

North Byron Parklands Cultural Events Site – Camping Modification **Statement of Environmental Effects**

September 2020





Prepared for:



North Byron Parklands
126 Tweed Valley Way
Yelgun NSW 2483

Prepared by:



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striving for balance between economic, social and environmental ideals...

PJEP Ref: North Byron Parklands_SEE_Sept20.docx

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DISCLAIMER

This document was prepared for the sole use of North Byron Parklands and the regulatory agencies that are directly involved in this project, the only intended beneficiaries of our work. No other party should rely on the information contained herein without the prior written consent of PJEP Environmental Planning, PLANNERS NORTH and North Byron Parklands.



EXECUTIVE SUMMARY

North Byron Parklands (Parklands) operates a cultural events site at Yelgun near Byron Bay. The site is home to two of Australia's most iconic annual international cultural music festivals, Splendour in the Grass and the Falls Festival Byron.

The cultural events site operates under a concept plan approval granted by the former Planning Assessment Commission in 2012 (MP 09_0028), as well as a State Significant Development consent granted by the NSW Independent Planning Commission on 13 March 2019 (SSD 8169).

Amongst other things, the approvals allow Parklands to undertake outdoor cultural events on the site for up to 20 event days per year, including:

- 2 large events up to 5 event days each, including:
 - a large winter event (ie. Splendour), with up to 50,000 patrons per day; and
 - a large summer event (ie. Falls), with up to 35,000 patrons per day;
- 3 medium event days, with up to 25,000 patrons per day;
- 5 small event days, with up to 5,000 patrons per day; and
- 2 minor community event days, with up to 1,500 patrons per day.

The approvals also allow:

- temporary camping associated with outdoor events, with capacity for up to 30,000 campers a day (for certain events);
- development of a conference centre and associated accommodation, with capacity for up to 180 attendees and accommodation for up to 120 guests a day;
- continued use of existing site infrastructure and facilities;
- development of additional site infrastructure and facilities, including:
 - an administration building and golden view bar;
 - event area facilities and works;
 - on-site and off-site road and transport facilities and works; and
- continued habitat restoration and vegetation management works.

As part of the evolution of the two large festivals and their commitment to broadening their appeal to a wider demographic, additional attractions, activities and experiences are continually being added to the events. As an example, over recent years Splendour has introduced a number of new attractions including the Global Village, Bohemian Lounge, Little Splendour, Comedy Club, The Science Tent, and Splendour Arts.

Each of these attractions require anywhere from 600 to 6,000 square metres of space within the approved event area. The net result of accommodating these additional activities is a corresponding reduction in the available area set aside for camping.

To accommodate the expanded attractions and provide additional area for the amenity of campers, Parklands is proposing to expand the existing campgrounds into the northern part of the Parklands site, immediately adjacent to the existing campgrounds. The proposed expansion area comprises an area of predominately cleared broad acre agricultural land, and is currently used as a bushfire emergency assembly area for events on the site.

The proposal would increase the size of the existing 139 hectare event area by approximately 31 hectares (18% increase), with the expansion area to be used for camping purposes only. The bushfire emergency assembly area would be relocated to a cleared area to the east of the expanded camping area.

The proposal does not involve any change to the approved events, patron numbers or camper numbers for the site.



Parklands has undertaken a detailed assessment of the environmental, social and economic issues associated with the proposed modification.

With regard to noise, the assessment indicates that the expanded camping area would comfortably comply with applicable noise criteria at all surrounding sensitive receivers, with the exception of minor exceedances (ie. less than 1dB) at two residences which have ongoing noise agreements with Parklands.

With regard to flooding, Parklands has updated the approved Flood Risk Management Plan to incorporate the expansion of the campgrounds. The overall risk profiles have not changed from the existing approved plan, and the proposed expansion area would be in similar proximity to flood-free land (including the flood evacuation area and northern access road) as the existing campgrounds.

With regard to bushfire, the Bushfire Emergency Evacuation Plan has been updated to reflect the expanded campground. This has identified a number of strategically beneficial fire management measures resulting from the proposed modification, including increased camping space per person and improved evacuation pathways and access to the bushfire emergency assembly area.

With regard to traffic, the assessment indicates that the proposed expansion of the camping area would have negligible impact on existing traffic and transport associated with the site. This is primarily because the proposal would not change the overall number of trips or how the patrons arrive and depart the site. The additional camping area and associated event laneways would improve onsite queuing capacities, which has the potential to reduce offsite traffic impacts.

With regard to wastewater management, Parklands proposes to maintain the existing arrangements, which include a combination of onsite treatment (via the approved greywater management system) and disposal offsite to licensed wastewater treatment plants (with no disposal to council owned sewage treatment plants). No additional permanent wastewater infrastructure is proposed to be installed in the campground expansion area.

In summary, environmental assessment indicates that the proposed modification would involve minimal environmental impact, and that the modified North Byron Parklands project would remain substantially the same as the approved project. The primary effect of the proposed modification is an expansion of the footprint of the existing campgrounds to allow a corresponding growth in the event area attractions, and to improve patron and camper amenity and safety.

Importantly, the proposal is able to be undertaken in a manner that is consistent with the applicable environmental planning instruments and the character of the locality. Further, the North Byron Parklands site fulfils an important cultural and social need, helping to cement Byron's image as an iconic centre for the arts, music, entertainment and culture.

Accordingly, it is considered that the proposed expansion of the North Byron Parklands campgrounds represents the continued orderly use and development of the land. It is respectfully requested that the Minister or his delegate, having due regard for the information submitted in this Statement of Environmental Effects, grants approval to the proposed modification.



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1 INTRODUCTION

1.1 Overview

North Byron Parklands (Parklands) operates a 485 hectare cultural events site at Yelgun, approximately 22 kilometres north of Byron Bay on the North Coast of NSW (see **Figure 1**). The venue is home to two of Australia's most iconic annual international cultural music festivals, Splendour in the Grass (Splendour) and the Falls Festival Byron (Falls).

The cultural events site currently operates under a concept plan approval granted by the NSW Planning Assessment Commission in 2012, as well as a development consent granted by the Independent Planning Commission (the Commission) dated 13 March 2019.

Parklands is proposing to modify the concept plan approval and development consent to allow an expansion to the footprint of the existing camping area on the site. The proposal does not involve any change to the maximum approved number of campers on the site, or to the approved numbers of patrons associated with events on the site.

This Statement of Environmental Effects (SEE) has been prepared by PJEP Environmental Planning Pty Ltd (PJEP) and Planners North on behalf of North Byron Parklands, to assist the consideration of the proposal under the *Environmental Planning and Assessment Act 1979* (EP&A Act).

1.2 History of Parklands

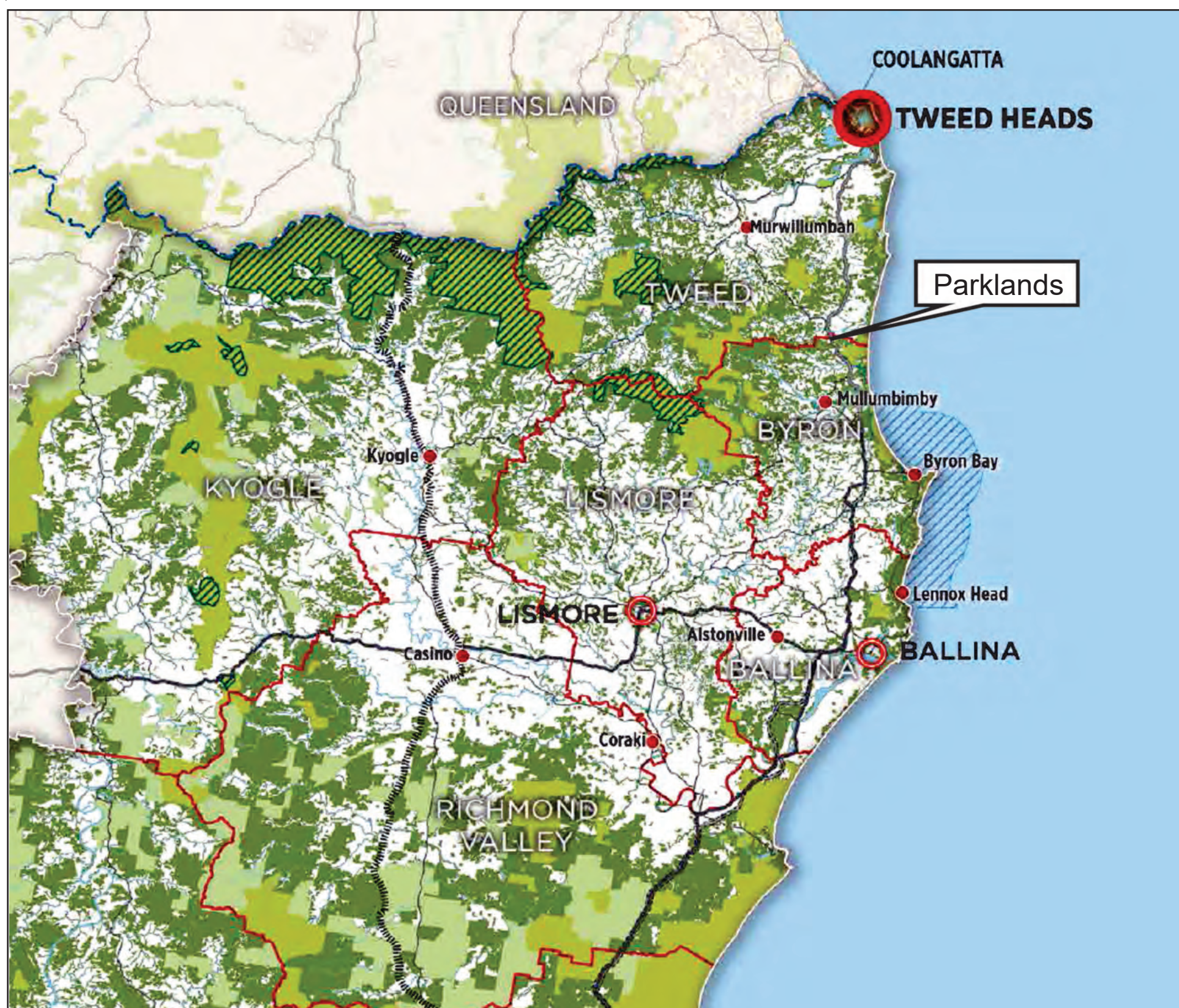
Splendour and the Falls Festival are two of the world's best known cultural music festivals. Splendour has been run annually since 2001, with the first 9 festivals held at Belongil Fields outside of Byron Bay. Falls started in 1993 in Lorne Victoria and expanded to Byron Bay in 2013.

On 24 April 2012, the then Planning Assessment Commission approved a concept plan and project application from Parklands under the former Part 3A of the EP&A Act, for the use and development of the North Byron Parklands site for cultural events. Whilst the concept plan approval allows the ongoing use of the site for cultural events, the original project approval was granted on a trial basis, with the project approval (as modified) allowing events up to the end of August 2019.

In 2017 Parklands lodged a State Significant Development application under Part 4 of the EP&A Act, to allow the ongoing use and development of the cultural events site after the end of the trial period. On 13 March 2019, the NSW Independent Planning Commission (the Commission) approved the development application (SSD 8169).

Amongst other things, the new development consent allows Parklands to undertake outdoor cultural events on the site for up to 20 event days per year, including:

- 2 large events up to 5 event days each, including:
 - a large winter event (ie. Splendour), with up to 50,000 patrons per day; and
 - a large summer event (ie. Falls Festival), with up to 35,000 patrons per day;
- 3 medium event days, with up to 25,000 patrons per day;
- 5 small event days, with up to 5,000 patrons per day; and
- 2 minor community event days, with up to 1,500 patrons per day.



















 Regional City	 Railway	 Proposed Highway Upgrade Corridor	 World Heritage Area
 Regional Centre	 Motorway	 Potential High Environmental Value	 National Park
 Town / Village	 State Highway	 Commonwealth Marine Park	 State Forest
 LGA Boundary	 Regional Road	 NSW Marine Park	 Watercourse



Figure | 1
Regional Context



The approval also allows:

- temporary camping associated with outdoor events, with capacity for up to 30,000 campers a day (for certain events);
- development of a conference centre and associated accommodation (as per the approved concept plan), with capacity for up to 180 attendees and accommodation for up to 120 guests a day;
- continued use of existing site infrastructure and facilities;
- development of additional site infrastructure and facilities, including:
 - an administration building and golden view bar;
 - event area facilities and works, including:
 - amphitheatre regrading works;
 - drainage improvements;
 - potable water infrastructure;
 - sewerage infrastructure and amenities;
 - electrical and telecommunications infrastructure¹;
 - security fencing;
 - on-site and off-site road and transport facilities and works; and
- continued habitat restoration and vegetation management works.

The consent provides for the staged increase in patronage for the large winter event (Splendour) and large summer event (Falls Festival) subject to meeting certain performance criteria. The progressive staging is outlined in the following table:

Table 1: Progressive Staging for Large Events

Event	Maximum Number of Patrons		
	Stage 1	Stage 2	Stage 3
Large Winter Event	35,000 patrons	42,500 patrons	50,000 patrons
Large Summer Event	25,000 patrons	30,000 patrons	35,000 patrons

Since the granting of the development consent, both events have now been approved for Stage 3 patron capacities based on their respective Performance Evaluation Reports.

The concept plan approval has been modified on three occasions under Section 75W of the EP&A Act since the original approval, including:

- MOD 1 – approved by the Commission on 22 April 2016. This modification to the concept plan and trial period project approval involved changes to noise management conditions, approval for up to 10 minor community events per year (with up to 1,500 patrons), and various administrative amendments;
- MOD 2 – approved by the Commission on 12 September 2017. This modification to the concept plan and trial period project approval extended the trial period by an additional 20 months, to 31 August 2019. The modification did not involve any other changes to either the concept plan or project approval, including event days and patron numbers; and
- MOD 3 – approved by the Commission on 13 March 2019. This modification involved changes to the concept plan approval to be consistent with the 2019 development consent, including an increase in maximum patron numbers and administrative changes to reflect the permanent cultural events site.

The current development consent has been modified once under Section 4.55(1A) Part 4 of the EP&A Act since the original approval, as follows:

- MOD 1 – approved by Commission on 17 September 2019. This modification involved amending the consent to allow the staged progression of the large summer event in a similar manner as the large winter event, and remedying an administrative issue raised by NSW Health regarding potable water conditions in the consent.

¹ For the conference centre and associated buildings



1.3 Events Conducted to Date

Since the original concept plan and project approvals, North Byron Parklands has invested over \$28 million to develop the Parklands site.

Parklands has now held a total of 13 large events under the previous project approval and recently approved development consent, including seven Splendour events and six Falls Festival events. Regrettably, Splendour in the Grass 2020 has been postponed until July 2021 due to the coronavirus pandemic. A number of other small community events have also been held on site. **Table 2** outlines the large events that have occurred to date.

The events are subject to a comprehensive suite of environmental, health and safety (EH&S) management, monitoring and reporting requirements, and consultation with key stakeholders.

