

David Koppers  
Team Leader  
NSW Independent Planning Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear David

Thank you for your correspondence regarding the proposed amendment to State Environmental Planning Policy (State Significant Precincts) 2005 in relation to Luna Park. You requested a summary of the key issues raised by the public during the formal exhibition period between 14 October and 9 November 2018.

The Department of Planning and Environment has received 1,407 submissions, with over 90% in support of the proposed amendment (see the below table). There were no submissions received from public agencies.

Sentiment	Number of Submissions
<b>Positive</b>	1272
<b>Negative</b>	100
<b>Comments</b>	35
<b>Total</b>	1407

I have provided a summary of the key points in the submissions that support the proposed amendments (**Attachment A**), as well as the key points raised in the submissions concerned with, or objecting to, the proposed amendments (**Attachment B**).

If you have any more questions, please do not hesitate to contact Ben Lusher, Director Planning Frameworks on 9274 6552.

Yours sincerely



**Alison Frame**  
**Deputy Secretary**  
**Policy and Strategy**

Encl: Attachments A and B - Summary of key themes raised in submissions

23/11/2018

## Attachment A - Summary of submissions in support

- **An iconic landmark destination with significant cultural heritage value.** Submissions expressed support for retaining Luna Park as a significant cultural icon with important heritage and historical values. These submissions support the proposed amendment expressing a view it will help to ensure the survival of Luna Park. Several submissions (some from self-identified tourists) stressed the importance of retaining a functioning Luna Park as a tourist destination, recognising it as an iconic Australian landmark.
- **Diversity of experience.** Submissions from the community supported the amendment expressing a view it helps to expand the rides and amusements on offer at Luna Park. Luna Park was seen as needing to introduce new rides and amusements from time to time to maintain interest and excitement and provide an enjoyable experience for returning patrons.
- **Encouraging safety.** Support for the proposed amendment was expressed because of a view the new provisions would facilitate safer rides and amusements by encouraging Luna Park to replace aging rides and amusements by removing the need for a development consent every time it does so.
- **Nostalgia and intergenerational preservation.** Many submissions declared support for the proposed amendment to safeguard the preservation of Luna Park for future generations to enjoy. Many of these submissions detailed childhood memories and identified Luna Park as an important leisure activity for children to experience. These submissions offered support for the proposed amendments to ensure Luna Park remains viable and open into the future.

## Attachment B - Summary of Key Concerns

The below key concerns are listed in order of the number of submissions raising the issue:

- **Lavender Green:** Submissions raised concerns with the inclusion of Lavender Green in the proposed rides and amusements zone which was perceived to be important open space to be retained for community access and use. These submissions were also concerned with general amenity (height, noise, light) impacts resulting from siting rides and amusements on Lavender Green – (see below).
- **Plan of Management:** Submissions expressed a view the 1998 Luna Park Plan of Management is the most appropriate tool for guiding the management of Luna Park, with extensive consultation having contributed to its composition. These submissions suggested the Plan of Management be made statutory and used as the basis for managing rides and amusements. A number of these submissions also suggested the proposed provisions were inconsistent with the Plan of Management.
- **Height:** These submissions either requested height limits be reduced or were generally opposed to the height limits (both for exempt and complying development). Where reasons were provided, these submissions objected on the grounds of impacts to livability such as noise and visual impacts, inconsistency with Plan of Management heights, or inappropriate placement of rides considering heights (for example, on Lavender Green where the cliff face is lower than the area adjacent to the Midway).
- **Light:** Submissions raised concern with the possible light impacts of new rides and amusements introduced under the proposed provisions.
- **Noise:** Submissions raised concern with noise impacts resulting from new rides and amusements introduced under the proposed provisions.
- **Compliance with Australian Standards, fire and ride safety:** Submissions raised concern that the proposed provisions would exempt any future development from complying with relevant Australian Standards for fire and ride safety. These submissions suggested that compliance with these Standards could only be achieved through the development application process.
- **Development application process and community consultation:** Submissions objected to the removal of the development application (DA) process resulting from the introduction of exempt and complying development. These submissions cited a reduction in community consultation compared to the DA process.
- **Future development:** These submissions were concerned that the proposed provisions could be applied to other types of development such as hotels or apartments.