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Blacktown
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13/03/2026

Dear Joanna,

STATE SIGNIFICANT DEVELOPMENT MP09_0074 MOD 3 – RESPONSE TO ADDITIONAL COMMENTS ON THE RESPONSE TO SUBMISSIONS

Background

SRC Operations Pty Ltd (SRC Operations), a wholly owned subsidiary of Bingo Industries Limited (Bingo), own and operate the Patons Lane Resource Recovery Centre and Landfill (PLRRCL) located at 123 - 179 Patons Lane, Orchard Hills, New South Wales (NSW) (the site). SRC Operations are seeking approval under Section 4.56 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) to modify (the modification) State Significant Development (SSD) consent MP09_0074 (the consent) to:

- Increase the maximum approved extraction and despatch limit for clay and shale from 160,000 tonnes per annum (tpa) to 500,000 tpa.
- Increase the maximum approved daily truck movements from 256 to 570 to accommodate the increased extraction limit.

A modification application was submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) on 23 September 2025 and placed on exhibition from 14 October 2025 to 27 October 2025. A response to submissions report was then prepared and submitted to DPHI on the 16 January 2026.

On 13 February 2026, additional comments were received from DPHI, Penrith City Council and Sydney Metro. This letter has been prepared to respond to these additional comments.

Department of Planning, Housing and Infrastructure

Comment	Response
The Department notes the modification relies on the delivery of the Luddenham Road / Patons Lane intersection upgrade (DA25/0955), which is not yet approved. Council and Sydney Metro have advised that the existing intersection does not have capacity to accommodate cumulative traffic from the proposed modification, AIBP and SMSMF prior to the intersection upgrades. The Department has also identified inconsistencies between the traffic survey data and Level of Service results in the revised Traffic Impact Assessment (TIA) provided in the Submissions Report compared with traffic data presented in DA25/0955.	SRC Operations acknowledges the Department's observations and confirms that the reference in the RTS Report to DA25/0955 being "approved" was a typographical error. DA25/0955 remains under assessment by Penrith City Council and has not yet been determined. Importantly, SRC Operations does not rely on the intersection upgrade being in place to support operation of the modification proposal. In direct response to the concerns raised by Sydney Metro and Council regarding the adequacy of the traffic survey data, updated traffic modelling has been prepared by SCT Consulting (February 2026) provided at Attachment A. The updated modelling adopts the March 2025 survey data used in the AIBP DA25/0955 traffic impact assessment (TIA) — the most current available dataset incorporating Sydney Metro construction traffic — as the baseline for all cumulative assessment scenarios. This directly resolves the data inconsistency identified by the Department. It is also important to note that all parties — SRC Operations, Sydney Metro and the AIBP proponent — agree that once the proposed intersection upgrade is delivered, there are no

remaining capacity constraints for traffic at the Luddenham Road/Patons Lane intersection.

Any performance issues at the intersection prior to the upgrade are therefore temporary and short-term in nature.

Importantly the revised traffic assessment provided at Attachment A demonstrates that the cumulative traffic from the proposed modification, AIBP and SMSMF can be safely accommodated prior to the proposed Patons Lane / Luddenham Road intersection upgrade with the Modification Proposal having no impact on the intersection during the PM network peak period when accounting for mitigation.

1.

i. Demonstration of how traffic generated by the modification can be safely and efficiently accommodated prior to the intersection upgrade being delivered.

The updated modelling (SCT Consulting, February 2026) demonstrates that the modification's contribution to intersection traffic is minor across all modelled scenarios. The 40 additional peak-hour vehicle movements represent less than 5% of total intersection traffic.

In the AM peak hour, intersection performance remains at LoS E with a minor increase in delay (60.5 to 67.8 seconds) and a queue increase of less than one truck length (17 m to 24 m) on the Patons Lane approach. Critically, through traffic on Luddenham Road and turning movements into Patons Lane continue to operate at LoS A in all scenarios, meaning the modification has no material impact on the

public road network or on access into the Sydney Metro stabling yard and AIBP.



Importantly, the LoS F condition on the Patons Lane exit approach does not impede inbound access to either the Metro stabling yard or the AIBP. Patons Lane operates as a two-way road with a dedicated lane in each direction and has been designed and constructed to accommodate heavy vehicles including B-doubles. The nearest site access driveway is approximately 560 m from the Luddenham Road

intersection, with the next access point over 1 km from the intersection. Any queuing on the Patons Lane exit approach falls short of these access points and therefore cannot physically obstruct inbound delivery or workforce movements. Delivery vehicles and construction traffic accessing the Metro stabling yard or AIBP via Patons Lane will continue to do so without delay or impediment.

In the PM peak hour, the Patons Lane approach already exceeds capacity (DoS >1.0) under the cumulative baseline, driven by right-turning construction traffic from the AIBP and Sydney Metro projects. To ensure the modification does not contribute to this congestion, SRC Operations commits to a condition of consent restricting all extraction-related truck departures (i.e. additional modification movements and existing approved extraction numbers) during the PM network peak period (after 4:30 pm on weekdays), until the intersection is upgraded to a signalised operation. With this restriction in place, the modification adds no additional traffic to the intersection during the PM peak period. This commitment is operationally practical, noting the BINGO site weighbridge currently ceases accepting inbound loads at 4:30 pm on the basis that the site authorised hours of operation are 7am to 5pm, and is aligned with the equivalent peak-period restriction applied to AIBP construction vehicles under the CTMP.

SRC Operations commits to updating its Site Traffic Management Plan and Transport Code of Conduct to include specific protocols for managing BINGO traffic during both Sydney Metro's peak

	construction timeframes, the period of intersection upgrade construction works and OSOM / deliveries. Outside the PM peak period, the modification's impacts on the intersection are minor and manageable within the existing intersection configuration. Note that the peak construction periods for both the AIBP and Sydney Metro facilities have passed and in reality, the number of vehicles utilising the Patons Lane / Luddenham Road intersection is likely to be less than has been modelled.
ii. review and/or resolution of conflicting traffic datasets, including consideration of more recent cumulative traffic survey data recommended by Sydney Metro, with justification for the dataset to be adopted.	The updated modelling (SCT Consulting, February 2026) adopts the March 2025 survey data used in the AIBP DA25/0955 TIA as the basis for all analysis. As noted by SCT Consulting, the DA24/0294 TIA was prepared in April 2024 using a roundabout intersection layout and did not use March 2025 data. The DA25/0955 TIA data has accordingly been adopted as the most current and appropriate baseline, incorporating background traffic, Sydney Metro EIS peak construction volumes, and AIBP construction activity.
iii. Updated cumulative traffic modelling, incorporating all existing and proposed traffic (with consideration of BINGO, AIBP and SMSMF operations) for all relevant scenarios.	Updated cumulative traffic modelling has been prepared by SCT Consulting (February 2026) and is provided at Attachment A. The modelling adopts the Arcadis Scenario C framework from the AIBP CTMP and DA25/0955 TIA, which incorporates March 2025 survey data, Sydney Metro EIS peak construction volumes, and AIBP construction traffic using the southern access during peak periods. The construction program has been further updated to reflect the

	revised AIBP program (February 2026), identifying the February to August 2027 period as the critical cumulative traffic peak. Scenario C (adjusted) results are presented for the baseline and with BINGO modification traffic added, for both AM and PM peak periods. The modelling confirms that the modification's incremental impact is minor in the AM peak and, in the PM peak, is fully mitigated by the committed mitigation measure where the modification proposal will not operate during this period.
iv. Confirmation of whether the Applicant has considered staged implementation of increased heavy vehicle movements, noting the current intersection constraints and pending intersection upgrade works.	SRC Operations has considered staged implementation and is of the view that the committed PM peak departure restriction represents the most appropriate and targeted form of operational staging. This restriction effectively limits modification traffic to the periods when the intersection operates within acceptable performance parameters, without imposing an arbitrary volume cap that would undermine the operational viability of the modification and exacerbate the landfill airspace deficit. A volume-based staged approach would not address the specific intersection constraint identified by the updated modelling — which is limited to PM peak exiting movements — and would impose unnecessary operational constraints at all other times of day when the modification's impact on the intersection is demonstrably minor.

2.

i. details of how existing and proposed traffic will be managed during the intersection upgrade works and during Sydney Metro's peak construction timeframes to avoid operational conflicts

SRC Operations commits to updating its Site Traffic Management Plan and Transport Code of Conduct to include specific protocols for managing BINGO traffic during both Sydney Metro's peak construction timeframes and the period of intersection upgrade construction works. Key measures include:

- restricting modification-related departures during the PM network peak period (after 4:30 pm on weekdays) until the intersection upgrade is operational, consistent with the AIBP CTMP peak-period restrictions;
- ongoing liaison with Sydney Metro through existing interface coordination forums, with SRC Operations to participate in relevant interface meetings involving Council and Sydney Metro;
- specific provisions for the OSOM delivery program (currently scheduled May to August 2026), including direct coordination with Sydney Metro to manage any interactions during that period; and
- proactive scheduling of extraction-related heavy vehicle movements outside Sydney Metro peak construction hours where practicable.

These measures will be documented in a revised Transport Code of Conduct and Traffic Management Plan as required.

SRC Operations has undertaken additional consultation with AIBP to identify how traffic will be managed during their intersection upgrade works. AIBP have detailed that they will be staging the intersection upgrade to construct the carriageways offline. This will allow ongoing two-way traffic on Patons Lane during construction.

Any interruptions to two-way traffic flows to enable tie in's etcetera, would be minor, short term and managed through the use of dedicated traffic controllers.

The draft staging plan for the intersection upgrade works showing how the traffic flows on Patons Lane would be maintained, is provided at Attachment B. Note that construction of the proposed intersection upgrade is not yet approved and SRC Operations is not the proponent of that project.

ii. consideration of alternative access routes and/or operational adjustments, noting that AIBP has committed under DA25/0955 to avoid use of Patons Lane during Sydney Metro's peak construction hours with an alternative southern access route to Luddenham Road proposed instead

SRC Operations notes that, unlike the AIBP site, the BINGO site does not have access to an alternative route to Luddenham Road. Patons Lane is the sole access to the site and there is no feasible alternative.

However, in accordance with the existing conditions of MP09_0074 BINGO vehicles do not turn right at the Patons Lane/Luddenham Road and instead travel north from the site to Mamre Road. As a result, they do not contribute to the right-turn movement out of

	Patons Lane that is the primary driver of PM peak congestion. The committed PM peak departure restriction achieves the equivalent operational outcome to AIBP's alternative access commitment — removing BINGO modification traffic from the network during the critical peak period — without requiring a physical access alternative that does not exist.
iii. outcomes of consultation with Sydney Metro's construction delivery team and any resulting revisions to proposed traffic management	SRC Operations held a meeting with Sydney Metro and its traffic and planning advisors on 16 December 2025. The outcomes of that meeting, including commitments to ongoing coordination, OSOM delivery scheduling, and updates to the Transport Code of Conduct to address the planned Active Transport Corridor crossing, are detailed in Section 3.3.2 of the RTS Report (Element Environment, 16 January 2026). SRC Operations notes that Sydney Metro's post-RTS submission reserved the right to provide further advice pending feedback from its construction delivery team. To date not further feedback has been received.

3.

