It is also not clear how the shared use of facilities would be managed and/or policed on an ongoing basis and the School has concerns about the different standards which may be expected or upheld by users and how this may impact on the lessee's ability to maintain the sports facilities in accordance the proposed maintenance plans.

The School considers there is a risk that the new process will disincentivise lessee investment and/or result in lowered use of the buildings which, in turn, lessens the activation of the Park Lands.

Given the checks and balances that exist in the system, the role of lessees in the design and delivery of projects should not be diminished where the lessee has the capacity to perform those functions. While the School appreciates the importance of community and stakeholder engagement it considers these steps could be built into, or reinforced and incentivised within, the existing process.

The School is happy to discuss these comments further if that would be of assistance to the Council.

Yours sincerely

A handwritten signature in black ink, appearing to read 'MR Staker', written in a cursive style.

Mark Staker
Principal



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Urban Development Institute of Australia
(South Australia) Inc.
Level 1, 26 Flinders Street
Adelaide SA 5000

23 November 2023

Community Consultation
Park Lands Community Buildings

Via email: yoursay@cityofadelaide.com.au

Dear Community Consultation Team,

Park Lands Community Buildings

Thank you for the opportunity to comment on the Draft Park Lands Community Buildings (Sport and Recreation) Policy (the Draft Policy).

The Urban Development Institute of Australia (UDIA) has been active in South Australia since 1971. Many imminently qualified members of the UDIA are involved through policy development on committees, professional development, event attendance as well as other activities, all aimed at improving the outcomes for the development sector and State. It is through these members that the UDIA provides an important voice on development matters, particularly in relation to initiatives for homebuyers, urban developers, professionals and others who are involved in the sector. More broadly, the UDIA is an advocate for effective growth planning and liveability in all areas of the State.

The UDIA recognises the important part the city centre will play in the development of Adelaide in the coming decades. At present, the State Government is undertaking a review of the Greater Adelaide Regional Plan which will result in a 30-year plan to guide the development of Greater Adelaide. Concurrently, Infrastructure South Australia is undertaking a review of the 20-year State Infrastructure Strategy, and the City of Adelaide is consulting on the development of the *Our Adelaide. Our Future. City Plan – Adelaide 2036*. These reviews and plans are being made at a time when the State Government has also signed up to the Federal Government's housing targets which will require South Australia to deliver over 16,000 new homes each year from 1 July 2024.

All of these documents and plans assume a key role for the city of Adelaide in supporting a greater population whilst maintaining a central role in the state's economy. The UDIA supports the vision for growing the population of the city of Adelaide. The ambitious population targets set in State Government and Council strategic planning documents can only be achieved with the development of sites and projects in locations and precincts across the city centre that will deliver greater population density. The Park Lands will play a vital role in supporting the desired population growth in the City of Adelaide.

The *Investing in Community Infrastructure – Sports and Recreation: Discussion Paper* notes the outstanding return on investment in social terms from investment in running sporting clubs. The La Trobe University study found:

“for every \$1 spent to run a football club, there was at least \$4.40 return in social value in terms of increased social connectedness, wellbeing, and mental health status; employment outcomes; personal development; physical health; civic pride and support of other community groups.”

This underpins the importance of investment in sports facilities and the community clubs and associations that use them.

The City needs community and sporting facilities that will reflect the needs of the diverse local communities. As such, a key consideration should be the recognition of the changing nature of community sport. One example would be the continuing and welcome increases in female participation and the consideration that needs to be given to how this impacts on the facilities needed in the future. It is notable that the draft policy does not address women’s sport in any detail.

Population growth within the city centre will provide both an opportunity and a subsequent necessity to reimagine the Park Lands. This can see them elevated to a diverse collection of well-planned, connected and highly utilised spaces that provide broad benefits to local residents and communities as well as visitors to the City.

Principles that should be supported and encouraged within Council policy include linking indoor areas with outdoor covered areas and access to public amenities, such as public toilets, which can allow for wider and unstructured use by the community. These factors can support greater liveability for local residents and communities and should be factors supported and promoted in policy. These considerations can provide amenity and an environment that is a drawcard for people. Developments that will bring more people to the city centre will provide an economic foundation for further investment in the Park Lands.

In summary, the benefits that will flow from a vision of the Park Lands existing as a hub of active recreation are significant. Fundamentally, groups with facilities in the Park Lands need more support and a broadly permissive attitude towards initiatives that will encourage greater participation, utilisation and maintenance of the Park Lands. Council can work closely with the clubs and community groups that represent a large section of its community to support the achievement of many of the goals within its own, and the State Government’s, strategic documents.

Thank you once again for the opportunity to comment on the Draft Policy. Through direct engagement with our members, we have reviewed the Draft Policy leading to the above observations. We would also be pleased to meet with you to provide further information if required.

Yours sincerely



Liam Golding
Chief Executive

Torrens Rowing Club

Response to Draft Park Lands Community Buildings (Sport and Recreation) Policy

November 2023

To what extent do you agree/disagree with Performance Criteria 1.1, 1.2 and 1.3 of the Draft Policy relating to fit for purpose facilities to support local community sport?

Principle 1 – Balance a minimal infrastructure footprint and scale with fit for purpose facilities required to support local community sport.

Performance Criteria 1.1 – Community buildings will service outdoor community sport and recreation.

- Community buildings will only be considered in the Park Lands where they are required to support outdoor sport and recreation.

Performance Criteria 1.2 – Must be for community sport participation, excluding elite competition. Non-sporting activities may be a secondary use.

- Community sporting spectator facilities secondary to day-to-day use must be temporary.
- Minimise hard surface surrounds, utilising permeable surfaces.
- Enhance irrigated turf surfaces to increase carry capacity.

Performance Criteria 1.3 – New community buildings will not exceed the ‘core’ elements of local level provision.

- Council will plan for and support the provision of community infrastructure in the Park Lands that is fit for purpose at a local level within a sports facility hierarchy.

TRC response:

We largely agree with Principle 1 however we have some comments on the criteria 1.2 and 1.3.

Performance Criteria 1.2:

We have some concern that spectators are not accommodated. For non-active sport participants, their recreational activities are often as spectators. We often find that spectators are then drawn to trying out the sport themselves. We note our largest cohort of new members are people who have been drawn to the sport by informal spectator activities. At the Torrens Clubhouse, it is essential for junior rowing to incorporate areas where parents can participate as spectators and then be drawn to volunteering in the sport.

Performance Criteria 1.3

This is obscure. What are the ‘core’ elements of local level provision; what is “a sports facility hierarchy”?

To what extent do you agree/disagree with Performance Criteria 2.1, 2.2 and 2.3 of the Draft Policy relating to prioritising no net loss of Park Lands?

Principle 2 – Deliver community buildings that perform their purpose while prioritising no net loss of Park Lands.

Performance Criteria 2.1 – Planning of new community buildings will include City of Adelaide identifying the removal of one or more existing buildings and/or equivalent hard stand areas.

- A new community building will be considered where the City of Adelaide can demonstrate that the footprint will not exceed the fit for purpose requirements of the local level provision and minimise the loss of Park Lands.

Performance Criteria 2.2 – Community buildings will service multiple users and uses.

- The planning of new community buildings will involve engagement with multiple stakeholders to facilitate use by more than one community organisation.

Performance Criteria 2.3 – Community buildings will incorporate design features to reduce scale and visual impact through compact layouts, multi-functional spaces, efficient circulation, shared facilities and low scale integrated design.

- Compact Layout – Create a compact building layout that maximises usable floor space while minimising overall footprint. Avoid unnecessary elements that increase the building's size without adding significant functionality. Link internal common areas to covered outdoor areas to maximise 'sheltered' community spaces for community gatherings.
- Multi-Functional Spaces – Design spaces that serve multiple purposes to reduce the need for separate rooms or areas. Incorporate movable partitions, modular furniture, and adaptable layouts to accommodate different needs and group sizes.
- Efficient Circulation – Plan for efficient circulation patterns within buildings to minimise corridor areas and wasted space.
- Shared Facilities – Provide shared facilities and common areas for multiple users.
- Low Scale Integrated Design – Ensure new buildings are fit for their Park Lands setting and are visually discrete. Design buildings minimal scale to complement the Park Lands context, using materials and colours that blend with the natural surroundings

TRC response:

In general, TRC agrees with this Principle

Performance Criterion 2.1 is however confusing. The criterion talks about reduction of the number of community buildings if a new building is planned; the dot point talks about the limits of footprint of any new building but nothing about building removal. These are not necessarily complementary aims.

There has already been a 20% reduction in formal sporting areas in the Park Lands over the last 30 or 40 years (*Investing in Community Infrastructure - Sports and Recreation*). Further reductions and proposals for infrastructure to only fit within existing footprints are making it extremely difficult for development and encouragement of sport. The population of Adelaide is increasing and therefore the pressures on existing infrastructure will only increase. We would prefer a principle that incorporated recognition that in order to provide sporting and recreational facilities for a growing city (and to improve the health of those residents) there must be consideration of increases in sporting areas. Increased building footprints aren't necessarily needed for increased areas.

The current Torrens Rowing Clubhouse is fit for its designed purpose of operating a boat club using the rowing boats stored on the premises. The clubhouse size is adequate for the size of the membership. Presently the only consideration for renewal is in renovation and equipment upgrades as we do have severe financial constraints as we receive no allowance from council as part of our lease arrangements. This is difficult for a not-for-profit organisation run by volunteers. We try to keep membership fees reasonable so that they don't deter users from joining or continuing membership. We are dependent on fund-raising and grants to upkeep facilities and equipment and to cover overheads.

However multiple stakeholders is problematic. If you don't have clearly defined ownership (via a lease) of infrastructure, the well documented significant risk is that multiple users do not feel the same responsibility to care for and maintain the facility. (Someone else can do it.) The incentive is to free-ride. Our club has put many volunteer hours into maintenance and development of a facility without any expectation of return on this investment from the owner apart from continued use by the Club - the facility then benefits first the members and then the wider community.

Although we are notionally a single sport community, we do have outreach to other community groups, and given the proposals of this policy, we intend to expand on what we already have in place. We have shared our space and facilities with school rowing programs and we have opened up membership to gym members. More far-reaching is that we have provided our space to dance groups and art classes, the Adelaide Festival Centre (as overflow rehearsal space), and as a fringe venue. We also have corporate and community Learn to Row programs.

