

Planning Approval Consistency Assessment Form

SM ES-FT-414

Sydney Metro Integrated Management System (IMS)

Assessment Name:	Revised footprint for the Luddenham Road construction site
Prepared by:	Sydney Metro
Prepared for:	Sydney Metro and SCAW and SSTOM contractors
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1. Existing Approved Project

Planning approval reference details (Application/Document No. (including modifications)):

- SSI_10051 Infrastructure approval – applies to this assessment
- EPBC 2020/8687 – covers the area between St Marys to Elizabeth Drive and applies to this assessment
- Western Sydney Airport: Airport Plan (as varied September 2021) - does not apply to this assessment as the proposal would be undertaken outside of the Western Sydney Airport site.

Date of determination:	<ul style="list-style-type: none"> • SSI_10051 Infrastructure approval dated 23 July 2021 • EPBC 2020/8687 Approval dated 3 June 2021 • Western Sydney Airport: Airport Plan as varied 15 September 2021 - does not apply to this assessment 	Type of planning approval:	<p>SSI_10051: Critical State Significant Infrastructure (SSI_10051) under Environmental Planning and Assessment Act 1979 (NSW)</p> <p>EPBC 2020/8687: construct and operate a rail link from St Marys to Elizabeth Drive as a controlled action under Environment Protection and Biodiversity Conservation Act 1999 (Cth)</p> <p>Western Sydney Airport: Airport Plan (as varied September 2021): Variation to the Airport Plan under the Airports Act 1996 (Cth) - does not apply to this assessment and is not considered further.</p>
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Relevant background information (including EA, REF, Submissions Report, Director General's Report, MCoA):

- Sydney Metro – Western Sydney Airport Environmental Impact Statement, including accompanying technical papers (SM-WSA EIS) (October 2020)
- Sydney Metro – Western Sydney Airport Submissions Report (April 2021)
- EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687)
- Instrument of Approval (SSI_10051) (dated 23 July 2021)
- SSI 10051 Modification 1 (dated 14 April 2022)
- SSI 10051 Modification 2 (dated 20 December 2024)
- EPBC 2020/8687 Approval dated 3 June 2021, varied 12 September 2024
- Consistency Assessment SM006 Revised footprint for the Luddenham Road construction site Rev0.4 (dated 4 November 2022)

The above documents are available on the NSW Major Projects portal here: <https://www.planningportal.nsw.gov.au/major-projects/projects/sydney-metro-western-sydney-airport> and <http://epbcnotices.environment.gov.au/referralslist/#>

The proposal identified in this assessment would be undertaken in accordance with the performance outcomes (POs) and Revised environmental mitigation measures (REMMs) identified in the EIS, Submissions Report, EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687) and the relevant conditions of approval.

Description of existing approved project you are assessing for consistency:

The Luddenham Road construction site and location of the future station precinct for the Sydney Metro – Western Sydney Airport (SM-WSA) project has been assessed within the Environmental Impact Statement (EIS), the Submissions Report and the EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687).

Environmental Impact Statement

Construction

The Luddenham Road construction site would be located north of Luddenham Road at Luddenham. The construction site would support the construction of Luddenham Road Station and the viaduct section of the rail alignment in this location. Key construction works would include:

- Construction of Luddenham Road Station, station structures and finishes
- Construction of the viaduct section of the rail alignment
- Station precinct works which includes a bus layover area and park and ride facility with 200 spaces (with the potential for a future expansion to a multi-deck facility).

The indicative layout of the Luddenham Road construction site is shown in Figure 1 of Appendix A.

As discussed in section 8.9.7 of the EIS, localised upgrade of Luddenham Road is proposed to support provision of construction access and subsequent permanent access arrangements into the Luddenham Road Station precinct. Temporary road network adjustments would include road modifications and traffic signal works to facilitate the movement of construction vehicles and measures to ensure the ongoing function and safety of existing transport networks. The modifications are subject to further design development and construction planning and would also be reviewed and confirmed by the construction contractor(s).

Section 1.2.3 of Appendix B of the Submissions Report states that a series of fill embankments and cuttings would be required along the length of the project and that batters for cuts and embankments would be designed to minimise property impacts, maintenance requirements and reduce urban design impacts. Section 2.4.2 also states that earthworks (for example, cuttings and embankments) would be required at locations along the project alignment to achieve required levels for the surface track alignment

Section 2.2 discusses the enabling works required to facilitate construction activities including supplying water, power and other utilities to construction sites and other areas within the construction footprint.

Operation

The proposed Luddenham Road Station would include the following precinct and interchange elements:

- Secure bicycle parking
- Park-and-ride facilities, with up to 200 spaces (with the potential for future expansion to a multi-deck car park)
- Transport interchange facilities including bus bays, associated shelters, bus layover facilities (located under the viaduct structure), as well as kiss-and-ride bays and point-to-point vehicle facilities
- Upgrades to Luddenham Road where new intersections to the precinct are proposed, new pedestrian crossings and creation of a new public plaza/urban domain adjacent to the proposed station entrance
- Built elements to allow for potential future station retail and other station activation opportunities (fit out and use of retail spaces would be subject to separate approval, where required).

An indicative operational layout of Luddenham Road Station is shown in in Figure 2 of Appendix A.