The Submissions Report indicates consultation with AIBP but not with Council, despite Council being a joint party to the Voluntary Planning Agreement for the proposed Luddenham Road / Patons Lane intersection upgrades and also being the Road Authority for Patons Lane. Evidence of consultation with Council should be provided regarding the modification, including any outcomes relating	Council has been engaged throughout the modification process. Consultation occurred through the Community Liaison Committee (CLC) meeting held on 6 November 2025, at which Council representatives were present and noted the material upgrades to the off-site road network since the original approval. Council also lodged a formal submission on the modification, which was received and
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to traffic management during the proposed intersection upgrade works and potential changes to BINGO site operations (e.g. haulage scheduling, alternative access routes and traffic control measures).

responded to in detail in the RTS Report (Section 4.1.4, Element Environment, 16 January 2026).

It is noted that the Department's submission on the modification (DPHI, 13 November 2025) explicitly acknowledged that consultation with Penrith City Council had occurred, stating: "The modification report notes consultation with the Environment Protection Authority, Transport for NSW and Penrith City Council (Council)." In that submission, the Department requested further consultation with Sydney Metro, the AIBP, and nearby residents — but did not identify Council as a stakeholder requiring further engagement. The current request to provide additional evidence of Council consultation therefore represents a departure from the Department's earlier position, which had accepted that Council consultation had taken place.

Regardless, SRC Operations has undertaken additional consultation with Council on 9 March 2026 to discuss responses to their additional comments and present the outcomes of the updated traffic modelling in line with the responses contained within this document.

Penrith City Council

Comment	Response
1. Planning Considerations	
The response to submissions mentions that DA25/0955 being the Development Application for the Patons Lane and Luddenham Road intersection and Patons Lane upgrades including round-about Collector Road intersection works is approved with construction scheduled to start in quarter 1 2027. It shall be acknowledged and considered that DA25/0955 is yet to be determined and is still under assessment. Should the Modification Application be approved it is requested that conditions of consent are imposed to ensure mud and soil deposits are not left on the surrounding road network.	The reference to DA25/0955 being "approved" in the RTS Report was a typographical error. SRC Operations acknowledges that DA25/0955 has been lodged with Penrith City Council and is currently under assessment. It has not yet been determined. SRC Operations does not rely on the intersection upgrade being in place to demonstrate the acceptability of the modification. It is important to note that all parties including SRC Operations, Sydney Metro and the Alsip Industrial Business Park (AIBP) proponent agree that once the proposed intersection upgrade is complete, there are no capacity constraints for traffic at the Luddenham Road/Patons Lane intersection. Based on current estimates, construction of the intersection upgrade is scheduled to commence in the first quarter of 2027. Any impacts on the performance of the intersection arising from the various projects that utilise Patons Lane are therefore temporary and short-term in nature and will be resolved upon delivery of the signalised upgrade. Regardless, updated traffic modelling has been undertaken specifically to assess peak construction period performance at the intersection, with the results presented in the SCT Consulting

Updated Modelling (February 2026) included at Attachment A and discussed further below.

It should be noted that the consent already includes conditions of consent to manage tracking, specifically Condition 19 “The Proponent shall not track mud or waste from vehicles on public roads”. The site maintains a wheel wash and utilises regular street sweeping in accordance with the sites Environmental Management System to manage soil and water impacts and SRC Operations commits to maintaining these measures.

2. Traffic Considerations

a) The proposed modification will increase the number of heavy vehicle movements from 256 to 570 vehicle movements per day, resulting in 40 additional heavy vehicle movements during peak times and 314 additional daily truck movements at the intersection of Luddenham Road and Patons Lane. The increase in traffic flow will have a significant impact on the performance of the intersection as the existing intersection layout doesn’t have the capacity to accommodate 40 additional peak hour heavy vehicle movements and 314 additional daily truck movements without any upgrades to the intersection.

b) The proposed modification may seek commencement of intensified vehicle movement prior to the Luddenham Road and Patons Lane intersection upgrades (which are yet to be approved – refer to Point 1). The current Luddenham Road and Patons Lane

a) The 40 additional peak-hour vehicle movements associated with the modification represent an increase of less than 5% of total intersection traffic and do not constitute a significant increase in vehicle numbers at the intersection.

The updated modelling (SCT Consulting, February 2026) confirms the following:

- In the AM peak hour, there is a minor increase to average delay (60.5 to 67.8 seconds) with the intersection remaining at LoS E. The queue on the Patons Lane approach increases from 17 m to 24 m — less than one truck length.
- In the PM peak hour, the Patons Lane approach already exceeds capacity (DoS >1.0) under the cumulative baseline

intersection cannot accommodate the additional vehicles noting the substantial impact on the operation of Luddenham Road and Patons Lane intersection, which is not envisioned to be mitigated solely by traffic controllers.

As such, the proposed modification should not be supported.

scenario, driven by right-turning traffic exiting Patons Lane from the Sydney Metro and AIBP construction activities. While the additional BINGO traffic does not contribute any new right-turning movements to the intersection, the addition of left-turning vehicles to an already-saturated approach results in some worsening of modelled conditions.

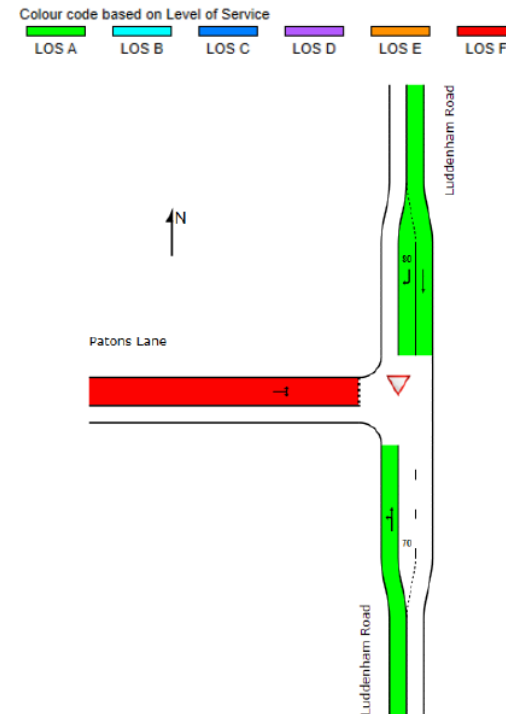
It is important to note that these results are conservative for the following reasons:

- The modelling assumes BINGO's peak movements align with the network AM and PM peaks, however weighbridge data collected over a six-month period (June to November 2024) identifies the BINGO site peak as 11:00 am, which does not coincide with the network peak periods; and
- the modelling assumes simultaneous peak construction traffic volumes from both Sydney Metro (based on EIS figures) and multiple stages of the AIBP construction program, a worst-case combination that is unlikely to occur in practice.

It is also critical to note that Patons Lane is the only access to the BINGO site and the Sydney Metro stabling yard, and one of two accesses to the AIBP. There is effectively no general public use of Patons Lane.

Whilst the right-turn exit from Patons Lane experiences congestion during peak periods, all other legs of the intersection — including through movements on Luddenham Road and turning movements

into Patons Lane — continue to operate at LoS A under all modelled scenarios. Members of the public travelling on Luddenham Road are unaffected by the congestion on the Patons Lane exit approach. Similarly, delivery vehicles and other traffic entering Patons Lane would not experience delays, as the relevant intersection legs remain at LoS A in all scenarios as shown below (and in Attachment A).



b) Potential impacts from the modification are limited to the PM peak period and to exiting movements from Patons Lane. To address this, SRC Operations commits to a condition of consent restricting all extraction-related truck departures (i.e. additional modification movements and existing approved extraction numbers) from departing the site during the PM network peak period (after 4:30 pm

on weekdays), until such time as the Luddenham Road/Patons Lane intersection is upgraded to signalised operation.

With this restriction in place, the modification would have no impact on intersection performance during the PM peak period, and traffic controllers would not be required to manage any impacts attributable to the modification.

As the modification's impacts on the intersection are negligible outside the PM peak period, and the PM peak impact is fully addressed by the committed departure restriction, there are no grounds for deferral or refusal of the modification. The intersection is proposed to be upgraded to signalised operation (subject to determination of DA25/0955), at which point all parties agree there are no remaining capacity constraints, and the departure restriction would no longer be required.

Importantly the revised traffic assessment provided at Attachment A demonstrates that the cumulative traffic from the proposed modification, AIBP and SMSMF can be safely accommodated prior to the proposed Patons Lane / Luddenham Road intersection upgrade with the Modification Proposal having no impact on the intersection during the PM network peak period when accounting for mitigation.

SRC Operations has undertaken additional consultation with AIBP to identify how traffic will be managed during their intersection upgrade works. AIBP have detailed that they will be staging the intersection

upgrade to construct the carriageways offline. This will allow ongoing two-way traffic on Patons Lane during construction.

Any interruptions to two-way traffic flows to enable tie in's etcetera, would be minor, short term and managed through the use of dedicated traffic controllers.

The draft staging plan for the intersection upgrade works showing how the traffic flows on Patons Lane would be maintained, is provided at Attachment B. Note that construction of the proposed intersection upgrade is not yet approved and SRC Operations is not the proponent of that project.

Note that the peak construction periods for both the AIBP and Sydney Metro facilities have passed and in reality, the number of vehicles utilising the Patons Lane / Luddenham Road intersection is likely to be less than has been modelled. Any delays to the delivery of the intersection upgrade would likely result in further reducing vehicle numbers during construction as the Sydney Metro project transitions from construction to operations.

3. Environmental considerations

a) Comments have been provided previously in relation to land contamination, wastewater management and general environmental management which are to be considered by the Department.

a) Noted. Detailed responses to these comments have been provided as part of the Response to Submissions dated 16 January 2026.

b) It is noted that DPHI will undertake a comprehensive review of the Submission Report, including appended technical reports, assessing environmental health impacts which were raised previously.

c) Upon DPHI being satisfied with the application, Council anticipates that any mitigation and monitoring measures contained in the EIS, as put forward in the technical documents (and as refined or modified to satisfy DPHI during the assessment process), will be incorporated into any approval issued by DPHI, ensuring potential environmental impacts can be effectively managed and monitored.

d) It should again be noted that Council requests that conditions of consent do not require further assessment by Council of any item, except where there is a legislative requirement (such as the need for a s68 application under the Local Government Act 1993), or where specifically requested by Council.

b) Noted.

c) Noted.

d) Noted. SRC Operations acknowledges Council's position and will work with DPHI to ensure that any conditions of consent are appropriately scoped and do not impose assessment obligations on Council beyond those required by legislation or specifically requested by Council.

