

Our ref: MP09_0074-Mod-3

Mr Brad Searle
Executive General Manager Development
Bingo Recycling Pty Ltd
305 Parramatta Road
AUBURN NSW 2144

13 November 2025

Subject: Request for Additional Information - MP09_0074-Mod-3

Dear Mr Searle

I refer to the Department of Planning, Housing and Infrastructure's (the Department) letter on 28 October 2025, which advised that the Department would be providing comments following the exhibition of the modification report for the Orchard Hills Waste Facility Modification 3 (MP09_0074-Mod-3).

As part of your response to submissions (RtS) report addressing submissions and advice received during exhibition of your application, the Department requests you provide a response to the issues include in **Attachment 1** to this letter.

If you have any questions, please contact Ellen Luu on (02) 8275 1037 or via email at ellen.luu@planning.nsw.gov.au.

Yours sincerely



Joanna Bakopanos

**A/Director
Industry Assessments**

as delegate for the Planning Secretary

Attachment 1

General

1. The modification seeks to increase extraction to 500,000 tonnes per annum with no changes to the approved physical layout of the site. However, no evidence has been provided to demonstrate that this extraction rate can be achieved within the existing infrastructure, workforce and approved operating hours. Please provide further details on the following:
 - typical daily and weekly extraction and dispatch rates (tonnes/day and tonnes/week), and associated vehicle loading and turnaround times,
 - throughput capacity of existing machinery,
 - adequacy of internal haul roads and whether sealing or upgrades are required,
 - any proposed changes to workforce numbers or operating shifts.
2. The modification report identifies a landfill airspace deficit as justification for the proposed extraction increase but does not outline indicative timeframes for completion of extraction within each cell or the transition from quarrying to landfilling. Please clarify the following:
 - which cell(s) the extraction increase will occur in,
 - the sequencing, staging of works (i.e. commencement and completion timeframes for each cell),
 - how landfill lining and filling sequencing will be managed in conjunction with the quarry extraction activities.
3. Please provide a projection of total landfill airspace (m³) compared to cumulative landfill inputs under the proposed 500,000 tpa extraction rate. Include clarification on any revised landfill lifespan, closure dates and rehabilitation timeframes.
4. Identify the end use or destination of excavated shale/clay materials from the site.
5. The modification report notes consultation with the Environment Protection Authority, Transport for NSW and Penrith City Council (Council), and references a community liaison meeting held on 22 May 2025. However, there is no evidence of engagement with other nearby key stakeholders, including Sydney Metro (Orchard Hills Stabling and Maintenance Facility, OHSMF), the Alsip Industrial Business Park (AIBP), or nearby residents (e.g. The Vines Estate). The Department requests that the Applicant undertakes further consultation with these stakeholders and provides a summary of feedback and outcomes.

Traffic

6. The Traffic Impact Assessment (TIA) assesses the Luddenham Road/Patons Lane and Luddenham Road/Mamre Road intersections but does not consider construction and

operational traffic associated with the AIBP and OHSMF. Please revise the assessment to include these concurrent operational scenarios.

7. Provide a summary table identifying heavy vehicle types used to transport excavated clay and shale off-site, including their average load capacities and expected trip frequencies.
8. The TIA relies on delivery of the Patons Lane/Luddenham Road intersection upgrade, proposed under a Voluntary Planning Agreement (VPA) between Council and AIBP. Further consultation with Council and AIBP is required to confirm the following:
 - whether the intersection design and traffic modelling accommodate the additional truck movements associated with the modification,
 - any interim measures proposed should delivery of the intersection upgrade be delayed.
9. Additional assessment is required to determine whether the increased heavy vehicle volumes would affect the operational performance or safety of the proposed intersection upgrade. The Applicant should identify any necessary mitigation measures or staging adjustments.
10. The TIA states that vehicles will not queue on Patons Lane, however no supporting evidence has been provided. Please provide further details on the following:
 - on-site queuing and swept path analyses for the largest vehicle type expected during peak operations,
 - evidence that all heavy vehicles can be accommodated within the site boundary under worst-case conditions,
 - details of site monitoring and management arrangements to prevent off-site queuing on Patons Lane.

Air Quality

11. The Air Quality Impact Assessment (AQIA) predicts minor incremental impacts but does not describe ongoing air quality mitigation and monitoring arrangements for the modification. Please provide further information on any changes to the following:
 - dust suppression measures and operational protocols
 - air quality monitoring locations, parameters and frequency
 - contingency actions to be implemented under adverse meteorological conditions (e.g. high winds, dry conditions).

Noise

12. Provide a noise contour map illustrating predicted noise levels from site operations in relation to surrounding land uses.

13. Confirm whether the noise model has been validated against operational noise monitoring data.

Water Management

14. The report assumes no changes to the water management system despite the proposed increase in extraction and truck movements. Additional information is required to demonstrate that the site's existing water management infrastructure can accommodate increased dust suppression demands and sediment loads. Please provide a revised water balance model for site operations that reflects any additional water demands associated with the modification.
15. Confirm the expected timeline for commissioning of the approved leachate treatment plant.