Submissions Report

As identified in section 4.5.3 of the Submissions Report, an organisation provided a submission on the EIS that raised concerns about the projects proposed layout of roads and intersections with Luddenham Road and whether these would align with the Sydney Science Park and Western Sydney Planning Partnership Precinct Plans.

The Submissions Report noted that the road alignment was indicative only and subject to design development. The Submissions Report also identified that this design development would be undertaken in consult with key stakeholders responsible for the wider precinct and transport network development. Mitigation measure (OLU2) requires Sydney Metro to continue to consult with key stakeholders during design development of the station interchanges and precincts.

EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687)

The relevant controlling provisions for the EPBC controlled action relate to Commonwealth land and listed threatened species and communities. The Luddenham Road construction site is not identified as Commonwealth land. No threatened ecological communities (TECs) and threatened flora and fauna species listed under the EPBC Act were recorded within this area. However, there is some limited habitat for threatened fauna species including potential foraging habitat for the Grey-headed flying fox which is listed as vulnerable under the EPBC Act.

2. Description of proposed change which is the subject of this assessment

A previous version of this consistency assessment (Rev 0.4) was endorsed to revise the construction site and location of the future station precinct including additional road modifications along Luddenham Road for construction vehicle access and permanent access to the future precinct. This change was initiated following design development and consultation with key stakeholders.

This updated consistency assessment makes further changes to the construction site, which are needed to complete the batter and service installation along the west of the alignment at Luddenham Road (refer figure 3 in Appendix A). This additional area was part of the original construction footprint as assessed in the EIS but was excluded from the previous consistency assessment to minimise impacts to the adjoining landowner.

This consistency assessment updates the construction site for Luddenham Road and the assessment of the proposal assumes that:

- The construction methodology and activities within the construction site would remain unchanged
- The number of indicative permanent property acquisition and temporary leases would remain unchanged, although the extent of the proposed acquisition and leasing (as identified in the EIS) has been revised
- All access provisions required for ongoing maintenance and operations will be maintained
- There are no changes to the operation of the project as a result of this revised construction site and road modifications.

The proposed revised footprint for the Luddenham Road construction site is shown in Figure 3 of Appendix A and road modification works are shown in Figure 4.

3. Timeframe

There are no proposed changes to the construction program as outlined in the EIS.

4. Site description

The proposal has been previously located within Lot 4 DP1242470, Lot 4 DP 1255721 and Lot 5 DP1255721. The permanent acquisition area for the proposal has been acquired and is now owned by Sydney Metro. The Deposited Plan for acquisition of Lots/DPs affected by the proposal has been registered with the NSW Land Registry Services. The proposal would be located within the newly registered Lot 203 DP1280188, Lot 201 DP1280188 and Lot 205 DP1280188.

The updated consistency assessment would also require the temporary use of part of Lot 2 DP1276320 which is owned by others. Use of this land for construction and permanent works are subject to landowner consent.

The location of the proposal is shown in Figure 3 of Appendix A.

5. Site Environmental Characteristics

The existing environment within the Luddenham Road construction site consists of cleared land used for agriculture. The land on which the proposal is located is largely cleared with small remnant patches of native vegetation. The proposal is located north of Luddenham Road in Luddenham. An un-named tributary of South Creek and an associated large waterbody is located adjacent to and within the proposal. Non-perennial drainage lines and small waterbodies are also located within the proposal area.

The land uses in this area include large rural properties with some semi-rural residential properties bordering Luddenham Road within an open, rural landscape. The area also includes a number of agricultural uses including equine and poultry facilities and market gardens.

The land is predominately cleared with exotic grasslands and small isolated fragments of native vegetation which comprise threatened ecological communities (TECs) listed under the NSW *Biodiversity Conservation Act 2016* (BC Act). No listed threatened flora species have been recorded within this area and surrounds. There is potential for limited habitat for listed threatened fauna species under the BC Act and EPBC Act.

There are no areas of Aboriginal heritage sensitivity identified within the proposal. The Luddenham Road construction site has been subject to impacts under Aboriginal Heritage Impact Permit (AHIP) C0003861 and archaeological values have been removed in accordance with the conditions of the AHIP (refer to Appendix B).

The proposal includes additional road modifications along Luddenham Road which is an item of local heritage significance under the *Penrith Local Environmental Plan 2010*.

6. Justification for the proposed change

Mitigation measure (OLU2) requires Sydney Metro to continue to consult with key stakeholders during design development of the station interchanges and precincts. The proposal is required to better align the Luddenham Road construction site and future station precinct with the Sydney Science Park Master Plan and the Western Sydney Planning Partnership Precinct Plans. The proposal will align with a whole of government approach to the future precinct development and allow for successful precinct activation of Luddenham Road Station by Sydney Metro.

The proposal has been developed to align with strategic planning and re-zoning as developed by the Planning Partnerships Office (PPO) and approved by Department and Planning and Environment (DPE). The proposal has been developed in consultation with relevant stakeholders including the Sydney Science Park proponent, Transport for NSW and Council. The need for a round-about and new access road alignment into the Luddenham Road station has been identified during consultation as part of the strategic planning process by the PPO and to address issues associated with intersection modelling for future developments along Luddenham Road. The following design changes to the Luddenham Road station are also required to ensure alignment with the wider precinct's strategic planning:

(Uncontrolled when printed)

- revised internal precinct roads for Luddenham Road station to align with strategic planning and the Sydney Science Park Master Plan
- re-location of the bus layover for greater proximity to Luddenham Road for enhanced travel mode integration
- re-location and re-design of commuter parking to adequately service Sydney Metro customers.