Sydney Metro

Comment	Response
1. Submission Report (dated 16 January 2026)	
Section 4.1.8 (page 35) stated that <i>‘The Luddenham Road / Patons Lane intersection is approved to be upgraded to a signalised intersection (DA25/0955).’</i> This statement is incorrect. Development Application DA25/0955, which relates to the proposed upgrade of the existing Luddenham Road and Patons Lane intersection and the Patons Lane road upgrade, is currently under assessment by Penrith City Council and has not yet been determined. Section 4.1.8 (page 34) states that <i>“The Alsip construction impacts have not been qualitatively considered as they are temporary and short-term.”</i> This position is not supported by Sydney Metro. Prior to the upgrade of the Patons Lane / Luddenham Road intersection to a signalised intersection, the AIBP development is expected to generate a substantial volume of construction traffic to and from Patons Lane over an extended period. These impacts cannot be reasonably characterised as negligible or short-term. Accordingly, construction traffic impacts associated with both AIBP and the SMWSA on Patons Lane and Luddenham Road must be comprehensively assessed and addressed. Alternatively, should the Department be of the view to support this modification, the Department should require that commencement of MOD3 be	The reference in the RTS Report to DA25/0955 being "approved" was a typographical error. SRC Operations understand DA25/0955 has been lodged with Penrith City Council and is currently under assessment and it has not been determined. All supporting traffic analysis has been prepared and updated on the basis that the intersection upgrade is not yet approved or constructed. In direct response to Sydney Metro's request that cumulative construction traffic from the AIBP and the SMF be comprehensively assessed, updated traffic modelling has been prepared by SCT Consulting (February 2026, provided at Attachment A). The updated modelling adopts the Arcadis Scenario C framework from the AIBP CTMP and DA25/0955 TIA, which uses March 2025 survey data and includes Sydney Metro EIS peak construction volumes and AIBP construction traffic using the southern access during peak periods. The modelling has been further adjusted to reflect the revised AIBP construction program (February 2026), identifying the February to August 2027 period as the critical cumulative traffic peak — the period during which the modification's additional traffic would be active alongside AIBP construction activity. The updated modelling confirms that through traffic on Luddenham Road and turning movements into Patons Lane continue to operate at LoS A in all

deferred until the Patons Lane / Luddenham Road signalised intersection is operational to ensure the construction impacts are adequately addressed.

Section 4.1.1 Traffic (page 22 and 23) indicated that *'SRC Operations confirms that the Patons Lane modification is not necessarily reliant on the completion of the Luddenham Road / Patons Lane intersection upgrade' and 'The intersection upgrade design and traffic modelling data indicates that the additional truck movements associated with the modification can be accommodated and no interim measures would be required should delivery of the intersection upgrade be delayed.'* As mentioned above, between now and until the current Patons Lane/ Luddenham Road intersection is upgraded to a traffic signal, it is expected that AIBP will generate significant amount of construction vehicles to/ from Patons Lane. Therefore the Applicant must consider construction impact due to the AIBP and SMWSA on Patons Lane and Luddenham Road unless the commencement of the MOD3 will be deferred until the operation of Patons Lane/ Luddenham Road traffic signal.

scenarios. The congestion concern is isolated to exiting movements from Patons Lane, driven by the cumulative construction scenario irrespective of BINGO traffic with BINGO modification traffic contributing less than 5% of total peak-hour intersection volumes under the conservative cumulative scenario. On this basis Sydney Metro's access along Patons Lane, in particular for deliveries, would not be adversely impacted.

SRC Operations does not consider that deferral of the modification until the intersection upgrade is operational is a proportionate or necessary outcome. The modification is assessed on its own merits and its contribution to network performance is demonstrably minor. A deferral condition would effectively make the approval contingent on a third party's DA determination and construction timeline, which is not appropriate.

Without the increased extraction rate, the PLRRCL faces intermittent closure as early as mid-2027, with significant consequences for C&D waste disposal capacity across Greater Sydney.

Notwithstanding the above, SRC Operations recognises the congestion concern during the PM peak hour and commits to a condition of consent restricting all extraction-related truck departures (i.e. additional modification movements and existing approved extraction numbers) from departing the site during the PM network peak period (after 4:30 pm on weekdays), until such time as the Luddenham Road/Patons Lane intersection is upgraded to signalised operation.

2. Appendix B – Updated Traffic Impact Assessment

Tables 2-1 and 2-1 relies on traffic survey data from 13 November 2024. Sydney Metro has previously suggested the Applicant to utilise the traffic data (i.e. March 2025) that was provided as part of the Traffic Impact Assessment and Construction Traffic Management Plan for the Alspeck 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.

Table 4-6 (i.e. intersection assessment from AIBP) indicated that Luddenham Road / Patons Lane intersection already operates at LoS D (AM peak) and F (AM peak) under the 2025 Base Case. Hence, as part of the CTMP condition AIBP construction vehicles are restricted from using Patons Lane during Sydney Metro peak construction hours, which are between 7.30 AM and 8.30 AM, and 4.30 PM and 5.30 PM weekdays. During off peak hours, AIBP construction vehicles will utilise a one-way southbound flow arrangement through the construction site, where ingress would be via Patons Lane, and egress would be via the newly proposed AIBP's southern intersection on Luddenham Road.

The updated modelling (February 2026) has adopted the March 2025 survey data as the basis for all traffic analysis, consistent with Sydney Metro's request. The traffic models used in the AIBP DA25/0955 TIA (which used the March 2025 survey data and included Sydney Metro construction traffic) have been adopted as the baseline for the updated cumulative assessment. As noted by SCT Consulting, the DA24/0294 TIA was prepared in April 2024 using a roundabout layout and did not use March 2025 data; accordingly, the DA25/0955 TIA data has been adopted as the most current and appropriate basis.

The updated modelling adopts Scenario C from the AIBP CTMP assessments, which models AIBP construction vehicles using the southern access during peak periods. Even under this scenario, AIBP construction vehicles continue to contribute through-movements on Luddenham Road, and the intersection operates at LoS E (AM) and LoS F (PM) under the cumulative baseline, consistent with the results identified by Sydney Metro and Arcadis. The BINGO modification's incremental contribution in the AM peak is minor. For the PM peak, the committed restriction on modification-related departures (after 4:30 pm on weekdays) is aligned with the same peak restriction period applied to AIBP construction vehicles, ensuring BINGO does not add to peak network stress.

SRC Operations does not consider deferral of the Modification to be a proportionate outcome. The modification's contribution to peak

Please note the Voluntary Planning Agreement executed as part of the AIBP planning proposal development states that 'prior to the issue of any Occupation Certificate for the Development, the required works are construction of one new roundabout at the estate entry on Patons Lane and one new intersection on Luddenham Road to the satisfaction of Council and Transport for NSW.' Operation of AIBP development is dependent on completion of these roadworks and intersection upgrades on Patons Lane.

Furthermore, please note DA25/0955 seeks the following road works:

- Construction of a new primary signalised intersection at Luddenham Road and Patons Lane
- Roadworks required to tie the new pavement in with the existing Luddenham Road and proposed design of proposed development site
- New line marking for proposed intersection
- Construction of a new roundabout intersection, from Patons Lane into the proposed development site, to tie into the existing Patons Lane and the new AIBP estate road.

Notwithstanding that DA25/0955 is yet to be approved by Penrith City Council, the construction impact on Patons Lane and Luddenham Road is expected to be significant during the construction phase of the road works. At this stage, it is not clear whether two-way vehicle

traffic is minor and its impact on Sydney Metro's access along Patons Lane is demonstrated to not be material. Any disruption to Patons Lane during construction of the intersection upgrade will be managed through traffic management arrangements required under DA25/0955, which are the responsibility of the AIBP proponent.

SRC Operations has undertaken additional consultation with AIBP to identify how traffic will be managed during their intersection upgrade works. AIBP have detailed that they will be staging the intersection upgrade to construct the carriageways offline. This will allow ongoing two-way traffic on Patons Lane during construction.

Any interruptions to two-way traffic flows to enable tie in's etcetera, would be minor, short term and managed through the use of dedicated traffic controllers.

The draft staging plan for the intersection upgrade works showing how the traffic flows on Patons Lane would be maintained, is provided at Attachment B. Note that construction of the proposed intersection upgrade is not yet approved and SRC Operations is not the proponent of that project.

Note that the peak construction periods for both the AIBP and Sydney Metro facilities have passed and in reality, the number of vehicles utilising the Patons Lane / Luddenham Road intersection is likely to be less than has been modelled.

SRC Operations commits to continuing to engage with Sydney Metro and the AIBP developer to coordinate operations during that

movements can be maintained on Patons Lane and/or Luddenham Road during the construction stages.

Based on the above, Sydney Metro conveys significant concerns with the proposed MOD3 to increase the maximum approved daily truck movements from 256 to 570 on Patons Lane, in its current configuration. Sydney Metro recommends DPHI to defer the approval of the MOD3 until the Patons Lane/ Luddenham Road intersection is upgraded to a traffic signal.

construction period. The committed PM peak departure restriction (after 4:30 pm on weekdays) directly addresses the period of highest network stress and is aligned with existing CTMP restrictions.

SRC Operations respectfully submits that the modification should be assessed on its own merits and the updated evidence now before the Department.

Additional submission to DPHI

Sydney Metro is currently awaiting feedback from Sydney Metro's construction project team about possible delays in the delivery of equipment and rolling stock to the Sydney Metro Stabling and Maintenance Facility. An updated submission is to be provided to ensure any additional project related concerns on the timely delivery and construction of the Sydney Metro Western Sydney Airport project are not adversely impacted by the subject development.

SRC Operations remains committed to the collaborative approach established through the December 2025 meeting with Sydney Metro, including ongoing engagement regarding OSOM delivery schedules and critical construction milestones. However, SRC Operations respectfully notes the strategic urgency of this modification in the context of the Greater Sydney landfill crisis.

The modification application was publicly exhibited from 14 to 27 October 2025 — more than four months ago. The RTS Report was submitted to DPHI on 16 January 2026, and updated traffic modelling further addressing Sydney Metro's specific concerns has now been provided. As demonstrated comprehensively through that updated modelling, the BINGO modification contributes less than 5% of total peak-hour intersection traffic under the most conservative cumulative construction scenario. Through traffic on Luddenham Road — including Sydney Metro's primary access route — continues to

operate at LoS A in all modelled scenarios, and there is no material impact on road network performance attributable to the modification.

The residual PM peak concern has been directly addressed through SRC Operations' commitment to restrict modification-related departures during the PM network peak period (after 4:30 pm on weekdays) until the intersection is upgraded to signalised operation.

The PLRRCL faces intermittent closure as early as mid-2027 if the increased extraction rate is not approved, with significant consequences for C&D waste disposal capacity across Greater Sydney. In that context, SRC Operations considers that Sydney Metro has had more than adequate time and opportunity to provide any concerns it wishes to raise, and that an open-ended reservation to provide a further submission should not delay determination of this application. SRC Operations respectfully requests that DPHI proceed to determine the modification.

Proposed mitigation

During consultation with DPHI, it was identified that any condition of consent for the proposed departure restriction would need to be carefully worded to ensure that it was clear, enforceable and reasonable. To ensure the proposed mitigation is enforceable and achieves the intended outcome, SRC Operations propose a new condition of consent is included within the approval as follows:

[Condition XX] – PM Peak Restriction on Extraction Vehicle Departures

(a) No heavy vehicle carrying extracted clay or shale material shall depart the site after 4:30 pm on any weekday.

(b) For the purposes of demonstrating compliance with this condition, the Proponent shall use the weighbridge records maintained at the site to identify all extraction-related heavy vehicle departures.

(c) The Proponent shall include a summary of weighbridge records relating to extraction vehicle departures during the PM peak period in each Annual Environmental Management Report submitted under Schedule 5, and shall make daily weighbridge records available to the Secretary upon request.