Performance Criterion 2.3 is directed at new buildings and we agree with its intent.

Many of the desirable design features mentioned in the criterion already apply to our location. We don't have green playing fields but rather the Torrens lake is our field of play. The clubhouse has an agreeable architectural style within the context of the waterfront and the amenity that the lake provides to the public, businesses, other sporting and arts facilities.

We believe it enhances the tourism, cultural and community aspects of this precinct.

It also adds great value to the community participating in terms of physical and mental health, being part of a community and the social value, it provides.

To what extent do you agree/disagree with Performance Criteria 3.1 and 3.2 of the Draft Policy relating to sustainable development?

Principle 3 – Maximise sustainable development and environmental performance of community buildings.

Performance Criteria 3.1 – Site community buildings to maximise efficiency and environmental performance.

- Site selection will be informed by a comprehensive site analysis with no loss of existing trees.
- The topography of the selected site will be utilised for sustainable water management.
- Consider modular buildings to minimise site disturbance.

Recommendation 4- Item 7.4 - Attachment C
Performance Criteria 3.2 – Achieve a 3 Star Green Star (or equivalent) certification for all new community buildings.

Key design features of community buildings in the Park Lands may include:

- green roofs to reduce building heat absorption and promote biodiversity
- locally indigenous plantings within the buildings' surroundings to support biodiversity and wildlife habitat
- maximising the use of natural light and ventilation to reduce the need for artificial lighting and heating, ventilation air conditioning (HVAC) systems
- use of sustainable materials and renewable energy sources to reduce environmental impact

TRC response

As per criteria 2.1, 2.2 and 2.3 as an established building these criteria are less applicable to us. We have endeavoured to upgrade where possible to meet environmental issues such as installing solar panels. The concept of more sustainable roofing is appealing.

To what extent do you agree/disagree with Performance Criteria 4.1 and 4.2 of the Draft Policy relating to welcoming and accessible facilities?

Principle 4 – Create high quality welcoming and accessible facilities to maximise community use.

Performance Criteria 4.1 – Community buildings will be designed to be accessible for all.

- Prioritise single level buildings for optimal accessibility and use, incorporating universal design principles to create a welcoming environment for everyone.
- Provide generous shelter and shade and amenities including seating, handwashing facilities, drinking fountains, kiosks, and toilets.

Performance Criteria 4.2 – Community buildings will be accessible via path networks and on-street parking.

- Link community buildings and associated sports facilities to public transport and cycling and walking networks to encourage sustainable transport options.
- Car parking will not be permitted on the Park Lands, with the exception of loading and unloading, drop off and pick up, and disability parking.
- Implement indented parking measures to optimise visitor safety along roadways.
- Avoid the addition of access roadways. If unavoidable, use permeable surfaces

TRC response

We agree with these criteria subject to the geographic constraints. We are well placed for public transport. We agree with minimising car access to the parklands. We do provide accessible facilities as far as we are able within the building and we have gender inclusive bathrooms. We would like to see wheelchair accessible pathways to the water's edge which don't currently exist. And we are a vibrant part of the small Kirrawirra community comprising rowing clubs, a coffee shop and a restaurant.

Low scale integrated design should not mean just single level buildings, but well designed building to deliver the objectives. The Clubhouse has an extremely efficient layout with a gym and storage for boats on the bottom level; and a shaded spectator balcony and function centre with kitchen,

bathroom and storage facilities on the upper level. It is a smaller scale building but is efficiently designed to maximise the space.

Similar approaches should be considered in the parklands to have a smaller footprint and to allow for spectators and supervision of young athletes at higher levels, and a fundraising component to maintain the sporting clubs using those facilities.

To what extent do you agree/disagree with Performance Criteria 5.1 of the Draft Policy relating to equitable co-funding?

Principle 5 – Support diverse participation through equitable co-funding.

Performance Criteria 5.1 – Provide transparent and equitable co-funding of community buildings and associated facilities. Council will co-fund projects that meet the following eligibility criteria

Project Co-funding Criteria

- Project brief co-designed with Council
- Consistent with the Adelaide Park Lands Management Strategy
- Delivers core elements of local level provision and focuses on community participation in outdoor sport and recreation
- Results in increased accessibility, inclusion and/or utilisation of community facilities within and outside training and competition times
- Results in upgrading or creating an asset that is owned and managed (through a lease or licence) by Council
- Benefits more than one user group or organisation
- Complies with the principles contained in this policy
- Incorporated in Council's Long Term Financial Plan

TRC response

These are admirable criteria, provided they do not limit participation by imposing unreasonable demands. An example is Adelaide VolleyBall Club which has been offered a new site and facilities but at a cost of \$7m. A large co-funding burden on a community club might reduce its viability and attraction.

As an established facility:

- we do have a focus on community participation.
- we provide accessible facilities (entry ramp, toilet)
- provide benefit to more than just us as a user-group
- provide and encourage community participation in outdoor sport and recreation

Do you have any additional feedback you would like to provide on the Draft Policy?

TRC response

We are strongly supportive of a parklands community buildings policy whereby preservation of the parklands, without further encroachment, is emphasised. In addition, the environmental concerns inherent are valid.

As we are located on the river some aspects of the draft policy are less relevant, but we largely support the factors, not so applicable to us, such as irrigated turf surfaces to increase carry capacity for example.

We do believe that our clubhouse has significant historical and cultural value to the parklands, and the Torrens precinct, and believe at all cost it should be preserved. The visual amenity is of great value. The amenity it provides to many for health and social value are significant.

The concept of sharing facilities is understandable for minimising space for building facilities in the Parklands whilst providing sports and social access to a wider community. The risk from incompatible sharing is the loss of identity of our club (and others) which supports tradition and pride in what we maintain. Increasingly we are making our facilities available to others on a casual basis: with a compatible mix, the advantages are mutual as we open us to a wider community.

We would like taken into account recent research in regard to sport and participation and hope that implementation of any policy would not further impact the stresses already placed on community sporting organisations.

Source: Australian Sports Foundation Research.

Grassroots sport is severely underfunded and reliant on a dwindling supply of volunteers.

Barriers to playing sport include the cost: an average of \$1,100 per annum per person for membership in addition to equipment and uniforms.

Source: Australian Sports Foundation Research.

The Australian Sports Foundation's "Your Sport Your Say" research involved almost 3,000 community sporting clubs across Australia and it has uncovered some worrying trends. Rising costs and falling revenue are pushing almost one in five (18%) community sporting clubs to the brink of collapse.

More than one in four (27%) clubs are also reporting a decline in registrations among 15-19 year-olds, which could have future implications for the health of the nation and Australia's proud record as a highly successful sporting nation.

Almost two in three clubs (63%) highlighted their main challenge in the last 12 months was not having enough volunteers.

Against a backdrop of rising inflation, the Clubs Under Pressure report shows that 52% of clubs surveyed report cost of living impacts as a growing barrier to member registrations and more than two in three (68%) have experienced increased running costs, which is a substantial increase from 47% in 2021. For these clubs, running costs have increased on average by \$20,529 and 28% reported a decrease in their financial reserves in the last 12 months, with an average of a \$30,891 drop in cash reserves among this group.



Adelaide Park Lands Association

c/o Affinity Business Advisers
Level 1, 458 Morphett Street
Adelaide SA 5000
secretary@adelaide-parklands.asn.au

ABN 19 706 384 386

Submission Draft Park Lands Community Buildings (Sport and Recreation) Policy

<https://yoursay.cityofadelaide.com.au/park-lands-community-buildings>

OPEN, GREEN PUBLIC?

The Objectives of the Adelaide Park Lands Association (“APA”) specified in the Association’s Constitution, relevantly include “to ensure that:

- “i) the Park Lands are reserved as a place for public recreation, leisure and enjoyment;
- “ii) the public, so far as practicable, has free and unrestricted access to and use of the Park Lands;
- “iii) the Park Lands are preserved and maintained to give priority to biodiversity, including gardens, grassland, water, wetlands, trees and other vegetation rather than buildings, fences or artificial surfaces;
- “iv) alienated areas of the Park Lands are restored to Park Lands
- “v) the open space character of the Park Lands as a place dividing the City of Adelaide from the suburbs is preserved;
- “vi) the Park Lands are preserved and maintained in a manner that enhances their special place in the design of the City of Adelaide;
- “vii) the amenity of the Park Lands is not impaired by inappropriate development on Park Lands.”

APA simplifies and portrays the general thrust of these Objectives with the slogan “Open, Green, Public” and the diagram that appears on the last page of this submission.

It follows, therefore that the Association supports any new or amended legislation or policy that would advance these Objectives. Conversely, of course, APA would be critical of moves to hinder or thwart these Objectives.

The *Draft Park Lands Community Buildings (Sport and Recreation) Policy* (“the Draft Policy”) contains five principles, none of which advance these Objectives. Rather, when read together, the principles in the Draft Policy would tend to thwart or hinder some of these APA Objectives, (e.g. Objectives ii, iii, and vii).

Principle 1

Neither Draft Principle 1, nor any of its three draft Performance criteria suggests any limit on the extent to which the demands of “local community sport” would allow more and more of Open Green Public Park Lands to be lost under a proliferation of new “community sport” buildings. The principle is entirely concerned with the demands of community sport, without recognising the public interest in “free and unrestricted access to and use of the Park Lands”.

Principle 2

This Draft Principle suggests that delivering new community buildings should “prioritise”...“no net loss of Park Lands.” However it stops short of insisting on “no net loss” and fails to even suggest the possibility of restoring any public Park Lands previously lost to buildings. As drafted, this principle is not consistent with APA’s Objective (iv).

- Performance criteria 2.1 and 2.3 both fall short of requiring “no net loss”. Requiring “design features to reduce scale” begs the question: “reduced from what?” Criteria 2.1 suggests further loss of Park Lands should be “minimised” rather than prohibited.
- Performance criteria 2.2 envisages “engagement” with multiple stakeholders but falls short of prescribing that new buildings **MUST** be shared-use.

Principle 3

The suggested design features of proposed new buildings may be supported but are not directly relevant to any of APA’s Objectives.

Principle 4

Likewise, this principle is concerned with the design of buildings, rather than the separate matter of quantity, size, operation and control of buildings. Any building “*designed* to be accessible to all” may be easily rendered inaccessible by a lessee who is permitted to keep gates and doors locked, to exclude the public.