The updated construction boundary is needed to complete the batter and service installation along the west of the alignment at Luddenham Road.

7. Environmental Benefit

The primary benefit of the proposal is better alignment with the Sydney Science Park Master Plan and the Western Sydney Planning Partnership Precinct Plans which may provide enhanced outcomes for the community and customers. The proposal would also provide enhanced transport integration outcomes for the project and allow installation batters and services.

8. Control Measures

Will a project and site specific EMP be prepared?	<input checked="" type="checkbox"/> Yes	Are appropriate control measures already identified in an existing EMP?	<input checked="" type="checkbox"/> Yes
	<input type="checkbox"/> No		<input type="checkbox"/> No

9. Conditions of approval

Will the proposal be consistent with the conditions of approval?	<input checked="" type="checkbox"/> Yes
	<input type="checkbox"/> No

10. Impact Assessment – Construction

The proposal is not predicted to have a material impact to other environmental issues which were assessed in the EIS and as such, detailed environmental assessment is not provided. The revised consistency assessment includes an area and activities that were previously assessed in the EIS and Submissions Report and form part of the approved project.

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
Flora and fauna	<p>A site survey has been completed by an ecologist to investigate the biodiversity values of the proposal and is summarised in this section. The majority of the proposal comprises areas of improved pasture (grazing paddocks) dominated by exotic species. There is a row of miscellaneous ecosystem plantings located adjacent to Luddenham Road.</p> <p>A small, isolated patch of native vegetation is located in the north-eastern part of the additional area of the revised footprint and is identified as Plant Community Type (PCT) 849 Thinned (refer to Figure 3 in Appendix A). There is approximately 0.08 ha of PCT 849 Thinned in the additional area.</p> <p>The patch of PCT 849 Thinned located within the additional area of the revised footprint comprises <i>Cumberland Plain Woodland</i> which is listed as a Critically Endangered Ecological Community under the NSW <i>Biodiversity Conservation Act 2016</i>. The patch of PCT 849 Thinned does not meet the condition thresholds to comprise a TEC under the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i>.</p> <p>Clearing of the patch of PCT 849 Thinned for the proposal would be required. The additional 0.08 ha of PCT 849 is estimated to generate an</p>	The area of PCT 849 Thinned must be included in the project biodiversity offset liability and credit retirement undertaken prior to clearing, in accordance with the planning approval	Y	Y	N/A

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
	<p>additional 3 ecosystem credits under the NSW Biodiversity Assessment Method (BAM). The slight increase in the area of PCT 849 proposed to be cleared would be offset by the reduction in impacts to 0.14 ha of PCT 724 (and associated 3 ecosystem credits) in an area previously assessed for the project in the Revised BDAR.</p> <p>Sydney Metro have reduced offset credit requirements for the SM-WSA project during detailed design and construction planning. As such, the addition of approximately 3 PCT 849 ecosystem credits would not exceed offset requirements as identified in Condition E4 of SSI 10051. The Department of Environment and Planning (DPE) has been notified of the proposed change in vegetation clearing areas and associated biodiversity offset requirements.</p> <p>No threatened flora or fauna species were observed in the additional areas during the field survey. The patch of PCT 849 Thinned does not have a shrub layer and the ground layer is dominated by exotic species. There is a low likelihood that any threatened plant species are present given the poor condition of the habitat. Additionally, given the disturbance, lack of habitat features (no hollow-bearing trees observed), and the isolation of this small patch of trees in a paddock it is unlikely to provide a significant resource for threatened fauna species. No additional species credits are likely to be required for the proposal.</p> <p>No change from the approved project.</p>				

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
Water	<p>The proposal is generally located outside the five per cent Annual Exceedance Probability (AEP) flood event. Small areas of the proposal site are predicted to experience 0.1 to 0.5 flood depths during the five per cent AEP event due to intersection with minor overland flow paths. The proposal would not result in any material change to impacts on the local flooding regime and water quality of waterways during construction as assessed within the EIS. There may be a minor change associated with an increase in the area of the construction footprint for the Luddenham Road construction site which would increase the volume of runoff. Any flood impact is likely to be minimal and would be managed in accordance with existing measures.</p> <p>Flood events during construction also have the potential to temporarily impact on construction sites and construction activities. The layout of construction compounds within the proposal would need to consider the condition and storage characteristics of the nearby waterbodies to minimise potential downstream impacts during a rainfall event in accordance with REMM HYD1.</p> <p>The revised consistency assessment would impact a large body of water on the western boundary however this area was originally assessed as part of the SM-WSA EIS and Submissions Report and there would be no change from the approved project.</p> <p>Batter slope design would be managed in accordance with REMM OWQ1 and OLV6.</p>	No additional measures required.	Y	Y	N/A

