

Planning Approval Consistency Assessment Form

SM-17-00000111

Sydney Metro – Metro Body of Knowledge (MBoK)

Assessment Name:	Revised temporary construction footprint for the Bradfield Station site
Prepared by:	Sydney Metro and PLM
Prepared for:	Sydney Metro / Stations, Systems, Trains, Operations and Maintenance (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 - does not apply to this assessment as the proposal will be undertaken outside of the area between St Marys to Elizabeth Drive.

Western Sydney Airport: Airport Plan (as varied September 2021) - does not apply to this assessment as the proposal will 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 – does not apply to this assessment 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)</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)
- 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)
- Consistency Assessment SM002 Change in location of Aerotropolis Core Station site Rev 8.0 (dated 1 February 2022)
- Consistency Assessment SM002 Change in location of Aerotropolis Core Station site Rev 9.0 (dated 14 February 2025)

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/#>

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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, and the relevant conditions of approval.

It is noted that the Government Gazette 10 May 2024 records the change in name of Aerotropolis Core Station to Bradfield Railway Station under the *Geographical Names Act 1966*. Reference to Aerotropolis Core Station has been updated to Bradfield Station for consistency with this gazettal.

Description of existing approved project you are assessing for consistency:

The Bradfield Station construction site is the location for the future station precinct for the Sydney Metro – Western Sydney Airport (SM-WSA) project and has been assessed within the Environmental Impact Statement (EIS) and the Submissions Report.

Environmental Impact Statement

Construction

As discussed in Section 8.7.13 of the SM-WSA EIS, the Bradfield construction site would be located to the east of Badgerys Creek Road. The existing site consists of partially cleared land. A range of construction activities would be carried out at the site to support tunnel boring machine (TBM) retrieval, cut-and-cover station construction and mined excavation of the stub tunnel.

Key construction works at the Bradfield construction site would include:

- construction of the new station box, station structures and finishes
- construction of the crossover
- construction of stub tunnels
- spoil handling, storage and transport
- temporary TBM retrieval shaft excavation
- TBM retrieval
- station precinct works.

Section 8.5.4 of the EIS states that precinct works would take place around each of the stations. Works would include aspects such as earthworks and drainage works.

Operation

As discussed in Section 7.4.6 of the SM-WSA EIS, Bradfield Station would consist of an underground structure (cut-and-cover station typology). The metro station would provide an island platform configuration in a generally north–south orientation. The station would be divided into three main levels, consisting of:

- a ground floor concourse area providing access to the station in addition to the main station services and ancillary infrastructure
- a mezzanine level area, generally providing vertical transport between the ground floor concourse and the platform level. This level would also provide a possible transfer point to a future east-west metro service
- a platform level, consisting of two side platforms with a centrally located track alignment.

Customer access to the station would be provided at the northern end of the metro station via a new station plaza and concourse area. This plaza would be accessed by a new road network to be provided as part of the Bradfield City Centre development. Access to the platforms would be provided via lifts and escalators. Areas for station services and utilities would also be provided at both ends of the station (at ground level).

Submission Report

Construction

As a result of design development and construction planning and to allow greater flexibility in use of the site during construction, the proposed construction footprint at the Bradfield Station precinct was changed as discussed in Section 6.7 of the SM-WSA Submissions Report. The proposed change, is shown in Figure 1 of Appendix A and includes:

- a revised construction footprint that retains some of the footprint proposed in the EIS and extends this predominantly to the east
- realignment of a section of the construction access road connecting the construction site to Badgerys Creek Road to minimise impact on mature trees
- inclusion of the proposed permanent access road within the construction footprint. This access road runs parallel to and immediately west of the rail alignment
- change to the indicative construction site layout as shown in the EIS. This revised layout is indicative only and would be subject to further design development, construction planning and ongoing consultation with the Western Parkland City Authority (WPCA), now Bradfield Development Authority (BDA).

These changes were informed through ongoing consultation with the BDA and would help facilitate movement of materials and equipment during construction as well as minimise conflicts between the delivery programs of the broader Bradfield City Centre works and the project. There is no change proposed to the construction activities to be undertaken at the site as described in Section 8.7.13 of the EIS and replicated above.

Operation

The proposed operational changes for the Bradfield Station site are shown in Figure 2 of Appendix A and include:

- construction of an additional road for operational access to Bradfield Station
- revised location of the indicative operational layout and key design elements. This revised layout retains the same elements as assessed within the EIS.

The proposed operational changes are indicative only and would be subject to further design development and consultation with BDA to ensure integration with the master plan for the site.

Sydney Metro would continue to consult with relevant key stakeholders and affected landowners during detailed design of the stations, interchanges and precincts. A new mitigation measure (OLU2) commits to this consultation being undertaken.

Previously Approved Consistency Assessments

Revised Footprint Bradfield Station SM002 (Rev 8.0) was endorsed (1 Feb 2022) to move the station site boundary up to 20 metres to the north and up to 20 metres to the west to accommodate a move of the station box within the site by approximately 75 metres to the north, was endorsed in February 2022. The revised location of the site is shown in Figure 3 of Appendix A.

