

From:  
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15<sup>th</sup> February 2018

To:  
NSW Department of Planning and Environment

**RE: North Byron Parklands SSD Application 8169 and MP09\_0028 (MOD5)**

I strongly oppose the Parklands SSD application and Modification for the following reasons:

**1. Inconsistency with the PAC approved Concept Plan**

The PAC approval stated that at the end of the trial period further approvals should be issued by Byron Council. Having the Department of Planning and Environment control the festival site is not consistent with the existing PAC-approved Concept Plan. Rather than prepare for this, Parklands gained approval from the DPE to extend their trial period and applied to become a State Significant Development.

**2. No Local Control**

If this proposal is approved, the local community and its elected officials will no control as was the case as with the Part 3A approval in 2012. The state will be in charge but will not be accountable to local residents. Byron and Tweed Councils will have no say. This is not right and not fair. Byron Council, in consultation with local residents and business owners, should be determining the shire's destiny—not the state government.

**3. Tourist Impact**

Byron Shire's infrastructure is already struggling to cope with the high number of tourists. Permanent approval of this development will bring increasing numbers of tourists to the area placing even more strain on our dilapidated roads, overloaded sewage systems and fragile environment.

**4. Conditional Annual Approval vs Permanent Approval**

Byron Shire is host to dozens of annual festivals. They operate profitably with an annual approval. Falls and Splendour 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.

## **5. DOP Lax Oversight**

Parklands self-monitoring of their consent conditions is not holding up to scrutiny of the local community. Parklands claim that there has been close to 100% compliance, but locals have documented close to 100 breaches and other irregularities since the trial approval was granted. The DPE has issued only a few fines and does not even appear to have an accurate record of breaches and irregularities. We have no faith that if the state remains in charge that compliance will be enforced. DPE staff are rarely seen during the festivals.

## **6. Emergency Evacuation Challenges**

The Police report stated there would be extreme difficulty in evacuating 30,000 or more people from the event site in a flood or fire event. Allowing ever increasing patron numbers places them at high risk of their personal safety and is irresponsible of the organisers.

## **7. An Independent Cost-Benefit Analysis Requirement**

Experts in assessing economic costs and benefits have described the cost benefit analysis report as incomplete, inaccurate, and misleading. An independent analysis should have been completed to objectively weigh the alleged 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.

## **8. True State Significant Asset**

The government of NSW has invested millions of dollars over decades into Billinudgel Nature Reserve and Marshalls Ridge Wildlife Corridor. These are the most state significant assets in the north of Byron Shire. Approval of this proposal will irrevocably and detrimentally change the nature of this vulnerable and ecologically-significant area. The state should not have been approved festivals at Parklands to begin with. They now have a chance to correct that earlier mistake.

## **9. Wildlife Impacts**

The stress on the wildlife, including the vulnerable koala, in the Yelgun wildlife corridor is significant due to the impact of the excessive noise levels, patrons and traffic. The approval of more permanent events will exacerbate that impact and reduce the recovery time for the wildlife.