Principle 5

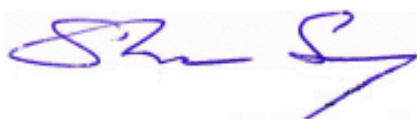
The proposed project co-funding criteria contain no reference to the public interest in “free and unrestricted access to and use of the Park Lands”. The reference to “benefits more than one user group or organisation” is welcome but the principle falls short of requiring any part of any proposed new facility to allow public use.

RECOMMENDATIONS:

APA suggests revising these principles to include or incorporate the following principles and complementary performance criteria:

- New sports buildings will be permitted only when development of the proposed new facility:
 - would be accompanied by demolition of old buildings to effect a net **increase** in Park Lands accessible to the public;
 - would be available to multiple sports organisations;
- Co-funding will be offered only when, and to the extent that public access is allowed and maintained during the entire term of any lease. (e.g. if only 25% of the building floor area is available to the public then Council’s contribution will not exceed 25%).

Shane Sody, President



25 November 2023

About the Adelaide Park Lands Association

Our Association was founded in 1987 as a non-profit community based organisation - a 'watchdog' to guard Adelaide's greatest treasure: the world-unique, National Heritage-listed Adelaide Park Lands.

But we are much more than a watchdog. We offer a focal point for South Australians to explore, be inspired by, protect and restore the Open Green Public spaces that are matched nowhere else in the world.

Our support comes from a broad cross-section of the South Australian community, across the political spectrum - people who Love Your Park Lands, as Open, Green, Public spaces.

On 25 November 2023, our newsletter subscription list contained 3,909 active subscribers.

Our following on Facebook was 5,429, and on Instagram 1,470. Our list of full (paid-up) members contained 560 names.

These numbers do not include sponsors, donors and subscribers to separate feeds for our Adelaide Park Lands Art Prize competition.

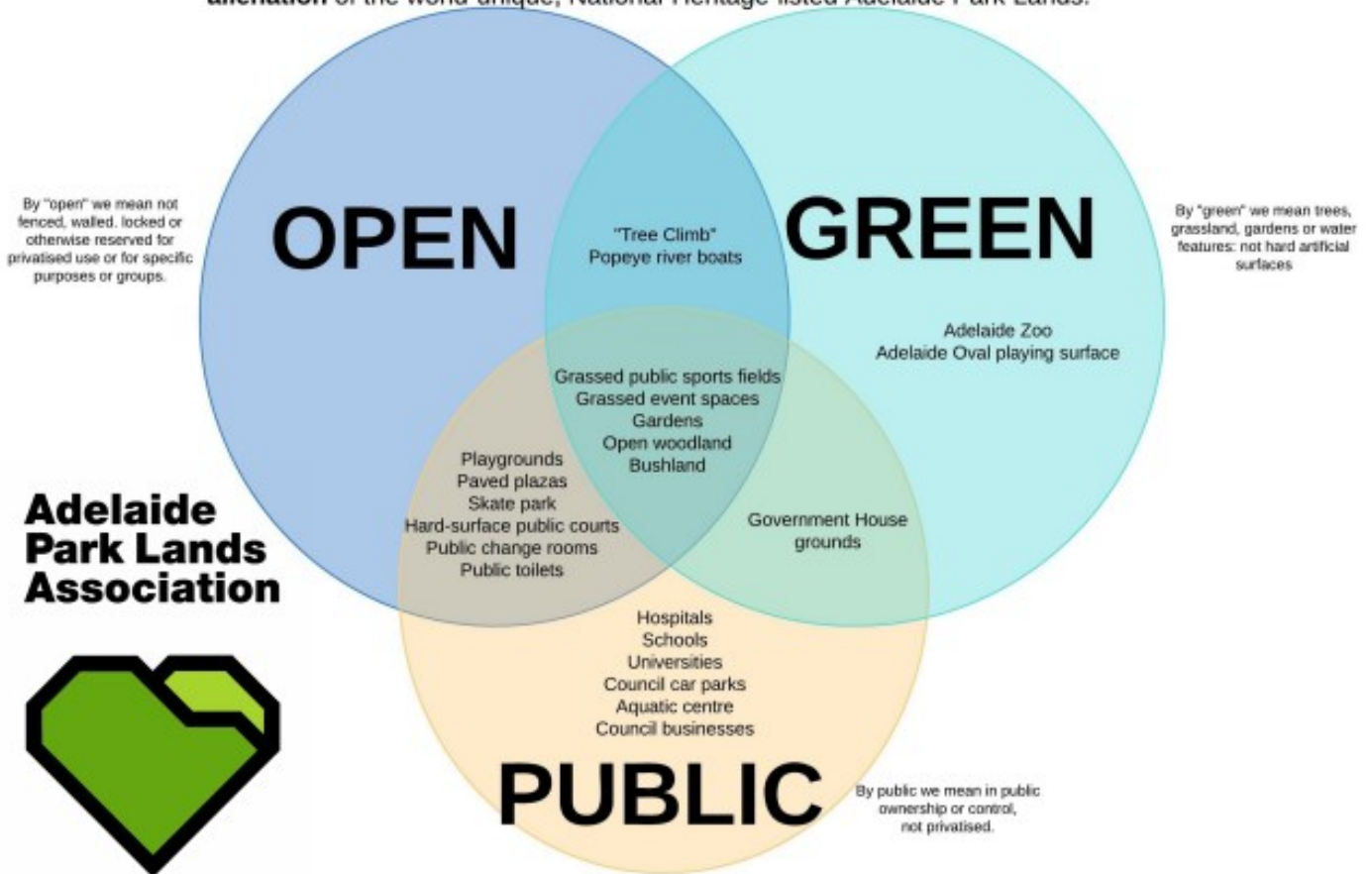
We "Explore, Inspire, Protect, Restore"
www.adelaide-parklands.asn.au/what-we-do



We simplify our Constitutional Objectives with this diagram:

PARK LANDS ARE OPEN, GREEN, PUBLIC (at least 2 out of 3)

If a proposed building or other permanent land use can't fit into at least two of these overlapping circles, then it's an **alienation** of the world-unique, National-Heritage-listed Adelaide Park Lands.





COMMITTEE FOR
ADELAIDE

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committeeforadelaide.org.au

24 November 2023

City of Adelaide
Community Consultation
Park Lands Community Buildings
GPO Box 2252, Adelaide SA 5001

RE: Draft Park Lands Community Buildings Consultation

Sent via: yoursay@cityofadelaide.com.au

To the City of Adelaide,

On behalf of the Committee for Adelaide, I write in support of the *Draft Park Lands Community Buildings (Sport and Recreation) Policy*, currently open for public consultation.

The Committee for Adelaide is an independent, non-partisan and sector agnostic organisation that brings together businesses, industry bodies, community, and government to help shape the future of Adelaide. A key part of our work is helping to facilitate change, spark discussion and generate positive outcomes for the benefit of our State, both now and into the future.

The Committee for Adelaide notes that the *Draft Park Lands Community Buildings Policy* is intended to guide the renewal of community buildings and associated infrastructure in the Adelaide Park Lands to support:

- use of and access to the Park Lands through participation in community sport and recreation
- protecting and promoting the Park Lands
- mitigating the effects of climate change and ensuring integrated and sustainable development.

It will also inform the City of Adelaide's approach to investing in City of Adelaide owned community buildings and associated infrastructure that are (or proposed to be) leased and licensed to external community organisations.

In considering the *Draft Park Lands Community Buildings Policy*, it is useful to reflect on some of the key findings of the Committee for Adelaide's inaugural [Benchmarking Adelaide Report](#), recently released in partnership with JLL, the RAA, Deloitte and Hames Sharley. The report measures Adelaide within a peer group of 20 global cities in areas such as economy, business dynamics, skills, transport, vibrancy, liveability, sustainability, and reputation. Key findings relevant to the Draft Policy include:

- Compared to other cities, Adelaide tends to fare less well for overall amenity, vibrancy and experience when rated on access to public spaces, cultural offer, community participation and social cohesion.
- Other cities are also catching up or even overtaking Adelaide on health and wellbeing, public transport, walkable neighborhoods, and access to green space.
- As the city grows, Adelaide's urban form may impair easy access to services, assets and amenities that gives the city appeal.
- Adelaide ranks low for share of the population living in neighborhoods conducive to physical exercise.
- More energy-efficient and climate-resilient infrastructure is needed to support citizen and investor needs.
- Strategic direction of public-private and multi-sector alliances over a longer term can provide the shared impetus required to achieve critical mass.

Notably, the findings of the report highlight the importance of offering high-quality and easy-access amenities and experiences - for all age groups, backgrounds, and incomes - to enhance the vibrancy of public spaces, boost community participation and encourage social cohesion. The overall vibrancy, amenity and experience of the city also has flow-on implications for many of Adelaide's wider economic ambitions including population growth, talent attraction and improved productivity.

With the strong belief that amenity, vibrancy and experience is intrinsically linked to the economic performance and outcomes of Adelaide, the Committee of Adelaide is broadly supportive of the Draft Park Lands Community Buildings Policy to guide the renewal of existing community buildings and associated infrastructure in the Park Land and facilitate appropriate co-investment funding opportunities and budgeting.

King regards



Sam Dighton
CEO, Committee for Adelaide

From: Matt Schmidt | ACHPER (SA) <m.schmidt@achpersa.com.au>

Sent: Monday, November 27, 2023 5:08 PM

To: YourSay <Y.Adelaide@cityofadelaide.com.au>

Subject: Parklands

Hi there.

I wish to offer feedback on the The Adelaide City Council draft Parklands and Community Buildings (Sport and Recreation) Policy.

Principle 1 Balance a minimal infrastructure footprint and scale with fit for purpose facilities required to support local community sport.

I strongly agree with these 3 Performance criteria, A 'fit-for-purpose' facility needs to ensure adequate facilities for the variety and scale of activities at a given location. An Acsara facility needs to cater for male/female sport, junior/senior sport, multiple codes eg cricket, football, soccer, netball, ultimate frisbee etc. As a result, a fit for purpose facility needs to cater for all of this (including change room and storage requirements of peak bodies), umpires/officials, trainers/first aid, meeting rooms and sufficient space to provide a safe, secure social space for spectators, parents/grandparents, and the general community.

Principle 2 – Deliver community buildings that perform their purpose while prioritising no net loss of Park Lands.

