

12 March 2026

File No: NTH25/00248/003
Your Ref: SSD-84090218

Director
Department of Planning, Housing & Infrastructure
NSW Major Projects Portal

Attention: Esther Hughes

Review of Environmental Impact Statement for Mid Coast Regional Organics Processing Solution at Lot 5//DP1089990; 48 Midge Orchid Road, Darawank

I refer to the abovementioned State Significant Development Application referred to Transport for NSW (TfNSW) on 18 February 2026 for comment in accordance with section 56 (2)(b)(i) of Environmental Planning & Assessment Regulation 2021.

TfNSW key interests are the safety and efficiency of the transport network, the needs of our customers and the integration of land use and transport in accordance with the [Connecting NSW Strategy](#).

The Lakes Way (MR692) is a classified (State) road and Midge Orchid Road is a local road. Council is the roads authority for both roads and all other public roads in the area, in accordance with Section 7 of the *Roads Act 1993*.

TfNSW has reviewed the information provided and is unable to properly assess the potential impacts on the transport network due to insufficient information. TfNSW has identified the following matters that require further consideration:

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.
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.
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.
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 application, that the road is capable of safely accommodating these vehicle types.

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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.

Note: Council as the road authority for Midge Orchid Road are responsible for seeking approval from the NHVR.

TfNSW is available to review any further information submitted in relation to the development application or to meet with DPHI and the Applicant to further discuss TfNSW comments. Should you require further information please contact Kane Hitchcock, Development Services Case Officer, on 1300 207 783 or by emailing development.north@transport.nsw.gov.au

Yours faithfully



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