(d) This condition ceases to apply upon the completion and opening to traffic of the signalised intersection upgrade at the junction of Patons Lane and Luddenham Road, as approved under DA25/0955. The Proponent shall notify the Secretary in writing within 14 days of that intersection becoming operational, and the Secretary shall confirm in writing when this condition is no longer operative.

Conclusion

SRC Operations submits that the above responses, together with the RTS Report (Element Environment, 16 January 2026) and the updated traffic modelling (SCT Consulting, February 2026) at Attachment A, constitute a comprehensive and complete body of evidence addressing all matters raised by DPHI, Penrith City Council and Sydney Metro.

These are the final responses to submissions for Modification 3 (MP09_0074-Mod-3). The key outstanding traffic concern — intersection performance during the PM network peak period — has been directly addressed through SRC Operations' commitment to restrict extraction related departures (including those under the current approved vehicle limit) after 4:30 pm on weekdays until the Luddenham Road/Patons Lane intersection is upgraded to signalised operation. Across all other modelled scenarios and time periods, the modification's contribution to intersection traffic is minor and its impacts on network performance are negligible.

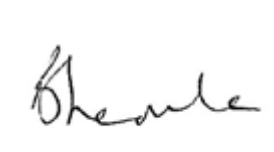
SRC Operations respectfully submits that DPHI now has sufficient information to determine this application and that the evidence before the Department does not warrant any further rounds of consultation.

The PLRRCL is one of the few remaining inert landfills serving Greater Sydney and, without the increased extraction rate approved under this modification, the site faces intermittent closure as early as mid-2027 due to insufficient airspace creation triggered by extraction constraints in the current Project Approval. Any further delay to determination risks jeopardising the site's ability to continue providing critical waste disposal infrastructure for the region's construction sector, with significant flow-on consequences for housing delivery and the broader NSW economy.

SRC Operations would welcome the opportunity to discuss any outstanding matters with the Department at its earliest convenience and looks forward to a timely resolution of this application.

Please do not hesitate to give me a call if you require any further clarification.

Yours sincerely,



Brad Searle
Executive General Manager - Development
BINGO Industries

Attachment A - Updated Traffic Modelling Results

Patons Lane Landfill and Resource Recovery Centre

Updated modelling

26.02.2026 | v1.0



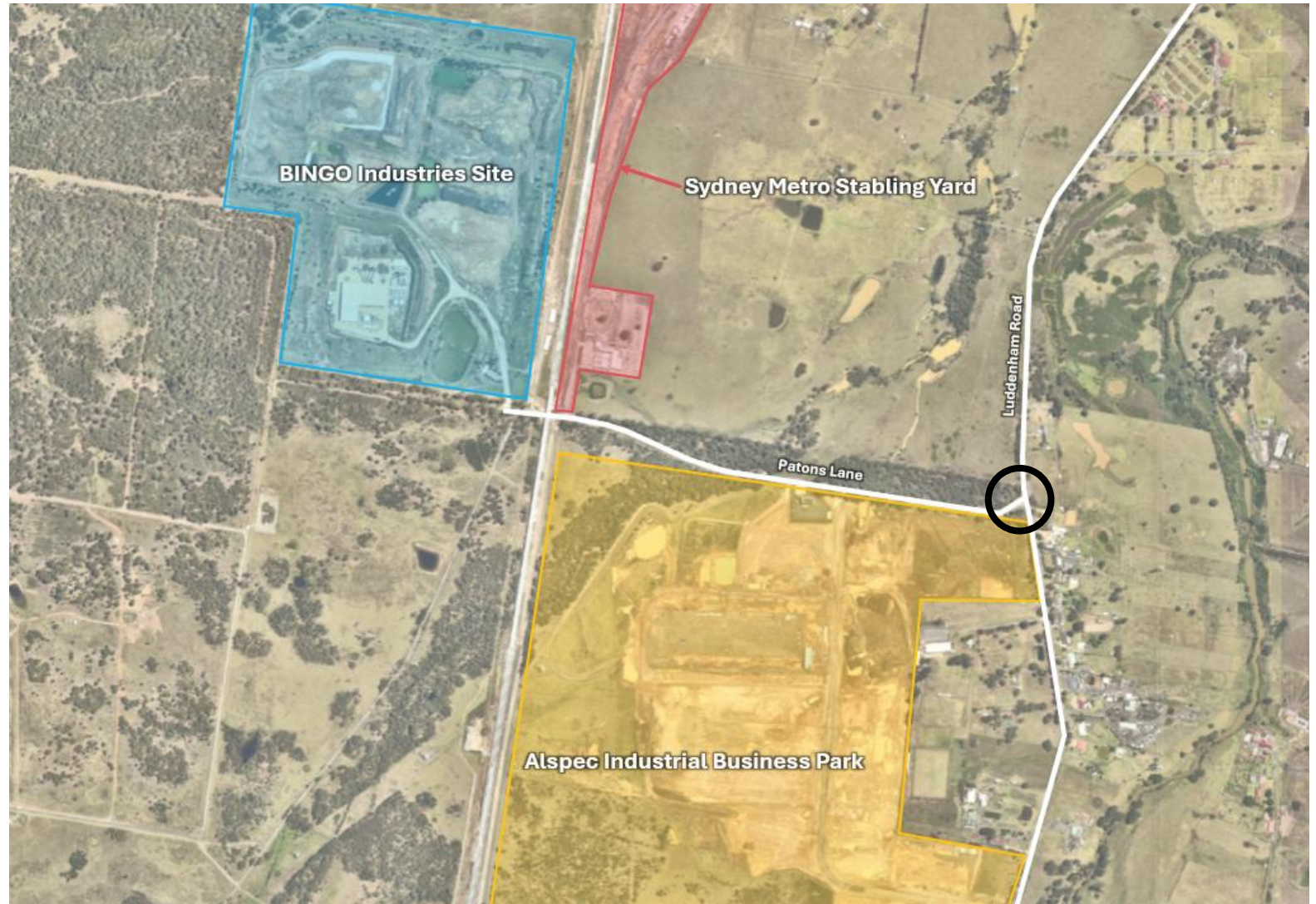
Agenda

- 01 Background, Metro / Council comments and updated modelling approach
 - 02 Alspec Industrial Business Park traffic assessments
 - 03 With BINGO modification traffic
 - 04 Options to progress
- 

Background

Background

- BINGO Industries (BINGO) is seeking approval to increase approved truck movements at the Patons Lane Resource Recovery Centre from 256 to 570 daily heavy vehicle movements (no change to site layout, access or operating hours).
- Key constraint in the local road network is the unsignalised Luddenham Road | Patons Lane intersection.
- This intersection is the only access to the BINGO site, Sydney Metro stabling yard and some of the Alspec Industrial Business Park. No other public use.
- The Alspec Industrial Business Park (AIBP) construction generates temporary construction traffic using Patons Lane, overlapping with Sydney Metro stabling yard construction
- Planned network upgrade: An upgrade of the Luddenham Road | Patons Lane intersection (signals and additional capacity) and associated road works have been lodged by AIBP but is not yet approved.
- Once upgraded to signals with additional capacity, all parties agree that there are no capacity constraints for traffic.



Sydney Metro comments

Table 1: Sydney Metro comments

Sydney Metro comments (summarised)	Response
Construction traffic from AIBP and SMWSA must be considered, with modelling for the BINGO modification based on the March 2025 survey data used in the AIBP TIA and CTMP (DA24/0294).	The DA24/0294 TIA was prepared in April 2024 and did not use the March 2025 survey data, instead relying on previous modelling with a roundabout layout. The Earthworks CTMP and DA25/0955 TIA used the March 2025 survey data and consistent Sydney Metro traffic. Accordingly, the DA25/0955 traffic data has been adopted as the most appropriate basis to undertake updated modelling to assess the BINGO modification, prior to signalisation of the Luddenham Road Patons Lane intersection.
The AIBP Voluntary Planning Agreement requires delivery of intersection upgrades prior to occupation, making AIBP development operation contingent on road improvements.	Noted.
The Luddenham Road Patons Lane intersection currently operates at LoS D in the AM peak and LoS F in the PM peak under the 2025 Base Case, with AIBP construction vehicles restricted during Metro peak construction periods.	Modelling presented by Arcadis for the AIBP Earthworks CTMP and Northern Signalisation TIA shows that AIBP construction vehicles will still use the intersection (as through movements on Luddenham Road) when using the alternative access to the AIBP site, so the intersection operates at LoS E in the AM peak and LoS F in the PM peak in the modelled construction periods. See Slide 10 for further details.

Penrith City Council comments

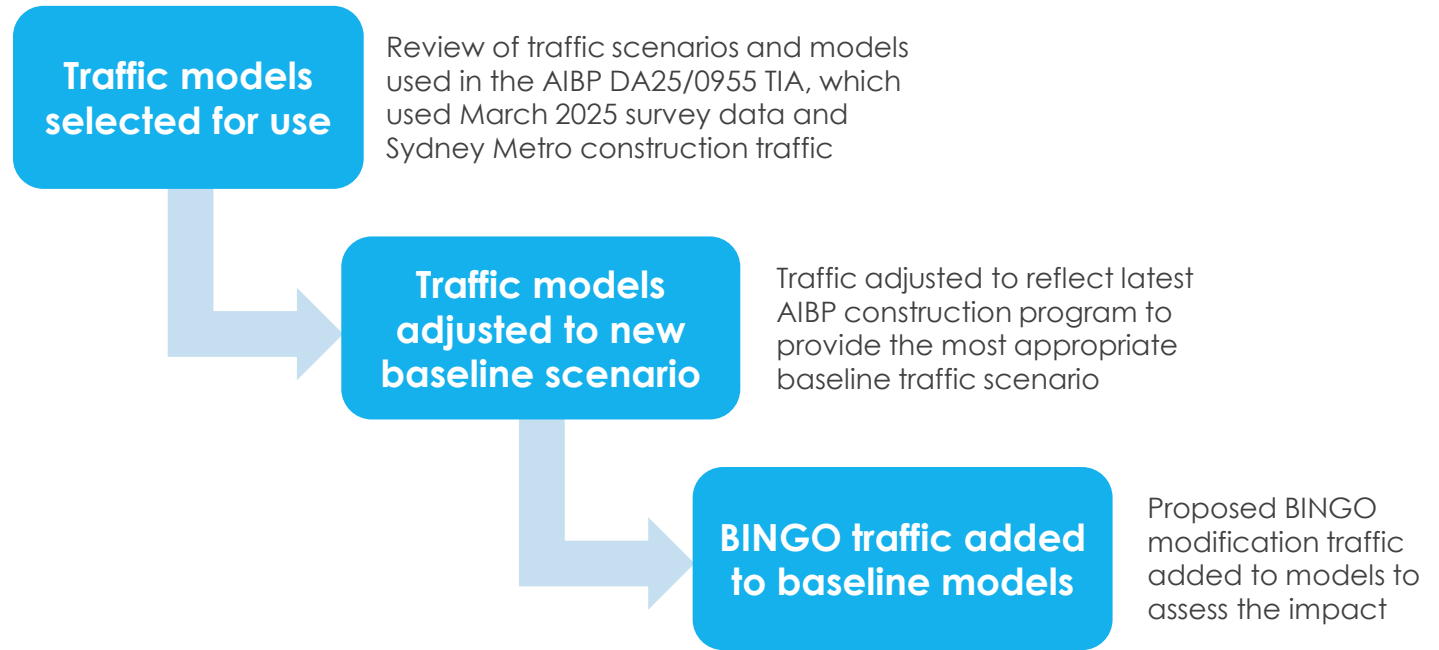
Table 2: Council comments

Penrith City Council comment (summarised)	Response
The increase in traffic flow will have a significant impact on the performance of the intersection as the existing intersection layout doesn't have the capacity to accommodate 40 additional peak hour heavy vehicle movements.	Intersection performance and capacity addressed in Slides 9-14 and 16-17.
The current Luddenham Road and Patons Lane intersection cannot accommodate the additional vehicles noting the substantial impact on the operation of Luddenham Road and Patons Lane intersection, which is not envisioned to be mitigated solely by traffic controllers.	Noted that this is prior to the intersection upgrade. Intersection performance and capacity addressed in Slides 9-14 and 16-17.