I strongly agree with the 3 Performance criteria, We need to replace our old, unsafe, inadequate building is critical, and that priority ought to be given to supporting new facilities that are fit for purpose and cater for multiple sports, activities and community user groups.

Principle 3 – Maximise sustainable development and environmental performance of community buildings.

I moderately agree with each of them. No loss of existing trees is unreasonable, and it would be far better to have an objective where there is a net increase in trees, which would mean an occasional unregulated tree could be replaced with multiple new trees.

Principle 4 – Create high quality welcoming and accessible facilities to maximise community use.

I strongly disagree with each of these principles..It is naive to think that single level buildings could be built that are 'fit for purpose' AND result in no net loss of parklands. Smart, well-designed two-story buildings are an obvious solution to managing building footprint while still providing facilities that are 'fit for purpose'.

As there are circumstances where on-street parking is both limited (eg clearways) and dangerous given the amount of traffic (eg Goodwood Rd), that reasonable car parking be supported.

Principle 5 – Support diverse participation through equitable co-funding.

I strongly agree with this Performance criterion. The Acsara project meets the co-funding criteria in the draft policy so there is not a lot to comment on here.

I am a member of a club that uses ACSARA leased facilities, the Old Concordians Cricket Club and know our members are strung in these points. We need an improved facility to allow use.

Matt Schmidt

From: Paula Jolly <pjolly@wilderness.com.au>

Sent: Tuesday, November 28, 2023 12:47 PM

To: Ray Scheuboeck <R.Scheuboeck@cityofadelaide.com.au>; Jamie Stefanato <J.Stefanato@cityofadelaide.com.au>

Cc: Carmen Crocker <ccrocker@wilderness.com.au>

Subject: Draft Park Lands Community Buildings (Sport and Recreation) Policy

Importance: High

Dear Jamie & Ray

Thank you for the opportunity to provide feedback on the Draft Park Lands Community Buildings (Sport and Recreation) Policy.

We note the leadership of the Council in seeking to clarify and simplify existing policies and we also note the community challenges in balancing co-investment in such community assets.

As you are aware, Wilderness is an existing partner of the Adelaide City Council, with a long-standing lease arrangement of Park 6 Nantu Wama in excess of 20 years. Wilderness is a non-denominational girl's school educating students from Early Learning Centre through to Year 12 and throughout the years, Park 6 has become an integral resource for the School.

The Parklands are used for educational programs centred around conservation, ecology and sustainable practices, in addition to the School's comprehensive co-curricular sport and physical education program offering a wide range of sports and recreational activities to all age groups and skill levels. Wilderness, together with a number of associated sub-lessees, are committed to year-round use of the Parklands, with participant numbers of approx. 2,500 each year across both weekdays and weekends.

Over the past 3 years (2020, 2021 & 2022), Wilderness has spent on average \$181k per year on maintaining these assets on behalf of the Adelaide City Council ratepayer and broader South Australian taxpayer.

Like many similar organisations, Wilderness faces challenges with ageing and inadequate facilities to meet the needs of the community and meet modern expectations and we have watched with interest the investments and decisions of other parklands users in the modernisation of their assets and the challenges and opportunities.

The current facilities used and maintained by Wilderness are not fit for purpose for contemporary sports for either school or club use. Some of this relates to the quality of the building fabric, but some of it also relates to the nature and extent of facilities provided. We believe any policy needs to continue to consider additional building area – either through footprint, or an additional level - if it is required to provide contemporary facilities. We note this Draft Policy addresses the possibility of indoor and outdoor space.

As part of this consultation, we would also reassert that appropriate lease arrangements – tenure and terms – are required for any organisation such as Wilderness to provide expertise and funding towards a redevelopment. It is our position that any Policy should consider lease and tenure arrangement which provide the certainty needed for co-investment in redevelopment.

We are disappointed that the draft policy does not acknowledge the changing nature of community sport with increased female participation, and we are particularly concerned what impact this has on decision making regarding facilities that meet different needs going forward.

We look forward to continuing to partner with the Adelaide City Council and work collaboratively towards the ongoing renewal of assets for the betterment of the community, including our school community.

Comment: Bridgland, CoA ratepayer, 8 pages

Draft Park Lands Community Buildings (Sport and Recreation) Policy

21 November 2023

This response is informed by two analyses:

1. My long-term study of the city council's approvals for construction or re-construction of sports or recreation buildings, commencing in 2011 and concluding in 2018. It covered (not in chronological order) Parks 9, 10, 20, 24, 25, and 26 (Tennis SA, linked to Park 1) etc). Between 2011 and 2018, theoretical attempts to limit park lands sports pavilion footprint or floor-area expansion proposals, or to avoid creating new or expanded allowances for car parking on park lands, were mostly compromised. These compromises were supported at Adelaide Park Lands Authority board, Adelaide City Council, and Council Assessment Panel stages. The determination by these bodies to compromise was influenced by broad but commonly ambiguous 'action' statements in versions of the *Adelaide Park Lands Management Strategy* (2010 and 2016). Assessors relied heavily on this policy source, as well as the *Community Land Management Plan* and the city council's 2008 architectural reference *Park lands building design guidelines*. However, significant additional influence also came via the arguments of skilled legal and planning advisors contracted by most development applicants. The outcome has seen lessees of each of these parks either achieve their objectives or at least significantly progress policy assessment outcome (as at 2018). For the successful applicants, the result was a gain of exclusive use of areas of the Adelaide park lands, enabling the commercial privatisation of refreshed lease areas, and manifesting in large, new buildings whose purpose now far exceeds the original requirements of the club or association. A feature of this outcome has been that it was often achieved in non-transparent ways, all the while tapping into public funds contributions.
2. My 2023 critique of council's recent draft *Park lands lease and licence policy* (an update to the 2016 version, approved already but not yet publicly consulted). This has relevance in relation to a theme noted below, that is, there is already a concoction of ambiguous policies relating to building expansion or new building proposals in the park lands that do not, and cannot in their current forms, align. For example, the proposed new policy examined in this YourSay consultation would conflict with a proposed revision of the **draft 2023 update to the 2016 Park lands lease and licence policy** – which itself is significantly flawed. There is at the date of this submission no public evidence that council has addressed these alignment flaws.

RESPONSES TO THIS NOVEMBER 2023 YOURSAY 'COMMUNITY BUILDINGS' DRAFT POLICY PROPOSITION

- As a ratepayer, I do not support a proposition that, from this date, the CoA should financially support the construction or replacement of any sports or recreation buildings and/or facilities in the park lands.

- It does not follow that a lapsed lease or a lapsing lease *must* be renewed because a building that is not ‘fit for purpose’ must be enabled to become ‘fit for purpose’ through CoA funding, and it does not follow that an arising bid to construct a replacement building should be accompanied by a demand for a fresh, long-lease period to compensate for a co-contribution by the lessee(s) of sums to get that built form outcome.
- I do not support the construction or replacement of any facilities that result in large new ‘pavilions’. Existing old facilities that are run down should be closed if the lessee claims not to have funds for an immediate upgrade. Not to close them would place the Corporation into a risky legal position; otherwise the council is complicit in allowing the lessee and/or sub-lessee to operate under circumstances where health, safety and welfare and disability access are compromised. (This Corporation is currently allowing this at some park lands sites. It is probable that this would be already contrary to some lease terms.)
- When the lease term nears its end date, as is the case with a number of facilities mentioned in this bid, any building seen to be ‘not fit for purpose’ should, in the absence of full funding by the lessee, be demolished at the lessee’s expense, and the land returned to green, open-space park lands. All adjacent hard-stand facilities, car parks, lighting, reticulation and fencing should be removed and the site returned to park lands open space.

General observations/discussion

- a) This proposed *Draft Park Lands Community Buildings (Sport and Recreation) Policy* in many ways replicates other CoA policy documents relating to buildings in the Adelaide park lands. It seeks to deliver performance criteria, but the criteria are riddled with ambiguity and wide open to multiple interpretations (otherwise know as ‘motherhood statements’). Moreover, it is proposed to operate in a policy matrix already heavily compromised by multiple other conflicting policies.
- b) It is naïve in the extreme to suggest that this draft policy “should be read in conjunction with” multiple other statutory and administrative policies, as if each already delivers a clear and unequivocal content pathway likely to underscore and complement this draft policy. In reality, these existing policies present a mish-mash of conflicting and ambiguous content, which is constantly evolving as each is updated. Put simply, the proposition that another new draft policy will deliver a clear park lands management direction of future building approvals in the park lands is grossly misleading.
- c) If adopted, the chief beneficiaries would be the usual park lands sport and recreation suspects, of whom seven remain waiting in the queue, anticipating generous handouts from the CoA (or state government: viz Park 27b, soccer club, \$2m state handout already committed) that would enable them to build new and larger facilities, replacing their existing older facilities at ratepayers’ or taxpayers’ expense.

- d) The dollar benefit for these seven organisations would comprise a total council commitment of \$21.8m, according to the Summary Report of Discussion Paper November 2022, *Investing in Community Infrastructure – Sports and Recreation*.
- e) The phrase ‘fit for purpose’ is park lands facilities code language, used to justify significant expansion of built form, initially responding to health, safety and welfare legislation, and disability discrimination legislation criteria. But recent projects have expanded well beyond a need for male and female change rooms and disability compliant toilets into buildings with large expanses of floor area, multiple floor levels and kitchens and food serving areas – delivers the equivalent of a restaurant, or ‘pub in the park’, capitalising on limited liquor licences. This outcome is now already very clear to see in a range of facilities (Parks 9, 10, 24, 25, and 26 (Tennis SA, linked to Park 1) etc).
- f) Since 2011, a number of clubs and associations have benefited from expanded club (‘pavilion’) facilities approvals at park lands sites, made possible through generous interpretations of the Adelaide (City) Development Plan (park lands zone), addition of significant council financial contributions, cheap, long-term leases (often also significantly discounted by the council), and unpublicised state contributions. In most cases, building footprints have expanded beyond the original areas. One could describe it as a coordinated local government and state government park lands buildings racket.
- g) The endorsements by the city council enabling the replacement of these facilities has relied on a mix of non-statutory and statutory policy, including the Adelaide (City) Development Plan (to March 2021, now replaced by the Planning and Design Code for the park lands zone); Adelaide Park Lands Management Strategy (2010 and 2017 versions); as well as other flawed procedural policy documents, such as the Adelaide Park Lands Building Design Guidelines (2008, amended in 2021) and Buildings Asset Management Plan (since 2015). Additionally, there is a draft Park Lands Lease and Licence Policy (2016), now set to be adopted as a revised 2023 version, which is similarly flawed. (**Appendix 1** critiques that version.)
- h) Council’s management of the approvals for existing pavilions since 2011 has relied on a confusing mix of continuously evolving policy and other documents, and use of confidentiality order provisions via section 90(3) of the *Local Government Act 1999* to keep secret pre-approval council design support and other special arrangements and ‘special discount deals’. This management is about to become even more compromised because of updates to many of the policy documents. This proposed new ‘policy’, the subject of this November 2023 submission, would, if adopted, contribute to this.
- i) The 2013 CLMP revision (10 October 2023) has just been approved and is now more than ever before a strongly pro-development park lands management directive, seriously flawed, a proxy for the Planning and Design Code in places (enabling avoidance of a need to amend the Code and thus to avoid the ‘Engagement Process’). The APLMS is on the verge of being

revised and quickly endorsed. The updating of content has already begun. As of 10 October 2023 it is to import substantial content from this new CLMP, which will be beneficial to park lands lessees seeking expanded facilities.