Revised Footprint Bradfield Station SM002 (Rev 9.0) was endorsed (14 Feb 2025) to make further changes to the construction site which are needed for a temporary construction area to complete a portion of the batter along the eastern boundary of the site. The area is approximately 200m long and generally 5m wide. This area is

currently being developed as part of the wider Bradfield City Centre construction as managed by the Bradfield Development Authority (BDA) (previously WPCA). The proposed revised footprint for the Bradfield Station construction site is shown in Figure 4 and 5 of Appendix A

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

A previous version of this consistency assessment (Rev 8.0) to move the station site boundary up to 20 metres to the north and up to 20 metres to the west to accommodate a move of the station box within the site by approximately 75 metres to the north, was endorsed in February 2022. The following version (Rev 0.9 endorsed February 2025) permitted a boundary change to the east to accommodate construction of a batter approximately 220m long and 5m wide.

This updated consistency assessment makes an allowance for further temporary construction boundary changes which will be needed to complete works at the interface of the Bradfield Station site and the wider Bradfield City Centre construction works. A 20m buffer around the construction site is needed to allow for temporary construction areas to complete works such as batters, roads and tie-ins where they require interface with the wider Bradfield City Centre construction as managed by the Bradfield Development Authority (BDA) (previously WPCA). The buffer along the northern boundary of the approved construction site has been limited to 15m to ensure unintended impacts to trees which have yet to be cleared as part of BDA works.

This consistency assessment assesses the construction site as well as a temporary construction boundary buffer for the Bradfield Station site. The assessment of the proposal assumes that:

- The construction methodology and activities within the construction site would remain unchanged
- The number of permanent property acquisition and temporary leases would remain unchanged. Specifically, the temporary lease of the area would be managed through the existing Sydney Metro – Western Sydney Airport Interface Agreement with BDA
- All access provisions required for ongoing maintenance and operations will be maintained
- All works within the buffer area would be developed in consultation with BDA and would be the subject of an executed Construction Licence under Appendix C of the B3 Interface Agreement, prior to the works commencing.
- Works within the buffer area would be included on the Project Environmental Protection Licence Premise Map (EPL 21807)
- There are no changes to the operation of the project as a result of this revised construction site.

The proposed buffer footprint for the Bradfield Station construction site is shown in Figure 6 of Appendix A.

3. Timeframe

The temporary construction boundary buffer will be in place for the duration of construction works which are anticipated to be completed by the end 2026. Any areas temporarily used within the buffer zone will be handed back to BDA on completion of the work. Work is scheduled to commence in this area in late April 2025.

The proposed change does not impact the wider construction program.

4. Site description

The proposal would continue be located entirely within Lot 3101 DP 1282964. The location of the proposal is shown on Figure 6 of Appendix A.

The Bradfield Station site was identified as Commonwealth land within the SM-WSA EIS and Submissions Report. Following project approval, Bradfield Station site ownership was transferred to WPCA (now BDA) and is therefore no longer considered Commonwealth land. Access to this site will be managed in accordance with agreements executed between BDA and Sydney Metro.

5. Site Environmental Characteristics

The site of the proposed Bradfield Station currently comprises a large, rural site adjacent to a series of rural residential properties. The land on which the proposal is located appears largely cleared with small remnant patches of native vegetation that intersect with the proposed construction access routes. The proposal is located to the east of Badgerys Creek Road and 250 metres north-west of Thompsons Creek. No natural waterways are located within the proposed Aerotropolis Core Station construction footprint.

Previous assessments undertaken across this region have identified the presence of surface and subsurface Aboriginal artefacts. These are commonly artefact sites and have generally been found near water sources and areas that have been subject to low levels of past disturbance. Consultation with Registered Aboriginal Parties has identified that cultural values are present within the study area in association with the previously identified sites within the study areas. These values can be interpreted as physical markers indicating the long-term presence of Aboriginal people in this region, and the waterways which connect the larger features of the landscape and the sites across it.

The proposal is located entirely within the Liverpool Local Government Area. The land on which the proposal is located is currently zoned as mixed use and enterprise under the consolidated State Environmental Planning Policy (Precincts – Western Parkland City) 2021

Land to the south of Western Sydney International, including the Bradfield Station site, is covered by the approved South West Growth Centre Strategic Assessment and Bradfield City Centre Master Plan. Impacts on matters of national environmental significance (MNES) and Commonwealth land protected by the *Environmental Protection and Biodiversity Conservation Act* (EPBC Act) have already been assessed and approved under that strategic assessment. This means that the potential impacts of this proposal on biodiversity within the off-airport land south of Western Sydney International do not require further State or Commonwealth approval and are therefore not subject to further assessment.

Construction works within the Bradfield City Centre precinct commenced in 2024. These works have included clearing and disturbing much of the area required for the temporary construction buffer.

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 Bradfield Station site location with the WPCA (now BDA) master plan. Sydney Metro and BDA have been working together to better integrate the station with the recent BDA master plan including preferred street layouts and land uses.

Eleven options were developed for the Bradfield Station site and compared to the approved project location. The proposal (Option C1) which requires a move of the station site box approximately 75 m north was identified as the preferred option. The movement of the station box requires an associated move of the Bradfield Station site as a whole by up to 20 metres to the north and up to 20 metres west.