Overview of updated modelling approach

- A review of the Alspec Industrial Business Park (AIBP) traffic assessments was undertaken to establish the traffic scenario to test the impact of the BINGO modification traffic against.
- The Luddenham Road | Patons Lane intersection models used in the AIBP traffic assessments were used in this updated modelling for consistency.
- The latest AIBP construction program information was used to adjust the traffic at the intersection to provide the most appropriate baseline traffic scenario.
- Proposed BINGO modification traffic was then added to the models to assess the impact.

Figure 1: Overview of updated modelling approach



02

Alspec Industrial Business Park (AIBP) traffic assessments

Traffic modelling performance metric definitions

- Level of Service (LoS) is a typical measure used by traffic engineers.
- LoS is defined in Transport Modelling Guidelines (Transport for NSW, 2025) and provided in **Table 3**.
- There is a difference between LoS determination between signalised and non-signalised.
 - For traffic signals, the average movement delay and level of service is taken over all movements.
 - For roundabouts and priority control intersections (with stop and give way signs or operating under the T-junction rule), the critical movement for LoS assessment is the movement with the worst delay.

Table 3: Level of service definitions

Level of Service	Average delay (d) per vehicle in seconds	Performance explanation
A	$d \leq 14.5$	Good operation
B	$14.5 < d \leq 28.5$	Good with acceptable delays and spare capacity
C	$28.5 < d \leq 42.5$	Satisfactory
D	$42.5 < d \leq 56.5$	Operating near capacity
E	$56.5 < d \leq 70.5$	At capacity; at signals, incidents will cause excessive delays. Roundabouts require other control method.
F	$d > 70.5$	Unsatisfactory with excessive queuing, requires other control method.

- As acknowledged in the *Guide to Transport Impact Assessments* (Transport for NSW, 2024), a comparison of the existing and future delay provides a better appreciation of the impact of a proposal, and not simply the change in the LoS.
- In addition, the Degree of Saturation (DoS) is included to complement the LoS measure. The DoS is a measure of the volume/capacity for the worst turning movement at the intersection. A DoS of 1.0 implies the turning movement is at capacity.

Alspec Industrial Business Park traffic assessment

- Traffic surveys done in March 2025, which included some Metro traffic.
- The following modelled scenarios were included in the Arcadis traffic reports – AIBP CTPMP (July 2025) and AIBP TIA for Northern Intersection upgrade (Nov 2025):
 - Base case
 - Scenario A – Base case + Sydney Metro EIS peak.
 - Scenario B – Base case + Sydney Metro EIS peak + AIBP construction traffic.
 - Scenario C – Base case + Sydney Metro EIS peak + AIBP construction traffic using southern access at peak times.**

Table 4: Alspec Industrial Business Park modelling results

Scenario	Peak hour	Volume	Max queue (m)	Average delay (sec)	DoS (v/c)	LoS
Base case	AM	984	10	42.9	0.353	D
	PM	1,137	64	84.9	0.888	F
Scenario A	AM	1,048	16	52.0	0.394	D
	PM	1,151	90	100.8	0.947	F
Scenario B	AM	1,175	18	67.9	0.464	E
	PM	1,234	372	297.1	1.244	F
Scenario C	AM	1,138	18	65.8	0.453	E
	PM	1,211	183	193.5	1.106	F

Key outcome:

- Scenario C is the most appropriate traffic scenario to take forward, and the PM peak hour is much more congested than AM peak hour, therefore most critical.

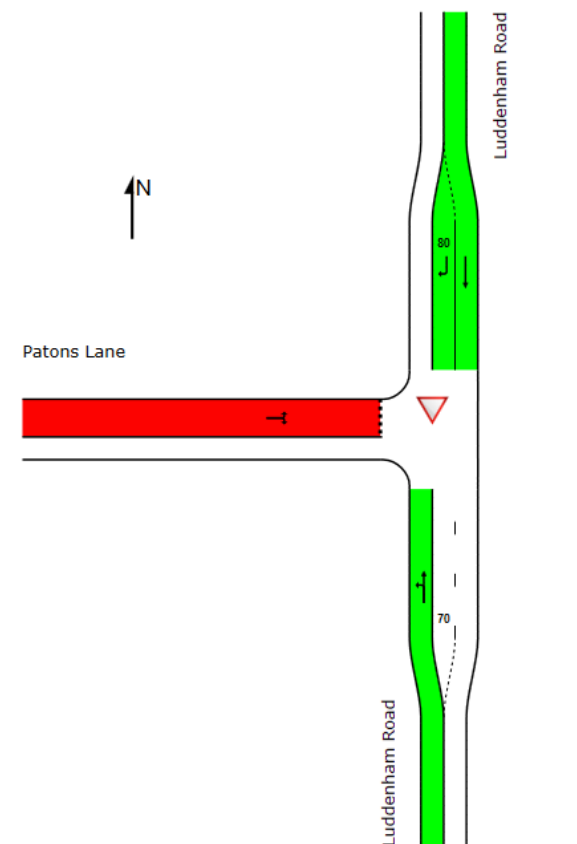
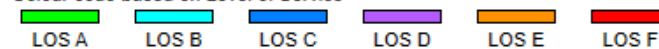
Alspec Industrial Business Park traffic assessment

- Note that for a priority-controlled intersection, the LoS is reported for the worst performing movement.
- Delays are restricted to Patons Lane exit movements, particularly right turn movements.

Scenario C – PM peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows [Total HV]		Arrival Flows [Total HV]		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue [Veh. Dist]		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Luddenham Road															
1	L2	All MCs	6	50.0	6	50.0	0.232	7.9	LOS A	0.0	0.0	0.00	0.01	0.00	62.6
2	T1	All MCs	422	5.7	422	5.7	0.232	0.1	LOS A	0.0	0.0	0.00	0.01	0.00	79.8
Approach			428	6.4	428	6.4	0.232	0.2	NA	0.0	0.0	0.00	0.01	0.00	79.5
North: Luddenham Road															
8	T1	All MCs	539	4.5	539	4.5	0.286	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	79.8
9	R2	All MCs	15	35.7	15	35.7	0.019	9.7	LOS A	0.1	0.6	0.43	0.68	0.43	51.5
Approach			554	5.3	554	5.3	0.286	0.3	NA	0.1	0.6	0.01	0.02	0.01	79.0
West: Patons Lane															
10	L2	All MCs	165	14.6	165	14.6	1.106	132.5	LOS F	22.0	183.2	1.00	3.20	6.90	15.2
12	R2	All MCs	63	8.3	63	8.3	1.106	193.5	LOS F	22.0	183.2	1.00	3.20	6.90	19.6
Approach			228	12.9	228	12.9	1.106	149.4	LOS F	22.0	183.2	1.00	3.20	6.90	16.5
All Vehicles			1211	7.1	1211	7.1	1.106	28.4	NA	22.0	183.2	0.19	0.62	1.31	51.2

Colour code based on Level of Service



Key outcome:

- Through traffic on Luddenham Road and turning movements into Patons Lane operate at LoS A in all scenarios.

Alspec Industrial Business Park traffic assessment

- The AIBP traffic assessments adopted a peak construction period (April 2026) as the worst-case cumulative scenario based on the indicative construction timelines.
- The proposed Bingo traffic increase would occur after completion of this peak construction period.

Table 4-1 AIBP peak daily construction traffic volumes - 2025/26

Project	Daily peak construction traffic – two-way movements	
	LVs	HVs
Storage and distribution warehouse SSDA*	80	30
Bulk earthworks	160	100
COPE warehouse DA	60	20
Southern intersection upgrade	12	20
Alspec warehouse lot 1 SSDA	80	30
SPEC lot 2 DA	50	16
Northern intersection upgrade*	30	80
Total (cumulative assessment)	362	186

Source: 221 Luddenham Road, Orchard Hills – Alspec Industrial Business Park Traffic Impact Assessment for Northern Intersection, Arcadis (November 2025)