- j) The Adelaide Park Lands Building Design Guidelines were recently updated (2021) but are as flawed in their content as the 2008 version on critical matters, such as footprint and height limits. Its chief feature is a non-committal approach to any quantitative measures, preferring generic ambiguity throughout.
- k) In all of the above park-lands-related documents, ambiguity prevails.
- l) At the conclusion of contemplation of these policy sources emerges council's badly written Park Lands Lease and Licence Policy (2016, but to be replaced by an equally flawed 2023 update: see **Appendix 1**) This will enable late-stage approvals for pavilion upgrades and/or full replacements. Most aspects of this policy's revised version are open to be negotiable, to the benefit of the applicant. Expression-of-interest requirements are easily ignored by the council in favour of the existing lessee. Public transparency and council accountability requirements to reveal concessions and discounts are not key features.

November YourSay 2023 Critique of performance criteria: *Draft Park Lands Community Buildings (Sport and Recreation) Policy*

1.1, 1.2, 1.3

Many generic statements whose meaning is in practice high ambiguous: "minimal infrastructure footprint"; "non-sporting activities ... secondary use"; "minimise hard surfaces", etc. These evidence sloppy policy content.

Principle 2 "while prioritising no net loss" – what does this really mean? Can it be enforced? No.

2.1, 2.2, 2.3

Many generic statements whose meaning is in practice high ambiguous: "Low-scale integrated design", "design features to reduce scale..." (The Building Guidelines have so far failed to do this since 2008... look at some of the results!), "minimising overall footprint". Meaningless in practice.

Principle 4 "designed to be accessible for all..." – but not *operated* to be accessible for all. (If a visitor is neither a lessee nor a sub-lessee the message is Go Away.)

Many generic statements whose meaning is in practice high ambiguous:

4.2: "car parking will not be permitted on park lands" – but it is allowed, under the CLMP's 2021 amendments to Chapter 1, and this "motherhood statement" will have no effect on a reading of that primary statutory policy.

One could go on, but the extensive range of naïve principle and criteria text is too expansive to waste time critiquing.

In summary, I reject this proposal.

APPENDIX 1

There are already ambiguous provisions and loopholes open to abuse in the draft 2023 update to the 2016 *Park lands lease and licence policy* wording

This policy has been endorsed by council, but public consultation has not occurred. Whatever the consultation result is, the policy will still be adopted.

A number of clauses in the draft *Park lands lease and licence policy* (version post-APLA endorsement on 27 April 2023¹) highlight documentation and procedural matters inadequately considered, or to put it another way, ‘made up on the run, to be addressed using so-far-undetermined procedures, sometime later’ by administrators. These require addressing in detail. Issues include:

1. As found under ‘Tenure’, page 1: “Where a significant capital contribution is proposed, a lease or licence may be granted for a period of up to 21 years...” The definition of ‘significant capital contribution’ is not provided. It implies that big money can be allowed to dictate whether a period of up to 21 years will be allowed. Moreover, on the basis of a number of sports pavilion leases approved by council since 2011, the lessee request will almost always be for a 21+21-year term, that is, 42 years. This ambiguity essentially translates to a council park lands policy position that encourages the notion that the bigger the proposal in dollar terms – and obviously built-form terms – the more likely it will result in a very long lease term approval. This continues the vexed application of policy relating to public, park lands community lands management, harking back to previous policy versions. It predicates a decision about lease term length on the principal basis of the sum of money involved.² Put simply, a long lease term, subsequently delivering a large new sports pavilion, should not be predicated on the existence of a grandiose built-form made possible through a large sum of money.
2. As found on page 3 (top of page) “EOI [expressions of interest] submissions will be assessed by a panel against a pre-determined selection criteria that will be publicly available.” No particulars appear regarding this “panel”; no particulars appear about the “pre-

¹ Contained in: APLA agenda paper: *Revised lease and licence policy*, Item 6.1, 27 April 2023, see: Attachment A, pages 46–55 in the agenda; total 9 pages.

² This policy issue, “accepting private investment to fund construction of buildings” was formally explored when the last policy version was under discussion, but its report findings were kept secret. [Research triggered on 5 April 2016: City of Adelaide Infrastructure & Public Space Committee meeting, ‘Private investment in the park lands’, Item 10, pages 221–228.] It appears that council has made no progress since 2016 on resolving the equity and fairness issues relating to the disbursing of long-term leases to some commercial and community applicants.

determined selection criteria”; and no particulars appear about the procedure to ensure that it will be “publicly available”. The policy needs to be explicit about these matters (perhaps using the Glossary, commencing on page 8, and also creating an appendix reproducing the selection criteria). Moreover, the council needs to invest in transparent ways and means to ensure that the public knows about them each time an EOI procedure is triggered. Reference documentation should always appear at any assessment stage, commencing with APLA’s agendas and minutes. Requests by applicants for confidentiality orders, common in the past, should in future be rejected. The park lands are a public asset; a lease is a right of occupation to a public asset.

3. The EOI matter is open to exploitation, especially regarding the ambiguous “pre-determined selection criteria”. A key exception to the triggering of an EOI process is if “... the lease or licence being granted is for a tenure period of two years or less”. (‘Selection of Lessee/Licensee’, page 2, first bullet point). This can create a loophole because it enables lessees to explore capital investment options during the two-year period, seeking private or public funding commitments, hiring architects to draw up concept plans, drafting potential contracts, and encouraging other parties to make in-principle commitments to sub-let the future lease site or the licensed area to address diversity criteria. Each of these actions has the potential to then compromise the EOI panel when the end of the two-year period arrives. For example, in 2017, exploitation of the EOI policy procedure occurred because of these ways.³ A second example is much more recent. The lease for Blackfriars,

³ At Park 24, for example (west of the city), the Comets’ site lease and oval licence was to expire within three months, by 31 May 2017, with Western Districts’ lease to expire on 31 August 2017. Both clubs indicated they wanted a fresh park lands lease and licence to be able to use surrounding open space for new pavilion purposes. They claimed that approval of the lease arrangements would allow them to obtain pavilion funding, using the lease as equity. However, relatively recent amendments (2016) to the council’s *Park Lands Leasing and Licensing Policy* required a call at the initial stage for expressions of interest from other parties “where vacant land or buildings are involved”. This new policy had emerged in 2015 as an equity matter, allowing for the breaking of long periods of park lands occupation by one club or group of clubs, and opening up opportunities for newcomers. But there was a loophole. The new policy did “allow for deviation from this principle in exceptional circumstances”. [APLA, Agenda, Item 6.1, ‘Tampawardli (Park 24) – Community Activity and Sports building’, point 28, 16 February 2017, page 11.] The “exceptional circumstances” (loopholes) were identified by the Adelaide Park Lands Authority. One was that the clubs had already spent \$20,000 developing a new pavilion proposal and concept over the previous year. Secondly: “The proposal demonstrated the opportunity for external investment and shared funding models deemed vital in the *Sports Infrastructure Master Plan* to fill the gap that government partners are unlikely to provide.” The irony was that, within months, the state government granted the clubs \$3.5m to build the pavilion. An additional Authority justification under the “exceptional circumstances” loophole had been that the clubs had indicated future use by multiple other groups. On 28 March 2017 the council agreed about a proposed concept, and agreed to negotiate a lease.

- concluding in October 2023, expired but was quickly extended to 2024. An EOI procedure should have been triggered, but was not.
4. As found on page 3 'Community leases and licences – Fees'. These will be based on calculations regarding area, "(ie, building floor area)". This is an improvement on the long-established metric 'footprint', but what is not clear in the draft policy is what dollar amount will apply to the proposed floor area. If it is a miniscule amount and the likely sports pavilion is to comprise multiple storeys, it will present no hurdle to the applicant. This detail must be explicitly spelled out in the policy. Not to do so allows the City of Adelaide to apply subjectively chosen fees at any given time, and because of this there is potential for exploitation by some existing or proposed lessees relying on the rationales put forward by their planners and planning lawyers. (In the past, some of these rationales have relied on extracts from the *Adelaide Park Lands Management Strategy*, which is riddled with ambiguity with regard to buildings and other facilities on the park lands.)
 5. As found in the same page 3 section: "The calculation of fees will also take into account the level of accessibility to the outdoor facilities when not in use by the lessee or licensee, eg, fenced v unfenced." However, there is no procedure described in the policy draft to ensure that this occurs, and neither is there any periodic term identified for the triggering of the accessibility test, for example, annually. Moreover, it will be impossible for council administrators to determine accessibility at the beginning of the approvals process. It might only be known when the built form or licence area has come into use – and only if public feedback is received. This matter has been poorly thought through. But it is important, because the relatively recent, post-2011 history of the activities of lessees of sports pavilions indicates that public access to new park lands building facilities is commonly restricted by locked gates (eg, to tennis courts) and locked toilets in pavilions (eg adjacent to ovals). Public access to licensed areas (playing fields, etc) is also restricted, most commonly because licensees have allowed their sub-licensees long and exclusive periods of daily access, which frustrates daily public access.
 6. As found on the same page 3 (on the matter of discounts to community lessees and licensees), to establish "sound governance" a procedure is spelled out: "Hold an annual general meeting with audited (*where applicable*) financial statements." *Who* will hold it? *How* will the public know when it is to be held? Why is there wriggle room relating to *audited* statements? What does 'financial statements' mean? A balance sheet is clearly insufficient to establish "sound governance", especially if a club's liabilities exceed its assets! Few sports clubs are comfortable revealing their income and expenditure records to a (non-member) public. They would argue that this detail should be a matter exclusively shared only between the lessor and the lessee.
 7. As found on page 4 (top of page): "Guidelines will be developed to inform how these (discount) measures are assessed." Where are