The proposal overcomes issues identified between the approved project location and the WPCA master plan, including:

- poor mid-block station address with obscured sightline to entry
- station entry remote from proposed East-West (EW) road and transport interchange facilities
- service building clash with proposed EW road
- service building in proposed Innovation Park.

The benefits of the proposal include:

- aligns with WPCA master plan
- station address on proposed EW street
- transport integration requirements for the station can be met

The footprint is further refined in this CA to permit a construction buffer boundary which will allow necessary temporary construction stage works to be completed around the boundary of the Bradfield Station site. These works include batter installation, road and infrastructure construction and necessary tie-ins to align with the interfaces with the Bradfield City Centre works. The buffer will allow work to align with the BDA master plan. Sydney Metro, BDA and SSTOM have been working together to ensure integration of the final station design with the Bradfield City Centre plan including final ground design levels.

7. Environmental Benefit

The primary benefit of the proposal is better alignment with the BDA master plan which may provide enhanced outcomes for the community and customers. The proposal would also provide enhanced transport integration outcomes for the project and facilitate necessary construction activities.

The construction boundary buffer will allow completion of the necessary construction works around the boundary of the Bradfield Station site.

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 / Environmental mitigation measures

Number	Condition of Approval/ Environmental mitigation measure	Discussion on relevance and consistency for proposed change
REMM OLU2	Sydney Metro would continue to consult with key stakeholders during design development of the station interchanges and precincts	Sydney Metro and SSTOM contractors have continued to consult with BDA regarding works at Bradfield Station. The proposed temporary construction boundary buffer has been developed in consultation with BDA. Any works in the buffer zone would be the subject of an executed Construction Licence under Appendix C of the B3 Interface Agreement, prior to the works commencing.
SSI CoA A1	The proponent must carry out the CSSI in accordance with the terms of this approval.	The proposed works will be carried out in accordance with the SM-WSA EIS and Submissions Report.
SSI CoA E36	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction.	The project has an existing Unexpected Heritage Finds and Human Remains Procedure. This procedure will be implemented for the duration of construction.
SSI CoA E38	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or public holidays.	Works will take place during standard construction hours and as out of hours. OOHW required would be subject to the Sydney Metro OOHW protocol or the project EPL (no. 21807).
SSI CoA E42	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of work (not subject to an EPL) that is outside the hours defined in Conditions E38 and E39.	OOHW required would be subject to the Sydney Metro OOHW protocol or the project EPL (no. 21807).
SSI CoA E128	Erosion and Sediment controls must be implemented and maintained consistent with the blue book.	No change from the approved project.
EPBC 2020/8687	N/A	The works are located at Bradfield which does not form part of the EPBC approval (2020/8687) as the South West Growth Centre Strategic Assessment was already in place over this area.

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

10. Impact Assessment – Construction

The SM-WSA EIS assessed the area covered by the change in boundary to the west and part of the south. The SM-WSA Submissions Report assessed the area covered by the change in boundary to the east and part of the south. The area covered by the change in boundary to the north is included below. The proposal is not predicted to have a material impact to other environmental issues which were assessed in the EIS and Submissions Report and as such, are not detailed within the desktop environmental assessment.

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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
Biodiversity	<p>The changes to the location of the Bradfield Station construction footprint are covered by the approved South West Growth Centre Strategic Assessment. Impacts on MNES and Commonwealth land protected by the EPBC Act have already been assessed and approved under that strategic assessment. The proposal, including the temporary construction buffer, are considered to be consistent with the approved actions listed in the approval provided by the Minister.</p> <p>No biodiversity assessment of this potential minor change is required. The area required for the construction boundary buffer has generally been heavily disturbed and does not require any clearing and these potential impacts do not require further State or Commonwealth biodiversity approvals. In the area to the north of Bradfield Station the buffer zone has been reduced to approximately 15m to avoid the currently uncleared trees and vegetation. While this vegetation will ultimately be removed and has been assessed for removal by the strategic assessment it is not the intent of buffer zone to allow for clearing for SSTOM works.</p> <p>No change from the approved project.</p>	<p>1) No clearing of vegetation within the buffer zone (Rev 10.0).</p>	Y	N	Y	

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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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
Water	<p>In respect to the Bradfield Station construction site, the EIS noted that:</p> <ul style="list-style-type: none"> construction site is located outside flood prone land and therefore there would be no flooding impacts local overland flow paths are located within part of the Bradfield Station construction site and in areas adjacent to the construction site construction activities in and around waterways would potentially have a short-term impact on the hydrology of waterways and overland flow paths including changes in run-off behaviour and increased sedimentation construction activities have the potential to temporarily degrade the water quality of waterways within the study area and areas downstream of the project. <p>The Bradfield Station construction site is largely outside the extent of the 5 per cent AEP but intersects a minor overland flow path which forms a tributary of Thompsons Creek. The existing flood behaviour indicates that the area is subject to overland flow generated by heavy rainfall.</p> <p>The proposal would not result in any material change to the impacts assessed above. Work within the buffer zone does not materially involve an increase in the area of the construction footprint for the station and as a result is not likely to change the volume of runoff. Any temporary works in the buffer zone would not lead to additional construction phase flood impacts. Any</p>	No additional measures required	Y	N	Y	

