

North Byron Parklands should not be given permanent approval to hold more festivals with increased numbers of attendees on the site.

Any increase in numbers of attendees and the number of festival days should not be allowed. The current approval maximum is already putting significant pressures on the environment and creating major problems for nearby residents. According to the NSW Police, the safety and security of attendees is also at risk with every festival. A maximum of 50,000 attendees and an increase in the number of festival days should NOT be approved. This is a completely unwarranted intensification of the development.

The threats to the ecology of the site and surrounds are significant: native species, including koalas, use Marshalls Ridge Wildlife Corridor, which bisects the site, and Billinudgel Nature Reserve sits right next door. Experienced ecologists have noted that the ecological monitoring to date has been too poorly designed and executed to yield meaningful conclusions. North Byron Parklands claim that no ecological impacts have occurred, but that would seem to be an optimistic conclusion. We simply don't know what effects this development has had on sensitive flora and fauna. Consent conditions should require properly designed and executed independent monitoring to determine the ecological impacts of the development.

Wastewater from toilets and food preparation is to be disposed of on site by burying and spraying. The risks to groundwater quality are great, as are the risks of polluting the water that flows from the site through sensitive ecological areas into Wooyung. Other aspects of the festival are also threats to the environment: the extreme noise from amplified music, constant noise from many large generators, people and vehicle movements, extensive parking lots, and the discarding of countless bits of debris on the site that is the result of tens of thousands of people milling about for days. Allowing all this to continue is unacceptable.

The North Byron Parklands property includes two sites that are sacred to the traditional owners of the land. The main stage is positioned on one of those sacred sites. A community member said holding a festival at North Byron Parklands is like holding a dance party on top of Uluru. The traditional owners have not been consulted about this proposal, have not given their consent, and are extremely disturbed that it has got this far.

A new gate to the property is proposed on Wooyung Road so that festival promoters can route traffic along the coast road through Pottsville, taking the pressure off the Pacific Highway. This will almost surely result in significantly increased traffic in the south of Tweed Shire during festivals. Pottsville has a narrow main street, incapable of taking any more traffic, it would be deleterious to the village of Pottsville to route traffic through the town.

The Regulatory Working Group needs to be chaired by an individual who is not connected to Parklands but rather who is accountable to the Department of Planning.

Also, Tweed Council should be represented on the Regulatory Working Group (as Byron Council is), and Community Representatives are needed from Tweed Shire as well as Byron Shire. Any approvals for ongoing activity on the site should be given by the local Councils whose residents are most affected (Byron and Tweed). That was the intention of the original Planning Assessment Commission, which approved a five-year trial. The restoration of local control is what needs to happen now. As Byron Councilor Cate Coorey said "it's really crucial that if there are to be festivals on that site, that there's rigorous oversight and monitoring." Byron Council already has to manage illegal offsite parking due to delays in exiting the site, a public health and safety risk, as well as the influx of festival patrons into surrounding areas many of which camp illegally.

Festival operations should be managed by licences issued by local authorities, in line with the music-festival licence that was recently proposed by the state government in the report "Keeping People Safe At Music Festivals" (October 2018). Such a licence would be renewable, subject to meeting specific conditions. This would allow local governments' control over what would be allowed on the site.

Independent compliance monitoring is needed with regard to noise, on-site camping, wastewater treatment, and other critical aspects of the development. This should be done collaboratively by Byron Council, Tweed Council, and the Planning Department's compliance division. North Byron Parklands' self-monitoring and self-reporting must be augmented by neutral, independent observers.

Live Nation, a US company, owns 51% of the two main festivals that are operated at Parklands (Splendour in the Grass and Falls). So Parklands is already supporting an overseas conglomerate with a market cap of US\$8.9 billion (as of June 2018). If this approval is given, we can expect many more Live Nation events at Parklands and more profits sent overseas.

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