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Modification Application - MP09_0074-MOD 3

**Orchard Hills Waste Facility - Increase clay/shale extraction dispatch limit.
123-179 Patons Lane, Orchard Hills**

10 November 2025

Dear Ellen,

Sydney Metro welcomes the opportunity to comment on the Orchard Hills Waste Facility State Significant Development Modification Application (MP09_0074-MOD-3) at 123-179 Patons Lane, Orchard Hills, submitted by SRC Operations Pty. Ltd.

The Sydney Metro – Western Sydney Airport (SMWSA) project is a Critical State Significant Infrastructure (CSSI) project, which is an interfacing development with the Patons Lane Resource Recovery Centre and Landfill Facility (aka Bingo). The Sydney Metro Stabling and Maintenance Facility (SMF) is an interfacing development that is currently in construction phase. The sole access for the SMF for construction and delivery of rolling stock is from Patons Lane, and therefore, resolution of traffic issues related to the development of this site is essential to ensure the successful operation of the Metro in future.

Sydney Metro would like to raise with the Department of Planning, Housing and Infrastructure (DPHI) that the timing of this modification directly coincides with Sydney Metro's rolling stock deliveries, operational testing and commissioning and the ramp up of resourcing and occupation of the SMF by the Operation and Maintenance Contractor. The vehicular access route proposed by Bingo is identical to that of the SMF, therefore giving cause for significant concern by Sydney Metro.

Sydney Metro acknowledges the important operations of the site to allow for continuing landfill operations. However, Sydney Metro as a CSSI project, requests that DPHI ensure priority is given to Sydney Metro's use of Patons Lane during its AM and PM peak construction hours, and this must be clearly documented in any Construction Traffic and Pedestrian Management Plans (CTMP) associated with the waste facility.

The following comments and recommendations are provided for your consideration:

1. Modification Report (Revision 3 dated 17 September 2025)

(a) Site Description (Page 5)

- **Sydney Metro Western Sydney Airport (SMWSA)**

- The SMWSA development including the Stabling and Maintenance Facility, is not identified or referenced within the site description summary as an adjoining landowner or interfacing stakeholder. This omission raises concerns regarding the extent to which the SMWSA project has been appropriately considered as part of the detailed assessment.
- Given that Sydney Metro is an adjacent government infrastructure project, the site description and zoning mentioned are not accurately discussed in Section 2.3.1. The zoning and description refers to the Orchard Hills Stage 1 rezoning information and not the current state.
- **Alspec Industrial Business Park (AIBP)**
 - The Alspec Industrial Business Park is not mentioned in the site description summary as an interfacing development on Patons Lane.
 - Given that the AIBP is a significantly large development currently under construction with significant cumulative construction impacts, the Report should include a reference to AIBP in the site description as a significant interfacing development.
 - Notwithstanding the above, the Alspec development is referenced under Section 7.3.1 - Operational Impacts, indicating a lack of alignment between sections in the Report.

Recommendation:

The site description should be updated to accurately reflect:

- **The adjacent SMWSA, its proximity, and potential interface with the subject site; and**
- **The AIBP given its relevance to the local context and potential cumulative construction impacts.**

(b) Section 7.3.1 – Operation impacts

The report indicates that *"no specific data was available for the Luddenham Road/Patons Lane intersection"*. Sydney Metro suggests the Applicant utilise the traffic data that was provided as part of the Traffic Impact Assessment and Construction Traffic Management Plan for the Alspec Industrial Business Park Earthworks and Clearing development application (DA24/0294 - Penrith City Council) in their model, as this contains the cumulative traffic volumes for the Luddenham Road/Patons Lane intersection for the time period identified in the Applicants 'Future Base Case Scenario in 2026', including background, SMF and AIBP-related traffic volumes. These volumes should be applied across all modelling and traffic impact analysis undertaken and submitted as part of this modification.

Recommendation:

The Report should be updated to utilise specific traffic data for the Luddenham Road and Patons Lane intersection. The Applicant can undertake their own traffic data analysis or use traffic data that has been provided as part of the Traffic Impact Assessment and Construction Traffic Management Plan for the Alspec Industrial Business Park Earthworks and Clearing development application (DA24/0294 - Penrith City Council) in their model.

- **Appendix B Consultation**

As a critical infrastructure project currently under construction, with its sole access via Patons Lane, Sydney Metro as an important interfacing stakeholder was not consulted on the modification application and was not offered the opportunity to provide input or raise concerns.

Recommendation:

Sydney Metro would welcome a meeting with the Applicant and/or Bingo representatives to discuss Sydney Metro’s concerns.

(c) Appendix C Traffic Impact Assessment (TIA)

The TIA report prepared by SCT Consulting refers to a traffic survey conducted on 13 November 2024 during the AM and PM periods at the Luddenham Road / Patons Lane and Mamre Road / Luddenham Road intersections. The AM and PM peak hours were detailed as 7:30am – 8:30am and 4:15pm – 5:15pm.