- these guidelines? When will they be developed? Will the public have access to them? By what mechanism? The guidelines should be attached to the policy as a permanent appendix, and reproduced in any record of deliberations about an application for an extended, or fresh lease, and the rent discounts that may be allowed.
8. As found on page 5: "Council administration will provide a mowing service to community lessees/licensees (where applicable)." This appears to be new, given a new definition on page 9. The definition states 'turfed sports fields' which embraces some very large areas in the park lands. What does "where applicable" mean? If there are exceptions, they need to be spelled out in the policy. Will this service apply to lessees of large areas such as the SACA at Park 25, which did not assume such a public service when it concluded its new lease terms in 2016 and set aside a \$470,000 pa budget for the purpose? The policy needs clarification.
 9. As found on page 5: "Council administration will conduct an annual Park Lands lease and licence forum including sub-lessees." It is not clear whether this is for public transparency purposes or whether it is simply a forum for lessee and licensees to meet. What is the purpose, and will its outcomes be recorded as a public record? The policy needs clarification.
 10. As found on page 5: 'Ownership of Improvements' – "All fixed improvement proposed upon a leased or licensed area will require the approval of Council and be vested in Council at the expiry of the lease or the licence, *if not agreed otherwise.*" This (italicised) qualifier (a loophole) is new. It contradicts the intent of the preceding clause. It provides an exception to the fundamental principle. This has potentially significant consequences, especially if the 'improvements' constitute a major built form, or the 'improvements' constitute costly facilities erected on the licensed area, such as lights towers and other sports related infrastructure, including scoreboards (see point 12 below).
 11. As found on page 6: In relation to consents as per the *Liquor Licensing Act 1997*, "Council administration will consider the proximity of the leased and licensed facility to residents in reviewing these requests." This statement is ambiguous. What does 'consider' mean? Moreover, applicants to the Liquor Licensing court attempting to obtain a limited liquor licence are not required to "consider" this proximity matter, nor is the court, in which case council's vague assurance is really neither here nor there. It is a long-recorded matter that residents adjacent to park lands licence areas are commonly disturbed by noise emanating from events at liquor-licensed park lands leased areas. Worse, if an event occurs at a licensed area, the Act requires enclosure of the area through fencing, which can alienate the public from access.
 12. As found on page 6: Signage: "Permanent manual and electronic scoreboards will be permitted..." This is a new clause, compared to the previous policy version. However, it is not the purview of a council's non-statutory draft lease and licence policy to enable approval of a development plan matter (in this case, the *Planning*

and Design Code for the park lands zone policy areas relating to matters defined as 'development' under planning law). Permanent installation of park lands infrastructure such as scoreboards is a planning matter, not a policy matter. This clause may have been inserted to enable 'retrospective' compliance for the large scoreboard erected in 2017, without 2016 planning permission, at Park 25 for the SACA sports pavilion and oval. This sentence is wide open to abuse. What size of scoreboard? (SACA's is large). Where located in any lease or licence area? The sentence is at odds with wording before it and after it under the 'Signage' heading. It should be struck out.



6 December 2023

Ray Scheuboeck
Team Leader, Community Lifestyle
City Culture
25 Pirie Street, Adelaide SA 5000
r.scheuboeck@cityofadelaide.com.au

City of Adelaide - Consultation on Draft Park Lands Community Buildings (Sport and Recreation) Policy

Dear Ray,

The Australian Institute of Landscape Architects, South Australian Chapter (AILA SA) extends its appreciation to the City of Adelaide to provide feedback on the Draft Park Lands Community Buildings (Sport and Recreation) Policy and discussion papers.

About AILA South Australia

AILA SA leads a dynamic and respected profession, creating great places to support healthy communities and a sustainable planet.

We work together to create healthy communities, connected urban green infrastructure, and liveable, sustainable cities and regions. Our 2,900+ members are driven by AILA's Strategic [Plan](#) core values of Connection to Country and Climate Change, and are committed to creating ***'A greener, healthier, inclusive and climate resilient South Australia'*** which is further embedded in our advocacy approach.

The work of South Australian landscape architects is recognised for creating liveable cities, healthy active spaces, and sustainable design outcomes for everyone. Our 200+ South Australian members have helped shape many projects across the State, creating the vibrant community spaces for all.

AILA SA's advocacy

AILA advocates leading positions on issues of concern to our cities, suburbs and regions on matters regarding landscape architecture. We prefer to work alongside government to improve the design, planning and management of the natural and built environment.

Our own Advocacy Manifesto, attached for your information, focuses on positive improvements to protecting, enhancing and creating a more sustainable and inclusive South Australia. We also note there are a range of issues that were heightened during the recent worldwide pandemic which have maintained importance in planning and design, and these include:

- equitable and safe access to quality, local, and green parks, open spaces and community infrastructure
- equipping our cities, towns, and regions to be climate resilient in a warming, dry climate
- supporting more people walking and cycling
- authentic and effective reconciliation with First Nations people



Feedback on the Policy

AILA SA is supportive of the overarching vision and alignment of the *Draft Park Lands Community Buildings (Sport and Recreation) Policy*, and *Investing in Community Infrastructure – Sports and Recreation: Discussion Paper* in particular, the following outcomes:

- Use of and access to the Park Lands through participation in community sport and recreation
- Protecting and promoting the Park Lands
- Mitigating the effects of climate change and ensuring integrated and sustainable development
- Thriving communities through increased use of and access to the Park Lands
- A dynamic city culture that strengthens efforts to protect and promote the Park Lands
- Environmental leadership by mitigating the effects of climate change and ensuring integrated and sustainable development

In response to these papers, AILA SA has identified the following four strategic recommendations:

Recommendation 1: Develop a clear and concise Vision for the future of Park Lands Community Buildings

We recommend that two key questions are posed to further develop the Park Lands Community Buildings policy – and these include “What is the future of the Park Lands?” and “Who are the Park Lands for”? These questions are a critical starting point and should guide the development of community infrastructure.

Recommendation 2: Balance sporting and community needs

An emphasis has been placed on sporting needs. While we acknowledge the importance of sporting infrastructure within the Park Lands, we also highlight the need for equitable and safe access to quality, local, and green parks, open spaces and community infrastructure for the general recreation by the community.

We recommend that Principle 1 wording is amended to include the term ‘recreation’ and an additional performance criterion is included. We also recommend that further clarity surround items which may be considered as community infrastructure is provided.

Recommendation 3: Acknowledge cultural and natural heritage

The Park Lands may be considered as collection of diverse and important places with layers of cultural and natural heritage and distinct characters. What sits well in Denise Norton Park / Pardipardinyilla (Park 2) for instance would not be appropriate for Carriageway Park / Tuthangga (Park 17).



Therefore clearer links should be established with the Adelaide Park Lands Management Strategy and Adelaide Park Lands Community Land Management Plans to determine character of individual park lands, community offering and biodiversity opportunities.

We also recommend a new approach to designing on Country to provide genuine and meaningful partnerships with First Nations, highlighting the cultural history and relevance within our green publicly accessible open spaces.

Recommendation 4: Highlighting and capitalising on the value of green public accessible places

The value of green publicly accessible places for all should be strengthened within the vision for the Policy.

To capture the value, we recommend expanding metrics used to measure the usage of community infrastructure to include modes of access and non-sporting events (free or ticketed), to determine appropriate service levels, amenity provided and create diversity within the Park Lands offering.

Summary

Our four strategic and important recommendations are based on many years of active and positive advocacy from AILA and our members across Adelaide and South Australia for improvements to the Park Lands over many years.

We would welcome the opportunity to discuss our feedback or provide more detailed commentary to further explain the feedback above.

Thank you again for the opportunity to be involved with this consultation process.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'J Arbon', is positioned below the text 'Yours sincerely,'.

Dr Janelle Arbon, Fellow (AILA), Registered Landscape Architect
President, AILA South Australian Chapter

Recommendation 4 - Item 7.4 - Attachment C

From: Heather Nimmo <hnimmo@westnet.com.au>

Sent: Wednesday, November 29, 2023 8:19 AM

To: 'r.scheuboeck@cityofadelaide.com' <r.scheuboeck@cityofadelaide.com>

Subject: Draft Park Lands Community Buildings (Sport and Recreation) Policy

Dear Ray,

How are you? I have been away avoiding the car race and have missed the deadline for this consultation, but I wondered whether the following comments/questions could be included:

1. It makes sense that the Council should be a partner in any construction on the Park Lands. Too often in the past, organisations have employed architects to design 'Taj Mahals' which are then denied permission by the Council, often only after protests by other park users. Consultation with other park users should be early in the process and not at the end.
2. Priority should be given to organisations that provide sport and recreation for City of Adelaide residents. Some sporting organisations seem to come from other Council areas (which may have sold-off open space) or are private schools catering for students outside the City of Adelaide boundary. Or are fitness businesses.
3. Maintenance (such as mowing) should be done by the City of Adelaide Council not the organisation (which should pay the Council to do this) to ensure proper standards are maintained and that there is clarity about accountability.
4. Remove kiosks from the community buildings. Kiosks are **'premises that are used for the purposes of selling food, light refreshments and other small convenience items such as newspapers, films and the like'**. They are commercial ventures in competition with cafes bordering the Park Lands. Also, kiosks can morph into elaborate kitchens for large-scale commercial events.
5. Increasing biodiversity, using plants of the Adelaide Plains, and reducing hard surfaces, should be a requirement for any sporting lease. Sporting organisations should not be able to argue that trees get in the way of their activities. The Council needs to ensure greater tree canopy over walking and cycling trails in the Park Lands.
6. Any lease should specify how the sporting organisation will allow other park users to share facilities and open space. And there should be penalties if the organisation makes it difficult for others to do so. The focus must be on 'sharing' and not 'owning'.
7. Lighting should only occur where it doesn't affect nearby residents (and Park Land fauna). There is too much light pollution in the City as it is.
8. Many (most?) people using the Park Lands prefer individual, active recreation to engagement in organised sport, but the lease system doesn't cater for this somewhat anarchic activity. How to accommodate these people (who don't require elaborate infrastructure, and who patronise local cafes after their walk or cycle) but who don't pay through a lease to use the Park Lands, and therefore have no 'right' to such use? Should the Council rates include a separate line for Park Lands use that gives residents the 'right' to use the Park Lands?