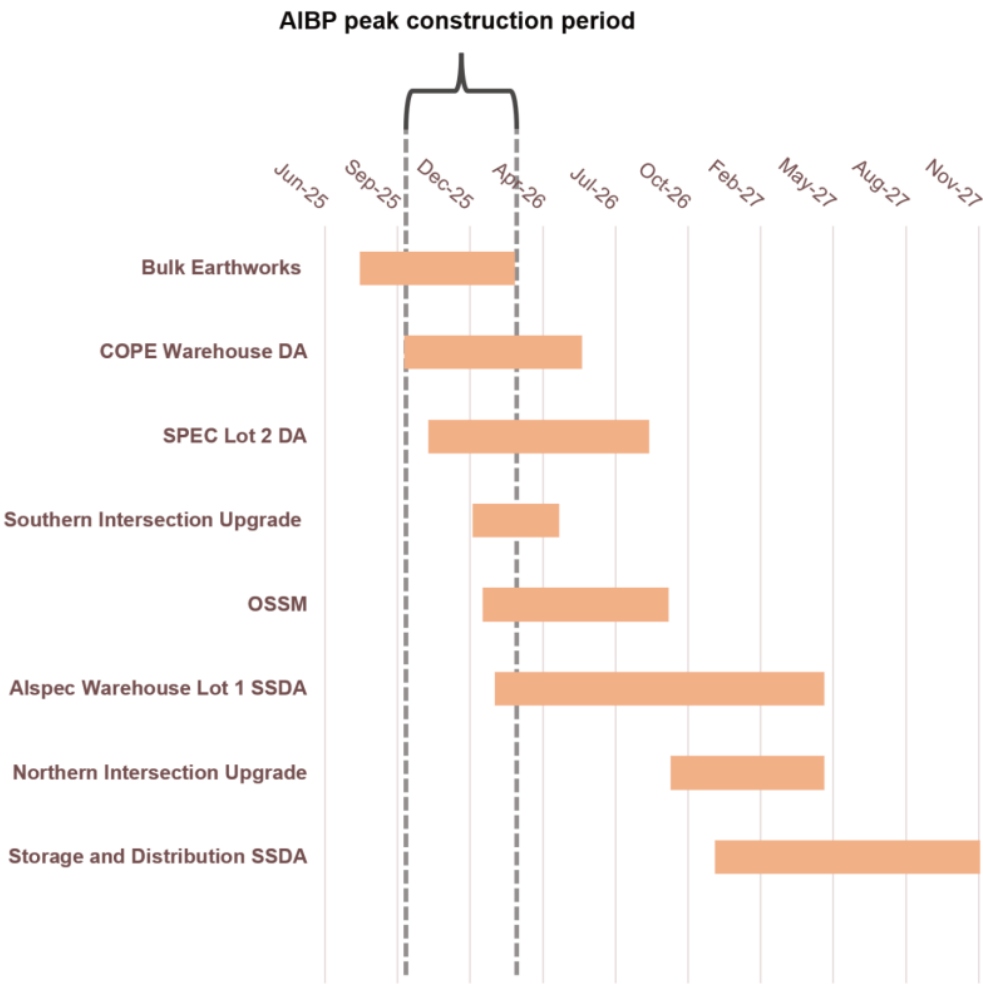
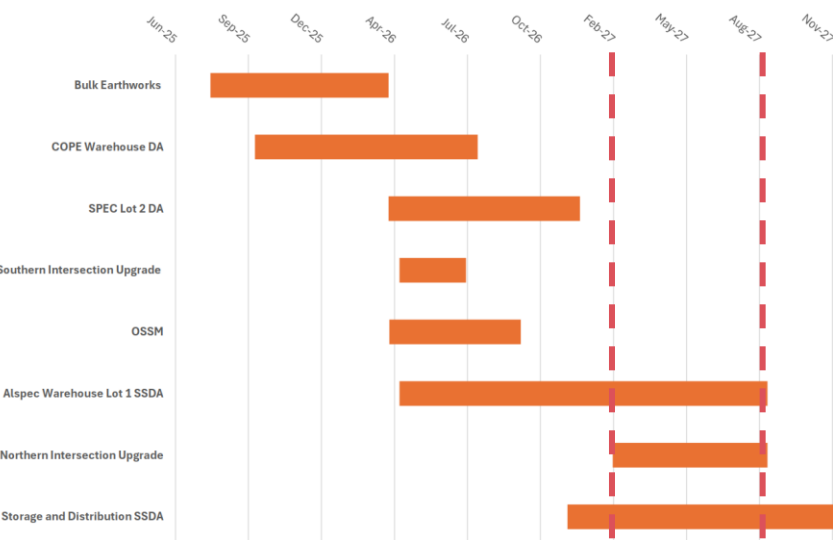


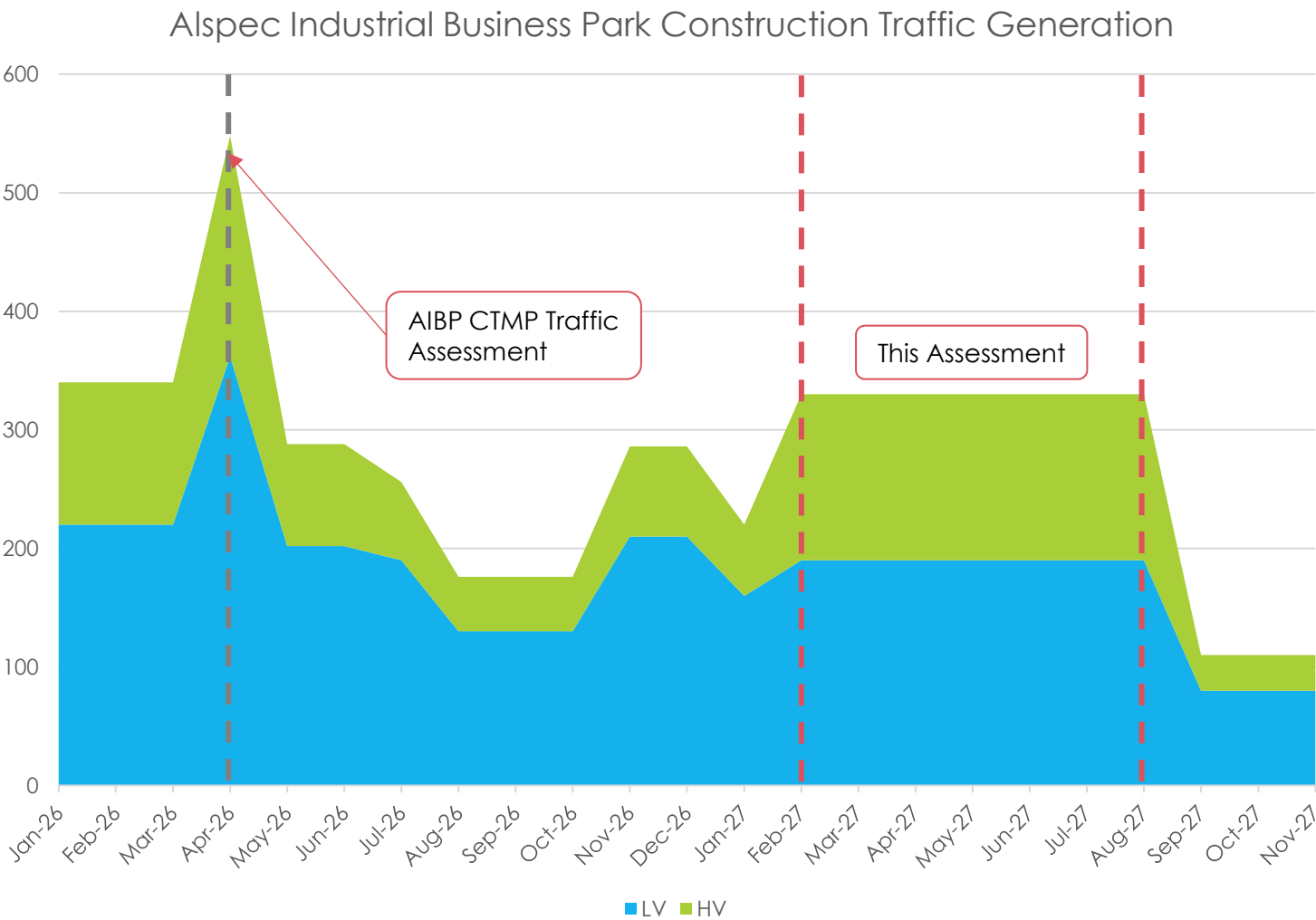
Figure 3-4 Indicative AIBP construction timeline

Alspec Industrial Business Park traffic assessment

- The AIBP construction program has now been revised as shown in the image below.
- The proposed Bingo traffic increase would occur after completion of the initial peak construction period (April 2026), and the modelling therefore assesses the later cumulative traffic peak (Feb-Aug 2027).



Source: AIBP Construction Program (February 2026)



Alspec Industrial Business Park modelling

- Scenario C traffic volumes were adjusted to reflect the Feb-Aug 2027 traffic peak period.
- Results are slightly improved but remain at LoS E and F during the AM and PM peak hours respectively.
- This is the baseline against which to measure the impact of the Bingo modification traffic.
- Again, delays are restricted to Patons Lane exit movements, particularly right turn movements. Through traffic on Luddenham Road and turning movements into Patons Lane operate at LoS A in all scenarios.

Key outcome:

- Scenario C (adjusted) is the appropriate traffic scenario to compare the impact of BINGO modification against, and PM peak hour is the critical time to assess.

Table 5: Alspec Industrial Business Park CTMP adjusted modelling results

Scenario	Peak hour	Volume	Max queue (m)	Average delay (sec)	DoS (v/c)	LoS
Scenario C (previous)	AM	1,138	18	65.8	0.453	E
	PM	1,211	183	193.5	1.106	F
Scenario C (adjusted)	AM	1,105	17	60.5	0.430	E
	PM	1,183	138	144.4	1.037	F

Scenario C (adjusted) – PM peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows [Total HV]		Arrival Flows [Total HV]		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue [Veh. Dist]		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Luddenham Road															
1	L2	All MCs	6	50.0	6	50.0	0.216	7.9	LOS A	0.0	0.0	0.00	0.01	0.00	62.6
2	T1	All MCs	395	5.3	395	5.3	0.216	0.1	LOS A	0.0	0.0	0.00	0.01	0.00	79.8
Approach			401	6.0	401	6.0	0.216	0.2	NA	0.0	0.0	0.00	0.01	0.00	79.5
North: Luddenham Road															
8	T1	All MCs	539	4.5	539	4.5	0.286	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	79.8
9	R2	All MCs	15	35.7	15	35.7	0.019	9.5	LOS A	0.1	0.5	0.42	0.67	0.42	51.7
Approach			554	5.3	554	5.3	0.286	0.3	NA	0.1	0.5	0.01	0.02	0.01	79.0
West: Patons Lane															
10	L2	All MCs	165	14.6	165	14.6	1.037	84.9	LOS F	16.5	137.6	1.00	2.71	5.48	19.8
12	R2	All MCs	63	8.3	63	8.3	1.037	144.4	LOS F	16.5	137.6	1.00	2.71	5.48	25.0
Approach			228	12.9	228	12.9	1.037	101.4	LOS F	16.5	137.6	1.00	2.71	5.48	21.3
All Vehicles			1183	7.0	1183	7.0	1.037	19.8	NA	16.5	137.6	0.20	0.53	1.06	56.6

With BINGO modification traffic

With BINGO modification traffic

- The BINGO modification proposes an additional 314 daily heavy vehicle movements, equivalent to 40 two-way truck movements in the peak hours (20 right in / 20 left out).
- The 40 vehicle movements in the peak hours is conservative, as BINGO peak operations is typically between the network AM and PM peak hours.
- With BINGO traffic added:
 - Through traffic on Luddenham Road and turning movements into Patons Lane operate at LoS A
 - Delays restricted to movements out of Patons Lane.

Table 6: Modelling results comparison

Scenario	Peak hour	Volume	Max queue (m)	Average delay (sec)	DoS (v/c)	LoS
Scenario C (adjusted)	AM	1,105	17	60.5	0.430	E
	PM	1,183	138	144.4	1.037	F
Scenario C (adjusted + BINGO)	AM	1,147	24	67.8	0.527	E
	PM	1,225	241	224.8	1.144	F

Key outcome:

- In the **AM peak hour**, minor increase to delay for Patons Lane exiting traffic – performance remains at LoS E and queue only increases from 17m to 24m (< one truck length).
- In the **PM peak hour**, much larger impact on exiting traffic from Patons Lane due to existing queueing and delays, caused by right turning traffic out of Patons Lane. While BINGO contributes no new right turning traffic to the intersection, results worsen due to Patons Lane approach already exceeding capacity (DoS >1.0). Mitigation required.

With BINGO modification traffic – detailed outputs

- In the **AM peak hour**, small increase to delay for right turning traffic from Patons Lane (61 to 68 seconds) and queueing (17m to 24m) on Patons Lane approach. This less than one truck length and the closest driveway access is 440m from intersection.
- Additional BINGO traffic has minor impact on intersection performance in the AM peak hour.
- In the **PM peak hour**, existing queueing and delays, caused by right turning traffic out of Patons Lane, are worsened.
- BINGO contributes no new right turning traffic to the intersection, but results worsen due to Patons Lane approach already exceeding capacity (DoS > 1.0).

