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**Subject:** PARKLANDS SUBMISSION - FINAL APPROVAL REQUESTS  
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PARKLANDS PROPOSAL is not fair to residents in its current form

My main concern is about sewerage and volumes of waste water entering our local waterways and ocean from a gatherings twice the population of the shire (30,000 residents, 15,000 rate payers)

We residents need to ask for

- restoration of local council monitoring of the site
- a proper sewerage treatment plan in consultation with the health department please
- some proper monitoring of what sort of culture will be allowed on the site -

It is possible for example, that the state government could approve of more permanent building accommodation (its gone from 60 guests to 180 in 5 years) than they have already approved - and the venue could become a casino which we know gives the state government plenty of revenue. At present state approval there are only composting toilets for the permanent tourist facility building, bar and venue and cabins. This is flood plain which washes into our river and ocean.

Over the 5 years to the last proposal - which the State Government Planning has accepted - the original numbers for festivals days and patrons, permanent tourist facility guests has nearly doubled.

The local council has no say with this anymore as it has been taken over by the State planning as a culturally significant site - with self monitoring by the commercial company Parklands only who got the development approved under the banner of culturally significant site.

In the area of sewerage disposal the health department have not been consulted by Parklands. In the area of historical cultural significance aboriginal heritage the site is hugely significant - especially the auditorium site apparently. At the IPC community meeting an aboriginal elder described the use of the land for festivals as the same as a dance party on the top of Uluru.

Parklands are a commercial company who wants to make profits of course - but please not at the expense of residents and ratepayers or at the expense of patron health and safety . The site is a huge concern for emergencies fire ambulance and waste, let alone terrorist dangers if there are large numbers of patrons.

An international US entertainment company already own 51% of the Parklands owners subsidiary company for Falls and Splendour festivals. (Live Nation)

re sewerage

\* The existing approval for the Parkland trial period, given in 2012, called for a full sewage treatment plant to be constructed on site by the end of the trial which is now. But that never happened. Parklands got permission from Council to install composting toilets and some septic tanks and they claimed that has taken the place of the required sewage treatment plant. At that time the permanent buildings were for 60 conference guests. Now it is 180 and the golden view bar permanent waste including sewerage. The proposal to date approves of treating the sewerage by being stored in dams, treated with chlorine and sprayed over fields and in irrigation channels. The independent reports on this system have not fully approved

\* Parklands say they just want to expand on that "low-tech" option for waste and sewerage. Parklands have apparently never consulted with the Department of Health about it. A commercial company would want to avoid having to build an actual sewage treatment plant because that would be quite expensive. The original proposal was for much fewer festivals, fewer days and fewer patrons ( half of what this final proposal states ).

\* Byron Council has said they will not be able to handle wastewater from Parklands any more. The effluent quality has been poor in the past, and Council's Sewage Treatment Plant is already overloaded most of the time anyway. What long-term agreement does Parklands have to use an STP outside the shire - like a signed contract - if their proposed on-site burying and spraying simply cannot work?

\* Parklands proposes spraying secondary-treated wastewater effluent of solid toilet waste, urine, hand basin water, shower grey water, and conference centre kitchen sullage onto an area on the north of the site. Drainage channels from the event and camping site flow north and north-east beneath Jones Road into the Billinudgel Nature Reserve. The flow then enters a pristine waterway and SEPP 14 wetlands, where there are three endangered ecological communities in the Billinudgel Nature Reserve. From there, the water flows right next to a Bora Ring site that is sacred to traditional custodians. The treatment-and-disposal plans for the on-site waste are not robust enough to ensure protection of these ecologically significant areas. Mooball Creek is also very likely to be affected by this waste disposal plan.

\* Parklands has underestimated the amount of waste that will be generated during festivals and during the use of the year-round conference centre/tourist facility and bar. They argue that many festival goers leave the site to visit nearby towns during the day and use the toilets there?

\* Whether or not Parklands will be able to safely dispose of its solid and liquid waste on site will depend on what the weather is like when they want to do the disposal. This area gets a great deal of rain every year, so the soil may well be waterlogged at the time they want to do the disposal. Also, they've said they won't dispose of the waste too close to scheduled events, further limiting the number of disposal days that are available. This is a serious uncertainty.

\* The much-lauded composting toilets get very low marks from many people who visit the site. A neighbour of mine attended the very small Fields of Healing festival (small numbers) at Parklands recently and said that the toilets were so disgustingly filthy that she could hardly use the facilities. I know that during festivals, many attendees simply use the bushes to avoid the toilets altogether. I'd like to know how this behaviour will be policed in future. The Department has said nothing about this, apparently because they have not checked the amenities blocks on the fourth day of a four-day festival. This is a major public health issue at each festival that no one seems willing to talk about. Any breakdown in the system will mean the ratepayers of byron shire will pay for a profit making company who by passed the local council to pay for any broken down treatment system for their permanent conference centre tourist facility and golden bar

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