Table 2: Events Held To Date

Event	Event Name	Date	Permitted Patrons	Event Days¹
1 st Event	Splendour 2013	Jul 13	25,000	4
2 nd Event	Falls Festival 2013	Dec 13 - Jan 14	15,000	4
3 rd Event	Splendour 2014	Jul 14	27,500	4
4 th Event	Falls Festival 2014	Dec 14 - Jan 15	17,500	4
5 th Event	Splendour 2015	Jul 15	30,000	4
6 th Event	Falls Festival 2015	Dec 15 - Jan 16	20,000	4
7 th Event	Splendour 2016	Jul 16	32,500	4
8 th Event	Falls Festival 2016	Dec 16 - Jan 17	22,500	4
9 th Event	Splendour 2017	Jul 17	32,500	4
10 th Event	Falls Festival 2017	Dec 17 - Jan 18	25,000	4
11 th Event	Splendour 2018	Jul 18	35,000	4
12 th Event	Falls Festival 2018	Dec 18 - Jan 19	25,000	4
13 th Event	Splendour 2019	Jul 19	42,500	4
14 th Event	Falls Festival 2019	Dec 19 - Jan 20	30,000	4

¹ Event days do not include bump-in and bump-out days that occur on both sides of an event for the assembling and dismantling of temporary infrastructure. The development consent allows up to 21 bump-in days and 14 bump-out days per event.

In addition to these large events, 2 small and 4 minor community events (involving food fairs and primary school cross country events involving more than 10 north coast schools with approximately 820 school children and parents) were held on the site between June 2016 and February 2020.



2 THE SITE

2.1 Location and Context

The Parklands site is located on the NSW far north coast, approximately 22 kilometres north of the Byron Bay town centre and 35 kilometres south of Tweed Heads, in the Byron local government area. The site also involves a small amount of development, including the northern access road and bushfire emergency assembly area, within the Tweed local government area (see **Figure 2**).

The site is located directly to the east of the Pacific Motorway (M1 Motorway) and Tweed Valley Way, the latter of which provides primary access to the site. Tweed Valley Way is a 2-lane regional road that provides efficient access to the Pacific Motorway via the Yelgun Interchange, located approximately 1 kilometre south of the site. Additional highway interchanges are located at Brunswick Heads further to the south of the site, and Cudgera Creek to the north of the site.

The site is physically divided into two main areas to the north and south of Jones Road and Marshalls Ridge, which traverse through the central portion of the site on an east-west alignment.

2.2 Site Description and Ownership

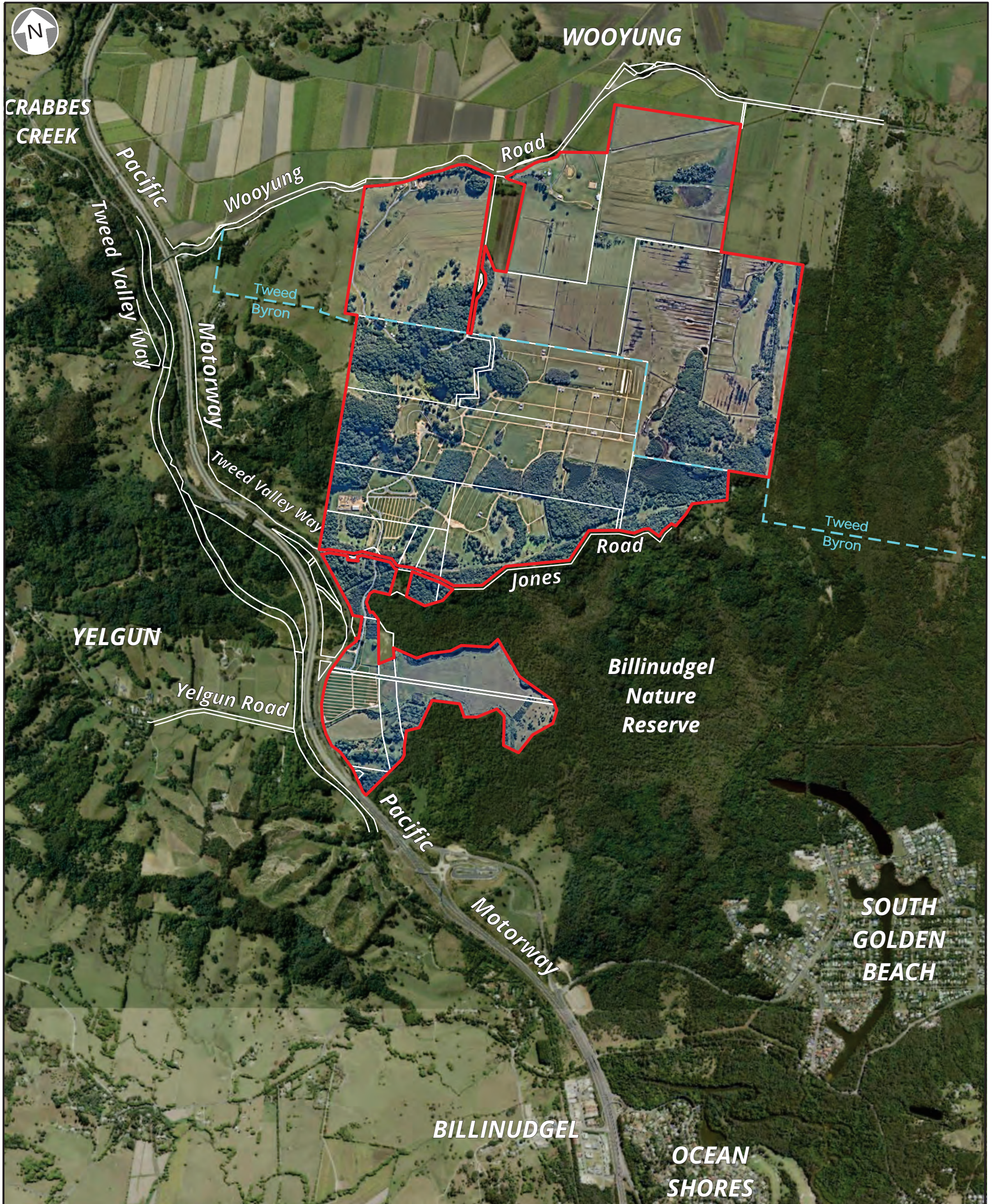
The approved Parklands site, prior to a recent NPWS land dedication had a total area of 521.74 hectares, as shown on **Figure 3.1**.

As agreed with NPWS, Parklands has now enacted a land swap process involving the transfer of approximately 37 hectares of Parklands' land to NPWS for conservation purposes. This land was formally transferred in March 2020, in accordance with a Heads of Agreement dated 28 April 2018. As shown in **Figure 3.2**, the current total site area post this transfer is 484.79 hectares.

The core event areas currently comprise a total of approximately 139 hectares.

The proposed expanded camping area is located within Lot 4 in DP 821947, Lot 11 in DP 1192842 and Lot 34 in DP 755721 as shown on **Figure 3.2**. The proposed expansion has an area of approximately 31 hectares.

NPWS is currently finalising the transfer of 3 parcels of land totalling 7.26 hectares to Parklands. This final component of the land swap is expected to take place by September 2020.



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Legend:

- Parklands site
- Tweed/Byron Shire boundary



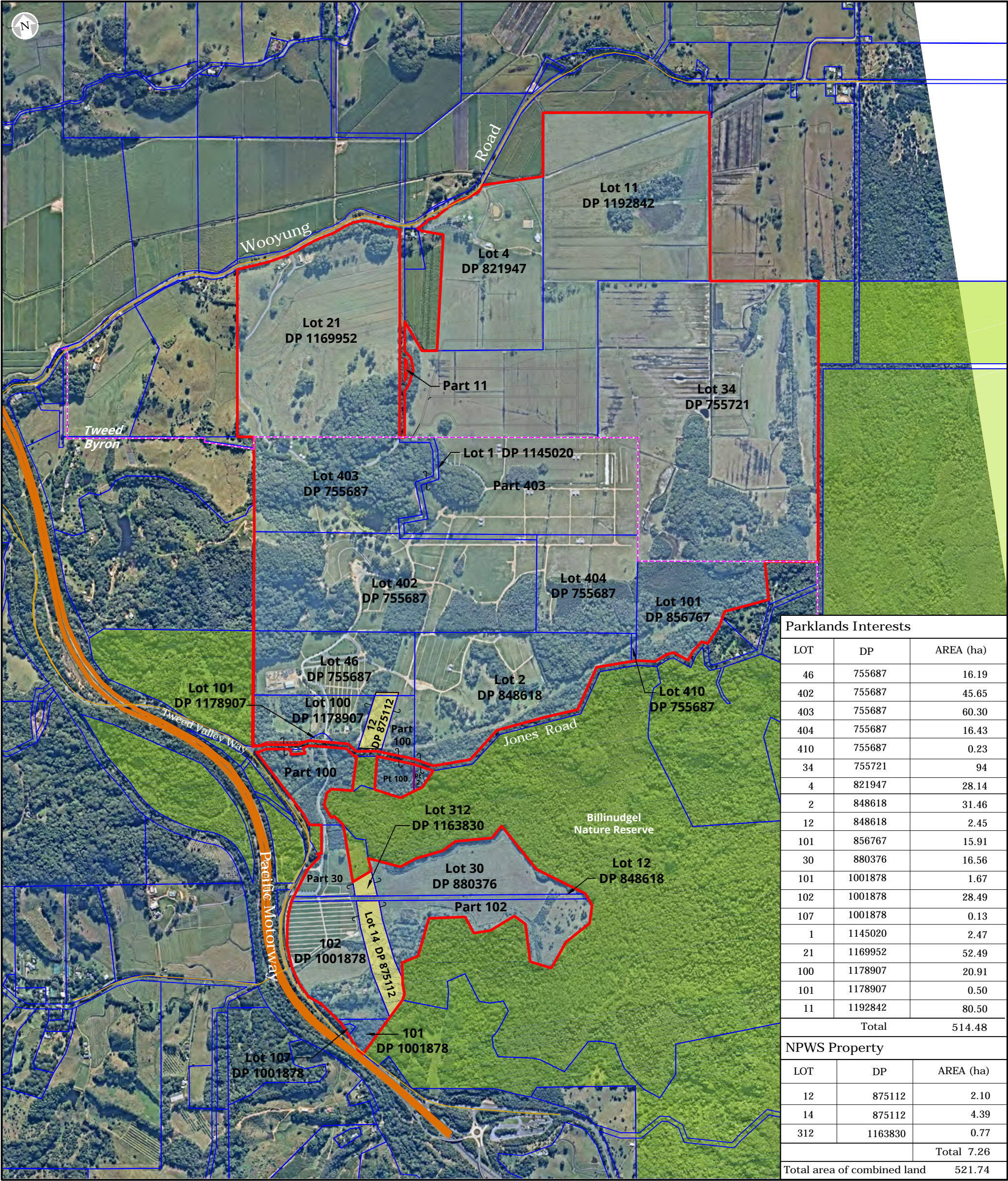
Date September 2020
Author Planners North
Reference 1287.3374

IMPORTANT NOTE |
Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only.
Sources | Site Aerial Photography: Nearmap (June 2020)
| Cadastral: Ardill Payne (2009) Updated 2017

Prepared by
Originally - design team ink
azaCAD
Updated - Planners North

Figure | 2
Locality Plan

North Byron Parklands | Tweed Valley Way & Jones Road



Parklands Interests		
LOT	DP	AREA (ha)
46	755687	16.19
402	755687	45.65
403	755687	60.30
404	755687	16.43
410	755687	0.23
34	755721	94
4	821947	28.14
2	848618	31.46
12	848618	2.45
101	856767	15.91
30	880376	16.56
101	1001878	1.67
102	1001878	28.49
107	1001878	0.13
1	1145020	2.47
21	1169952	52.49
100	1178907	20.91
101	1178907	0.50
11	1192842	80.50
Total		514.48
NPWS Property		
LOT	DP	AREA (ha)
12	875112	2.10
14	875112	4.39
312	1163830	0.77
		Total 7.26
Total area of combined land		521.74

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Site Address: Tweed Valley Way and Jones Road, Wooyung
Locality: Wooyung, Yelgun, Ocean Shores
Local Government Area: Byron & Tweed Shires
Parish: Billinudgel
County: Rous

- Legend:
- Parklands site
 - Property boundary
 - Tweed/Byron Shire boundary

- Parklands interests
- NPWS ownership
- Billinudgel Nature Reserve



Date	Sept. 2020
Author	Planners North
Reference	1287.3374

IMPORTANT NOTE | Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only.
Sources | Aerial Photography: Nearmap (June 2020) | Cadastral: Byron DCDB 2015, updated 2020 | Cadastral Descriptions: NSW LPI (Aug. 2020) |

Prepared by
Originally - design team ink
Updated - Planners North

Figure | 3.1
Cadastre
Before Dedication
North Byron Parklands | Tweed Valley Way & Jones Road



2.3 Land Use

The approved Land Use Structure Plan and Ecological Structure Plan for the Parklands site are reproduced on **Figures 4** and **5** respectively.

As shown on the plan, land use within the main part of the Parklands site is divided between the predominately cleared ‘core event and conference centre use areas’ (core event area), and habitat protection and establishment areas which are managed in accordance with the approved flora and fauna management plans for the site.

The primary land uses within the core event area include:

- car parking areas;
- event and camping areas;
- conference centre; and
- ancillary infrastructure areas.

Whilst the approved land use plan does not currently include detail on land use in the northern parts of the Parklands site, these areas accommodate the bushfire emergency assembly area to the north of the event area, and the northern access road to Wooyung Road.

2.3.1 Car Parking

The parking of cars across the site is determined based on whether the patron is a ‘camping’ or ‘day’ patron. Those day patrons that elect not to use the extensive public transport network and travel by private vehicle to the site must purchase a parking ticket, and park in the dedicated car parks.

Patrons that have purchased a camping ticket are required to park their vehicle in predetermined rows within the event area, in proximity to the camping areas.

2.3.2 Event and Camping Area

The event area as defined on the approved land use structure plan denotes land where the event infrastructure (stages, temporary structures, food and markets, etc) can be located, and where camping can occur.

Camping areas are typically located in the north-eastern corner of the event area, and immediately north of Jones Road.

Campers are accommodated on site in tents and movable dwellings such as camper vans, which are either supplied by event organisers or brought onto site by campers themselves. The existing campgrounds include a number of amenities buildings which include toilet and shower facilities.

Condition D2 of the development consent restricts the maximum number of campers to:

- 30,000 campers during the large summer event (Falls Festival);
- 25,000 campers during the large winter event (Splendour) and medium events;
- 5,000 campers during a small community event; and
- 1,500 campers during a minor community event.

Camping is permitted on event days and for up to one day prior to and one day after event days.

Each event determines the size of land required for festival infrastructure based on the number of patrons attending the event, infrastructure requirements and areas required for various attractions and experiences (eg. science tent, art installations, etc). As patron numbers increase, so does the footprint required for festival infrastructure, attractions and patron circulation areas. Conversely, as



the festival infrastructure footprint increases, this necessitates a corresponding reduction in the event area available for camping.

As part of the evolution of these two festivals and their commitment to broadening their appeal to a wider demographic, additional attractions, activities and experiences are continually being added to these events as they grow. As an example, over recent years Splendour has introduced the following additional attractions:

- Global Village – world music, acrobatics, yoga, etc;
- Bohemian Lounge – poetry, chi tea, burlesque dancing, etc;
- Little Splendour – for kids including crafts, theatre, circus performers, magic shows, etc;
- Comedy Club – featuring up and coming comedians;
- Science Tent – featuring science experiments and talks by some of the country's finest scientists;
- Splendour Arts – showcasing performance, installation, sculpture, lighting and painting;
- Rainbow Bar – acknowledging the vibrant LGBTIQ community; and
- Temperance Bar – an alcohol-free bar serving a range of non-alcoholic drinks and beverages.