Scenario C (adjusted + BINGO) – AM peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows [Total		Arrival Flows HV]		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue Dist]		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			veh/h	%	veh/h	%				veh	m				
South: Luddenham Road															
1	L2	All MCs	43	34.1	43	34.1	0.366	7.7	LOS A	0.0	0.0	0.00	0.04	0.00	65.4
2	T1	All MCs	620	5.8	620	5.8	0.366	0.1	LOS A	0.0	0.0	0.00	0.04	0.00	79.3
Approach			663	7.6	663	7.6	0.366	0.6	NA	0.0	0.0	0.00	0.04	0.00	78.3
North: Luddenham Road															
8	T1	All MCs	294	18.6	294	18.6	0.177	0.0	LOS A	0.0	0.0	0.00	0.00	0.00	79.9
9	R2	All MCs	120	37.7	120	37.7	0.234	13.1	LOS A	0.8	7.3	0.63	0.88	0.69	48.1
Approach			414	24.2	414	24.2	0.234	3.8	NA	0.8	7.3	0.18	0.26	0.20	70.2
West: Patons Lane															
10	L2	All MCs	49	85.1	49	85.1	0.527	34.9	LOS C	1.9	24.4	0.90	1.12	1.34	25.9
12	R2	All MCs	21	60.0	21	60.0	0.527	67.8	LOS E	1.9	24.4	0.90	1.12	1.34	36.0
Approach			71	77.6	71	77.6	0.527	44.7	LOS D	1.9	24.4	0.90	1.12	1.34	28.9
All Vehicles			1147	17.9	1147	17.9	0.527	4.5	NA	1.9	24.4	0.12	0.19	0.15	69.9

Scenario C (adjusted + BINGO) – PM peak hour

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows [Total		Arrival Flows HV]		Deg. Satn	Aver. Delay	Level of Service	95% Back Of Queue [Veh.		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			veh/h	%	veh/h	%					m				
South: Luddenham Road															
1	L2	All MCs	6	50.0	6	50.0	0.216	7.9	LOS A	0.0	0.0	0.00	0.01	0.00	62.6
2	T1	All MCs	395	5.3	395	5.3	0.216	0.1	LOS A	0.0	0.0	0.00	0.01	0.00	79.8
Approach			401	6.0	401	6.0	0.216	0.2	NA	0.0	0.0	0.00	0.01	0.00	79.5
North: Luddenham Road															
8	T1	All MCs	539	4.5	539	4.5	0.286	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	79.8
9	R2	All MCs	36	73.5	36	73.5	0.056	10.2	LOS A	0.2	2.1	0.46	0.72	0.46	47.9
Approach			575	8.8	575	8.8	0.286	0.7	NA	0.2	2.1	0.03	0.04	0.03	77.7
West: Patons Lane															
10	L2	All MCs	186	24.3	186	24.3	1.144	161.2	LOS F	27.7	241.3	1.00	3.58	7.80	13.3
12	R2	All MCs	63	8.3	63	8.3	1.144	224.8	LOS F	27.7	241.3	1.00	3.58	7.80	17.6
Approach			249	20.3	249	20.3	1.144	177.3	LOS F	27.7	241.3	1.00	3.58	7.80	14.4
All Vehicles			1225	10.2	1225	10.2	1.144	36.5	NA	27.7	241.3	0.22	0.75	1.60	46.3

Options to progress

Options to progress

Option 1 – Do nothing (modification is not approved)

- ✓ No change to approved intersection performance (LoS E–F) during peak construction period.
- ✗ Landfilling outpaces available airspace, forcing a site closure as early as mid-2027.
- ✗ Premature closure of one of Greater Sydney's remaining inert landfills, constraining C&D capacity and increasing construction and housing costs.

Option 2 – Approve modification without conditions

- ✓ Supports continued landfill operation and regional waste capacity.
- ✓ Through and turning movements on Luddenham Road continue to operate at LoS A (no impact to public vehicles).
- ✓ Minor increase to delays and queue on Patons Lane in the AM peak hour.
- ✗ Longer delays and queues on Patons Lane during the PM peak hour for vehicles exiting Patons Lane (from 2.5 minutes to 4 minutes).

Option 3 – Approve modification with condition of restricting BINGO mod traffic during PM peak hour (4.30-5.30pm) until intersection is upgraded to signalised operations

