



22 August 2018

Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

Re: Byron Shire Council submission - Cultural Events Site - State significant Development Application (SSD 8169)

Council notes that further information has been provided to the Department of Planning and Environment for consideration addressing various issues raised to date during the assessment process. Council remains concerned on the scale of the proposal and the ultimate numbers that are being sought in terms of patrons plus volunteers, staff and performers. The following comments are of relevance

Waste Water Assessment

The proposed wastewater assessment relies on the following fundamentals:

1. Very low wastewater generation rates;
2. Staged upgrade of OSMS as budgeting allows;
3. Continued burial of human compost on site;
4. Nutrient build up on dispersal areas over time;
5. The use of flood prone area for the surface spray irrigation of treated effluent via the incorporation of a complicated and integrated system of sensors, pumps, timers etc.; and
6. Continued transportation of kitchen festival sullage (trade waste) to Byron and Ballina STP (544k/L annum).

Whilst reference is made to a meeting between the applicant and Byron Shire Council's General Manager and Infrastructure Manager regarding acceptance of kitchen sullage there is no confirmation of acceptance by Council's Infrastructure services nor is there any verification from Ballina Shire Council that they will accept effluent from the development. These remain issues that need to be addressed by the applicant in either demonstrating how they comply with Clause 45 Provision of Services of Byron LEP 1988 or Clause 6.6 Essential Services of Byron LEP 2014.

The resultant Onsite Sewage Management System to accommodate up to the maximum of 50,000 patrons plus 5,750 staff for a single event requires a significant initial and ongoing commitment in resources, system design, management, operational/ qualified expertise, maintenance, monitoring, co-ordination, liaison, quality assurance, auditing and reporting to be successful. It is understood the Department had or were engaging GHD to provide expert advice in relation to the above. Council would be happy to meet with those experts at a latter time to discuss if required.



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Management and Restrictions to limit the expansion of the Events Site

The Department needs to be assured that the appropriate management regimes are in place for the Cultural Event Site to manage noise, traffic, impacts on surrounding residential properties, the natural environment and Council infrastructure. In this regard the site is constrained by a range of natural hazards as previously discussed, is not serviced by reticulated water or sewer and adjoins Coastal Wetlands, the Billinudgel Nature Reserve, and other areas of high value vegetation.

Where there is any uncertainty it is recommended that the Department carefully consider limiting any extension on patron numbers or event days as previously suggested in Councils correspondence dated 9 March 2018.

If you require any further information or assistance in regards to Council's submission please contact Chris Larkin Manager Sustainable Development on (02) 66267000.

Yours sincerely



Per: Shannon Burt

Director Sustainable Environment and Economy