



4 June 2026

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MRA Consulting Group
Attention: Esther Hughes
Suite 408 Henry Lawson Building
Drummoyne NSW 2047

Dear Esther,

Re: Traffic Engineering Response to TfNSW, DPHI and MidCoast Council RFI - NALG MidCoast Compost Facility

This letter has been prepared in response to the matters raised by:

- Transport for NSW in their review of the Environmental Impact Statement (EIS) for the subject site dated 12 March 2026,
- The Department of Planning, Housing and Infrastructure (DPHI) in their Request for Additional Information dated 6 April 2026, and
- MidCoast Council in their comments provided to the DPHI dated 9 April 2026.

The EIS included the Transport Impact Assessment (TIA) prepared by Headway Traffic & Transport dated 19 January 2026.

With reference to the revised architectural plans, the following responses are provided.

Comment	Response
<i>Transport for NSW</i>	
1. The Traffic Impact Assessment (TIA) excludes Ton O' Fun Road which reduces the reliability of the modelling outcomes for The Lakes Way / Failford Road intersection.	The TIA included traffic volume counts at the intersection of The Lakes Way, Failford Road and Ton O' Fun Road. The recorded volumes on Ton O' Fun Road were low, with 7 and 9 vehicles exiting, and 7 and 16 vehicles entering during the AM and PM peak hours, respectively. These volumes are not expected to materially influence the operation of The Lakes Way / Failford Road intersection. Notwithstanding this, the turning movements to and from Ton O' Fun Road were conservatively reassigned to the

Comment	Response
	corresponding movements on The Lakes Way and Failford Road in the SIDRA modelling. This approach ensures that the potential impact of Ton O' Fun Road traffic is accounted for, and therefore the exclusion of the leg as a separate approach does not affect the reliability of the modelling outcomes to understand the LoS for Failford Road.
2. The TIA does not provide a turn-lane warrant assessment or analysis of deceleration / storage length or acceleration lane length required at The Lakes Way / Midge Orchid Road intersection in accordance with Austroads requirements. Please provide this assessment, including consideration for heavy vehicles to accelerate and merge at a minimum of 80% of the through vehicle speed, being 100km/h.	A review of turn lane warrants and adequacy of existing acceleration and deceleration lane provisions has been undertaken with reference to Austroads guidelines. This is presented in Section 6.7 and Section 6.8 of the updated TIA. The findings demonstrate that the existing intersection treatments including associated storage and acceleration provisions are appropriate for the level of heavy vehicle demand associated with the development.
3. The proposal indicates B-Doubles will access the site via The Lakes Way / Midge Orchid Road intersection. Please provide swept path analysis to demonstrate vehicles can safely and efficiently navigate the intersection.	The proposal has been revised to accommodate vehicles up to semi-trailer in size only, with B-doubles no longer proposed to access the site. The intersection of The Lakes Way and Midge Orchid Road is an existing rural intersection that currently accommodates heavy vehicle movements, including vehicles up to semi-trailers. Vehicles up to semi-trailer are consistent with Austroads' 19-m articulated vehicle which are typically adopted as design vehicle for intersections of this classification. As such, it is considered that semi-trailers can safely and efficiently navigate the intersection. A detailed swept path assessment is considered not necessary.
4. Midge Orchid Road is not currently an approved B-Double route under the National Heavy Vehicle Regulator (NHVR). Where the proposed development relies on access by B-Double vehicles, it should be clearly demonstrated, prior to determination of the	With the proposed delivery vehicles revised to consist of vehicles up to semi-trailers only, B-double access is no longer required. Accordingly, the use of Midge Orchid Road as a B-double route and associated NHVR approvals are not applicable to the proposal. The revised vehicle type is

