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

Dear Sir/Madam

North Byron Parklands Culture & Event Site, Yelgun, State Significant Development (SSD 8169) and Modification of the Concept Plan (MP09_0028 Mod 5) – Amendment to Administrative Conditions - Objection

I have read with dismay the development application, modification request, Environmental Impact Statement and other documentation associated with the proposal to (a) increase the number of outdoor events up to 20 event days per year and the progressive growth of *Splendour in the Grass* to 42,500 patrons and then 50,000 patrons a day, and (b) continue use of existing site infrastructure and to develop additional infrastructure.

The monumental intensification of activity the proposal will generate has raised numerous environmental issues identified during the Secretary's Environmental Assessment Requirements process. The proposal should be rejected on any one of them.

My submission is focussed on the proposal's probable impact on the koalas which are now acknowledged to come and go over the Parkland site which itself is acknowledged as having a significant connectivity role to areas of koala habitat in the broader locality. This habitat supports the **endangered** koala population between the Tweed and Brunswick Rivers east of the Pacific Highway.

Noise management has been an on-going challenge for the proponents – event noise monitoring has been undertaken on only three events during the trial period and was complicated by non-compliances, community concerns and ongoing mitigation. Then too maximum patronage only reached 32,500 during the trial – a very long way from the 50,000 maximum now sought.

Published studies on the impact of noise on koalas are few, however monitoring of the Bluesfest site at Tyagarah which is also subject to an individual Koala Plan of Management prepared under State Environmental Planning Policy No. 44 (SEPP 44) has provided published evidence of aversive behaviour by koalas in response to episodic loud noise and a trend of decreasing koala presence on the site. It is reasonable to conclude that the intensification implicit in the proposed use of North Byron Parklands would reap similar results.

In regard to the North Byron Parklands Koala Plan of Management, I suggest that consultation regarding scheduled koala monitoring (Section 6: Monitoring and Adaptive Management) should include Tweed Shire Council as well as Byron Shire Council.

6.2 Program

Koala monitoring will occur every two years, with the next scheduled monitoring event to occur in 2018. Ideally, monitoring will be linked to surveys being undertaken in the wider region, as guided by the BCC KPoM and Tweed Coast Comprehensive Koala Plan of Management. Parklands staff sill consult with relevant stakeholders at Byron Shire Council and Tweed Shire Council prior to each round of monitoring commencing, to seek opportunities for alignment of efforts.

Yours sincerely

Lorraine Vass 319 Tregeagle Road WYRALLAH NSW 2480

16 February 2018