A review of the construction traffic data of the SMF confirms the day to be of typical construction traffic volume. However, the applicant did not provide any validation of whether the traffic survey data represented a typical day of operations at Bingo, and whether the traffic associated with Bingo is the full 256 movements approved or not.

Table 2-1 Peak hour traffic volumes

Approach	Movement	AM peak hour			PM peak hour		
		LV	HV	Total	LV	HV	Total
Luddenham Rd Patons Ln intersection							
Luddenham Rd (South)	L	8	2	10	2	0	2
	T	448	15	463	286	8	294
Luddenham Rd (North)	T	180	23	203	529	17	546
	R	25	14	39	4	4	8
Patons Ln (West)	L	9	15	24	62	6	68
	R	5	3	8	16	4	20
Total	-	675	72	747	899	39	938

Table 2-2 2024 Base year - Intersection performance

Peak	Volume	DoS	Average delay (s)	LoS
Luddenham Rd Patons Ln intersection				
AM	747	0.25	26.5	B
PM	938	0.30	29.8	C
Mamre Rd Luddenham Rd intersection				
AM	2,198	0.60	24.2	B
PM	2,290	0.96	55.5	D

Forming part of the proposed Bingo Modification Application is the increase in heavy vehicle movements from 256 to 570 movements per day. This equates to a net daily increase of 314

heavy vehicle movements, equating to an extra 157 trucks arriving to site, and 157 trucks leaving the site each day. As outlined in Section 3.2 of the TIA, a peaking factor of 1.25 has been applied, with an estimated peak of 19.6 heavy vehicles per hour, which has been rounded up to 20 trucks per hour in each direction. The modification would lead to an additional 40 heavy vehicle movements during a peak hour.

As identified in Section 3.3 of the TIA, the vehicle access route is expected to be right in from Luddenham Road into Paton's Lane and left out of Paton's Lane onto Luddenham Road. The vehicle access route is identical to the approved heavy vehicle haulage route associated with the approved Construction Traffic Management Plan (CTMP) for the SMF.

Section 4 of the TIA provide details of the future base year, being 2026. The assessment assumes an additional volume associated with the MOD to the 2024 surveyed traffic volume. Whilst the TIA acknowledges and references the Alspec Development and the Sydney Metro Western Sydney Airport SMF, the analysis did not provide any details if the survey data represented the fully approved traffic volume associated with Bingo operations, and did not consider the cumulative construction traffic impact of the SMF based on the maximum EIS construction traffic volumes, or the cumulative construction traffic impact associated with the Alspec SSDA and approvals.

It is considered that the SIDRA analysis therefore did not adequately allow for the cumulative traffic impacts sufficiently at the Luddenham Road / Paton's Lane intersection, with the forecasted increase in traffic volumes during the AM and PM peak period likely to exacerbate the delays at the Luddenham Road / Paton's Lane intersection and may impact SMF construction traffic movements.

Table 4-1 Future base year volumes for 2026

Approach	Move- ment	AM peak hour			PM peak hour		
		LV	HV	Total	LV	HV	Total
Luddenham Rd Patons Ln intersection							
Luddenham Rd (South)	L	8	2	10	2	0	2
	T	486 (+38)	24 (+9)	510 (+47)	323 (+37)	11 (+3)	334 (+40)
Luddenham Rd (North)	T	229 (+49)	26 (+3)	254 (+51)	554 (+25)	21 (+4)	575 (+29)
	R	25	14	39	4	13 (+9)	17 (+9)
Patons Ln (West)	L	9	15	24	62	13 (+7)	75 (+7)
	R	5	3	8	16	4	20
Total	-	762 (+87)	84 (+12)	845 (+98)	961 (+62)	62 (+23)	1,023 (+85)
Mamre Rd Luddenham Rd intersection							
Mamre Rd (South)	L	40 (+18)	11	51 (+18)	235 (+14)	4	239 (+14)
	T	499 (+104)	90(+12)	589 (+116)	875 (+109)	44 (+5)	919 (+114)
Mamre Rd (North)	T	966 (+90)	111(+17)	1,076 (+106)	538 (+34)	69 (+15)	607 (+49)
	R	224 (+31)	32(+3)	255 (+33)	329 (+11)	23 (+4)	353 (+16)
Luddenham Rd (West)	L	271 (+22)	25(+6)	296 (+28)	333 (+19)	13 (+3)	347 (+23)
	R	237 (+16)	14(+3)	251 (+19)	54 (+18)	5 (+0)	59 (+18)
Total	-	2,236 (+280)	282 (+40)	2,518 (+320)	2,364 (+205)	159 (+28)	2,522 (+232)

Note: Values in bracket indicate additional volume in 2026 future base compared to 2024 survey volumes