Comment	Response
application, that the road is capable of safely accommodating these vehicle types. This should include an assessment of the suitability of Midge Orchid Road and associated intersections, having regard to factors such as road geometry, pavement capacity, swept paths, intersection design and overall network safety and efficiency. In addition, confirmation should be provided that the relevant approvals from the NHVR can be obtained, including any application required to designate Midge Orchid Road as an approved B-Doble route, prior to commencement of operations involving B-Double vehicle access to the site.	consistent with the existing function and operation of the local road network.
<i>Department of Planning, Housing, and Infrastructure</i>	
5. The Traffic Impact Assessment and Noise Impact Assessment contain contradictory information. Please clarify the number of heavy vehicles per day and per hour, and update the relevant assessment(s) accordingly.	The TIA originally assessed up to 35 heavy vehicle movements per day, with a maximum of 6 heavy vehicles in any given hour accessing the site. These estimates were provided by NALG based on the proposed operational capacity and vehicle sizes. Following a revision to vehicle sizes, the total number of heavy vehicles has been updated to 42 movements per day. However, the updated estimates provided by NALG indicate that hourly volumes are generally lower, with up to five heavy vehicles per hour, except for a single hour (11:00 am) where up to seven vehicles may occur. This period falls outside the identified peak hours at the surrounding road network. As the revised peak hour heavy vehicle volumes are lower than those previously assessed in the TIA, the SIDRA modelling has not been updated and is considered to remain conservative.

Comment	Response
6. Provide a swept path analysis for a heavy vehicle unloading liquid waste.	The swept path diagrams have been updated to include heavy vehicles accessing the designated areas for unloading of liquid waste. Refer to Drawing Nos. MRA 2501-DC-004 and MRA 2501-DC-005. Loading and unloading operations will occur in different areas. Liquid waste unloading will occur either within the receivals area or inside the pre-treatment building while loading will occur in the covered loading area at the northern end of the circulation roadway.
7. Provide a swept path analysis for a heavy vehicle loading product while another vehicle is simultaneously unloading liquid waste.	
8. Describe how onsite traffic will be managed to avoid conflicts.	On-site traffic will be managed to minimise potential conflicts through the following measures: • Scheduling of deliveries to avoid peak periods and overlap of vehicle movements, • Provision of designated loading and unloading areas to separate heavy vehicle activity from other site users, • Implementation of a driver code of conduct to regulate driver behaviour and on-site movements, • Controlled site access arrangements to manage vehicle entry and exit in an orderly manner, and • Preparation of a Signage and Line Marking Plan at the detailed design stage to clearly define circulation paths, priority movements and conflict points. These measures will ensure that vehicle movements within the site are organised and predictable, thereby reducing the potential for conflicts between vehicles and other site users.
9. The EIS states that delivery of inputs and collection of products will occur 24 hours a day, 7 days per week; however, the TIA indicates that truck movements would be limited to daytime	Refer to Item 5 for the updated truck numbers. It is noted that the facility will permit 24-hour, 7-day operations to allow occasional night-time deliveries which have been excluded from the assessment calculations. Any such movements are expected to occur during off-peak periods

Comment	Response
hours. Please clarify and update the documentation accordingly.	and are therefore not anticipated to result in noticeable impacts on the surrounding road network.
<i>MidCoast Council</i>	
10. There are concerns about queue lengths and interaction between stored and passing vehicles for the right turn lane from The Lakes Way to Midge Orchid Rd. This turn lane is approx. 65m in length which might be inadequate to store current and additional generated vehicles in a peak hour. Further assessment should be carried out.	The SIDRA modelling results indicate that 95th percentile back of queue length at the right turn lane from The Lakes Way to Midge Orchid Road is less than one vehicle or 3 metres across all assessment scenarios. This indicates that the existing turn treatment will provide sufficient storage capacity; hence, additional storage length or modification to the existing turn lane is not warranted.
11. Midge Orchid Rd is an urban industrial road and as per Auspecs 0041, a 13m wide road pavement is required. This can be a conditional matter. Currently, the road has varying width with majority being 8m wide.	NALG will be negotiating with Council to upgrade Midge Orchid Road. The subject area is outside the proponent's consent area, and a separate application would be required to widen it. Conditioning this requirement would be appropriate.

Table 1. Response to Council Comments

The TIA has been updated to reflect the above response and is attached to the end of this letter.

If you require further details regarding the above, please contact me.

Kind Regards,



Michael Palamara
Director Traffic & Transport Engineer
Headway Traffic and Transport Pty Ltd



Attachment 1 Updated Transport Impact Assessment