From: [redacted]
To: IPCN Enquiries Mailbox; [redacted]
Subject: Community does not support North Byron Parklands dangerous and destructive plans.
Date: Wednesday, 28 November 2018 1:31:32 PM

I object to any further expansion of the North Byron Parklands events. The potential for harm to patrons and for damage to the environment is not worth the so-called economic benefits. The events produce only a few permanent positions - the rest are casual and only last the length of the events. The major festivals are majority owned by Live Nation, a US company that is under investigation by the Dept of Justice for serious violation of anti-trust laws.

- The current approval allows 10 event days for large, medium, and small music events and 10 days for non-music "minor community events" of up to 1,500 people.

The proposed usage has increased substantially and is now:
5 days for Splendour (35,000-50,000) instead of the usual 3 days
5 days for Falls (35,000) instead of the usual three days
3 days for other events up to 25,000 (could be three one-day events)
2 days for other events up to 5,000 (could be two one-day events)
2 days for non-music focused minor community events

This is a massive increase in use and flies in the face of the 2016 approved modification that was supposedly to allow for more "minor community events". Those 10 additional "minor community event" days have morphed into 8 additional big-festival days and only 2 "minor community event" days. This is a classic bait-and-switch move.

- The proposed modification (MOD3) to the Concept Plan regarding attendance should be rejected. The current ceiling of 35,000 is already creating serious safety, security, and residential amenity issues. The government should not set a significantly higher ceiling of 50,000 in the Concept Plan—the document that sets the parameters for the development.

- There are serious safety concerns about the site and the numbers. The NSW Police Force "remains gravely concerned regarding the possibility of a crowd crush incident occurring. During the 2018 Splendour festival, an incident took place during the Kendrick Lamar performance. This was described as a crowd collapse in front of the stage on flat ground which allegedly involved 100 patrons," according to their report to this proposal.

- "A social media celebrity (Shammi Prasad) was able to bypass event security by hiding in a wheelie bin and having a friend (dressed as groundsman) wheel the bin into festival grounds … if event security can be breached with relative ease, NSWPF have concerns for the safety of festival attendees." – NSW Police Force report on the proposal.

- "NSWPF also holds concerns regarding the current level of medical resources allocated by Splendour. During the 2018 Splendour Festival, NSWPF detained an individual who was under the influence of drugs and had a history of mental illness. NSWPF attempted to arrange for an ambulance to transport the individual to hospital, but were advised that there would be a wait time of 45 minutes before an ambulance would become available." – NSW Police Force report.

- Police reported 148 drug charges at Splendour in the Grass this year. 115 people were issued Field Court Attendance Notices for 148 drug offences, including two people charged with supplying a prohibited drug. A 25-year-old man was allegedly found in possession of 57 MDMA tablets and cash. He was charged with possess prohibited drug, supply prohibited drug and deal with proceeds of crime. He was refused bail to face Tweed Heads Local Court today (Monday 23 July 2018). Police also issued 38 cannabis cautions and five youth cautions.

- The site is constrained by a range of natural hazards, it is not serviced by reticulated water or sewer and adjoins Coastal Wetlands, the Billinudgel Nature Reserve and other areas of high value vegetation.

- Waste management for the site has been negatively critiqued by Byron Shire Council. The report refers to liquid waste being trucked from Parklands to Byron Shire Council STP – it is not identified which STP but it was West Byron STP last time. The amount of liquid waste (almost double the water of the entire Shire population) would exceed the EPA license limits of the treatment facility.

- A recommendation is for NBPL to to make a substantial contribution to the expansion of the STP, yet Parklands does not have the right to determine Council's sewerage policy on whether or not to change the capacity of its STPs. Both West Byron and Brunswick Valley STPs are biological reduction treatment plants. As such they cannot be 'expanded' or 'upgraded'. Instead, Council would be looking at building new STPs.

- I object to the proposed staged increase in attendance that is conditional on meeting a very limited number of KPIs. This is not an example of “the precautionary principle” as the Department of Planning claims. We object to any increase in attendance numbers, event days, or types of festivals beyond what has already been approved.

- Independent oversight is needed. The Regulatory Working Group needs to be an independent body that is not controlled by Parklands in the way that has occurred during the trial. The RWG should be chaired by an individual who is appointed by Byron and Tweed Councils, who has no connection to Parklands, who remains in close touch with both councils, and who reports directly to the Department of Planning (as the consent authority). The RWG should also include representatives from Tweed Council as well as Byron Council and it should include at least two community representatives from each shire.

- The Department of Planning is recommending that Parklands’ self-monitoring of compliance should continue, but that needs to be augmented with strict independent compliance monitoring that is done collaboratively by the Department of Planning, Byron Council, and Tweed Council. Keeping the councils at bay, as has happened during the trial, has to stop. The Councils need to be involved in doing their own monitoring of noise, traffic, and residential amenity issues, and that monitoring needs to be used as part of the Planning Secretary’s ongoing assessment. The additional costs for council monitoring should be borne by Parklands.

- Consent conditions should include specific KPIs related to environmental impacts. Parklands says the festivals cause no impacts or only minor impacts, but experienced ecologists have found serious flaws in Parklands’ ecological monitoring. The Planning Department has ignored the criticisms and has accepted Parklands’ assurances that no one should be worried about ecological impacts. Meanwhile, plastic glitter, discarded trash, and human waste pile up with each festival.

- The Department of Planning commissioned an independent assessment of Parklands’ economic benefits report. That assessment dismissed the concern that most of the festival profits go overseas, claiming that Parklands is Australian owned. That assessor clearly doesn’t understand that Parklands does not own the festivals. Live Nation, an American company who owns TicketMaster, is the majority owner of Splendour and Falls and thus reaps the majority of festival revenues. Live Nation may well be the 100% owner of other events that could be staged at Parklands if this proposal is approved, so the concern that this approval will just line the pockets of overseas firms is quite real and should not be ignored by the Independent Planning Commission.

Thank you for listening to our community.
Regards,

Christine Bush

Sent from my iPhone