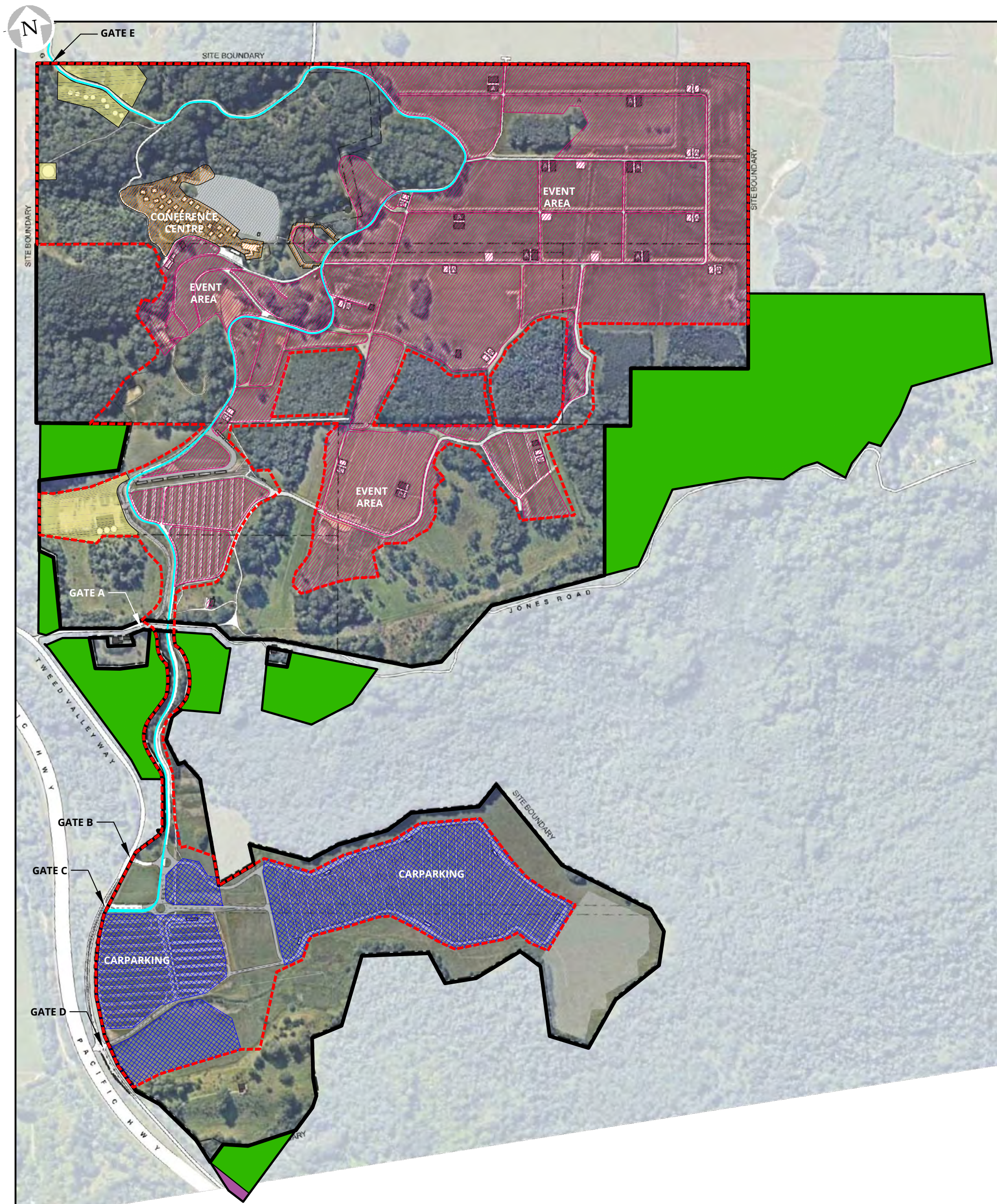
Each of these attractions require anywhere from 600 to 6,000 square metres of space within the event area. The net result of accommodating these additional activities is a corresponding reduction in the available area set aside for camping.

The proposed modification is intended to address this issue, by expanding the camping area to the north of the existing northern campground. The proposal does not involve any change to the approved number of campers or patrons for the events.

2.3.3 Conference Centre

The concept plan and development consent allow for the construction and operation of a conference centre in a north-west area of the site (refer **Figure 4**). The construction of this facility forms part of the approved Infrastructure Staging Plan.

Parklands is currently seeking expressions of interest from conference centre investors to build and operate the approved conference centre facility.



0 150m
1:8000 (@ A3)



Date	September 2020
Author	Planners North
Reference	1287.3374

Legend:

- Parklands site
- Core event & conference centre use areas

- Parklands Drive
- Active event access lane

- Land dedicated to NPWS
- Proposed road reserve widening
- Proposed event & camping use area

- Carparking
- Conference centre precinct
- Infrastructure

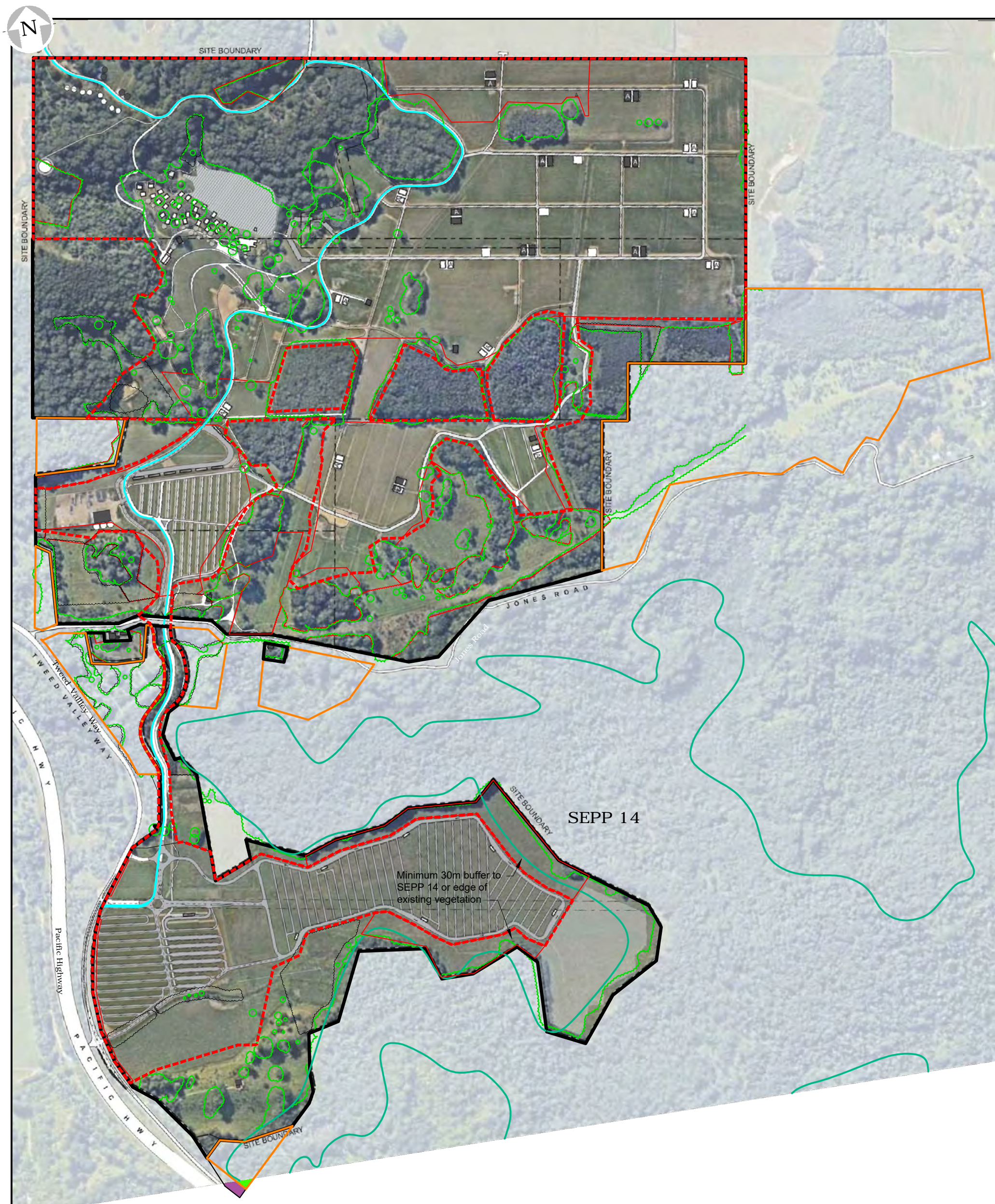
IMPORTANT NOTE |
Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only. This plan is conceptual only and subject to detailed survey and design.

Sources | Aerial Photography: Nearmap (July 2017) | Cadastre: Ardill Payne (2009) Updated July 2017 |

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Updated - Planners North

Figure | 4
Approved Land Use
Structure Plan

North Byron Parklands | Tweed Valley Way & Jones Road



0 150m
1:8000 (@ A3)

Legend:

Parklands site

Core event & cultural centre use areas

Parklands Drive



Existing vegetation to be protected



Habitat management



Managed parkland



SEPP 14 Wetlands



Land to be dedicated to NPWS



Proposed road reserve widening



Date	November 2017
Author	Planners North
Reference	1287.1694

IMPORTANT NOTE | Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only.

Sources | Aerial Photography: Nearmap (July 2017) | Cadastre: Ardill Payne (2009) Updated 2017 | Ecological Values: Mark Fitzgerald (2015) Updated 2017

Prepared by

Originally - design team ink
Updated - Planners North

Figure | 5
Approved
Ecological Structure Plan

North Byron Parklands | Tweed Valley Way & Jones Road



3 PROPOSED MODIFICATION

3.1 Overview

Parklands is proposing to modify the concept plan approval and development consent for the North Byron Parklands cultural events site, to allow event camping in the northern area of the site, immediately to the north of the existing event area.

The proposal would involve the construction of a number of access roads and minor drainage works, as well as the relocation of the existing bushfire emergency assembly area immediately to the east of the expanded camping area.

All event infrastructure such as toilets and showers in the expanded camping area would be installed on a temporary basis and removed following each event.

The modification does not involve any increase to currently approved patron capacities or camping numbers on the site.

The proposed modification would require amendment to the approved Land Use Structure Plan and Ecological Structure Plan for the Parklands site, to identify the expanded camping area. The amended plans are shown on **Figures 6 and 7** below, and attached in **Appendix A**.

3.2 Camping Area Expansion

The modification seeks to expand the approved core event area from 139 hectares to 170 hectares (an increase of approximately 18%), by extending the existing campgrounds immediately north of the current event area, within the wider Parklands site. The expanded area would be used for event-related camping purposes only.

The land proposed for the camping expansion (31 hectares) is currently used predominately for broad acre agriculture (cattle grazing), and would continue to be used for this purpose outside of event days.

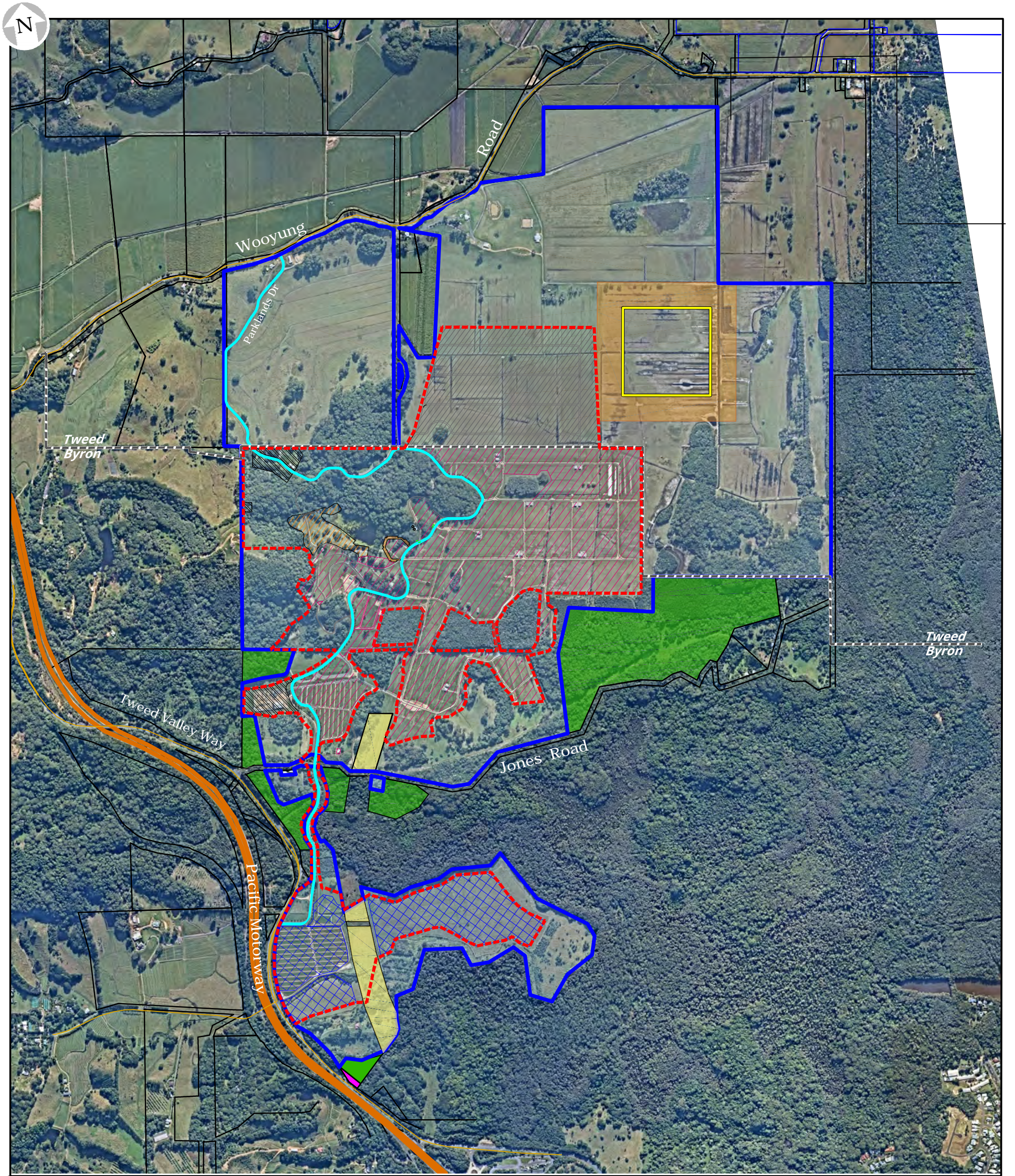
The infrastructure required for the camping area expansion would comprise a series of 6 metre wide gravel laneways that would connect to the existing venue road network. A number of drain crossings would also be installed as required. The proposed works are shown on **Figure 8**, and on the civil design plans in **Appendix B**.

The infrastructure works would be undertaken prior to using the additional camping area for camping.