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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
	<p>flood impact is likely to be minimal and would be managed in accordance with existing measures. Similarly, any temporary construction boundary change will not change the scope or extent of impacts and will be managed through existing detailed site documentation including site specific ERSED plans.</p> <p>There is no change proposed to the construction activities to be undertaken at this site and hence no additional sources of pollutants to impact water quality by comparison to the impacts that were assessed in the EIS and Submissions Report.</p> <p>No change from the approved project.</p>					
Soils and contamination	<p>The proposal would not result in any change to the location of areas of environmental concern, potential contamination sources and overall risk ratings, compared to the approved project.</p> <p>No change from the approved project.</p>	No additional measures required	Y	N	Y	
Air quality	No change from the approved project.	No additional measures required	Y	N	Y	
Noise and vibration	<p>There are low density residential and rural residential properties located to the west along Badgerys Creek Road and low-density residential properties located to the east and south of Thompsons Creek. The nearest residential receiver is approximately 380 metres west from the works.</p> <p>The EIS identified that the Bradfield Station construction site and surrounding areas are located within noise catchment area (NCA12).</p>	No additional measures required	Y	N	Y	

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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
	<p>During standard construction hours the most affected residential receivers are predicted to be located along Badgerys Creek Road, Derwent Road and in the area to the east and south of Thompsons Creek with highest impacts predicted to occur during the following construction activities:</p> <ul style="list-style-type: none"> enabling works (Scenario 1) earthworks and excavation (Scenario 4) station construction (Scenario 5) station fitout, precinct and integration works (Scenario 8) <p>During out-of-hours construction the most affected residential receivers are predicted to be located along Badgerys Creek Road, Derwent Road and in the area to the east and south of Thompsons Creek with highest impacts expected to occur during finishing works (Scenario 9).</p> <p>The proposal including works in the buffer zone would move slightly closer to some receivers but would not result in any material change to the potential construction noise and vibration impacts assessed for the approved project. The proposal may marginally increase predicted construction noise impacts for some receivers along Badgerys Creek Road. These impacts would continue to be managed in accordance with the Construction Noise and Vibration Standard.</p> <p>The temporary construction boundary change will not change the scope of potential noise impacts. The minor change to the location of the works is</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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
	considered insignificant in the context of the adjacent works on the BDA site. There would be no change from the approved project from a construction ground-borne noise or vibration perspective.					
Aboriginal Culture and Heritage	The proposal would not result in any change to the impacts assessed for the approved project. The revised footprint including the buffer area does not contain any additional registered AHIMS sites. Furthermore, the northern area of the revised footprint was subject to survey during preparation of the Revised Aboriginal Cultural Heritage Assessment Report and no potential areas of archaeological sensitivity were identified. Any unexpected heritage finds would be managed as per the Sydney Metro Unexpected Heritage Finds Procedure and Exhumation Management Procedure. No change from the approved project.	No additional measures required	Y	N	Y	
Historic Heritage	The potential minor change in the location of the Bradfield Station site would not result in any change to the assessed direct impacts for the Former Overseas Telecommunications Commission Site Group, the two water tanks on the east side of Badgerys Creek Road or the Kelvin/Kelvin Park Group as detailed in the EIS. The proposal would not change the impacts assessed in the EIS for the Bringelly RAAF Base, a potential heritage item. The potential minor change would also not impact on any of the remaining elements of the Bringelly RAAF Base	No additional measures required	Y	N	Y	

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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
	which were identified as having moderate or little heritage significance. Any unexpected heritage finds would be managed as per the Sydney Metro Unexpected Heritage Finds Procedure and Exhumation Management Procedure. No change from the approved project.					
Community and socio-economic	No change from the approved project.	No additional measures required	Y	N	Y	
Traffic and transport	No change from the approved project.	No additional measures required	Y	N	Y	
Waste and resource management	The reduced tunnel length as a result of the Bradfield station box moving approximately 75 m north may result in a slightly reduced generation of spoil and construction waste volumes.	No additional measures required	Y	N	Y	
Visual	No change from the approved project.	No additional measures required	Y	N	Y	
Land use and property	There would be no change to land use	2) Any works in the buffer zone would be the subject of an executed Construction Licence under Appendix C of the B3 Interface Agreement, prior to the works commencing. 3) Any additional temporary land used within the buffer zone would be included on an updated premise map (Environmental Protection Licence 21807) for the duration of the work.	Y	N	Y	
Hazard and risk	No change from the approved project.	No additional measures required	Y	N	Y	

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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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
Other <i>Such as geotechnical, climate change, cumulative</i>	A climate change risk assessment was undertaken as part of Chapter 17 of the SMWSA EIS. As discussed in Section 17.4.2, climate change risk would be assessed throughout design development and risk treatments would be progressively incorporated as appropriate. The potential climate change risks identified in Table 17-3 of the EIS were considered to present the most material risks to the operational performance of the project including extreme heat and extreme rainfall and flooding events. The proposal would not require any changes to the climate change risks and risk treatments identified in Table 17-3 of the EIS	No additional measures required	Y	N	Y	

11. Impact Assessment – Operation

The SM-WSA EIS assessed the area covered by the change in boundary of up to 20 metres to the west. The area covered by the change in boundary of up to 20 metres to the north is included below. This updated consistency assessment (Rev 10) assesses a temporary construction buffer change only and for this reason will have no impact on the operation of the Project. The proposal is not predicted to have a material impact to other environmental issues which were assessed in the EIS and as such, are not detailed within the desktop environmental assessment.

