

9 April 2026

Department of Planning Housing & Infrastructure
12 Darcy Street,
Parramatta, NSW 2150

Ref: SSD-84090218
Enquiries: Craig Wilkinson

Att: Emma Barnet

**State Significant Development – SSD-84090218 – MidCoast Regional Organics Facility
– Council Comments on Application**

With reference to the current State Significant Development, being SSD-84090218, MidCoast Council wishes to provide the following comments:

DEVELOPMENT CONTRIBUTIONS:

Council will require the payment of contributions in accordance with the *Section 94 Development Contributions Plan – Great Lakes Wide*. As the development falls within the catchment for this contribution plan, Council requests that conditions of consent requiring the payment of contributions in accordance with the relevant plan(s) be imposed.

DEVELOPMENT ENGINEERING:

With regards for Development Engineering matters, the following comments are provided for consideration:

- 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.
- 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.

ENVIRONMENTAL HEALTH:

With regards for Environmental Health matters, the following comments are provided for consideration:

Noise Impacts

The acoustic report prepared by Koikas Acoustics Pty Ltd, dated 12 January 2026, appears to have been generally prepared in accordance with the *Noise Policy for Industry (2017)*. However, please note the following in relation to the report:

The report identifies the dwelling at 661 The Lakes Way as a sensitive receiver. However, it is noted that a three-lot subdivision has been approved on this property, with the potential for a dwelling to be constructed to the north of the existing residence, closer to Midge Orchid Road, Darawank. The report has not considered this potential receiver, which may be subject to greater noise impacts from truck movements associated with the development, particularly vehicles entering and exiting Midge

Orchid Road, Darawank. It is recommended that the acoustic report be amended to include assessment of this receiver.

Odour and Air Quality

The Air Quality Impact Assessment report prepared by Todoroski Air Sciences Pty Ltd, also dated 12 January 2026, appears to have been generally prepared in accordance with the *NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* and the assessment checklist incorporated within the *Local Government Air Quality Toolkit*. However, similar to the matter raised as part of the noise impact assessment, an additional receiver is requested to be included as part of the report.

The report identifies the dwelling at 661 The Lakes Way as a sensitive receiver. However, it is noted that a three-lot subdivision has been approved on this property (DA246/2018), with the potential for a dwelling to be constructed to the north of the existing residence, closer to Midge Orchid Road, Darawank. The report has not considered this potential receiver, which may be subject to greater air quality and odour impacts from this facility. It is recommended that the air quality and odour assessment report be amended to include assessment of this receiver.

ECOLOGY:

With regards for ecological matters, the following comments are provided for consideration:

It is noted that there is a minor error in the BDAR. The BDAR states that only one hollow-bearing tree was found on site which is within the Endangered Ecological Community (EEC) proposed to be retained, and so no compensatory nest boxes are proposed. However, in Appendix 2 of the Arborist Report, Plate 2 contains a photo of a Blackbutt identified as 'Tree 21' showing multiple hollows - this tree is proposed to be removed. Due to the presence of squirrel gliders on the site and the lack of hollow bearing trees, this tree should be retained within the landscaping at the front of the site. If this is not feasible, compensatory nest boxes should be provided within trees to be retained on the site.

Further information is required on the impact of the development on groundwater levels and the subsequent impact on the retained Swamp Sclerophyll Forest EEC, which is a groundwater dependent ecosystem. Also, the potential impacts of surface water being discharged directly into the EEC should be examined including the measures proposed to protect the EEC from stormwater impacts, e.g. greater setbacks to the EEC and replacing the spillway with a level spreader.

It is also recommended that the proponent pursue a local biodiversity offset to meet its credit obligation rather than retiring credits from outside the LGA or paying directly into the fund. This could be achieved by establishing a Biodiversity Stewardship Agreement on a suitable parcel of land and paying the Total Fund Deposit to retire the necessary credits and fund the management of the site to improve biodiversity at the local scale. We believe that this approach is capable of being conditioned.

If you have any questions or queries in relation to the above details, please feel free to contact me.

Kind regards



Craig Wilkinson
Senior Development Planner