No other infrastructure of a permanent nature is proposed, and no works outside the site are required.

As with the existing campgrounds, campers would be accommodated on site in tents and movable dwellings such as camper vans, which would be either supplied by event organisers or brought onto site by campers themselves.

All toilets, showers, water tanks and lighting towers required to service the expanded camping area would be installed on a temporary basis during each event. That is, the facilities would be installed during the bump-in period and removed during the bump out period.



0 400m
1:15 000 (@ A3)

Legend:

- | | | | |
|--|---|--------------------------|----------------------------|
| Parklands site | Bushfire Emergency Assembly Area | Land dedicated to NPWS | Carparking |
| Core event & conference centre use areas | APZ for BEAA | Road reserve widening | Conference centre precinct |
| Parklands Drive | Surplus NPWS land to be passed to Parklands | Event & camping use area | Infrastructure |
| Event access lanes | Camping Only Area | Shire boundary | |



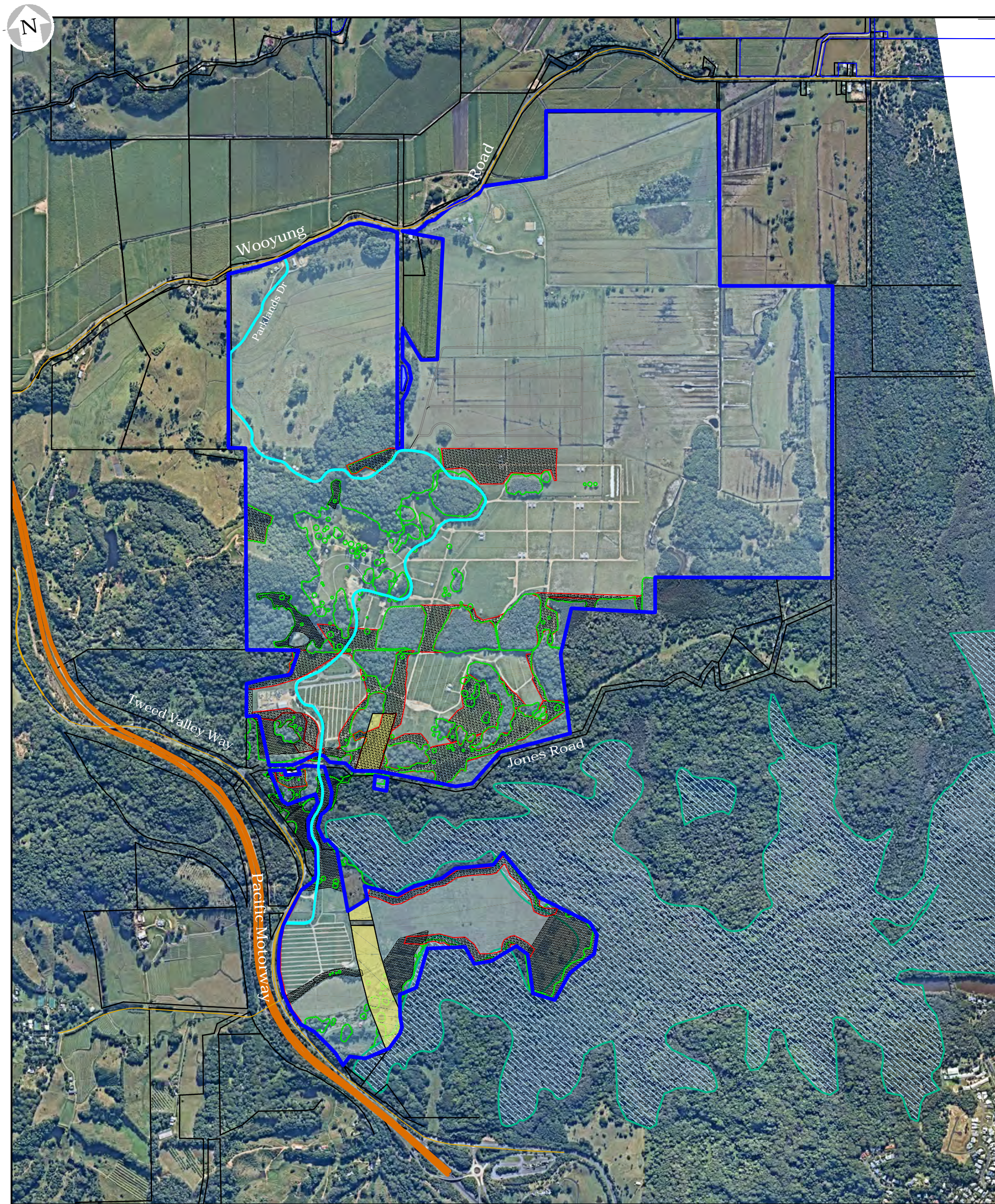
Date	September 2020
Author Reference	Planners North 1287.3374

IMPORTANT NOTE |
Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only. This plan is conceptual only and subject to detailed survey and design.

Sources | Aerial Photography: Nearmap (June 2020)
| Cadastre: Ardill Payne (2009) Updated Aug 2020 |

Prepared by
Originally - design team ink
azaCAD
Updated - Planners North

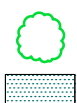
Figure | 6
Proposed Land Use Structure Plan
North Byron Parklands | Tweed Valley Way & Jones Road



0 400m
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Legend:

- Parklands site
- Parklands Drive



Existing vegetation to be protected



Habitat management



Managed parkland



SEPP 14 Wetlands



Surplus NPWS land to be passed to Parklands



Date	September 2020
Author	Planners North
Reference	1287.3374

IMPORTANT NOTE | Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only.

Sources | Aerial Photography: Nearmap (June 2020)
| Cadastre: Ardill Payne (2009) Updated 2017, 2020
| Ecological Values: Mark Fitzgerald (2015) Updated 2017

Prepared by

Originally - design team ink
Updated - Planners North

Figure | 7
Proposed Ecological Structure Plan



The modification does not involve any change to the approved:

- maximum camper numbers for each event;
- maximum patrons for each event;
- number of event days per annum; or
- number of camping days, with campers permitted on site on event days and shoulder days (ie. one day prior and one day after event days) only.

The existing 5 ha bushfire emergency assembly area, which is currently located within the footprint of the proposed expanded camping area, would be relocated immediately to the east of the camping expansion area, maintaining significant buffer distances to stands of vegetation. No significant works are required for the assembly area, apart from continued mowing and temporary event-based infrastructure (eg. signage and fencing as required).

3.3 Environmental Management Plans

In accordance with Conditions E2 and E3 of the development consent, the following existing management plans would be reviewed, and if necessary revised, to accommodate the proposed expansion to the camping area:

- Fire Management Plan (Condition B13);
- Bushfire Emergency Evacuation Plan (Condition B15);
- Infrastructure Staging Plan (Condition C2);
- Construction Environment Management Plan; (Condition C4);
- Construction Traffic Management Plan (Condition C7);
- Waste Management Plan (Condition C17);
- Event Management Plan, including the Camping Management Plan (Condition D25);
- Traffic Management Plan (Condition D27);
- Noise Management Plan (Condition D34);
- Social Impact Management Plan (Condition D36);
- Koala Plan of Management (Condition D39);
- Flora and Fauna Monitoring and Adaptive Management Plan (Condition D40);
- Billinudgel Nature Reserve Strategy (Condition D41);
- Flood Risk Management Plan (Condition D43); and
- Drinking Water Quality Assurance Program (Condition D45, as modified).

It is noted that the Flood Risk Management Plan and Bushfire Emergency Evacuation Plan have been updated to address the proposed modification, and are attached in **Appendix C** and **Appendix D**, respectively.

3.4 Modifications to Approval Instruments

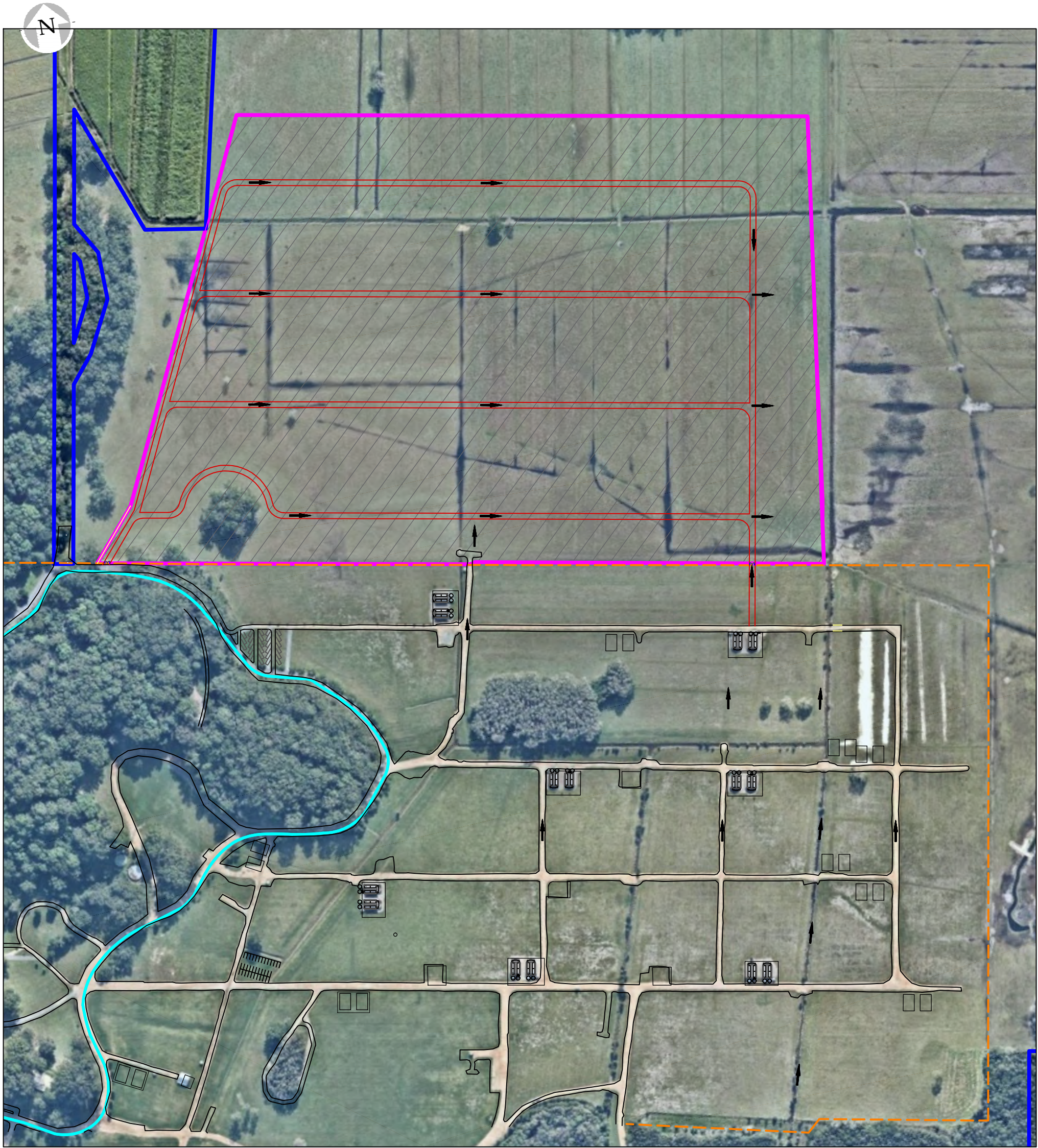
The proposed modification would only require minor amendments to the development consent and concept plan approval instruments.

Required amendments to the development consent instrument (SSD 8169) include:

- Definitions – to add reference to the modification application in the definition of ‘Modification Assessments’; and
- Appendix 1 – to update the Land Use Structure Plan and Ecological Structure Plan.

Required amendments to the concept plan instrument (MP 09_0028) include:

- Term A2 – to add reference to the modification application; and
- Term A3 – to update the Land Use Structure Plan and Ecological Structure Plan.



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- Legend:
- | | | | |
|---|-----------------------|--|---|
|  | Proposed camping area |  | Proposed access roads |
|  | Existing amenities |  | Existing access roads |
|  | Parklands Drive |  | Core event & conference centre use area |



Date	September 2020
Author Reference	Planners North 1287.3374

IMPORTANT NOTE |
Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only.

Sources | Aerial Photography: Nearmap (June 2020)
|Camping Layout: Knappick Camping Option 10-08-20.dwg

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Originally - design team ink
Updated - Planners North

Figure | 8
Camping Area Expansion
North Byron Parklands | Tweed Valley Way & Jones Road



4 PLANNING CONTEXT

4.1 State Significant Development

The approved development (SSD 8169) was classified as State Significant Development under Part 4, Division 4.7 of the EP&A Act, as it involved development for the purposes of cultural, recreation and tourist facilities² with a capital investment value of more than \$30 million, and therefore triggered the criteria in Clause 3 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011*.

The NSW Independent Planning Commission (the Commission) was the consent authority for the original development application, as Byron Shire Council and Tweed Shire Council initially objected to the proposal, and more than 25 public submissions objected to the proposal. It is understood that the Department can determine the modification application under delegated authority.

4.2 Section 4.55 of the EP&A Act

Under Section 4.55(1A) of the EP&A Act, a consent authority may modify a development consent if it:

- (a) is satisfied that the proposed modification is of minimal environmental impact;
- (b) is satisfied that the development as modified is substantially the same development as the development as originally granted;
- (c) has notified the application in accordance with the regulations or a development control plan, if required; and
- (d) has considered any submissions made concerning the proposed modification.

It is considered that the proposal represents a minor modification of the development consent as originally approved, as it:

- does not affect the approved use of the North Byron Cultural Events Site project and concept plan;
- does not involve any change to the maximum capacity of the approved project or the approved events (see comparison in **Table 3** below);
- does not involve any change to the approved number of event days or camper numbers;
- is located within the broad Parklands site as defined in the development consent and concept plan, and represents only a 31 hectare (or 18%) expansion of the existing event area;
- does not affect the development's consistency with any environmental planning instrument (see below); and
- would not result in any significant change to the environmental effects of the approved development (see Section 5).

Table 3: Comparison Between Approved and Proposed Development

Element	Existing Approval	Proposed Modification	Change
Total number of event days	20	20	No change
Total number of campers during large summer event	30,000	30,000	No change
Total number of campers during large winter event	25,000	25,000	No change
Total number of campers during medium events	25,000	25,000	No change
Total number of campers during small community event	5,000	5,000	No change
Total number of campers during minor community event	1,500	1,500	No change
Total core event area (hectares)	139	170	+31 (18%)

² As an entertainment facility and/or recreation facility (major).



For the above reasons, it is considered that the development as modified is substantially the same development as that originally granted, and can be considered and determined as a minor modification under Section 4.55(1A) of the EP&A Act.

It is noted that the regulations do not require the application to be notified, nor does any development control plan.

4.3 Section 75W of the EP&A Act

The transitional arrangements in Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* (EP&A Savings and Transitional Regulation) provide that modifications to approved concept plans can be assessed and determined under the former Section 75W of Part 3A of the EP&A Act.

Under Clause 3BA(5) of Schedule 2 of the EP&A Savings and Transitional Regulation, the Minister may modify a concept plan under Section 75W if:

- (a) the proposed modification is to correct a minor error, misdescription or miscalculation, or
- (b) the proposed modification is of minimal environmental impact, or
- (c) the project to which the modified concept plan relates is substantially the same as the project to which the approved concept plan relates.