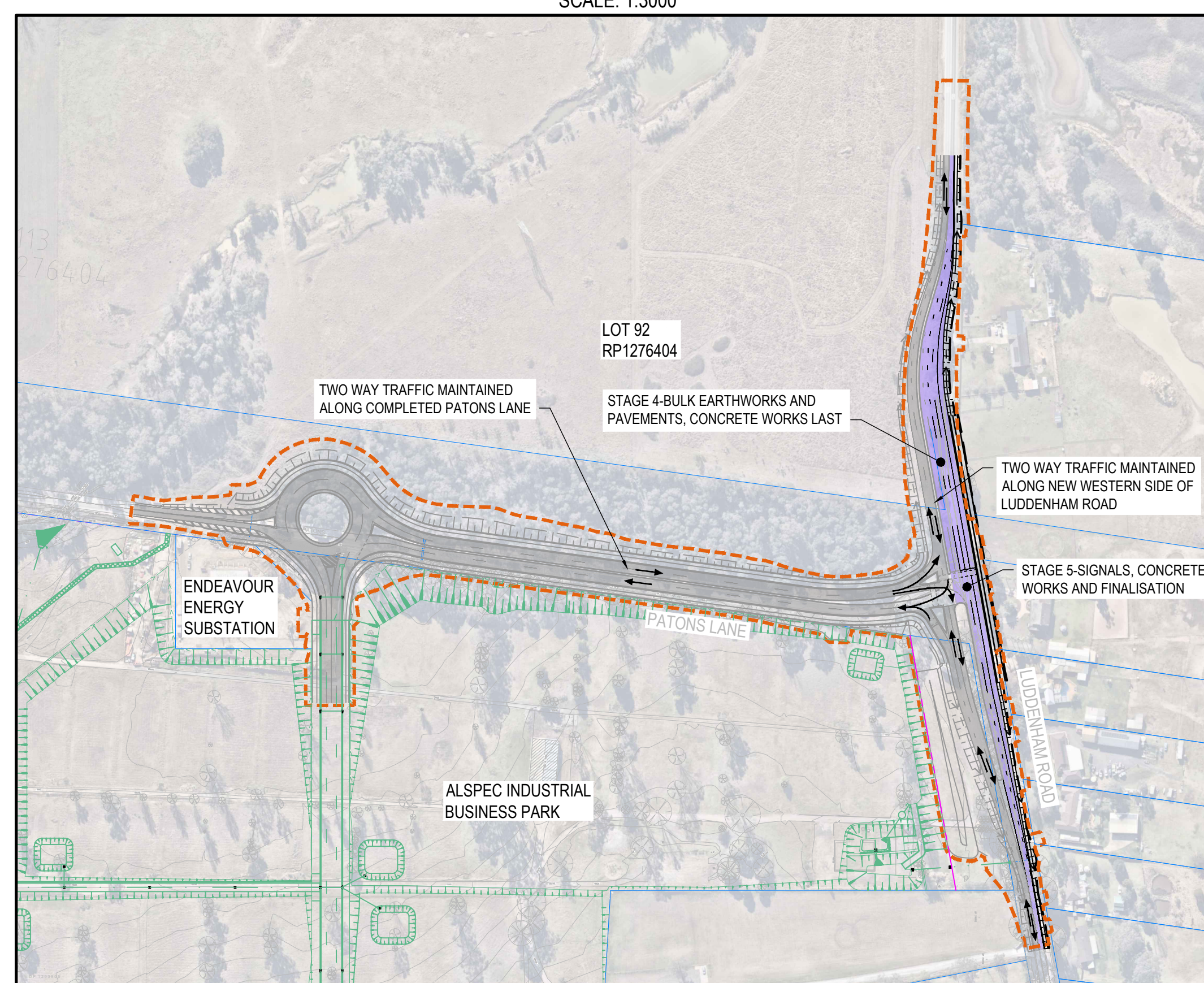
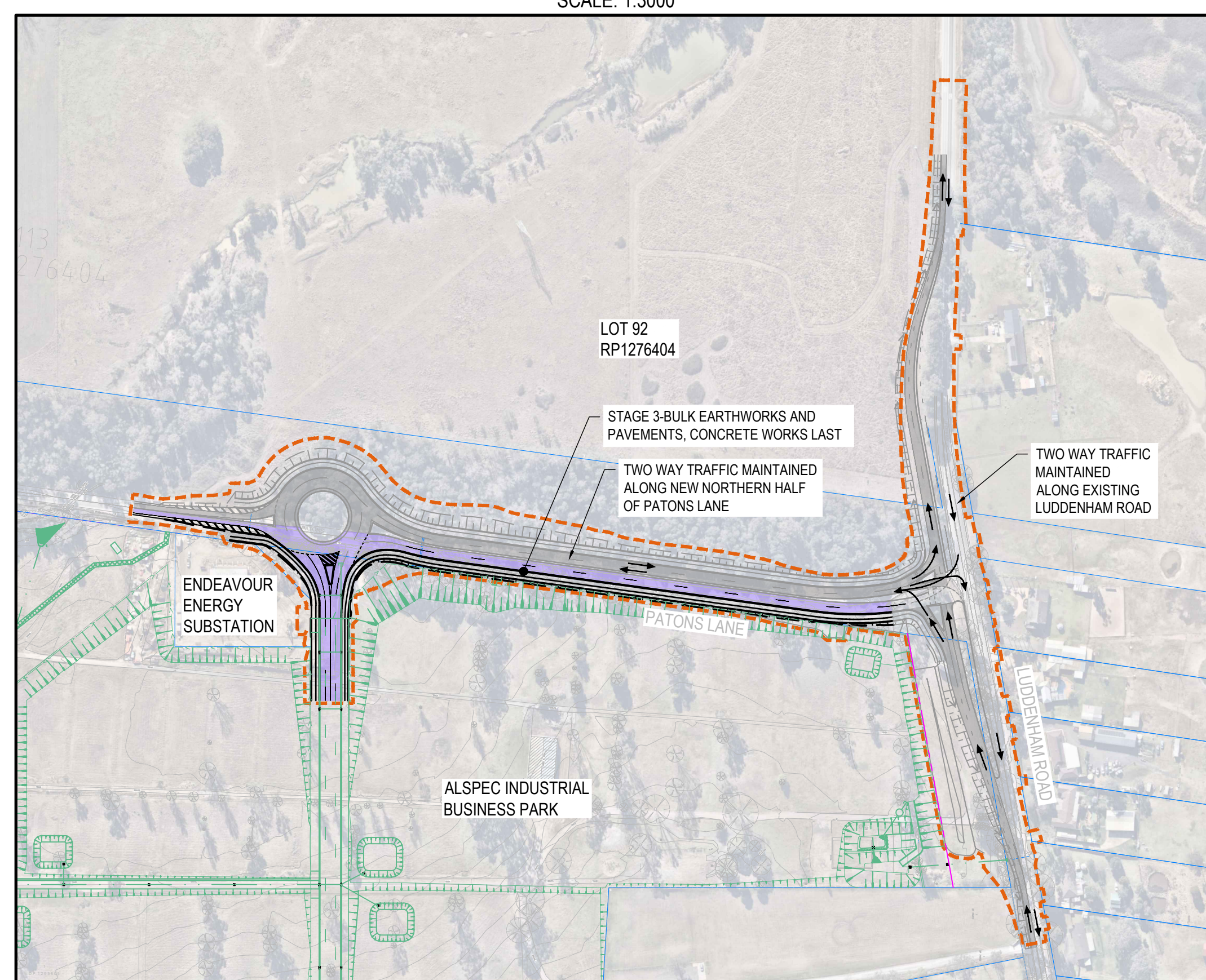
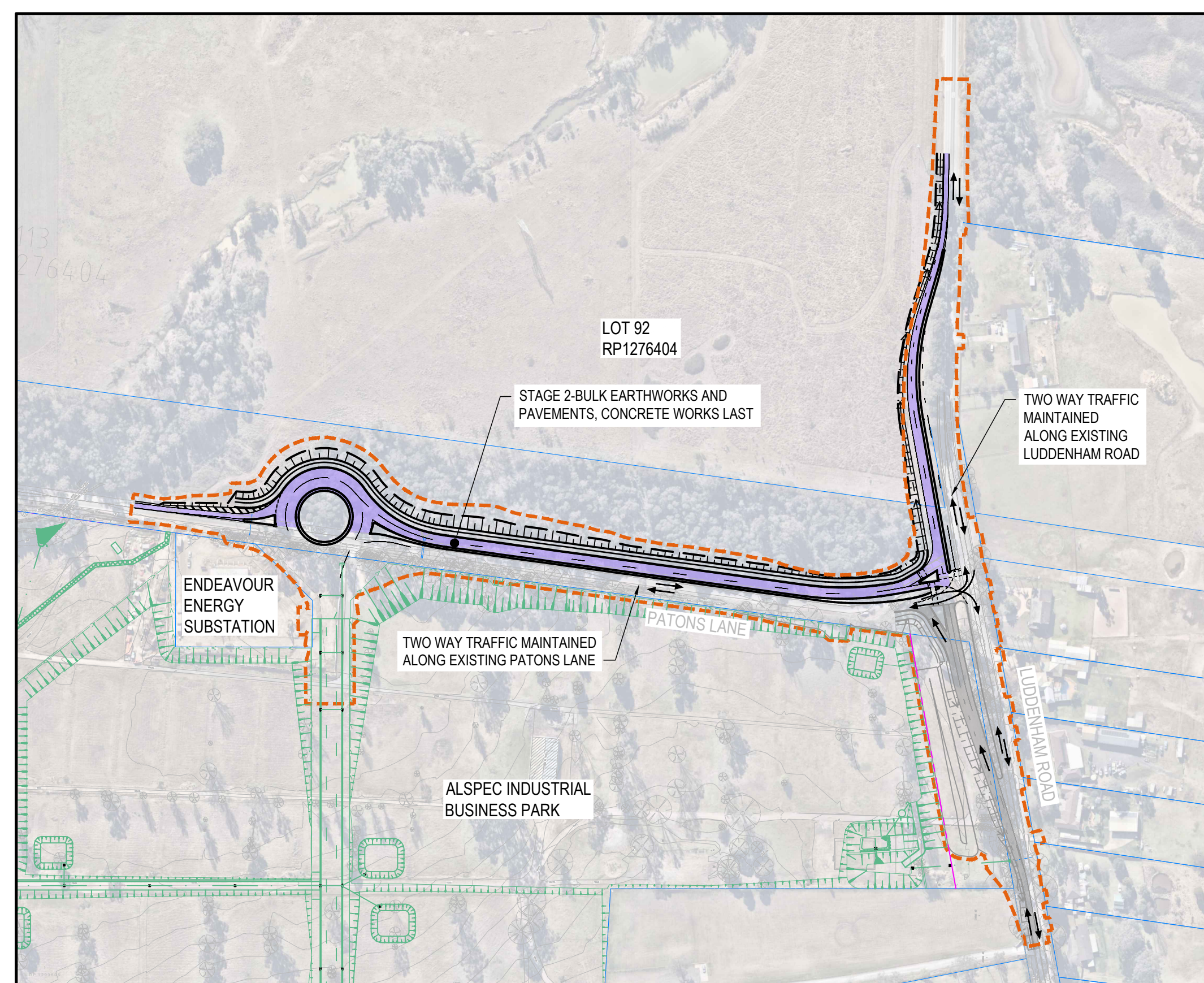
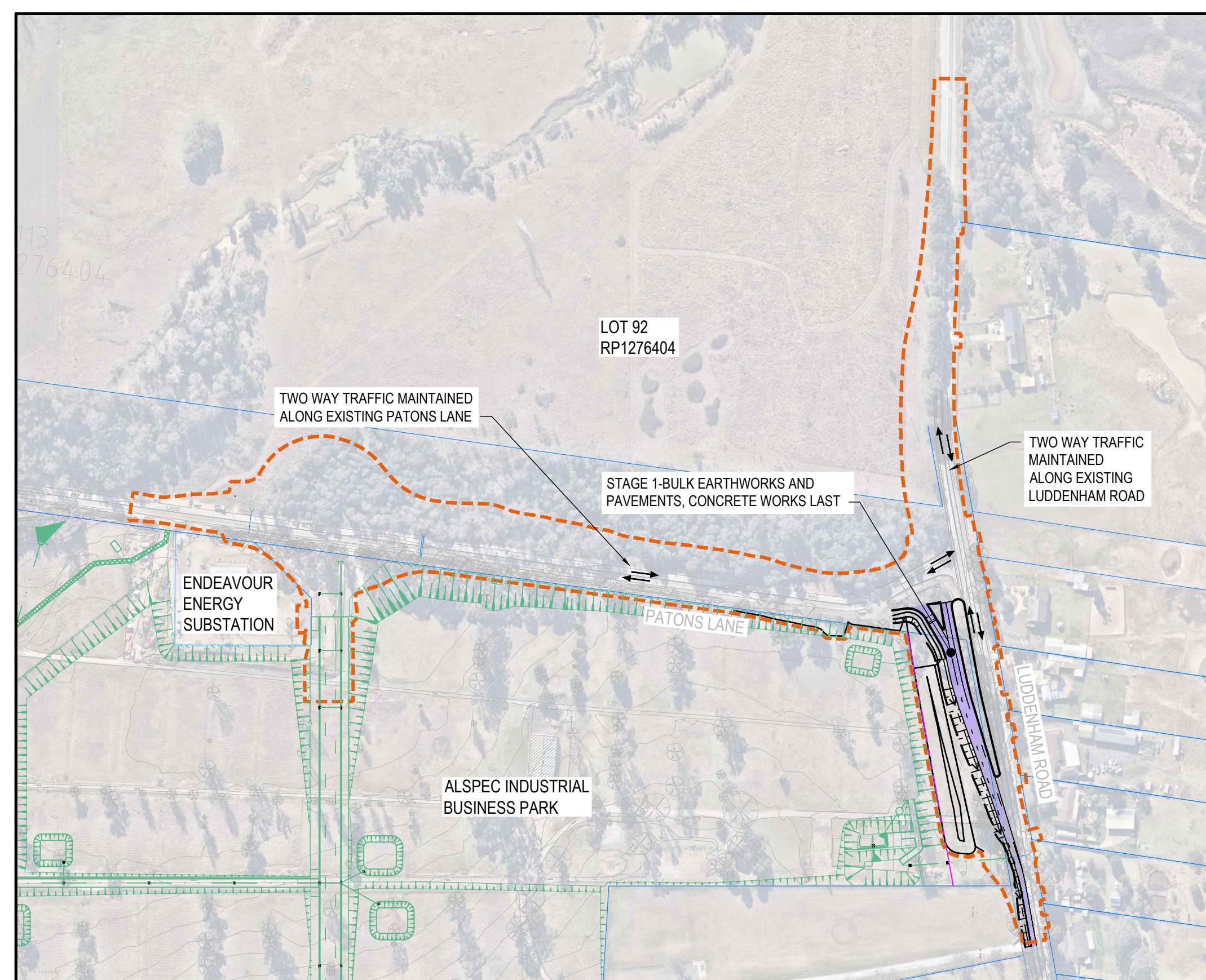
- ✓ Supports continued landfill operation and regional waste capacity.
- ✓ Through and turning movements on Luddenham Road continue to operate at LoS A (no impact to public vehicles).
- ✓ Minor increase to delays and queue on Patons Lane in the AM peak hour.
- ✓ No impact on intersection performance during PM peak hour; intersection will operate as approved.
- ✗ Potential operational constraints for BINGO, which can be managed, noting the BINGO site weighbridge currently closes at 4.30pm.

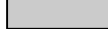
Key outcome:

- Recognising traffic exiting Patons Lane is congested in the PM peak hour, Option 3 would provide mitigation that allows the modification to proceed while not adding to existing congestion, noting this will be relieved when the intersection upgrade is complete.

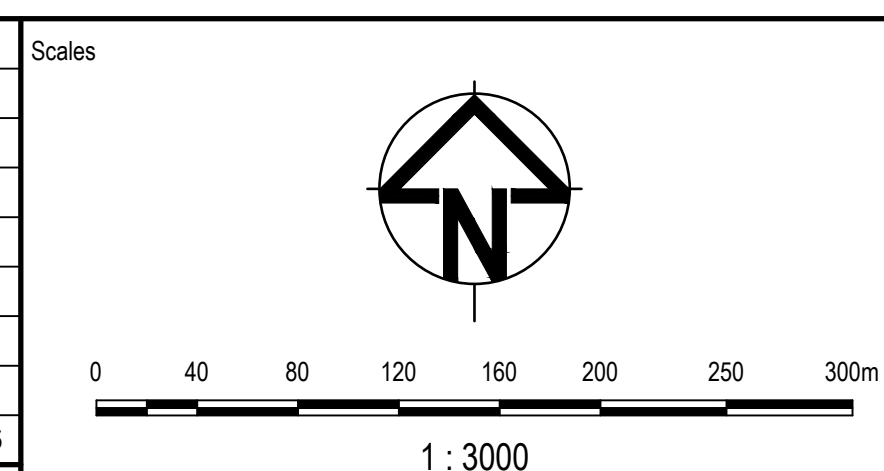


Attachment B – Intersection Upgrade Staging Plan



- ## LEGEND
- | | |
|---|------------------------------------|
|  | EXTENT OF WORKS |
| | INTERNAL ESTATE DESIGN (BY OTHERS) |
|  | EXISTING TREES TO BE REMOVED |
|  | PROPOSED ROAD PAVEMENT |
|  | COMPLETED ROAD PAVEMENT |
|  | TRAFFIC FLOW ARROW |

01	FOR CONCEPT DESIGN	RD	SH	SH	11.03.25
Issue	Description	DR	CH	VE	Date



Status	CONCEPT DESIGN NOT TO BE USED FOR CONSTRUCTION		
© Copyright reserved			
Original Issue Signatures			
Drawn	R.DIESTA	Original Size	A1
Designed	K.ROBINSON	Height Datum	AHD
Project Manager	S.HAYCOCK	Grid	MGA56-GDA202
Verified	S.HAYCOCK		

Project	ALSPEC INDUSTRIAL BUSINESS PARK
Title	CONSTRUCTION STAGES PLAN