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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
Biodiversity	No change from the approved project.	No additional measures required.	Y	N	Y	
Water	The proposal would not result in any material change to the impacts assessed for the approved project. The proposal does not involve an increase in the area of the operational footprint for the station and as a result is not likely to change the volume of runoff. No change from the approved project.	No additional measures required.	Y	N	Y	
Soils and contamination	No change from the approved project.	No additional measures required.	Y	N	Y	
Air quality	No change from the approved project.	No additional measures required.	Y	N	Y	
Noise and vibration	The proposal is not considered likely to result in any change to the predicted operational ground-borne noise impacts for metro trains operating in the tunnels, compared to the approved project. Operational noise predictions from mechanical and electrical plant at the revised station location is predicted to remain within relevant noise trigger levels at the closest residential receivers along Badgerys Creek Road. No change from the approved project.	No additional measures required.	Y	N	Y	

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	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
Aboriginal Culture and Heritage	No change from the approved project.	No additional measures required.	Y	N	Y	
Historic Heritage	No change from the approved project.	No additional measures required.	Y	N	Y	
Community and socio-economic	The primary benefit of the proposal is better alignment with the WPCA (now BDA) master plan which may provide enhanced outcomes for the community and customers. The proposal would also provide enhanced transport integration outcomes for the project.	No additional measures required.	Y	N	Y	
Traffic and transport	The proposal would provide enhanced transport integration outcomes for the project and better alignment with street layouts identified in the WPCA (now BDA) master plan.	No additional measures required.	Y	N	Y	
Waste and resource management	No change from the approved project.	No additional measures required.	Y	N	Y	
Visual	No change from the approved project.	No additional measures required.	Y	N	Y	
Land use and property	The proposal would ensure better alignment with the WPCA (now BDA) master plan.	No additional measures required.	Y	N	Y	
Hazard and risk	No change from the approved project.	No additional measures required.	Y	N	Y	
Other - none	No change from the approved project.	No additional measures required.	Y	N	Y	

12. Consistency with the Approved Project

Question	Response
Is the project (including the proposed changes) consistent with the conditions of approval?	The proposal would not transform the existing Approved Project. The Approved Project would continue to provide a new metro rail line between St Marys and Bradfield. 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?	The proposal would be consistent with the objectives and functions of the Approved Project. Section 7.4.6 of the EIS states the Bradfield Station is proposed to be integrated with the future Bradfield City Centre precinct. WPCA (now BDA) has prepared a master plan for the Bradfield precinct to guide development on the site and detail the public domain and development interface with the station buildings. The proposal would ensure better alignment with the master plan. Construction of approved project elements such as batters, roads, utilities and other tie-ins is supported by the proposal.
Are the environmental impacts of the proposed change consistent with the impacts of the approved project?	The changes identified in this assessment are consistent with the objectives and functions of the elements of the Approved Project. The indicative layout and key design elements within the revised location for the Bradfield Station site would remain unchanged.
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 and operation of the Bradfield Station 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 considered to have a significant impact to relevant controlling provisions under the EPBC Act?	The Bradfield Station construction footprint is covered by the approved South West Growth Centre Strategic Assessment. Impacts on MNES and Commonwealth land protected by the EPBC Act have already been assessed and approved under that strategic assessment. The works do not have any impact on any matters under the EPBC Act.
Would any Conditions of Approval be required to be changed as a result of the proposed change (having regard to the above assessment)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the proposed change/s consistent with the approval (having regard to the above assessment)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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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 and Submissions Report 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"/>

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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:	Environment Approvals Advisor		
Company:	Parklife Metro D&C	Date:	03/04/2025

Assessment Supporting Signature

Application supported and submitted by			
Name:		Date:	22 April 2025
Title:	Planning Approvals Officer	Comments:	
Signature:			


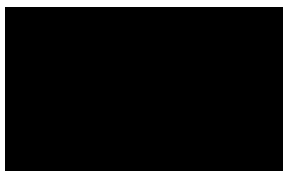
Assessment Endorsement

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.