For the reasons outlined in Section 4.2 above, it is considered that the project to which the modified concept plan relates is substantially the same as the project to which the approved concept plan relates, and that the proposed modification is of minimal environmental impact.

4.4 Environmental Planning Instruments

The proposed modification does not alter the approved development's consistency with the applicable provisions of relevant environmental planning instruments, and it is considered that the development as modified is able to be undertaken in a manner that is generally consistent with all of the applicable provisions of the instruments. Consideration of the applicable instruments is presented in the following table.

Table 4: *Consideration of Environmental Planning Instruments*

Instrument	Consideration
<i>State Environmental Planning Policy (SEPP) No.33 – Hazardous and Offensive Development</i>	<p>SEPP 33 provides definitions for hazardous and offensive industry to enable decisions on developments to be made on the basis of merit, rather than on industry type per se.</p> <p>The approved Parklands development did not constitute a 'potentially hazardous industry' or 'potentially offensive industry', and the approved development is able to be conducted in a manner that is consistent with the aims, objectives and provisions of SEPP 33.</p> <p>The proposed modification does not involve any change to approved dangerous goods or hazardous material storage or use on the site.</p>
<i>State Environmental Planning Policy (Koala Habitat Protection) 2019 (Koala SEPP)</i>	<p>The Koala SEPP aims to encourage the conservation and management of areas of natural vegetation that provide habitat for koalas to support a permanent free-living population over their present range and reverse the current trend of koala population decline.</p>



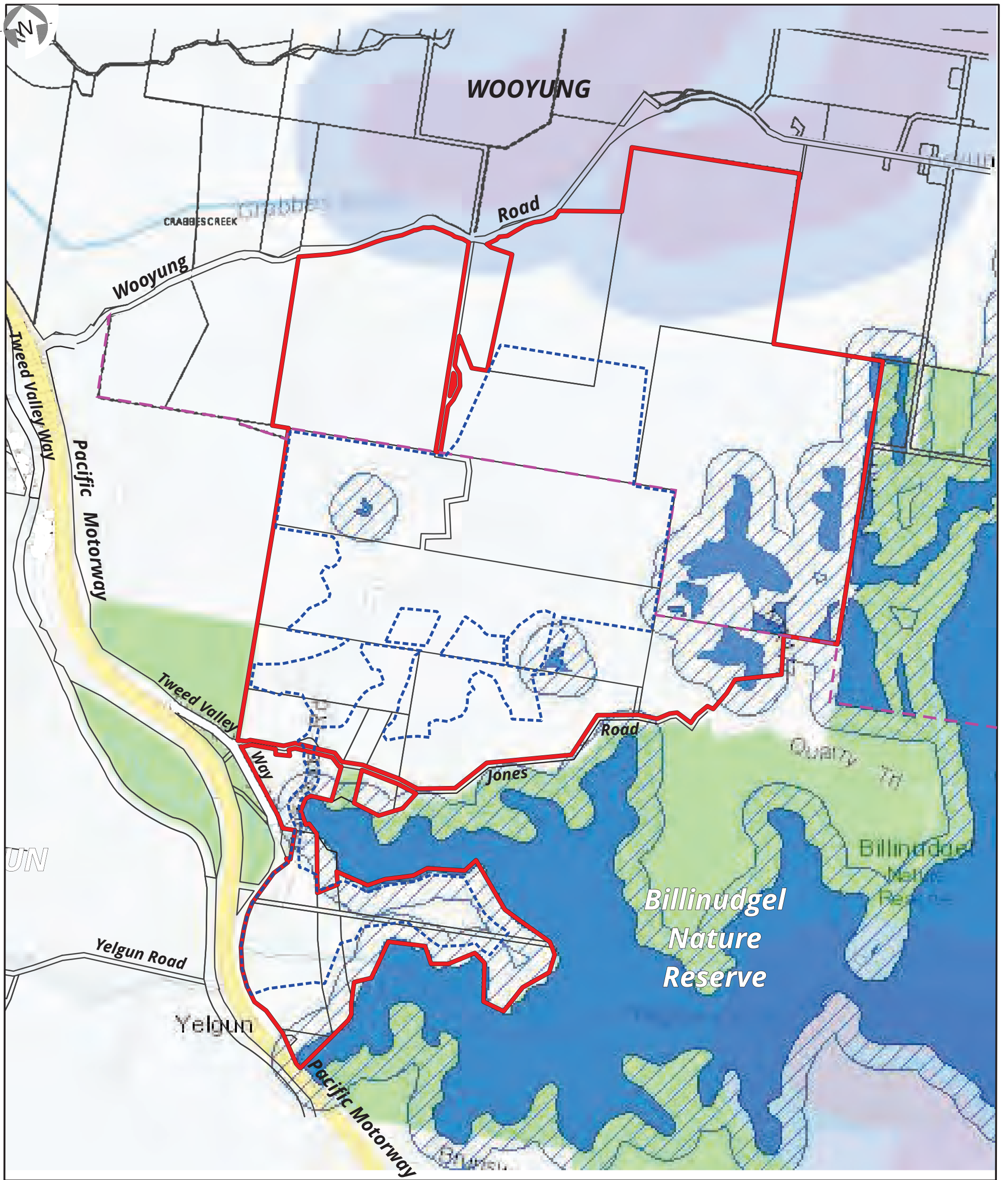
<i>Instrument</i>	<i>Consideration</i>
	<p>Clause 8 of the SEPP requires a consent authority's determination of the development application to be consistent with any approved koala plan of management (KPoM) that applies to the land.</p> <p>Parklands has prepared a KPoM for the Parklands site, in accordance with Condition D39 of the development consent.</p> <p>As outlined in the KPoM and EIS for the approved development, there is some koala habitat in the vicinity of the site, including in Billinudgel Nature Reserve to the east of the site, and in the forest blocks in the western part of the Parklands site. There is also a small area of land identified on the 'koala development application map' under the SEPP.</p> <p>This habitat would not be affected by the proposed modification, which is restricted to predominately cleared pasture areas, and does not involve any clearing. The proposed expanded camping area is wholly outside the habitat areas and habitat buffer areas in the KPoM, and the proposal does not involve any change to the approved maximum capacity of the events on site.</p>
<i>SEPP No.55 – Remediation of Land</i>	<p>SEPP 55 aims to provide for a statewide planning approach to the remediation of contaminated land, and in particular, to promote the remediation of contaminated land for the purpose of reducing risk of harm to human health or any other aspect of the environment.</p> <p>Clause 7 of the SEPP requires a consent authority to consider whether the land to which a proposal relates is contaminated, and if the land is contaminated, to be satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation), prior to granting consent.</p> <p>The potential for contamination within the Parklands was assessed as part of the approved development, which found that the site was not contaminated and is suitable for its cultural events use.</p> <p>The expanded camping area is used for broad acre agriculture (cattle grazing), in a similar manner to the land use history of other areas of the Parklands site, and is unlikely to contain any significant or widespread contamination.</p>
<i>SEPP No.64 – Advertising and Signage</i>	<p>SEPP 64 aims to ensure that any signage associated with a development, including any advertisement, that is visible from a public place is compatible with the desired amenity and visual character of an area, is suitably located and is of a high quality and finish.</p> <p>Signage associated with the approved development is consistent with the provisions of SEPP 64, and the proposed modification does not involve any material change to signage associated with the approved development.</p>
<i>SEPP (Coastal Management) 2018</i>	<p><i>SEPP (Coastal Management) 2018</i> (Coastal Management SEPP) aims to protect, preserve and manage the environmental, social and economic values of the coastal zone, and encourage a strategic approach to coastal management.</p>



<i>Instrument</i>	<i>Consideration</i>
	<p>The policy applies to land within the coastal zone, which comprises four coastal management areas, including:</p> <ul style="list-style-type: none">• coastal wetlands and littoral rainforest areas;• coastal vulnerability areas (ie. areas subject to erosion and hazard);• coastal environment areas (ie. coastal waters, lakes, lagoons and associated areas); and• coastal use areas (ie. sensitive land adjacent to coastal waters). <p>The proposed expanded camping area, as well as the relocated bushfire emergency assembly area, are not located within any of these areas, as per the mapping under the SEPP (see Figure 9). A small corner of the proposed bushfire assembly area is potentially located within the wetland 'proximity area', although no significant works are proposed in this area.</p> <p>There are mapped coastal wetlands to the east, south and south-west of the proposed expanded camping area, and mapped coastal environment areas to the north of the proposed camping area. The temporary camping on the site during events, and minor associated infrastructure, is not expected to have any direct or indirect impacts on these areas, subject to continued implementation of the existing environment management measures, including erosion and sediment control, and waste management.</p>
<i>SEPP (Infrastructure) 2007</i>	<p><i>SEPP (Infrastructure) 2007</i> aims to facilitate the effective delivery of infrastructure across the State.</p> <p>Clause 104 of the SEPP applies to traffic generating development and ensures that Roads and Maritime Services (RMS) is given the opportunity to make representations on certain traffic generating development applications before a consent authority makes a determination on the proposal.</p> <p>The approved Parklands project met the thresholds in Schedule 3 of the SEPP (as a place of assembly with parking for over 200 vehicles), and was therefore traffic generating development for the purposes of the SEPP.</p> <p>Comprehensive traffic assessment has been undertaken for the approved development, in consultation with the RMS. The proposed modification does not involve any change to maximum traffic generation associated with the approved project, or any change to approved traffic access or impacts.</p>
<i>SEPP (Miscellaneous Consent Provisions) 2007</i>	<p><i>SEPP (Miscellaneous Consent Provisions) 2007</i> aims (amongst other things) to ensure that suitable provision is made for ensuring the safety of persons using temporary structures, and to encourage the protection of the environment by managing noise, parking and traffic impacts and ensuring heritage protection.</p> <p>Clause 12 of the SEPP outlines a number of matters that a consent authority is required to consider before granting consent to the erection of temporary structures. Consideration of these matters was provided in the EIS for the approved development, and the proposed modification does not involve any change to maximum capacities of events on the site. As such, the ongoing use of temporary structures associated with the Parklands site is able to be readily managed in accordance with the aims, provisions and matters for consideration in the SEPP.</p>



Instrument	Consideration
<i>SEPP (Primary Production and Rural Development) 2019</i>	<p><i>SEPP (Primary Production and Rural Development) 2019</i> aims to facilitate the orderly and economic use and development of lands for primary production, and to implement measures designed to reduce land use conflicts.</p> <p>The approved development does not involve any significant change to pre-existing development on the site, and does not adversely affect the use of the site for continued agricultural purposes outside the outdoor event periods, which amount to a maximum of 20 event days per year. The proposed modification would not significantly affect the agricultural capability of the subject land.</p>
<i>Local Environmental Plans</i>	<p>The North Byron Parklands site is located predominantly within the Byron local government area (LGA), although the site also includes some land within the Tweed LGA, which currently accommodates the northern access road and the bushfire emergency assembly area. The LGA boundary is located along the northern boundary of the current event area, and therefore the proposed expanded camping area is located in the Tweed LGA.</p> <p>The Parklands site encompass a number of land use zones under the <i>Byron Local Environmental Plan (LEP) 2014</i>, the <i>Byron LEP 1988</i>, and the <i>Tweed LEP 2014</i>, including:</p> <ul style="list-style-type: none">• <i>Byron LEP 2014</i>:<ul style="list-style-type: none">○ RU1 Primary Production;○ RU2 Rural Landscape;• <i>Byron LEP 1988</i>:<ul style="list-style-type: none">○ 1(a) (General Rural Zone);○ 1(b1) (Agricultural Protection (b1) Zone);○ 7(k) (Habitat Zone);○ 9(a) (Proposed Road Reserve Zone);• <i>Tweed LEP 2014</i>:<ul style="list-style-type: none">○ RU1 Primary Production; and○ RU2 Rural Landscape; <p>The proposed camping area expansion (and relocated bushfire emergency assembly area) is predominately zoned RU1 under the Tweed LEP, although a small portion on the western side is zoned RU2 under the LEP (see Figure 10).</p> <p>As outlined above, the Parklands cultural events site (including the expanded camping area and assembly area) is subject to an existing concept plan approval and State Significant development consent. Essentially, this means that the proposed development is permissible in the RU1 and RU2 zones, despite anything to the contrary in the LEPs.</p> <p>Notwithstanding, the proposed modification is considered to be consistent with the objectives of both the RU1 and RU2 zones, which generally seek to encourage sustainable agricultural production, maintain the rural landscape character of the land, and support other compatible land uses.</p> <p>The occasional use of the expanded camping area during cultural events is considered to be consistent with these zone objectives, as it would not adversely affect the agricultural capability of the land, and would not affect the rural landscape character. As such, the proposal is considered to represent a compatible land use to the ongoing agricultural land uses on the site and in the surrounding area.</p>



0 500m
1 : 15 000 @ A3

Legend



Parklands site



Property boundary



Core event & conference centre use areas



Coastal Wetlands



Proximity Area for Coastal Wetlands



Coastal Environment Areas Map



Coastal Use Area Map



Date September 2020
Author Reference Planners North 1287.3374

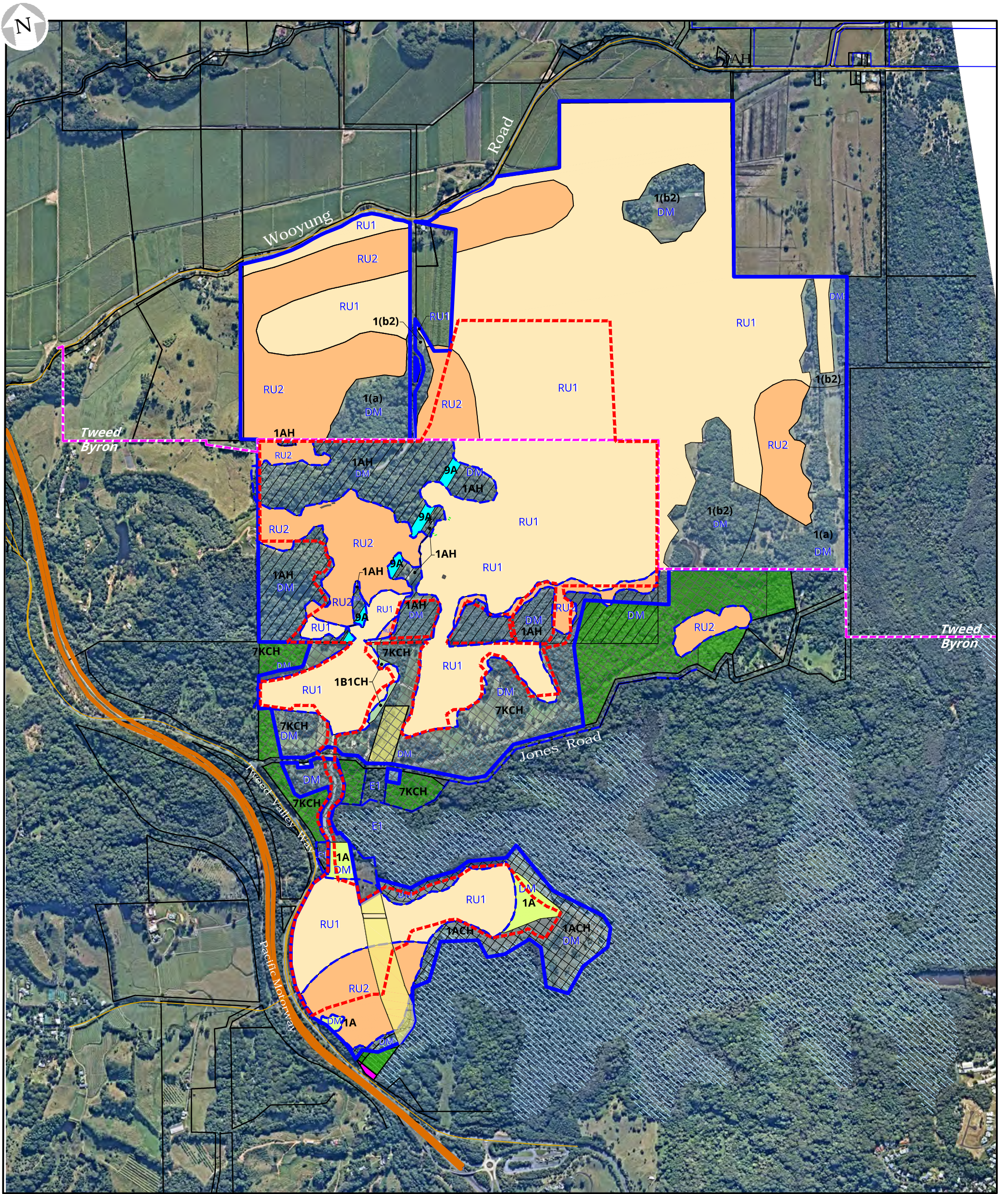
IMPORTANT NOTE | Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only.