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
Soils and contamination	<p>The proposal is within a medium risk area of environmental concern (AEC) located between 565 to 581 Luddenham Road. Potential contamination sources include potential asbestos containing pipelines, isolated asbestos containing materials in soil from former buildings and isolated zinc exceedance in soil.</p> <p>The proposal would not result in any change to the potential contamination sources and overall risk ratings, compared to the approved project. However, the AEC may extend to additional areas required for the proposal and would be subject to the same assessment and management requirements.</p> <p>The Soil and Water Management Plan would incorporate detailed site inspections and review of further available information for medium risk AECs prior to the start of construction. If the medium risk rating is maintained or upgraded for the AEC including the proposal area, investigation of potential contamination would be undertaken as per CoA D71, and if contamination is identified managed in accordance with the subsequent conditions, or the Soil and Water Management Plan as appropriate.</p> <p>No change from the approved project.</p>	No additional measures required.	Y	Y	N/A
Air quality	No change from the approved project.	No additional measures required.	Y	Y	N/A
Noise and vibration	<p>There are residential and industrial receivers located in proximity to the proposal. The nearest residential receiver is located approximately 25 meters from the proposal along Luddenham Road. The nearest industrial receiver is located</p>	No additional measures required.	Y	Y	N/A

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
	<p>approximately 85 meters from the proposal's access road.</p> <p>The small numbers of receivers located in proximity to the proposal are predicted to be impacted by noise emissions from the project but only to a limited degree.</p> <p>No exceedances of out-of-hours noise management levels (NMLs), highly noise affected management levels, at residential receivers, and no exceedances of NMLs at non-residential receivers are predicted to occur within the proposal's noise catchment area (NCA10).</p> <p>The proposal would move closer to some receivers but would not result in any material change to the potential construction noise impacts assessed in the EIS due to the setback distance to sensitive receivers. The proposal may marginally increase predicted construction noise impacts for some residential receivers along Luddenham Road and industrial receivers in proximity to the proposed access road alignment. These impacts would continue to be managed in accordance with the Construction Noise and Vibration Standard.</p> <p>In relation to construction vibration, the proposal would not result in any predicted increase in vibration impacts at the nearest receivers.</p>				
Aboriginal heritage	The majority of the proposal, except for works along Luddenham Road, is located within Aboriginal Heritage Impact Permit (AHIP) C0003861 for Sydney Science Park, granted 23 July 2018. The permit authorised impacts to Aboriginal Heritage Information Management	No additional measures required.	Y	Y	N/A

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
	<p>System (AHIMS) sites 45-5-4189, 45-5-4707, 45-5-4709 and 45-5-4922. The surface collection and archaeological salvage required under the conditions of the AHIP was completed by 17 March 2020 and the entire AHIP area has been cleared for construction (refer to Appendix B). The proposal's additional road modifications along Luddenham Road are located outside the AHIP area for AHIP C0003861. An AHIMS search undertaken on 23 August 2022 identified one Aboriginal site in proximity to the areas proposed for additional road modifications. This Aboriginal site is located within the approved project and will be managed under the CSSI Aboriginal Cultural Heritage Management Plan (ACHMP).</p> <p>There is low potential for any Aboriginal heritage items or areas of sensitivity to be impacted by the additional road modifications considering the disturbed nature of the road and reserve.</p> <p>No impacts to Aboriginal heritage are anticipated. Any unexpected finds would be managed as per the Sydney Metro Unexpected Heritage Finds Procedure and Exhumation Management Procedure and the CSSI ACHMP.</p> <p>No change from the approved project.</p>				
Non-Aboriginal heritage	<p>The Luddenham Road Alignment is identified as an item of local heritage significance under the <i>Penrith Local Environmental Plan 2010</i> (item no.843). The additional road modifications for the proposal are located within the Luddenham Road Alignment.</p>	No additional measures required.	Y	Y	N/A

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
	<p>The significance of Luddenham Road Alignment is related to the alignment of the road and its landscape setting. No archaeological potential is identified for the road surface, and it is expected that the physical fabric of the early road would have been disturbed by road resurfacing work.</p> <p>No post and rail fencing that contributes to the significance of the item was identified along the additional sections proposed for road modifications.</p> <p>The proposal would not affect the alignment of Luddenham Road or surviving post and rail fencing that contributes to its significance. There is therefore no additional impact to the item as a result of the proposal.</p> <p>Any unexpected finds would be managed as per the Sydney Metro Unexpected Heritage Finds Procedure and Exhumation Management Procedure.</p> <p>No change from the approved project.</p>				
Community and socio-economic	No change from the approved project.	No additional measures required.	Y	Y	N/A
Traffic and transport	<p>The proposal would result in temporary construction impacts to traffic including road network modifications, road closures and detours along Luddenham Road.</p> <p>Potential temporary impacts to traffic performance on the road network due to the temporary addition of construction vehicles and temporary road closures as a result of the project have been assessed within the EIS. The proposal would not</p>	No additional measures required.	Y	Y	N/A

(Uncontrolled when printed)

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
	result in any material change to the temporary road network impacts identified and there is no proposed increase in construction vehicles as a result of the proposal. No change from the approved project.				
Waste and resource management	No change from the approved project.	No additional measures required.	Y	Y	N/A
Visual	No change from the approved project.	No additional measures required.	Y	Y	N/A
Land use and property	The revised footprint would include an additional area of land that is owned by others, however, as this area was originally assessed as part of the SM-WSA EIS and Submissions Report there would be no change from the approved project. Landowners consent for construction and permanent works is required.	No additional measures required.	Y	Y	N/A
Hazard and risk	No change from the approved project.	No additional measures required.	Y	Y	N/A
Management and mitigation measures	The relevant project CoA, performance outcomes (PO), and REMMs are appropriate to manage the potential impacts associated with these works. No changes or additions to these CoA, POs and REMMs are required.	No additional measures required.	Y	Y	N/A

11. Impact Assessment – Operation

The revised consistency assessment includes an area and activities that were previously assessed in the EIS and Submissions Report and form part of the approved project.

