

OBJECTION to DA 25/7071 – Penrith Lakes Tourism-Oriented Concept & Early Works

1. Statement of Objection

- 39,000 m² development: 7-storey hotel, 3-storey registered club, shopping centre with drive-thrus, 500+ car spaces
 - Within 500 m of Waterside Estate
 - Assessed as **State Significant Development** – bypasses local council
 - **No meaningful community consultation** to date
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2. Governance & Licensing Concerns

- No club licence exists for the site (Liquor & Gaming NSW register)
 - No named operator disclosed
 - No confirmation of governance under *Registered Clubs Act 1976*
 - No disclosure on poker machines **Risks:**
 - Potential conversion to private gaming venue
 - No community benefit obligations
 - Lack of probity checks
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3. Gaming Approval Loophole

Approval Model	Area Classification	LIA Requirement
Previous (SA4)	Penrith = Band 3 (Red Zone)	Full LIA required
Current (SA2)	Old Castlereagh Rd = Band 1 (Green Zone)	No LIA required

Implication: Large-scale gaming could be allowed with minimal scrutiny.

4. Budget Credibility

Project	Size (sqm)	Cost	Cost/m ²
Panthers Carpark	3,600	\$19.1m	\$5,306
WSCC & Pullman	18,250	\$100m+	\$5,479
Log Cabin	2,500	\$35m	\$14,000
Cranebrook Village	6,633	\$18m	\$2,712
DA 25/7071	39,000	\$80m+	\$2,051

Observation: Cost/m² is 2.7× lower than local benchmarks → budget may be understated.

5. Tourism-Zoned Land Consumption

- Total SP3 Tourist land in Penrith Lakes: ~250–300 ha
- Remaining undeveloped SP3 land north of Old Castlereagh Rd: ~60 ha
- DA 25/7071 footprint: 3.9 ha → ~6.5% of remaining SP3 land

DP Number	Lot	Area	Address	Status	Zoning
DP 1068323	Lot 1	~10 ha	Adjacent to DP 1068322	Vacant	SP3 Tourist
DP 1068324	Lot 1	~12 ha	North of Whitewater Stadium	Undeveloped	SP3 Tourist
DP 1068325	Lot 1	~10 ha	Near Andrews Rd	Vacant	B7
DP 1068326	Lot 1	~15 ha	Northern foreshore	Partially vegetated	SP3 Tourist

6. Socio-Economic Harm Risk

- Penrith LGA gaming losses (2023): \$223.2 m
 - Per adult: ~\$1,301/year
 - Per household: ~\$2,750/year (~2.8% of income)
 - Cranebrook SA2: Lower SEIFA decile → higher vulnerability **Risks:**
 - Increased exposure to gaming/alcohol
 - Disproportionate harm to vulnerable groups
 - Cumulative public health impacts
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7. Environmental Impacts

Threatened Ecological Communities:

- Cumberland Plain Woodland (Critically Endangered)

Threatened Fauna:

- Grey-headed Flying-fox
- Powerful Owl
- Eastern Bent-wing Bat
- Eastern Freetail-bat
- Black-necked Stork

Risks:

- Habitat loss, corridor fragmentation
- Breeding disruption
- Light/noise impacts

Mitigation Options:

- Retain mature trees, buffer zones
 - Seasonal clearing restrictions
 - Low-impact lighting
 - Biodiversity offsets
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8. Traffic & Heritage Concerns

- Access road passes through **Heritage Conservation Area 261 – Penrith Concerns:**
 - Increased wear on heritage road fabric
 - Visual/structural impacts from signage and widening
 - No Heritage Impact Statement provided **Recommendations:**
 - Heritage-sensitive traffic controls
 - Limit heavy vehicle access during peak hours
 - Use heritage-appropriate materials
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9. Recommended Conditions if Approved

Gaming & Alcohol Controls

- Cap poker machines
- Restrict weekday gaming to 10 am–10 pm
- Cease gaming/alcohol after events
- Annual independent audits

Noise & Traffic

- Weekday outdoor noise cutoff 10 pm
- Traffic management plans
- Safe pedestrian/cycle links

Environmental

- Fauna rehousing
- Vegetation regeneration
- Stormwater/litter capture
- Annual water quality reporting

Community Benefit

- Co-fund Waterside open space upgrades
 - Contribute to waterway maintenance
 - Establish community facilities fund
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10. Exhibition Period

- Exhibition: 14 days (5–18 Sept 2025)
 - 40+ technical documents
 - Smaller DAs (<10 docs) had 28-day exhibitions
 - **Impact:** Severely limited community review time
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11. References

1. NSW Planning Portal – DA 25/7071 documents
2. Liquor & Gaming NSW – Licence register
3. Penrith Lakes DCP – Stage 1
4. SEPP (Precincts – Western Parkland City) 2021
5. ABS 2021 – SA2 and SEIFA data
6. Penrith City Council – Biodiversity mapping
7. NSW Heritage Register – Conservation Area 261
8. Penrith Lakes Employment Lands Subdivision (DA9876)
9. Biodiversity Conservation Act 2016
10. Gaming Machines Act 2001
11. Registered Clubs Act 1976
12. Environmental Planning and Assessment Act