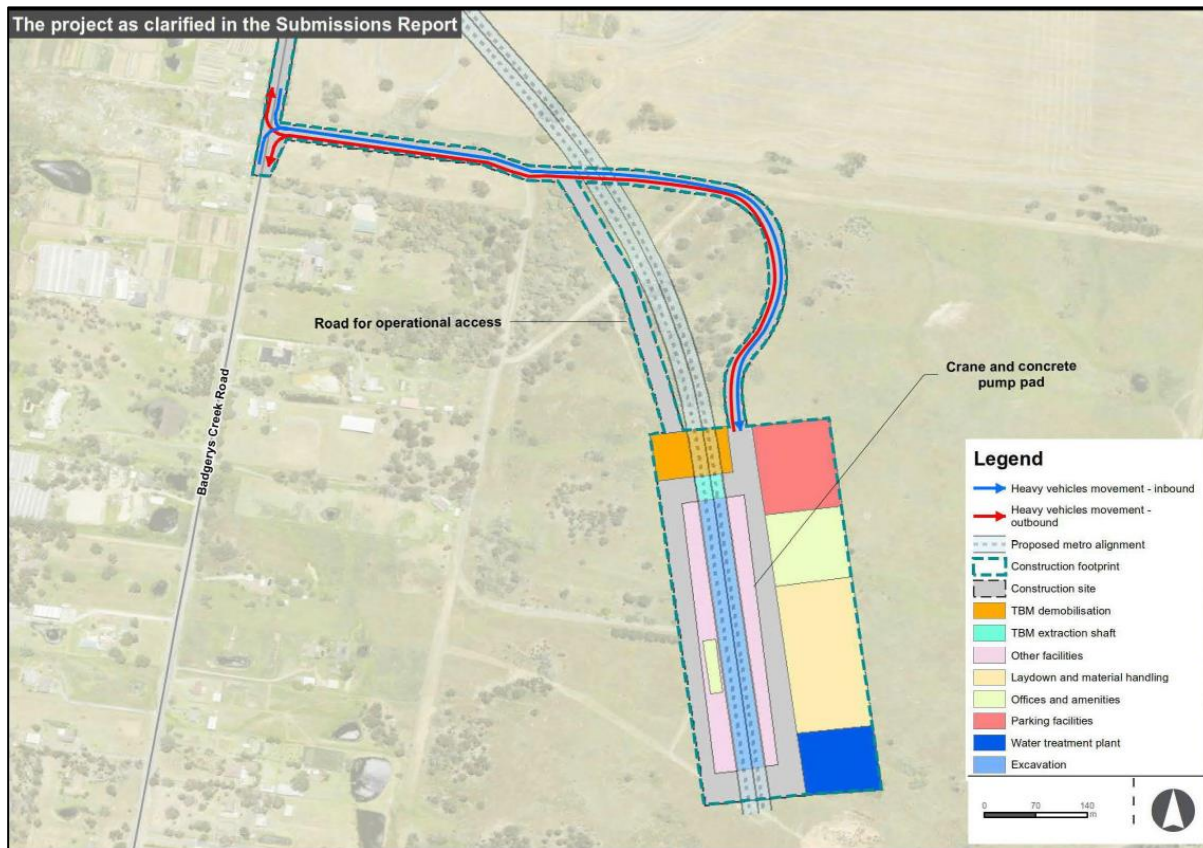
A modification or a new activity approval/ consent is required. Advise Senior Project Manager of appropriate alternative planning approvals pathway to be undertaken.

Endorsed by			
Name:		Date:	23/04/2025
Title:	A/Director Planning Approvals	Comments:	Noting three new measures have been applied as part of this CA <ol style="list-style-type: none"> 1) No clearing of vegetation within the buffer zone (Rev 10.0) 2) Any works in the buffer zone (rev 10.0) would be the subject of an executed Construction Licence under Appendix C of the B3 Interface Agreement with BDA, prior to the works commencing. 3) Any additional temporary land used within the buffer zone would be included on an updated premise map (Environmental Protection Licence 21807) for the duration of the work.
Signature:			

