

**I am objecting to the 20-month extension of the trial sought by North Byron Parklands on the following grounds:**

1. The applicant is taking away from Byron Shire Council (BSC) its legislative role as the approving authority, as per Condition C1 of the existing Concept Plan for festivals, after completion of the existing trial period. This strategy deliberately disempowers the purpose of local government and worse, deliberately dismisses local intelligence about the impact of festivals on the local area and its community.
2. The applicant is clever but not smart morphing a 'transitional development' under Part 3A of the planning act to apply to an extension of its trial. Part 3A was revoked in 2011 and should not apply to an extension period after the existing 5 year trial has expired. I do not believe it was the intent of Part 3A to be appropriated in this manner. Worse, it would set a precedent for perhaps indefinite number of extensions.
3. Violations of consent conditions have not been taken seriously by the Department of Planning in Sydney. Clearly this is in evidence in the paucity in the number of compliance reports and Penalty Infringement Notices since 2013. Excessive noise and breaches in the allowable number of persons on site is well known to the local community who have had to incur the impost. Enforcement of conditions is far too lax to have any faith in such in the future.
4. Ecological monitoring has not met the conditions of consent imposed by the PAC. Parklands claims that there has been no environmental impact on the site or the adjacent Billinudgel Nature Reserve. What is put aside by Parklands are some of the following:
  - (a) failure to make transparent, by refusing to answer questions on its wee and poo strategy. I am aware they are promoting composting toilets. They also use portaloos. In the former, what hard evidence can Parklands produce to show that screening for inorganic matter is in place before on site disposal?
  - (b) matter from portaloos is transported to West Byron Sewerage Treatment Plant. The receiving environment of that plant is in such a parlous state that a Clause 45 Sewage Moratorium is warranted. In the case of Parklands, as for the proposed West Byron Development, there is inadequate capacity for WBSTP to accept waste from the festival site. Flooding of private property adjoining the WBSTP with treated effluent at 3ML/day is on the public record. This is breach of conditions of operation of the plant with those private property owners.
  - (c) Parklands has acknowledged its concern, January 2017 at an on-site community meeting, about disposal of garbage/waste left on site by patrons.
  - (d) environmental vandalism is the only words one could use to describe the sale of plastic glitter as evident at Splendour 2017. It is common knowledge that these tiny bits of plastic, if not the same are similar, are an outright danger to the environment. In fact, I do recall there was move to prohibit their use in such things as body washing lotions because of their damaging and cumulative impact in the environment.
5. The NSW Police issued an alarming report following Splendour 2016. As they explained in a community meeting, they had raised the issues with the Parklands staff in the past about festivals but didn't see effective operational changes, so they issued a written, public report to list their

concerns. As the police said, the local command cannot provide sufficient police for the event and the local community during festivals, drugs and alcohol were again significant issues.

Internal roads are not sufficient for emergency access and lighting is insufficient. In addition, they mentioned grave concerns about internal traffic management and emergency evacuation, saying that during a festival the site could not be evacuated in 8 hours. Given the issues they raised, the appropriateness of Parklands as a festival site is highly questionable under any circumstances, even for festivals at current scale.

6. Byron Shire is a tourist mecca. Local residents, by default are wearing the cost of this market in a multiple of ways. The financial impost is clearly evidence in the condition of infrastructure. To have the proponent attracting the numbers of patrons without having to pay any contributions to Council is nothing less than outrageous and an affront to the local community. Extending the 5 year trial another 20 months and continuing to avoid any contribution to Council is unconscionable.

7. The Parklands site is an unsuitable site for festivals. To ignore how quickly it floods is a nonsense. Wet weather events are characteristic of this area. Their occurrence correlates with holiday periods during which time, festival events are favoured.