

**North Byron Parklands Cultural Events Site - Tweed
Valley Way and Jones Road, Yelgun
Cultural Events Site - State sign
Cultural Events Site - State significant Development
Application (SSD 8169)ificant Development
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I wish to express my opposition to both of the above.

As a resident of the Shire and as someone in close proximity to the site I am deeply concerned at many levels.

My primary concern is that an activity that should be and could be run at a local level with all necessary inputs from the local community is being farmed out to a State bureaucracy. This is not only a step backward in the democratic process but also contrary to the original intentions of the organizers proposals.

Furthermore I wish to raise the following as serious areas of doubt, concern and opposition.

The festivals have been operating profitably under a conditional trial approval for five years and operated for many years before that with year-to-year approvals from Council. If Parklands receives any further approval from the state, it should be conditional on *annual* reviews, and it should have to meet specific, rigorous conditions that Byron and Tweed Councils have set in consultation with local residents.

Parklands claims their compliance with consent conditions has been close to 100%, but locals have documented close to 100 breaches and other irregularities since trial approval was granted. The DOP has issued only a few Penalty Infringement Notices (fines) and Official Cautions (no fines) and does not even appear to have an accurate record of breaches and irregularities. (The DOP has not yet provided clear and complete information about breaches.) If the state remains in charge, oversight and enforcement will continue to be lax and inadequate.

To demonstrate their performance on key variables, Parklands hires consultants to monitor things and prepare reports. Parklands then sends the reports to the DOP for review. No independent monitoring has been done at any time during the trial. Parklands' self-monitoring and self-reporting remains a major issue and will continue to be a major issue if this proposal is approved.

No independent analysis has been done that objectively weighs the purported benefits of the festivals against the costs to the community. The Economic Benefits Report, Appendix W in the proposal, was generated by a Parklands-paid consultant. The report is presented "without the assumption of a duty of care to any other person other than the client [Parklands]" and the report further cautions any third party from "using or relying on the facts, content, opinions or subject matter" in the report. Experts in assessing economic costs and benefits have described the

report as incomplete, inaccurate, and misleading. Strategies such as this make us skeptical of any genuine supervision of Parklands.

We remain quite unconvinced that the proposal will serve us or the community we live in at all well and that we will be totally cut off from any say over an event of such magnitude.

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