Sources | Wetlands: Department of Planning and Environment - Coastal Management SEPP

Prepared by
Originally - design team ink
Updated - Planners North

Figure | 9
Coastal Management Areas

North Byron Parklands | Tweed Valley Way & Jones Road



0 400m
1:15 000 (@ A3)

Legend:

- Parklands site
- Land dedicated to NPWS
- Road reserve widening
- Core events & conference centre use areas
- Shire boundary
- BLEP 2014 Boundaries
- TLEP 2014 Zone boundaries
- BLEP 1988 Zone boundaries
- SEPP 14 Wetlands

Byron & Tweed 2014 LEP Zones:

- DM Deferred Matter
- E1 National Parks & Nature Reserves
- RU1 Primary Production
- RU2 Rural Landscape

Byron 1988 & Tweed 2000 LEP Zones:

- 1A 1(a) - General Rural
- 1A(1) 1(a) Cross Hatched - General Rural
- 1A(2) 1(a) Hatched - General Rural
- 1A(3) 1(b1) Cross Hatched - Agricultural Protection
- 7A 7(a) - Wetlands
- 7KCH 7(k) Cross Hatched - Habitat
- 9A (9a) Proposed Road Reserve



Date	September 2020
Author	Planners North
Reference	1287.3374

IMPORTANT NOTE | Cadastral information is subject to survey. The alignment of the aerial photograph and vectorial overlays is approximate only.

Sources | Aerial Photography: Nearmap (June 2020)
| Cadastre: Ardill Payne (2009) Updated 2020
| Zoning: Byron LEP 1988 & 2014 | SEPP 14: Balanced Systems

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Originally - design team ink
azaCAD
Updated - Planners North

Figure | 10
Zoning Plan

North Byron Parklands | Tweed Valley Way & Jones Road



5 ENVIRONMENTAL ISSUES

Consideration of the environmental effects of the proposed modification is presented below. In summary, it is considered that the proposal would result in minimal change to the environmental effects of the development as approved.

5.1 Soil and Water

5.1.1 Background

The Parklands site is located in two main drainage catchments, divided by the east-west alignment of Marshalls Ridge and Jones Road through the centre of the site.

The majority of the northern camping/event area, including the proposed expansion area, is within the Crabbes Creek floodplain, which forms part of the Mooball Creek catchment. Runoff from the northern part of the site drains generally to the north-east through a series of agricultural drains, discharging to the Crabbes Creek drainage system approximately 3 kilometres to the north-east of the site. Crabbes Creek flows northward along the coast, draining into Mooball Creek which also flows northward along the coast, eventually discharging to the Pacific Ocean at Pottsville.

5.1.2 Erosion and Sedimentation

Soil and water assessments previously undertaken for the Parklands project indicate that the lower lying portions of the site are underlain by Quaternary alluvial deposits of sand, silts and clays overlying Pleistocene sand deposits. Marshalls Ridge and the more elevated areas in the west of the site are underlain greywacke, slate, phyllite and quartzite.

The assessments indicate that the overall soil erosion hazard on the site is low considering the soil types and control measures. Nonetheless, the proposal has some potential for erosion and sedimentation risks, particularly associated with:

- internal road construction and maintenance; and
- event and camping area usage during events.

Erosion and sedimentation risks are able to be effectively managed using standard best practice control measures, including:

- maintaining grass cover across event, camping and parking areas;
- minimising disturbance areas as far as practicable, and limiting traffic on disturbed areas;
- ensuring stockpiles are located away from drainage lines;
- controlling 'dirty' run-off from within construction disturbance areas via various controls such as sediment fencing and traps/basins;
- directing run-off through grassed or vegetated swales prior to discharge from site; and
- rehabilitating disturbed areas as quickly as possible following disturbance.

These measures would be incorporated into Parklands' detailed Erosion and Sediment Control Plan (ESCP), which forms part of the Construction Environment Management Plan (CEMP) required under Condition C5 of the development consent. Parklands would update the ESCP and CEMP to accommodate and reflect the proposed modification. The updated ESCP would be prepared in accordance with the above principles and the OEH's *Managing Urban Stormwater – Soils and Construction* guidelines (ie. the 'blue book').

5.1.3 Contamination

A site contamination assessment was undertaken by EAL Consulting Services (Southern Cross University) on behalf of Parklands for the original concept plan and project application. The assessment included:



- site history review;
- geological and hydrogeological review;
- site inspection;
- soil and water sampling, including 65 individual soil samples and 1 water sample from the farm dam; and
- analysis for potential contaminants of concern.

The assessment found that prior to the Parklands project, the site had been used for low intensity agricultural purposes since at least 1947. Past agricultural uses included dairy farming, some cropping for bananas (approximately 10 to 12 acres for 3 to 4 years, typically on north-facing slopes), some cropping for sugarcane (in low-lying areas) and, predominantly, cattle grazing.

These agricultural activities (other than banana cropping) have also taken place on the proposed campground expansion area over the past 60 years.

The potential for significant or widespread contamination associated with the use of the site for cultural events and camping is considered low given the periodic nature of the events and the mitigation measures employed by Parklands, which include:

- diesel fuel used in generators during events is stored within the generator units and refuelled from a mobile double-skinned storage tank, and removed from site after each event;
- all permanent fuel and chemicals stored and used on site (the quantities of which are minor), are stored in appropriately bunded (and covered) areas in accordance with *AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids*;
- wastewater management is undertaken in accordance with an established on-site sewage management system, and monitoring has not identified any contamination to date; and
- Parklands' stormwater monitoring program, which has not identified any contamination to date.

Consequently, it is considered that the ongoing use of the site for cultural events, including the expanded camping area, is unlikely to result in any significant or widespread contamination, subject to the continued implementation of best practice control measures.

5.1.4 Acid Sulfate Soils

An acid sulfate soils (ASS) assessment was undertaken by EAL Consulting Services on behalf of Parklands for the original concept plan and project application. The assessment included:

- geological and hydrogeological review;
- site inspection;
- review of ASS risk mapping; and
- soil sampling and analysis, including 69 individual soil samples from 17 boreholes.

The assessment found that potential and actual ASS are present in the low-lying areas of the site below approximately 3 to 4 mAHD. On this basis, as with much of the existing event area, it is likely that ASS are present in the low-lying areas of the proposed expanded campgrounds. Disturbance of these subsoils during excavation works has the potential to affect downstream sensitive environments (through acidic discharges and mobilisation of dissolved metals), and damage structures and services (through acidic corrosion), if not appropriately managed.

In accordance with the recommendations of the ASS assessment and the EPA's *Acid Sulfate Soil Manual*, a site-specific Acid Sulfate Soils Management Plan (ASSMP) was subsequently prepared for the Parklands site by Ardill Payne & Partners (June 2010). The ASSMP forms part of the CEMP, as required under Condition C5 of the development consent.

The ASSMP sets out a range of best practice measures for managing actual and potential ASS on the site, including:



- treatment of ASS encountered in construction works using lime in appropriately banded areas;
- soil sampling and analysis to verify neutralisation of ASS;
- treatment of excavated trenches and other excavations using lime;
- minimising disturbance areas and excavation as far as practicable;
- diverting 'clean' run-on water around disturbance areas; and
- monitoring of downstream drainage lines and waterbodies.

The proposed modification involves the ongoing use and development of the site in a similar manner to the approved development, and does not involve any significant excavation into the subsoils. Notwithstanding, all works will be undertaken in accordance with the ASSMP and CEMP, which would be updated to reflect the proposed modification.

5.1.5 Groundwater

The soil and water assessments undertaken for the original Parklands project indicate that the groundwater level is typically within about 1.5 metres of the natural ground surface in the low-lying areas of the site, and increasing in the more elevated areas of the site.

The proposed modification is not expected to have any discernible impact on groundwater quantity (ie. flows) or quality, as the proposal does not involve groundwater extraction, or any significant excavation or development.

5.1.6 Riparian Areas, Waterbodies and Wetlands

As outlined above, the event and camping areas to the north of Jones Road (including the proposed expanded campgrounds) are located within the Crabbes Creek floodplain, which discharges to the Mooball Creek catchment. The northern part of the site is dissected by a number of agricultural drains and drainage lines, which discharge to agricultural drains on neighbouring properties to the north.

As outlined in Section 4.4, there are wetlands listed under the Coastal Management SEPP located within and adjacent to the Parklands site, in particular in Billinudgel Nature Reserve to the east of the site (see **Figure 9**). The proposed camping expansion area is located outside the mapped wetland areas and wetland proximity areas, with the campgrounds located approximately 350 metres from the nearest wetland, and 250 metres from the wetland proximity area. A small corner of the bushfire assembly area is potentially located within the mapped wetland proximity area, however no significant works are required or proposed in the assembly area.

The proposal is not expected to result in any direct or indirect impacts on the wetlands, and no significant impacts on the drainage lines within the site, subject to the continued implementation of standard best practice stormwater management controls.

In this regard, as outlined on the civil design plans in **Appendix B**, a number of culverts would be installed within the agricultural drainage lines where they are crossed by the proposed event roads, with on-site stormwater runoff directed to these drainage lines. All stormwater drainage works would be implemented in accordance with the ESCP and CEMP which, as outlined above, would be updated to accommodate the proposal.

5.1.7 Flooding

The low-lying areas of the Parklands site, including the existing northern event area and proposed campground expansion area, are subject to flooding.



Flooding in the region is generally seasonal, occurring in the early months of the year associated with two distinct weather patterns: ex-tropical cyclones and east coast low pressure systems.

In the early months of the year tropical cyclones originating in the Coral Sea may move south, and there have been occasions when the path of a cyclone has generated rains of duration and intensity to produce a flood in the Northern Rivers catchments.

The most potent cause of flood rain events is the development of east coast low systems close to the coast, which usually form off either southern Queensland or northern NSW in a trough from the Coral Sea or from a shallow system. Depressions can develop at any time of year, but are most likely when sea surface temperatures are high and the air is humid. Therefore, most flood events on the Far North Coast and the Brunswick Valley catchment occur in the first half of the year, with a peak period from February to April.

Rainfall patterns are also dependant on weather patterns that occur throughout the year. Flooding is more prevalent in a La Nina year when rainfall is significantly greater than the mean average rainfall. Thunderstorms, which generally occur during the summer, can also result in localised flooding which can impact on the Parklands site.

Flood Probabilities

To address flood risk on the site, Parklands has developed a comprehensive Flood Risk Management Plan (FRMP), the implementation of which is required under Condition D43 of the development consent.

The FRMP includes analysis of the probability of a flood occurring during an event day, concluding that such a probability is extremely low. **Table 5** below shows the probabilities for various flood events occurring during any of the proposed outdoor events.

These probabilities ignore any seasonality in flooding. Given that the main Splendour and Falls Festival events are outside the peak flood season, the probabilities shown are conservative and the probability of events being flooded is most likely to be less than those indicated in the table.

Table 5: *Flood Probabilities*

<i>Flood Magnitude</i>	<i>Chance of Flood Occurring During an Event</i>
1 in 5 year	1 in 91
1 in 20 year	1 in 365
1 in 50 year	1 in 913
1 in 100 year	1 in 1,825
Probable Maximum Flood	1 in 182,500

Flooding on the Site

The Parklands site is affected by both localised catchment flow and flooding from the broader catchment. Local flooding occurs more quickly but is shallower and of shorter duration, while flooding from the broader catchment takes longer to arrive but may be deeper and remain on site for longer.

Inundation in the northern portion of the site (including the proposed expanded campground) comes initially from overflow of local drains and watercourses in the relatively small catchments draining to the site. Following this, and independent of such flooding, flooding from the Crabbes/Mooball Creek catchment backs up into the low-lying areas in the north-eastern areas, covering a large portion of the existing and proposed event and camping area.



The backwater flooding takes longer to arrive at the site, as the flood storage downstream of the site effectively has to 'fill up' prior to the site being inundated by major catchment flooding. However, back-up flooding has the potential to result in greater flood depths, and as such, flood risk in the northern portion of the site is dominated by back-up flooding from Crabbes Creek. These floodwaters have low velocities, typically 0.1m/sec.

While the low-lying portions of the site are flood affected, considerable areas in the north-western part of the site remain flood free, even in the largest flood events (see **Figure 11**).

Flood Depths and Hazards

Flood depths and hazard ratings³ across the Parklands site (and proposed expanded campgrounds) for extreme storm events is shown on **Figures 11** and **12**.

For a 1 in 100 year event, floodwaters would reach a depth of approximately 1.5 to 2 metres in the northern event and camping areas. Whilst the floodwaters do not have a high velocity (due to the back-up nature of the flooding), relatively large parts of the site would have a high flood hazard rating due to the depth of the floodwaters. Even in the largest floods considerable land on the site, especially in the north-western part of the event area, remain flood free.

As outlined on the figures, the flood depths and hazards within the proposed campground expansion area, and the distance to flood-free land, is similar to the existing approved event area.