I'm out all morning but if you would like me to phone you in the afternoon, let me know.

Cheers
Heather

From: Heather Nimmo <hnimmo@westnet.com.au>

Sent: Friday, December 1, 2023 3:33 PM

To: Ray Scheuboeck <R.Scheuboeck@cityofadelaide.com.au>

Subject: RE: Draft Park Lands Community Buildings (Sport and Recreation) Policy from Heather Nimmo

Thanks, Ray.

Two final suggestions/comments:

- That the leasee (rather than the Council ranger who, it seems, feels intimidated by those parking illegally) is responsible for making sure that there is no illegal parking on Park Lands during the organisation's activities (such as sports matches on park 15) and will have its lease revoked if it does not stop the illegal parking. The organisation is made responsible for the illegal parking and not the Council.
- The use of public address systems by leasees should be discouraged as affecting the amenity of the Park Lands for other users, and residents living nearby.

I could go on and on,

Cheers
Heather



ORSR20/0749/B1667607

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Kidman Park SA 5025
PO Box 219
Brooklyn Park SA 5032
Tel 1300 714 990
ABN 81 213 956 472
www.orsr.sa.gov.au

Mr Ray Scheuboeck
Team Leader, Community Lifestyle
City of Adelaide
25 Pirie Street
ADELAIDE SA 5000

By email: r.scheuboeck@cityofadelaide.com.au

Dear Mr Scheuboeck

Thank you for providing the Office for Recreation, Sport and Racing (ORSR) the opportunity to provide comment on the Draft Park Lands Community Buildings (Sport and Recreation) Policy (the Policy).

ORSR considers the Park Lands a significant contributor to the health and wellbeing of Adelaide's residents through the diverse range of sport and recreation offerings provided. ORSR has consistently provided support for planning and facility development across the Adelaide Park Lands in recognition of this key role.

Provision of physical activity opportunities is vital to increasing the health and wellbeing of our communities. It is important therefore to provide a variety of accessible locations to encourage people to be physically active including provision of sporting fields and supporting infrastructure such as fit-for-purpose clubrooms and changerooms required for optimising their use.

As you are aware ORSR has several grant programs that support the development of sport and recreation facilities including change rooms and associated amenities. Further information on grants is available on the ORSR website <https://www.orsr.sa.gov.au/> or by contacting ORSR Funding Services by phone on 1300 714 990 or via email at ORSR.Grants@sa.gov.au.

Any consideration of Government investment in a sporting facility outside of ORSR grant programs would need to go through the State Sport and Recreation Infrastructure Plan (SSRIP) process managed by the ORSR.

Any proposal for funding through SSRIP would need to be supported by a Full Business Case which may include a detailed cost-benefit analysis, concept design plans and an independent cost estimate report.

ORSR has developed several resources including a Business Case template and Benefit Cost Analysis tool that can assist Council through the process.

Please contact Mr David Nash, Manager Recreation and Sport Planning, ORSR by phone on 0401 120 360 or via email at david.nash@sa.gov.au for more information, advice and access to these resources.

ORSR congratulates Council on the development of the draft Policy to date and acknowledges the significance of the Policy for the Council, sporting groups that utilise facilities in the Park Lands and the greater South Australian community.

It should be noted that a number of Park Lands facilities such as Victoria Park and, Karen Rolton Oval support higher than local level sporting competitions and that this needs to be considered in the Policy.

Attachment 1 provides ORSR's comments for Council's consideration. Thank you for the opportunity to provide comment on this important matter and if you wish to discuss this submission in more detail, please contact Mr Nash at the aforementioned contact details.

ORSR wishes Council every success in finalising and implementing the Park Lands Community Buildings (Sport and Recreation) Policy and looks forward to working collaboratively with Council on future initiatives and developments.

Yours sincerely

Kylie Taylor
CHIEF EXECUTIVE
Office for Recreation, Sport and Racing

5 December 2023

Attachments:

Attachment 1 - Draft Park Lands Community Buildings (Sport and Recreation) Policy - Office for Recreation, Sport and Racing (ORSR) Comments (27/11/23)

Attachment 1: Draft Park Lands Community Buildings (Sport and Recreation) Policy - Office for Recreation, Sport and Racing (ORSR) Comments (27/11/23)

Policy Purpose and Principles	ORSR COMMENTS
<p>This policy guides the regeneration of community buildings and associated infrastructure in the Adelaide Park Lands to support:</p> <ul style="list-style-type: none"> • use of and access to the Park Lands through participation in community sport and recreation • protecting and promoting the Park Lands • mitigating the effects of climate change and ensuring integrated and sustainable development <p>The application of this policy must be consistent with the Adelaide Park Lands Management Strategy and Adelaide Park Lands Community Land Management Plans with regards to the location of community sports and active recreation landscapes.</p> <p>This policy also informs Council’s approach to investing in City of Adelaide owned community buildings and associated infrastructure that are (or proposed to be) leased and licensed to external community organisations.</p> <p>This policy should be read in conjunction with the Park Lands Lease and Licence Policy, Adelaide Park Lands Building Design Guidelines and Buildings Asset Management Plan.</p>	<ul style="list-style-type: none"> • No comment.

Policy Purpose and Principles	ORSR COMMENTS
<p>Principle 1 – Balance a minimal infrastructure footprint and scale with fit for purpose facilities required to support local community sport.</p>	
<p>Performance Criteria 1.1 – Community buildings will service outdoor community sport and recreation.</p> <p>1. Community buildings will only be considered in the Park Lands where they are required to support outdoor sport and recreation.</p>	<ul style="list-style-type: none"> • #1 – ORSR supports this performance criteria.
<p>Performance Criteria 1.2 – Must be for community sport participation, excluding elite competition. Non-sporting activities may be a secondary use.</p> <p>2. Community sporting spectator facilities secondary to day-to-day use must be temporary.</p> <p>3. Minimise hard surface surrounds, utilising permeable surfaces.</p> <p>4. Enhance irrigated turf surfaces to increase carry capacity.</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> • What is the definition of elite competition? Some Park Lands assets are, or have the potential to be, used for elite competition i.e. Victoria Park Criterium Track, Karen Rolton Oval, City Skate, Football Ovals, Tennis Courts etc where a particular team plays in a state competitions highest grade. • #2 - ORSR supports this performance criteria. However, ORSR suggests replacing the word “must” with “should” be temporary. • #3 - ORSR supports this performance criteria. • #4 - ORSR supports this performance criteria.
<p>Performance Criteria 1.3 – New community buildings will not exceed the ‘core’ elements of local level provision.</p> <p>5. Council will plan for and support the provision of community infrastructure in the Park Lands that is fit for purpose at a local level within a sports facility hierarchy.</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> • #5 - Some Park Lands assets are, or have the potential to be, used for high level competition than ‘local’ i.e. Victoria Park Criterium Track, Karen Rolton Oval, City Skate, Football Ovals, Tennis Courts etc – clubs play in district, regional level competition which is likely to require a higher level of infrastructure than “local level”. • #5 - What about facilities that are used by multiple sporting clubs (e.g. cricket, football). Local level facility standards may be different for each sport, which one

Policy Purpose and Principles	ORSR COMMENTS
	would be chosen?
<p>Principle 2 – Deliver community buildings that perform their purpose while prioritising no net loss of Park Lands.</p>	
<p><u>Performance Criteria 2.1</u> – Planning of new community buildings will include City of Adelaide identifying the removal of one or more existing buildings and/or equivalent hard stand areas.</p> <p>6. A new community building will be considered where the City of Adelaide can demonstrate that the footprint will not exceed the <u>fit for purpose</u> requirements of the <u>local level provision</u> and minimise the loss of Park Lands.</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> • ORSR supports the general intent to minimise Park Lands footprint and consolidate the number of buildings accordingly. However, the way this criterion is currently worded may restrict the opportunity to support sport and recreation activities. • #6 – Some Park Lands assets are, or have the potential to be, used for high level competition than ‘local’ i.e. Victoria Park Criterium Track, Karen Rolton Oval, City Skate, Football Ovals, Tennis Courts etc – clubs play in district, regional level competition which is likely to require a higher level of infrastructure than “local level”. • #6 – What about facilities that are used by multiple sporting clubs (e.g. cricket, football). If the facility standards are different for each sport, which one would be chosen?
<p><u>Performance Criteria 2.2</u> – Community buildings will service multiple users and uses.</p> <p>7. The planning of new community buildings will involve engagement with multiple stakeholders to facilitate use by more than one community organisation.</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> • #7 – ORSR supports this performance criteria.

Policy Purpose and Principles	ORSR COMMENTS
<p><u>Performance Criteria 2.3</u> – Community buildings will incorporate design features to reduce scale and visual impact through compact layouts, multi-functional spaces, efficient circulation, shared facilities and low scale integrated design.</p> <p>8. Compact Layout – Create a compact building layout that maximises usable floor space while minimising overall footprint. Avoid unnecessary elements that increase the building's size without adding significant functionality. Link internal common areas to covered outdoor areas to maximise 'sheltered' community spaces for community gatherings.</p> <p>9. Multi-Functional Spaces – Design spaces that serve multiple purposes to reduce the need for separate rooms or areas. Incorporate movable partitions, modular furniture, and adaptable layouts to accommodate different needs and group sizes.</p> <p>10. Efficient Circulation – Plan for efficient circulation patterns within buildings to minimise corridor areas and wasted space.</p> <p>11. Shared Facilities – Provide shared facilities and common areas for multiple users.</p> <p>12. Low Scale Integrated Design – Ensure new buildings are fit for their Park Lands setting and are visually discrete. Design buildings minimal scale to complement the Park Lands context, using materials and colours that blend with the natural surroundings.</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> • #8 – ORSR supports this performance criteria. • #9 – ORSR supports this performance criteria. • #10 – ORSR supports this performance criteria. • #11 – ORSR supports this performance criteria. • #12 – ORSR supports this performance criteria.
<p>Principle 3 – Maximise sustainable development and environmental performance of community buildings.</p>	
<p><u>Performance Criteria 3.1</u> – <i>Site community buildings to maximise efficiency and environmental performance.</i></p> <p>13. Site selection will be informed by a comprehensive site analysis with no loss of</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> • #13 – ORSR supports the intent of this but suggests replacing the word “no” with “minimal” loss of existing trees.