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Appendix A

Figures



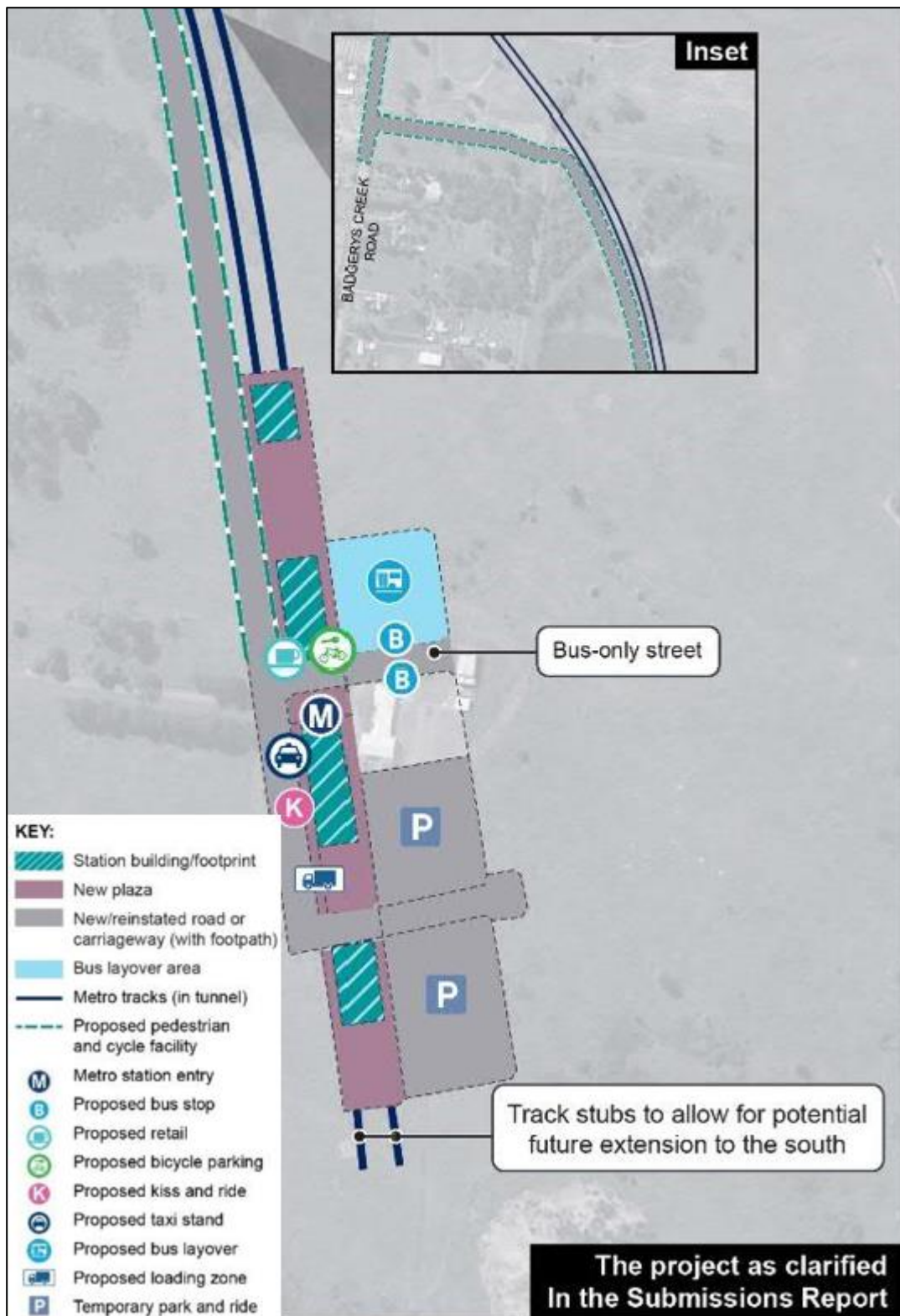


Figure 2: Aerotropolis Core Station – Indicative layout and key design elements - approved project (SMWSA Submissions Report, 2021)