Aspect	Nature and extent of impacts (negative and positive) during operation (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project COA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
Flora and fauna	No change from the approved project.	No additional measures required.	Y	Y	N/A
Water	No change from the approved project.	No additional measures required.	Y	Y	N/A
Soils and contamination	No change from the approved project.	No additional measures required.	Y	Y	N/A
Air quality	No change from the approved project.	No additional measures required.	Y	Y	N/A
Noise and vibration	<p>The proposal's access road including the roundabout will be reinstated as a permanent road for the Luddenham Road station. The nearest receiver is located approximately 85 meters from the access road alignment and comprises an industrial shed. The permanent road may marginally increase operational road traffic noise impacts for some industrial receivers in proximity to the road alignment. All new roads built as part of the approved project are expected to comply with the NSW Road Noise Policy (RNP) (DECCW, 2011) criteria.</p> <p>The extended roadworks to improve Luddenham Road would not change the road alignment nor do the works increase the speed or significantly increase traffic volume.</p> <p>No change from the approved project.</p>	No additional measures required.	Y	Y	N/A
Aboriginal heritage	No change from the approved project.	No additional measures required.	Y	Y	N/A
Non-Aboriginal heritage	Permanent indirect impacts associated with alteration of the heritage setting of the Luddenham Road Alignment, an item of local heritage	No additional measures required.	Y	Y	N/A

Aspect	Nature and extent of impacts (negative and positive) during operation (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project COA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
	significance, have been assessed within the EIS. The introduction of the Luddenham Road elevated station and viaduct would alter the rural character of the area, which is part of the heritage significance of this item. The proposal would not result in any material change to the permanent indirect impacts identified and there are no proposed changes to the elevation of the station or viaduct. No change from the approved project.				
Community and socio-economic	The proposal would better align with master planning in the area which may provide enhanced outcomes for the community and customers. Transport integration benefits are discussed below.	No additional measures required.	Y	Y	N/A
Traffic and transport	The proposal will accommodate boundary changes required to deliver road modifications and intersection treatments along Luddenham Road including the proposed roundabout at the intersection of Luddenham Road and the access road to the station (refer to Figure 4 in Appendix A). The proposal would provide enhanced transport integration outcomes for the project and better alignment with street layouts identified in the Sydney Science Park Master Plan and the Western Sydney Planning Partnership Precinct Plans.	No additional measures required.	Y	Y	N/A
Waste and resource management	No change from the approved project.	No additional measures required.	Y	Y	N/A
Visual and urban design	No change from the approved project.	No additional measures required.	Y	Y	N/A

Aspect	Nature and extent of impacts (negative and positive) during operation (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project COA and REMMs	Minimal Impact Y/N	Endorsed	
				Y/N	Comments
Land use and property	<p>The proposal would ensure better alignment with the Sydney Science Park Master Plan and the Western Sydney Planning Partnership Precinct Plans.</p> <p>The final design of permanent built works and landscape design would be captured within the Place, Urban Design and Corridor Landscape Plan (PUDCLP) as per Condition E77 of SSI 10051. The PUDCLP would include interchange access plans developed in consultation with the Traffic and Transport Liaison Group.</p> <p>The revised footprint would include an additional area of land that is owned by others, however, as this area was originally assessed as part of the SM-WSA EIS and Submissions Report there would be no change from the approved project. Landowners consent for permanent works is required.</p>	No additional measures required.	Y	Y	N/A
Hazard and risk	No change from the approved project.	No additional measures required.	Y	Y	N/A
Management and mitigation measures	The relevant project CoA, POs, and REMMs are appropriate to manage the potential impacts associated with these works. No changes or additions to these CoA, POs and REMMs are required.	No additional measures required.	Y	Y	N/A

12. Consistency with the Approved Project

Question	Consider the following:
Is the project as modified consistent with the conditions of approval?	The proposed works would be consistent with the conditions of approval.
Is the project (including the proposed changes) consistent with the objectives and functions of elements of the Approved Project?	<p>The proposal would be consistent with the objectives and functions of the Approved Project. Section 7.4.3 of the EIS states that the metro station at Luddenham Road is to serve and support Western Parkland City Northern Gateway precinct and ensure station design responds to the intended urban structure for a future employment, research and knowledge-based employment precinct. The proposal will ensure better alignment with the Western Sydney Planning Partnership Precinct Plans and the Sydney Science Park Master Plan.</p> <p>The proposal would also support construction of approved project elements such as utilities and batters.</p>
Are the environmental impacts of the proposed change consistent with the impacts of the approved project?	The proposed works would not result in any major changes to environmental impacts as assessed in the project approval. A small additional area of vegetation (0.08 hectares) would be impacted however reductions in other areas of the project alignment can be used to offset this increase.
Is the change within the envelope of what has been approved?	The proposal requires a change to the approved project footprint however this document has assessed the environmental impacts of the proposal and determined that it is generally consistent with the impacts originally assessed.
Are there any new environmental impacts as a result of the proposed works/project changes?	There would be no new environmental impacts as a result of the proposal.
Are the impacts of the proposed activity/works known and understood?	The impacts of the proposal are known and understood. The general layout of activities and proposed methodologies for construction of the Luddenham Road site as assessed within the EIS and Submissions Report would remain unchanged.
Are the impacts of the proposed activity/works able to be managed so as not to have an adverse impact?	The impacts of the proposal would be managed so as to avoid an adverse impact by implementing the project CoA, POs, procedures, and REMMs.
Is the proposed change/s consistent with the approval (having regard to the above assessment)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