Table 4-2 AM and PM Peak hour traffic volumes with modification traffic

Approach	Movement	AM peak hour			PM peak hour		
		LV	HV	Total	LV	HV	Total
Luddenham Rd Patons Ln intersection							
Luddenham Rd (South)	L	8	2	10	2	0	2
	T	486	24	510	323	11	334
Luddenham Rd (North)	T	229	26	254	554	21	575
	R	25	34 (+20)	59 (+20)	4	33 (+20)	37 (+20)
Patons Ln (West)	L	9	35 (+20)	44 (+20)	62	33 (+20)	95 (+20)
	R	5	3	8	16	4	20
Total	-	762	124 (+40)	885 (+40)	961	102 (+40)	1,063 (+40)
Difference (%)	-	-	47.8%	4.7%	-	64.3%	3.9%
Mamre Rd Luddenham Rd intersection							
Mamre Rd (South)	L	40	16 (+5)	56 (+5)	235	7 (+3)	242 (+3)
	T	499	90	589	875	44	919
Mamre Rd (North)	T	966	111	1,076	538	69	607
	R	224	47 (+15)	270 (+15)	329	40 (+17)	370 (+17)
Luddenham Rd (West)	L	271	38 (+13)	309 (+13)	333	27 (+14)	361 (+14)
	R	237	21 (+7)	258 (+7)	54	11 (+6)	65 (+6)
Total	-	2,236	322 (+40)	2,558 (+40)	2,364	199 (+40)	2,562 (+40)
Difference (%)	-	-	14.2%	1.6%	-	25.2%	1.6%

Note: Values in the bracket indicate the traffic volume associated with the modification

Table 4-3 Intersection of Luddenham Road | Patons Lane performance summary

Scenario	Volume (vehs)	DoS	Average delay (s)	LoS
Base year (2024)				
AM	747	0.25	26.5	B
PM	938	0.30	29.8	C
Future base (2026)				
AM	846 (+99)	0.28 (+0.03)	32.3 (+5.7)	C
PM	1,023 (+85)	0.32 (+0.02)	35.3 (+5.5)	C
Future base + modification traffic (2026)				
AM	886 (+40)	0.28 (+0.00)	34.7 (+2.4)	C
PM	1,063 (+40)	0.32 (+0.00)	38.0 (+2.8)	C

Note: Values in the bracket indicate the change associated with the modification

Recommendation:

1. The applicant is to validate whether the traffic survey data represented a typical day of operations at Bingo, and whether the traffic associated with Bingo is the full 256 movements approved or not, and this should be made clear as part of the traffic survey volumes data input.
2. Sydney Metro requests the Applicant to provide more information around vehicle movements anticipated within the peaks versus outside of the peak periods, including any counts undertaken. Sydney Metro needs to understand how the x1.25 factor was identified and if it is an accurate representation of the split between on-peak and off-peak vehicle movements.

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- The SIDRA analysis did not provide any detail on whether the survey data represented the fully approved traffic volume associated with Bingo operations, and did not consider the cumulative construction traffic impact of the SMF based on the maximum Environmental Impact Statement construction traffic volumes, or the cumulative construction traffic impact associated with the Alspec SSDA and approvals. This information must be provided.

General comment:

- The TIA assumes the Patons Lane upgrade being completed in 2026 Future Base Case Scenario to justify that the modification application will have negligible impacts. At the time of writing this submission, the Development Application for the Patons Lane upgrade works has yet to be lodged with Penrith City Council.
- Please be advised Sydney Metro is planning a crossing of Patons Lane to complement the Active Transport Corridor from Orchard Hills Road to the Warragamba Pipeline. The crossing is planned to be on the Luddenham Road side of the Sydney Metro viaduct and will be proximate to the entrance to the Bingo site. It is requested that any future submissions from Bingo address how they will contribute to ensuring the safety of pedestrians and cyclists on the crossing, for example by local instructions to truck drivers to be alert for pedestrians and cyclists. In addition, the Bingo Modification has not taken into consideration the future Active Transport Corridor and future users (i.e. the SMF will have end-of-trip facilities and interface with pedestrians and cyclists travelling to and from the SMF should be considered as part of the application).
- Sydney Metro oversize overmass (OSOM) vehicles are expected to access the SMF site during early to mid-2026, for deliveries of large items such as rolling stock, transformers and other large components. It is important that delivery of these items is not delayed.
- The SMF's operational performance depends on consistent and unimpeded access via Patons Road, the facility's sole vehicular access point. Any increase in heavy vehicle (HV) traffic resulting from the proposed BINGO operations has potential implications for access, logistics, and emergency response capability.
- Increased HV movements or any degradation of Patons Road may have a material impact on the SMF's operations, including restricted access for deliveries, maintenance logistics and delays in personnel mobilising to incidents elsewhere on the network.
- Sydney Metro does not support the modification in its current form until such time as the above information in this letter is addressed.

Please contact Vanessa Cagliostro Manager Urban Planning via email at vanessa.cagliostro@transport.nsw.gov.au should you have any further inquiries on this matter.

Sincerely,



Lara Maree Dominish

Director Place Making and Property

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