Policy Purpose and Principles	ORSR COMMENTS
<p>existing trees.</p> <p>14. The topography of the selected site will be utilised for sustainable water management. Consider modular buildings to minimise site disturbance.</p>	<ul style="list-style-type: none"> #14 – ORSR supports this performance criteria.
<p><u>Performance Criteria 3.2</u> – Achieve a 5 Star Green Star (or equivalent) certification for all new community buildings.</p> <p>15. Key design features of community buildings in the Park Lands may include:</p> <ul style="list-style-type: none"> green roofs to reduce building heat absorption and promote biodiversity locally indigenous plantings within the buildings' surroundings to support biodiversity and wildlife habitat maximising the use of natural light and ventilation to reduce the need for artificial lighting and heating, ventilation air conditioning (HVAC) systems <p>16. use of sustainable materials and renewable energy sources to reduce environmental impact</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> #15 – No comment. #16 – ORSR supports this performance criteria.
<p>Principle 4 – Create high quality welcoming and accessible facilities to maximise community use.</p>	
<p><u>Performance Criteria 4.1</u> – Community buildings will be designed to be accessible for all.</p> <p>17. Prioritise single level buildings for optimal accessibility and use, incorporating universal design principles to create a welcoming environment for everyone.</p> <p>18. Provide generous shelter and shade and amenities including seating, handwashing facilities, drinking fountains, kiosks, and toilets.</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> #17 – ORSR supports this performance criteria. #18 – ORSR supports this performance criteria.
<p><u>Performance Criteria 4.2</u> – Community buildings will be accessible via path networks and on-street parking.</p>	<p>Performance Criteria:</p> <ul style="list-style-type: none"> #19 – ORSR supports this performance criteria.

Policy Purpose and Principles	ORSR COMMENTS									
<p>19. Link community buildings and associated sports facilities to public transport and cycling and walking networks to encourage sustainable transport options.</p> <p>20. Car parking will not be permitted on the Park Lands, with the exception of loading and unloading, drop off and pick up, and disability parking.</p> <p>21. Implement indented parking measures to optimise visitor safety along roadways. Avoid the addition of access roadways. If unavoidable, use permeable surfaces.</p>	<ul style="list-style-type: none"> • #20 – No comment • #21 - ORSR suggests adding ‘where possible’ to before ‘implement’ to read ‘Where possible, implement indented parking measures to optimise visitor safety along roadways.’ 									
<p>Principle 5 – Support diverse participation through equitable co-funding</p>										
<p>22. Performance Criteria 5.1 – Provide transparent and equitable co-funding of community buildings and associated facilities. Council will co-fund projects that meet the following eligibility criteria:</p> <table border="1" data-bbox="226 802 1267 1461"> <thead> <tr> <th data-bbox="226 802 1267 863">Project Co-funding Criteria</th> </tr> </thead> <tbody> <tr> <td data-bbox="226 863 1267 924">Project brief co-designed with Council</td> </tr> <tr> <td data-bbox="226 924 1267 984">Consistent with the Adelaide Park Lands Management Strategy</td> </tr> <tr> <td data-bbox="226 984 1267 1083">Delivers core elements of local level provision and focuses on community participation in outdoor sport and recreation</td> </tr> <tr> <td data-bbox="226 1083 1267 1182">Results in increased accessibility, inclusion and/or utilisation of community facilities within and outside training and competition times</td> </tr> <tr> <td data-bbox="226 1182 1267 1281">Results in upgrading or creating an asset that is owned and managed (through a lease or licence) by Council</td> </tr> <tr> <td data-bbox="226 1281 1267 1342">Benefits more than one user group or organisation</td> </tr> <tr> <td data-bbox="226 1342 1267 1402">Complies with the principles contained in this policy</td> </tr> <tr> <td data-bbox="226 1402 1267 1461">Incorporated in Council’s Long Term Financial Plan</td> </tr> </tbody> </table>	Project Co-funding Criteria	Project brief co-designed with Council	Consistent with the Adelaide Park Lands Management Strategy	Delivers core elements of local level provision and focuses on community participation in outdoor sport and recreation	Results in increased accessibility, inclusion and/or utilisation of community facilities within and outside training and competition times	Results in upgrading or creating an asset that is owned and managed (through a lease or licence) by Council	Benefits more than one user group or organisation	Complies with the principles contained in this policy	Incorporated in Council’s Long Term Financial Plan	<p>Performance Criteria:</p> <ul style="list-style-type: none"> • #22 –ORSR supports this performance criteria. • #23 – ORSR supports this performance criteria. <i>NOTE: ORSR maximum funding is typically 50% (unless specific criteria are met around SEIFA or non LGA owned asset). Therefore, ORSR expected minimum contribution from other parties to be 50%.</i>
Project Co-funding Criteria										
Project brief co-designed with Council										
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Benefits more than one user group or organisation										
Complies with the principles contained in this policy										
Incorporated in Council’s Long Term Financial Plan										

Policy Purpose and Principles				ORSR COMMENTS
23. Council will consider co-funding the design and construction costs on the following basis:				
Primary Lessee (existing or proposed)	Minimum Council co-funding contribution	Maximum Council co-funding contribution	Minimum Lessee co-funding contribution	
Not for profit Community Club or Association	No minimum	Up to 50%	No minimum	
State Sporting Association	No minimum	Up to 50%	At least 25%	
Educational Institution	No minimum	Up to 25%	At least 50%	

Policy Purpose and Principles	ORSR COMMENTS
<p>APPLICATION OF THIS DOCUMENT</p> <p>Compliance with this policy requires each performance criteria to be addressed.</p> <p>Council will undertake to apply this policy in accordance with:</p> <ul style="list-style-type: none"> • City of Adelaide Park Lands Lease and Licence Policy and the: <ul style="list-style-type: none"> ○ process for selection of lessees/licensees ○ setting of lease and licence conditions ○ management of lessees/licensees and sub-lessees/licensees • City of Adelaide Buildings Asset Management Plan and the: <ul style="list-style-type: none"> ○ maintenance, renewal and disposal of building assets 	<ul style="list-style-type: none"> • No comment
<p>OTHER USEFUL DOCUMENTS</p> <p>Related documents</p> <ul style="list-style-type: none"> ▪ Adelaide Park Lands Building Design Guidelines ▪ Adelaide Park Lands Community Land Management Plan ▪ Adelaide Park Lands Management Strategy ▪ Buildings Asset Management Plan ▪ Park Lands Lease and Licence Policy <p>Relevant legislation</p> <ul style="list-style-type: none"> ▪ <i>Adelaide Park Lands Act (SA) 2005</i> ▪ <i>Local Government Act (SA) 1999</i> 	<ul style="list-style-type: none"> • No comment

GLOSSARY

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

- 24. **Adelaide Park Lands:** Those areas of the Park Lands defined by the *Adelaide Park Lands Act 2005*, which have been Gazetted by Parliament and defined to be under care and control of the City of Adelaide.
- 25. **Adelaide Park Lands Community Land Management Plan:** A document required under the *Local Government Act (SA) 1999*, that informs how community land under the care and control of the City of Adelaide will be managed in accordance with the Adelaide Park Lands Management Strategy, including the identification of leased and licensed areas.
- 26. **Adelaide Park Lands Management Strategy:** A document required under the *Adelaide Park Lands Act (SA) 2005*, that sets the strategic framework for the overall planning and management of the Adelaide Park Lands.
- 27. **Building Floor Area:** The floor space measured to the inside wall lines.
- 28. **Building Footprint:** The ground level area of a building measured to the outside wall line, not including open hardstand areas.
- 29. **Community Building:** A community building that is provided for the primary purpose of supporting organised use of adjacent outdoor sports and recreation facilities at a local level in the Park Lands.
- 30. **Core Elements:** The table below details core elements of local level provision.

Core Elements - Buildings	Notes
Participant Change Room	Minimum of two and maximum of four (full size) change rooms

- #30 (Core Elements) – This should align with sport-specific requirements and consider the number of sporting fields the building supports.
- #33 (Sports Facility Hierarchy) – As per ORSR previous comments, some Park Lands assets are, or have the potential to be, used for **high level competition than ‘local’** i.e. Victoria Park Criterium Track, Karen Rolton Oval, City Skate, Football Ovals, Tennis Courts etc – clubs play in district, regional level competition which is likely to require a higher level of infrastructure than “local level”.

Policy Purpose and Principles		ORSR COMMENTS
Participant Amenity	Up to three showers / toilets per amenity Minimum of two and maximum of four change room amenities	
Match Officials / Umpires Change Room	Minimum of two and maximum of four change rooms incorporating one shower / toilet per room	
First Aid Room	Maximum of two rooms	
Public / Spectator Toilets	One accessible and two ambulant	
Storage	May be larger where storage of specialist sports equipment is required and/or multiple user groups	
Core Elements - Buildings	Notes	
Cleaning Closet		
Kitchen / Kiosk	Includes storage space	
Common Area	Includes meeting space	
Covered Outdoor Area	Cannot be enclosed	
Core Elements – Associated Infrastructure	Notes	
Lighting	To support sports training and competition	
Playing Fields / Greens	Irrigated natural or hybrid turf	
Sports Courts	Sports specific surfaces, but cannot be fully fenced	

Policy Purpose and Principles		ORSR COMMENTS
<p>Netting / Fencing</p>	<p>Where required for safety, but cannot exclude community access outside of training and competition times</p>	
<p>31. Lessee/Licensee: An organisation that has a direct legal relationship with Council via a lease or licence.</p> <p>32. Local Level Provision: Facilities built and maintained to a local community sport standard as per sports facility guidelines to support senior and junior sports training and competition.</p> <p>33. Sports Facility Hierarchy: The level of competition proposed to be played at a facility will inform the extent and standard of sports infrastructure provision. Typical hierarchy categories are State, Regional, District and Local</p>		