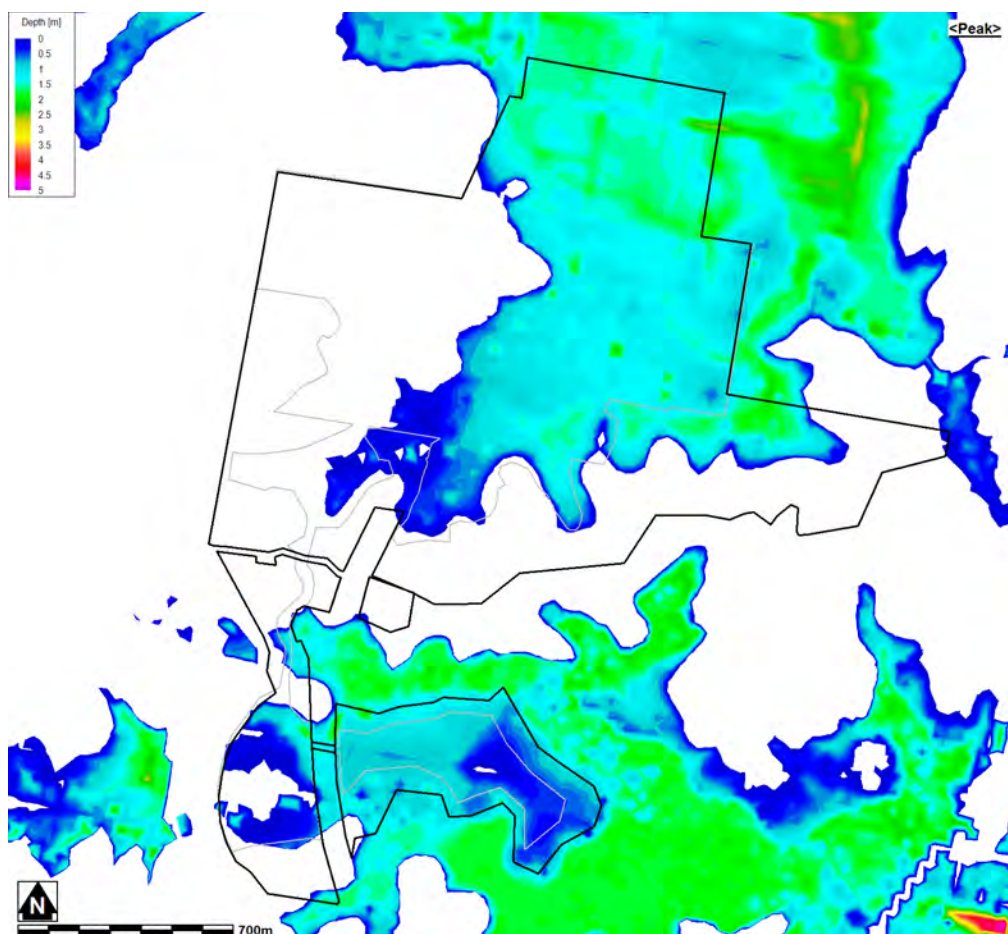


Figure 11: Peak Flood Depths 100yr Flood Event (Source: Molino Stewart)

³ Based on the approved FRMP.

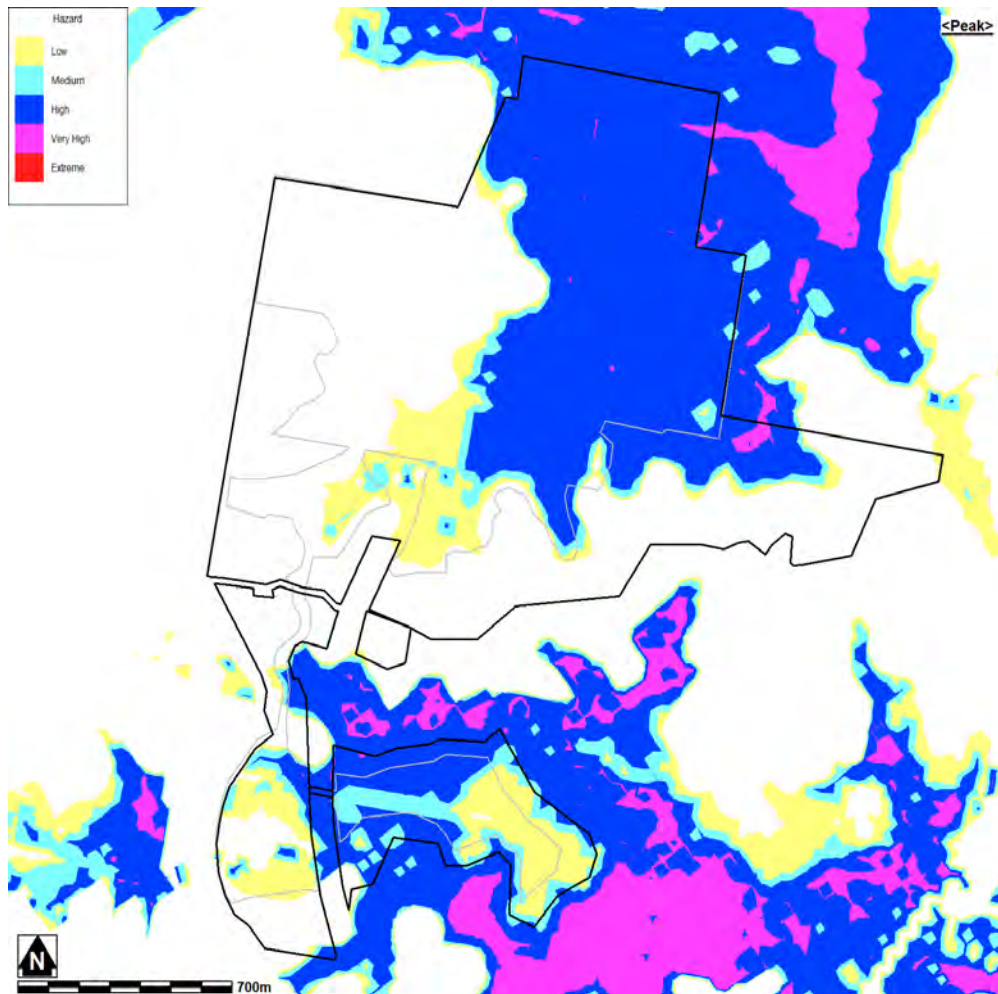


Figure 12: Peak Flood Hazard 100yr Flood Event (Source: Molino Stewart)

Evacuation Times and Risks

The rate at which floodwaters rise also contributes to the overall flood hazard. In the northern event area, flood modelling indicates that it would take about 2 hours before there is any noticeable water over the ground in a 5 year flood event, or approximately 1.5 hours in the Probable Maximum Flood (PMF) event. To reach hazardous levels (say 0.7 metre depth), it would take more than 12 hours in the 5 year flood event and 4 hours in the PMF event.

The FRMP includes modelling of the time required to evacuate during events of varying sizes, for both vehicular traffic and pedestrians (including both patrons and additional people on site).

For a 35,000 patron event, the assessment found that it would take about 8.5 hours to evacuate all vehicles from site, or 6 hours if the Tweed Coast Road evacuation route to the north-east is also able to be used⁴. For a 50,000 patron event, it would take about 10 hours to evacuate all vehicles from site, or 6.5 hours if the Tweed Coast Road evacuation is also able to be used. Delays and incidents have the potential to extend these times by up to about 4 hours.

⁴ The key evacuation route would be via Tweed Valley Way. The Wooyung Road / Tweed Coast Road route may also be able to be used, however parts of the route are subject to flood inundation in major floods.



Comparing these times to the flood rise times in the preceding section, it is clear that vehicular evacuation would have to occur well before a flood-causing rainfall event, if it is expected to get all vehicles and patrons off-site ahead of floodwaters becoming hazardous.

To this end, the FRMP also provides for pedestrian evacuation to an on-site flood emergency assembly area on flood-free land in the north-western area of the site. The assembly area is the main amphitheatre (surrounding the main stage), and neighbouring flood-free high-grounds north and west of the amphitheatre.

The amphitheatre has toilet facilities, water supply, and can host all people on site in a 50,000 patron event. The amphitheatre is one of the most recognisable parts of the Parklands site for patrons (as it is the location of the main stage), and can be reached using the spine road and the emergency access road (plus a number of existing mapped farm tracks), which are built above the 1 in 100 year flood level.

The existing FRMP states that the furthest anyone would have to walk from a flooded event area to the flood emergency assembly area is about 800 to 900 metres, which would take no more than 25 minutes even at a slow walking pace (which could occur with large events).

The maximum distance to elevated land above the PMF in relation to the proposed expanded campgrounds is approximately 750 metres. As such, the flood assessments indicate that flood risks associated with the expanded campgrounds would be similar to the existing event area, and that there is ample time for pedestrians to safely evacuate on foot to flood-free ground from the expanded campgrounds, even in the largest flood events.

Parklands' FRMP has been developed and updated in consideration of these evacuation times, as well as a range of other risk factors including:

- time of the event (eg. during bump-in, event, bump-out);
- intoxication of patrons;
- night-time flooding;
- on-site resources for those on site during floods (eg. food, water, amenities);
- asset damage;
- electrocution risk;
- medical emergencies; and
- external road flooding.

Flood Risk Mitigation

To manage flood risks, a number of measures have been implemented under the development consent, including:

- the spine road and key event laneways have been constructed above the 100 year flood level;
- a 0.75 hectare area within the event area has been developed above the 100 year flood level for campers with children and less mobile patrons;
- the flood emergency assembly area has been established on the flood-free land in the north-western area of the site;
- key infrastructure (including electrical boards) and permanent structures have been (or would be) developed above the 100 year flood level;
- a detailed rainfall event forecasting system, rainfall recording station, and stream height gauging stations have been developed (see discussion below); and
- a detailed FRMP and Emergency Event Evacuation Plan have been developed.

All flood-related incidents and emergencies on site are coordinated through Parklands' Incident Command and Control System (ICCS) via the Event Communications Centre (ECC).



Parklands' FRMP includes provision for a detailed rainfall forecasting and flood warning system (known as the Significant Rainfall Forecasting System, or SRFS), with thresholds for evacuation response and appropriate management actions. The system ensures that evacuation response actions are enacted well before floodwaters reach dangerous levels. The system is described in detail in the EIS for the approved development.

The FRMP has been updated to reflect the proposal and is attached as **Appendix C**.

5.2 Noise and Vibration

A noise assessment for the proposed campground expansion has been undertaken by Air Noise Environment (ANE), and is attached as **Appendix E**.

The assessment includes modelling of two scenarios (see **Figure 13**), namely:

1. The existing northern campground; and
2. The existing northern campground and proposed campground expansion.



Figure 13: Noise Modelling Scenarios (Source: ANE)

The modelling includes consideration of the key noise sources within the campgrounds, including:

- campers/patrons;
- camping vehicles;
- Parklands/event vehicles; and
- fixed plant, including diesel generators and light towers.

For each of the scenarios, the noise assessment determined worst case noise levels at surrounding sensitive receivers, and compared these to relevant noise criteria, including:

- the lowest noise criteria in the development consent, for noise during event hours – ie. 45dB $L_{Aeq}(10 \text{ minute})$;
- the lowest noise criteria in the *NSW Noise Policy for Industry (NPfI)*, for noise outside event hours – ie. 35dB L_{Aeq} ; and
- applicable sleep disturbance criteria, for sudden noise outside event hours – ie. 45 dB L_{Amax} .



With regard to noise during event hours (ie. 11am to 2am), the assessment found that the noise emissions associated with the campground would increase by up to 4.5 dB at surrounding receivers that do not have noise agreements with Parklands, but that worst case noise levels at these receivers (ie. 36.5 dB) would remain well below the lowest applicable noise criterion of 45 dB $L_{Aeq}(10 \text{ minute})$.

Noise levels during event hours at receivers that do have noise agreements with Parklands would increase by up to 5.3 dB, but worst case noise levels at these receivers (ie. 42 dB) would also remain comfortably below the applicable criterion.

With regard to noise outside event hours (ie. 2am to 11am), the assessment found that the worst case noise levels would be less than 30 dB at all surrounding receivers that do not have noise agreements with Parklands, which is well below the nominal impact assessment criterion of 35dB. Noise levels at two other receivers would be marginally above the criterion at 35.8 dB (Receiver 11) and 35.4 dB (Receiver 25), however Parklands has noise agreements with both of these receivers.

With regard to sleep disturbance, the assessment indicates that noise levels at all surrounding receivers would remain well below the applicable criterion of 45 dB L_{Amax} .

The noise assessment notes that it adopted highly conservative modelling assumptions, and in reality lower receiver noise levels are likely to occur for the majority of the time. It is further noted that the events aim to provide restful sleep to the campground areas during the night period, and as such management should result in noise levels significantly lower than those predicted.

To manage noise associated with the proposed expanded campgrounds, Parklands would implement a range of measures that are consistent with the development consent and the existing measures that have been implemented for the project to date. In this regard, Parklands would:

- manage the noise emissions from the project to comply with the existing noise limits at all times, for all receivers apart from those with negotiated noise agreements;
- update and subsequently implement the Noise Management Plan, as required under Condition D34 of the consent, to minimise and manage noise impacts associated with the project. The plan includes a range of noise mitigation and management measures, including:
 - at-source acoustic attenuation measures;
 - speaker array controls;
 - adaptive noise management via the Noise Control Coordination Centre (NCCC);
 - noise complaint monitoring and response via the Community Hotline;
 - noise impact reporting; and
 - an Acoustic Monitoring Program, that includes amongst other things:
 - continuous unattended monitoring before, during and after all medium and large events;
 - attended monitoring at sensitive receiver locations for all medium and large events, and/or in response to calls to the Community Hotline;
 - implementation of the NCCC for all medium and large events, which includes:
 - real-time monitoring of noise levels for all stages;
 - monitoring of local meteorological conditions; and
 - liaison between the NCCC, Community Hotline personnel, stage managers and production personnel.

5.3 Visual and Lighting

The majority of the Parklands site, and in particular the event and camping area, is situated in a natural visual basin which assists in screening the majority of views from off-site sensitive receiver locations.



Notwithstanding, there are views to the site from some sensitive receiver locations, and lighting associated with events can also be seen from surrounding sensitive receiver locations.

A visual assessment was undertaken for the approved development by Design Team Ink, which considered the potential visual and lighting impacts associated with the event infrastructure.

The assessment was undertaken with reference to key viewing locations (KVL) and visual receptors surrounding the Parklands site, including (see **Figure 14**):

- *Public Places / Roads:*
 - M1 Pacific Motorway (KVL1);
 - Tweed Valley Way (KVL2);
 - Jones Road (KVL3);
 - Wooyung Road (KVL4); and
 - Yelgun Road (KVL5)
- *Private Places / Properties:*
 - dwellings on Yelgun Road (KVL5);
 - dwellings on Jones Road (KVL3);
 - dwellings on Wooyung Road (KVL4); and
 - dwellings on the distant escarpment.