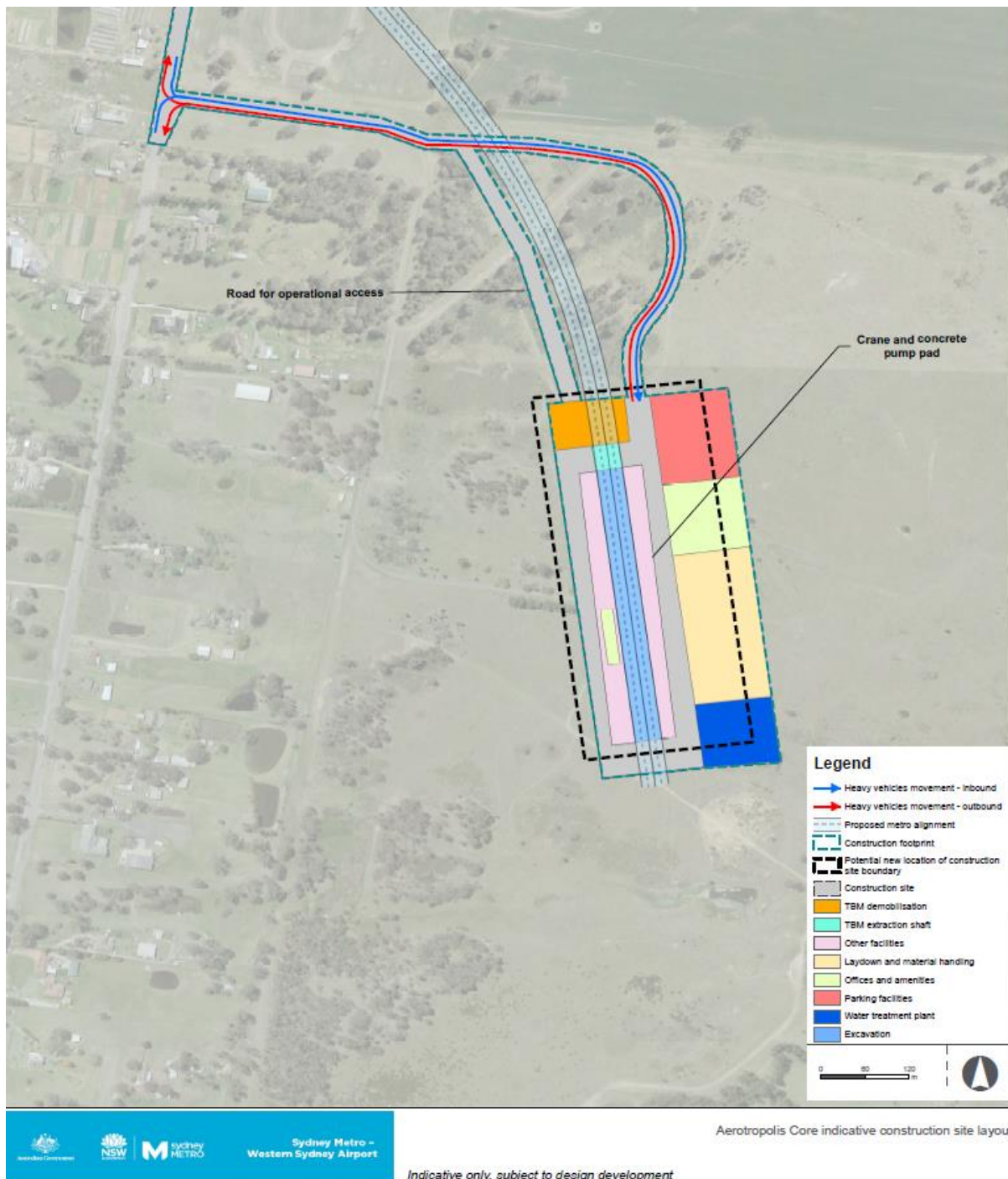


Figure 3: Revised Aerotropolis Core indicative construction site location shown by a black dashed line compared to approved project.



Figure 4: Temporary construction boundary shown in yellow compared to approved project.



Figure 5: Temporary construction boundary - detail shown in yellow compared to approved project.

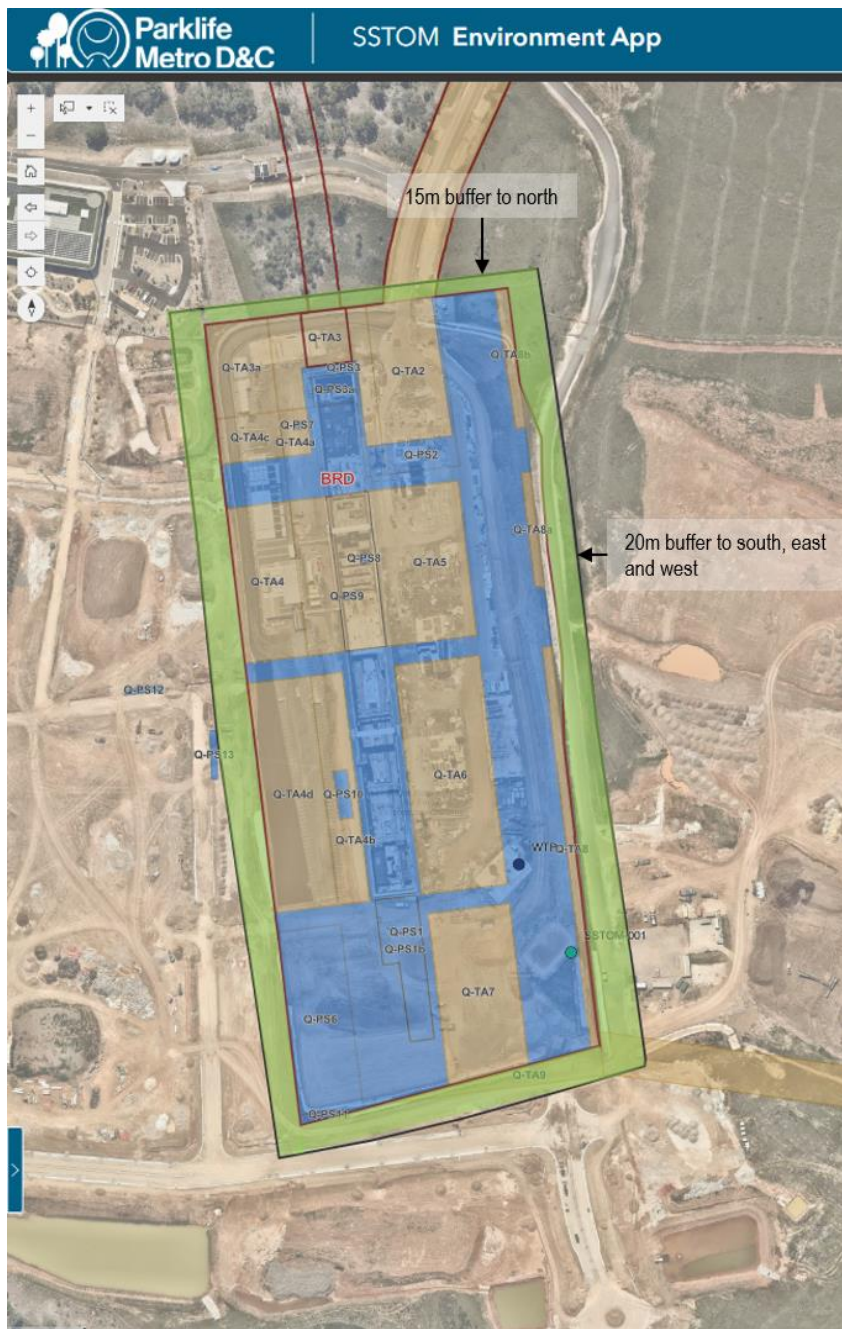


Figure 6: Construction boundary buffer (Rev 10.0) – detail shown in green compared to approved project



Figure 7: Construction boundary buffer (Rev 10.0) – detail shown in green compared to assessed areas within the EIS and Submissions Report (shown by a teal dotted line).