13. Other Environmental Approvals

Identify all other approvals required for the proposed works:

N/A

14. Recommendation

Based on the above impact assessment, and with reference to the SM-WSA EIS, Submissions Report and EPBC Act Final Environmental Impact Assessment of the off-airport proposed action (EPBC 2020/8687), including the conditions of approval, it is recommended that:

Tick relevant box	
The proposed change has negligible or more than negligible impacts on the environment or community however is consistent with the Approval, including the conditions of approval. The proposed impacts are consistent with those assessed for the Approved Project (i.e., does not trigger a change to the conditions of approval).	<input checked="" type="checkbox"/>
The proposed change is not consistent with the Approved Project including the conditions of approval and would be subject to a separate modification application.	<input type="checkbox"/>
The proposed change is not substantially the same as the Approved Project and is considered a radical transformation. A new planning pathway should be considered.	<input type="checkbox"/>

Author certification

I certify that to the best of my knowledge this Consistency Checklist:

- Examines and takes into account the fullest extent possible all matters affecting or likely to affect the environment as a result of activities associated with the proposed change; and
- Examines the consistency of the proposed change with the Approved Project; is accurate in all material respects and does not omit any material information.

Name:		Signature:	
Title:	Manager Planning Approvals		
Company:	Sydney Metro	Date:	09/01/2025

Assessment Supporting Signature

Application supported and submitted by

Name:		Date:	09/01/2025
Title:	A/ Director, Planning Approvals	Comments:	The works within the revised construction footprint are subject to landowner's consent.
Signature:			



Assessment Endorsement

Based on the above assessment, are the impacts and scope of the proposed change consistent with the existing Approved Project?

Yes ☒ The proposed change is consistent with the Approved Project and no further assessment is required.

No ☐ The proposed change is not consistent with the Approved Project.

A modification or a new activity approval/ consent is required. Advise Senior Project Manager of appropriate alternative planning approvals pathway to be undertaken.

Endorsed by			
Name:		Date:	09/01/2025
Title:	A/ Director Project, Environment, Sustainability and Planning, SM-WSA	Comments:	The works within the revised construction footprint are subject to landowner's consent.
Signature:			