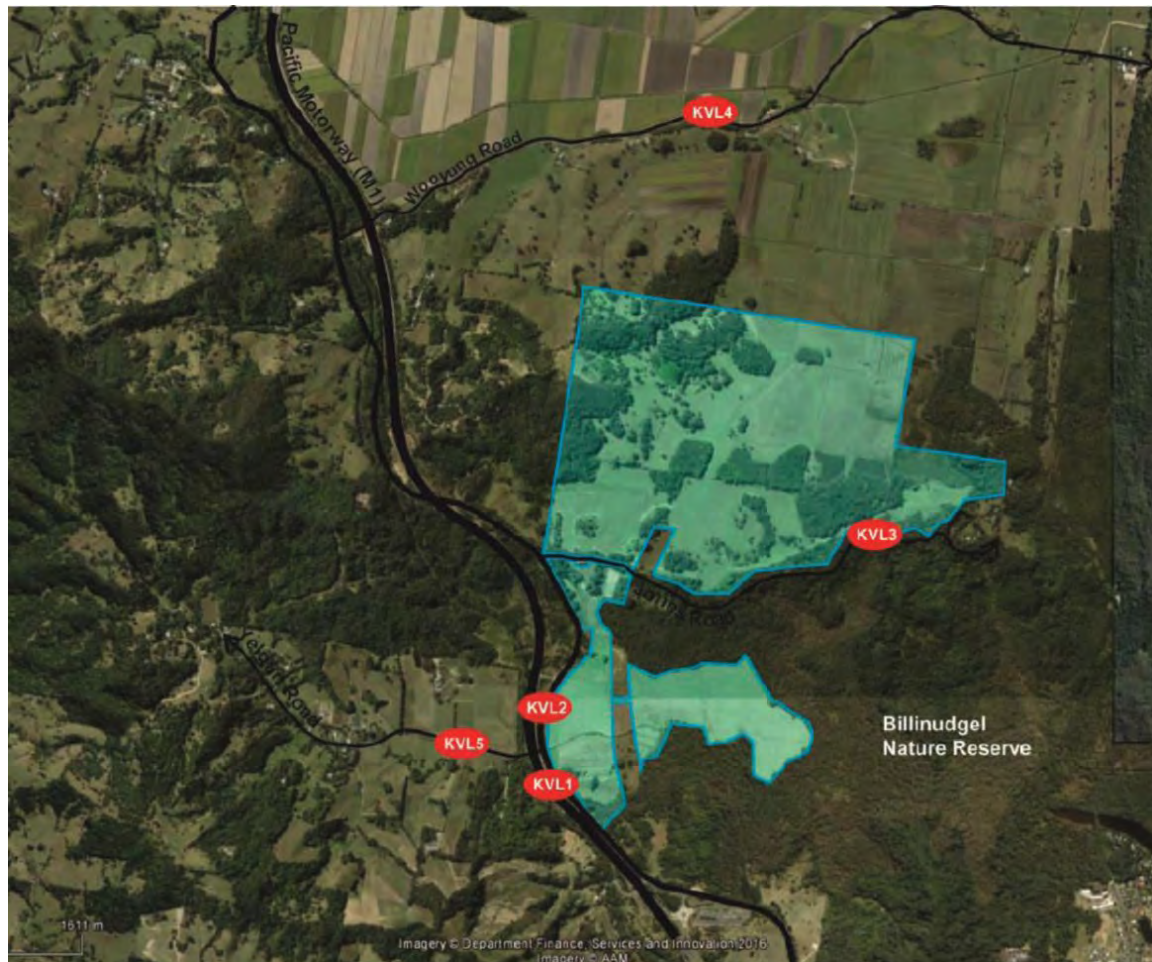


Figure 14: Key Viewing Locations (Source: Design Ink)

Additional potential viewing locations were also investigated in the locality (eg. lookouts or public parks), however no additional potential viewing locations were identified. In particular, the visual assessment noted that:



- the site cannot be seen from the Yelgun Rest Area;
- the site cannot be seen from adjoining village centres;
- the event areas are not located on a ridge top;
- the site is not located within 1 kilometre of the coastline, and cannot be seen from the beach;
- the site is unlikely to be visible from other residential areas due to site topography, structures and/or vegetation interfering with the line of sight; and
- no public lookouts within 1 kilometre of the site were identified.

Private Viewing Locations

There are 4 privately-owned dwelling locations on Wooyung Road (KVL4) from where the Parklands site (including the campgrounds expansion) may be seen, including one on the hills to the north of the site, and 3 further to the east on flatter land. There is also a landscape supplies business in this area that has views to the site.

Parts of the event area as well as the proposed camping area are able to be seen from all 4 residence locations (two nearer dwellings have agreements in place with Parklands) at viewing distances of between 600 metres and 1.5 kilometres. In all cases the temporary event infrastructure is viewed below the tree line with a hillside backdrop, and occupies a relatively small portion of the viewshed. Night lighting and night glow is evident from all 4 locations during medium and large events, and this would continue for the proposed modification.

There are 4 privately-owned dwellings on Jones Road from where the Parklands site may be seen, including one at the western end of the road, and three at the far eastern end of the road. Three of the four residences have agreements in place with Parklands.

The eastern residences are approximately 1 kilometre from the main event area at the closest point. The western residence is approximately 600 metres from the main event areas, and approximately 200 metres from the northern car parking area. Views to the site and event areas from these residences are largely screened by mature intervening vegetation and/or distance.

The proposed camping area expansion is located on the far side of the event area when viewed from these residences, and is unlikely to be significantly visible.

To manage visual and lighting related risks associated with the ongoing operation of the Parklands project, Parklands proposes to implement measures that are generally consistent with the existing measures that have been implemented for the project to date. In this regard, Parklands would:

- manage external lighting in accordance with *AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting* (or its latest version);
- manage external lighting to minimise direct lighting of surrounding bushland areas as far as practicable and within public safety constraints; and
- continue implementation of the habitat restoration and revegetation works under the Ecological Structure Plan, with revegetation to focus (in part) on screening views from sensitive receiver locations to the event areas.

5.4 Air Quality and Greenhouse Gases

The proposed modification would not result in any significant increase in air quality or greenhouse gas emissions associated with the approved development. Where possible, Parklands would encourage events to use solar powered lighting towers in the campgrounds. Dust emissions on the event roadways would be managed in a similar manner to existing roadways, with watering by water cart in dusty conditions during events.



5.5 Ecology

An ecological assessment for the proposed modification has been undertaken by Eco Logical, and is attached in **Appendix F**.

The desktop assessment includes consideration of relevant legislation (including the *Biodiversity Conservation Act 2016*, or BC Act), environmental planning instruments (including the Koala SEPP and Coastal Management SEPP), as well as consideration of existing biodiversity assessments, reporting, mapping and documented environmental values on the site.

The assessment notes that no native vegetation clearing is required or proposed, with the proposed camping expansion area (and relocated bushfire emergency assembly area) limited to predominately cleared exotic pasture areas used for cattle grazing. There is a small stand of eucalypt trees (0.33 hectares) in the south-western corner of the proposed camping area, however this would not be impacted by the proposal.

There are no known threatened species or ecological communities listed under the BC Act recorded within the camping expansion area (or bushfire assembly area), and the ecological assessment considers it unlikely that any threatened species would be found in the area given the cleared and actively grazed nature of the site.

The assessment notes that there is potential koala habitat (as mapped in the Koala SEPP) within the Parklands site, including a small amount of land within the camping area expansion area (ie. the small eucalypt stand) identified on the 'koala development application map' under the SEPP. The assessment considers that the proposal would not have any significant direct or indirect impacts on this habitat or koalas, subject to the continued implementation of the approved Koala Plan of Management (KPoM) for the Parklands site, as required under Condition D39 of the development consent.

The assessment also notes that the proposed camping area expansion site (and bushfire assembly area) are outside mapped wetland areas listed under the Coastal Management SEPP. Whilst a small corner of the bushfire assembly area is located within a mapped 'wetland proximity area', no works are proposed in this area and no impacts are expected to wetlands and aquatic/fish habitat.

The assessment considers that indirect impacts to biodiversity due to noise, light and human disturbance would be minor given the only occasional use of the camping area. Overall, a net benefit to existing native vegetation communities and habitat value is expected across the Parklands site due to the continued implementation of the approved Ecological Structure Plan and Flora and Fauna Monitoring and Adaptive Management Plan, as required under Condition D40 of the development consent.

To manage biodiversity-related risks associated with the ongoing operation of the Parklands project including the expanded camping area, Parklands would implement a range of measures that are consistent with the existing consent and the measures that have been implemented for the project to date. In this regard, Parklands would:

- update and implement the Flora and Fauna Monitoring and Adaptive Management Plan, to manage direct and indirect impacts on biodiversity;
- update and implement the Koala Plan of Management, to manage indirect impacts on koalas; and
- install human exclusion fencing closely bordering (within 10 metres of) designated forest blocks and other native vegetation across the proposed expanded campgrounds.



5.6 Heritage

A desktop Aboriginal cultural heritage assessment for the proposed modification has been undertaken by Everick Heritage, and is attached in **Appendix G**. The assessment included:

- review of previous Aboriginal heritage assessments on the Parklands site;
- search of relevant heritage registers including the Aboriginal Heritage Information Management System (AHIMS) and Tweed Shire Council Aboriginal Heritage mapping;
- analysis of the types of disturbance that may affect the nature and distribution of Aboriginal objects within the campground expansion area; and
- review of relevant legislation and guidelines.

The assessment found that no Aboriginal objects are known to occur within the area of the proposed campground, and there are no environmental features which increase the potential of the campground to contain Aboriginal archaeological sites.

The assessment notes that the entire campground expansion area has been subject to significant disturbance as a result of previous and current land uses, including reclamation, cropping and cattle grazing.

Consequently, the assessment concludes that the proposed campground expansion would not harm Aboriginal heritage values of the area, and that additional Aboriginal stakeholder consultation is not required or warranted for the proposal.

Nonetheless, the assessment recommends that the following precautionary measures are implemented to address any unexpected Aboriginal objects encountered during the project:

- preparation and implementation of an Unexpected Finds Procedure to address any Aboriginal objects identified during the works; and
- that relevant procedures are followed in the unlikely event that Aboriginal human remains are encountered during the works.

It is noted that Condition C28 of the development consent already includes requirements to address unexpected finds, with these measures addressed as part of the CEMP for the project, as required under Condition C5 of the consent. Parklands would update the CEMP to accommodate and reflect the proposed campground expansion.

5.7 Traffic and Transport

A traffic assessment has been undertaken for the proposed modification by WSP, and is attached in **Appendix H**.

The assessment notes that the proposed expansion of the event area for camping would not result in any change to the arrival or departure of day patrons, buses or service vehicles. As such, no changes to external traffic volumes or impacts associated with events on the site are expected.

The proposal would result in a small modification of the internal circulation of camper vehicles within the Parklands site. However, there would be no change to camper patron entry and exit movements (ie. they would still enter through Gate C if arriving from the south and Gate E if arriving from the north).

The reorganisation of the internal site layout would mean that some camping vehicles travel to a different area that has occurred at previous events. However, the new camping area would be serviced by a number of internal access roads, and impacts on internal travel time is likely to be negligible.



The traffic assessment notes that if the venue was unable to accommodate currently approved numbers of campers due to the reduction of the camping area (as a result of the increase of the festival precinct), then it would result in adverse traffic impacts as a result of:

- fewer campers travelling to the site on the pre-event days and leaving on the post-event day, outside peak traffic times;
- more day patrons travelling to and from the site on the peak event days, during peak traffic times; and
- increased demand on the bus network to accommodate more day patrons.

As such, the proposed modification is expected to reduce the risk of off-site traffic impacts, by ensuring that the maximum number of campers can be accommodated on site during events.

The traffic assessment concludes that the proposed modification would have negligible impact on the existing transport impacts of the project, because it would:

- not change the number of trips or how the patrons arrive and depart the site;
- be serviced by a network of internal roads; and
- include provision/space for camping unloading and vehicle inspection.

5.8 Infrastructure, Services and Waste

The proposed modification does not involve any change to the maximum capacity of patrons or campers attending events at the site. Given the same numbers of patrons and campers would utilise the venue and the surrounding infrastructure such as roads, etc. as currently approved, the proposed modification would not result in any significant increase in the demand on local infrastructure and services.

Waste and recycling generation rates would also remain the same as currently experienced.

Wastewater generation, which is currently disposed of to a licensed liquid waste facility would also not increase, given that the patron and camper capacities would not increase. No permanent wastewater or amenity facilities are proposed to be installed within the campground expansion area, with only fully-self contained temporary facilities proposed to be located in the area during events. It is noted that no liquid waste from events at Parklands is currently directed to any Council sewage treatment plant, nor is it proposed to. As such, the proposal is not expected to result in any material change to infrastructure, services or waste management associated with the approved development.

5.9 Hazards

The proposed modification does not involve any change to the maximum capacity of events on the site. As such, the proposal is not expected to result in any material change to bushfire, dangerous goods management or other hazards associated with the approved development.

With respect to bushfire emergency evacuation, the proposed campgrounds are located within the footprint of the existing bushfire emergency assembly area, and it is proposed to relocate the assembly area immediately to the east of the proposed campground expansion area.

The expansion of the campgrounds would facilitate and/or incorporate the following improvements to current bushfire firefighting and evacuation strategies on the site:

- camping densities per person would improve (from currently 19 square metres to 21 square metres), and thereby result in greater separation distances between individual campsites;
- all campgrounds would be an amenable distance from the bushfire emergency assembly area (ie. maximum of 750 metres);
- a dedicated 12 to 19 metre wide evacuation route would be implemented through the existing northern campgrounds (in a north-south direction) towards the assembly area;



- the three east-west oriented roads in the proposed campgrounds all lead to the assembly area;
- 28 new dedicated 10,000 litre static firefighting tanks fitted with Stortz valves would be located in the proposed campgrounds; and
- all general pedestrian walkways throughout the campground would be increased in width from currently 1.5 metres to 2.5 metres thereby allowing firefighting appliance access and increased camp site separation.

To implement these measures, and manage hazards and risks associated with the ongoing operation of the Parklands project, Parklands would implement the following measures in accordance with the development consent and its existing management plans:

- update and subsequently implement the:
 - Event Management Plan, to manage events and associated hazards and risks. The plan would include (amongst other things):
 - Occupational Health & Safety (OH&S) Management Plan;
 - Event Emergency Evacuation Plan;
 - Medical Plan;
 - Camping Management Plan (for applicable events); and
 - Temporary Structures Plan;
 - Bushfire Management Plan and Bushfire Emergency Evacuation Plan, to manage bushfire hazards and risks; and
 - Flood Risk Management Plan and Flood Evacuation Plan, to manage flood related hazards and risks;
- maintain asset protection zones (APZs) of at least 10 metres to unmanaged bushland on site;
- ensure dangerous goods and hazardous substances storage and handling on site is undertaken in accordance with the Dangerous Goods Code and *AS 1940-2004: The storage and handling of flammable and combustible liquids*;
- continue to monitor hazards and risks through the RWG, which includes representatives from the RFS, SES and NSW Police;
- continue to undertake hazards and incident simulations and exercises, in collaboration with emergency services authorities; and
- provide detailed security, medical, police and emergency service personnel during events (in accordance with the Event Management Plan), which is funded by Parklands on a pay-for-service basis as required.

The Bushfire Emergency Evacuation Plan has been updated to reflect the proposal and is attached as **Appendix D**.

5.10 Social and Economic

The proposed modification does not involve any change to the maximum capacity of events on the site, or any change to patron or camper numbers.

As such, the proposal is not expected to result in any change to the social and economic impacts of the approved project.

The expanded camping area would improve the space available for campers on site, increasing camping space per person from the current 19 square metres per person to 21 square metres per person. This would improve amenity for camping patrons on the site.

The expanded camping area would also free up more room within the event area for the ancillary attractions associated with the events, which as outlined in Section 2.3 include a number of socially-responsible cultural, arts and education based elements. These attractions would assist in improving the amenity for all patrons and campers on the site, and the wider culture and arts industry in general.



6 CONCLUSION

Environmental assessment indicates that the proposed modification would involve minimal environmental impact, and that the modified North Byron Parklands project would remain substantially the same as the approved project.

Consequently, and having regard to the salient environmental, social and economic issues, it is considered that the proposed modification represents continued orderly use of the land. It is respectfully requested that the Department, having due regard for the information submitted in this document, grants approval to the proposed modification.