Appendix A – Figures

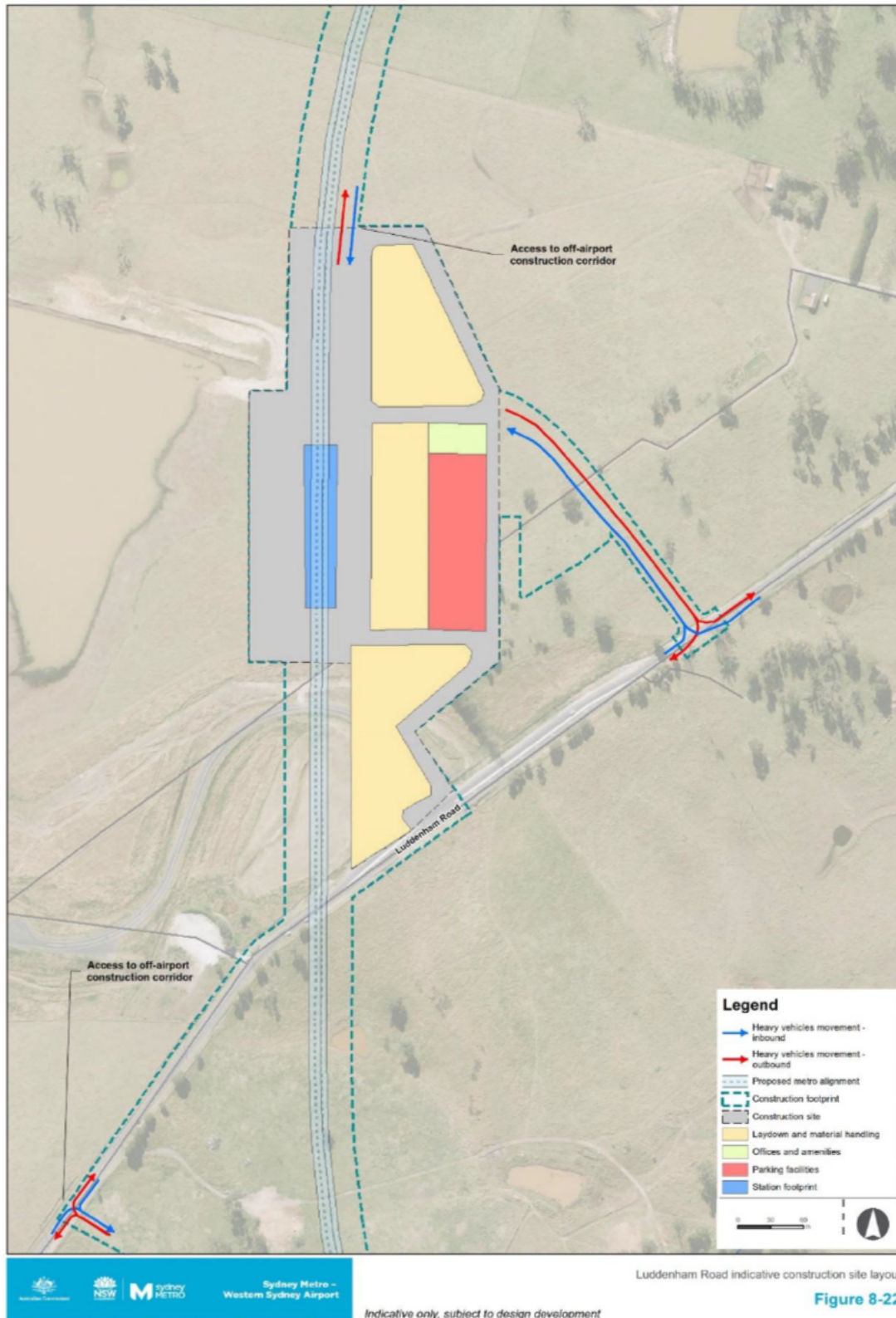


Figure 1: Luddenham Road indicative construction site layout – Approved Project (SMWSA EIS, 2020)



Figure 2: Luddenham Road indicative operational layout and key design elements – Approved Project (SM-WSA EIS, 2022)

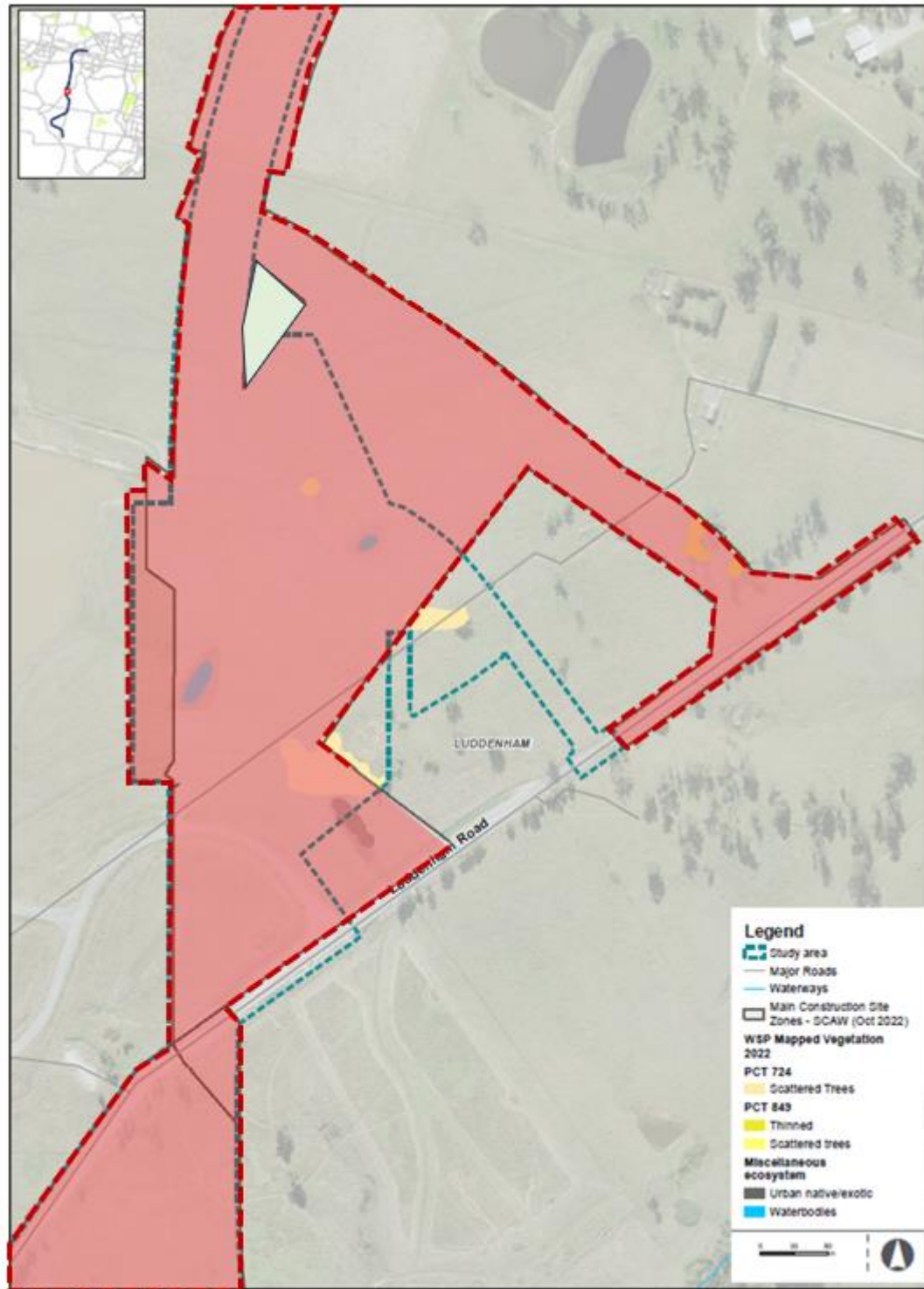


Figure 3: Proposed revised Luddenham Road construction site, shown in red, in comparison to the Approved Project study area.

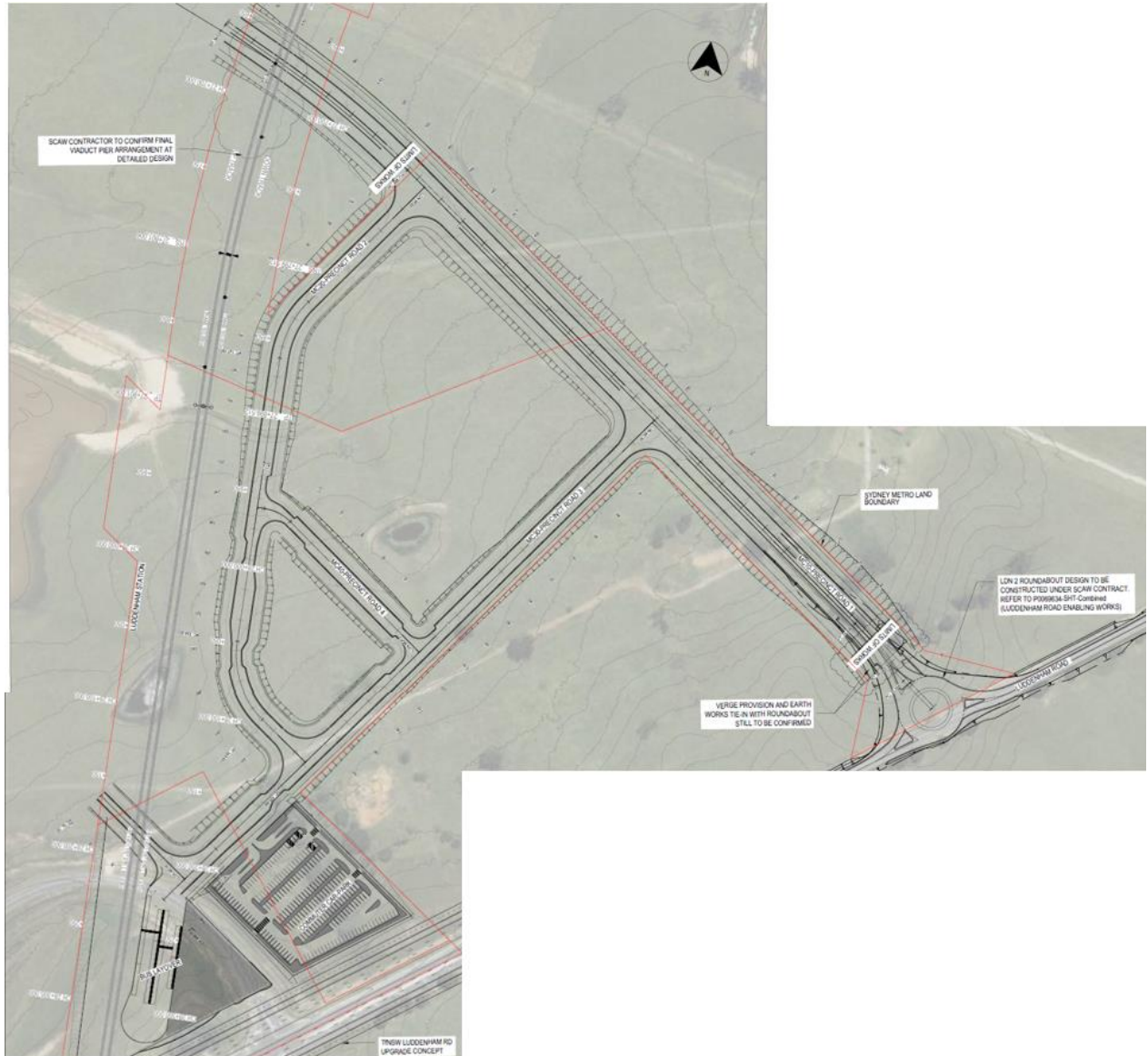


Figure 4: Luddenham precinct road works

Appendix B - Completion of Archaeological Fieldwork Sydney Science Park Aboriginal Heritage Impact Permit C0003861



**Kelleher
Nightingale Consulting Pty Ltd**
ABN 26 120 187 671 ACN 120 187 671

Level 10
25 Bligh St
Sydney NSW 2000
p 02 9232 5373
f 02 9232 5316

17 March 2020

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED]

**RE. Completion of Archaeological Fieldwork
Sydney Science Park
Aboriginal Heritage Impact Permit C0003861**

Kelleher Nightingale Consulting confirms that all archaeological fieldwork is complete for archaeological sites

[REDACTED]
[REDACTED]

All conditions related to the excavation of Aboriginal objects within sites RPS LTPAS01, SSP 1, SSP 3 and SSP 4 within the AHIP boundary are satisfied. No further mitigation is required for sites RPS LTPAS01, SSP 1, SSP 3 and SSP 4 within the AHIP boundary.

If you have any questions, please do not hesitate to contact me on [REDACTED]

Yours sincerely

[REDACTED]

Note: Locations identified under the AHIP are not presented in the public version of this document



Figure 1. Area cleared of Aboriginal heritage (AHIP C0003861 Area)

